

October 29, 2010

Mr. Allen Norfleet
Senior Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street NW
Washington DC 20463

Identification Number: C00449280

Dear Mr. Norfleet:

This letter responds to your letter dated October 8, 2010, regarding the September Monthly Report (8/1/2010-8/31/10), which Free and Strong America PAC, Inc. filed on September 17, 2010.

Our answers to your inquiries are as follows:

1. With respect to your first inquiry, Free and Strong America PAC, Inc. is familiar with the contribution limits set forth in the Act. 2 U.S.C. s441a(f) and 11 CFR ss110.1(d) and 110.2(d). As the Commission correctly notes, if any contribution received exceeds the limits, Free and Strong America PAC, Inc. can retain the funds if within 60 days of receipt (1) the excessive amount is properly reattributed to another person, such as a joint account holder, by obtaining signed written authorization from each person making the contribution pursuant to 11 CFR 110.1(k)(3), and (2) the treasurer informs the person making the contribution that he or she may request the return of the excessive portion of the contribution if it is not intended to be a joint contribution, and honors any such request for a refund.

In accordance with these rules, we sought reattribution of each of these contributions within the permitted 60 day period, and indicated that we were so doing in our September Monthly Report with respect to the contributions of Mr. Smithburg, Mr. Torres, Mr. Waldron, and Mr. Wehrly with the notation on each of these contribution records of "Reattribution Requested."

In the case of Mr. Jay, we were notified shortly before we filed the September Monthly report that a refund of the excess funds was requested, and indicated that we would be doing so in our September Monthly Report with a notation on his contribution record stating "Refund to be Issued." Similarly, in the case of Mr. Lynch, we were notified shortly after his contribution that he wanted the excess funds charged back to his credit card. We immediately honored his request, and indicated that we had done so on our September Monthly Report with a notation on his contribution record stating "Chargeback Issued on 9/2/2010."

We understand that we should report any reattributions as memo entries on Schedule A of the report covering the period during which the authorization for the reattribution is received, and any refunds should be disclosed on Schedule B supporting Line 28 of the report during which the transaction was made. In fact, we have already reported each of the reattributions (i.e., Smithburg, Torres, and Waldron), refunds (i.e., Jay and Wehrly) and the chargeback (i.e., Lynch) in question on our October Monthly Report (9/1/10-9/30/10). For your convenience, we will mail you a photocopy of the refund checks in question with the account information redacted.

2. With respect to your second inquiry, Free and Strong America PAC, Inc. has amended its September Monthly Report on October 19th to clarify the descriptions in question.

3. With respect to your third and fourth inquiries, Free and Strong America PAC, Inc. has reviewed the relevant

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reimbursements for travel and subsistence advances and the regulations governing disbursement reporting, and believes that all such transactions were properly reported pursuant to 11 CFR 104.9, 11 CFR 104.10, and 11 CFR 104.17, as well as other relevant regulations, and therefore, no amendment is necessary.

Thank you for your assistance on these matters. Please do not hesitate to contact us if you have any questions.

Sincerely,

Darrell Crate
Treasurer