

A-G79 @B9CI G'H9LH'fl 97 : cfa ' - - Ł

Response to February 11, 2015 RFAI

In an RFAI dated February 11, 2015, pertaining to the Post-General Report (10/16/14-11/24/14), the FEC seeks clarification regarding ten itemized independent expenditures that had listed dissemination dates earlier than the actual payment dates. Similar to the RFAI response submitted on October 23, 2014 regarding the July Quarterly Report and the RFAI response submitted this date regarding the Pre-Primary Report, the payments in question (RFAI Attachment Pages 1 and 2) in all but one instances (Home Depot) were to sign distributors who sporadically showed up for payment based on the number of hours they indicated they had worked, and there was no written contract involved. Under the law as Space PAC understands it, these payments did not become independent expenditures until the payment date. Therefore, they did not trigger reporting requirements until payment (the disbursement date on the related reports).

The \$2,035.00 independent expenditure to Olivia Mancini (Attachment 2) with a listed dissemination date of October 19, 2014 was paid on October 20, 2014 and was included in a 24 Hour Notice dated October 21, 2014. The five expenditures with a dissemination date of October 20, 2014 (Attachment 2) had a payment date of October 29 and were reported on the 24 Hour Notice dated October 30, 2014 when the aggregate additional expenditures reached \$1,000.

The four expenditures listed in Attachment 1 of the RFAI had a listed dissemination date of October 27, 2014, but a payment date of November 6, 2014. Again, these expenses were not tied to a written contract and did not trigger reporting requirements until payment. The payment date for these expenditures fell outside the 24 hour reporting period, thus a 24 Hour Notice was not filed for them. These expenditures, however, were reported in the Post-General Report filed on December 3, 2014.
