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NAME OF COMMITTEE (In Full)
Rebuilding America Now

FEC IDENTIFICATION NUMBER
C00618876

Mailing Address PO Box 26141

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| City | State | ZIP Code |
| Alexandria | VA | 22313 |

March 19, 2019

Federal Election Commission
Reports Analysis Division
999 E Street, NW
Washington, DC 20463

Re: Response to February 12, 2019 RFAI – Rebuilding America Now (ID C00618876)

Dear Sir or Madam,

This letter is in response to the Request for Additional Information (RFAI) dated February 12, 2019 with respect to the Amended 30-Day Post-General Report (10/20/2016 - 11/28/2016) filed on behalf of the aforementioned Committee on 11/02/2018.

1.The Amended 30-Day Post-General Report filed on 11/02/2018 disclosed additional detail regarding a single contribution received by the committee immediately prior to the November 2016 general election. A contribution in the amount of \$1,000,000 had been received from a particular donor on 10/20/2016, and properly disclosed on line 11AI the original 30-Day Post-General Report filed 12/8/2016. A second contribution - from the same donor for the same amount - was also received by the Committee eleven days later, on 10/31/2016, but was not initially included in the original 30-Day Post-General Report filed 12/8/2016 because it appeared at the time by the Treasurer to be a duplicate entry from the prior identical 10/20/2016 contribution.

2.In preparing the Year-End 2016 Report, and reviewing and reconciling the December 31, 2016 year-end bank statements and the bank statements and activity of the Committee the period since the October 2016 Quarterly Report, the Treasurer determined that there were in fact two contributions from the same donor for the same amount both received by the Committee in late October 2016. The additional 10/31/2016 contribution for \$1,000,000 was entered by the Treasurer into the FEC filing software system (Crimson Filer) utilized by the Committee for internal accounting and FEC reporting, and the Year-End 2016 report was timely filed on 2/01/2017 with year-end balances that reconciled with the year-end bank records of the Committee. The Treasurer believed at the time that by adding the additional 10/31/2016 in connection with the preparation and filing of the Year-End 2016 Report and selecting previously unreported transactions covering the period since the October 2016 Quarterly Report, that the additional detail for the 10/31/2016 contribution would be included and disclosed in the Year-End 2016 Report, particularly since the beginning and ending year-end reported cash on hand in the disclosure report reconciled with the 2016 bank records of the Committee.

3.While conducting a routine review of all the prior filings and an internal audit of the financial records of the Committee in late September of 2018 in advance of the 2018 General Election (during which the Committee was not active in conducting electioneering activities), the Treasurer re-reviewed the prior 2016 Pre-General and 2016 Post-General filings, as well as the Year-End 2016 Report, and determined that while the year-end cash on hand balances for the Year-End 2016 Report and the starting balances for the Mid-Year 2017 reports appeared to be correctly reported, and the value of the contribution was included within the Committee's reported cash-on-hand balances, the additional 10/31/2016 contribution was not itemized and did not appear properly in the previously filed Year-End 2016 Report. Quickly after the inadvertent omission of itemized detail regarding the single 10/31/2016 contribution from the prior election cycle was identified, the Treasurer filed a sua sponte amendment to the 30-Day Post-General Report to correct the inadvertent omission and to provide clarity for the public record. In response to the filing of this amendment to the 30-Day Post-General Report filed on 11/02/2018, the Committee received a RFAI letter dated February 12, 2019, three months later.

The Committee and Committee Treasurer are committed to making every effort to comply with applicable federal campaign finance laws, and to quickly file any amendments

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to prior reports as soon as inadvertent errors or omissions are identified without waiting for any formal enforcement proceedings from the FEC. The Treasurer has since taken steps to address the way contributions are entered and FEC reports are filed, including to multiple independent review by other attorneys for the Committee and Committee representatives prior to filing future reports or amendments, in order to ensure that all contributions and expenditures that relate to the activities of the Committee are properly disclosed in the reports of the Committee moving forward.

If you have any additional questions, or require any further information or documentation in connection with the matters identified in this response to this RFAI or the reports and disclosures of the Committee, please do not hesitate to contact me.

Very truly yours,

Ryan R. Call, Esq.
Treasurer, Rebuilding America Now