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NAME OF COMMITTEE (In Full)
WIN JUSTICE

FEC IDENTIFICATION NUMBER
C00672394

Mailing Address 1536 U ST NW

City	State	ZIP Code
WASHINGTON	DC	20009

Harmon, Curran, Spielberg & Eisenberg, LLP
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Washington, DC 20036

July 30, 2019

Sarah Juris, Sr. Campaign Finance and Reviewing Analyst, Reports Analysis Division
Federal Election Commission
1050 First Street, NE
Washington, DC 20463
ELECTRONICALLY FILED

RE: Win Justice, Committee ID: C00672394;
6/25/19 RFAI regarding 12 Day Pre-General Report; and
6/25/19 RFAI regarding 30 Day Post-General Report

Dear Ms. Juris,

I am writing as counsel to Win Justice in response to the Commission's two June 25 Requests for Additional Information (RFAs) related to the above referenced reports. I appreciate your taking the time to speak with me today about these RFAs.

The two reports reference payments to Community Outreach Group LLC ("COG") for \$432,166.13 for canvassing services, \$226,459.60 of which the committee reported as independent expenditures. The remainder of the payment to COG (\$205,706.53) was for canvassing services that were not reportable federal independent expenditures. The canvassing services took place during the pre-election report reporting period, but the payment to COG was not made until the reporting period for the post-election report. Hence, the pre-election report listed the amount due to COG on Schedule D and the reportable independent expenditure as a memo on Schedule E. On the post-election report, the Schedule D reflected the payment of the debt to COG, satisfied via multiple payments, a portion of which were reported as a \$205,706.53 line 21b operating expense on Schedule B and with the remaining \$226,459.60 reported as independent expenditures for several federal candidates on Schedule B. To further complicate matters, these were just some of the canvassing services that COG provided to the committee that were reported on the post-election report.

As we discussed today on the phone, the committee will amend its pre- and post-election reports to split the amount reported on the two Schedules D between amounts for independent expenditures and amount for non-IE operating expenses.

I believe that this letter and the amended reports filed today fully address the concerns raised in the above-referenced RFAs. If you have any further questions, please feel free to contact me at 202-328-3500.

Very truly yours,
/s/ John Pomeranz
Counsel to Win Justice