

RECEIVED
FEC MAIL CENTER

2009 DEC -2 AM 9: 52



Edison Learning, Inc.
485 Lexington Avenue, 2nd Floor
New York, NY 10017
Phone 212 419-1600
Fax 212 419-1764

December 1, 2009

Federal Elections Commission
999 E Street, NW
Washington, DC 20463
Attention: Kristin DeCarmine

Identification Number: C00413583

RE: Information Request related to 2009 Mid-Year Report for Edison Learning Inc.
Political Action Committee

Dear Ms. DeCarmine:

This correspondence is in response to a letter we received from your office dated October 30, 2009, regarding requests for additional information in three areas of the Mid-Year Report (1/1/09 – 6/30/09). Based on our conversations November 30 and December 1, 2009, listed below are the responses to your inquiries.

1. In the transition from one Treasurer to another in late April 2009 we did not realize that the Year-End Report for 2008 included data beyond the required reporting period. We apologize for this oversight and have enclosed an amended 2008 report covering financial transactions that occurred between 11/25/08 and 12/31/08. We agreed in our conversations that we would amend the Year-End Report for 2008 and not amend the 2009 Mid-Year Report. The following changes were made to the Year-End Report for 2008:
 - a. The reporting period was changed from 1/31/09 to 12/31/08 so that the ending cash on hand for the 2008 report now matches the beginning balance for the 2009 Mid-Year Report - \$54,248.86.
 - b. The January 1, 2008 cash on hand in the originally submitted 2008 Year-End Report did not match the Year-End Report for 2007 due to bank account analysis charges of \$30.29 being deducted out of the starting balance even though they reflected activity after January 1, 2008. We corrected for that in the attached amended 2008 report.
 - c. The November 25, 2008 cash on hand amount of \$52,807.05 in the originally submitted 2008 Year-End Report did not include a \$1,500 contribution reported in the 2008 October 15 Q3 Report. The cash on hand in the amended report was updated to reflect a cash balance of \$54,307.05.

29030194071



EdisonLearning, Inc.
485 Lexington Avenue, 2nd Floor
New York, NY 10017
Phone 212 419-1600
Fax 212 419-1764

2. **Schedule A - The prior Treasurer meant to transfer \$5,000 from the Federal PAC to our Pennsylvania PAC per the maximum of \$5,000 allowed annually. While he wrote the check to transfer money out of the Federal PAC to the Pennsylvania PAC, he mistakenly used the Federal PAC deposit slip (account # 134762436) rather than the Pennsylvania PAC deposit slip (account # 134762444) when he submitted the check. This resulted in the \$5,000 being taken out of the Federal PAC account and being re-deposited into the Federal PAC account. This was not a contribution to the Federal PAC. Enclosed is the cancelled check and deposit slip for your reference.**

3. **Schedule B - The note tried to reflect the fact that the prior Treasurer meant to take \$5,000 out of the Federal PAC account and deposit it into our Pennsylvania PAC account. Instead, he mistakenly used a deposit slip for the Federal PAC. The bank did not notice the error and honored the check. The net effect was that the Federal PAC bank account stayed the same but showed \$5,000 coming out and then going right back into the account. Please refer to the enclosed cancelled check and deposit slip.**

Please contact me if you have any further questions.

Sincerely yours,

Maureen M. Ryan
Treasurer, EdisonLearning Inc. Political Action Committee
212-419-1716
Maureen.Ryan@edisonlearning.com

Enclosures: Amended 2008 Year-End Report
Copy of cancelled check # 1037
Deposit slip

29030194072

2009 DEC -2 AM 9:52

**FEC
FORM 3X**

**REPORT OF RECEIPTS
AND DISBURSEMENTS**
For Other Than An Authorized Committee

Office Use Only

1. NAME OF COMMITTEE (in full)

TYPE OR PRINT ▼

Example: If typing, type over the lines.

12FE4M5

EDISON LEARNING INC. POLITICAL ACTION
COMMITTEE

ADDRESS (number and street)

485 LEXINGTON AVENUE 2ND FLOOR

Check if different than previously reported. (ACC)

NEW YORK

NY

10017-2630

2. FEC IDENTIFICATION NUMBER ▼

CITY ▲

STATE ▲

ZIP CODE ▲

C00413583

3. IS THIS REPORT

NEW (N)

OR

AMENDED (A)

4. TYPE OF REPORT (Choose One)

(a) Quarterly Reports:

- April 15 Quarterly Report (Q1)
- July 15 Quarterly Report (Q2)
- October 15 Quarterly Report (Q3)
- January 31 Year-End Report (YE)
- July 31 Mid-Year Report (Non-election Year Only) (MY)
- Termination Report (TER)

(b) Monthly Report Due On:

- Feb 20 (M2)
- Mar 20 (M3)
- Apr 20 (M4)
- May 20 (M5)
- Jun 20 (M6)
- Jul 20 (M7)
- Aug 20 (M8)
- Sep 20 (M9)
- Oct 20 (M10)
- Nov 20 (M11) (Non-Election Year Only)
- Dec 20 (M12) (Non-Election Year Only)
- Jan 31 (YE)

(c) 12-Day PRE-Election Report for the:

- Primary (12P)
- Convention (12C)
- General (12G)
- Special (12S)
- Runoff (12R)

Election on [] / [] / [] in the State of []

(d) 30-Day POST-Election Report for the:

- General (30G)
- Runoff (30R)
- Special (30S)

Election on [] / [] / [] in the State of []

5. Covering Period

11 / 25 / 2008

through

12 / 31 / 2008

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer

MAUREEN M. RYAN

Signature of Treasurer

Maureen M. Ryan

Date

11 / 30 / 2009

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

Office Use Only

FEC FORM 3X
Rev. 12/2004

29030194073

**SUMMARY PAGE
OF RECEIPTS AND DISBURSEMENTS**

FEC Form 3X (Rev. 02/2003)

Page 2

Write or Type Committee Name

EDISON LEARNING INC POLITICAL ACTION COMMITTEE

Report Covering the Period: From:

11 25 2008

To:

12 31 2008

| | COLUMN A This Period | COLUMN B Calendar Year-to-Date |
|---|-------------------------|-----------------------------------|
| 6. (a) Cash on Hand January 1, <u>2008</u> | | <u>23,600.39</u> |
| (b) Cash on Hand at Beginning of Reporting Period..... | <u>54,307.05</u> | |
| (c) Total Receipts (from Line 19) | <u>0.00</u> | <u>45,500.00</u> |
| (d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)..... | <u>54,307.05</u> | <u>69,100.39</u> |
| 7. Total Disbursements (from Line 31)..... | <u>58.19</u> | <u>14,851.53</u> |
| 8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))..... | <u>54,248.86</u> | <u>54,248.86</u> |
| 9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D) | <u>0.00</u> | |
| 10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D) | <u>0.00</u> | |



This committee has qualified as a multicandidate committee. (see FEC FORM 1M)

For further information contact:

Federal Election Commission
999 E Street, NW
Washington, DC 20463

Toll Free 800-424-9530
Local 202-694-1100

29030194074

DETAILED SUMMARY PAGE
of Receipts

FEC Form 3X (Rev. 06/2004)

Page 3

Write or Type Committee Name

EDISON LEARNING INC. POLITICAL ACTION COMMITTEE

Report Covering the Period: From:

11 / 25 / 2008

To:

12 / 31 / 2008

| I. Receipts | COLUMN A Total This Period | COLUMN B Calendar Year-to-Date |
|---|-------------------------------|-----------------------------------|
| 11. Contributions (other than loans) From: | | |
| (a) Individuals/Persons Other Than Political Committees | | |
| (i) Itemized (use Schedule A)..... | 0.00 | 40,000.00 |
| (ii) Unitemized..... | 0.00 | 45,500.00 |
| (iii) TOTAL (add Lines 11(a)(i) and (ii)).....▶ | 0.00 | 45,500.00 |
| (b) Political Party Committees..... | 0.00 | 0.00 |
| (c) Other Political Committees (such as PACs)..... | 0.00 | 0.00 |
| (d) Total Contributions (add Lines 11(a)(iii), (b), and (c)) (Carry Totals to Line 33, page 5).....▶ | 0.00 | 45,500.00 |
| 12. Transfers From Affiliated/Other Party Committees..... | 0.00 | 0.00 |
| 13. All Loans Received..... | 0.00 | 0.00 |
| 14. Loan Repayments Received..... | 0.00 | 0.00 |
| 15. Offsets To Operating Expenditures (Refunds, Rebates, etc.) (Carry Totals to Line 37, page 5)..... | 0.00 | 0.00 |
| 16. Refunds of Contributions Made to Federal Candidates and Other Political Committees..... | 0.00 | 0.00 |
| 17. Other Federal Receipts (Dividends, Interest, etc.)..... | 0.00 | 0.00 |
| 18. Transfers from Non-Federal and Levin Funds | | |
| (a) Non-Federal Account (from Schedule H3)..... | 0.00 | 0.00 |
| (b) Levin Funds (from Schedule H5)..... | 0.00 | 0.00 |
| (c) Total Transfers (add 18(a) and 18(b)).. | 0.00 | 0.00 |
| 19. Total Receipts (add Lines 11(d), 12, 13, 14, 15, 16, 17, and 18(c)).....▶ | 0.00 | 45,500.00 |
| 20. Total Federal Receipts (subtract Line 18(c) from Line 19).....▶ | 0.00 | 45,500.00 |

29030194075

DETAILED SUMMARY PAGE
of Disbursements

FEC Form 3X (Rev. 02/2003)

Page 4

II. Disbursements

COLUMN A
Total This Period

COLUMN B
Calendar Year-to-Date

| | | |
|--|-------|--------|
| 21. Operating Expenditures: | | |
| (a) Allocated Federal/Non-Federal Activity (from Schedule H4) | | |
| (i) Federal Share | 0.00 | 0.00 |
| (ii) Non-Federal Share..... | 0.00 | 0.00 |
| (b) Other Federal Operating Expenditures | 58.19 | 551.53 |
| (c) Total Operating Expenditures (add 21(a)(i), (a)(ii), and (b)) | 58.19 | 551.53 |
| 22. Transfers to Affiliated/Other Party Committees..... | 0.00 | 0.00 |
| 23. Contributions to Federal Candidates/Committees and Other Political Committees..... | 0.00 | 0.00 |
| 24. Independent Expenditures (use Schedule E) | 0.00 | 0.00 |
| 25. Coordinated Party Expenditures (2 U.S.C. §441a(d)) (use Schedule F)..... | 0.00 | 0.00 |
| 26. Loan Repayments Made..... | 0.00 | 0.00 |
| 27. Loans Made..... | 0.00 | 0.00 |
| 28. Refunds of Contributions To: | | |
| (a) Individuals/Persons Other Than Political Committees | 0.00 | 0.00 |
| (b) Political Party Committees | 0.00 | 0.00 |
| (c) Other Political Committees (such as PACs)..... | 0.00 | 0.00 |
| (d) Total Contribution Refunds (add Lines 28(a), (b), and (c))..... | 0.00 | 0.00 |
| 29. Other Disbursements | 0.00 | 0.00 |
| 30. Federal Election Activity (2 U.S.C. §431(20)) | | |
| (a) Allocated Federal Election Activity (from Schedule H6) | | |
| (i) Federal Share | 0.00 | 0.00 |
| (ii) "Levin" Share..... | 0.00 | 0.00 |
| (b) Federal Election Activity Paid Entirely With Federal Funds | 0.00 | 0.00 |
| (c) Total Federal Election Activity (add Lines 30(a)(i), 30(a)(ii) and 30(b))..... | 0.00 | 0.00 |
| 31. Total Disbursements (add Lines 21(c), 22, 23, 24, 25, 26, 27, 28(d), 29 and 30(c)).. | 58.19 | 551.53 |
| 32. Total Federal Disbursements (subtract Line 21(a)(ii) and Line 30(a)(ii) from Line 31)..... | 58.19 | 551.53 |

29030194076

DETAILED SUMMARY PAGE
of Disbursements

FEC Form 3X (Rev. 02/2003)

Page 5

| III. Net Contributions/Operating Expenditures | COLUMN A Total This Period | COLUMN B Calendar Year-to-Date |
|--|-------------------------------|-----------------------------------|
| 33. Total Contributions (other than loans) (from Line 11(d), page 3) | 0.00 | 455,000.00 |
| 34. Total Contribution Refunds (from Line 28(d)) | 0.00 | 0.00 |
| 35. Net Contributions (other than loans) (subtract Line 34 from Line 33) | 0.00 | 0.00 |
| 36. Total Federal Operating Expenditures (add Line 21(a)(i) and Line 21(b)) | 58.19 | 551.53 |
| 37. Offsets to Operating Expenditures (from Line 15, page 3) | 0.00 | 0.00 |
| 38. Net Operating Expenditures (subtract Line 37 from Line 36) | 58.19 | 551.53 |

29030194077

**SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER:
(check only one)

PAGE **6** OF **6**

21b 22 23 24 25 26
 27 28a 28b 28c 29 30b

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

EDISON LEARNING INC POLITICAL ACTION COMMITTEE

Full Name (Last, First, Middle Initial)

A. JP MORGAN CHASE BANK NA

Mailing Address

PARK AVENUE

City

NEW YORK

State

NY

Zip Code

10017

Purpose of Disbursement

bank account analysis fee

Candidate Name

NA

001

Category/
Type

Office Sought:

House
 Senate
 President

Disbursement For:

Primary General
 Other (specify) ▼

State:

District:

Date of Disbursement

12 / 15 / 2008

Amount of Each Disbursement this Period

58.19

Full Name (Last, First, Middle Initial)

B.

Mailing Address

City

State

Zip Code

Purpose of Disbursement

Candidate Name

Category/
Type

Office Sought:

House
 Senate
 President

Disbursement For:

Primary General
 Other (specify) ▼

State:

District:

Date of Disbursement

Amount of Each Disbursement this Period

Full Name (Last, First, Middle Initial)

C.

Mailing Address

City

State

Zip Code

Purpose of Disbursement

Candidate Name

Category/
Type

Office Sought:

House
 Senate
 President

Disbursement For:

Primary General
 Other (specify) ▼

State:

District:

Date of Disbursement

Amount of Each Disbursement this Period

SUBTOTAL of Disbursements This Page (optional)..... ▶

58.19

TOTAL This Period (last page this line number only)..... ▶

58.19

29030194078

Chase Online

Details for COMMERCIAL CHECKING (...2436)

| | | | |
|-----------------------|-------------|---------------------------|--------|
| Present Balance | \$48,881.79 | Uncollected funds – Total | \$0.00 |
| Available Balance | \$48,881.79 | | |
| Available Credit | \$0.00 | | |
| Available Plus Credit | \$48,881.79 | | |

Show me...

All Transactions

Transaction Results (1 - 6) for COMMERCIAL CHECKING (...2436)

Search Transactions

| Date | Type | Description | Debit | Credit | Balance |
|------------|-------------|------------------------------------|------------|------------|-------------|
| 05/15/2009 | Misc. Debit | ACCOUNT ANALYSIS SETTLEMENT CHARGE | \$83.84 | | \$48,881.79 |
| 04/15/2009 | Misc. Debit | ACCOUNT ANALYSIS SETTLEMENT CHARGE | \$72.07 | | \$48,965.63 |
| 04/13/2009 | Check | CHECK # 1037 (view) | \$5,000.00 | | \$49,037.70 |
| 04/10/2009 | Deposit | DEPOSIT ID NUMBER 304991 (view) | | \$5,000.00 | \$54,037.70 |
| 04/02/2009 | Check | CHECK # 1036 (view) | \$2,000.00 | | \$49,037.70 |
| 03/25/2009 | Check | CHECK # 1035 (view) | \$1,000.00 | | \$51,037.70 |

© 2009 JPMorgan Chase & Co.

29030194079

Chase Online

COMMERCIAL CHECKING (...2436)

Check Number: 1037

Post Date: 04/13/2009

Amount of Check: \$5,000.00

| | | |
|--|---|-----------------------|
| EDISON SCHOOLS INC. POLITICAL ACTION COMMITTEE 521 FIFTH AVE. FL. 11 NEW YORK, NY 10175 | | 1037 |
| DATE <u>4/8/09</u> | | 13 210 |
| PAY TO THE ORDER OF | <u>Edison Schools Inc. Pennsylvania PAC</u> | \$ <u>5,000.00</u> |
| | <u>Five thousand</u> | <u>00/100</u> DOLLARS |
| CHASE JPMorgan Chase Bank, N.A. 60 Pine Avenue New York, NY 10017 | | |
| FOR | <u>PA PAC STOPPED</u> | <u>[Signature]</u> |

Need help printing or saving this check?

JPMorgan Ch
04102009

Need help printing or saving this check?

© 2009 JPMorgan Chase & Co.

29030194080

Chase Online

COMMERCIAL CHECK

Deposit Number: .

Post Date: 04/10/2009

Amount of Deposit: \$5,000.00

| | | | | |
|---|--------------------------------------|----------------|---------|--|
| CHASE | | DEPOSIT | | CHECKING <input checked="" type="checkbox"/> |
| | | | | SAVINGS <input type="checkbox"/> |
| Today's Date | Customer Name | | | |
| 4/08/09 | Edison schools Inc, Pennsylvania PAC | | | |
| Customer Address | | | | |
| 521 Fifth Ave. 11th Floor | | | | |
| City, State, Zip | | | | |
| New York, New York 10175 | | | | |
| Sign Here (if cash is received from this deposit) | | | | |
| X | | | | |
| <small>DEPOSITS MAY NOT BE AVAILABLE FOR IMMEDIATE WITHDRAWAL. Checks and other items received for deposit subject to the provisions of the Uniform Computer Code and your Deposit Account Agreements with Chase.</small> | | | | |
| <small>Start your account number here</small> | | | | |
| | CASH | | | |
| | CHECK | Bank by Mail | 5000.00 | |
| | TOTAL FROM OTHER SIDE | 0 2009 | | |
| | SUBTOTAL | Teller #4 | 5000.00 | |
| | LESS CASH | | 0.00 | |
| | TOTAL \$ | | 5000.00 | |

Need help printing or saving this deposit slip?

FEDERAL PAC ACCOUNT NUMBER

Chase Bank, NA
04102009

Need help printing or saving this deposit slip?

© 2009 JPMorgan Chase & Co.

29030194081

Federal Election Commission
ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS
 The FEC added this page to the end of this filing to indicate how it was received.

Hand Delivered Date of Receipt

USPS First Class Mail Postmarked

USPS Registered/Certified Postmarked (R/C)

USPS Priority Mail Postmarked
 Delivery Confirmation™ or Signature Confirmation™ Label

USPS Express Mail Postmarked

Postmark Illegible

No Postmark

Overnight Delivery Service (Specify): *UPS* Shipping Date
12/1/09
 Next Business Day Delivery

Received from House Records & Registration Office Date of Receipt

Received from Senate Public Records Office Date of Receipt

Received from Electronic Filing Office Date of Receipt

Other (Specify): Date of Receipt or Postmarked

 *12/2/09*
 PREPARER DATE PREPARED

29030194082