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Federal Election Commission  
999 E Street, NW  
Washington, D.C. 20463

September 11, 2012

James McAllister  
Senior Campaign Finance Analyst  
Reports Analysis Division

RE: Request for Additional Information-August 7, 2012

Dear Mr. McAllister,

This responds to the Reports Analysis Division's ("RAD") Request for Additional Information ("RFAI") dated August 7, 2012, requesting that WOF amend its 2012 February and March monthly reports or explain why additional activity was not included in its original reports. The RFAI indicates that RAD's inquiry was prompted by WOF's amended February and March monthly reports, which were received on May 30, 2012, and June 29, 2012, respectively.

First, to correct the record, all of the expenditures cited in this RFAI were disclosed in amended February and March 2012 monthly reports, which were filed on March 20 and April 5, respectively - not on the May 30 and June 29 reports which concerned unrelated and minor matters.

Second, as RAD is fully aware, the bulk of the information reported on the February and March amended monthly reports corresponds to information disclosed by WOF on amended 24- and 48-hour reports -- all of which were self-initiated and filed promptly upon discovery of additional or clarifying information. The only item on either of the two monthly reports that does not correspond to an amended 24- or 48-hour report was prompted by an error by vendor Marketel Media, which notified WOF after the February monthly filing deadline that its invoice for a late-January expenditure under-charged WOF \$36,650.10. WOF paid the vendor the additional amount and noted this change in its March amendment to the February monthly report.

To place this matter in context, WOF has to date filed reports itemizing over \$23 million in expenditures, including eighty-seven 24- and 48-hour reports. A number of the amended 24- and 48-hour reports, it should be noted, were filed in response to RAD's insistence that WOF evenly apportion the cost of national ad buys among every state with a primary or caucus scheduled after the date of the expenditure - a view at odds with the understanding of this Committee and more than a dozen other independent-expenditure committees filing at the same time, and a position that added nothing to public understanding of the committee's spending.

Nonetheless, WOF has met its obligations to submit information in a timely fashion. All regular reporting deadlines were met and amendments were filed upon discovery of previously unavailable information. At all times, it WOF has taken appropriate precautions, such as explaining to vendors the relevant deadlines and information required for 24- and 48-hour reporting, following up with vendors to obtain and confirm information, double-checking its own records, and reconciling committee records with bank statements. When information has been obtained that has necessitated an amendment of a prior report, WOF has taken all reasonable steps to expeditiously file such amendments. The record of this committee's receipts and expenditures is complete and reflects ample diligence and attention to reporting requirements. See Commission's Statement of Policy Regarding Treasurers' Best Efforts from 2007 (Notice 2007-13, 72 FR 31438).

Respectfully submitted,

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Brent Mudd  
Treasurer, Winning Our Future

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