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November 23, 2011

Laura Sinram, Senior Campaign Finance Analyst
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Re: Amended July Monthly Report (6/1/2011- 6/30/2011), Received 8/18/2011

Dear Ms. Sinram:

The Commissions preliminary review of the report referenced above raised questions concerning certain information contained in the report. We have addressed the questions below and have disclosed any changes or clarifications in our amended July Monthly Report (see amendment filed 11/23/2011).

1. Schedule B supporting Line 30 (b) of the report discloses a payment(s) for postage for PAV mailing, graphics for PAV mailing and FEA 100% Federal: data for PAV mailing that does not refer to a clearly identified candidate for Federal office, does not promote, support, attack or oppose any such candidate for Federal office, and does not contain express advocacy.

2. The transfer(s)-in from the non-federal account for Administrative activity includes allocated expenses paid in the prior months (no more than 10 days before or 60 days after the payment to the vendor). These transfers for shared activity do not exceed the non-federal share of the joint disbursements.

The procedures for tracking and transferring from the non-federal account to the federal committee for administrative activities is maintained daily as payments are made for all activities paid out of the federal committee. A separate list is maintained for each bank account disclosing date of payment, check number, vendor name, address, category, ratio, and allocated amount to transfer. Transfers are made and supported with lists that may represent several bank accounts with different date ranges, but within the 60-day window. The date of the non-federal transfer is noted on list maintained by bank account and the list of joint disbursements is attached to the transfer document.

3. The administrative expenses for the utilities are included in our rent and the rent for the year 2011 was paid in full in October 2010.

4. Schedule H4 supporting Line 21(a) of the report discloses a payment(s) for dental insurance. This payment is administrative and the employees related to this expense spend less than 25% of their compensated time on Federal election activity or activities in connection with a Federal election.

5. Schedule H4 Payment to San Diego County Democratic Party Federal is for generic voter drive activities. We have amended the report to disclose category as Voter Drive expense on Schedule H4. See amendment filed 11/23/11.

6. Schedule H4 Payments to Daily Consulting Group and Presta, Lisa are administrative expenses for managing our donor files. These payments are not related to a fundraising event.

7. Schedule H4 of the report discloses a payment(s) for voter drive consulting services and postage, which are categorized as Voter Drive. These payment(s) are not conducted in connection with an election in which one or more candidates for Federal office appear on the ballot.

8. Schedule H4 of the report discloses payment(s) to an individual(s): Roger Bergmann for rent (includes utilities) and Jerry Drobkin for rent and deposit (includes utilities). See amendment filed on 11/23/11.

10. Schedule L-A of the report discloses a total of \$133,936.50 in receipts(s) from Democratic State Central Comm of Calif. in which \$66,968.25 was mistakenly disclosed twice. The receipt(s) represents a reimbursement to correct the Levin transfer to federal made on 9/17/2010 for allocated expenses between federal and non-federal. Please see Amended 2010 October Monthly Report filed on June 9, 2011.

If you have any further questions, please contact me at (916) 442-5707.

Sincerely,

Katherine Moret
Treasurer
