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August 21, 2013

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Federal Election Commission  
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ID: C00448696

Reference: Amended June Monthly Report (5/1-5/31/12), received 9/20/12 and Amended July Monthly Report (6/1-6/30/12), received 9/20/12.

Dear Mr. Jones:

This letter is in response to the two requests for additional information for the reports referenced above, dated July 18, 2013. The Committee first notes that although these reports were amended in September of 2012, the information questioned in the letters did not change from the original reports filed in June and July 2012, more than a year prior to the date of these requests.

The letters note that the Committee may have failed to file 48 hour notices related to independent expenditures aggregating \$10,000 or more for any given election, cycle to date. The Committee first was made aware of this issue in a letter from the previous analyst, dated 6/25/12 and in reference to the 2011 December Monthly Report. The Committee responded to the initial letter and indicated that it was the Committee's understanding that once the independent expenditure was disclosed on a regularly scheduled monthly disclosure report or a previous 48 or 24-hour report, the \$10,000 aggregation was reset to zero no additional 48 hour notice was required.

The previous analyst contacted the Committee directly at the end of July 2012 and explained that once the independent expenditure aggregate per election reached \$10,000 or more, an additional 48-hour notice was required, even if items disclosed on this 48-hour notice were previously disclosed. The Committee indicated it would follow this interpretation of the regulations and was assured that no further letters would be sent from the Federal Election Commission for this issue for any occurrences prior to our conversation. Please note that both reports referenced in these letters were filed on or before July 20, 2012, prior to the conversation with the analyst.

The Committee filed several 48- and 24-hour notices throughout 2012 and made every effort to comply with all of the reporting regulations. The Committee believed it was fully complying with the regulations concerning disclosure of independent expenditures until it received a phone call from the previous analyst at the end of July 2012. The Committee has corrected this filing procedure moving forward.

Sincerely,

Lisa Lisker  
Treasurer