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Corbin T. Jones
Senior Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
Washington, DC 20463

Dear Corbin:

I am in receipt of your letter dated April 23, 2008 concerning two issues on our March Monthly Report.

Your first issue concerns certain payments to other political committees for goods and/or services. In our March Monthly Report, there were two expenditures to political committees.

One was to NAFCU/PAC for food and beverages at a Victory NOW PAC fundraiser on February 28, 2008 in a suite at the Verizon Center. We were informed in a letter mailed to us by the Director of Political Affairs of NAFCU/PAC that NAFCU/PAC paid the cost (\$2066.80) of the food and beverages. As such, NAFCU/PAC was considering this payment to be an in-kind contribution to Victory NOW PAC. The in-kind contribution was listed on page 8 of our March Monthly Report under Itemized Receipts with the notation "In-Kind: Food and Beverages at Fundraiser". The disbursement was listed on page 10 of the report, but due to a glitch in the software, it did not include a reference to its in-kind nature. I have amended my March Monthly Report to add the notation "In-Kind Received" after the NAFCU/PAC disbursement. Because the in-kind disbursement to NAFCU/PAC was equal to the actual amount that NAFCU/PAC was charged by the Verizon Center for the food and beverages, we do not believe the disbursement amount is below the usual and normal charge.

In addition, Victory NOW PAC made a disbursement to another political committee, RADPAC, for the use of their suite at the Verizon Center during the NCAA Tournament for a Victory NOW PAC fundraiser. This disbursement was made outright to RADPAC to reimburse them for the use of their suite, and did not involve an in-kind contribution. Further, the amount of the disbursement -- \$5250 -- was equal to the actual amount the Verizon Center charged RADPAC for the use of that suite, so it too represented the "usual and normal charge".

In each case, the political committee receiving reimbursement (in-kind or otherwise) confirmed to me the actual cost of food and beverages in the first instance, and the actual cost for use of a suite in the second instance. Please let me know if I should be doing additional due diligence when making payments of this type.

Your second issue also concerns the \$5250 expenditure made to RADPAC for the "Rental of Space for Fundraiser". You ask if all or a portion of this expenditure was made on behalf of specifically identified candidates. The answer is no. In the past year, Victory NOW PAC has made contributions to over 65 different candidates. Each fundraiser raises funds that are deposited in one account and then disbursed to a wide variety of federal candidates. There was nothing different about the nature of this particular fundraiser.

As always, please feel free to call me if you have any questions at all. Thanks.

Very truly yours,

Jennifer Lewis Smith

Treasurer

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