



Law Offices of Heather Sidwell Morris, P.A.

August 21, 2014

VIA ELECTRONIC MAIL

Thomas E. Hintermister
Assistant Staff Director, Audit Division
Federal Election Commission
999 E Street, NW
Washington, DC 20463

RE: Request for Extension to Make Final Repayment of Unspent Convention Funds

Dear Mr. Hintermister:

The Committee on Arrangements for the 2012 Republican National Convention ("COA") writes to request a brief extension of time – to September 30, 2014 – to make its final repayment to the U.S. Treasury of unspent convention funds.

Pursuant to 11 CFR § 9008.12(5)(iii), all unspent funds must be repaid to the U.S. Treasury no later than 24 months after the last day of the convention. The 2012 Republican National Convention occurred August 27-30, 2012, and consequently the 24-month period is set to expire on August 30, 2014. The Commission, however, did not approve the Final Audit Report relating to the 2012 Convention and including the Commission's repayment determination until August 19, 2014 – just eleven (11) days before the regulatory deadline.

An extension is appropriate and warranted where, as is the case here, good cause exists. Corresponding regulations at 11 CFR § 9007.2(d)(2) provide committees a 90-day period within which to make repayment, from the date of service of the Commission's determination. Inherent in 11 CFR § 9007.2(d)(2) is a recognition that committees need ample time to properly wind down their operations. Eleven days is simply not practical. Extending the repayment period some 30 days to September 30, 2014, would allow the COA sufficient time to prudently wind down its operations and provide FEC Audit staff with all actual (as opposed to estimated) financial information in order to determine whether any adjustments to the repayment determination cited in the Final Audit Report are warranted.

The COA believes that its request is reasonable in light of the protracted audit process and impending deadline, and urges the Commission to grant an extension to September 30, 2014.

Thank you for your consideration of this matter.

Respectfully,

A handwritten signature in black ink that reads "Heather Sidwell Morris". The signature is written in a cursive, flowing style.

Heather Sidwell Morris
*Counsel to the Committee on Arrangements
for the 2012 Republican National Convention*