

July 13, 2008

Corbin T. Jones
Senior Campaign Finance Analyst
Report Analysis Division
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

Identification Number: C00003418

Reference: Amended June Monthly Report (5/01/08 5/31/08)

Dear Mr. Jones:

This correspondence is in response to your Request for Additional Information (RFAI) for the above referenced report.

Regarding contributions which appear to exceed the Federal limits, we have refunded all of those funds. The report has been amended with a note included in the memo field of each of the contributions in question to describe the month of the refund and to whom the refund was sent. We have mailed a photocopy of each of the refund checks to the FEC for each item where the refund memo had not previously been included in our report.

Lorillard Tobacco Company Public Affairs Committee is a registered PAC. As such this contribution is reported correctly. Additional information has been included with the report to more clearly identify the committee in question.

Regarding the reporting of contributions of an LLC treated as a partnership, we continue to accurately disclose donor information to the best of our ability. The specific contribution in question was collected by an affiliated committee who like ourselves endeavors to collect the complete information from their donors in a timely fashion. As of the time of the original filing of this report, the partner allocation of this contribution had not been resolved and passed on to our reporting department. We have now collected the information and have amended our report.

Our ongoing research matches contributions whose name and address information has inconsistent or varied information with the actual givers. Giver records are corrected by this research. When this information identifies inappropriate contributions, refunds are processed in a timely manor. Each of the specific contributors mentioned in your letter have been addressed in this manor. We have mailed a photocopy of each of the refund checks to the FEC for each item where the refund memo had not previously been included in our report.

It is our intention to disclose complete and accurate information to FEC. We are happy to comply with your request to add additional notes to our report to aid the FEC in verifying the accuracy of our data. The specific relation between the memo items and the transfer records in question is included in the required FEC data format and was reported with our original filing. We have amended our report in support of your request to see this information in a memo format.

The report has been amended. I trust this response answers your inquiry. If you need further clarification please do not hesitate to contact me.

Sincerely,

Pat Huyck

Image# 28932436342

ETEXT ATTACHMENT

Director of Accounting
