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March 3, 2014

Sarah Juris
Campaign Finance Analyst
Reports Analysis Division

Re:Amended September Monthly Report (08/01/2013 - 08/31/2013)
October Monthly Report (9/01/2013 - 9/30/2013)
November Monthly Report (10/01/2013 - 10/31/2013)
December Monthly Report (11/01/2013 - 11/30/2013)

On behalf of our client, The Caterpillar Inc. Employee Political Action Committee (?Committee?), this letter responds to your following requests for additional information:

?a letter dated December 6, 2013, regarding the Committee?s amended September Monthly Report (?September RFAI?);

?a letter dated December 5, 2013, regarding the Committee?s October Monthly Report (?October RFAI?);

?a letter dated February 5, 2014, regarding the Committee?s November Monthly Report (?November RFAI?); and

?a letter dated January 27, 2014, regarding the Committee?s December Monthly Report (?December RFAI?) (together, the ?Letters?).

Each Letter seeks information about contributions, included in the Committee?s September, October, November, and December reports, made by contributors with mailing addresses outside of the United States. The contributors to the Committee named in your request are all employees of Caterpillar Inc. or its subsidiaries (collectively, ?Caterpillar?), and based on Caterpillar?s review of employee records, are all United States citizens or lawful permanent residents.

The Committee notes that the September RFAI seeks additional information about a Robert Chen who contributed \$86.05. The Committee was unable to find a Robert Chen listed in its Amended September Monthly Report. The Committee did, however, find a Robert Coon, with a foreign mailing address, listed in its Amended September Monthly Report as having contributed \$86.05. Mr. Coon is a U.S. citizen. The September RFAI does not seek additional information about Mr. Coon, but the rest of the Letters do. Accordingly, the Committee assumes that the September RFAI seeks information about Mr. Coon, not Robert Chen.

Caterpillar is a global enterprise incorporated and headquartered in the United States that has corporate operations in over 180 countries. As a routine business practice, Caterpillar transfers its U.S. employees to its operations throughout the world to assist in the conduct of Caterpillar?s business activities in countries other than the United States. The international mailing addresses listed on the Committee?s September, October, November, and December Monthly Reports, referred to in the Letters, reflect these foreign assignments.

Please note that the Committee amended its FEC Form 1 on November 20, 2013, listing a new email address that corresponded with the Committee?s change of its PAC vendor. Due to these administrative changes, the Committee was not aware of the first two Letters until after the deadlines to respond to those letters had passed. Because the same issue is common to all four Letters, the Committee respectfully requests this letter be considered a timely response to all four inquiries.

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Respectfully submitted,

Robert D. Lenhard
Covington & Burling LLP

cc: Michael C. Morrison
Treasurer
The Caterpillar Inc. Employee Political Action Committee
