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NAME OF COMMITTEE (In Full)  
America Leads

FEC IDENTIFICATION NUMBER  
C00573055

Mailing Address PO Box 25944

City	State	ZIP Code
Alexandria	VA	22313

Mrs. Samantha Hay  
Campaign Finance Analyst  
Federal Election Commission  
999 E St, NW  
Washington, DC 20463

Ref: 2015 Year-End FEC Report (7/1/2015-12/31/2015)

Dear Mrs. Hay,

America Leads (FEC Committee ID: C00573055) is in receipt of your letter dated August 11, 2016. In response to your Request For Additional Information, please find below an explanation for each of the items listed in your letter.

Item 1. You note in your first enclosure that the same entries on the 48-Hr Notice report were disclosed on two 48 hr reports. In reconciling the 48 hr reports, it was determined that the entries listed in the enclosure on the 11/20/2015 48 hr report were inadvertently disclosed again on the 12/1/2015 48 hr report. The 2015 Year-End FEC report correctly discloses those entries.

Item 2. You note in your second enclosure that two independent expenditures that were first distributed on 10/29/2015 for \$161.12 and 10/30/2015 for \$224.66 were not filed timely. At the time of the filing of the 10/30/2015 48 hr report, the expenditure information was not available. Upon receiving this information, the PAC immediately included these entries with the next filed 48 hr report filed on 11/3/2016.

Item 3. In July, 2015, the PAC had originally received approval from our FEC analyst at the time to include the memo text language disclosed on the original Year-End FEC report. Based on our conversation, we have included additional memo text with the amended Year-End FEC report that includes the approximate spend per state. For the 2015 Year-End FEC report, for those independent expenditures that do not list a specific state and were allocated equally among the fifty states, the approximate spend per state was \$43,705.36.

Item 4. In our teleconference, you indicated that for several expenditures to the Prosper Group Corporation listed on Schedule E, the dates of payment for several of the entries listed on Schedule E were different than from the entries disclosed on the 48 Hour reports. During the reporting period, the PAC tracked daily the digital spend for the purposes of 48 Hour reporting. The actual payments to the vendor were made in several lump sum payments. In reconciling the vendor's daily reports to the actual payments, in some instances it was determined that the expenses had to be reallocated to other payments to more accurately align with the actual payments made to the vendor.

The Committee trusts that this response sufficiently responds to your request. Please do not hesitate to contact me directly at 703.299.8571 should you have any additional questions.

Sincerely,  
Timothy Koch  
Treasurer, America Leads