

Law Office of
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May 19, 2016

Federal Election Commission
Attn: Jack Baisden
Campaign Finance Analyst
999 E Street, N.W.
Washington, D.C. 20463

Re: Courageous Conservatives PAC (the "Committee")

Dear Jack Baisden:

This letter is in response to your letter dated May 8, 2016 concerning the March Monthly Report of the Committee. Your letter asked four questions. This letter is in response to those questions.

You asked about an in-kind contribution being disclosed on Schedule A with no corresponding in-kind expense. In preparing the March Monthly Report, we had to delete the in-kind expense because this amount was already reported on Line 24 as an independent expenditure. If we did not delete this entry, the cash on hand would be off by the amount of this expenditure. The March Monthly Report has been amended to provide the following explanation:

The Committee's media consultant, Mountaintop Media, incurred certain expenses for robocalls that were not pre-approved by the Committee. These expenses were in the nature of independent expenditures so they were reported on an Independent Expenditure Report. Since these expenditures were not pre-approved, the media consultant agreed to treat these expenditures as an in-kind contribution. When preparing the Monthly FEC Report the expenditure side of this in-kind contribution was deleted from Line 21(b) because it was automatically being reported on Line 24 as an independent expenditure. This was necessary to avoid double reporting of the same expense and throwing off the ending cash on hand.

Your letter also asked for more detail on the loans to the Committee. All the loans to the committee are non-interest bearing demand loans. To address this issue, we amended the March Monthly Report to provide the following explanation:

All loans are non-interest bearing demand loans. Therefore, all the loans have no specific due date and the interest rate is zero.

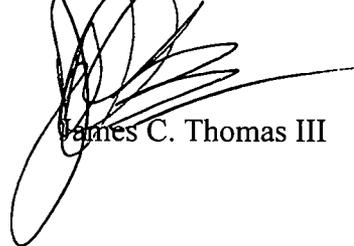
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The third question in your letter was regarding the detail on the independent expenditures. However, your letter asked no specific questions. We went through all of the independent expenditures. The only missing detail we found was that one independent expenditure did not have a category code. The March Monthly Report has been amended to add this category code.

The fourth question in your letter was regarding eight specific independent expenditures that you say were reported on Independent Expenditure Reports, but that were not itemized on the March Monthly Report. We have double checked this information. These Independent Expenditures were reported on an Independent Expenditure Report (FEC1048943), which was later amended (FEC1055747). These same independent expenditures are itemized on the March Monthly Report on pages 31 through 35. However, we think the problem is that despite the fact that we sought to amend FEC1048943 on March 17, this report actually shows up as a "new" report in your system. We had this same problem with a couple of reports that we attempted to amend about that time. However, the FEC software must be show these otherwise as amendments to the original independent expenditure or otherwise the ending cash on hand on the report would not reconcile to our books.

If further clarification or any additional information are needed to resolve this issue, please let us know.

Sincerely,



James C. Thomas III

JCT3/tlr

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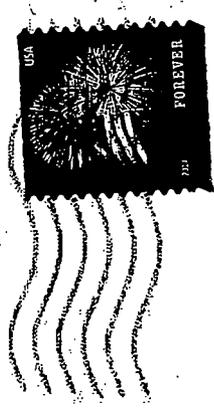
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