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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

We are responding to your letter dated June 9, 2019, Response due date July 15, 2019

20005

RFAI Regarding 30-Day Amended Post-General Report (10/18/2018-11/26/2018) filed December 21, 2018

1.Increase in Receipts by \$133,489

Shortly after filing its Original Post-General Report on December 6, 2018, the Committee determined that in-kind contributions in the form of staff salaries and benefits were inadvertently omitted from the filing. The \$133,489 increase in receipts from the Original Post-General Report to the Amended Post-General Report was due to four in-kind contributions from AFSCME in the following amounts: \$70,745, \$9,522, \$21,201, and \$32,021.

The Committee periodically receives letters providing notifications from various outside organizations of in-kind contributions in the form of staff salaries, public communications, or other things of value and includes those contributions on its reports to the Commission, including, for example, similar contributions from AFSCME disclosed by the Committee on its 2018 Pre-General and October Quarterly Reports. However, in this instance, an internal miscommunication regarding the notification received from AFSCME prior to the filing deadline resulted in inadvertent omission of these in-kind contributions from the original Post-General Report. Once the Committee discovered the omission, the Committee amended its Post-General Report to disclose the omitted in-kind contributions, resulting in an increase in receipts of \$133,489. The Committee has reviewed its internal communication procedures in an effort to prevent similar omissions in the future.

2. Missing Schedule E Entries

Your June 9 letter states that the Committee ?filed a 24-hour report for an independent expenditure(s) which has not been itemized on Schedule E supporting line 24? of the Committee?s Amended Post-General Report. Your letter goes on to reference 8 entries. Each of the independent expenditures included in these entries is, in fact, included on the Committee?s Amended Post-General Report. However, the amounts disclosed on the Amended Post-General Report: (1) reflect

the actual (as opposed to estimated) amounts of these independent expenditures for the dissemination dates listed; and (2) result from combining related entries disclosed on the Committee?s 24-hour reports into fewer Schedule E entries for overlapping time periods.

On October 19, the Committee filed a 24-hour report containing two estimated values for canvassing activities for the time period of October 18 through November 6 (Election Day) for the Senate election in Florida. On October 26, the Committee also filed a 24-hour report containing estimated values for canvassing for the time period of October 26? November 6 (Election Day) for various Congressional elections in Virginia and both candidates in the Virginia Senate election. The Committee later determined that canvassing activities in the final days of the election would be at a higher volume than originally estimated on its October 19 and October 26 24-hour reports. As a result, the Committee reported additional estimated expenditures for canvassing costs for the period November 2 through November 6 in those elections on its November 3 24-hour report, covering part of the same time period as the 24-hour reports filed on October 19 and October 26.

In the Post-General Report, the Committee elected to combine the two estimated canvassing amounts into a single entry per candidate in Schedule E for the period covering October 18 through November 6 for expenditures reported on the October 19 and November 3 24-hour reports for the Senate election in Florida, and a single entry per candidate for expenditures covering October 26 through November 6 for expenditures reported on the October 26 and November 3 24-

reports for the Virginia congressional elections and the Virginia Senate election. Therefore, it appears as if there is a missing entry

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for the November 3 24-hour report, but instead, the Committee simply combined the actual amounts (as determined after Election Day when final payrolls for the period were available) into single entries for each election?s canvassing activities during the applicable period.

For example, the independent expenditures estimated to be valued at \$30,568.81 each for support-Nelson and oppose-Scott canvassing activities disclosed on a November 3, 2018 24-Hour Report correspond with the entries for actual costs on pages 111A and 111B of the Original Post-General Report and pages 113A and 113B of the Amended Post-General Report. The

description of the actual expenditure says that the amount listed of \$226,755.89 is for ?Actual Cost for Canvassing Services From 10/18-11/6 As Discl. on 10/20 and 11/3 24-Hr Reports.? The Committee originally disclosed its best estimate of canvassing services on October 19. Instead of creating a separate Line 24 entry in the Post-General Report for the actual amounts of the increased canvassing estimates reported on the November 3, 24-hour report, the Committee combined the actual amounts entries into one entry. The Committee similarly combined the actual amounts for the estimates disclosed on 24-hour reports filed on October 26 and November 3 for the independent expenditures in the Virginia Senate election and the Virginia House elections.

The Committee has also determined that, in the process of aggregating these expenditures from two entries into one entry per candidate, the language describing the purpose of the expenditures for three entries for canvassing services was mistakenly added to three entries for phone banking services for or against the same three candidates. Accordingly, the Committee is filing an amendment to the Post-General Report, removing references to the November 3 24-hour report from three phone banking entries supporting Virginia House candidates Cockburn and Spanberger and opposing Virginia Senate candidate Stewart, and is adding a reference to the November 3 report to the canvassing services entries for the same three candidates.

Additionally, the Committee has determined that when filing its Original Post-General Report, it inadvertently referred to expenditures reported on an October 19th 24-hour report as being reported on an October 20th report, which are referred to as both a 24-hour and 48-hour report in different purpose lines for different expenditures on the Post-General Report. The Committee timely-reported each expenditure on the October 19th 24-hour report and did not file a report on October 20th as one was not required. The Committee will also amend the Post-General Report to replace references to October 20th with the correct date, October 19th.

3. Missing 24-Hour Report Supporting Senator Tammy Baldwin

During the period between Election Day and the filing deadline for the Post-General Report, the Committee?s compliance staff went through the process of reconciling the Committee?s reported 2018 independent expenditures with invoices received from various vendors for public communications, including a digital advertising vendor that submits invoices to the Committee on a monthly basis. During this reconciliation process, the Committee determined that there were two versions of a particular 54-second digital video advertisement. One version of the ad contained no reference to any candidate, and originally launched on October 12. An edited version of the same ad later launched on October 25. The October 25 version of the ad was identical to the October 12 version, except that it contained approximately two seconds of (arguably express advocacy) text references to four candidates, including one federal candidate, Senator Tammy Baldwin. By the time the Committee?s compliance staff discovered the edited October 25 version of the ad while reconciling invoices for the month of October, the October 27 deadline for filing

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a 24-hour Report had lapsed. So, the

Committee included the ad on Schedule E of its Original Post-General Report filed on December 6, 2018.

4. New Partners Teleservices Voter Outreach Calls and Vote Goal Organizing

?New Partners Teleservices Voter Outreach Calls Supporting Jackie Rosen

The Committee reported certain independent expenditures to New Partners Teleservices on 24- and 48-hour Reports with amounts that differ from actual reports disclosed on the Committee?s Original and Amended Post-General Reports. This is due to the fact that this vendor bills the Committee based on contacts with voters (the ?contact rate?), which can only be estimated when advance reporting is required during the 24- and 48-hour reporting periods. Though the Committee reports the best estimate of cost available based on the projected contact rate, the actual cost will vary up or down from the estimated costs due to the actual contact rate.

On October 19, the Committee disclosed on a 48-hour Report an independent expenditure to New Partner Teleservices in the

amount of \$4,793.00 in support of Jackie Rosen for Senate in Nevada with the purpose of disbursement listed as ?Estimated Cost for Voter Outreach Calls? and a dissemination date of October 17. That entry corresponds with an actual amount of \$467.50 on page 194B of the Committee?s Original Post-General Report and page 196B of its Amended Post-General

Report. The Committee originally estimated that it would incur more costs for these calls, as it anticipated that both contact rates and call volume would be higher during this period than what actually occurred.

For independent expenditures reported on the Committee?s October 26 24-hour Report, the opposite occurred. The Committee disclosed an independent expenditure to New Partner Teleservices in the amount of \$3,946.50 in support of Rosen with the purpose of disbursement listed as ?Voter Outreach Calls.? That entry corresponds with an actual amount of \$7,432.00, which is included on page 198A of the Committee?s Original Post-General Report and page 200A of its Amended Post-General Report.

?Vote Goal Organizing in Florida Senate Election

On October 19, the Committee disclosed on a 24-Hour Report an independent expenditure to Vote Goal Organizing in the amount of \$110,598.25, in support of Bill Nelson for Senate in Florida with the purpose of disbursement listed as ?Canvassing Services? and a dissemination date of October 19. This entry corresponds with the actual amount of \$110,671.75 disclosed on page 206B of the Original Post-General Report and page 208B of the Amended Post-General Report.

The Committee originally anticipated a slightly lower cost for this expenditure than the actual cost later invoiced to the Committee.

On October 19, the Committee disclosed on a 24-Hour Report an independent expenditure to Vote Goal Organizing in the amount of \$55,299.13, opposing Rick Scott for Senate in Florida with the purpose of disbursement listed as ?Canvassing Services? and a dissemination date of October 19. This entry corresponds with an actual amount of \$55,372.63 disclosed on page 207A of the Committee?s Original Post-General Report and page 209A of the Committee?s Amended Post-General Report. The Committee originally anticipated a slightly lower cost for this expenditure than the actual cost later invoiced to the Committee.