

September 2, 2011

Maureen Benitz
Senior Campaign Finance Analyst
Federal Election Commission
999 E St., NW
Washington, DC 20463

Identification Number: C00315747

Reference: July Monthly Report (6/1/11-6/30/11)

Dear Ms. Benitz:

This letter is in response to your request for additional information dated August 5, 2011.

Your letter indicates that Schedule B of line 21(b) discloses negative entries related to refunds or rebates of expenditures made in a previous period. These negative entries are credits given by vendors to the Committee credit card for ultimate vendor memo entries previously disclosed as being paid thru the credit card.

The current payment made to the credit card is then net of that credit. The only way to properly disclose the actual amount paid to the credit card and to disclose the ultimate vendor entries (as required) and their amounts so that they add up to that amount paid is to disclose the credits issued thru the Committee credit card. These are not refunds made to and deposited by the Committee-they are credits made to the credit card. The ultimate vendor itemization requirement is met by including these memo entries as part of the payment to the credit card. Reporting these as a vendor refund or rebate check that is deposited by the Committee would be inaccurate.

Sincerely,

Lisa Lisker
Treasurer

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Treasurer
