

December 7, 2006

Federal Election Commission
Washington D.C. 20463

RE: VGM Management PAC C00402545

Ladies and Gentlemen of the FEC:

This letter is in response to the FEC letter to VGM Management PAC (C00402545) dated November 17, 2006. That letter noted that VGMPAC had received contributions from two individuals in excess of the allowable amounts in 2nd quarter 2006. We subsequently returned the excess portion of the contributions to the individuals and reported that on our October quarterly filing. We believe that as a result of the refunds, we are now in compliance, both in terms of amount accepted and reporting. However, we acknowledge that we did accept the excess contributions in violation of FEC rules.

We changed a few of our processes internally to mitigate the likelihood we will accept excess contributions or make excess contributions to candidates in the future. We will continue to attempt to learn and understand all the FEC rules relating to PACs and to ensure we comply with the rules going forward.

Sincerely,
Mike Mallaro, Treasurer
