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December 31, 2012

Ms. Caroline DeBerry
Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, D.C. 20463

IDENTIFICATION NUMBER: C00506170

REFERENCE: OCTOBER QUARTERLY REPORT (08/18/2012?09/30/2012)

Dear Ms. DeBerry,

This statement is in response to the Commission's letter dated November 30, 2012. The Commission requested additional information on four items.

First, the Commission requested clarification on contributions that appear to exceed federal limits. Any amount over the federal contribution limits has been reattributed within 60 days or refunded. These refunds and reattributions will be reflected on subsequent reports. Some of the contributions from individuals were incorrectly designated. The correct designations will be reflected on amended reports.

Second, the Commission requested clarification on contributions that appear to have been received after the primary election. These contributions have either been refunded or incorrectly designated. Refunds will be reflected in a subsequent report and correct designations will be reflected on an amended report.

Third, with respect to the non-federal committees listed, our Committee has safeguards in place to ensure that these committees used permissible funds for the contributions.

Fourth, the Commission requested clarification for the following purpose description: "Campaign Promotional Items." Clarification has been provided in an amended report.

This should answer the Commission's inquiry.

Sincerely,

Brian M. Cresta
Treasurer
