

January 28, 2011
Nicole Miller
Campaign Finance Analyst
Reports Analysis Division

Dear Ms. Miller,

As per our conversation, I have reviewed your request for additional information dated January 19,2011 and have addressed the issues below.

1. Western Representation PAC qualified as a "Muliti-candidate" committee on 3/19/2010. A mailed copy of FEC Form 1M was received by the FEC on 3/29/2010. Your letter dated 3/29/2010 was not received and I was unaware of your request to file Form 1M electronically. I have subsequently filed Form 1M electronically with the date (3/19/2010) Western Representation PAC qualified as a multi-candidate committee.

Missing 48 Hour Notices:

The expenditure of \$2600.00 to CBS Radio-Newsradio 840 KXNT on 9/13/2010 was an inadvertent duplicate entry and was included in a \$5100.00 expenditure originally reported on 9/7/2010 which was the date the ad time was ordered. The expenditure was reported on Form 24 on 9/7/2010 (FEC-491724).The vendor billed \$2600.00 on 9/13 and \$2500.00 on 9/15. I inadvertently entered part of the expenditure a second time on Form 3X. I have corrected the entry and included a memo attachment on the amended filing.

The expenditure of \$1000.00 to 99.1 FM Talk on 9/24/2010 was also inadvertently duplicated and was included in an expenditure reported on 9/7/2010 in the amount of \$2280.00 (FEC-491724). The billing was divided with one invoice for \$1280.00 and one invoice for \$1000.00. I inadvertently entered part of the expenditure a second time on Form 3X. I have corrected the entry and included a memo attachment on the amended filing.

The expenditure to Newsmax Media Inc in the amount of \$11,000 was dated incorrectly as 9/13/2010 due to a data entry error. The expenditure was reported on a 24 hour notice on 10/13/2010 with the incorrect date (FEC-498806). The correct date of the expenditure was 10/13/2010 and I have filed an amended 24 hour report with FEC filing number FEC-709118 and an amended Form 3X for the period covering 9/1/2010-9/30/2010 and an amended Form 3x for the 12 Day Pre General period reflecting the correct entries.

The expenditure to Paramount Communications Group for \$241.81 reported on Form 24 filed 9/29/2010, FEC filing number FEC-495574 was dated 9/28/2010 when the expenditure was processed although it was initially entered into the system on 9/21/2010 when the invoice arrived. The expenditure referred to e-mail communication to raise money for Western Representation PAC for our campaign opposing Barney Frank, MA. I had initially entered the expenditure as a "fund-raising/solicitation" expense and after speaking to the treasurer of another PAC felt it could be interpreted as an IE and should be reported as such to assure we were in compliance with FEC regulations. Two additional expenditures were included in the same invoice to Paramount Communications Group were reported on the same form for fund-raising e-mails. \$610.00 regarding support for Joe Miller, AK and \$1089.00 regarding support for Sharron Angle, NV.

The expenditure dated 9/21/2010 to CBS Radio-Newsradio 840 KXNT dated 9/21/2010 on Form 3X by error. The expenditure was reported on Form 24 with a date of 9/23/2010 which was the correct date of the expenditure and filed 9/25/2010 FEC filing number FEC-495574. The error was due to receiving a pre charge notice from the vendor on 9/21/2010 and the date of the actual expenditure was recorded on Form 24 correctly as 9/23/2010.

I will be happy to provide additional documentation regarding these expenditures upon your request.

ETEXT ATTACHMENT

Thank you for your consideration in this matter.

Roger Stockton, Treasurer
Western Representation PAC