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October 5, 2015

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
48-Hour Reports

Dear Ms. Seufert:

In follow up to your telephone conversation with a representative of Security Is Strength PAC (the "Committee") on September 30, 2015, the Committee has submitted four 48-hour reports. The identification numbers for these reports are as follows: FEC-1026668; FEC-1026670; FEC-1026676; and FEC-1026683.

There are two issues that we would like to bring to your attention regarding these reports.

First, in connection with the filing of the above referenced 48-hour reports on October 3, 2015 (along with a fifth 48-hour report, which was timely filed and assigned the identification number of FEC-1026684), an apparent FECfile software issue prevented the Committee from aggregating the identified disbursements for the relevant elections and displaying correct year-to-date totals on the reports. We have been in contact with the FEC's filing office today to troubleshoot, and we are hopeful that we can soon resolve the year-to-date issue in the reports.

Second, as we previously explained in our Form 99 filed on October 1, 2015 (FEC-1026386), the Committee did not overlook filing these 48-hour reports. 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

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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, it wanted the public to be fully aware of them.

We have offered this explanation in hopes that the FEC will take these extenuating circumstances into consideration when evaluating the late reports.

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