

A-G79 @B9CI G'H9LH'fl 97 : cfa ' - - t

NAME OF COMMITTEE (In Full)
For Our Future

FEC IDENTIFICATION NUMBER
C00620971

Mailing Address 1411 K Street NW, Suite 900

City	State	ZIP Code
Washington	DC	20005

We are responding to your letter dated July 5, 2017.

RFAI Regarding Pre-General Report Filed on 4/13/2017

1. Missing 48 Hour Report (Schedule E)

In 2016, the Committee filed 48-hour reports of independent expenditures via canvassing at least weekly. Weekly reports estimated canvassing costs for the period beginning two days prior to the day the report was filed through the fourth day after the day the report was filed; for example, a report filed on Wednesday covered the previous Monday until the following Sunday. The purpose of doing so was to timely report independent expenditures whose actual cost could not be determined until after the fact.

Due to this weekly reporting approach, the week from September 26 until October 2 spanned the October Quarterly Report and the Pre-General Report. The Committee originally reported these costs on 48-hour reports with the description "Estimated Cost for Canvassing Services for 9/26-10/2." The actual cost of canvassing, calculated later, was subsequently divided in order to align with the two scheduled reporting periods, and were respectively reported as "Actual Cost for Canvassing Services from 9/26-9/30" and "Actual Cost for Canvassing Services from 10/1-10/2."

The Committee originally identified For Our Future Action Fund (FOFAF) as the vendor on numerous 48-hour reports; however, some of those attributions were incorrect because other vendors were used instead. Accordingly, the Committee's 48-hour reports were timely, but when the same independent expenditures appeared on Schedule E of the Pre-General Report with the vendor identities corrected and, in some cases, actual costs substituted for estimated costs, it appeared that the independent expenditures had not been reported on 48-hour reports, when, in fact, they were. We provide additional detail below.

Two Extra Extras, Inc. independent expenditures of \$2,497.50 each (respectively, supporting Hillary Clinton and opposing Donald Trump) disclosed on the Pre-General Report with the dissemination date of October 1 were originally timely disclosed on the September 28 48-hour report, on page 4, as part of the \$76,200.51 "Estimated Cost for Canvassing Services for 9/26-10/2", with FOFAF listed as the vendor. The December 8 Amended Pre-General Report corrected the vendor identification and attributed them to October 1 and 2. Accordingly, there was no missing 48-hour report.

The same kind of reporting sequence applies to eleven of the independent expenditures on the December 8th Amendment to the Pre-General Report that listed Paychex as the vendor, with dissemination dates of October 1, 3 and 10. In fact, each independent expenditure was timely disclosed on 48-hour reports with accurate candidate attributions and estimated amounts, but with FOFAF inaccurately listed as the vendor. Additionally, as discussed above, one week's estimate spanned two reporting periods, so they were divided between September 26-30 and October 1-2.

Specifically, the Schedule E entries were reported as follows on various 48-hour reports:

Two \$15,526.64 actual costs reported on Schedule E of the first amended Pre-General report were originally reported on page 4 of a September 28th 48-hour report as part of two \$76,200.51 "Estimated Cost for Canvassing Services for 9/26-10/2" entries regarding Clinton and Trump.

Two \$52,166.22 actual costs reported on Schedule E of the first amended Pre-General report were originally reported on Pages 5 & 6 of an October 10th 48-hour report as part of two \$73,470.70 "Estimated Cost for Canvassing Services for 10/10-10/16" entries regarding Clinton and Trump.

A \$4,686.70 actual cost reported on Schedule E of the first amended Pre-General report was originally reported on Page 9 of a September 28th 48-hour report as part of a \$14,655.20 "Estimated Cost for Canvassing Services for 9/26-10/2" regarding Patrick Murphy.

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

NAME OF COMMITTEE (In Full)
For Our Future

FEC IDENTIFICATION NUMBER
C00620971

Mailing Address 1411 K Street NW, Suite 900

City	State	ZIP Code
Washington	DC	20005

A \$1,562.23 actual cost reported on Schedule E of the first amended Pre-General report was originally reported on Page 8 of a September 28th 48-hour report as part of a \$4,885.07 ?Estimated Cost for Canvassing Services for 9/26-10/2? regarding Marco Rubio.

A \$4,686.70 actual cost reported on Schedule E of the Pre-General report was originally report on Page 4 of an October 5th 48-hour report as part of a \$13,789.13 ?Estimated Cost for Canvassing Services for 10/3-10/9? regarding Patrick Murphy.

A \$1,562.23 actual cost reported on Schedule E of the Pre-General report was originally reported on Page 4 of an October 5th 48-hour report as part of a \$4,596.38 ?Estimated Cost for Canvassing Services for 10/3-10/9? regarding Marco Rubio.

A \$9,539.03 actual cost reported on Schedule E of the first amended Pre-General report was originally reported on page 8 of an October 12 48-hour report as part of a \$16,507.61 ?Estimated Cost for Canvassing Services for 10/10-10/16? regarding Patrick Murphy.

A \$3,179.68 actual cost reported on Schedule E of the first amended Pre-General report was originally reported on Page 8 of an October 12 48-hour report as part of a \$5,502.54 ?Estimated Cost for Canvassing Services for 10/10-10/16? regarding Marco Rubio.

A \$12,577.50 actual cost reported on Schedule E of the first amended Pre-General report (pg. 264) was originally reported on Page 7 of an October 12th 48-hour report as part of a \$11,286.63 ?Estimated Cost for Canvassing Services for 10/10-10/16? regarding Ted Strickland.

To elaborate with an example, consider the \$15,526.64 Paychex pro-Clinton entry in Schedule E for ?Payment for Canvassing Services from 10/1-10/2? on page 274 of the April 13th, 2017 Amended Pre-General Report. This amount is one of four final entries associated with the original estimate of \$76,200.51 for pro-Clinton independent expenditures that were disseminated beginning on September 26, and disclosed on a 48-hour report filed on September 28 (as ?Estimated Cost for Canvassing Services for 9/26-10/2?) that listed only FOFAF as the vendor. The final disclosure of these same independent expenditures on the Pre-General Report corrected the vendor and reported actual versus estimated costs. The final tallies appear on the December 8 Amended Pre-General Report as follows:

- pg. 220 (\$48,823.03 Payment for Canvassing Services from 9/26-9/30 to FOFAF)
- pg. 259 (\$19,049.87 Payment for Canvassing Services from 9/26-9/30 to Paychex)
- pg. 222 (\$5,172.06 Actual Cost for Canvassing Services from 10/1-10/2 to FOFAF), and
- pg. 270 (\$15,526.64 Payment for Canvassing Services from 10/1-10/2 to Paychex).

Accordingly, all of these independent expenditures were timely reported.

The Committee is filing an additional amended Pre-General report contemporaneously with this response in order to correct a newly determined transposition of FOFAF and Paychex as the vendors with respect to certain independent expenditures that were otherwise timely and correctly reported, including all of the above items except the last one concerning Strickland.

Four other independent expenditures (\$254 each for Nelson and Gallagher and \$1,355.89 for Feingold and Johnson) were in fact timely reported as estimates on two separate 48-hour reports, filed on October 5th and Sept. 28th, respectively, but with different amounts and different vendors.

The Feingold and Johnson entries were timely disclosed on a September 28 48-hour report on page 26 as part of a FOFAF (not Paychex) \$6,878.50 ?Estimated Cost for Canvassing Services for 9/26-10/2.? The dissemination date was reported on

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

NAME OF COMMITTEE (In Full)
For Our Future

FEC IDENTIFICATION NUMBER
C00620971

Mailing Address 1411 K Street NW, Suite 900

City State ZIP Code
Washington DC 20005

the 48-hour report as September 26. These entries later appeared on the December 8 Amended Pre-General Report on pages 271-272 as \$1,355.89 each for ?Payment for Canvassing Services from 10/1-10/2.?

The Gallagher and Nelson entries were timely disclosed on an October 5 48-hour report as part of a \$1,740.00 ?Estimated Cost for Canvassing Services for 9/26-10/2, ? because the applicable \$10,000 threshold was not reached until October 3. The actuals appeared on the December 8th Amendment to the Pre-General Report on pages 272 (Gallagher) and 273 (Nelson) with October 1 as a dissemination date.

These entries changed once again on the December 8 Pre-General Report to be \$254.90 on pages 272 and 273 for Gallagher and Nelson, respectively, to account for the fact that the entries should only include actual canvassing costs for two days during the reporting period-- October 1 and 2. Similarly, the Johnson and Feingold entries were amended to only account for those dates on pages 271 and 272 (\$1,355.89 each).

Eight independent expenditures that were included on the October 5 and October 12 48-hour reports listed FOFAP as the vendor, rather than the actual vendor, Paychex, in the following amounts:

Two \$1,126.69 actual costs listed on Schedule E of the Pre-General Report were originally reported on Page 8 of an October 5 48-hour report as part of a \$2,178.00 ?Estimated Cost for Canvassing Services for 10/3-10/9? regarding Nelson and Gallagher.

Two \$1,190.95 actual costs listed on Schedule E of the Pre-General report were originally reported on Page 10 of an October 12 48-hour report as part of a \$1,851.00 Estimated Cost for Canvassing Services for 10/10-10/16? regarding Nelson and Gallagher.

Two \$5,993.24 actual costs listed on Schedule E of the Pre-General report were originally reported on Page 7 of an October 5 48-hour report as part of a \$11,452.43 ?Estimated Cost for Canvassing Services for 10/3-10/9? regarding Johnson and Feingold.

Two \$6,335.06 actual costs listed on Schedule E of the Pre-General report were originally reported on Page 9 of an October 12 48-hour report as part of a \$9,866.34 ?Estimated Cost for Canvassing Services for 10/10-10/16? regarding Johnson and Feingold.

Seven independent expenditures to Fieldworks LLC and four to GRSG were disseminated on October 10 but inadvertently omitted from 48-hour reports. The Committee reported all of them on the original Pre-General Report filed on October 27, 2016.

Two independent expenditures to Grassroots Campaigns Inc (GCI), regarding candidates Patrick E. Murphy and Marco Rubio, that were disseminated on October 1 were timely reported on the October 1 48-hour report for the period September 26-October 2. The portion of canvassing for the dates September 26-30 were included in the October Quarterly Report and only the portion of canvassing for October 1 and 2 were included in the first amendment to the Pre-General Report filed on December 8, 2016.

Two independent expenditures to Grassroots Campaigns Inc (GCI) regarding Kathleen McGinty and Patrick Toomey in the amount of \$724.96 each that were disseminated on October 3 were inadvertently not included in 48-hour reports, but were included on the original Pre-General Report on page 229 as ?Actual Cost for Canvassing Services for 10/3-10/9.?

2. Late 48 Hour Report (Schedule E)

All four independent expenditures that were reported on October 12 were timely, because in each of the two pertinent

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

NAME OF COMMITTEE (In Full)
For Our Future

FEC IDENTIFICATION NUMBER
C00620971

Mailing Address 1411 K Street NW, Suite 900

City	State	ZIP Code
Washington	DC	20005

having re-set at zero most recently on October 5, when the previous 48-hour reports were filed.

The independent expenditure to Bouchard Gold was timely reported on October 19 because the pertinent \$10,000 reporting threshold in the Wisconsin U.S. House election was not reached until October 17.

3. Missing Schedule E (48 Hour Report)

The Committee timely filed a 48-hour report on October 12th disclosing the ?Estimated Cost for Canvassing Services for 10/10-10/16? for Grassroots Campaigns Inc. canvassing services for the week of Oct. 10-16. When the Committee reconciled estimated and actual costs for the original and amended Pre-General Reports, the Committee converted figures provided by GCI to the Committee?s standard internal reporting weeks of October 3-9 and October 10-17. Final Schedule E does reflect the amounts that the 48-hour reports disclosed.

Two independent expenditures that were disseminated on October 10th with Extra Extras, Inc. as the vendor, regarding Clinton and Trump, were reported on Schedule E, as \$9,022.50 (actual amount) on pages 194 and 195 on the original filing of the Pre-General Report. The \$13,647.20 figures reported on page in the October 12 48-hour report were estimates for this same activity ?Estimated Cost for Canvassing Services for 10/10-10/16?).

The Committee did not include on Schedule E two October 3 independent expenditures for \$184.60 each that were disclosed on the October 5 48-hour report, regarding candidates Catherine Cortez Masto and Joe Heck, because the Committee determined that these expenditures did not occur.

The eight other independent expenditures to FOFAF as a vendor are expenditures that the Committee attributed to FOFAF on 48-hour reports (with estimated amounts), but then corrected to the vendor Paychex on Schedule E of the original Pre-General Report (with actual amounts). For example, the Committee disclosed on its October 5 48-hour report on page 7 an estimated cost of \$11,452.43 for ?Estimated Cost for Canvassing Services for 10/3-10/9? in opposition to Ron Johnson disseminated on October 3 with FOFAF mislabeled as the vendor. The actual cost was \$5,993.24 with Paychex as the vendor; this expenditure is disclosed on page 261 of the original Pre-General Report as a ?Payment for Canvassing Services for 10/3-10/9.?

The Committee explained the \$1,000 independent expenditure expense to vendor Mark Lee in the following memo text on its April 13 Amended Pre-General Report:

?The committee has removed schedule E memo transactions and corresponding debt owed to Mark Lee. The committee has determined that this activity was disclosed through the vendor Hilltop Public Solutions and this individual was paid through this vendor as a sub-vendor, and was not in fact a separate expense as it was originally disclosed.?