

Americans for Legal Immigration PAC
PO Box 30966, Raleigh, NC 27622
Identification Number: C00405878

May 16, 2008

Laura E. Sinram
Senior Campaign Finance Analyst
Reports Analysis Division
Federal Elections Commission
Washington, DC 20463

Dear Laura E. Sinram,

This letter is in response to your request for information regarding the Year End Report (7/1/07-12/31/07).

As previously stated in our letter dated April 16, 2008:

"ALIPAC discloses yearly contributors that exceed \$200, as required by law.

We make our "Best Effort" to obtain all required information. We rarely have problems gathering the full name, address, city, state and zip of our contributors.

However, the Occupation and Name of Employer response rates are much lower, due to the documented attacks on employment, which many Americans that have spoken out on the issue of illegal immigration have suffered. Many of our supporters work for federal and state governments and are in the healthcare, law enforcement and educational fields. To have their occupation listed, may put their jobs at risk, due to the hostility and underhanded practices of our opposition.

It is our job to make a best effort, but donors have a right to refuse this request of information and many do.

ALIPAC raises funds through our website and by contacting prior donors.

Our website had a detailed Privacy Policy and a contributions page.

The contributions page is the first effort, to obtain the occupation and employer information, where the following is clearly stated.

'Federal election law requires political committees to use best efforts to report the name, mailing address, occupation, and name of employer of individuals who contribute. An individual may not contribute more than a total of \$5,000 per year to the committee. Federal law prohibits contributions to the committee from the general treasury funds of a corporation, labor organizations or national banks (including corporate or other business entity credit cards), or from any person contributing another's funds, from a Federal government contractor, or from a foreign national who lacks permanent resident status. Contributions are not deductible for Federal income tax purposes.'

The contributor is then presented with fields of information to fill out.

The Occupation and Employer fields must contain some date or the form will not allow a donor to proceed. This is a strong method on our part and has likely cost us many donations, as donors are apt to write 'None of your business; into

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those fields.

We make subsequent attempts to gather this information on all donors when we send them letters. Each letter has a reply envelope, with our address preprinted on it and a reply card that contains the following required language.

'Federal law required us to use our best efforts to collect and report the name, mailing address, occupation and name of employer of individuals whose contributions exceed \$200 in a calendar year.'

Also, an existing donor of ALIPAC receives these letters twice per year.

We call those that give over \$200 per year on the phone, if they did not provide the employer and occupation information. Sometimes we reach them and they volunteer the information. Sometimes we reach them and they decline to provide this information. Sometimes we cannot reach them or do not hear back from them after leaving a message.

We feel that our dual request for occupation and employer information upon any first donation, insistence that some response be given upon donation, combined with our multiple yearly subsequent requests for the occupation and employer information, combined with attempts to gather the information by phone for out \$200+ donors is quite extensive."

In addition to the above procedures, on or about April 16, 2008 we submitted an amendment to the Mid-Year Report (1/1/07-6/31/07), which included updated and additional information about donors. Also, a regular review will be conducted of the donors that have contributed over \$200 in a calendar year and the updated information will be submitted by amendment to the appropriate report or by listing the information in a Schedule A memo.

"Please let us know if you believe we need to engage in any additional efforts as we want to make sure we4 are in full compliance with the law."

In regards to the adequate identification of employer or occupation, I will contact the contributors and attempt to obtain adequate occupation and employer for each person that has contributed over \$200 in the aggregate during the calendar year, that we do not currently have adequate information for. The inadequately identified entries of "General Worker", "Self" and "None" are direct and quoted replies from our donors, in response to our enquiry and attempt to obtain the occupation and employer for each contribution. If adequate information is obtained, it will be submitted in an amended report on Schedule A supporting Line 11 (a)(i). If "Best Effort" is found to be a more appropriate response, that will be submitted instead. In the future, I will contact your office about possible inadequate employer and occupation responses, prior to submitting a report.

In response to questions regarding Schedule B disclosure and expenditures "Mailing List Processing", "Movie/Theater Rental", "Office Equipment Monitory for Video", "Postage", "Press Release Distribution", "Press Release Service", "Printed Materials Advertisement", and "Theater Rental" were communications about our organization and issue stances and not for or against any federal candidate or expressed advocacy as defined under 11 CFR 100.22.

In response to questions regarding expenditures "Commercial Huckabee and ATM fee", "Phone Bank Services", "Voterlist Online". We are certain that our efforts regarding Mike Huckabee do not qualify as expressed advocacy and after reviewing our communication materials and the FEC materials we have concluded these three expenditures were property reported on the Year End Report (7/41/07-12/31/07) Schedule B supporting Line 21 (b) and they are not independent expenditures. We made communications that took issue with one of Mike Huckabee's immigration stances and did not advocate his election nor defeat.

Regarding our two donations to Ted Hayes in 2007. These were made to Ted before he had filed or announced for federal office and before we had any knowledge that he would be running for congress in 2008. Specifically, one donation was to cover his hotel room in Phoenix, AZ, where he was a guest speaker at an event that did not involve candidates or

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elections. Our direct donation dated 9/27/07, in the amount of \$500 was given to support his general activism on our issue and did not reflect nor relate to any communication for federal elections.

In response to disclosure of limited payments for administrative expenses. As previously stated on April 15, 2008, "At ALIPAC, we are proud of the fact that our administrative operating expenses are so low.

This is due to three reasons. 1. Our organization is mostly operated by volunteers. 2. We are very frugal with our limited funds. 3. Our office is in cyberspace, inside of the website <http://www.alipac.us> where our officers and volunteers access the equivalents of office resources from home computers, wireless laptops, cyber cafes and public libraries.

While we realize our structure may be non-traditional, we are an activism PAC that selected the 527 corporation to facilitate our activism efforts and are in new territory with our operations.

All of our operating cost are reflected in line 21(b) of our reports.

We receive no support from any connected organizations.

We have incurred no debts.

All administrative expenses have been adequately disclosed and we will begin to clarify this via letter to your office at the beginning of each non-election year." We understand that the letter submitted on April 15, 2008 would qualify as notification.

Regarding reported financial activity that was reflected on the wrong line of the Detailed Summary Page. As previously described, we have not contributed to or made an in-kind contribution to any federal candidates, during the Year End Reporting period. Therefore, no financial activity was reported on Schedule B, supporting Line 23.

Sincerely,

Jane Patterson
Treasurer
Americans for Legal Immigration PAC

CC
William Gheen
