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July 30, 2013

Ms. Sarah Juris
Campaign Finance Analyst
Federal Election Commission
Washington, DC 20463

Committee ID: C00521013
RE: 48-Hour Notification Report, Received by the FEC 9/3/12

Dear Ms. Juris,

I am writing as counsel to Florida Freedom PAC (FFP) in response to the Commission's request for additional information related to an item disclosed on the committee's 48-Hour Notification Report received September 3, 2012.

The Commission has asked about 48-hour notices for independent expenditures in which the vendor names disclosed on the 48-hour notice do not match what was disclosed on Schedule E, supporting line 24 for that period. When the committee originally filed 48-hour notices for independent expenditures to disclose canvassing activity, the notices contained estimates for what the anticipated month's activity would be, and used "Florida New Majority" as the vendor name, as it was unknown at the time that the estimates were filed who the actual vendors would be. The committee has since filed an amended October Quarterly report on 2/14/2013 which reflects a more detailed and accurate itemization of the 48-hour notices that were previously filed.

Please note that in both memo entries to FFP reports (see, e.g., amended Post-General Election Report filed February 14, 2013) and in responses to previous Requests for Additional Information (see responses filed on October 11, 2012, February 14, 2013 (two), and March 19, 2013) FFP has previously provided essentially this same explanation for the discrepancies between 48-hour notices filed by FFP and subsequently filed reports showing the same expenditures being made to different vendors. (In addition, as noted in the October 11 2012 RFAI response, I have personally previously urged the Commission to address the problems of reporting for groups engaged in canvassing and similar operations. See comments September 2011 in response to the Commission Draft Interpretive Rule on When Certain Independent Expenditures).

FFP believes that this approach of reporting estimated expenditures in its 48-hour reports and then filing subsequent reports with more detailed listings of the individual canvassers and other vendors best meets the policy goals of the 48-hour reporting requirements by providing the Commission, candidates, and the general public with timely notice of the targets and amounts of independent expenditures even though the names of individual canvassers and other vendors are not disclosed in the 48-hour reports.

If you have any further questions regarding this matter, please feel free to contact me at 202-328-3500.

Very truly yours,
John Pomeranz
Counsel to Florida Freedom PAC

cc: Gihan Perera, Treasurer, Florida Freedom PAC