

**A-G79 @B9CI G'H9LH'fl 97 : cfa ' - - t**

In an RFAI dated March 12, 2015, pertaining to the Pre-General Report (10/1/14 - 10/15/14), the FEC seeks clarification regarding five itemized independent expenditures that had listed dissemination dates earlier than the actual payment dates. Similar to the RFAI responses submitted on February 24, 2015 regarding the Post-General Report and the Pre-Primary Report, the payments in question (RFAI Attachment Page 1) were to sign distributors who sporadically showed up for payment based on the number of hours they indicated they had worked, and there was no written contract involved.

Under the law as Space PAC understands it, these payments did not become independent expenditures until the payment date. Therefore, they did not trigger reporting requirements until payment (the disbursement date on the related reports).

The five expenditures with an estimated dissemination date of October 6, 2014 (Attachment 1) had a payment date of October 15, 2014 and were reported on the 48 Hour Notice dated October 15, 2014 when the aggregate additional expenditures reached \$10,000. Thus, all five of these small amounts were reported before the election in question.

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