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June 7, 2013

David Butler
Senior Campaign Finance Analyst
Reports Analysis Division

Re: 12 DAY PRE-GENERAL REPORT (10/01/2012 - 10/17/2012)

This letter responds to your request for additional information dated May 3, 2013, regarding independent expenditures reported on Campaign for Working Family's ("CWF") 2012 Pre-General Report.

CWF has records of preparing a 48-hour independent expenditure report in FECFile for the two October 17 expenditures listed in your letter, and at that time, CWF believed that the report was filed. However, due to either a technical error in FECFile or an inadvertent error by CWF, the 48-hour report was not filed. CWF had contacted the FECFile support staff earlier in 2012 related to a corrupted FECFile database, and these issues persisted through 2012. CWF suspects that this technical issue may have contributed to the draft report not being filed, but cannot confirm that this is the case.

Drawing from the information contained on the draft 48-hour independent expenditure report in FECFile, the two expenditures were properly disclosed on CWF's 12-day Pre-General Report filed on October 25, 2012. Therefore, the two expenditures were disclosed six days after the 48-hour independent expenditure report was due, and prior to the general election.

Respectfully submitted,

Dorie Velezis
Treasurer, Campaign for Working Families
