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June 21, 2017

Jeff S. Jordan
Assistant General Counsel
Federal Election Commission
Office of Complaints Examination
and Legal Administration
999 E. Street, NW
Washington, DC 20463

Re: National Right to Life Victory Fund,
Referral RR 17L-12

via electronic mail and U.S.P.S.

CELA

2017 JUN 21 PM 2:01

RECEIVED
FEDERAL ELECTION
COMMISSION

Dear Mr. Jordan,

This letter is sent on behalf of the National Right to Life Victory Fund ("NRL-VF") and its Treasurer, Wayne Cockfield, in response to your referral RR17L-12, received on June 6, 2017.

Background

As indicated in your letter, it appears that NRL-VF filed a 24-hour Schedule E report for 2 "last minute" independent expenditures distributed/disseminated on October 28, 2016 at the same time as its post-general election report, on December 20, 2016.

The need for a 24-hour report for the two expenditures was discovered when NRL-VF was gathering information for the regular post-general report. NRL-VF has isolated what it considers the cause of the missed report and has implemented changes that should prevent a similar occurrence.

As the Referral notes, during the relevant period, NRL-VF made and properly reported 342 independent expenditures in support of 266 federal candidates, but did not file a 24 hour

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report for two independent expenditures. At that time, NRL-VF's procedure for reporting of expenditures was for the staff requesting funding of expenditures to contemporaneously copy the funding request to the compliance vendor responsible for reporting. The inadvertent error occurred because the funding request for the two expenditures at issue here was not contemporaneously copied to the compliance vendor.

Remediation

When NRL-VF ascertained the need for the 24 hour report, after discussing it with the compliance vendor, it was decided that the 24-hour report for the two independent expenditures was to be filed at the same time as the 2016 30-day Post-General Report that covered the period from October 20, 2016 through November 28, 2016.

NRL-VF has taken steps to avoid repeating the inadvertent error committed here. As noted, at the time of the missed report, the normal procedure—explained and reinforced in writing—was for the staff responsible for making an expenditure to contemporaneously transmit the information to the compliance vendor for proper evaluation and reporting. NRL-VF has adopted a further “fail-safe.” In addition to contemporaneously submitting payment requests to the compliance vendor, requests for payment for expenditures cannot be fulfilled until it has been confirmed in writing that the request has been noted by at least one other person at NRL-VF who is conversant with federal reporting requirements and is not the person fulfilling payment requests.

Request

NRL-VF believes that this matter qualifies for fast track resolution in ADR because the NRL-VF has remediated the inadvertent error by filing an IE report and has taken steps to prevent a similar error in the future. NRL-VF also believes that their disclosure and remediation warrant waiver or maximum reduction of any penalty for the error.

Sincerely,

THE BOPP LAW FIRM, PC



Jeffrey P. Gallant