

April 8, 2007

Kristin DeCarmine  
Campaign Finance Analyst  
Federal Election Commission  
999 E Street NW  
Washington, DC 20463

Identification Number: C00403022, The Commonwealth PAC

Reference: Year End Report (11/28/06 - 12/131/06)

Dear Ms. DeCarmine:

This letter is written in response to the Federal Election Commission ("Commission") Request for Additional Information ("RFI") regarding the Commonwealth PAC's ("PAC") Year End Report. The PAC is filing an amended Year End report to accompany this letter. The errors in the report were inadvertent and have been fixed. This letter explains the actions taken by the PAC to correct the issues raised in the Commission's letter.

The totals listed on Lines 6(c), 7, 11(a)(i), 11(a)(iii), 11(d), 19, 20, 21(b), 21(c), 31 and 32 have been corrected on the amended report.

The following donors have been issued a contribution refund from the PAC:

Ursala Wagstaff-Kuster	Refunded \$5,000 contribution given on 12/22/06
Kendall Hales	Refunded \$1,000 contribution given on 12/15/06
Fred Carpenter	Refunded \$1,000 of a \$5,000 contribution given on 12/22/06
Dieter Kuster	Refunded \$5,000 contribution given on 12/22/06

The refund checks to the above individuals were mailed by the PAC on April 8, 2007. Copies of the refund checks have been sent to the FEC via mail. These refunded contributions will be reported on the PAC's next report to the Commission.

Although all PAC solicitations have contained the required "clear and conspicuous" request for contributor information as required by 11 CFR 104.7(b)(1), at the time the Year End Report was filed the PAC had not received all of the required identification information for all individuals who contributed over \$200 to the PAC. Since the report was filed, the PAC has followed-up with these individuals who failed to provide the required information. The PAC is filing an amended report today that includes this additional information.

All of the disbursements reported on Schedule B Line 21(b) for "Fundraising Consulting," "Pro-Rated Catering," "Pro-Rated Catering and Room Rental," "Pro-Rated Event Catering," "Pro-Rated Event Expense," "Pro-Rated Fundraising Awards," "Pro-Rated Fundraising Consulting" and "Pro-Rated Fundraising Development" were made for Commonwealth PAC related events and meetings. None of these disbursements were made on behalf or for the benefit of any specifically identified federal candidate or candidates.

All of the disbursements reported on Schedule B Line 21(b) for "Pro-Rated Communications Consulting," "Pro-Rated Printing," "Pro-Rated Photographer," "Pro-Rated Photography" and "Pro-Rated Printing for Event Invite" were for Commonwealth PAC related activities. None of these activities were made on behalf of a specifically identified federal

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**ETEXT ATTACHMENT**

candidate or candidates. Furthermore, none of the expenditures were made for public communications (as defined by 11 CFR 100.26) or for voter drive activity (under 11 CFR 106.6(b)(2)(i)) containing express advocacy as defined under 11 CFR 100.22. Neither did any of the aforementioned expenditures consist of public communications or voter drive activity that referred to a clearly identified federal candidate or candidates, but did not expressly advocate the election or defeat of the federal candidate or candidates.

If the Commission requires any further clarification or filings on these matters, please let me know.

Sincerely,

Audrey Perry  
Commonwealth PAC Treasurer

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