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August 12, 2014

Kevin Fortkiewicz  
Campaign Finance Analyst  
Reports Analysis Division

Identification Number: C00477653  
Reference: Amended May Monthly Report

Dear Mr. Fortkiewicz:

I am writing in response to your July 29, 2014 letter concerning CoxPACs Amended May Report filed with the Commission on June 20, 2014. In your letter, you asked CoxPAC to provide supplemental information regarding why an additional \$54,469.30 in receipts was not included on its original report.

The additional receipts were not disclosed on the original May report due to an error made by Coxs payroll department. This error manifested itself in the first payroll deductions following Coxs spring PAC solicitation campaign. CoxPACs internal procedures end all PAC payroll deductions at the end of each calendar year. The following March, employees are re-solicited and re-enroll in CoxPAC. Following that solicitation, Coxs payroll department compiles the PAC deduction files and PAC payroll deductions resume. Throughout the year, the payroll department provides CoxPACs third-party vendor with weekly payroll deduction reports used for tracking and reporting purposes.

During the reconciliation of CoxPACs bank account, it was discovered that the PAC had received deposits which did not match payroll deduction reports provided to our third-party vendor. While researching this discrepancy, it was discovered that an error occurred in the payroll department in April at the time CoxPAC renewed payroll deductions following its March solicitation. During this time, the payroll department failed to report to the third-party vendor the PAC deductions taken on April 11th and April 15th the first deductions of 2014.

The error was discovered in June and we immediately updated CoxPACs receipt records and prepared the Amended May Report in order to properly disclose the PAC activity.

We have worked closely with our payroll department to improve the PAC deduction report preparation procedures with the intent of ensuring all PAC payroll deductions are provided to our third party vendor. And, an additional step was established, whereby CoxPACs vendor verifies that the total deposited in the bank matches the total of the PAC deduction report it receives. The payroll department has made the requested changes and we are confident that this mistake will not occur again.

CoxPACs goal is to file accurate and timely reports that meet all FEC disclosure regulations. We hope this explanation of why the receipts were not included in the original report, and our enhanced efforts to improve accuracy in the future, illustrate that CoxPACs intent is always to fully itemize and disclose contribution data properly.

We hope this is an adequate response to your July 29, 2014 letter.

Sincerely,

Joab M. Lesesne, III, Treasurer

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