

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

NAME OF COMMITTEE (In Full)
Security Is Strength PAC

FEC IDENTIFICATION NUMBER
C00573733

Mailing Address 51 Peninsula Drive

City	State	ZIP Code
Hilton Head Island	SC	29926

June 2, 2016

Kaitlyn Seufert
Sr. Campaign Finance & Reviewing Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, NW Washington, D.C. 20463

Re: Security Is Strength PAC ID No. C00573733 / Year-End Report (07/01/2015 - 12/31/2015)

Dear Ms. Seufert:

This correspondence follows up on your telephone conversation with a representative of Security Is Strength PAC (the "Committee") on June 2, 2016, regarding the Request for Additional Information sent to the Committee dated April 28, 2016.

Regarding the first item in your letter, which addresses the 48-hour reporting requirement in 11 CFR 104.4(b), as we previously explained in our Form 99s filed on October 1, 2015 (FEC-1026386) and October 5, 2015 (FEC-1026798), the Committee did not overlook any 48-hour reporting requirement. Rather, it was our understanding that 48-hour reports were only required to be filed in the applicable election year to which an independent expenditure relates, which in this case was 2016. As explained below, the Committee came to this understanding of the applicable regulation (11 CFR 104.4) based on the advice of counsel and upon the advice of three different employees of the FEC's Information Division, including a supervisor. On May 1, 2015, a representative of the Committee placed a call to the FEC's Information Division and spoke with a specialist. The specialist immediately and unequivocally confirmed that the "during the calendar year" language in 11 CFR 104.4 meant that the committee was only required to file 48-hour reports if it made independent expenditures in the calendar year of the applicable election (i.e., 2016). The specialist went on to note that even though some committees were filing 48-hour reports in 2015 for elections that will not be held until 2016, these committees were doing so gratuitously and were not required to file the reports. On June 4, 2015, the day after the Committee had disseminated its first independent expenditure, a representative of the Committee again placed a call to the FEC's Information Division and spoke with a different specialist, seeking to confirm the advice it had previously received. The specialist confirmed that under 11 CFR 104.4, no 48-hour reporting of independent expenditures related to 2016 elections was required in calendar year 2015. The specialist indicated that she wanted to confirm the accuracy of her advice with her supervisor, and placed the Committee's representative on hold. When she resumed the call, she informed the Committee's representative that the supervisor had confirmed that her advice was correct. Both of these calls were documented by the Committee's representative in notes prepared during and immediately after the call.

On September 29, 2015, the Committee received a letter dated September 17, 2015, requesting additional information concerning the Committee's mid-year report. The letter stated that the Committee may have failed to file one or more required 48-hour reports disclosing an independent expenditure disseminated on June 3, 2015 (as reported on Schedule E). Because the letter conflicted with the Committee's interpretation of 11 CFR 104.4 and the prior advice it had received from FEC staff, the Committee immediately contacted you to discuss this issue, and you indicated that the 48-hour reports needed to be filed. You also kindly expressed regret for the conflicting advice we had received from other FEC staff members. As you indicated, the Committee should have contacted you directly, and in hindsight we agree with that advice, and will heed it in the future. Although the Committee reached a different conclusion based on our interpretation of the 48-hour reporting requirements, the Committee's foremost goal is to be transparent in its activities. Indeed, the Committee publicized the communications at issue, demonstrating that the Committee had no intention to hide the expenditures. To the contrary,

A-G79 @B9CI G'H9LH'fl 97 : cfa ' - - t

NAME OF COMMITTEE (In Full)
Security Is Strength PAC

FEC IDENTIFICATION NUMBER
C00573733

Mailing Address 51 Peninsula Drive

City	State	ZIP Code
Hilton Head Island	SC	29926

it wanted the public to be fully aware of them.

Since receiving the first RFAI in September 2015, the Committee immediately filed all past due reports, and since then has timely filed numerous 48-hr. and 24-hr. reports.

Additionally, please note that the Committee was referred by the Reports and Analysis Division to the FEC's Alternative Dispute Resolution Office in connection with the above reporting issues. After Committee representatives participated in a telephone conference with Lynn Fraser, the Director of the Alternative Dispute Resolution Office, Ms. Fraser informed Committee representatives by email that "in researching a bit more on this matter it was determined that the case would be closed with no further action. I'm sure this will be good news to your client."

Regarding the second item in your letter, the Committee filed an amended Year-End Report today to clarify the in-kind contribution issue.

We offer the above explanation in hopes that the FEC will take these circumstances into consideration when evaluating the year-end report.

If you have any questions or need any additional information, please do not hesitate to contact me.

Thank you.

Sincerely,

William L. Bethea, Jr.
Treasurer