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This responds to your May 23, 2014 letters regarding campaign reports filed by California Real Estate Political Action Committee/Federal (?CREPAC/Federal?) for the periods July 1 to December 31, 2013 and January 1 to March 31, 2014.

You requested clarifying information regarding reimbursements made by CREPAC/Federal to the Southland Regional Association of REALTORS, Beverly Hills/Greater Los Angeles Association of REALTORS, and other local REALTOR associations for ?apparent administrative expenses? that ?appear[] to be an in-kind contribution made on behalf of your committee.? On CREPAC/Federal?s campaign reports, these reimbursements were coded ?003? (solicitation and fundraising expenses) and described as reimbursements for fundraising events, fundraising expenses and meeting expenses.

All of the REALTOR associations that incurred expenses on behalf of CREPAC/Federal are local units of CREPAC/Federal?s connected organization, California Association of REALTORS, and all of the expenses were related to fundraising activities. The payments were not in-kind contributions to CREPAC/Federal.
