

MISCELLANEOUS TEXT (FEC Form 99)

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NAME OF COMMITTEE (In Full)
CLUB FOR CONSERVATIVES

FEC IDENTIFICATION NUMBER

C00658302

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City	State	ZIP Code
CHARLOTTESVILLE	VA	22902

RESPONSE TO RFAI DATED 10 OCTOBER 2018

Club For Conservatives (hereinafter sometimes "the Committee")

14November 2018

(1) The contributions to the five candidates identified in the RFAI were in fact miscoded as PRIMARY contributions rather than as GENERAL election contributions. The subject Quarterly Report has now been amended to reflect the coding as "General Election." All such payments were within the lawful limits allotted to the Committee. The Committee regrets the miscoding and thanks the Commission for calling attention to the matter for clarification.

(2) The RFAI states that the Committee filed 48-hour reports listing Daniel Crenshaw as payee, and suggests possible inconsistencies in dates or amounts between the 48-hour IE reports and the later listing of those expenditures in the Quarterly Report at issue.

The Committee was not able to locate any IE reports listing Daniel Crenshaw as payee, and in fact made no IE payments to Mr. Crenshaw. Mr. Crenshaw was actually the candidate on whose behalf the expenditures were made. The Committee will follow up with its assigned analyst to determine what may have been intended by this reference in the RFAI.

The Committee did identify one or more entries where the DATES of either the dissemination or the date of obligation differed by a single day between the 48-hour Report and the Quarterly Report, and revised the Quarterly Report to reflect the accurate dates.

(NOTE: The Committee does presently have lingering questions regarding the proper date for listing obligation and dissemination dates for "rolling IEs" that occur over time, and that eventually cross the cost threshold for 48-hour reporting, but do so by accruing costs incrementally. We do not see that issue addressed in the FEC literature, nor does the FECFile software seem to contemplate such expenditures [such as Google or Facebook ads that accrue expense in

accordance with the number of persons viewing them]. The Committee will address this issue with the Commission experts in preparation for the filing of future reports.)

Regarding disparate payment amounts, the Committee reported \$6,155.66 owed to Facebook and \$350 owed to Google based on

the initial email reports sent by those vendors to us, respectively at the time at which we were required to file the 48-hour IE reports. This was the best information available to us at the time. What they actually charged and we ultimately paid was slightly different, and the Committee reported the ACTUAL numbers on the Quarterly Report: \$6,075.00 to Facebook and \$720 to Google. We have tried without success to amend the 48-hour report to match the Quarterly Report exactly. The "Amend" option on our FECFile is not functioning properly, and we are contacting the FEC Tech Division in an attempt to resolve the issue. It is our intention to Amend the 48-hour reports to reflect the actual eventual payments, and will notify the Commission when that has been accomplished.

PLEASE NOTE that the Quarterly Report amounts and payees are CORRECT as they stand in the Amended Quarterly Report.

The Committee stands ready to supply any additional information available to it if this Response does not answer all of the Commission's questions.

Nathanael Pendley, Asst. Treasurer