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NAME OF COMMITTEE (In Full)
Working America Coalition

FEC IDENTIFICATION NUMBER
C00620583

Mailing Address 815 16th Street, NW

City	State	ZIP Code
Washington	DC	20006

I am responding to your letter dated June 13, 2017, regarding the Amended 12 Day Pre-General Report filed by Working America Coalition (the "Committee") on January 31, 2017 (hereinafter, the "January Amended Pre-General Report").

With respect to the first item in your letter, the Committee is filing an additional amended Pre-General Report (hereinafter, the "Current Amended Pre-General Report") along with this response. The Current Amended Pre-General report corrects the figures reported previously in Column B, to reflect corrections made to discrepancies found in further reconciliation of the activity during the third quarter of 2016 and the period covered by the Pre-General report.

With respect to the second item in your letter, the Current Amended Pre-General Report corrects the Committee's inadvertent errors with respect to reporting in-kind contributions received on both Schedule A and Schedule B.

With respect to the third item in your letter, the Current Amended Pre-General Report changes the purpose descriptions you note as inadequate and provides additional detail.

With respect to the fourth item in your letter, the Committee erred in reporting a total of \$24,304.47 in disbursements for non-federal campaign activity as memo items, believing it was required to show such items as debt owed to the vendors. The Committee understands it was in error by so disclosing, and has removed the memo items from Schedule B detail supporting Line 29 in the Current Amended Pre-General Report.

With respect to items five through seven in your letter, the Committee believes it will provide greater clarity to address in turn each candidate supported or opposed by the independent expenditures at issue.

Concerning the independent expenditures supporting Florida Senate candidate Patrick Murphy and opposing Florida Senate candidate Marco Rubio, the Committee acknowledges that it failed to file 48-Hour Reports disclosing spending that occurred beginning on October 1, 2016, through and including October 19, 2016. As noted in its response to the Request for Additional Information concerning its October Quarterly Report, the Committee crossed the \$10,000 threshold for reporting of independent expenditure spending in the Florida Senate race on October 19, 2016, the twentieth day prior to the election. The Committee should have filed a final 48-Hour Report disclosing activity in the U.S. Senate race in Florida on or before October 21, 2016. The Committee regrets this oversight and notes that all the activity in question here was disclosed prior to the election and, moreover, that the Committee's support for Patrick Murphy was previously made known to the public when it filed its 48-Hour Report on July 27, 2016.

Concerning the independent expenditures related to the U.S. Senate election in Nevada, the Committee responds as follows:

Certain transactions were erroneously reported as independent expenditures on the 48-Hour Report filed on October 9, 2016, but additional reconciliation that the Committee undertook prior to filing its January Amended Pre-General Report revealed that the transactions should not have been listed on the 48-Hour Report. These transactions are as follows: \$780 to Mosaic, supporting Cortez-Masto, dissemination date 10/5/16, transaction ID D601197; \$120 to Mosaic, supporting Cortez-Masto, dissemination date 10/6/16, transaction ID D601311; \$240 to Mosaic, supporting Cortez-Masto, dissemination date 10/6/16, transaction ID D601315; \$120 to Mosaic, supporting Cortez-Masto, dissemination date 10/13/16, transaction ID D602363. (Based upon staff recollection and review of contemporaneous records, the Committee believes these transactions were initially coded as associated with federal candidates when, in fact, they were for public communications associated with non-federal candidates.)

In some cases, records for independent expenditures in the same election, disseminated

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on the same date, and paid to the same vendor were combined on 48-Hour Reports into one transaction, but appear split into multiple transactions on the January Amended Pre-General Report. Matching the disclosed transactions is complicated in some cases by a software error discovered in the beginning of October 2016. This error caused the date that should have appeared in the "Date of Dissemination?" field for independent expenditures to appear on some 48-Hour Reports as the "Date of Disbursement or Obligation." This software error was corrected in early October and the actual dates on which the reported independent expenditures were disseminated were reported beginning with the January Amended October Quarterly Report and for subsequent reports filed by the Committee. Additionally, the Committee discovered that some independent expenditures that should have been disclosed as opposing Nevada Senate candidate Joe Heck were erroneously combined with independent expenditures supporting Nevada Senate candidate Catherine Cortez-Matso. In order to provide sufficient clarification to you, the Committee submits the following detailed explanations:

Four transactions that appeared on the January Amended Pre-General Report ? each for \$360 to Mosaic, with dissemination dates of 10/5/16, two in opposition to Joe Heck and two in support of Catherine Cortez-Masto, with transaction ID numbers D612158, D612159, D612160, and D612161 ? were reported on a 48-Hour Report filed October 9, 2016, as combined into one record, for \$1440 to Mosaic in support of Cortez-Masto with a dissemination date of 10/5/16 and transaction ID number D601188. The Committee acknowledges that \$720 of the combined record should have been reported as opposing Joe Heck and regrets the error.

Two transactions that appeared on the January Amended Pre-General Report ? each for \$360 to Mosaic, with dissemination dates of 10/7/16, one in opposition to Joe Heck and one in support of Catherine Cortez-Masto, with transaction ID numbers D612163 and D612164 ? were reported on a 48-Hour Report filed on October 9, 2016, but erroneously combined into one record, for \$720 to Mosaic in support of Cortez-Masto with a dissemination date of 10/7/16 and transaction ID number D601418. The Committee acknowledges that \$360 of the combined record should have been reported as opposing Joe Heck and regrets the error.

Four transactions that appeared on the January Amended Pre-General Report ? each for \$630 to Mosaic, with dissemination dates of 10/8/16, two in opposition to Joe Heck and two in support of Catherine Cortez-Masto, with transaction ID numbers D612167, D612168, D612169, and D612170 ? were reported on a 48-Hour Report filed October 9, 2016, as combined into one record, for \$2,520 to Mosaic in support of Cortez-Masto with a dissemination date of 10/8/16 and transaction ID number D601548. The Committee acknowledges that \$1,260 of the combined record should have been reported as opposing Joe Heck and regrets the error.

Two transactions that appeared on the January Amended Pre-General Report ? each for \$31.50 to Mosaic, with dissemination dates of 10/10/16, one in opposition to Joe Heck and one in support of Catherine Cortez-Masto, with transaction ID numbers D612173 and D612174 ? were reported on a 48-Hour Report filed on October 9, 2016, but erroneously combined into one record, for \$63 to Mosaic in support of Cortez-Masto with a dissemination date of 10/10/16 and transaction ID number D601785. The Committee acknowledges that \$31.50 of the combined record should have been reported as opposing Joe Heck and regrets the error.

Two transactions that appeared on the January Amended Pre-General Report ? each for \$450 to Mosaic, with dissemination dates of 10/10/16, one in opposition to Joe Heck and one in support of Catherine Cortez-Masto, with transaction ID numbers D612165 and D612166 ? were reported on a 48-Hour Report filed on October 9, 2016,

A-G79 @C5 B9CI G'H9LH'fl 97 : cfa ' - - L

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but erroneously combined into one record, for \$900 to Mosaic in support of Cortez-Masto with a dissemination date of 10/10/16 and transaction ID number D601787. The Committee acknowledges that \$450 of the combined record should have been reported as opposing Joe Heck and regrets the error.

There are four transactions that the Committee disclosed on 48-Hour Reports filed on October 9, 2016, but erroneously re-reported with the same amounts, dates of dissemination, and transaction ID numbers on the 48-Hour Report it filed on October 21, 2016. The duplicate reporting occurred with respect to the following transactions: \$780 to Mosaic, supporting Cortez-Masto, disseminated 10/5/16, transaction ID D601197; \$240 to Mosaic, supporting Cortez-Masto, disseminated 10/6/16, transaction ID D601315; \$720 to Mosaic, supporting Cortez-Masto, disseminated 10/7/16, transaction ID D601418; \$2520 to Mosaic, supporting Cortez-Masto, disseminated 10/8/16, transaction ID D601548.

Finally, you note a transaction reported on the January Amended Pre-General Report disclosing \$4,250 paid to Petel & Co. in opposition to Joe Heck, disseminated on 10/19/16. Your letter indicates that this transaction was not disclosed on a 48-Hour Report; however, the Committee disclosed this transaction on its 48-Hour Report filed on October 21, 2016, as evidenced by the matching transaction ID numbers.

We note that despite these errors in attribution of some independent expenditures in the Nevada Senate race, the public was contemporaneously well-informed by the Committee's other disclosures that it was making independent expenditures to support Catherine Cortez-Masto and to oppose Joe Heck in that election.

Concerning the \$5,400.00 independent expenditure in support of Ohio Senate candidate Ted Strickland disseminated on 10/10/16 that your letter indicates was not timely disclosed, the Committee disputes the characterization of the disclosure as late. The Committee disclosed two expenditures in connection with the Ohio Senate election on 48-Hour Reports filed on July 27, 2016. After that disclosure, the Committee's next independent expenditure activity in the Ohio Senate election was disseminated on 10/10/16. The Committee crossed the \$10,000 threshold for filing its next 48-Hour Report on 10/19/16 and timely filed a report disclosing all previously undisclosed independent expenditures in that election on October 21, 2016. It appears, however, that the independent expenditure your letter notes as late-filed, was disclosed on the October 21 48-Hour Report as a combined record, but split into five separate records ? all in support of Ted Strickland, all for payments to Mosaic and all disseminated on 10/5/16, and totaling \$5,400.00 ? on the January Amended Pre-General Report.

Finally, with respect to the presidential race, the Committee notes that issues similar to those described above in connection with the Nevada Senate race explain many of the discrepancies noted in your letter. The Committee submits the following detailed information:

Three transactions, all for independent expenditures disseminated on 10/14/16 in support of Hillary Clinton and all paid to Mosaic, were combined on the 48-Hour Report filed October 17, 2016, and reported as one transaction. The transaction numbers and amounts that appear on the January Amended Pre-General Report are: D612178, \$120; D612089, \$180; and D612093, \$480. The combined record on the 48-Hour Report was reported in the amount of \$720, with transaction ID D602473. The Committee acknowledges that the totaled amount disclosed on the 48-Hour Report should have been \$780 and regrets the error.

Two other transactions for independent expenditures disseminated on 10/15/16 in support of Hillary Clinton and paid to Mosaic were combined on the 48-Hour Report filed October 17, 2016. The transaction numbers and amounts that appear on the January Amended Pre-General Report are:

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D612189, \$30; and D612054, \$60. The combined record on the 48-Hour Report was reported in the amount of \$90 with transaction ID D602867.

Certain transactions that are noted in your letter as appearing on the January Amended Pre-General Report but not disclosed on timely-filed 48-Hour Reports were in fact timely disclosed on 48-Hour Reports. The following transactions for payments to Mosaic were disclosed (with the same transaction ID on the January Amended Pre-General Report as on the 48-Hour Report) on the 48-Hour Report filed on October 6, 2016: \$600 supporting Clinton, disseminated 10/1/16, transaction ID D600949; \$300 supporting Clinton, disseminated 10/3/16, transaction ID D601070; \$300 opposing Trump, disseminated 10/3/16, transaction ID D601068; \$240 supporting Clinton, disseminated 10/5/16, transaction ID D601195; \$240 opposing Donald Trump, disseminated 10/5/16, transaction ID D601194 (you also note this transaction as not appearing on the January Amended Pre-General Report, which it also does); \$120 supporting Clinton, disseminated 10/6/16, transaction ID D601313; \$120 opposing Trump, disseminated 10/6/16, transaction ID D601309; \$60 supporting Clinton, disseminated 10/8/16, transaction ID D601545.

Finally, the Committee acknowledges that certain independent expenditures concerning the presidential election ? that is, those transaction noted in your letter but not specifically addressed above ? were not timely disclosed on 48-Hour Reports. Combined with the independent expenditures the Committee acknowledges were not timely filed in other elections during the pre-general reporting period, the total amount of spending not timely disclosed was \$9,934.96, or less than five percent of the total independent expenditures the Committee disseminated during this time period. The Committee regrets the inadvertent omissions that resulted in its failure to disclose all of its independent expenditures in a timely manner and notes that it is currently undergoing an internal review of its data entry and reconciliation procedures to further reduce such errors in future elections.

And, despite these omissions, we note that the public was contemporaneously well-informed by the Committee?s other disclosures that it was making independent expenditures to support Hillary Clinton and to oppose Donald Trump in the presidential election.

Please do not hesitate to contact me if you have any additional questions.

Renata Strause
Counsel for Working America Coalition