

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

We are responding to the letter dated May 24, 2013, which asks about Workers? Voice?s amended Post-General Report filed

on January 31, 2013. The numbers below correspond to the numbered segments of your letter.

1.Workers? Voice submitted 24-hour reports every day from October 18 through November 5, 2012. Specifically with respect to the 19 days covered by the amended Post-General Report, the Workers? Voice independent expenditures that are

itemized in the attachment to your letter were incurred entirely in connection with door-to-door canvassing. This canvassing was carried out on behalf of Workers? Voice by a combination of volunteers and individuals who were employed by other organizations. The paid time and associated expenses of the employed individuals were provided to Workers? Voice as in-kind contributions from numerous federal political committees, nonfederal political organizations and labor organizations.

In order to comply with the Commission?s rules and guidance with respect to reporting in-kind contributions received and independent expenditures made, every such in-kind contribution received was matched with a corresponding Workers? Voice

expenditure, which was often, but not always, an independent expenditure that usually, but not always, was required to be included on a 48-hour or 24-hour report. When it was so included it was reflected as an expenditure to its in-kind source, so that the Workers? Voice Form 3X would balance as required. Workers? Voice timely reported every independent expenditure about which it then had information with respect to the receipt of an in-kind contribution and its corresponding expenditure. Workers? Voice attributed to particular independent-expenditure communications the value of the in-kind resources that were used for that expenditure, using the figures provided to Workers? Voice by the in-kind contributors of the personnel and other resources that were deployed. Workers? Voice credited these in-kind amounts to the respective dates when they were deployed to disseminate Workers? Voice?s independent-expenditure communication. Workers? Voice devised an internal system to account for these in-kind receipts and to associate them with Workers? Voice independent expenditures and other activities, and it worked closely with each of its in-kind contributors to amass the requisite in-kind contribution information from them in a timely manner. This system, and Workers? Voice?s overall method of operation, which entailed the absorption of considerable in-kind resources in multiple states and races, sometimes experienced the provision by an in-kind contributor and the receipt by Workers? Voice of information about the nature, value and timing of in-kind resources that were received and deployed that was too late to include in the appropriate 48-hour or 24-hour report. When Workers? Voice received such late information, it either or both amended the relevant 48-hour (or 24-hour) report and included the information on its regularly scheduled Form 3X that covered the period at issue. The Post-General Report was amended twice, including since we received your letter, in order to conform it to late-received information.

We understand from a subsequent telephone conversation with you that your office does not request that Workers? Voice further amend its 24-hour reports that were submitted during 2012, although we are prepared to do so upon request.

2.Field Works was a vendor that provided canvassing services for independent expenditures in Virginia. At the time the services were performed, Workers? Voice filed timely reports reflecting its best information and estimates regarding the amounts spent and allocating them among various federal candidates. After the original Pre-General Report was filed, final information became available and Workers? Voice ascertained that these figures warranted adjustment. The corrected figures were among the

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

amendments in the January 31, 2013, amended Post-General Report. As it turned out, the 24-hour reports and the original Post-General Report overstated Workers? Voice?s costs that were attributable to Field Works? services by \$7474.80.

Worker?s Voice engaged Pivot Group as a mail vendor in connection with independent expenditures in support of Senate candidate Jon Tester. Workers? Voice timely reported on a 24-hour report and the original Post-General Report the amount incurred as \$16,588.26, which proved to be an underestimate of \$4,743.71, which was corrected on the January 31, 2013 amended report.

Workers? Voice engaged American Products as a button vendor in connection with independent expenditures in support of presidential candidate Barack Obama. Workers? Voice timely reported on a 24-hour report and the original Post-General Report the amount incurred as \$15,000, which proved to be an overestimate of \$40.28, which was corrected on the January 31, 2013 amended report.

\*\*\*\*\*