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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, Form 99 (6/27/08)

Dear Ms. Lien and Mr. Pope,

This is in response to your letter requesting additional information pertaining to the above-listed filing of Hillary Clinton for President (the Committee). You have requested additional information on the debt reporting of certain vendors and payments made to the vendors. The Committee has reviewed the vendors noted by you and is providing the following information.

You have 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. 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 Committees reporting software automatically aggregates these payments for the this period field on Schedule D. If a vendor is listed on the debt schedule then all invoices are included in the Amount incurred this period column even if it they do not become a part of the debt and are paid within the month. The payments are included in the Payment this Period column. The Committee finds this the most accurate way to report the payments to vendors on the debt schedule. 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.

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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