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AKIN, GUMP, STRAUSS, HAUER & FELD, L.L.P.
CIVIC ACTION COMMITTEE

1333 NEW HAMPSHIRE AVENUE, NW, SUITE 400 · WASHINGTON, DC 20036

August 6, 2009

Kristin DeCarmin
Senior Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Identification Number: C00104901

Reference: Your letter dated July 29, 2009, concerning April Monthly Report (3/1/09-3/31/09)

Dear Kristin:

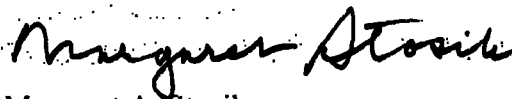
This is in reply to your letter dated July 29, 2009, concerning our April Monthly Report (3/1/09-3/31/09) with regard to administrative expenses.

Our PAC's administrative expenses are regularly disclosed with two separate line 21 entries, one for disbursements and one for fees. The "disbursement" entry reflects expenditures for postage, photocopies, telephone calls, messenger service, supplies, etc. The "fees" entry reflects payment for time spent administering the PAC.

Although there are small variations in PAC activity from month to month, administrative costs have remained about the same, and have all been disclosed.

I hope this adequately answers your inquiry. Please let me know if you have any questions or want further clarification.

Sincerely,



Margaret A. Stosik
Assistant Treasurer
202-887-4117
mstosik@akingump.com

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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July 29, 2009

Joel Jankowsky, Treasurer
Akin, Gump, Strauss, Hauer & Feld LLP Civic
Action Committee (aka AGSH&F Civic Action Committ
1333 New Hampshire Ave, NW Ste. 400
Washington, DC 20036

Response Due Date:
September 2, 2009

Identification Number: C00104901

Reference: April Monthly Report (3/1/09-3/31/09)

Dear Treasurer:

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. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following item:

-Your Amended February Monthly (1/1/09-1/31/09), received 3/9/09, March Monthly (2/1/09-2/28/09), and April Monthly (3/1/09-3/31/09) Reports combined, disclose limited payments for administrative expenses. Administrative expenses are payments made for the purpose of operating a political committee including, but not limited to, rent, utilities, salaries, telephone service, office equipment and supplies. Any such payments to a person aggregating in excess of \$200 in a calendar year must be disclosed on Schedule(s) B supporting Line 21(b) of the Detailed Summary Page. 2 U.S.C. §434(b)(5) If these expenses are being paid by a connected organization, your Statement of Organization must be amended to reflect this relationship. 2 U.S.C. §433(b)(2) In addition, if expenses have been incurred but not paid in a reporting period, the activity should be disclosed as a debt on Schedule D, if the obligation is \$500 or more, or outstanding for sixty days or more. 11 CFR §104.11

Any goods or services provided to your committee by a person, except volunteer activity (i.e., a person's time), would be considered an in-kind contribution from that person, and would be subject to the disclosure requirements of 2 U.S.C. §434(b)(3) and 11 CFR §104.13, and the

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limitations and prohibitions of 2 U.S.C. §§441a and 441b. Payments to a consulting, law or accounting firm will be considered acceptable for salary.

Clarification regarding administrative expenses should be disclosed during each two-year election cycle beginning with the first report filed in the non-election year. Please verify that all expenses referenced above (i.e., rent, salaries, utilities, etc.) have been adequately disclosed. If volunteers have provided these services, please confirm this in writing.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. 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. **Requests for extensions of time in which to respond will not be considered.**

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) 694-1153.


Sincerely,

Kristin DeCarmin

Kristin DeCarmin
Senior Campaign Finance Analyst
Reports Analysis Division

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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PREPARER
(3/2005)

8/10/09
DATE PREPARED

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