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August 29, 2013

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

Committee ID: C00521013

RE: Amended 12 Day Pre-General Report (10/01/2012-10/17/2012), Received by the FEC 03/19/2013

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 items disclosed on the committee's Amended 12 Day Pre-General Report which the FEC received on 03/19/2013.

The Commission has asked about a decrease in receipts on Line 11(c) and decrease in disbursements on Lines 21(b) and 24.

Regarding the decrease in receipts, the in-kind receipt amount originally disclosed from Service Employees International Union PEA-Federal was reported as an estimate of in-kind costs for salary and other canvass-related activities, while the receipt amount reported on the amended report in question reflects the actual amount spent. Likewise, the difference in the disbursement amounts on Line 21(b) pertain to the disbursement side of this same in-kind contribution. Further, regarding the decrease in disbursements on Line 24, prior Pre-General reports filed for FFP reflected estimates of salary and other canvass-related costs, while again, the report in question reflects the actual amounts spent.

The Commission has asked about 48-hour notices for independent expenditures which were not itemized on the amended Pre-General report, as well as 48-hour notices disclosed on Schedule E that appear to not have been filed. 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. Thus, both payment amounts and actual vendors differ between the original estimates reported and the actual activity that has been disclosed on the amended Pre-General report in question. This report 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), March 19, 2013 and July 30, 2013) FFP has previously provided essentially this same explanation for the discrepancies between 48-hour notices filed by FFP and subsequently filed reports. In addition, it is my understanding that in response to a question at the recent regional conference the Commission held in Austin, Texas, that Mike Hartsock, a Branch Chief with the Commission's Reports Analysis Division, suggested just the approach FFP has taken: Filing 48-hour notices with estimated expenditures and then filing more accurate information in subsequent reports. While such a statement by Commission staff is certainly not binding on the Commission, it does offer some greater confidence that the approach taken by FFP was reasonable, despite the repeated questions about it in this and earlier RFAs.

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

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