

A-G79 @B9CI G'H9LH'fl 97 : cfa ' - - Ł

NAME OF COMMITTEE (In Full)
RickPAC

FEC IDENTIFICATION NUMBER
C00566497

Mailing Address PO BOX 2735

City	State	ZIP Code
AUSTIN	TX	78768

This Miscellaneous Report is issued on behalf of RickPAC ("the Committee") in response to a Request for Additional Information ("RFAI") dated December 22, 2016. The RFAI identifies three issues related to Schedule B Disbursements reported as part of the Committee's Amended 2015 Mid-Year Report. The Committee's response to each of these items is included below:

Request #1 and Request #2: The RFAI requests that the Committee provide additional information in the form of memo entries identifying the original vendor(s), date(s), amount(s), and purpose(s), for all reimbursements to individuals for goods or services, including certain reimbursements for "travel and subsistence advances." This request cites 11 CFR 104.3(b)(3)(i), 11 CFR 104.9, and Advisory Opinions 1992-1 and 1996-20 as justification for such additional data.

The amended filing referenced in the RFAI was drafted and submitted in a good-faith effort to comply with all relevant statutory and regulatory obligations. It is the Committee's opinion that its present disclosure of reimbursements is proper and in full compliance with the clear language of the Federal Election Campaign Act and all relevant regulations (including 11 CFR 104.3(b)(3)(i) and 104.9), which do NOT address or require "sub-vendor" disclosure or "sub-itemization" of such disbursements. Congress spoke directly to the issue of political committee reporting in the Federal Election Campaign Act and the issue of sub-itemization is neither legislatively addressed or contemplated. Similarly, existing regulations provide no reasonable basis for compelled sub-itemization.

Despite the fact that sub-itemization is not compelled by statute or regulation, the Committee is in the process of reviewing its internal records to assess particular reimbursement payments and determine whether additional details need be provided under the present RFAI. Such additional details will be added as amendments to the 2015 mid-year disclosure report as necessary moving forward. Given the limited resources of the Committee at present and the fact that it is winding-down, additional time will be required to complete this assessment.

Request #3: The RFAI requests clarification of a Schedule B itemized disbursement. This description has been amended to include additional descriptive details.

Please do not hesitate to contact the Committee if there are any questions regarding the contents of the amended disclosure report.