

November 2, 2007

Jennifer Thangavelu  
Senior Campaign Finance Analyst  
Reports Analysis Division  
Federal Elections Commission  
Washington, D.C. 20463

Re: Balch & Bingham LLP Federal Political Committee  
Identification Number C00358440  
Mid-Year Report - Disclosure of Administrative Expenses

Dear Ms. Thangavelu:

Balch & Bingham LLP Federal Political Committee (B&B PAC) received your letter dated October 10, 2007 stating that our Mid-Year Report covering the period 1/1/07-6/30/07 "discloses no payments for administrative expenses".

After a careful review of our report and the information contained therein B&B PAC did indeed fully and properly disclose administrative expenses totaling \$214.20 for the reporting period. A review of Line 21.b "Operating Expenditures, Other Federal Operating Expenditures" verifies this fact.

The total administrative expenses B&B PAC reported and paid during the reporting period 1/1/07-6/30/07 is clearly listed on Line 21.b for \$214.20. The itemized expenses are as follows:

\$55.26 - Year to Date Administrative Expenses paid to Balch & Bingham LLP law firm

\$53.94 - Expense to re-order checks made payable to Wachovia Bank

\$105.00- Three Stop Check fees of \$35 each (total of \$105.00) paid to Wachovia Bank for previous contributions made but never deposited by Duncan Hunter for Congress campaign committee for \$1,000, Jon Kyl for US Senate for \$1,000 and Senate Victory Fund PAC for \$5,000. B&B PAC further disclosed these stop payment checks by properly reporting and correcting the status of these earlier contributions by listing them as negative disbursements to the respective campaign committees and PACs listed above in the disbursement section of our report.

We cannot explain why the FECfile software did not itemized these administrative expenses as they were properly entered into the FECfile software and list them individually in the disbursement section of the report. However, the facts are clear that the total amount of administrative expenses paid for the reporting period was fully and properly reported and clearly visible in the summary section of the report in Line 21.b. The online report accessible at fec.gov for B&B PAC as well the original printed copy of the report made at the time we filed with the FEC both list the administrative expenses your letter states were not disclosed.

Please advise if there is some other action we can take or if there is some function of the software that will correct this to the satisfaction of the Federal Elections Committee to avoid this confusion in the future.

I trust that this letter has been sufficiently responsive in satisfying the question raised in your letter regarding disclosure of administrative expenses. We will be pleased to answer any additional questions you may have or provide any additional information you may need.

I can be reached at 202.661.6346.

Sincerely,

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**ETEXT ATTACHMENT**

Bill Stiers  
Treasurer  
Balch & Bingham Federal Political Committee