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Response to FEC Letter of June 6, 2014, requesting additional information for the April Monthly Report (03/01/2014 - 03/31/2014)

Item 1 - The Verizon and McCardle-Nichols transactions were reported as Schedule A, Line 15 refunds, but Report has been amended, with these transactions now being reported as Schedule B, Line 21(a) expense refund. This has resulted in a change of the non-federal allocable total from \$18,212.27 to \$17,501.67. The difference of \$710.60 has been transferred back to the non-federal account (Confirmation Number 0708140022).

Item 2 - To clarify the nature of these transfers requires the examination of Reports dating back to the December Monthly Report (11/01/2013 - 11/30/2013). Prior to this Report, no transfers were made for the preceding 7 months. For the month of November/2013, the Line 21(a)(ii) non-federal share for allocated activity is \$78,231.05. A transfer from non-federal account of \$15,000 on 12/20/2013 was made and reported on the January Monthly Report. It is understood that transfers for allocated activity must be made within a 70-day time period, 10 days before or 60 days after payment to vendor. Two additional transfers were made for the month of November in conjunction with the 60 day rule. These transfers were made on Jan 13, 2014 for \$10,000 and on Jan 14, 2014 for \$18,000 for a total of \$28,000, which is part of the \$67,000 in transfers mentioned in your letter. The total 21(a) allocable expenses for the time period from Nov. 15 thru Nov. 30, which falls within the 60 day window, was \$44,136.91, and the non-federal allocable part is \$34,868.16, of which \$28,000 was transferred as stated above.

For the month of December/2013, the Line 21(a)(ii) amount is \$52,152.82. A transfer from non-federal account of \$25,000. on 01/30/2014 was made and reported on the Feb. Monthly Report. This amount is also part of the \$67,000 in transfers.

For the month of January/2014, the Line 21(a)(ii) amount is \$9744.62. A transfer from non-federal account of \$4000 on 03/19/2014 was made and reported on the April Monthly Report. The total 21(a) allocable expenses for the time period from Jan. 21 thru Jan. 31, which falls within the 60 day window for this transfer, was \$6145.99, and the non-federal allocable part is \$4855.33, of which \$4000 was transferred as stated above. This amount is also part of the \$67,000 in transfers.

For the month of February/2014, the Line 21(a)(ii) amount is 10879.08. A transfer from non-federal account of \$10,000 on 03/26/2014 was made and reported on the April Monthly Report. This amount makes up the final part of the \$67,000 in transfers.

For the month of March/2014, the revised Line 21(a)(ii) amount is \$17,501.67. A transfer from non-federal account of \$18,212.27 on 04/10/2014 was made and reported, and as stated in Item1, a transfer back to the non-federal account of \$710.60 has been made to correct the difference.

This completes the analysis and hopefully offers a clear explanation of all transfers.