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Friends of John Boehner
7908 Cincinnati Dayton Road
Suite I
West Chester, OH 45069

May 9, 2013

Mr. Chris Jones
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Dear Mr. Jones:

In response to your telephone call on May 1, 2013 and to provide further clarification related to potentially excessive contributions received by the Friends of John Boehner in 2011/2012, the committee's response is below.

July 2011 Quarterly Report, Schedule A:

The Committee has again researched each of the items identified in your September 16, 2011 letter. We have identified 2 items that had required additional attention which we note below. However, we also note that our response filed on October 21, 2011 appears to have been cut off after Frederick Klingenstein and that some individuals prior to Mr. Klingenstein on your list had not been previously identified. Please note that each entry had one of three potential dispositions prior to your call: 1) refunds were issued to each individual that did have an excessive contribution; 2) funds that had been transferred from a joint fundraising committee which triggered excessive contributions were refunded to the joint fundraising committee and removed from the report; or 3) permissible redesignations done in accordance with FEC regulations and the joint fundraising notices to contributors were noted on subsequent amendments. Despite our best efforts to correct each issue, as noted above, 3 items remain from that letter.

1. John Schiff - A review of these records shows that the contributions were actually from John Schiff, Jr. and John Schiff, III. As such the committee will amend the relevant report(s) to clarify the name of the contributor.
2. Richard M. Whiting - the committee has issued a \$2,300 refund which will be reported on the next regularly scheduled public disclosure report.

October 2011 Quarterly Report, Schedule A:

Similarly to the items identified on the September 16, 2011 letter, regardless of whether the individuals or PACS were specifically mentioned in our response, each entry had one of three potential dispositions prior to your call: 1) refunds were issued to each individual that did have an excessive contribution; 2) funds that had been transferred from a joint fundraising committee which triggered excessive contributions were refunded to the joint fundraising committee and removed from the report; or 3) permissible redesignations done in accordance with FEC regulations and the joint fundraising notices to contributors were noted on subsequent amendments. Despite our best efforts to correct each issue, as noted above, 2 items remain from that letter. Again, however, we did identify a few items that merited additional attention.

1. Bob R. Brooks - the committee has issued a \$1000 refund which will be reported on the next regularly scheduled public disclosure report.

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- 2. Violet Hanna - the committee has issued a refund \$ 500 refund and which will be reported on the next regularly scheduled public disclosure report.
- 3. John Haddon - the committee has issued a \$40 refund which will be reported on the next regularly scheduled public disclosure report.
- 4. Carmen McReynolds - the committee will refund \$2,000 and which will be reported on the next regularly scheduled public disclosure report.
- 5. Michael Morris - the committee has issued a \$3,500 refund which will be reported on the next regularly scheduled public disclosure report.
- 6. Fred Rowan - the committee has issued a \$500 refund which will be reported on the next regularly scheduled public disclosure report.
- 7. Loren Schramm - the committee has issued a \$1,000 refund which will be reported on the next regularly scheduled public disclosure report.

Amended Pre-Primary 2012 Quarterly Report, Schedule A:

As with the above noted reports, the Committee previously disposed on many of the items reflected on the letters in subsequent amendments or reports. Nonetheless, we note the following:

- 1. Barry F. Bucher - the committee will amend the report to show the proper election designation.
- 2. James and James F. Dicke - In addition to a refund already reported to Mr. Dicke, a review of the records shows that some of the contributions were made from James F. Dicke Jr. and James F. Dicke III. The report is being amended to reflect this change.
- 3. Daniel French - the committee has issued a \$1,000 refund which will be reported on the next regularly scheduled public disclosure report.
- 4. Ray P. Oden - the committee has issued a \$500 refund which will be reported on the next regularly scheduled public disclosure report. An additional refund was previously reported on 6/21/12.
- 5. John H. Schwan - the committee has issued a \$600 refund which will be reported on the next regularly scheduled public disclosure report.

April 2012 Quarterly Report, Schedule A:

As with the above noted reports, the Committee previously disposed on many of the items reflected on the letters in subsequent amendments or reports. Nonetheless, we note the following:

- 1. John Schwan - the committee will refund \$600 and report the disbursement on the next regularly scheduled public disclosure report.
- 2. Thomas V. McKernan - the committee has issued a \$2,500 refund which will be reported on the next regularly scheduled public disclosure report.
- 3. Lawrence Schumacher - the committee has issued a \$500 refund which will be reported on the next regularly scheduled

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public disclosure report.

Because the below receipts came in through a joint fundraising committee, the committee should have reported each of the contributions identified below as designated toward the general election in the first instance. The committee will amend the report to show the proper election designations. This has already been done for some other PACs listed in your initial letter and refunds issued when appropriate.

- CSX Corporation Good Government Fund,
- EMD Serono Inc., PAC
- Ice Cream, Milk & Cheese PAC
- TE Connectivity, Inc. PAC
- MFA PAC

With respect to MFA PAC, in addition to the redesignation, the committee has issued a \$5,000 refund to the committee which will be reported on the next regularly scheduled public disclosure report.

All other potentially excessive donations were responded to in the Committee's letter filed 3/29/12. Any additional edits will be disclosed on the amendment being filed with this letter.

Finally, by way of explanation, during 2011, the Committee recognized that its data base vendor was being overloaded by the volume of contributions. Many of the RFAs received in early 2011 were the result of donors who had contributed through a joint fundraising committee and not directly to the Committee. Thus, the committee transitioned to a new filing software and processing system vendor in October 2011. This system allows for closer monitoring of all receipts, as well as provides several quality assurance reports to track duplicate entries and excessive contributions. In addition, the current vendor now reviews all donor allocations prior to any distribution from a joint committee to ensure that excessive contributions are not accepted. However, as with any transition from a prior database to a new database, the committee had to work out the kinks in the data transition. This was not a simple process and resulted in some of the issues questioned in the Commissions letters. Please note that data issues from the previous cycle do not affect our current reporting and vetting.

The Committee now de-dupes and performs reviews of the data weekly to identify any excessive contributions that may have been missed during the initial processing. Once excessive contributions are identified, the Committee takes steps to either reattribute, redesignate or refund if necessary. For presumptive reattributions and redesignations, the Committee notifies the contributors in writing within 60 days of receipt and gives the contributor the opportunity to change this designation or request a refund as required by the Commission regulations. For excessive contributions that cannot be presumptively reattributed or redesignated, the excessive portion of the contribution is refunded within 60 days of receipt of the original contribution, with most being issued within the same reporting period.

In addition, we have asked our database vendor to review the files to make sure it has de-duped the records. We have also asked that they retrain their staff to properly input contribution data in the first instance. For example, several of the items you identified relate to multiple people in a single family having the same name, but not being identified as Jr., or III on the reports. We are also reviewing our processes to ensure that we are taking every step to avoid these issues in the future.

Should we have missed any items about which you had a question or if you require additional information, please do not hesitate to contact me at (703) 281-7540.

Sincerely,

Lisa Lisker, Treasurer