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May 20, 2013

Ms. Maureen Benitz  
Senior Campaign Finance & Reviewing Analyst  
Reports Analyst Division  
Federal Election Commission  
Washington, D.C. 20463

RE: October Monthly Report (9/01/2012 - 9/30/2012)

Dear Ms. Benitz:

The following is my response to your letter dated April 9, 2013 requesting additional information regarding the report referenced above:

1. After further review of the Schedule H4 payment "Absentee Ballot Chase Mailer", it was determined that this payment did meet the definition of a Federal Election Activity and should have been disclosed on Schedule B, Line 30(b). Accordingly, nonfederal funds in the amount of \$21,388.90 should not have been transferred to the federal account for this payment and must be returned to the nonfederal account. In the current period, the federal account will report a debt liability of \$21,388.90 to the nonfederal account to be repaid as soon as possible. The liability balance in the federal account will be reported on the Committee's mid-year report for 2013. I will also prepare an amended October 2012 Monthly Report as well as amended reports for the subsequent 2012 periods, which will be filed as soon as possible.
2. The Schedule H4 payment for "Consulting Services" in the amount of \$1,872.39 was paid to an independent contractor, not an employee of the Committee. The Committee has no employees.

Thank you for your assistance. Please let me know if additional information is required.

Sincerely,

Joel Knopp,  
Treasurer, Orange County Republican Executive Committee