

REPORTS ANALYSIS DIVISION REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: May 31, 2017

ANALYST: Brian Jones

I. COMMITTEE: National Right to Life Victory Fund
(C00509893)
Wayne Cockfield, Treasurer
512 10th Street, NW
Washington, DC 20004

II. RELEVANT STATUTE: 52 U.S.C. § 30104(g)(1)
11 CFR § 104.4(c)

III. BACKGROUND:

Failure to Provide Supporting Schedules (Failure to Timely File 24-Hour Reports)

National Right to Life Victory Fund ("the Committee") failed to timely file one (1) 24-Hour Report supporting two (2) independent expenditures totaling \$61,813.59 disclosed on the 2016 30-Day Post-General Report, made after the 20th day but more than 24 hours before the 2016 General Election (Attachment 2).

On December 20, 2016, the Committee filed one (1) 24-Hour Report to support two (2) independent expenditures, totaling \$61,813.59, disseminated on October 28, 2016 (Image 201612209040691593).

Also on December 20, 2016, the Committee filed its 2016 30-Day Post-General Report, covering the period from October 20, 2016 through November 28, 2016, which included a Schedule E (Itemized Independent Expenditures) disclosing three hundred and forty-two (342) independent expenditures totaling \$294,872.00, made in support of or in opposition to two hundred and sixty-six (266) federal candidates. The Committee failed to timely file one (1) 24-Hour Report to support two (2) independent expenditures totaling \$61,813.59 for the 2016 General Election (Image 201612209040691784-85).

On February 26, 2017, a Request for Additional Information (RAI) was sent to the Committee referencing the 2016 30-Day Post-General Report. The RAI noted that the Committee may have failed to timely file one or more of the required 24-Hour Reports for the independent expenditures disclosed on the report. A chart was enclosed with the RAI which identified two (2) independent expenditures, totaling \$61,813.59, for which a 24-Hour Report(s) had not been timely filed (Image 201702260300081518).

On April 11, 2017, the Reports Analysis Division (RAD) Analyst spoke with David Osteen, representative for the Committee. The Analyst stated that the late 24-Hour Report noted on the RAI sent February 26, 2017 referencing the Committee's 2016 30-Day Post-General Report may be referred to the Commission for potential further action. The Analyst stated that the Committee could file a Miscellaneous Electronic Submission ("FEC Form 99") if there was further information to disclose regarding the late 24-Hour Report (Attachment 3).

To date, no further communication has been received from the Committee regarding this matter.

CONFIDENTIAL

National Right to Life Victory Fund (C00509893)
2016 30-Day Post-General Report

24-Hour Report Not Timely Filed

Name of Payee	Date of Dissemination (Schedule E)	Expenditure Amount	Candidate Supported	Election	24-Hour Report Filed
Printing Partners	10/28/16	\$30,906.79 <i>24-Hour Report Required</i>	Toomey, Patrick Joseph	2016 General	12/20/16
Printing Partners	10/28/16	\$30,906.80 <i>24-Hour Report Required</i>	Trump, Donald J	2016 General	12/20/16

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