

Dear Mr. Butler,

Regarding The question of initials not being acceptable, I can assure you that if we have been given the full name of an individual that is what we report. If the individual has only provided us with initials then that is what we report. To be frank, I wasn't aware that initials are not acceptable and therefore we have not focused on going back to our contributors to specifically ask for that. In most cases where we have difficulty getting cooperation from the contributors it is over the issue of employer and occupation, so we have focused a great deal of effort to collect that information. Now that we have been advised that initials are not sufficient, we will concentrate more effort to collect full names from our contributors.

Regarding the issue of 'info requested', 'refused', 'self/business', and 'self/ceo' not being acceptable, I am aware that 'info requested' and 'refused' are not acceptable. Those entries are used only as a last resort when we are unable to get that information from the donor. Regarding 'self/business' and 'self/ceo' not being acceptable, again, those designations are used because those are the replies we get from some donors when we ask for employer/occupation. Just to clarify, it is my understanding that if the donor is self-employed that 'self' is acceptable as employer designation. I understand that just saying 'business' or 'ceo' does not provide the specificity that is looked for under the law. Nevertheless, if that is all we have been able to obtain that is what we report.

Our efforts to collect contributor information includes a clear and concise request with every solicitation. The contributor is informed that we are required to report the name, address, employer and occupation of every donor who give \$200 or more.

We have telephone numbers and email addresses for well over ninety percent of our donors and we use those methods to follow up with donors who don't respond to our initial request. For the ten percent for which we only have street addresses we will mail a 2nd request with a donor form and reply envelope.

If the above outlined methods are unsuccessful we supplement our efforts by consulting the FEC database for missing information to see if our donor has given to other committees or campaigns and very often that is the case and we can obtain employer/occupation information by consulting other reports.

In addition we consult White Pages and other publicly available databases for correct street addresses and zip codes.

Regarding the Schedule B expenses for 'phone/mail communication', 'postage' and 'printing', these expenses were for generic fund raising activity and not express advocacy, 'public communications' or voter drive activity. I can assure you that we are eager to report any such activity because it reflects the fact that we are fulfilling our purpose as a PAC. On many occasions in the past we have reported independent expenditures and desire to do so whenever we engage in express advocacy.

I have gone back through our Year End Report and amended the names with initials and provided more specific information for the employer/occupation in those cases you brought to our attention.

I hope this addresses the points covered in your letter. Please advise if you have any further questions or concerns.

Sincerely,

Randy Goodwin  
Treasurer  
Treasurer

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