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March 20, 2013

Mr. Daniel Buckley Senior Campaign Finance Analyst Federal Election Commission Washington, D.C.

Re:Year-End Report (11/27/12-12/31/12)

Dear Mr. Buckley:

In response to your letter dated February 13, 2013 requesting additional information:

1.The \$26,602.91 total transfers during the period include a transfer on 10/29/12 in the amount of \$15,403.21. This transfer includes \$7,996.90 for the non-federal share of joint activity for the period 9/1/12-9/30/12 and \$7,406.31 for the non-federal share of joint activity for the period 10/1/12-10/18/12. While the transfer for that activity is included in the total transfers for the reporting periods cited, the activity for 9/1/12-9/30/12 is in a reporting period not among those cited, so not included in the total joint activity amount. However, the transfer for the September allocated activity was made within the 70-day time period permitted. No transfer back to the non-federal account is necessary.

Sincerely,

Nancy H. Watkins, C.P.A.