

MISCELLANEOUS TEXT (FEC Form 99)

PAGE 1 / 2

April 21, 2015

Ms. Maureen Benitz
Senior Campaign Finance & Reviewing Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, D.C. 20463

Re: Special Operations for America ("SOFA"): Identification#: C00523241

REFERENCE: YEAR-END REPORT (07/01/2013 - 12/31/2013)

Dear Ms. Benitz,

Thank you for the opportunity to respond to the Commission's letter dated March 17, 2015. The Commission requested additional information regarding two items.

1. The Commission requested additional information regarding the employers and occupations of several donors. This correspondence is to further articulate that SOFA has actively tried to acquire and report each contributor's name, address, and employer/occupation information.

SOFA meets the guidelines of 11 CFR 104.7. Specifically, SOFA undertakes the following actions:

I. SOFA's original solicitation includes a clear and conspicuous request for the contributor information and informs the contributor of the requirements of federal law for the reporting of such information.

II. When such information was not provided, SOFA made at least one follow-up, stand-alone effort to obtain said information.

III. The follow-up effort occurred before 30-days after receipt of the contribution and was in the form of a request via mail, e-mail, or telephone call documented in writing. Said requests included the following:

a. An inquiry for the missing information, without soliciting a contribution.

b. Notification to the contributor that the requirements of federal law for the reporting of contributor information.

c. Also, SOFA includes a pre-addressed return envelope.

IV. When SOFA receives contributor information after the contribution(s) has been reported, SOFA files an amendment to the original report disclosing the information.

MISCELLANEOUS TEXT (FEC Form 99)

PAGE 2 / 2

2. The Commission requested additional information regarding Schedule E where the Committee may have failed to timely file one or more of the required 48-hour report(s) for independent expenditures. The Committee acknowledged this in a Form 99 (FEC-905630) to the Commission. The Committee filed the 48-hour notice on 1/31/2014 as a result of a miscommunication unearthed during the year-end audit. The Committee now has in place appropriate protocols for timely reports going forward. Additionally, the Commission requested additional information regarding payments for Direct Mail Printing & Postage and Online Advertising appearing on Schedule B supporting Line 21(b). These payments were not for a public communication that referred to a clearly identified candidate for Federal office. Clarification of the purpose will be provided in an Amended report.

This should answer the Commission's inquiry. Please feel free to contact us if you have any further questions.

Sincerely

Kaarlo Hietala
Treasurer
