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April 16, 2015

Brian Jones  
Senior Campaign Finance & Reviewing Analyst  
Federal Election Commission  
999 E St., NW  
Washington, DC 20463

ID: C00034470

Reference: Year End Report 11/25/14-12/31/14

Dear Mr. Jones:

This letter is in response to your request for additional information dated March 12, 2015.

1. Your letter indicates that the Committee disclosed contributions made after the 2014 General Election, but designated for the 2014 General Election, with no reference to General Election Debt. As was noted on the filing, Diageo made a series of in kind contributions to these committees prior to 11/4/14. The recipient committees were notified of these in kind contributions at that time. However, the Diageo PAC did not receive billing for and pay for the in kinds until after the date of the General Election.
2. Your letter indicates that payments to the connected organization for facilitation of fundraising activities for federal candidates must be made in advance of the services. However, the PAC did not receive billing for the last events of the cycle until after they were held. The PAC paid these bills upon receipt. All costs were at fair market value. The Committee will make every effort to pay all future costs such as these in advance of the services being rendered, or within commercially reasonable time if actual costs cannot be determined until the date of the event.

Sincerely,  
Michael Mulhall  
Treasurer

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