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August 7, 2012

Allen Norfleet
Senior Campaign Finance Analyst
Federal Election Commission
999 E St., NW
Washington, DC 20463

Identification Number: C00448696

Reference: February Monthly Report (1/1/12-1/31/12)

Dear Mr. Norfleet:

This letter is in response to your request for additional information, dated July 3, 2012.

1. Per our discussion today, the Committee is in the process of amending all reports filed in calendar year 2012 to fully itemize every earmarked receipt on Schedule A and Schedule B. As we discussed, the Committee believes that this itemization is in direct conflict with regulation 104.8, which only requires the itemization of contributors whose contributions have exceeded \$200 in the aggregate in the calendar year. In addition, the Committee uses Aristotle, an FEC approved software, to file all of its reports. Aristotle does not itemize earmarked contributions, requiring that every filing be submitted to Aristotle for additional programming prior to filing. This is an extremely time consuming process. The Committee intends to file all amendments prior to filing the August monthly report, due by 8/20/12.
2. As we discussed and as was noted in the Committee's response dated July 30, 2012, all independent expenditures to Ted Cruz noted on page 1 of your attachment were filed on a 48 hour notice filed 1/4/12. The Committee subsequently amended the 48 hour notice filing on 4/2/12. The original filing of these independent expenditures was within the 48 hour notice filing period.
3. The \$7365 paid to Red Sea LLC, as media production for Ted Cruz, was filed on the 4/2/12 amended 48 hour notice discussed above in item 2. This was in invoice that was not received until March, but the Committee believed the cost had been included in the original 48 hour notice filing on 1/4/12. The payment to Red Sea LLC of \$7365 is disclosed on the April Monthly report with a notation that the public dissemination date was 1/17/12-this is the date disclosed on the amended 48 hour notice filed 4/2/12, at the direction of the Commission.

The \$8665 paid to Red Sea LLC, as media production for Don Stenberg, was filed on the 4/2/12 amended 48 hour notice to the original notice filed on 1/4/12. This was in invoice that was not received until March, but the Committee believed the cost had been included in the original 48 hour notice filing on 1/4/12. The payment to Red Sea LLC of \$8665 is disclosed on the April Monthly report with a notation that the public dissemination date was 1/3/12-this is the date disclosed on the amended 48 hour notice filed 4/2/12, at the direction of the Commission.

4. All expenses disclosed on Schedule B, Line 21(b), regardless of description, are operating expenditures of the Committee and did not contain express advocacy for or against any Federal candidates. If they were in kind contributions to other federal committees, they would be disclosed on Schedule B, Line 23, as required by the regulations. If these were independent expenditures and contained any communications that clearly referred to or identified any Federal candidates, they would have been disclosed on Schedule E, Line 24. The Committee has always reported and will continue to report these expenses correctly.

Sincerely,

Lisa Lisker
Treasurer