

In response to your letter dated June 4, 2008, we are providing the following additional information and/or clarification.

- (1) America's Foundation received payments from Conrad Direct, Inc. for list rental services, and these payments did not exceed the "usual and normal charge" for these services. We assessed the usual and normal charge for these services by comparing the amounts received to previous amounts America's Foundation has either researched, or been charged to purchase or rent lists from Conrad Direct, Inc. and other list brokerage firms the PAC has used.
- (2) All expenditures made for "Compensation for Fundraising Svcs" were for fundraising services provided to America's Foundation.
- (3) None of the expenditures listed on Schedule B were for public communications or voter drive activity that contained express advocacy.
- (4) America's Foundation paid Barna Advisory Services to administer the PAC. The firm's fees include the normal administrative expenses to which your letter refers.

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