

RECEIVED
SECRETARY
PUBL
15 JAN -5 PM 5:53

January 5, 2014

Ms. Jill Sugarman
Sr. Campaign Finance & Reviewing Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, D.C. 20463

IDENTIFICATION NUMBER: C00546788

REFERENCE: 12 DAY PRE-GENERAL REPORT (10/01/2014—10/15/2014)

Dear Ms. Sugarman,

This statement is in response to the Commission’s letter dated December 1, 2014. The Commission requested additional information regarding five items.

First, the Commission requested clarification regarding contributions from individuals or political committees that appear over the limit. Upon review by the Committee, these contributions fall into one of three categories: (1) contributions were redesignated to Primary Debt Retirement within 60 days of receipt; (2) contributions that were refunded; and (3) duplicate entries for a single contribution. The contribution refunds were either reflected on the Post-General report (See TRANS IDs SB20A.125280 (Applbaum); SB20A.125326 (Broughton); SB20A.125327 (Conrades); SB20A.125322 (Culver); SB20A.125323 (Stone); SB20A.125254 (Tippie); SB20A.125324 (Heukelom); SB20A.125251 (Witmer)), October Quarterly Report (See TRANS ID SB20A.125215 (Gross)), or will be reflected on a subsequent report. The contribution from Romney for President was reported twice by mistake. The duplicate entry will be removed from the Amended Pre-General Report being filed concurrently with this response (“Amended Report”) and the cash-on-hand will be adjusted accordingly on the Amended Report.

Second, the Commission asks about possible impermissible corporate contributions. The Committee has procedures in place to vet contributions. The contribution identified, from “Johns Unlimited,” is from a sole proprietor. The Amended Report includes the individual to whom the contribution is attributed (See TRANS ID SA11AI.83465.0 on page 249).

Third, the Commission requested clarification regarding contributions received through conduits ActRight, Club for Growth, Reclaim America PAC, Senate Conservatives Fund, and The Tea Party Leadership Fund. Two unitemized contributions that appeared on the Post-General Report were included in this period by mistake. These have been removed on the Amended Report and the cash on hand is adjusted accordingly. Otherwise, the total amount earmarked by the conduits by way of memo entries as shown on Line 11(a) of the report and the individual contributions disclosed with live entries on Line 11(a) earmarked through those conduits differ by an amount that represents unitemized contributions. That is, the Committee received a number of contributions from individuals that do not aggregate over \$200 per calendar year; as such, they were not included as itemized contributions. These unitemized contributions are

15020020001