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December 3, 2013

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Reports Analysis Division

Re: Amended 12 Day Pre-Special Report (04/11/2013 - 06/05/2013), Received 07/25/2013

On behalf of our client, CE Action Committee (?Committee?), this letter responds to your request for additional information dated October 29, 2013, regarding the Committee?s amended 12 Day Pre-Special General Report, filed July 25, 2013.

Items 1, 3, and 4: Your letter requests information related to an increase in debts owed on the Committee?s amended 12 Day Pre-Special General Report (Item 1). Your letter also requests information on late-filed 24 and 48 hour independent expenditure reports for 5 expenditures (Items 3 &4). The Committee?s responses to these requests are related. The Committee engaged the services of several consultants and vendors over the short time period between its founding on February 11, 2013, and the June 25, 2013, Massachusetts Special Election. The Committee made significant efforts to gather timely information on services provided by its vendors and the associated costs, but some vendor invoices have been received by the Committee containing expenses related to activities disclosed on previously filed reports. When the Committee became aware of these additional expenditures, the Committee amended its 12-Day Pre-Special General Report and relevant 24 and 48 hour independent expenditure reports to include the debt item listed in Item 1 of your letter and the independent expenditures listed in Items 3 and 4.

Item 2: Your letter requests information on two expenditures appearing on a 24 hour independent expenditure report but not appearing on Schedule E of the Committee?s 12 Day Pre-Special General Report. The two expenditures did not appear on the Committee?s original 12 Day Pre-Special General Report, filed June 13, 2013, for similar reasons contained in the response to Items 1, 3, and 4 above?the Committee learned about the dissemination of the expenditures from the vendor after the original 12 Day Pre-Special General Report was filed. The Committee added these expenditures to the first amendment to that report filed on June 21, 2013.

On July 25, the Committee filed a second amended 12 Day Pre-Special General Report to address a separate issue, and the two expenditures?which had appeared on the original amended 12 Day Pre-Special General Report?were inadvertently omitted from the second amended report, the Committee believes, due to a technical error in its filing software. The Committee has filed an amended 12 Day Pre-Special General report simultaneously with this response that returns these two expenditures to Schedule E and thereby corrects this inadvertent omission.

Item 5: Your letter requests clarification on the purpose descriptions for several expenditures listed on Schedule E of the Committee?s 12 Day Pre-Special General Report. The Committee?s amended 12 Day Pre-Special General report, filed simultaneously with this response, adds clarifying descriptions for the relevant expenditures on Schedule E.

Item 6: Your letter requests information on expenditures to four vendors, each containing a ?date? field on a 48 hour report entry that does not match the ?date? field on Schedule E of the Committee?s 12 Day Pre-Special General Report. The Committee initially understood the Reports Analysis Division?s advice to be that the Schedule E ?date? field for an expenditure that was disseminated in the current period but not yet paid should list the invoice or accrual date for the expenditure. The Committee followed that guidance for the report that is the subject of your letter. The Reports Analysis Division has since clarified that the date of dissemination should be used in this circumstance, rather than the accrual date, and then updated to the payment date in the period when payment occurs. The Committee?s amended 12 Day Pre-Special General

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report, filed simultaneously with this response, changes the ?date? field for the Schedule E expenditures to comply with the Division?s recent guidance.

The Committee notes that seven expenditures related to the four vendors referenced in your letter no longer appear on the amended 12 Day Pre-Special General report filed along with this response. These expenditures have dissemination dates that fall in a subsequent reporting period, but were inadvertently listed on the amended 12 Day Pre-Special General report filed on July 25 because the Committee?s use of the accrual date rather than the dissemination date, caused the filing software to pull the expenditures into the 12 Day Pre-Special General reporting period. The Committee has filed an amended 30 Day Post-Special General report simultaneously with this letter to reflect that the following seven expenditures were disseminated in the period covered by that report:

Tigercomm: \$4,280 expenditure, dissemination date 6/11/2013
Tigercomm: \$4,220 expenditure, dissemination date 6/14/2013
Markham Group: \$30,000 expenditure, dissemination date 6/10/2013
Markham Group: \$30,000 expenditure, dissemination date 6/13/2013
Sadler Strategic Media: \$9,100 expenditure, dissemination date 6/14/2013
Sadler Strategic Media: \$31,100 expenditure, dissemination date 6/23/2013
Social Stream Media: \$20,500 expenditure, dissemination date 6/11/2013

Item 7: Your letter requests clarification on the election designations on the expenditures listed on Schedule E of the Committee?s 12 Day Pre-Special General Report. The Committee?s amended 12 Day Pre-Special General report, filed simultaneously with this response, includes updated election designations for the expenditures on Schedule E.

Respectfully submitted,

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