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A T T O R N E Y S

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May 14, 2012

VIA ELECTRONIC MAIL

Mr. Daniel A. Petalas
Associate General Counsel for Enforcement
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

Mr. Petalas:

Your letter dated May 4, 2012 invited us on behalf of our client, Wil Cardon for U.S. Senate (the "Committee"), to "amplify or clarify its response." We write today to provide additional information regarding the personal funds Wil Cardon loaned to the Committee and the absence of payments to Mr. Cardon from the three entities named by the Complainant.

The Committee's original response noted: "Wil Cardon has ... loaned personal funds to his campaign."¹ All funds loaned to the Committee were disbursed to the Committee from Mr. Cardon's personal bank account at Johnson Bank, which holds Mr. Cardon's earned compensation, investment proceeds, and income from trusts established before the 2012 election cycle.

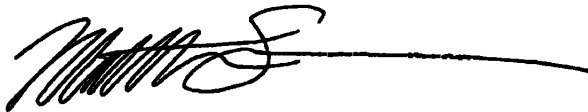
The Committee's original response also stated: "no portion of the line of credit extended by Comerica Bank to Boa Sorte and Rio Claro was paid to Wil Cardon ... [and] [i]n fact, the entities have not paid any funds to Wil Cardon in 2011 or 2012."² This statement should be taken at face value. Boa Sorte, Rio Claro, and The Cardon Family, LLC have not disbursed any monies to Mr. Cardon for any purpose during 2011 or 2012.

We hope and expect that this letter furnishes helpful additional information that will assist the Commission in reaching a determination in this Matter. Please contact us if you have any additional questions.

Sincerely,



Kirk L. Jowers
Caplin & Drysdale, Chtd.



Matthew T. Sanderson
Caplin & Drysdale, Chtd.

¹ Response at 1. See also Cardon Aff. at 3.

² Response at 2. See also Frick Aff. at 12-13; Cardon Aff. at 5.

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