

April 17, 2008

Mr. Michael H. Hartsock  
Federal Election Commission  
Reports Analysis Division  
999 E Street, NW  
Washington, DC 20463

Re: Request for Additional Information (Amended Year-End Report, 7/01 - 12/31/2007)

Dear Mr. Hartsock:

This is in response to the Federal Election Commission's analysis of Americans Against Illegal Immigration's Amended Year-End 2007 FEC Disclosure Report and your request for additional information concerning that report.

The report discloses payments from Omega List Company on Line 17 that your letter stated "appear to be for goods or services provided by the committee" and you question whether the committee assessed the usual and normal charge.

The payments received from Omega List Company and reported on Line 17 of Schedule A as "List Rental Income" is a common receipt for committee's engaged in direct mail fundraising. Just as this committee must rent lists to prospect for new donors; it rents its list to other groups for the same purpose. The rates charged by List Brokers (in this case, Omega List Company) are standard in the industry and therefore meet the test for "usual and normal" charges.

Disbursements reported on Schedule B as expenditures for "Media - Fundraising", "Postage", and "Printing & Copies" were all made on behalf of Americans Against Illegal Immigration's internal fundraising efforts. No part of these expenditures were for public communications (as defined by 11 CFR 100.26) or voter drive activity (under 11 CFR 106.6(b)(2)(i)) containing express advocacy as defined under 11 CFR 100.22; therefore they do not constitute an in-kind contribution nor an independent expenditure and were properly reported as Federal Operating Expenditures on line 21(b).

The disbursements classified as "Media - Fundraising" were made for the production of a short video clip to be made a part of the committee's website and used to promote the organization and its fundraising efforts. Other disbursements for "Postage" and "Printing" relate to efforts by the committee to raise funds on its behalf. The majority of the funds raised are through its national direct mail fundraising efforts.

I trust that this response will satisfy the Commissions request for additional information. Please contact me should you require anything further.

Sincerely,

Scott B. Mackenzie  
Treasurer