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FEC MAIL CENTER

November 14, 2014

Mr. Kevin Fortkiewicz  
Campaign Finance Analyst  
Reports Analyst Division  
Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

**Re: Response to Request for Additional Information Dated August 6, 2014**

Dear Mr. Fortkiewicz:

Bentley Systems, Incorporated Federal PAC, committee number C00408138 ("Bentley PAC") is hereby responding to a letter dated August 6, 2014 and signed by you, requesting additional information regarding two contributions made by Bentley PAC on May 14, 2014.

As representatives of Bentley PAC discussed with you via telephone on October 14, 2014 and October 20, 2014, Bentley PAC did not receive your letter and only became aware of the letter when a Bentley PAC representative checked the FEC website on October 14, 2014. Because Bentley PAC did not receive your letter and therefore did not have notice or the opportunity to respond to your letter by the due date indicated (September 10, 2014), it respectfully requests that the FEC does not take action against Bentley PAC for exceeding the response deadline. Please be aware that in order to ensure that future correspondence from the FEC is timely received by Bentley PAC, Bentley PAC will add [Maggie@arenastrategies.com](mailto:Maggie@arenastrategies.com) as a second recipient email address and will file a Form 99 to request a paper copy of correspondence, in addition to electronic copies.

As noted in your letter, Bentley PAC made the following two contributions on May 14, 2014 that caused the Bentley PAC to exceed the applicable federal contribution limits:

1. A \$5,000 contribution to Friends of Pat Toomey which caused Bentley PAC to exceed the applicable limit towards Senator Toomey's 2016 Primary election by \$5,000; and
2. A \$5,000 contribution to Bill Shuster for Congress which caused Bentley PAC to exceed the applicable limit to Representative Shuster's 2014 Primary election by \$1,000.

Bentley PAC inadvertently exceeded the applicable contribution limits without timely requesting re-designations of the contributions; as such, it has requested that Friends of Pat Toomey and Bill Shuster for Congress refund the excessive portions of Bentley PAC's contributions. Enclosed are copies of the refund requests from Bentley PAC to these two recipient committees. Bentley PAC will report the refunds on the FEC report(s) covering the time period during which they are received.

Please contact me if you have any questions or need additional information with respect to Bentley PAC's corrective actions in response to your letter dated August 6, 2014. Thank you.

11/14/2014 10:43:07 AM

Sincerely,

A handwritten signature in cursive script that reads "Darlene Foster". The signature is written in black ink and is positioned above the printed name.

Darlene Foster

Treasurer  
Bentley Systems, Incorporated Federal PAC

Enclosures

FROM: INT: ON: 1

November 12, 2014

Ms. Lisa Lisker  
Treasurer  
Friends of Pat Toomey  
228 S. Washington St., Suite 115  
Alexandria, VA 22314

**Re: Request for Refund of Contribution from Bentley Systems, Incorporated Federal PAC**

Dear Ms. Lisker:

Bentley Systems, Incorporated Federal PAC, committee number C00408138 ("Bentley PAC") made a \$5,000 contribution to the Friends of Pat Toomey via a check dated May 14, 2014.

Because this contribution caused the Bentley PAC to exceed the federal contribution limit towards Senator Toomey's 2016 Primary election by \$5,000, and the contribution was not properly re-designated to a different election, Bentley PAC hereby requests a refund of the contribution.

Please send the refund check to my attention, and contact me if you have any questions.

Thank you.

Sincerely,



Darlene Foster

Treasurer  
Bentley Systems Incorporated Federal PAC





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.

FORM 4470-10-1300

<input type="checkbox"/> Hand Delivered	Date of Receipt
<input type="checkbox"/> USPS First Class Mail	Postmarked
<input type="checkbox"/> USPS Registered/Certified	Postmarked (R/C)
<input type="checkbox"/> USPS Priority Mail	Postmarked
<input type="checkbox"/> USPS Priority Mail Express	Postmarked
<input type="checkbox"/> Postmark Illegible	
<input type="checkbox"/> No Postmark	
<input checked="" type="checkbox"/> Overnight Delivery Service (Specify): <i>UPS</i>	Shipping Date <i>11/17/14</i>
	Next Business Day Delivery <input checked="" type="checkbox"/>
<input type="checkbox"/> Received from House Records & Registration Office	Date of Receipt
<input type="checkbox"/> Received from Senate Public Records Office	Date of Receipt
<input type="checkbox"/> Received from Electronic Filing Office	Date of Receipt
<input type="checkbox"/> Other (Specify):	Date of Receipt or Postmarked
 PREPARER (8/2013)	<i>11/18/14</i> DATE PREPARED