

ETEXT ATTACHMENT

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September 30, 2005

Ms. Rosa J. Lewis
Campaign Finance Analyst
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: HILLPAC C00363994
May Monthly Report (4/01/05-4/30/05)

Dear Ms. Lewis:

This letter is in response to your August 31, 2005 request for information concerning HILLPAC's May 2005 monthly report, covering period 4/1/05 - 4/30/05.

1. Four M Investments, LLC. The report was amended to indicate that the funds were received from a permissible source and that the contribution was attributed to members of the LLC.
2. Payment from O'Brien, McConnell & Pearson. The payment received from O'Brien, McConnell & Pearson on April 21, 2005 was for list rental income and was properly reported on Line 17 of HillPAC's May 2005 Monthly Report. HillPAC makes its direct mail list available for rental through a list brokerage and management company (the "list broke") that has been in business for a number of years. The list broker sets the price for the HillPAC list based on its experience and expertise in the list rental market. These variables include, among other things, the freshness of the list and the historical average donation amount of the active donors on the list. When the HillPAC list is rented, the list broker retains a commission for its fee and the net amount is paid to HillPAC. HillPAC then properly reports the receipt of the list rental income on its FEC reports.
3. Column B Totals. The report was amended to reflect 2005 activity only.
4. Expenditures for "Printing," "Direct Mail: Consulting," "Consulting/Communications," and "Direct Mail: Production." No portion of expenditures properly described as "Printing," "Direct Mail: Consulting," "Consulting/Communications," and "Direct Mail: Production" were for public communications (as defined by 11 CFR Sec.100.26) or voter drive activity (under 11 CFR Sec. 106.6(b)(2)(i)) containing express advocacy (as defined under 11 CFR Sec.100.22). Accordingly, no amendment to the report is necessary because the expenditures were properly disclosed on Schedule B supporting line 21(b).
5. Election Year Designation. The report was amended to reflect the correct year of election for the federal candidate to whom HillPAC made a contribution.

If you have any questions regarding this receipt, please contact us at your convenience.

Sincerely,

James Lamb
Counsel, HillPAC