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JSTREETPAC
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March 6, 2015

Nicole Miller
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Reports Analysis Division
FEDERAL ELECTION COMMISSION
Washington, DC 20463

Identification Number: C00441949
RE: Year-End Report (11/25/2014 - 12/31/2014)
Response Due Date: March 9, 2015

Dear Ms. Miller:

This letter is in response to the Commission's request for additional information related to reimbursements paid to the committee's connected organization and for memo entries disclosed on Schedule B, Line 23 of the above referenced report.

JStreet Pac properly reported disbursements to its connected organization for ""Reimb Operating Exp Including Salary and Accounting Services."" You have asked us to submit a memo entry including the name and address of each individual who received salary payments in excess of \$200 that were included in this entry, as well as the date, amount, and purpose of the original disbursement. JStreetPAC has reported similar reimbursements on numerous prior occasions without being required to submit the information requested in this RFAI. The regulation cited in your request does not in fact state that a committee must provide the kind of breakdown that is requested, and an Interpretive Rule issued by the Commission in July 2013, while requiring a breakdown of certain reportable items, none of which apply here, explicitly stated that it was only addressing the three specific situations addressed in the IR, and was ""not extending the clarification to situations in which a vendor, acting as the committee's agent, purchases goods and services on the committee's behalf from subvendors."" It should also be noted that if the connected organization had not been reimbursed for these salary payments, there would be no disclosure of the underlying individual salary payments at all. In order to avoid the additional administrative burden and privacy issues raised by itemizing individual salary reimbursements in a memo entry, committees will simply not reimburse their connected organizations for such payments, which will result in less disclosure to the public than the procedure we have long followed. In light of these arguments, we request that you provide us with some applicable statutory or regulatory authority for this request before we provide the requested salary information.

Additionally, the Commission has asked about \$14,287.51 in activity identified as memo entries on Line 23 of the above referenced report that do not appear to correspond with any itemized transactions. As the Committee noted on its 2014 Year-End Report, these memo entries do correspond with in-kind contributions to candidate committees disclosed on Line 23 of the 2014 Post-General Report. The in-kind contributions were originally reported at the time the service was provided and the memo entries disclose the payments made as required by the Commission and detailed in the Commission's Campaign Guide for Corporations and Labor Organizations.

If you have any additional questions, please feel free to contact the committee.

Sincerely,

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Jeremy Ben-Ami
