

Dear Mr. Matheson,

I am writing in response to your February 10, 2011, letter regarding two separate issues in connection with the Cantor for Congress 30 Day Post-General Report (10/14/2010 - 11/22/2010).

First, your letter suggests that Cantor for Congress did not disclose the original contributions that were reported as refunded to an individual on the last page of the 30 Day Post-General Report. Please note that Cantor for Congress disclosed a 6/22/09 receipt of \$2,400 from this individual on page 76 of the 2009 July Quarterly Report and a 6/7/2010 receipt of \$2,400 from this individual on page 17 of the 2010 July Quarterly Report. Accordingly, the original contributions that were disclosed as refunded on the 30 Day Post-General Report were properly reported.

Second, your letter indicates that itemized disbursements to federal candidate committees must include certain information and that address information for the federal candidate committees is missing. However, the itemized disbursements to which your letter refers were for in-kind contributions. The Commission's Campaign Guides for Nonconnected Committees (page 66) and Corporations and Labor Organizations (page 61) both state that the address disclosed when itemizing an in-kind contribution must be the address of the third-party that received the payment for the the in-kind contribution, not the address of the benefiting candidate committee. The disbursements to federal candidate committees referred to in your letter were all for in-kind contributions and all disclosed the addresses of the third-parties that received the payments for the in-kind contributions. Accordingly, these disbursements were disclosed consistent with available Commission guidance (the Commission's Campaign Guide for Congressional Candidates and Candidates does not address in-kind contributions to federal candidate committees).

I trust this adequately responds to your letter.

Sincerely,  
Cindy Wharton - Finance Director

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