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May 21, 2014

Ms. Kaitlin Eger
Senior Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, DC 20463

IDENTIFICATION NUMBER: C00003111

REFERENCE: MARCH MONTHLY REPORT (02/01/2014-02/28/2014)

Dear Ms. Eger:

This statement is in response to the Commission's letter dated May 16, 2014. The Commission requested additional information on descriptions and nature of allocated expenses.

The allocated expenses in the above referenced report, as well as the subsequently filed reports, described as "PAYROLL," "PAYROLL BENEFITS," and "PAYROLL SERVICES/TAXES" are for employees who have dedicated far less than 25% of their time on FEA or any Federal Election. Therefore, expenses associated with these employees - payroll, benefits, and taxes - are still allocable Federal and non-Federal Expenses.

The allocated expenses in the above referenced report, as well as the subsequently filed reports, described as "FIELD CONSULTING," and "STRATEGY CONSULTING" are for independent contractors and consultants who have dedicated far less than 25% of their time on FEA or any Federal Election. Therefore, expenses associated with these contractors are still allocable Federal and non-Federal Expenses.

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