ETEXT ATTACHMENT

12/13/2004 18 : 20

In response to your letter dated November 12, 2004 regarding the September Monthly Report (8/1/04-8/31/04) please note that a full amendment has been filed with the Commission to correct the signature issue on Schedule E Independent Expenditures. The election designation has also been included as they had been dropped in a computer software error. Also, please note that in the amendment you will see that "Debt Retirement" has been added in the purpose of the contributions itemized on Schedule B supporting Line 23 for candidates Kobach and Walcher.

You have stated that the Committee made a contribution to candidate Fitzpatrick in Pennsylvania after the primary date that was disclosed as a primary contribution. In July 2004, the candidate who won the primary for the Republican nomination in Pennsylvania's eighth district dropped out of the race. A convention was held to select a new candidate. The Commission recognized this convention as the primary for that district and a new limit applies. The convention was held after the contribution, so the report reflects the correct election designation.

You have stated that the Committee made both Independent Expenditures and in-kind contributions for the same candidates during the reporting period. The Committee is permitted to make these contributions as long as it follows rules laid out by the Commission regarding non-coordination of Independent Expenditures. The Committee follows those rules completely as described in an earlier response on this issue and so the in-kind contributions are permissible under the law (see McConnell Vs FEC).

You have asked for clarification regarding expenditures made and itemized with the purpose "Phone Banks", "Postage", and "Printing." These expendiutres are made for communications sent out by and for the benefit of the Committee and not on behalf of any specific candidate. The report correctly reflects the schedule and supporting line for these disbursements.