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This submission responds to the Commission's letters of May 3, 2013, regarding the committee's 2012 July Quarterly, October Quarterly and Pre-General Report:

Please note that each of the reimbursement transactions for non-federal and administrative purposes that were initially paid for by the federal account of PCCC and such transfers and reimbursements are permissible under Emily's List v. FEC.

July Quarterly Report

- 1) Payments received from PCCC Recall Committee were reimbursements from a non-federal account of PCCC in connection with payroll expenses incurred by the federal account in connection with non-federal expenses.
- 2) Transfers from the non-federal account were to reimburse for administrative expenses incurred during the 3rd Quarter of 2012. The committee engaged paid for over \$534,000 in administrative expenses during the 2nd quarter of 2012 that were eligible for reimbursement from the non-federal account.
- 3) All payments for advertising on Schedule of the committees reports were not for express advocacy and were properly disclosed on Schedule B.

October Quarterly Report

- 1) Payments received from PCCC Recall Committee were reimbursements from a non-federal account of PCCC in connection with payroll expenses incurred by the federal account in connection with non-federal expenses.
- 2) Transfers from the non-federal account were to reimburse for administrative expenses incurred during the 3rd Quarter of 2012. The committee engaged paid for over \$484,000 in administrative expenses during the 3rd quarter of 2012 that were eligible for reimbursement from the non-federal account.
- 3) All payments for advertising on Schedule of the committees reports were not for express advocacy and were properly disclosed on Schedule B.

Pre-General Report

Reimbursements received from Committee to Elect Alan Grayson, Rob Zerban for Congress and Kuster for Congress reflect a payment by the committee's to PCCC to pay for phone bank activities on behalf of the committees.
