

February 5, 2009

Ms Sylvette S. Garnes Reports Analysis Division Federal Election Commission 999 E Street, NW Washington, DC 20463

Re: July Monthly Report (6/1/08 - 6/30/08) FEC ID# C00099259

Dear Ms Garnes:

In response to your letter dated January 7, 2009 requesting additional information:

- 1. We have amended the July Monthly Report to clarify the names of the donors who each contributed \$10,000 to the Committee. The suffix was inadvertently left off in the previous report, but that has been corrected now. The correct names are Benjamin Leon III (occupation of President) and Benjamin Leon, Jr. (occupation Chair/CEO). The Committee was not in receipt of excessive contributions.
- 2. The receipt of \$55,116.70 from "Lincoln & Mario Diaz-Balart Florida" as reported on Schedule A supporting Line 15 represents an offset of expenditures reported on Schedule B supporting Line 21(b). These expenditures relate to the Joint Fundraising Committee "Lincoln & Mario Diaz-Balart Florida". As soon as it was discovered that the Committee had paid expenses that the Joint Fundraising Committee (JFC) should have, the JFC reimbursed the Committee. All expenses and reimbursements occurred in the month of June 2008 and are reported on this report. The expenses paid by the Committee (all associated with an event the JFC held) and reimbursed by the JFC are reported on Line 21(b) as follows: \$1,500.00 for valet service, \$3,471.50 for restroom service, \$445.20 for Golf Cart service, \$9,450.00 for catering, \$250 for printing and \$40,000.00 for travel.
- 3. The receipts from "Campaign Account for John L. Mica" and "Friends of Dave Weldon" have been corrected and reported as Transfers from Affiliated/Other Party Committees on Schedule A supporting line 12.
- 4. As referenced in #2 above, the expenditures made for "catering" reported on Schedule B Line 21(b) relate to expenses paid for by the Committee that were reimbursed by the Lincoln & Mario Diaz Balart Florida joint fundraising committee as reported on Schedule A supporting Line 15.
- 5. As referenced in #2 above, the expenditures made for "printing" reported on Schedule B Line 21(b) relate to expenses paid for by the Committee that were reimbursed by the Lincoln & Mario Diaz Balart Florida joint fundraising committee as reported on Schedule A supporting Line 15.
- 6. All payments on Schedule H4 supporting Line 21(a) for "audio/video," "audio/visual," were for generic use of the Committee. None of these expenditures were for a communication that referred to a clearly identified candidate for Federal office or that promoted, supported, attacked or opposed any such candidate for Federal office.
- 7. We have filed an Amended July Monthly Report to disclose the fundraising allocation ratio on Schedule H2.
- 8. The negative disbursement from the "John McCain 2008" is not a voided check. It represents a reimbursement of expenses for use of copy machine, cleaning and cable expense utilized by representatives of the John McCain campaign. These operating expenses of the Committee were all paid by the Committee as administrative allocated activity, and

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therefore the reimbursement is recorded as such.

- 9. We have filed an Amended July Monthly Report to clarify the description for "merchant discount" on Schedule B (these are credit card fees). We have also amended Schedule H4 to clarify the descriptions for "administrative fees" (these are health insurance administrative fees).
- 10. We have filed Amended reports prior to 6/1/08 that should clear up the problem with the allocated activity or event year-to-date totals for the Administrative category. The year-to-date amount of \$2,492,085.32 is correct as of 6/30/08 for the administrative category.
- 11. We have filed an Amended July Monthly report to clarify the expenditure for "event tickets". It has been changed to "sponsorship of event" as it relates to generic Party advertising.

Sincerely, Abby F. Dupree, CPA