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NAME OF COMMITTEE (In Full)  
Immigrant Voters Win PAC

FEC IDENTIFICATION NUMBER  
C00612820

Mailing Address 1536 U Street NW

City State ZIP Code  
Washington DC 20009

June 14, 2017

Samantha Hay  
Campaign Finance Analyst  
Reports Analysis Division  
Federal Election Commission  
999 E Street, NW  
Washington, DC 20463  
VIA ELECTRONIC FILING

IDENTIFICATION NUMBER: C00612820

REFERENCE: OCTOBER QUARTERLY REPORT (07/01/2016 - 09/30/2016)

Dear Ms. Hay:

I am writing as counsel to Immigrant Voters Win PAC (IVWP) in response to the Commission's May 10, 2017, request for additional information related to items disclosed on the above-referenced October Quarterly Report.

Item 1

You identified several disbursements for which you suggest the purposes listed on the quarterly report may have been inadequate. I explain each below in more detail than possible in the limited space provided on the reporting form:

"Event Reporting" (pages 118, 168, 240, and 243 of the report): These were compensation paid to a writing fellow hired by Immigrant Voters Win PAC to write content about Immigrant Voters Win PAC's activities for social media, websites, press releases, and similar communications.

"Program Management and Administrative Services" (pages 130, 154, 243, and 270) and "Administrative Support Services" (pages 137, 152, 174, 211, 215, 244, 249, 286, 287): These were payments to staff tasked with tracking and reporting the costs associated with staff and other resources that Immigrant Voters Win PAC shared with other organizations. The work was necessary to ensure that Immigrant Voters Win PAC paid and reported the full costs attributable to Immigrant Voters Win PAC's use of these shared resources.

"Promotional Services" (page 226): This was a payment to a public relations firm for the production of a series of nonpartisan video and audio messages featuring a popular musical act urging eligible Latinos to register and vote in the upcoming election. No candidates for any office were identified or referenced in any of these messages.

"Bird Dogger" (page 255, 321, 330): "Bird-dogging" is a term used to refer to the practice of sending people to events held by opposing candidates, either to challenge the candidate with difficult questions or to record the event with an eye toward holding the candidate accountable for the candidate's statements or behavior at the event. These disbursements payments to one such bird-dogger who, on behalf of the committee, attended events for federal and non-federal candidates in September.

As we discussed on the telephone, I am providing these more complete descriptions here as a more transparent way of describing the purpose of these disbursements rather than amending the previously filed report.

Item 2

You asked about a number of disbursements labeled "Travel Per Diem." Under pre-determined policy, committee staff on

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out-of-town travel were provided with a per diem of up to \$45 per day (\$55 in certain high-cost cities) for meals and incidentals (e.g., tips) in lieu of item-by-item reimbursement. Per diems were reduced when meals were provided to staff. Reported disbursement amounts in excess of the daily per diem represent per diems for multiple days.

Item 3

You asked about payments to Community Outreach Group - COG - made on September 13 for canvassing and organizing services advocating the election of a number of federal candidates that were reported on a September 19 48-Hour Report. The payment to this vendor was for paid door-to-door canvassing in support of the candidates that continued through the end of September (i.e. much of it after September 19). It proved difficult to get an allocation of the September 13 payment among the six different federal candidates supported, resulting in the report being filed on September 19. This difficulty resulted in the committee clarifying with the vendor the allocation process for future payments in order to make timely, accurate reporting feasible despite the inherent challenges of getting correct allocations for a large, fluid canvass operation.

If you have any further questions regarding this matter, please feel free to contact me at 202-328-3500.

Very truly yours,  
John Pomeranz  
Counsel to Immigrant Voters Win PAC