

We are writing in response to the series of letters 21st Century Democrats has received regarding our FEC report filings for the months of June, July, August and September 2009.

We have taken a systemic approach to addressing the issues raised and have filed amended reports for these months in advance of filing our October report. In the interest of ensuring our compliance, we will respond to each point in your letters with explanations and/or corrections we have made.

Letter dated September 29, 2009, regarding the June Monthly Report (5/1/09 ? 5/31/09).

1. Total lines 11(a)(i) and 11(a)(ii), Column B of the Detailed Summary page. After going through all the reports and correcting any discrepancies identified relating to contributions, these totals were recalculated during the amendment process and checked from one report to the next from June through October.
2. Schedule H1. All reports from June through October were verified to ensure the inclusion of the Schedule H1.
3. Schedule disclosure of Harris Direct. We were notified of this issue several months ago and have ensured the accurate reflection of our debt to Harris Direct on the amended reports.

Letter dated September 29, 2009, regarding the July Monthly Report (6/1/09 ? 6/30/09).

1. Total lines 11(a)(i) and 11(a)(ii), Column B of the Detailed Summary page. After going through all the reports and correcting any discrepancies identified relating to contributions, these totals were recalculated during the amendment process and checked from one report to the next from June through October.
2. Descriptions of itemized disbursements on Schedule(s) B and H4. Greater clarification has been provided relating to the descriptions of these disbursements. The words ?see memo? were only used when we had an ?umbrella payment? for which there were discrete transactions, and those discrete transactions did have detailed descriptions of disbursements.
3. Schedule H4 identification of original vendors for ?umbrella payments? such as expense reimbursements. All payments to the original vendors have been itemized as memo entries for such disbursements in the amended reports and in the October report filing.
4. Schedule H4 itemization and identification of original vendors for travel and subsistence advances or reimbursements. All payments to original vendors have been itemized as memo entries for travel related reimbursements in the amended reports and in the October report filing.
5. Schedule H4 expenditure classifications. All disbursements identified in reports from June through September, and in the October report filing, were closely scrutinized to ensure compliance with the rules for federal and non-federal fund allocations. We identified errors where descriptions of some expenditures were inaccurate and were corrected. We also identified errors where certain disbursements were not allocable even though they were classified as allocable, and some where disbursements were allocable but had not been classified as such. We corrected all errors relating to allocable disbursements, ensuring that the actual allocations made based on these classifications were still accurate. Fortunately, the transactions in error had not been included in the allocations used to transfer funds from our non-federal accounts to our federal account. It should also be noted that none of the activities related to these expenditures were for ?expressed advocacy? of a specific Federal candidate or election.
6. Schedule H4 expenditures for ?Reimbursement for Catering Costs.? This disbursement was misclassified as an allocable expense, it was corrected, and, again, this expenditure had not been included in the allocation used to transfer funds from our non-federal accounts to our federal account. It should also be noted that none of the activities related to these expenditures were for ?expressed advocacy? of a specific Federal candidate or election.
7. Schedule B expenditures made for ?catering.? None of these catering expenses were made on behalf of a specifically identified Federal candidate or election.
8. Classification of Schedule B expenditures. None of the identified expenditures for Direct Mail, Postage, Telemarketing, Annual Dinner Printing, or Telemarketing Callers were on behalf of a specifically identified Federal candidate or election.

\*\*\*\*\*

Letter dated October 21, 2009, regarding the Amended August Monthly Report (7/1/09 ? 7/31/09).

1. Descriptions of itemized disbursements on Schedule(s) B and H4. Greater clarification has been provided relating to the descriptions of these disbursements. The words "see memo" were only used when we had an "umbrella payment" for which there were discrete transactions, and those discrete transactions did have detailed descriptions of disbursements.

Letter dated October 21, 2009, regarding the September Monthly Report (8/1/09 ? 8/31/09).

1. Descriptions of itemized disbursements on Schedule(s) B and H4. Greater clarification has been provided relating to the descriptions of these disbursements. The words "see memo" were only used when we had an "umbrella payment" for which there were discrete transactions, and those discrete transactions did have detailed descriptions of disbursements.

Please let us know if there are any additional questions or clarifications required to resolve these matters.

\*\*\*\*\*