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October 30, 2012

Ms. Jill Sugarman
Senior Campaign Finance & Reviewing Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Dear Ms. Sugarman:

In response to your letter of September 25, 2012, please note that Rory Lancman was, in fact, on the General Election ballot on the Working Families Party line from the date he was nominated on June 26, 2012, through September 25, 2012, when he formally declined said nomination to accept the Working Families Party nomination of Justice of the Supreme Court for the State of New York in the General Election. Please also be advised that, since Rory Lancman had no opposition for the Working Families Party nomination for Congress, he knew in advance of the Primary Election that he would be a candidate for Congress on the General Election ballot.

After we received your letter, our campaign's representatives had several conversations with you about the issues raised. You advised us that, as long as Mr. Lancman was on the General Election ballot, he could continue raising money for the General Election. You further advised that these monies could be used to pay off General Election and Primary Election debts (as long as the money was not being raised solely for that purpose). You directed us to several Advisory Opinions, including AO 1994-31, AO 1989-22 and AO 1976-101.

If you have further questions, please let us know so that we may address them.

Sincerely,
Stephanie Goldstone, Treasurer
