

12/04/2006 18:01

December 4, 2006

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

Dear Ms. DeCarmine:

This letter is filed in response to the Commission's November 3, 2006 inquiry regarding The Commonwealth PAC's (C00403022) 2006 October Third Quarterly Report (07/1/06 - 09/30/06). The response has been split into two separate letters; this letter answers the Commission's first inquiry.

The Commission asked for additional information and descriptions for itemized disbursements reported on Schedule B Lines(s) 21(b) made for: "Pro-Rated Consulting," "Consulting" and "Pro-Rated Fundraising Development."

The disbursements on Schedule B Line 21(b) to Capital Campaigns for Pro-Rated Consulting made on 07/11/06, 07/19/06, 08/01/06, 09/19/06, and 09/19/06 were for Commonwealth PAC related fundraising consulting. These disbursements were not made for the benefit of any federal candidate(s).

The disbursements on Schedule B Line 21(b) to Rainmaker Sport and Entertainment, LLC for Pro-Rated Consulting made on 08/08/06 and 08/19/06 were for Commonwealth PAC fundraising consulting. These disbursements were not made for the benefit of any federal candidate(s).

The disbursement on Schedule B Line 21(b) to Media Forum Inc. for pro-rated fundraising development made on 09/05/06 was for Commonwealth PAC related fundraising development. This disbursement was not made for the benefit of any federal candidate(s).

The disbursement on Schedule B Line 21(b) to Doug Gamble for Pro-Rated Consultant Fees made on 09/05/06 was for Political Consulting.

The disbursements on Schedule B Line 21(b) to Big Cottonwood Group, Inc. for Pro-Rated Consulting made on 07/19/06, 08/01/06, and 09/12/06 were for Commonwealth PAC related Fundraising Consulting. These disbursements were not made for the benefit of any federal candidate(s).

The disbursements on Schedule B Line 21(b) to Theikos, Inc. for Pro-Rated Consulting made on 08/22/06 and 09/05/06 were for Commonwealth PAC related Technology Consulting. This disbursement was not made for the benefit of any federal candidate(s).

The disbursements on Schedule B Line 21(b) to SJZ LLC for Pro-Rated Consulting made on 07/11/06, 08/16/06, 09/05/06, and 09/12/06 were for Commonwealth PAC related fundraising consulting. These disbursements were not made for the benefit of any federal candidate(s).

The disbursement on Schedule B Line 21(b) to Beth Myers for Pro-Rated Consulting made on 09/12/06 was for Political Consulting.

The disbursements on Schedule B Line 21(b) to Mr. Steve Roche for Consulting made on 08/01/06, 08/08/06, and 09/05/06 were for Fundraising Consulting. This disbursement was not made for the benefit of any federal candidate(s).

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The disbursement on Schedule B Line 21(b) to Don Stirling for Pro-Rated Consulting made on 08/08/06 was for Commonwealth PAC fundraising consulting. This disbursement was not made for the benefit of any federal candidate(s).

The disbursements on Schedule B Line 21(b) to Dan Taggart for Pro-Rated Consulting made on 08/16/06, 09/12/06, and 09/19/06 were for Commonwealth PAC related technology consulting. This disbursement was not made for the benefit of any federal candidate(s).

The disbursements on Schedule B Line 21(b) to Julie Teer for Pro-Rated Consulting made on 07/06/06, 07/19/06, 08/16/06, and 09/12/06 were for Political Consulting.

We apologize for these inadvertent errors on the report and will take steps to ensure such errors are not repeated. If the Commission requires any further clarification or filings on these matters, please contact Jessica Peterson at 617-720-5950 x228 or Tim Jost at 617-720-5950 x241.

Sincerely,

Jessica Peterson Commonwealth PAC Treasurer