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July 17, 2013

Christopher J. Morse
Senior Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Re: Request for Additional Information for May Monthly Report of NEA Fund for Children and Public Education, ID# C00003251

Dear Mr. Morse:

In a letter dated June 12, 2013, you requested additional information to clarify why the NEA Fund for Children and Public Education's ("FCPE") disclosed in its May 2013 monthly report a refund to an operating expenditure not previously disclosed in any report by FCPE. This letter is in response to your request.

Your letter correctly notes that Schedule A, supporting Line 15 of FCPE's May 2013 Monthly Report discloses an offset to an operating expenditure totaling \$2,890.00 from Envision Communications even though FCPE did not recently disclose a disbursement to that entity. As we explain in greater detail below, that refund should have been disbursed to, and deposited by, an Independent Expenditures Committee?the NEA Advocacy Fund (C00489815)?that shares a sponsoring organization with the FCPE. The problem has now been rectified, as shown in FCPE?s June 2013 Monthly Report.

In past election cycles, FCPE has made numerous disbursements to Envision Communications for independent expenditures. See, e.g., FCPE 24-Hour Report filed Oct. 22, 2010 (<http://images.nictusa.com/pdf/096/10991790096/10991790096.pdf>); FCPE 24-Hour Report filed Oct. 6, 2010 (<http://images.nictusa.com/pdf/600/10991241600/10991241600.pdf>).

On September 20, 2012, NEA Advocacy Fund?not FCPE?made a disbursement to Envision Communications in the amount of \$16,396.57, for an independent expenditure in an election for state office in Montana. That disbursement was correctly reported in NEA Advocacy Fund's October 2012 Quarterly Report (see Schedule B, page 12). But, as a result of an administrative error, Envision Communications mistakenly made out the check to FCPE when it issued a partial refund of \$2,819.00 in connection with that independent expenditure. Not noticing the error at the time, FCPE deposited the refund on April 5, 2013, and reported it as an offset to a previous expenditure on its May 2013 Monthly Report.

Once FCPE became aware of this mistake, it promptly disbursed the refund totaling \$2,819.00 back to the Envision Communications on May 31, 2013, requesting that the refund be properly re-issued to the NEA Advocacy Fund. FCPE reported this disbursement on its June 2013 Monthly Report, noting that the refund check was written to the wrong committee (See Schedule B, page 58). Envision Communications issued a new refund check to the NEA Advocacy Fund on June 20, 2013.

If you have any additional questions or concerns, please feel free to contact us at (202) 822-7035.

Sincerely,

Jason Walta
Paisly Bender*

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Legal Counsel for NEA Fund for Children and Public Education

cc: Michael McPherson, Treasurer, NEA Fund for Children and Public Education

*Law Fellow. Admitted only in Virginia; practice limited to matters before federal agencies and providing advice as internal counsel.
