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April 28, 2018

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Via E-mail (to Audit@fec.gov)

Federal Election Commission  
Audit Division  
Ms. Zuzana Pacious  
999 E. Street N.W.  
Washington, D.C. 20463

RE: Response of the Colorado Republican Committee to IAR dated February 25, 2016

Dear Ms. Pacious:

This firm represents the Colorado Republican Committee (the "Committee"). This letter will serve as the Committee's response to the Commission's Interim Audit Report dated February 25, 2016. I address the Committee's response to each of the Audit Division's interim Findings and recommendations in turn.

Finding 1 - "Misstatement of Financial Activity"

The Committee agrees with the Audit Division's recommendations regarding Finding 1(A) and Finding 1(B). The misstatements were inadvertent. The Committee will file amendments to the relevant reports on or before May 9, 2016 consistent with the Audit Division's recommendations.

As to Finding 1(C), the Committee disagrees with the Audit Division's recommendations. The Committee has previously provided documentation—as noted in the Interim Audit Report—demonstrating that the account in question (the "Colorado RNC Host account") is not controlled by the Committee and is therefore not an unreported federal account. The Committee's position is that it has by its prior correspondence and cooperation with Commission staff sufficiently demonstrated that it does not control the Colorado RNC Host account. A copy of the prior correspondence is enclosed with this letter.

Finding 2 - "Reporting of Apparent Independent Expenditures"

The Committee disagrees with the Audit Division's recommendations as to Finding 2. The Committee has—as noted in the Interim Audit Report—consistently asserted that the communications at issue are not reportable as independent expenditures because they are subject to the volunteer material exemption. The Committee has provided documentation substantiating volunteer involvement including the volunteer names, the location the work was done and the date of the volunteer involvement. The Committee appreciates the Audit Division's desire for additional information regarding the volunteer work on these communications, but the Committee has provided all the documentation in its possession. The Committee has never before been requested to provide volunteer timesheets and photographs and cannot do so here because it did not collect timesheets or photographs from the volunteers at issue. The Committee believes it has provided enough information to substantiate application of the volunteer material exemption. As a result, the Committee will not make any amendments to disclose these disbursements as independent

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expenditures, and continues to believe that no 24/48 hour report was necessary for any of these disbursements.

Finding 3 – "Recordkeeping for Communications"

The Committee disagrees with the Audit Division's recommendations as to Finding 3. After Audit staff provided the Committee with a schedule of disbursements for which it required further documentation, the Committee provided all documentation in its possession in a series of letters, USB thumb-drives and online file site links between January 31, 2014 and August 11, 2014. The Committee is prepared to provide this information again if the Audit Division requires another copy. The Committee is working to associate the already provided invoices and communications with each other and will provide the Audit Division with a final record associating all communications with invoices as soon as that record is complete.

Finding 4 – "Failure to Itemize Debts and Obligations"

The Committee agrees with the Audit Division's recommendations as to Finding 4. Given the Commission's determination that the amounts owed to the Committee's former legal counsel were not privileged from disclosure, the Committee will amend its reports for the applicable period to reflect these amounts as debt. These amendments will be completed by May 9, 2016. The Committee will not amend its reports to cover the amounts allegedly owed to its former get-out-the-vote ("GOTV") vendor, as that contract was terminated. The Audit Division requested that the Committee provide documentation of this termination – such documentation was provided to Audit staff on December 8, 2014. Another copy of this communication is enclosed with this letter.

Thank you for your attention to this response; please do not hesitate to contact me should you have any questions regarding it.

Regards,



Christopher O. Murray

cc. Mary Moss, Federal Election Commission  
Steve House, Colorado Republican Committee

Enclosures