

September 2, 2011

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 August 29, 2011, regarding the Committee's 2011 March Monthly Report.

Concerning the \$2,948,598 activity identified as a memo entry. "TRANSFER OF EXCESS FUNDS/-ASSETS-MAILING". Please note this is an in-kind donation for the cumulative value of all lists transferred from an affiliated PAC, Patriot First PAC (FEC ID C00341891) which has now been terminated with the FEC. This transfer memo transaction was also disclosed on the Patriot First PAC termination report (page 6) filed on 5/18/11, a termination report which was accepted and approved by the Commission.

If you have questions or need further information regarding this response, please contact me at 703-549-7705

Sincerely,

Keith A. Davis, Treasurer
Country First PAC
