

May 28, 2010

Ms. Nicole Della Rocco  
Senior Campaign Finance Analyst  
Reports Analysis Division  
Federal Election Commission  
Washington, D.C. 20463

Identification Number: C00096156

Reference: March Monthly Report (03/1/10-03/31/10)  
Honeywell International Political Action Committee (HIPAC)

Dear Ms. Della Rocco:

This letter responds to your Request for Additional Information (RAI) dated April 23, 2010 asking for clarification about the "Account Adjustment" disclosed on our report. Recently, we conducted a voluntary internal audit in connection with the transition of our PAC to a new vendor to ensure that the bank balance and the FEC balance reconciled. Following the completion of the review, we filed amended reports to disclose new information (primarily previously unreported bank service charges). Additionally, we disclosed the one-time reconciling adjustment to the account of \$4,293.11 which you have questioned. The transaction represents the difference between the reconciled bank balance and the FEC report balance from before 2007. We have no reason to believe, however, that the funds stem from impermissible sources.

Please note that we filed our amended reports and the adjustment on the March Monthly Report as soon as possible following the completion of the audit in order to reflect the new information as we know it for the public record. Our new vendor will work in coordination with HIPAC to audit and maintain a reconciled bank balance on a monthly basis, and we believe we have established better practices for future recordkeeping and disclosure.

I trust that this serves as an adequate response to your request. If you have any further questions, please feel free to contact me.

Sincerely,

Jason Clifford  
Treasurer  
Honeywell International Political Action Committee (HIPAC)

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