

Re: Amended 30-Day Post-General Report (10/16/08 - 11/24/08), received 12/5/08

The Commission's letter to Campaign for Working Families PAC ("CWF") dated April 29, 2009 requested further information regarding a transfer of \$10,000 that appeared on the committee's 30-Day Post-General Report. The transfer in question was a transfer to a non-federal account maintained by CWF.

CWF pays all administrative expenses of that non-federal account using 100 percent federal funds, except that since September 2007, it has paid the consulting fees for three consultants using a ratio of 50 percent federal funds to 50 percent non-federal funds. This ratio of federal to non-federal funds is consistent with the requirements of 11 CFR 106.6(c) (nonconnected committees must pay administrative expenses "with at least 50 percent Federal funds ."). CWF's non-federal account has paid its 50 percent share of those consulting fees by direct payments to each of the three consultants, and CWF's federal account has done the same. CWF now intends to establish a separate allocation account, pursuant to 11 CFR 106.6(e)(1)(ii). Beginning immediately, CWF will use that allocation

account to collect funds from both the federal and non-federal accounts and in turn to pay the consulting fees. Payments of the consulting fees will continue to be made with at least 50 percent federal funds but will be made through the new allocation account. CWF will operate the allocation account and report its activities pursuant to 11 CFR 106.6(e).

In addition, CWF proposes to amend its year-end report for 2007 and all reports filed since then, as follows:

" For each report, CWF will indicate in Schedule H1 that it used the flat minimum federal percentage of 50% to allocate consulting fees;

" For each report, CWF will itemize in Schedule H4 the disbursements it made for allocated activities;

" For each report, CWF will make any appropriate adjustments to Lines 18 and 21 of the Detailed Summary Page of Disbursements.

" In lieu of filing Schedule H3, CWF will include memo text in each amended report reflecting the payments made from the non-federal account to pay the non-federal share of the allocated consulting fees.

Please let us know whether you require further information.
