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signed by
Christal
Dennis
Date:
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From: Robert San Luis
To: CELA
Subject: Fwd: RR 17L-43
Date: Sunday, December 17, 2017 3:33:09 PM

uCDennis

Copying to official email address of record. Thank You.

----- Forwarded message -----

From: Robert San Luis <[redacted]>
Date: Thu, Dec 14, 2017 at 6:52 PM
Subject: Re: RR 17L-43
To: Christal Dennis <CDennis@fec.gov>

Ms. Dennis,

Thank you for the attachment and the outreach. Our intent and action was always to comply with all requirements as demonstrated in the filing of the information in period reports. It is my position that I executed according to a plain reading of the 24/48 hour reporting charts online that someone looking there for guidance would make. This was my first effort to assist a political effort. There was some initial confusion about which information the RAD Analyst was seeking on the RFAI. Once that was clarified, the Analyst provided guidance on 24/48 hour reporting requirements that was different than what I believe the plain reading of someone looking to the FEC chart I referenced would determine. The guidance from the RAD Analyst received verbally at that point was then my basis for going forward. The expenditures in question were initially reported as they were based on what I believe is the plain reading of the chart. There was no value in non-disclosure as they were reported in media from the period reports just days later. The RAD Analyst was a very effective communicator and offered clear direction which I followed going forward preventing any further issues. As the PAC was brought to a "zero" status as required to file a termination report and it has not been active since the 2016 cycle any responsibility would now fall on me.

I will continue to file mid year and year end reporting until the matter is resolved in a way that allows the FEC to accept a termination.

I regret any additional administrative burden this has placed on the RAD Analyst and your section as I can imagine it was a very busy year for you. Please advise of status and any conciliation proposals through this email or the mailing address on file.

Best Regards,

Robert San Luis

On Thu, Dec 14, 2017 at 10:13 AM, Christal Dennis <CDennis@fec.gov> wrote:

Mr. San Luis,

I have enclosed a copy of the notification letter that was sent to you in the event the office does not locate it. Thank you again and please let me know if you have any questions or concerns. Enjoy your day.