

Freedom First PAC, FEC ID # C00467688 PO Box 9190 St. Paul, MN 55109-0190

May 24, 2011

Ms. Ashley A. Carter Campaign Finance Analyst Reports and Analysis Division Federal Election Commission Washington, DC 20463

Dear Ms. Carter:

This letter is a follow-up response to our phone conversation concerning my May 17 RFAI letter response to the in-kind question regarding Freedom First PAC's 2010 Year-end Report (11/23-12/31/2010). You asked me to identify some of the vendors and dates involved with the in-kind contributions. As we discussed, you will not be able to trace dollars directly from the in-kind contributions to the vendor expense because the in-kind contributions included multi-purpose trips where expenses were allocated between various campaign committees depending on the number of events and types of expense.

The expenses associated with Susana Martinez for Governor and Texans for Rick Perry occurred during an October 26-27, 2010 multi-purpose trip from Minneapolis to Dallas to San Antonio to Albuquerque (NM) and back to Minneapolis. The flight vendors included American, Delta, and Southwest Airlines as well as one night stay at the San Antonio Airport Doubletree Hotel.

The expenses associated with the Georgia Republican Senatorial Trust occurred during an October 28-29, 2010 multi-purpose trip from Minneapolis to Atlanta to New Orleans to Reading (PA) to Dayton (OH) and back to Minneapolis. The flight vendor allocated to the Trust was Delta Airlines.

If you have further questions or require additional detail, please don't hesitate to contact me at 952-212-0228.

Sincerely,

Don Stiles Treasurer, Freedom First PAC