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December 23, 2011

Federal Election Commission
Reports Analysis Division
999 E Street, NW
Washington, DC 20463

## VIA FAX AND COURIER

Dear Sir or Madam:
Please be advised that this firm represents the Leaders for Families Super PAC, Inc. ("Committee"). This letter explains the best efforts inade by the Committee to comply with the 24-hour reports required when making independent expenditures exceeding $\$ 1,000$ within 20 days of an election.

Leaders for Fanuilies Super PAC; Inc. was formed on December 21, 2011. On December 22,2011, the Committee disseminated an autodial call featuring express advocaey of a federal candidate costing $\$ 5,447.25$. On December 23, 2011, the Committee also placed a buy for a radio ad to be broadcast starting December 27, 2011, featuring express advocacy of a federal candidate, which will cost $\$ 8,945.00$. These communications were and will be publicized in Iowa and refer to the presidential caucus there, which takes place on January 3, 2011. Therefore, the group triggered political committee status on December 22, 2011, 11 CFR $\S 100.5$ (a) and has ten days to file its statement of organization (Form 1) with the Commission. Form 1 must be paper filed with an original signature and so the Committee has not yet filed it. But these same communications trigger 24-hour independent expenditure reports by a political committee, 11 CFR § 104.4(f), which must be filed on Schedule E of Form 3X. Because of the amount of the expendiruros, however, the Comuittee is required to electronically file under 11 CFR $\S$ 104.18(a)(3)(B)(ii). Yet, because the Committee has not filed, and is not yet required to file its Form 1, it does not have and cannot abaiain an FEC ID number and electronic filing password within 24 hours. Therefore, although it is technically an "electronic filer," it is impossible for the

Federal Election Commission
December 23, 2011

## Page 2

Committee to file electronic reports. Furthermore, there is no provision for filing Schedule E through the FEC's online program.

In reliance upon a telephone conversation with Ms. Ashley Carter with the Reports Analysis Division on December 23, 2011, the Committee has decided to send a paper copy of its Form 1 and Schedules $E$ for the recent independent expenditures with original signatures by overnight courier to the FEC. The Committee initially intended and made all efforts for these to arrive on December 24, 2011, but this was impossible due to the restricted pickup operations of both mail and courier services around the Christmas holidays. Accordingly, Form 1 and Schedules E will be ovemighted on Tuesday, December 27, 2011. The Committee will then request an $\mathbb{D}$ number and password for electronic filing as soon as possible.

In addition, in reliance upon $11 \mathrm{CFR} \$ 100.20(\mathrm{~d})(3)$ and the instructions for Schedule E , the Committee is also faxing its Schedules E today, December 23, 2011. This should satisfy the regulations for permissible means of filing 24 -hour reports by a political committee. The Committee cannot be required to file electronically because it is impossible for it to do so because it cannot obtain a FEC ID number and password from the Commission within 24 hours. Therefore, the 24-hour reports for the independent expenditures made on December 22 and December 23 should be considered timely filed.

Please contact us if you have any questions. Thank you.
Sincerely,
The Bop Law Firm
Jame Bopper
James Bop, Jr.
Joseph A. Vanderhulst

(a) BUBTOTAL of Memized Independemt Expenditures $\qquad$ $-$
(D) Eustotal of Unitemized Independent Expenditures $\qquad$ -
(c) TOTAL Independem Expandumes $\qquad$

Under penalty of parjury I certhy that the independent expendinures repartad herein ware not made in cooparation, consultation, or cancert with, or at the request or suggestion of. any candidate or authorized commktee or agent of either, or (if the reporting entity is not a pothtical party commitue) any pollitical party committae or ifs agent


(a) sustotal of ltemized Independent Expenditures

- 14,392.25
(b) SUerotal of Unitemized Independent Expenditures $\qquad$ -
(c) TOTAL Independem Expenditures

14,392.25

Under penalty of perfury 1 certify that the independent expenditures reported herein were not made in cooperatton, sonsuhtaton, or concert with, or al the request or suggestion of, any candidate or authorized committes or agent of erther, or (if the reporting entity is not a polbical party committee) any political party commiteg or itegagent.


## Federal Election Commission ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS

The FEC added this page to the end of this filing to indicate how it was received.
Date of Receipt
Hand Delivered
Postmarked
USPS First Class Mail
Postmarked (R/C)
USPS Registered/Certified
Postmarked
USPS Priority Mail
Delivery Confirmation ${ }^{\text {TM }}$ Label $\square$
Postmarked

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Shipping Date
$\square$ Overnight Delivery Service (Specify):
Date of Receipt

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Received from House Records \& Registration Office
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