

**HUSCH BLACKWELL**

Lowell Pearson  
Office Managing Partner

235 East High Street, P.O. Box 1251  
Jefferson City, MO 65102-1251  
Direct: 573.761.1115  
Fax: 573.634.7854  
lowell.pearson@huschblackwell.com

January 25, 2021

***VIA E-MAIL TO  
[CELA@FEC.GOV](mailto:CELA@FEC.GOV)***

Jeff S. Jordan  
Assistant General Counsel  
Federal Election Commission  
Washington, DC 20036

Re: 20L-28 / Americas PAC / C0059906

Dear Mr. Jordan:

I represent Americas PAC and its Treasurer, Tom Donelson. A designation of counsel form has been previously filed. This letter is to respond to the Reports Analysis Division Referral dated December 15, 2020.

The Referral and its attachments assert that Americas PAC did not file three required 48-hour reports for six expenditures disseminated on May 13, 2020.

The Referral references an expenditure of \$359,992 disseminated on May 13, 2020 supporting or opposing John James. The expenditure was timely reported on schedule E-24/48 Hour Report of Independent Expenditures, but the candidate was incorrectly identified as Joni Ernst, not John James. This was corrected promptly on July 13, 2020 when the error was brought to the attention of Americas PAC.

The Referral also discusses expenditures supporting or opposing Cindy Axne and Abby Finkenauer. The issue with these expenditures occurred because Americas PAC's media vendor split certain expenditures among different races, and did not inform Americas PAC's counsel. The issue was discovered in response to MUR 7756, which addressed Ms. Finkenauer. In responding to MUR 7756, the Cindy Axne expenditures were also discovered. As stated in my July 23, 2020 response to MUR 7756, when the issue was identified on July 8, 2020. Americas PAC promptly remedied it on July 13, 2020.

Given these circumstances, further action is not warranted. Good faith errors were promptly corrected.

**HUSCH BLACKWELL**

Jeff Jordan  
January 25, 2021  
Page 2

Please address any further communications to me.

Sincerely

LOWELL D. PEARSON

LDP:cst