

January 2, 2008

Mr. Michael Hartsock  
Senior Campaign Finance Analyst  
Reports Analysis Division  
Federal Election Commission

Dear Mr. Hartsock:

This filing constitutes a response to your letter dated December 5, 2007.

None of the expenditures made for "Fundraising Consulting" on schedule H4 of our November Monthly Report (10/01/07 - 10/31/07) were made on behalf of specifically identified federal candidates.

Furthermore, as these expenses were for general advice on fundraising and can not be linked to a specific fundraising event or solicited contribution, these are most appropriately (in accordance with our verbal conversation last fall) categorized as "administrative" expenses. It would be impossible to allocate according to the "funds received" method as we have received no funds as a result of these consultations.

We hope this response answers your concern.

Sincerely yours,

Matt DeBergalis  
Treasurer

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