

This Miscellaneous Report to the FEC is in response to the letter dated 11/16/10 regarding the Amended April Monthly Report covering periods 3/1/10-3/31/10.

In regards to the Missing 48 Hour Notice referring to the Florida primary Senate race, CFG PAC did not believe a 48 hour report was required at the time as the PAC did not accumulate \$10,000 in un-reported Independent Expenditures at this time. On page 65 of the FEC Guide for Corporations, it reads, " expenditures that have already been disclosed in a previous report do not have to be included on the 48-Hour report. The SSF must report a last-minute expenditure a second time on a Schedule E filed with its next regular report. 104.4(a). Electronic filers must file these reports electronically. Paper filers mail file by fax or email. Additionally, electronic filers and paper filers may file 48-hour reports using the FEC web site's online program. 104.4(b)(2), 109.10(c) and 100.19(d)(3)."

It was our understanding that since previous expenditures towards this race were already reported on the March Monthly Report, covering 2/1/10-2/28/10, they did not apply to the \$10,000 threshold. You have now informed us that we have misunderstood the rule and have asked that we file 48 hour reports which include activities previously reported and are doing so at your request. CFG PAC will take appropriate steps to ensure this does not happen again in the future.

In regards to the Late 48 Hour Notice concerning the independent expenditures made on 4/16/10 in support of Jeff Duncan: A clerical error caused CFG PAC to believe the previous expenditures made during March 2010 were already reported to the FEC. This was incorrect. Although the expenditures made in March were added to the FECFile software prior to the 4/16/10 expenditures, the April Monthly Report was not actually uploaded until 4/20/10. Thus, the March transactions were not reported to the FEC before the 4/16/10 expenditures were made, as we mistakenly believed they had, causing the PAC to surpass the \$10,000 threshold. CFG PAC did, however, include the expenditures listed in your letter in a 48 Hour Report, uploaded on 5/14/10. CFG PAC had calculated that this was the first time un-reported Independent Expenditures surpassed the \$10,000 threshold. New practices are being developed to avoid this type of error in the future.

\*\*\*\*\*