

Attn: Connor McGuinness, Campaign Finance Analyst
Reports Analysis Division

Reports Analysis Division 1050 First Street, NE Washington, DC 20463

Re: Amended December Monthly Report (11/01/2019 - 11/30/2019), Received 1/24/2020

Dear Mr. McGuiness:

The NetJets Inc. PAC (Identification Number C00481309) received a Request for Additional Information dated June 16, 2020, attached, regarding the Amended December Monthly Report covering 11/01/2019 to 11/30/2019. The Federal Election Commission ("FEC") inquired about "an increase in disbursements totaling \$13,000.00 from the amounts disclosed on your original report."

The NetJets Inc. PAC filed its December Monthly Report on time on December 18, 2020, but inadvertently omitted one contribution made to the non-federal campaign committee DeWine Husted for Ohio on 11/12/2019 for \$13,000.00. Because this check was not cashed until December, it did not show up on the November bank statement. As a result, it wasn't until we gathered financial information for December in preparation to complete the Year-End Report covering 12/01/2019 to 12/31/2019 that we discovered this clerical error. Upon discovery, the NetJets Inc. PAC amended its December Monthly Report in Line 29 to show the \$13,000.00 contribution to a non-federal campaign committee.

The NetJets Inc. PAC filed the Amended December Monthly Report on January 24, 2020 to include the sole contribution to DeWine Husted for Ohio. Although not required by the FEC, but required under Ohio law, the NetJets Inc. PAC also filed the Amended December Monthly Report with the Ohio Secretary of State. Moments later, the NetJets Inc. PAC filed its Year-End Report with the FEC. Because the clerical error was discovered before filing the next report, no additional reports required any type of amendment.

It is our understanding that this letter serves as the written response necessary for the June 16, 2020 Request for Additional Information. We previously amended the December Monthly Report and do not believe any further action is necessary. Thank you for your assistance in addressing these requests. If you require further information, please contact legal counsel for the NetJets Inc. PAC using the following contact information.

> Nathanael Jonhenry, Esq. Squire Patton Boggs (US) LLP Nathanael.Jonhenry@squirepb.com (M) 440-864-2829

Sincerely

Matthew Sturges

Treasurer

NetJets, Inc. PAC

cc: Nathanael Jonhenry



RQ-2

June 16, 2020

MATHEW STURGES, TREASURER NETJETS INC. PAC 4111 BRIDGEWAY AVENUE COLUMBUS, OH 43219

Response Due Date

07/21/2020

IDENTIFICATION NUMBER: C00481309

REFERENCE: AMENDED DECEMBER MONTHLY REPORT (11/01/2019 - 11/30/2019), RECEIVED 01/24/2020

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. Failure to adequately respond by the response date noted above could result in an audit or enforcement action. Additional information is needed for the following 1 item(s):

- Your amended report discloses an increase in disbursements totaling \$13,000 from the amounts disclosed on your original report. Please amend your report or provide clarifying information as to why this activity was not disclosed on your original report. (11 CFR § 104.3)

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. Requests for extensions of time in which to respond will not be considered.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. For information about the report review process or specific filing information for your committee type, please visit www.fec.gov/help-candidates-and-committees. For more information about Requests for Additional Information (RFAI), why you received a letter, and how to respond, please visit www.fec.gov/help-candidates-and-committees/request-additional-information. Should you have any questions regarding this matter or wish to verify the adequacy of your



Federal Election Commission ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS The FEC added this page to the end of this filing to indicate how it was received.	
Hand Delivered	Date of Receipt
Postmarked USPS First Class Mail	Date of Receipt
USPS Registered/Certified	Postmarked (R/C)
USPS Priority Mail	Postmarked
	Postmarked
USPS Priority Mail Express	r ostinarked
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Overnight Delivery Service (Specify): Fed EX	Shipping Date
Next Business Day Delivery	
Date of Receipt Received from House Records & Registration Office	
Received from Senate Public Records Office	Date of Receipt
Received from Electronic Filing Office	Date of Receipt
Other (Specify):	Receipt or Postmarked
Spin	7/6/20
PREPARER	DATE PREPARED

PREPARER (3/2015)