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Response to 5-22-2013 RFAI of October Quarterly FEC filing

This document is being submitted to address the concerns raised in the above referenced letter. We have reviewed the documents in question and offer the following clarifications:

1) Analysis of increase in amendment disbursements totaling \$148,425.75 more than original filing:

The additional disbursements were discovered during the process of reconciling bank statements to actual activity. This is now standard practice for this Committee, but was not during 2012.

We found an overall pattern of diligent efforts to record all transactions, but lack of awareness of the following led to inadvertent reporting errors:

Some disbursements were mis-coded during initial data entry, which resulted in their exclusion from the report. Examples include a transaction originally dated 2002 instead of 2012, and transactions posted to a committee designation other than the one intended. The latter is due to a default in the data entry screen that operators have to override each time a transaction is entered.

Misunderstanding the use of MEMO entries led to expenses reported as such on original report, but excluded from summary page totals, due to MEMO designation.

Lack of a systematic way to include electronic transactions & manually written checks in the record keeping lead to inadvertent omissions of some bank fees (\$864.74), all payroll tax payments (\$3,709.91), and one manual check (\$17,547.10).

The most substantial omission from the original filing was a \$41,250 service fee paid to the television production company that produced the advertising expenditures listed in Schedule E. The company, Eichenbaum & Associates, was paid a total of \$583,478, in one lump sum. The independent expenditures that resulted from that payment, as listed in Schedule E, amounted to \$542,228. The difference was the \$41,250 service fee, which was originally thought to be included in the Schedule E expenditures. The omission was discovered during the process of reconciling bank statements, and disclosed on line 29 in the amended filing dated March 21, 2013.

There was no apparent intent to omit these transactions from the report.

2) Increase in funds due to committee of \$26,467.85, disclosed on line 9 of amended filing

This entry was intended to re-classify a refund received in October, from above referenced advertising vendor for expenditures made on August 8, 2012.

It was originally reported as an itemized receipt on line 17 in the Pre-General filing. That filing did include a note indicating that the receipt was a refund for an overpayment. The original error was un-intentional, due to an apparent lack of awareness of how to use the data management software to properly record this type of transaction.