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PAGE 1 / 2

NAME OF COMMITTEE (In Full)  
Americans for Prosperity

FEC IDENTIFICATION NUMBER  
C90013285

Mailing Address 1310 North Courthouse Rd  
Suite 700

City	State	ZIP Code
ARLINGTON	VA	22201

Bradley Austin  
Senior Campaign Finance Analyst  
Federal Election Commission, Reports Analysis Division  
(202) 694-1196

September 27, 2018

Dear Mr. Austin:

We are writing in response to your Request for Additional Information ("RFAI"), dated August 22, 2018 regarding our 2018 July Quarterly Report. Below, please find our responses to your requests for further information. Items 2-4 have been combined, as they relate to the same set of transactions.

#### 1. Contributor Information

First, in item 1, you requested additional information pertaining to the fact that this report discloses disbursements made for independent expenditures, but no contributions made to further the independent expenditures. As you note, persons who are not political committees but who make independent expenditures must identify each person who makes a contribution in excess of \$200 for the purpose of furthering the reported independent expenditure. 11 C.F.R. § 109.10(e) (1)(vi). Americans for Prosperity received no such contributions, and therefore had no contributions to report.

Section 30101(8)(A)(i) of the Act defines "contribution" with an element of intent: "... anything of value made by any person for the purpose of influencing any election for Federal office." The Commission regulation cited above further emphasizes that intent by requiring reporting of only those who contributed for the purpose of furthering the reported independent expenditure. The assumption that, simply because we reported disbursements, there were also contributions that should have been reported is inconsistent with the statute and contrary to the language of the Commission's regulation cited above. The issuance of RFAs for information that is not required under the Act or regulations is a waste of taxpayer time and money, causes confusion within the regulated community, and provides no informational benefit to the public.

#### 2. 24-Hour Report

Next, in items 2-4, the Commission requested additional information regarding two 24- hour reports filed on June 6, 2018, reporting activity that occurred on June 5, 2018. On June 5, 2018, AFP reported expenditures to i360, LLC, for phone banking in the amount of \$94,479.93, and to In Pursuit Of for "Digital Ad Placement-Healthcare" in the amount of \$20,000.00. As is common on 24-hour reports, the costs were estimates of the total cost of the respective expenditures, to be corrected as necessary on the next regularly scheduled report. Unfortunately, the vendor names were switched and reported incorrectly on the June 6, 2018 24-hour Report. The correct recipients of the expenditures were corrected on the July Quarterly (In Pursuit Of, \$14,414.00; i360, LLC \$91657.58), with updated actual costs, the differences of which were de minimus.

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Sincerely,

Victor Bernson, General Counsel Americans for Prosperity C90013285