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NAME OF COMMITTEE (In Full)
For Our Future

FEC IDENTIFICATION NUMBER
C00620971

Mailing Address 1411 K Street NW, Suite 900

City State ZIP Code
Washington DC 20005

We are responding to your letter dated April 7, 2019.

RFAI Regarding Pre-General Report Filed on October 25th, 2018 and amended on December 21, 2018

?Late 48 Hour Report (Schedule E)?

AFSCME Special Account Voter Outreach Calls

During October 2018, AFSCME Special Account provided an in-kind contribution to the Committee in the form of phone calls to voters that expressly advocated the reelection of Senator Bill Nelson (D-FL). However, due to an inadvertent miscommunication between the Committee and AFSCME Special Account, the Committee?s legal and compliance team was unable to determine with certainty the content of the call scripts, the exact dissemination dates of the calls, and the costs of the phone bank in order to file timely 48-Hour Reports. The Committee then did so promptly, filing 48-Hour Reports on October 16th and 17th to disclose all of these independent expenditures. Given the different dissemination dates and triggering monetary thresholds involved, it is useful to divide up these independent expenditures into sub-categories: calls that were due to be reported respectively on October 13th, 14th, and 15th.

?Calls Disseminated Oct. 8th ? 12th, 2018 and Reports Due on Oct. 13th and 14th

The Committee originally reported these calls on a 48-Hour Report filed on October 16th, 2018, which contained an entry \$2,815.80 with a dissemination date of October 8th. See Exhibit 1. However, none of these calls were reported 6 days late. In fact, October 8th was the earliest of a series of dates when calls were made, and in preparing its Pre-General Report the Committee determined the costs of the calls per day in order to more accurately disclose their actual dissemination dates. On October 25th the Committee timely filed that report, which disclosed five entries on Schedule E described as ?In-Kinded Voter Outreach Calls? with payee AFSCME Special Account, disseminated daily for five days from October 8th to 12th, in the daily amount of \$563.16. See Items marked ?A? and ?B? in Exhibit 3. These five entries match the lump sum amount of \$2,815.80 reported on the October 16th 48-Hour Report.

In light of other independent expenditures during this time period in the same Senate election with other vendors?Image Plus Graphics on October 11th and Deliver Strategies on October 12th?October 11 was the date when the Committee?s obligation to file a 48-Hour Report was triggered for the October 8th-11th AFSCME Special Account in-kind expenditures, cumulatively worth \$2,252.64. See Exhibit 4 (showing that the aggregate threshold of \$10,000 was reached on October 11th due to the Image Plus expenditure). Therefore, these calls were reported 3 days late, not 6 days late. And, the \$563.16 independent expenditure on October 12th was due to be reported on October 14th, because the aggregate threshold for independent expenditures in the race was reached on October 12th; so, the corresponding 48-Hour Report was filed 2 days late on October 16th.

?Calls Disseminated Oct. 13th ? Oct. 16th, 2018 and Report Due on October 15th

Due to a further inadvertent miscommunication between the Committee and AFSCME Special Account, the portion of the in-kind independent expenditures that were made from October 13th to October 16th were not fully disclosed until the Committee?s October 17th 48-Hour Report. The Committee determined that the daily cost of these calls was \$663.33, totaling \$2,653.32 during that time period. See Items marked ?C?, ?D?, ?E?, and ?F? in Exhibit 2. The Committee has determined that the \$663.33 expenditure disseminated on Oct. 13th identified by the FEC in its RFAI was due to be reported on Oct. 15th because the \$10,000 threshold was met on October 13th, when aggregated with other expenditures in the same race on October 13th. See Exhibit 4. So, this expenditure was reported 2 days late.

Deliver Strategies Mail Pieces

During the weeks preceding the October

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25th Pre-General Report deadline, the Committee's compliance staff was tracking more than 30 paid public communications of 10 different types (digital ads, phone calls, SMS texts, canvassing literature, direct mail, canvassing services, stickers, T-shirts, etc.) totaling at least \$678,000 worth of federal and non-federal candidate activity in Florida alone delivered by at least 8 vendors. Invoices for the many public communications produced by the Committee's vendors during this period were often required by their content to be divided, allocated to and funded by different Committee-affiliated nonfederal political committees for state reporting. For instance, the same invoice for public communications in Florida pertained to both the Committee's independent expenditures in the U.S. Senate election and Florida-registered committee advocacy in the gubernatorial election, as well as local ballot initiatives.

Of these communications, Committee vendor Deliver Strategies printed and delivered six Spanish and English language mail pieces, some of which contained express advocacy for or against federal candidates and some which lacked federally reportable content. All of these pieces targeted Florida voters, were in a similar cost range (\$141,000-\$157,000), were disseminated around the same times, contained similar images, color schemes, layouts and sizes, and related to health care issues.

One such mail piece that was determined to qualify as an independent expenditure? a \$146,095.37 mail piece expressly advocating against the election of Rick Scott and scheduled for an October 15th dissemination date? was inadvertently omitted from the spreadsheet of reportable expenditures transmitted to the Committee's reporting compliance vendor. The Committee discovered this oversight and immediately, on October 25th, filed a 48-Hour Report as well as timely disclosing the expenditure on Schedule E of its Pre-General Report. Following a thorough review, the Committee has determined that its error was mainly due to the circumstances that, as noted earlier, the compliance staff was simultaneously tracking a high volume of contemporaneous activity in the form of multiple modes of communication, types of content, costs, vendors, and funding sources, and six mail pieces produced by the same vendor were closely similar to each other.

Finally, the Committee notes that all of the mail pieces that are the subject of the RFAI were accurately and fully publicly reported weeks before the election, immediately upon the Committee's own self-initiated determination that they should have been reported several days previously, and the Committee otherwise contemporaneously and timely reported many other independent expenditures with respect to the same Florida Senate election, so the brief reporting shortfalls did not withhold from the public the fact that the Committee was substantially involved in that election.

EXHIBIT 1

48-Hour Report Filed on 10/16/2018

Name of Payee, Dissem. Date, Amount, Candidate; Report Date  
A&B, AFSCME Special Account, 10/8/18, \$2815.80, Nelson, Bill; 10/16/18

EXHIBIT 2

48-Hour Report Filed on 10/17/2018

Name of Payee, Dissem. Date, Amount, Candidate; Election, Report Date  
C. AFSCME Special Account, 10/13/18, \$663.33, Nelson, Bill; G2018 10/17/18  
D. AFSCME Special Account, 10/14/18, \$663.33, Nelson, Bill; G2018 10/17/18  
E. AFSCME Special Account, 10/15/18, \$663.33, Nelson, Bill; G2018 10/17/18  
F. AFSCME Special Account, 10/16/18, \$663.33, Nelson, Bill; G2018 10/17/18

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EXHIBIT 3

Pre-General Report Originally filed on 10/25/2018 (amended on 12/21/2018)

- Name of Payee, Dissem. Date, Amount, Candidate; Election
A. AFSCME Special Account, 10/8/18, \$563.16, Nelson, Bill; G2018
A. AFSCME Special Account, 10/9/18, \$563.16, Nelson Bill; G2018
A. AFSCME Special Account, 10/10/18, \$563.16, Nelson, Bill; G2018
A. AFSCME Special Account, 10/11/18, \$563.16, Nelson, Bill; G2018
B. AFSCME Special Account, 10/12/18, \$563.16, Nelson, Bill; G2018
C. AFSCME Special Account, 10/13/18, \$663.33, Nelson, Bill; G2018
D. AFSCME Special Account, 10/14/18, \$663.33, Nelson, Bill; G2018
E. AFSCME Special Account, 10/15/18, \$663.33, Nelson, Bill; G2018
F. AFSCME Special Account, 10/16/18, \$663.33, Nelson, Bill; G2018

EXHIBIT 4

Independent Expenditures Threshold in FL-SEN Election

Payee; Dissem. Date; Amount; Candidate; Cumulative Aggregate Total; Date Reported; Date Report Due; Notes

For Our Future Action Fund; 10/1/18; \$21,458.25 (estimate); Nelson; \$21,458.25; 10/3/18; 10/3/18; Timely
For Our Future Action Fund; 10/1/18; \$21,458.25 (estimate); Scott; \$42,916.50; 10/3/18; 10/3/18; Timely
Image Plus Graphics; 10/2/18; \$2,306.37; Nelson; \$45,222.87; 10/3/18; 10/3/18; 1 Day Early
Image Plus Graphics; 10/2/18; \$2,306.38; Scott; \$47,529.25; 10/3/18; 10/3/18; 1 Day Early
Mission Control; 10/2/18; \$375; Nelson; \$47,904.25; 10/3/18; 10/3/18; 1 Day Early
Mission Control; 10/2/18; \$375; Scott; \$48,279.25; 10/3/18; 10/3/18; 1 Day Early
[\$10,000 reporting threshold met for 10/3/18 Report]

A. AFSCME; 10/8/18; \$563.16; Nelson; \$563.16; 10/16/18; 10/13/18; 3 days late
A. AFSCME; 10/9/18; \$563.16; Nelson; \$1,126.32; 10/16/18; 10/13/18; 3 days late
A. AFSCME; 10/10/18; \$563.16; Nelson; \$1,689.48; 10/16/18; 10/13/18; 3 days late
A. AFSCME; 10/11/18; \$563.16; Nelson; \$2,252.64; 10/16/18; 10/13/18; 3 days late
Image Plus Graphics; 10/11/18; \$563.21; Nelson; \$2,815.85; 10/13/18; 10/13/18; Timely Filed
Image Plus Graphics; 10/11/18; \$7,984.88; Nelson; \$10,800.73; 10/13/18; 10/13/18; Timely Filed
[\$10,000 reporting threshold met for Report]

Deliver Strategies; 10/12/18; \$145,539.56; Scott; \$145,539.56; 10/13/18; 10/14/18; 1 day early
B. AFSCME; 10/12/18; \$563.16; Nelson; \$146,102.72; 10/16/18; 10/14/18; 2 days late
[\$10,000 reporting threshold met for Report]

C. AFSCME; 10/13/18; \$663.33; Nelson; \$663.33; 10/17/18; 10/15/18; 2 days late
GRSG Company; 10/13/18; \$58,875.00; Scott; \$59,538.33; 10/13/18; 10/15/18; 2 days early
Facebook; 10/13/18; \$333.33; Nelson; \$59,871.66; 10/13/18; 10/15/18; 2 days early
GRSG Company; 10/13/18; \$117,750.00; Nelson; \$177,621.66; 10/13/18; 10/15/18; 2 days early
[\$10,000 reporting threshold met for Report]

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AFSCME; 10/14/18; \$663.33; Nelson; \$663.33; 10/17/18; 10/17/18; Timely  
 AFSCME; 10/15/18; \$663.33; Nelson; \$1,326.66; 10/17/18; 10/17/18; Timely  
 Deliver Strategies; 10/15/18; \$146,095.37; Scott; \$147,422.03; 10/25/18; 10/17/18; 8 days late  
 Image Plus Graphics; 10/15/18; \$4,399.97; Nelson; \$151,822.00; 10/16/18; 10/17/18; 1 day early  
 Image Plus Graphics; 10/15/18; \$2,199.99; Scott; \$154,021.99; 10/16/18; 10/17/18; 1 day early  
 [\$10,000 reporting threshold met for Report]

AFSCME; 10/16/18; \$663.33; Nelson; \$663.33; 10/17/18; 10/18/18; 1 day early  
 Facebook; 10/16/18; \$37,500 (estimate); Nelson; \$38,163.33; 10/16/18; 10/18/18; 2 days early  
 For Our Future Action Fund; 10/16/18; \$5,503.84 (estimate); Nelson; \$43,667.17; 10/18/18; 10/18/18; Timely  
 For Our Future Action Fund; 10/16/18; \$5,503.84 (estimate); Scott; \$49,171.01; 10/18/18; 10/18/18; Timely  
 Hustle, Inc.; 10/16/18; \$20,000; Nelson; \$69,171.01; 10/16/18; 10/18/18; 2 days early  
 [\$10,000 reporting threshold met for Report]