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September 10, 2015

Laura Beaufort
Senior Campaign Finance Analyst
Federal Election Commission
Washington, DC 20463

ID Number: C00458844

Reference: July Quarterly Report (4/1/15-6/30/15)

Dear Ms. Beaufort:

This letter is in response to your request for additional information, dated August 6, 2015.

1. Your letter indicates that the Committee disclosed one or more contributions that appear to exceed the limits set forth in the act. The Committee is aware of the contribution limits. In the case of an individual, if the contribution cannot be presumptively reattributed to a spouse or redesignated to a subsequent election, the Committee either sends a verified reattribution letter or refunds the excessive portion within 60 days of receipt. The Committee sends all presumptive reattribution and redesignation letters within 30 days of receipt and always gives the donor the option of making a change or requesting a refund. When the Committee receives contributions from other political committees that cause an excessive total, the Committee contacts the other political committee and requests a verified redesignation. If this is not received, the Committee issues a refund. The following is a response to each contributor listed in your letter:

- Richard Andrascik: A refund in the amount of \$1514 was issued on 7/1/15. This will be disclosed on the October Quarterly Report.
- R.F. Barker: Excessive portion was redesignated to the 2016 General. This will be disclosed on the October Quarterly Report.
- Julie L. Berry: Excessive portion was reattributed to her spouse. This will be disclosed on the October Quarterly Report.
- W.H. Best: Excess portion was reattributed to his spouse and redesignated to the 2016 General. This will be disclosed on the October Quarterly Report.
- Bill Bowles: A refund in the amount of \$3840 was issued on 8/25/15. This will be disclosed on the October Quarterly Report.
- Michael Callum: Excess portion was reattributed to his spouse and redesignated to the 2016 General. This will be disclosed on the October Quarterly Report.
- Carlyle Anne Carr: Excessive portion was redesignated to the 2016 General. This will be disclosed on the October Quarterly Report.
- Thomas R. Church: Excessive portion was redesignated to the 2016 General. This will be disclosed on the October Quarterly Report.
- Mrs. William H. Clark III: A refund in the amount of \$4000 was issued on 7/10/15. This will be disclosed on the October Quarterly Report.
- Mercy B. Cordero: A refund in the amount of \$3740 was issued on 8/29/15. This will be disclosed on the October Quarterly Report.
- Ralph Delatorre: A refund in the amount of \$5400 was issued on 8/29/15. This will be disclosed on the October Quarterly Report.
- William J. Diamond: A refund in the amount of \$603.50 was issued on 8/29/15. This will be disclosed on the October Quarterly Report.
- Leon A. Elmas: Excessive portion was redesignated to the 2016 General. This will be disclosed on the October Quarterly Report.

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Report.

Mark Escude: These are two different donors and are not in excess of the giving limits.

Emilia Fanjul: Excessive portion was redesignated to the 2016 General. This will be disclosed on the October Quarterly Report.

Joel Farkas: Excess portion was reattributed to his spouse and redesignated to the 2016 General. This will be disclosed on the October Quarterly Report.

Peter Farrell: A refund in the amount of \$820 was issued on 8/18/15. This will be disclosed on the October Quarterly Report.

Rodriguez Valdes-Fauli Fowler: A refund in the amount of \$4600 was issued on 7/18/15. This will be disclosed on the October Quarterly Report.

Saul Fox: A refund in the amount of \$2500 was issued on 7/30/15. This will be disclosed on the October Quarterly Report.

Cyrus Friedheim: A refund in the amount of \$4260 was issued on 8/29/15. This will be disclosed on the October Quarterly Report.

Rob D. Friedman: Excessive portion was redesignated to the 2016 General. This will be disclosed on the October Quarterly Report.

Stanley Gaines: A refund in the amount of \$200 was issued 8/11/15. This will be disclosed on the October Quarterly Report.

Felix Glaubach: (This was listed twice in the letter from the FEC.) Excessive portion was redesignated to the 2016 General. This will be disclosed on the October Quarterly Report.

Ira Goldfarb: A refund in the amount of \$400 was issued on 7/1/15. This will be disclosed on the October Quarterly Report.

Ramon Gonzalez: Excessive portion was redesignated to the 2016 General. This will be disclosed on the October Quarterly Report.

Stephen J. Helfman: : Excessive portion was redesignated to the 2016 General. This will be disclosed on the October Quarterly Report.

David Horowitz: A refund in the amount of \$2080 was issued on 8/29/15. This will be disclosed on the October Quarterly Report.

Laura Ipsen: Excessive portion was redesignated to the 2016 General. This will be disclosed on the October Quarterly Report.

Christopher Jedrey: A refund in the amount of \$1000 was issued on 8/29/15. This will be disclosed on the October Quarterly Report.

Joanne C. Johnson: A refund in the amount of \$30 was issued on 8/29/2015. The additional excessive portion was redesignated to the 2016 General. These will be disclosed on the October Quarterly Report.

Robert M. Johnson: A refund in the amount of \$2400 was issued on 8/28/15. This will be disclosed on the October Quarterly Report.

Darlene Jordan: The excessive portion was returned to the Rubio Victory Committee and refunded. Both transactions were disclosed on the July Quarterly Report.

Fredrick Jubitz: Excessive portion was redesignated to the 2016 General. This will be disclosed on the October Quarterly Report.

Glenna Kendall: A refund in the amount of \$900 was issued on 7/10/15. This will be disclosed on the October Quarterly Report.

Cody Khan: This donor is no longer in excess of his giving limits. The distribution was corrected to accurately reflect contributions to the primary and general. The Committee will either amend the previously filed report or correct this on the October 15, 2015 Quarterly Report.

Christopher Koch: A refund in the amount of \$2000 was issued on 8/29/15. This will be disclosed on the October Quarterly Report.

Rodger Krouse: A refund in the amount of \$4600 was issued on 7/10/15. This will be disclosed on the October Quarterly Report.

Maryann Larson: Excessive portion was redesignated to the 2016 General. This will be disclosed on the October

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Quarterly Report.

Thomas F. Linnen Sr.: A refund in the amount of \$185.20 was issued on 8/23/15. This will be disclosed on the October Quarterly Report.

Bob Loquercio: Excess portion was reattributed to his spouse and redesignated to the 2016 General. This will be disclosed on the October Quarterly Report.

Ned Lyerly: Excessive portion was redesignated to the 2016 General. This will be disclosed on the October Quarterly Report.

Joseph Maher Jr.: A refund in the amount of \$400 was issued on 8/29/15. This will be disclosed on the October Quarterly Report.

Douglas Manchester: A refund in the amount of \$5400 was issued on 7/1/15. This will be disclosed on the October Quarterly Report.

Lothar Mayer: A refund in the amount of \$3.05 was issued on 7/1/15. This will be disclosed on the October Quarterly Report.

Thomas J. Mazzetta: A refund in the amount of \$3240 was issued on 7/30/15. This will be disclosed on the October Quarterly Report.

Christopher Meek: A refund in the amount of \$2500 was issued on 8/7/15. This will be disclosed on the October Quarterly Report.

David Miller: Excessive portion was redesignated to the 2016 General. This will be disclosed on the October Quarterly Report.

Yolanda Montelongo: Excessive portion was redesignated to the 2016 General. This will be disclosed on the October Quarterly Report.

Ruben D. Nava: Excessive portion was redesignated to the 2016 General. This will be disclosed on the October Quarterly Report.

Robert Nickell: Excessive portion was redesignated to the 2016 General. This will be disclosed on the October Quarterly Report.

Suzanne Niedland: A refund in the amount of \$200 was issued on 8/20/15. This will be disclosed on the October Quarterly Report.

Rita Ersfe Norton: A refund in the amount of \$2600 was issued on 7/1/15. This will be disclosed on the October Quarterly Report.

Isaac Olemberg: Excessive portion was redesignated to the 2016 General. This will be disclosed on the October Quarterly Report.

Louis G. Ortega: Excessive portion was redesignated to the 2016 General. This will be disclosed on the October Quarterly Report.

Diana Pankova: A refund in the amount of \$3.05 was issued on 7/1/15. This will be disclosed on the October Quarterly Report.

James A. Patterson: A refund in the amount of \$2600 was issued on 8/1/15. This will be disclosed on the October Quarterly Report.

Tyrone Pike: Excessive portion was redesignated to the 2016 General. This will be disclosed on the October Quarterly Report.

Raul Porto: Excessive portion was reattributed to his spouse. This will be disclosed on the October Quarterly Report.

Andrew Puzder: Excessive portion was redesignated to the 2016 General. This will be disclosed on the October Quarterly Report.

Peter Quinones: Excessive portion was redesignated to the 2016 General. This will be disclosed on the October Quarterly Report.

Balaji Rajan: A refund in the amount of \$5000 was issued on 7/10/15. This will be disclosed on the October Quarterly Report.

John G. Rangos Sr.: A refund in the amount of \$200 was issued on 7/1/15. This will be disclosed on the October Quarterly Report.

Doris E. Rich: A refund in the amount of \$400 was issued on 8/29/15. This will be disclosed on the October Quarterly Report.

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Thomas H. Russell: A refund in the amount of \$2600 was issued on 8/23/15. This will be disclosed on the October Quarterly Report.

John Clemens Ryan: Excessive portion was redesignated to the 2016 General. This will be disclosed on the October Quarterly Report.

Elissa Scannell: Excessive portion was redesignated to the 2016 General. This will be disclosed on the October Quarterly Report.

Ernest Semersky: A refund in the amount of \$10,000 was issued on 7/1/15. This will be disclosed on the October Quarterly Report.

Robert Shapiro: A refund in the amount of \$2600 was issued on 8/25/15. This will be disclosed on the October Quarterly Report.

Annette Simmons: A refund in the amount of \$5400 (\$2700 primary/\$2700 general) was issued on 8/1/15. This will be disclosed on the October Quarterly Report.

Boris Slusky: Excessive portion was redesignated to the 2016 General. This will be disclosed on the October Quarterly Report.

Larry Smead: A refund in the amount of \$4600 was issued 7/1/15. This will be disclosed on the October Quarterly Report.

Helen Spacek: Excessive portion was redesignated to the 2016 General. This will be disclosed on the October Quarterly Report.

George Spix: A refund in the amount of \$2600 was issued on 7/1/15. This will be disclosed on the October Quarterly Report.

Joy Spragens: A refund in the amount of \$3.05 was issued on 7/1/15. This will be disclosed on the October Quarterly Report.

Armando Tabernilla: Excessive portion was redesignated to the 2016 General. This will be disclosed on the October Quarterly Report.

John Tatum: Excessive portion was redesignated to the 2016 General. This will be disclosed on the October Quarterly Report.

Heath Thompson: Excessive portion was redesignated to the 2016 General. This will be disclosed on the October Quarterly Report.

Mark Tortorella: Excessive portion was reattributed to his spouse. This will be disclosed on the October Quarterly Report.

Scott Tranter: A refund in the amount of \$14 was issued on 8/29/15. This will be disclosed on the October Quarterly Report.

Harry Walia: A refund in the amount of \$3.05 was issued on 7/1/15. This will be disclosed on the October Quarterly Report.

Kasari Wasabi: A refund in the amount of \$4599 was issued on 7/1/15. This will be disclosed on the October Quarterly Report.

Steve Waserstein: A refund in the amount of \$1000 was issued on 8/29/15. This will be disclosed on the October Quarterly Report.

Mary Elizabeth Weiss (Weisi): A refund in the amount of \$4800 (\$2500 Primary/\$2300 General) was issued on 8/11/15. This will be disclosed on the October Quarterly Report.

Edward Wenger: A refund in the amount of \$1460 was issued on 8/1/15. This will be disclosed on the October Quarterly Report.

Steven Wheeler: A refund in the amount of \$1350 was issued on 8/14/15. The additional excessive portion was redesignated to the 2016 General. This will be disclosed on the October Quarterly Report.

Suzanne Wright: A refund in the amount of \$2500 was issued on 7/18/15. This will be disclosed on the October Quarterly Report.

Beth Zipper: A refund in the amount of \$2400 was issued on 7/22/15. This will be disclosed on the October Quarterly Report.

Jeffrey Alan Zipper: A refund in the amount of \$2400 was issued on 7/26/15. This will be disclosed on the October Quarterly Report.

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Mark Zmijewski: A refund in the amount of \$4600 was issued on 7/1/15. This will be disclosed on the October Quarterly Report.

Pan-American Life Insurance Company PAC: A refund in the amount of \$2500 was issued on 7/18/15. This will be disclosed on the October Quarterly Report.

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. We are also reviewing our processes to ensure that we are taking every step to avoid these issues in the future. All donors listed as excessive in this letter have either been reattributed, redesignated or refunded.

2.Your letter indicates that the Committee accepted a contributions from LLCs. The Committee verified that these LLCs was not incorporated prior to depositing the contributions. The Committee has requested the partnership attribution where required.

3.The check noted as voided was originally issued in error. A payment in the correct amount was reissued.

4.Although the disbursement descriptions listed in your letter are not included on the list of unacceptable descriptions published by the FEC, the Committee will amend the above referenced report on or before October 15, 2015 to clarify disbursement descriptions. As further explanation:

Payments to Allegiance Crane & Equipment and A to Z Rental were for Event Equipment Rental.
Payments to Jorge Diaz (he is the vendor) and to Damilic Corp. were for Office Equipment Purchase.
Payments to Campaign Solutions and Mustard Seed (originally disclosed as Revenue Shares) were for Online Fundraising Services.

5.The Committee will amend the report on or before October 15, 2015 to include all missing addresses.

Sincerely,

Lisa Lisker
Assistant Treasurer