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October 3, 2013

Ms. Sarah Juris
Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, DC 20463

IDENTIFICATION NUMBER: C00518282

REFERENCE: AMENDED OCTOBER QUARTERLY REPORT (07/01/2012-09/30/2012), RECEIVED 10/25/2012

Dear Ms. Juris:

This statement is in response to the Commission's letter dated August 29, 2013. The Commission requested additional information on 14 items

1. The Commission requested clarification regarding the total disclosed on Line 11(a)(i) of the Detailed Summary Page. The amount disclosed is correct and all donors were disclosed on Schedule A supporting Line 11(a)(i). However, due to an inadvertent character placed in the record of transaction ID: SA11.2242748, this contribution was not included in the total of the entries itemized on Schedule A. Our Committee has amended our report to correct this error.

2. The Commission requested clarification for contributions on Schedule A of our report from individuals who have mailing addresses outside of the United States. Our Committee has safeguards in place to ensure that contributions are made only by eligible donors. Our committee has confirmed that all donors attached to this letter are eligible donors and are not foreign nationals.

3. The Commission requested clarification regarding aggregate year-to-date totals for two donors. Both donors were refunded in full during the period covered by this report bringing their aggregate totals to the disclosed amounts. Please see transaction IDs: SB28A.1412 and SB28A.1413 in this report.

4. The Commission requested clarification regarding chargebacks for several donors. JOHN ECKERT is the husband of EILEEN CONROY. These donors contributed and were charged back within the period covered by this report, though the joint contributions were inadvertently unitemized. Our Committee has amended our report to correctly itemize this joint contribution. Please see transaction ID: SA11.3079214C and ID: SA11.3079197C. OSCAR SEIKALY contributed during the period covered by the 2012 July Quarterly report. Please see transaction ID: SA11.953210 on that report. In this transaction, the donor's name was misspelled. Our Committee has amended our 2012 Q2 report to correct this error.

5. The Commission requested clarification regarding in-kind contributions disclosed on Schedule B of our report that must be itemized on Schedule A of our report. All in-kind contributions received by the Committee are included on lines 11(a)(iii) and 21(b) of the detailed summary page. Contributions aggregating \$200 and under from one donor are not itemized on Schedule A.

6. The Commission requested clarification regarding transfers from other Committees which had not been disclosed on their reports of receipts and disbursements. Our committee has researched each of the receipts identified, and can confirm that each was received from the donor 's federal account.

7. The Commission requested clarification regarding offsets to expenditures disclosed on Schedule A supporting Line 15 of our report. The offsets came from media organizations reimbursing the Committee for their portion of expenses for

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travel to fundraising events with the candidate provided by vendor Air Charter Team. Details of the disbursements to Air Charter Team are below:

Date	Amount	TranID
20120730	18,850.27	SB21B.1633
20120822	36,815.70	SB21B.1741
20120822	3,824.75	SB21B.1783
20120904	15,407.00	SB21B.1847
20120911	134,334.86	SB21B.1946
20120922	75,920.56	SB21B.2136
20120924	38,257.00	SB21B.2153
20120709	126,984.00	SB21B.21933
20120710	44,089.59	SB21B.21995
20120713	76,735.16	SB21B.22299
20120720	59,353.72	SB21B.23226
20120803	40,494.61	SB21B.25158
20120803	6,233.14	SB21B.25168
20120806	123,614.06	SB21B.25390
20120806	102,797.00	SB21B.25395
20120809	14,832.37	SB21B.25919
20120813	79,052.26	SB21B.26393
20120814	22,695.33	SB21B.26620
20120814	215,368.00	SB21B.26621
20120820	1,373.22	SB21B.27741
20120820	92,283.00	SB21B.27874
20120821	74,596.65	SB21B.27876
20120823	36,865.33	SB21B.28324
20120824	8,129.65	SB21B.28596
20120828	11,244.62	SB21B.28907
20120905	35,988.64	SB21B.29984
20120907	11,653.12	SB21B.30590
20120912	309.86	SB21B.31718
20120919	3,265.43	SB21B.33527
20120921	587.30	SB21B.33749

8. The Commission requested clarification regarding a credit from Delta Airlines. This credit offsets a previous disbursement. Our Committee has also amended our report to disclose the correct purpose for this disbursement.

9. The Commission requested clarification regarding negative entries disclosed on Schedule B supporting line 21(b) of our report. These entries represent credits appearing on the credit card account of the Committee and do not represent actual cash receipts of vendor refunds, which are disclosed on Schedule A supporting Line 15.

10. The Commission requested clarification regarding reimbursements to individuals for expenses other than travel and subsistence disclosed on Schedule B supporting Line 21(b). All disbursements to individuals disclosed on Schedule B supporting Line 21(b) are either reimbursements for travel and subsistence or in-kind contributions. The Committee has reviewed all reimbursements to individuals for travel and subsistence and confirms that no further itemization is required under any Commission regulations for these expenditures.

11. The Commission requested clarification regarding disbursements to individuals for several descriptions disclosed on Schedule B of our report. All disbursements to individuals for the descriptions named by the Commission are payments

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for goods or services provided by the individuals, where the individuals are the direct service providers, not reimbursements to the individuals.

12. The Commission requested clarification regarding the following descriptions: DONOR MEMENTOS and EQUIPMENT RENTAL.

We have amended our report to clarify these descriptions where necessary.

13. The Commission requested clarification regarding transfers to several joint fundraising committee participants. Our Committee confirms that the full amounts of these transfers were actually transferred to the federal accounts of these committees and were disclosed on their August, September and October monthly reports.

14. The Commission requested clarification regarding contribution refunds. The original contributions from these donors were not itemized because they were received during the period covered by this report and the contribution refunds lowered the aggregate year-to-date contributions from these donors below the required threshold for itemization.

We believe that this response and the accompanying amendments will answer the inquiry from the Commission.

Sincerely,

Keith A. Davis
Treasurer