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April 2, 2013

Ms. Alexandra Broomhead
Senior Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Dear Ms. Broomhead:

Re:File # C00484253, October Monthly Report

This letter responds to your request for additional information, dated February 26, 2013, regarding the October monthly report filed by the United Food & Commercial Workers International Union Working Families Advocacy Project (UFCW WFAP).

As noted in the request, UFCW WFAP originally filed a 48-hour report on September 18, 2012 disclosing independent expenditure opposing Mitt Romney and independent expenditures opposing Josh Mandel, attributing to each a September 17 dissemination date. UFCW WFAP did so at that time because it believed the information to be correct. UFCW WFAP promptly afterward determined the following different facts:

The reported Romney independent expenditures were disseminated on September 12; and

The reported Mandel independent expenditures were disseminated on September 18, and additional independent expenditures were disseminated on September 13.

UFCW WFAP immediately amended its 48-hour report accordingly, on September 26. UFCW WFAP discovered these errors because it was continuously monitoring its activity to ensure that all reporting requirements were met. We would point out that the Romney independent expenditures inadvertently were reported four days late; most of the Mandel independent expenditures were reported one day before dissemination; and the remainder of the Mandel independent expenditures inadvertently were reported 11 days late. In all cases UFCW WFAP accurately and fully reported the independent expenditures well before the election, and then reported them accurately and fully again on its October monthly report.

Thank you for your consideration.

Sincerely,

Anthony M. Perrone

International Secretary-Treasurer