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November 12, 2012

Ms. Maureen Benitz  
Senior Campaign Finance & Reviewing Analyst  
Reports Analysis Division  
Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

Dear Ms. Benitz:

This is in response to your letter of November 8, 2012, regarding the July Monthly Report (6/1/12 - 6/30/12) for the Virginia Leadership PAC.

As we notified you in October 2010, the San Pablo Lytton Casino is not an incorporated entity. We are in receipt of a letter from the General Counsel for the Lytton Rancheria of California, a federally recognized Indian Tribe. The letter stated:

""All contributions from San Pablo Lytton Casino checking account are made on behalf of the Tribe. The Casino is solely owned and operated by the Tribe, is not incorporated under Tribal or State law, and is viewed as a Tribal government gaming operation.""

Based on this, we believe the contribution is permissible.

If you need any additional information, please let me know.

Sincerely,

Vickie L. Winpisinger  
Assistant Treasurer