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Reference: October Monthly Report (09/01/2015-09/30/2015)

This statement is in response to the Commissions letter dated November 22, 2015. The Commission requested additional information regarding two items.

Item 1: 1. Schedule H3 of your reports discloses transfers-in from non-federal accounts for "4093.20 Rising Stars LP 7.11.15" and "8451 Annual Dinner 6.30.2015" which appear to exceed the permissible amounts indicated by your allocation ratio for these events. Please be advised that transfers for allocated activity must not exceed the non-federal share of the joint disbursements and that these transfers must be made within a 70-day time period: no more than 10 days before or 60 days after payment to the vendor. Please clarify the nature of these transfers-in from these non-federal accounts. (11 CFR 106.6(e)(2) and 106.7(f)(2))

Response: In accordance with the guidelines, the Committee calculates the ratio for all fundraising events based on the contributions received to date. When a payment is scheduled to be made on a fundraising event the ratio is updated to determine the current ratio. Once the event is completed a review of all expenses and transfers is completed in order to finalize the federal and non-federal share of the event. The Schedule H3 transfers-in from the non-federal accounts for 4093.20 Rising Stars LP 7.11.15 and 8451 Annual Dinner 6.30.15 are the correct amounts for the non-federal portion of the associated joint disbursements. Due to a software deficiency issue, schedule H3 and the calculation for H4 disbursements were not calculating correctly causing the H4 non-federal portion to be less than the H3 transfer-in. To correct the discrepancies on H4, the final allocation ratio was used and all impacted reports, June monthly, July monthly, August monthly and September monthly have been amended. The software deficiency does not allow a change to the percentage during a reporting period. This deficiency has been reported to the software company.

Item 2: Schedule H4 supporting Line 21(a) of your report discloses payments for "001 Communications Consultant" and "001 Printing NYS Seal Scarfs, Ties." Please be advised that pursuant to 11 CFR 300.33(c)(1), expenditures for public communications (as defined by 11 CFR 100.26) that refer to a clearly identified candidate for Federal office and that promote, support, attack or oppose any such candidate for Federal office must not be allocated between or among federal and non-federal accounts. Only federal funds may be used. Further, expenditures and disbursements for public communications that refer to a clearly identified candidate for Federal office and that promote, support, attack or oppose any candidate for Federal office, meet the definition of Federal Election Activity under 11 CFR 100.24 and should be disclosed on Schedule B for Line 30(b) along with the identity of the candidate(s). However, public communications that meet the definition of Federal Election Activity and that also contain express advocacy as defined under 11 CFR 100.22, but do not meet the conditions of exempt activity, would constitute an in-kind contribution, an independent expenditure or a coordinated party expenditure and should be properly disclosed on a Schedule B, E or F supporting Lines 23, 24 or 25, as appropriate, rather than on Schedule B for Line 30(b). Please amend your report to properly disclose this activity or provide clarifying information.

Response: The Schedule H4 payments for 001 Communications Consultant and 001 Printing NYS Seal Scarfs, Ties on the October monthly report are for the party only and are non-candidate related. The Communication Consultant handles the Committees media relations and the printing expense is for Committee lapel pins and scarfs. These expenditures were not for public communication for any identified candidate

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for Federal office. All future payments for these types of expenditures will be clearly identified as non-candidate expenses.
