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April 23, 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: JULY QUARTERLY REPORT (04/01/2014 - 06/30/2014)

Dear Ms. Benitz,

Thank you for the opportunity to respond to the Commission's letter dated March 19, 2015. The Commission requested additional information regarding three 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.

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 independent expenditure in question was originally filed on time in a 48-hour report on May 5, 2014 (FEC-923314). The original report was an estimate of the expenditure that was later adjusted which the committee updated in an amendment filed on May 19, 2014 (FEC-926334).

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3. The Commission requested additional information regarding Schedule E where the Committee may have failed to timely file one or more of the required 24-hour report(s) for independent expenditures. The independent expenditure in question was originally filed on time in a 48-hour report on May 5, 2014 (FEC-923314) as a public communication opposing a Federal candidate. The independent expenditure was later adjusted to allocate the amount spent towards a different candidate, which the committee updated in a new report filed on May 19, 2014 (FEC-926336). Additionally, the Commission requested additional information regarding payments for Direct Mail Printing & Postage, Media Production 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.

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

Sincerely

Kaarlo Hietala  
Treasurer

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