

To: Ryan Lanz  
Campaign Finance Analyst  
Reports Analysis Division

Re: FEC Letter dated July 28, 2006

The administrative expenses reported on the July 2006 Monthly Report represent the expenses incurred by Nixon Peabody on behalf of the PAC from January through June, 2006. After reading your letter, it appears these expenses should have been reported on a more frequent basis. Starting with the report that is due in September, our intent is to report these expenses on a monthly basis. September's report will include administrative expenses incurred through August 31 (beginning with the time period subsequent to the July report). Subsequent reports will include the administrative expenses for the month they were incurred.

We regret the error and hope you will be patient with us as we attempt to comply with the FEC Rules and Regulations. Please advise us if this solution is satisfactory or if we will need to amend the returns for the months in question.

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