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December 10, 2012

Ms. Carolyn Cavano  
Campaign Finance Analyst  
Reports Analysis Division  
Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

Dear Ms. Cavano,

I am writing in response to your November 5, 2012, letter regarding one or more contributions that appear to exceed the limits for individuals on the Cantor for Congress Amended July Quarterly Report (05/24/2012 - 06/30/2012), received 09/04/2012.

The attachment to your letter indicates that seven contributions from five individuals may have been excessive. Your letter recognizes that Cantor for Congress took corrective action with regard to many of these contributions, but suggests that some may not have been corrected. As explained in more detail below, Cantor for Congress refunded all apparently excessive contributions. Copies of the refund checks have been sent to you by first-class mail along with a hard copy of this correspondence. Cantor for Congress effected the refunds as soon as it discovered they may be necessary, and disclosed all refunds on the appropriate quarterly reports.

All seven of the apparently excessive contributions identified in your letter were received as part of a transfer of joint fundraising proceeds from a joint fundraising committee called the Cantor Victory Fund. Prior to making the transfer, the Cantor Victory Fund deducted the appropriate portion of administrative expenses it incurred on behalf of Cantor for Congress. 11 CFR 102.17(c)(7). This resulted in a transfer of a net amount that was less than the total amount of the underlying contributions that made up the transfer. Nonetheless, Cantor for Congress disclosed and itemized as memo entries the full amount of each contribution that made up the transfer. 11 CFR 102.17(c)(8)(i)(B). A summary of the itemized memo entries of the contributions identified in your letter follows:

Page 109 Mr. Richard Wright, \$2,500, 2012 General;

Page 111 Mr. Thomas F. Gilman, \$2,500, 2012 Primary;

Page 111 Mr. Thomas F. Gilman, \$2,500, 2012 General;

Page 111 Ms. Ellen Sandler, \$2,500, 2012 General;

Page 112 D.J. Jimmy Rogers, \$2,500, 2012 Primary;

Page 114 Mr. Sheldon Yellen, \$2,500, 2012 Primary; and

Page 115 Mr. Sheldon Yellen, \$2,500, 2012 General.

When Cantor for Congress discovered these apparently excessive contributions, it refunded the appropriate net amounts back to the Cantor Victory Fund and included corresponding memo entries identifying the full amount of each underlying

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contribution that was refunded.

The first refund to the Cantor Victory Fund was on May 31, 2012, for \$5,595 and was disclosed on page 224. Page 223 includes the memo entries for the refunds of the underlying contributions from:

Ms. Ellen Sandler, \$2,500, 2012 General; and

Mr. Richard Wright, \$2,500, 2012 General.

Please note that these memo entries and the refund to the Cantor Victory Fund mistakenly state that the refunds were for 2012 Primary contributions when, in fact, they were for the 2012 General contributions noted in your letter. This administrative error may also be the reason why your letter suggests that not all of the apparently excessive contributions were corrected. Cantor for Congress has amended the report to indicate that the refunds were for 2012 General contributions.

The second refund to the Cantor Victory Fund was on July 11, 2012, for \$5,595 and was disclosed on page 328 of the October Quarterly Report. Page 326 of the October Quarterly Report includes the memo entries for the refunds of the underlying contributions from:

Mr. Thomas F. Gilman, \$2,500, 2012 Primary;

Mr. Thomas F. Gilman, \$2,500, 2012 General; and

D.J. Jimmy Rogers, \$2,500, 2012 Primary.

The third refund to the Cantor Victory Fund was on September 26, 2012, for \$3,750 and was disclosed on page 328 of the October Quarterly Report. Page 327 of the October Quarterly Report includes the memo entries for the refunds of the underlying contributions from:

Mr. Sheldon Yellen, \$2,500, 2012 Primary; and

Mr. Sheldon Yellen, \$2,500, 2012 General.

Accordingly, and as you will see from the corresponding refund checks that have been sent to you, all apparently excessive contributions identified in your letter were refunded to the Cantor Victory Fund by Cantor for Congress.

I trust this adequately responds to your letter.

Sincerely,

Cindy Wharton - Finance Director

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