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FORM 99

Reports Analysis Division,
Federal Elections Commission
999 E Street, NW,
Washington, DC 20463

RE: Pre-Primary Report Covering the Period 1/1/12 5/16/12

To Whom It May Concern:

Our office acts as campaign counsel to Restoring Our Community (FEC ID# C00520130). In consultation with our client we have made the legal determination that our clients activities, including the committees paid staff time, constitute independent expenditures reportable to the Federal Elections Commission as such.

We were advised by Maureen in the Reports Analysis Division that we should file Form 99 explaining this determination and that all staff time is being treated as an independent expenditure, rather than an administrative expense, for purposes of the 2012 California Pre-Primary report.

Please feel free to contact me with any questions.

Sincerely,

Lance H. Olson

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