

ETEXT ATTACHMENT

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September 13, 2004

Maureen Benitz
Reports Analysis Division
Federal Election Commission
999 E Street NW
Washington, D.C. 20463

Ref.: C00253906: July Quarterly Report (4/1/04-6/30/04)

Dear Ms. Benitz:

Please refer to your letter of September 1, 2004.

Your letter correctly notes that we failed to file the required notice for a \$10,000 independent expenditure within the required 24-hour time period. Our committee rarely makes independent expenditures, "last minute" or otherwise. We were therefore unaware of the 24-hour reporting requirement. We realized our error during the preparation of the July Quarterly Report and filed the required notice at that time.

Your letter asks us to clarify our expenditures for "direct mail operations," "printing," and "direct mail printing." These expenditures related to raising funds, candidate education and information requests, and general correspondence. None of these expenditures were made on behalf of specifically identified federal candidates. In researching these expenditures, we discovered that a \$5,580.69 payment to "Zip Mailing" on April 12, 2004 was incorrectly classified as "direct mail printing" when it should have been classified as "direct mail postage." We are filing an amended report to correct the classification.

Your letter asks us to verify that all administrative expenses have been adequately disclosed. After reviewing the expenses of operating the committee, we continue to believe that all such expenses have been adequately disclosed. The activities of the committee consist almost entirely of using direct mail solicitation to raise funds from individuals thought to be interested in immigration reform and donating those funds to the campaigns of federal candidates who support immigration reform. Our committee relies heavily on volunteers, does not maintain an office, and does not have a listed telephone. Our administrative expenses are almost entirely the costs of mailings and payments to independent contractors for clerical and mail-related work that cannot be performed by volunteers.

Very truly yours,

William W. Chip
Treasurer