

February 16, 2011

Mr. David Butler
Campaign Finance Analyst
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: Pre-general Report (10/1/10-10/13/10)
FEC ID C00044842

Dear Mr. Butler:

In response to your letter dated January 12, 2011 requesting additional information:

1. Payments for direct mail identified in your letter and reported on Schedule B supporting Line 30(b) meet the conditions under 11 CFR 100.87 and are exempt from the definition of a contribution or expenditure. Additionally, transfer-in funds from a National Committee were not used to fund these activities as the committee keeps separate bank accounts to differentiate these types of funds.

Sincerely,

Joel Jukus, C.P.A.
Comptroller
