

ETEXT ATTACHMENT

To: Ms. Maureen Benitz
Federal Election Commission / *Reports Analysis Division*

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Re: April 2006 Quarterly Report for VETPAC
I.D. No. C00396820

2007 JAN -3 A 9:48

From: E. Cooper Brown
VETPAC Treasurer

January 2, 2007

2703968208
This submission responds to your correspondence dated November 29, 2006 requesting clarification of certain information provided with VETPAC's April 2006 Quarterly Report, request for clarification of certain expenditures identified in Schedule B:

Regarding concern #1, expenditures for 'Catering for Fundraiser', 'Catering Services for Fundraiser', 'Food/Catering Services' and 'Rental of Site for Fundraiser' --

(A) The identified expenditures were made in conjunction with and exclusively for a fundraiser raising funds for VETPAC;

(B) No portion of the identified expenditures were made on behalf of any federal candidate.

Regarding concern #2, expenditure for 'Brochure Printing' --

(A) The identified expenditure was made in conjunction with and exclusively for a fundraiser raising funds for VETPAC;

(B) No portion of the identified expenditure was made for public communications and/or voter drive activity containing express advocacy as defined under 11 CFR 100.22.





FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

November 29, 2006

E Cooper Brown, Treasurer
Veterans' Alliance For Security And Democracy
Political Action Committee (VETPAC)
P.O. Box 65871
Washington, DC 20035

Response Due Date:
January 2, 2007

Identification Number: C00396820

Reference: April Quarterly Report (1/1/06-3/31/06)

Dear Mr. Brown:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **An adequate response must be received at the Commission by the response date noted above.** An itemization of the information needed follows:

-Please clarify all expenditures made for "CATERING FOR FUNDRAISER," "CATERING SERVICES FOR FUNDRAISER," "FOOD/CATERING SERVICES" and "RENTAL OF SITE FOR FUNDRAISER" on Schedule B. If a portion or all of these expenditures were made on behalf of specifically identified federal candidates, this amount should be disclosed on Schedules B or E supporting Lines 23 or 24 and include the amount, name, address and office sought by each candidate. 11 CFR §§104.3(b) and 106.1

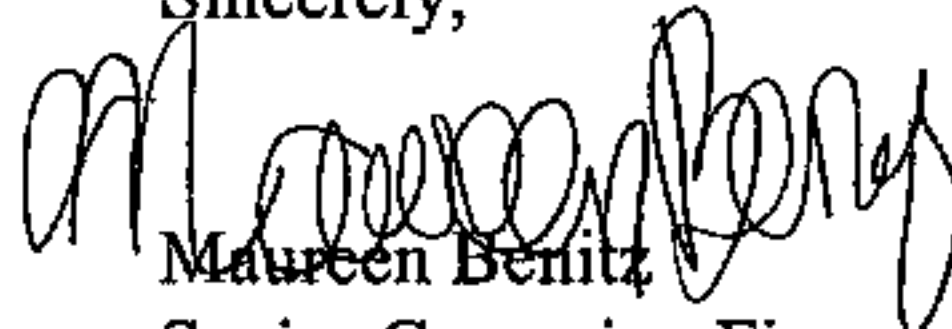
-Schedule B discloses an expenditure(s) for "BROCHURE PRINTING." If a portion or all of these expenditures were for public communications (as defined by 11 CFR §100.26) and voter drive activity (under 11 CFR §106.6(b)(2)(i)) containing express advocacy as defined under 11 CFR §100.22, this would constitute an in-kind contribution or an independent expenditure and should be properly disclosed on a Schedule B or E supporting Line 23 or 24 as appropriate. Public communications and voter drive activity that refer to a clearly identified Federal candidate, but that do not expressly advocate the election or defeat of that candidate should be reported on Schedule B for Line 21(b) of the Detailed Summary Page. Please clarify whether this activity contained express advocacy and amend your report to properly disclose this activity, if necessary.

27039682004

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. **Requests for extensions of time in which to respond will not be considered.** Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694- 1135.

Sincerely,



Maureen Benitz

Senior Campaign Finance Analyst
Reports Analysis Division

27039323085

Federal Election Commission
ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS
 The FEC added this page to the end of this filing to indicate how it was received.

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SL
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