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REFERENCE: AMENDED YEAR-END REPORT (07/01/2011 - 12/31/2011), RECEIVED 05/16/2012. This is in response to RQ-2 dated October 23, 2012 and signed by Rosa Lewis. The specific issue: - "Schedule B supporting Line 22 discloses disbursements to a nonfederal account (see attached.) You are advised that 11 CFR ?102.5 prohibits a non-federal account from financing activity in connection with federal elections. Please provide clarifying information . . ."

The funds in question were a contribution from this PAC to a Virginia-registered state PAC, for use in state and local elections only. None of the funds in question were intended for, or used for, purposes of influencing any Federal election, and none of the funds in question were intended for, or used as, reimbursement of any administrative expenses.

I trust this addresses the question sufficiently.
