MISCELLANEOUS TEXT (FEC Form 99)

May 28, 2012

Ms. Ashley Carter
Reports Analysis Division
Federal Election Commission

BY ELECTRONIC SUBMISSION

Report Identification Number: C00386300
Reference: Amended 12 Day Pre-general Report (10/01/10 - 10/13/10)

Dear Ms. Carter,

This submission is in response to your review of the above referenced report and amendments to prior reports as listed in the attachment to your letter of April 4, 2012.

In December 2010 the Committee's financial disclosure reports were amended to correct omissions in prior reports beginning in 2007. Prior to June 2009 the Committee's previous administrative aide was responsible for the committee's bookkeeping activities and supervised the preparation of the FEC reports. This aide was the only person who saw both the Committee's books and the reports, and it is unclear whether he reconciled the reports to the books. In June 2009 the administrative aide's relationship with the Committee ended. Committee staff has not been in contact with him since that time. In March 2010 the Committee staff became aware of a discrepancy between the Committees' bank account balances and the FEC reports.

The Committee staff immediately contacted the FEC's Reports Analysis Division to notify them of the discrepancy and seek guidance. The Analyst advised Committee staff to reconcile the financial activity and to amend prior reports to correct misstatements.

Committee staff initiated an internal investigation and hired an experienced FEC campaign finance consultant to audit the books, reconcile the reports, and prepare complete and correct amended reports. The audit determined that some contributions and disbursements had not been entered correctly into the Committee's FEC reporting software. Updated reports for the years 2007 - 2010 were filed with the Commission in December 2010.

The Committee has instituted new financial procedures to ensure that there are sufficient internal and external controls to ensure that the Committee's finances are managed appropriately and that the FEC reports are reconciled to the Committee's books. The Committee staff now reconciles the books monthly using accounting and FEC reporting software. The FEC compliance consultant reviews the reconciliation monthly and the FEC reports each quarter.

Please contact me with any questions you may have about this matter.

Sincerely,

William L. Drake
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