

A-G79 @5 B9CI G'H9LH'fl 97 : cfa ' - - Ł

December 17, 2015

Ms. Vicki Davis  
Senior Campaign Finance Analyst  
Reports Analysis Division  
Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

IDENTIFICATION NUMBER: C00580100

REFERENCE: OCTOBER QUARTERLY REPORT (07/01/2015 - 09/30/2015)

Dear Ms. Davis:

This statement is in response to the Commission's letter dated November 15, 2015 regarding three items.

First, regarding disbursements for "Pre-Paid Payroll," the report is correct as filed, and is consistent with Commission guidance regarding so-called "ultimate payee." Nonetheless, we are providing additional itemization (providing memo entries for the already existing memo entries). These appear on the Committee's Amended report being filed concurrently with this response.

Second, regarding expenditures from the candidate's personal funds, the itemization appears on the Committee's Amended report being filed concurrently with this response.

Third, you requested clarification regarding the Committee's disbursements for per diems. The Committee can confirm that these per diems were non-cash per diems and that no cash disbursements to any person or vendor for any single purchase or transaction exceeded \$100. No further itemization is required by Commission regulations.

This should answer your questions. Please feel free to contact us if you have any further questions.

Sincerely,  
Timothy Jost  
Treasurer