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January 5, 2014

Nicole Miller
Senior Campaign Finance Analyst
Federal Election Commission
999 E St., NW
Washington, DC 20463

Identification Number: C00488304

Reference: October Quarterly Report (7/1/14-9/30/14)

Dear Ms. Miller:

This letter is in response to your request for additional information dated December 1, 2014.

1. The above referenced report has been amended to force itemize the original contribution from Francis Neldon because FECFILE automatically placed the contribution in unitemized receipts. The chargeback to Gayle K. Ely was incorrectly reported. This was actually a chargeback to Hans Wilhemsen. The amended report reflects this correction.
2. As has been answered previously, the Committee is well aware of the regulations regarding expenditures made for the benefit of other federal committees-either through independent expenditures or in kind contributions. The Committee reported expenses for Printing and Telemarketing on line 21b because they were expenses related to fundraising for the American Legacy PAC. If they had been expenses for in kind contributions, they would have been itemized on Schedule B, Line 23. If they had been expenses for independent expenditures, they would have been itemized on Schedule E, Line 24. The Commission made it clear to Political Action Committees during the 2012 cycle that it was no longer required to put the word PAC in front of every expense to clarify it was a PAC expense-reporting these expenses on line 21b was sufficient. As the Committee indicated in its miscellaneous reports filed 8/29/14 and 12/1/14, it will continue to accurately report its disbursements.

Sincerely,

Mike Murray
Treasurer
