

A-G79 @ B9CI G'H9LH'fl 97 : cfa ' - - t

This is in response to letters of inquiry dated July 29, 2013 regarding our 30 Day Post-General Report (10/18/12 - 11/26/12) and our Year End Report (11/27/12 - 12/31/12).

Regarding the 30-Day Post-General:

The \$10,000 transfer to our non-federal account was made exclusively for the purpose of permissible non-federal activity. Our non-federal account did NOT pay any expenses that should have been allocated.

Regarding the question concerning salary or salary related expenses, no employee devoted more than 25% of their compensated time in a given month to Federal Election Activity and therefore the expense was eligible for allocation and properly reported on Sch H-4.

Regarding Sch H-4, it was our understanding from previous discussions with Commission staff that any administrative expenditure eligible for allocation should be reported on H-4 regardless of whether the allocation transfer actually occurred. Since that earlier understanding now appears to have been incorrect, we will in the future endeavor to properly separate administrative expenses between Sch H-4 and Sch B Line 21(b) as appropriate.

Regarding the Year-End Report:

Regarding "salary" expense, no employee devoted more than 25% of their compensated time in a given month to Federal Election Activity and therefore the expense was eligible for allocation and was properly reported on Sch H-4.
