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August 21, 2008

Lauren Lien
Jeff Pope
Reports Analysis Division
Federal Election Commission
999 E. Street, NW
Washington, DC 20463

Re: Hillary Clinton for President; FEC ID No. C00431569, June Monthly Report (5/1/08-5/31/08)

Dear Ms. Lien and Mr. Pope,

This is in response to your letter requesting additional information pertaining to the above-listed report of Hillary Clinton for President (the Committee). You have requested additional information on the reattribution, redesignation, or refund of certain contributions that are so marked on this report. The Committee has reviewed the contributions noted by you and is providing the following information. An Amendment is being filed to correct or clarify aggregation, designation, and attribution where needed.

For a majority of the contributions noted by you, the Committee timely refunded or reattributed the excessive portion of the contribution, i.e., within sixty days, and it is so reported on the Committee's June, July or August Monthly Reports on Line 28a or as a memo entry on 17a which have already been filed.

In some cases, the Committee found data entry errors as a part of its review, cure and notification process and made the needed corrections. Please note that the Committee continues to work on review and improving our data entry.

Please note that the Committee has always intended to fully comply with the sixty day reattribution and redesignation provision. Strict procedures are used by the Committee to ensure that all contributions are handled in a manner in full compliance with this and all other applicable provisions.

In addition you have requested information regarding the Offsets from Business Tech Consulting, City of Davis, International Bay Clubs and United States Secret Service. The refund from City of Davis was for a payment the Committee made to their division of Parks & Community Services also at 23 Russell Blvd, Davis, CA on 3/23/07 for \$890. The Balboa Club is a division of International Bay Clubs and the Committee's refund was made by the parent company International Bay Clubs. The Committee paid Balboa Club, 1221 W Coast Highway, Newport Beach CA on 5/9/2008 \$5000, the refund issued by International Bay Clubs also at 1221 W Coast Highway, Newport Beach CA was for a portion of the payment. The reimbursement from the United States Secret Service is for their share of travel cost the Committee paid. The offset by Business Tech Consulting was an inadvertent error and was deposited by mistake. It has been returned and will be reported on the Committee's September Monthly.

You have asked for additional information on several debts. As the Commission notes in the report instructions debts under \$500 and less the 60 days do not need to be reported. All of the debts noted by the Commission are under the reporting threshold except one for \$500 even. Once the Committee's debt to the vendor exceeds these limits the Committee then includes them as a debt owed. The Committee will amend to add the Historic Salisbury Foundation to the May Monthly debt.

With respect to the final item noted by you, when reimbursements to staff for travel have exceeded \$500, the Committee has, in fact, itemized on its Schedule B the related payments from staff to vendors when such payments have exceeded

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\$200 for the election cycle.

You have also noted that, in some cases, the purposes for the Committee's debts to individuals for travel reimbursements on Schedule D is different from the purposes made for payments to those same individuals on Schedule B. There are two explanations for this. First, the expenditures actually made on Schedule B are, in fact, for different purposes, i.e., different obligations, than the amounts unpaid and owed on Schedule D. However, because it is the same individual who was paid and to whom the debt is owed, the payment is disclosed on Schedule D as a payment this period, even if it was for other purposes. In other words, the Committee may owe a staff member travel reimbursements, which are unpaid and a debt, while at the same time, paying that same person a salary, which is not part of the debt.

Therefore, the purpose of the debt is different than the purpose of the expenditure. The Committee's reporting software automatically aggregates these payments for the this period field on Schedule D. However, the Committee is of the understanding that the Commission is requesting that only payments made to reduce the debt portion be included as payments this period and that other payments to the same creditor be excluded. (RAD referred the Committee to the instructions for Schedule D-P, even though the instructions do not indicate that only payments made to reduce debts be included in the this period field.) Although the Committee believes that this is a change from past Commission requirements, it will seek to have its reporting software changed, so that the information may be separated. However, the Committee is not yet aware whether this change to the reporting software may be able to be effectuated.

The second reason that some of the purposes on Schedule D are different than the expenditure purposes on Schedule B is because the Committee more fully itemizes the purposes on Schedule B. Whereas the purpose on Schedule D may indicate travel, the full itemization of the expenditure on Schedule B may indicate travel, per diem, meal expense, and office supplies. This is due to the reporting software that the Committee uses for the debt purposes, which does not easily permit disclosure of multiple purposes on the Schedule D. The Committee will seek a correction to its reporting software and will endeavor to amend to clarify additional purposes on the Schedule D.

I hope this information is sufficient for your review. However, should you desire any additional information, please contact our Counsel, Eric Kleinfeld, at 202-293-1177.

Sincerely,

Shelly Moskwa
Treasurer, Hillary Clinton for President

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