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This Memo is in reply to RFAI dated June 19, 2012 referencing Form 1M.

We agree with your finding that the Form 1M was filed in error.

Each quarter we run a process within the Complete Campaigns software to determine if a PAC has reached multi-candidate status. In our 2nd quarter run it indicated Freedom PAC had done so.

After receiving your RFAI, we followed up with Complete Campaigns, and their explanation of the software error is as follows:

After looking into this, it appears there was a bug in the system regarding that qualification date that has since been resolved.... It appears this report should not have been filed, as there weren't enough transactions to warrant it.

Per our discussions with the analyst who sent the RFAI, we are filing this Form 99 Memo to ask that the multi-candidate status for Freedom PAC be removed from the FEC records.
