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March 14, 2013  
Mr. Paul Stoetzer  
Senior Campaign Finance Analyst  
Reports Analysis Division  
Federal Elections Commission  
Washington, DC 20463

Re: Spirit AeroSystems, Inc. PAC, No. C00428110

Dear Mr. Stoetzer:

This responds to your February 15, 2013 Request for Additional Information (?RFAI?) concerning the amended 2012 third quarter report filed by Spirit AeroSystems, Inc. PAC (?Spirit PAC?). The RFAI sought clarification regarding \$24,500.00 in disbursements disclosed by the amended report that were not disclosed by Spirit PAC?s original 2012 third quarter report.

Spirit PAC filed an amended 2012 third quarter report on October 31, 2012 in order to properly disclose several contributions it made during the reporting period that were mistakenly omitted from the original report filed on October 11. Rather than disclosing all 2012 third quarter disbursements in its original report, Spirit PAC only listed disbursements by check that actually had cleared during the third quarter. Upon discovering this mistake during a review of its records, Spirit PAC quickly filed its amended report in order to properly identify all 2012 third quarter disbursements.

Please note that Sprit PAC encountered a similar issue with regard to its 2012 pre-general election report. Spirit PAC?s original 2012 pre-general election report, filed October 24, 2012, mistakenly disclosed \$7,500.00 in disbursements. These disbursements actually were made by check in the 2012 third quarter, but the checks cleared during the pre-general election filing period. Upon discovering this mistake, Spirit PAC filed an amended pre-general election report on October 31, 2012 that correctly shows zero disbursements. The \$7,500.00 in disbursements identified by Spirit PAC?s October 24, 2012 pre-general election report are included in Spirit PAC?s amended 2012 third quarter report filed on October 31, 2012.

I trust that this explanation provides the clarification sought by the RFAI. Please contact me if you have any additional questions regarding this matter.

Sincerely,

Mike L. Williams  
Treasurer, Spirit AeroSystems, Inc. PAC

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