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NAME OF COMMITTEE (In Full)
FEDUP POLITICAL ACTION COMMITTEE AKA FEDUP PACFEC IDENTIFICATION NUMBER
C00455923Mailing Address 9625 Surveyor Court
Suite 400City State ZIP Code
MANASSAS VA 20110Mr. Michael Adamsky
Senior Campaign Finance Analyst
Federal Election Commission
1050 First St NE
Washington DC 20463

RE: April Quarterly Report (01/01/2020 - 03/31/2020)

Dear Mr. Adamsky:

This memo is in response to the request for additional information dated June 16, 2020 regarding the above referenced report. We have filed an amendment to the April Quarterly Report to address the items raised in the letter. We have also filed an amendment to the June Quarterly Report.

To clarify the April Quarterly Report amendment, the write off of receivables for FedUp PAC in the amount of \$577,854.52 are treated as in-kind contributions solely for purposes of FECA. The amounts were written off in 2019 by the vendors and for purposes of the consolidated 2019 tax return of The Viguerie Company. The consolidated return covers businesses American Target Advertising (ATA), American Target Advertising - Internet Division (ATA-Internet), and American Mailing Lists Corporation (AMLC)

Certain amounts of receivables from FedUp PAC were deemed uncollectable under the standard for corporate tax returns and tax law. Those amounts are:

ATA	\$7,120.63
ATA-Internet:	\$531,590.65
AMLC	\$39,143.24

Grand Total:	\$577,854.52

Because of differences in the attributions of payments between the vendors and the FedUp PAC as disclosed on FEC reports, the amounts forgiven as reflected on the April Quarterly FEC report are:

ATA	\$7,120.63
ATA-Internet:	\$529,396.80
AMLC	\$38,851.24

Grand Total:	\$575,368.67

ATA- Internet also paid \$5,222.39 of invoices to Data Management Inc.(DMI) as part of its write-off. These invoices were incurred as the result of work DMI performed in conjunction with ATA-Internet on behalf of FedUp PAC.

The obligations owed by FedUp PAC are done under the standard "no-risk" arrangement used for the company's nonprofit clients. ATA is the direct marketing agency; AMLC the list broker. Amounts deemed uncollectable for nonprofit clients are written off as well, but are not treated as corporate contributions to those nonprofit clients.

Per a September 21, 2016 letter from the Federal Election Commission these write offs being deemed uncollectable are being treated as in-kind contributions to FedUp PAC under the "no-risk" arrangement, and are hereby being disclosed by the recipient committee.