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NAME OF COMMITTEE (In Full)
AFL-CIO COMMITTEE ON POLITICAL EDUCATION TREASURY
FUND

FEC IDENTIFICATION NUMBER
C90016106

Mailing Address 815 16TH ST. NW

City	State	ZIP Code
WASHINGTON	DC	20006

I am responding to your letter dated April 21, 2017, regarding the 2016 Amended July Report filed by AFL-CIO Committee on Political Education Treasury Fund (the Fund) on September 27, 2016.

With respect to the first item raised in your letter, the Fund was not required to disclose any contributions on Line 6 because it did not receive any contribution which was made for the purpose of furthering an independent expenditure within the meaning of 52 U.S.C. 30104(c)(2)(C). Accordingly, the Fund will not amend its report in order to disclose contributions.

Regarding the second and third items in your letter, the Fund inadvertently and unintentionally erred in omitting three expenditures from its originally-filed July Quarterly Report and in failing to file 48-Hour Reports disclosing the same expenditures. Two of the expenditures were paid to Upland IX, LLC, one for \$25.00 for a text message disseminated on June 8, 2016, in opposition to Donald Trump for the office of President and the other for \$250.00 for a text message disseminated on June 16, 2016, in support of Hillary Clinton (Clinton) for the same office. The third expenditure was in the amount of \$30,000.00, paid to New Partners for digital advertising in support of Clinton also on June 16. The inadvertent failure to file 48-Hour Reports and omissions from the original July Quarterly Report resulted from an error in communication that led to the expenditures not being entered in the Funds reporting software as independent expenditures. The error was not discovered until additional digital advertisements were under consideration, at which point the Fund promptly amended its July Quarterly Report. Moreover, I note that when the Fund learned of the error, it took appropriate steps to improve internal communications procedures, including the addition of the Funds compliance coordinator to all e-mails concerning plans for future digital independent expenditure communications.

The Fund otherwise reported \$234,999.94 in independent expenditures to the Commission in a timely manner. The \$30,275.00 at issue here thus comprised just 12.3% of the Funds total independent expenditures in 2016. And, while the Fund certainly regrets the late reporting of these independent expenditures, it did report them 43 days before the election, and they supported the same candidate that the Fund had already supported with other substantial independent expenditures on June 23, which the Fund timely disclosed on a 48-Hour Report. Accordingly, the public was deprived only briefly of some specific information about a small fraction of the Funds independent expenditures and the general public was fully informed before they cast their votes on Election Day and during any early voting that occurred.

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

Renata Strause
Counsel for AFL-CIO Committee on Political Education Treasury Fund