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May 16, 2012

Ms. Alexandra T. Broomhead  
Campaign Finance Analyst  
Reports Analysis Division  
Federal Election Commission  
999 E Street NW  
Washington, DC 20463

Dear Ms. Broomhead:

Country First PAC (FEC ID# C00457705) is in receipt of your Request for Additional Information dated May 11, 2012 regarding the Committee's 2012 January Report.

Concerning the \$2,932 activity identified as a line 16 Refund of a Contribution Received from Mitt Romney for President which you state had no original contribution that was reported by us.

Please note that on that same report there was a memo entry In-Kind contribution to Mitt Romney for President for \$5000 related to an air charter paid by Country First PAC on behalf of Mitt Romney for President using CSI Aviation.

The \$2,932 that was paid to us by Mitt Romney for President was the balance of that air charter payment that Country First PAC incurred to CSI Aviation.

We will reclassify this \$2,932 reimbursement as a line 15 Offset to Expenditure instead of a line 16 Refund of Contributions Made to Federal Committee and amend the corresponding cover pages for the subsequent reports to reflect the changes to Column B.

If you have questions or need further information regarding this response, please contact me at 202-498-5258.

Sincerely,

Keith A. Davis, Treasurer  
Country First PAC

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