

March 30, 2007

Federal Election Commission
999 E Street, NW.
Washington, D.C. 20463

ID Number: C00387126

Reference: October Quarterly Report (6/29/06-9/30/06)

To Whom It May Concern:

We are in receipt of the Commission's above referenced letter. Please see below for our complete response.

We are aware of the contribution limits that are in place and we have systems to monitor our committee's acceptance of these funds. For the donor in question, our software failed to catch the fact that this donor had exceeded her limit. This is because her \$1350 contribution was an in-kind donation. We realize that a contribution can be anything of value including goods and services. Practically though, within our software, they are treated differently (they have different transaction types) and this fact led to the failure of the warning to initiate. We will refund \$250 immediately and mail a copy of this check via USPS to the Commission to be included with this response.

All contributions counted for the primary election were made during the primary election. Almost all of the contributions in question were received through the mail. We keep on file the envelopes that have the postmarks that permit us to accept these contributions. The reported date is generally the deposit date which can be several days later.

The last minute contribution in question was actually a contribution that was eligible to be presumptively redesignated. We did this and, for some reason, our software only pulled one of the two entries and therefore only half of the contribution was reported as a 48 hour notice. We realize the importance of reporting all of these last minute contributions and take great steps to do so. In this case, due to the redesignation, only half of the total contribution was reported. We have evaluated the situation and have taken steps to review our records going forward to avoid a repeat.

Thank you for the opportunity to respond, we trust that this completes the public record.

Sincerely,

Westmoreland for Congress
