

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

February 22, 2016

Sarah Juris  
Campaign Finance Analyst  
Reports Analysis Division

Re:August Monthly Report (07/01/2015 - 07/31/2015)  
September Monthly Report (8/01/2015 - 8/31/2015)  
October Monthly Report (9/01/2015 - 9/30/2015)  
November Monthly Report (10/01/2015 - 10/31/2015)  
December Monthly Report (11/01/2015 - 11/30/2015)  
Year End Monthly Report (12/01/2015 - 12/31/2015)

This response and the corresponding amendments filed today address the following Requests For Additional Information (RFAs) you sent to The Caterpillar Inc. Employee Political Action Committee ("the Committee"):

?a letter dated February 4, 2016, regarding the Committee?s August Monthly Report (?August RFA?); and

?a letter dated February 4, 2016, regarding the Committee?s September Monthly Report (?September RFA?).

The August RFA seeks clarification about the aggregate year to date totals disclosed on Schedule A. Only one single contributor's aggregate figure year to date total needs to be addressed in our response. The issue stems from a refund made by the PAC and disclosed on page 205 which was not accounted for in the aggregate year to date total for his contributions disclosed on page 136. Though the aggregate year to date total disclosed on Schedule A of this report did accurately display the total amount collected from this individual, we have amended the August Monthly Report and all subsequent 2015 filings to update the year to date totals to show the impact of the refund made on 7/1/2016 to this individual.

The September RFA seeks clarification about a negative receipt disclosed on Schedule A of the report (on page 143). We understand the Commission's concern that was actually a refund incorrectly disclosed on our report. Although the Committee correctly handled the refund for this individual, our Payroll Department also took action to void the contributor's deduction. Therefore, this voided deduction must be accurately disclosed, and the amended report will include a clarifying note. Subsequently, we worked both the contributor and the Payroll Department to settle the matter. Therefore, all individual transactions (deductions collected, voided deduction, and refund to the contributor with a PAC check) have been accurately disclosed on our reports. With the updates made to the aggregate year to date totals referenced above, this matter will be settled.

Based on our review of the reports and your discussion with our vendor, the Committee understands that this letter, and the amendments also submitted today, will be considered a timely and adequate response to both inquiries.

Respectfully submitted,

Benjamin Cordani  
Treasurer  
The Caterpillar Inc. Employee Political Action Committee