MISCELLANEOUS TEXT (FEC Form 99)

January 17, 2013

Arman Tarzi
Campaign Finance Analyst
Federal Election Commission
999 E St., NW
Washington, DC 20463

Reference: April Quarterly Report (1/1/12-3/31/12)

Dear Mr. Tarzi:

This is in response to your request for additional information dated December 13, 2012.

1. Your letter indicates that the Committee disclosed two contributions that appeared to be in excess of the giving limit. Juan Gutierrez gave $10,000 but reattributed $5000 to his spouse, Marta Gutierrez. Jorge Mas gave $10,000 but reattributed $5000 to his spouse, Aleyda Mas. Due to a software issue, the reattribution entries did not itemize on the FEC report The above referenced report has been amended to accurately itemize these transactions.

2. Your letter indicates that two donors were disclosed with inaccurate year to date aggregates. Juan Gutierrez and Jorge Mas each gave $10,000, but had year to date aggregates of $5000. The aggregates are correct. Due to the software issue noted above, the reattribution entries were not itemized on the FEC report. The above referenced report has been amended to accurately reflect these entries. It is now clear that the aggregates are reported correctly.

3. As noted on the memo included with the FEC report, online processing fees that are reported as independent expenditures are disclosed as being paid to Reclaim America PAC, as there is no other vendor to disclose. These are processing fees incurred by the PAC to receive and distribute earmarks. The Committee then discloses an offsetting entry as a negative operating expense so that the fees are not over-reported. This is not an internal committee transfer. This method has been recommended by and approved by the Federal Election Commission.

4. Expenditures noted as Printing/Postage and Direct Mail/Postage that are disclosed on Schedule B, Line 21(b) are operating expenses and are not expenditures for public communications or voter drive activity containing express advocacy. These are accurately disclosed on line 21(b).

Sincerely,

Lisa Lisker
Treasurer

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