

This letter responds to Ms. Nicole Della Rocco s letter requesting additional information for the amended October Quarterly Report (7/1/2008 9/30/2008). Following is our response to each of the five items in her letter:

1. In researching the \$100 discrepancy between the beginning balance of this report and the ending balance of the previous report, we found that, during the period from April 1 through June 30, 2008, we had corrected a \$100 overstatement of an unitemized contribution, but we did so AFTER filing the July quarterly Report (April 1 through June 30, 2008), which is why there is a difference. The beginning balance of \$40,322.21 as of July 1, 2008 is correct as reported.
2. The Schedule E total of \$861,293.99 represents the cumulative total of independent expenditures supporting John McCain for the year-to-date (as of Sept. 30, 2008), and the \$259,087.81 represents the cumulative total of independent expenditures opposing Barack Obama for the year-to-date (as of Sept. 30, 2008).
3. The poll and analysis expenditure was not a so-called push poll or advocacy poll, but rather a legitimate survey of public opinion, and the questions addressed to respondents did not contain any words of express advocacy.
4. The 48 hour reports referenced in your letter which were not timely filed were due to the information not being received by us until after the 48-hour period. However, as soon as we received the expenditure information, we did file the 48-hour reports immediately, even though we were late. (Please note that during the year, we have filed 60 of the 48 or 24 hour reports, so our intention has always been to comply with the requirements).
5. According to our records, the two payments to Richard Norman referenced in your item #5 WERE disclosed on Schedule E. If we disclosed two expenditures of the same amount on the 48-hour notices, then we over-reported the expenditures on the 48-hour notices. However, our records show that Schedule E reports the correct amounts. Please contact Barry Garcia at (949) 496-6363 to discuss this further if your records still show a discrepancy.
