A=G79@@5B9CI GH9LH"fl 97 : cfa -- Ł

PAGE 1 / 2

NAME OF COMMITTEE (In Full) CLUB FOR CONSERVATIVES

FEC IDENTIFICATION NUMBER C00658302

Mailing Address 3540 CLEMMONS RD

SUITE 121

City CLEMMONS State ZIP Code NC 27012

COMMITTEE?S RESPONSE TO RFAI DATED 6 JUNE 2018

(ENUMERATED PARAGRAPHS BELOW CORRESPOND TO THE ENUMERATED PARAGRAPHS CONTAINED IN THE RFAI.)

- (1) Nathanael Pendley is authorized to assist the Treasurer in the filing of reports, dealing with the Commission, and disclosing committee information required by law. This grant of authority is memorialized in the Committee?s most recent Statement of Organization.
- (2) The Committee believes that all requested donor Employer and Occupational information is now contained in its Amended Report or the period in question.

In the event any donor?s employment status and related information are not supplied voluntarily by the donor, please be aware that the Committee has a firm policy of employing Best Efforts practices to collect that requested information. In particular, we include a clear and conspicuous request for the required employer and occupation information on all solicitations, as well as the fact that federal law requires us to request that information.

On occasions when incomplete or confusing information is supplied, we make at least one (and typically more) follow up, stand alone effort to obtain the information for all sufficiently-sized contributions irrespective of source. We clearly request the relevant information, but do not seek additional contributions during that communication. We also reiterate that federal law requires us to seek that information.

The Committee further employs a policy of amending previous filings on or before the date of our next regular report to include occupational and employer information of relevant donors whenever that information comes into our possession after the filing of the report that originally disclosed the donation.

Again, we presently contend that all occupation and employer information requested now appears on the Amended Report for

the subject reporting period.

(3) The Committee was mindful of the obligation to file Independent Expenditure reports for the two separate IE?s referenced and duly recorded in the Annual Report, and did in fact attempt to do so on a timely basis. In fact, we received the appearance of a confirmation that the reports had actually been received by the Commission, notwithstanding numerous incidental difficulties with the transmission that were the subject of several calls by the Committee to the Commission in our efforts to accomplish the filing.

That having been said, the filing was executed/attempted through an Apple MacBook computer product, which it now appears

is fundamentally unable to cooperate with the Commission?s electronic framework. Accordingly, the Committee has purchased and now uses a Windows PC for its FEC filings, and expects no further issues with any required 24-hour IE reports. The two subject IEs were in fact reported and duly disclosed on the Committee?s next regular report, and as such are a matter of public record.

(4) An electronic bug or glitch of some sort in the Committee?s FECfile prevented the subject \$13,000.00 debt/IE from being marked as a ?MEMO? item in FECfile, which deflated the Cash On Hand line item by a corresponding amount. In short, the software disabled the option of checking the MEMO box.

Commission technicians requested and were sent the Committee?s file for review, and subsequently recommended the complete deletion of the debt entry, followed by an immediate re-entry of the subject IE/debt as a fresh entry. This did in fact clear up the glitch. We were able to make a notation in the MEMO field of the Line 24 IE entry, and the Cash On Hand level self-adjusted accordingly (as well as with subsequent reports). The Committee?s Amended Report for the subject reporting period includes the adjustment.

The Committee appreciates the work of the Commission Analysts in calling these issues to our attention, and regrets that its filings left questions to be resolved, notwithstanding

Image# 201807119115365541

A=G79@@5B9CIGH9LH"fl97": cfa -- Ł

PAGE 2 / 2

07/11/2018 22:18

NAME OF COMMITTEE (In Full)
CLUB FOR CONSERVATIVES

FEC IDENTIFICATION NUMBER C00658302

Mailing Address 3540 CLEMMONS RD

SUITE 121

City CLEMMONS State ZIP Code NC 27012

our vigorous efforts to supply all required filings, reports,

and disclosures. To the best of our knowledge, we have resolved all of the matters on which additional information was requested, but we certainly stand ready to provide any additional information that may be necessary or requested if questions persist, or if any further questions arise.