

This letter responds to Ms. Laura Sinram s letter dated January 28, 2009 requesting additional information covering the amended October Quarterly Report (7/1/08-9/30/08. Following is our response:

1. The Schedule E total of \$556,587.71 for the quarter represents independent expenditures in support of John McCain; during that quarter, the committee only made expenditures to support McCain, which is why the number is \$556,587.71. However, the calendar year-to-date TOTALS include expenditures to oppose Hillary Clinton and Barack Obama, which were included in prior reports, but not on this quarterly report. For the entire year-to-date, the total independent expenditures through 9/30/2008 did total \$647,117.71, which consists of \$556,587.71 for McCain, \$18,701.73 to oppose Obama (included in prior report), and \$71,828.27 to oppose Clinton (also noted in prior report).

2. Please note that the independent expenditures that were filed late, they were filed late because of time required for data processing by the escrow agent for the fundraiser and the committee. However, all the expenditures referred were filed on 48 hour reports:

The expenditures on July 1st and July 3rd were included on a 48 hour report filed on July 12, 2008

The expenditures from July 7th through July 17th were included on a 48 hour report on July 23rd.

The final two were under the \$10,000 limit, but when the combined expenditures totaled \$10,000, these two items were timely included on a 48 hour report file on Sept 3, 2008, which is when the cumulative total exceeded \$10,000.

Please note that as soon as we receive the information, we record and filed the reports (as noted above).

For the year 2008, we filed 24 separate 48 hour/24 hour reports, so as you can see, our intention is to comply with the FEC requirements, and we never intentionally fail to disclose the expenditures.
