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NAME OF COMMITTEE (In Full)  
PHILLIPS 66 PAC

FEC IDENTIFICATION NUMBER  
C00513549

Mailing Address 601 PENNSYLVANIA AVENUE, NW  
STE 1150N

City State ZIP Code  
WASHINGTON DC 20004

June 7, 2019

Brian Jones  
Sr. Campaign Finance & Reviewing Analyst  
Reports Analysis Division  
Federal Election Commission  
Washington, DC 20463

Re: Phillips 66 PAC, C00513549, Amended Year-End 2018 Report (11/27/2018 ? 12/31/2018)

Dear Mr. Jones,

This letter is in response to your Request for Additional Information ?RFAI? dated 5/23/2019.

Upon filing the committee?s original Year-End 2018 report we realized that an incorrect version of the report in our campaign finance software was inadvertently selected by our outsourcing company. The report filed only covered reporting period 12/1/2018 to 12/31/2018. As the Year End report period should cover 11/27/2018 to 12/31/2018, we decided to amend the report. When the reporting period was expanded, it included additional contributions from our 11/30/2018 payroll thereby increasing the committee?s cash on hand by \$13,402.02.

With regard to the ?unacceptable? occupation descriptions, it appears that the interface between our internal payroll system and our campaign finance software was inadvertently changed by our Information Technology department in late 2018. The interface began referencing a different column in the database for employee occupation which was less descriptive. Our intention has always been to fully comply with the FEC?s disclosure requirements and as such, this change to the occupation information of our contributors was wholly inadvertent on our part and will be corrected manually moving forward. Per your request on page 2 of your letter, we have filed an amendment to the Year End 2018 report properly disclosing all itemized contributor occupations.

Please feel free to contact me if you have further questions.

Sincerely,

James Orcutt, Treasurer  
Phillips 66 PAC