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August 15, 2013

Via E-Mail ([lfraser@fec.gov](mailto:lfraser@fec.gov))

Ms. Lynn M. Fraser  
Federal Election Commission  
Alternative Dispute Resolution Office  
999 E Street, N.W.  
Washington, DC 20463

Re: Re: ADR #642 Hardworking Americans Committee

Dear Ms. Fraser:

On behalf of Hardworking Americans Committee, I am writing in reference to ADR #642 and wish to provide further explanation to the Alternative Dispute Resolution Office:

An independent expenditure was made on October 26, 2012 for \$30,000 to Strategic Media Placement and was not initially reported on a 24-hour expenditure report. There was apparently some confusion about the timing of the expenditure, because there appears to have been another \$30,000 independent expenditure to Strategic Media Placement made on November 1, 2012, which was reported on a 24-hour expenditure report. Because the expenditures were for the same amount and to the same entity within days of each other, a clerical error was apparently made in only reporting one of the expenditures on a 24-hour expenditure report. The post-election report, however, did reflect both of these expenditures and was timely filed on December 6, 2012. Once it was brought to the Hardworking Americans Committee's attention that the expenditure in question should have more properly appeared on a 24-hour expenditure report, the Committee promptly filed the 24-hour expenditure report.

We also note that all other 24-hour expenditure reports for the Committee were filed within the required time period, and that these occurred both before and after the October 26<sup>th</sup> expenditure. Overall, the Committee filed five 24-hour expenditure reports for a total of \$1,139,079.38 worth of independent expenditures. Of that amount, only \$30,000 was not reported in a timely basis due to the clerical oversight.

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As the Committee has filed all other 24-hour expenditure reports within the required filing period, and the Committee does not have a history of late filings or failure to file, we are asking for your consideration to not pursue any further action based on this one oversight which has now been corrected.

We would welcome a conference with you to further discuss this matter, answer any questions you may have, and discuss any suggested preventative steps to ensure for continued compliance with reporting requirements.

Sincerely,

DYKEMA GOSSETT PLLC



W. Alan Wilk

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