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September 2, 2014

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

ID#: C00024521

RE: Amended March Monthly Report (2/01/2014 - 2/28/2014), Received 5/19/14

Dear Ms. Juris,

We are in receipt of your letter dated July 30, 2014, regarding the amended March monthly report (02/01/2014 - 02/28/2014), received 05/19/2014, for the American Association for Justice Political Action Committee (AAJ PAC).

Your letter questions a decrease in receipts totaling \$11,973.84 disclosed on our amended March monthly report. The primary reason for this amendment stems from difficulties with our migration to a new database. There were both internal procedures that needed to be refined (based upon our experience with the initial run post conversion) as well as data issues we were not aware of prior to migration.

Following is a summary of the issues we found following the initial run and how the March report for February 2014 was impacted:

The migration to the new database required a change in the credit card and ACH processor with a different settlement period than the previous provider. The original report, filed 3/20/2014, disclosed transactions that ultimately did not settle, that is, no cash was collected for them in February. Prior to migration to the new database, we were unaware that transactions accepted by the system could ultimately be declined several days later. Once we became aware of the problem, we reversed the contributions but this was after the initial report for February was filed with the FEC.

In addition, several January 2014 transactions were improperly included in the February report. Specifically there were some contributions that were appropriately applied to January (and reported to the FEC) but were in a "batch" with a February date. When the batch was posted, the transaction dates for the contributions were assigned to February because of the date assigned to the batch. These contributions were identified and corrected but it was after the initial report was filed with the FEC.

Lastly a number of contributions were reported twice due to donor records with more than one home address; the import was reporting the record twice, once for each address even though the contributor(s) only made a single contribution.

We identified all reporting issues and submitted an amended March report on 05/19/2014 excluding all the transactions that incorrectly overstated the ending cash balance for the month of February 2014.

I trust I have addressed your concerns regarding our amended March report for February 2014. Do not hesitate to contact me with additional questions. AAJ PAC is committed to full compliance with federal election law.

Sincerely,

Heather A. Tureen
Director, AAJ PAC
Treasurer, AAJ PAC

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