

November 2, 2007  
Jennifer Thangavelu  
Senior Campaign Finance Analyst  
Reports Analysis Division  
Federal Elections Commission  
Washington, D.C. 20463

Re: Balch & Bingham LLP Federal Political Committee  
Identification Number C00358440  
Mid-Year Report - Disclosure of Administrative Expenses

Dear Ms. Thangavelu:

Balch & Bingham LLP Federal Political Committee (B&B PAC) received your letter dated October 10, 2007 stating that our Mid-Year Report covering the period 1/1/07-6/30/07 "discloses no payments for administrative expenses" on Line 21(b) of the Detailed Summary Page.

We have reviewed our Mid-Year Report that was electronically filed with the Commission on July 19, 2007, and find that B&B PAC did disclose on Line 21(b) expenditures totaling \$214.20 for the reporting period. As you know, Line 21(b) of the Detailed Summary Page is merely the total of the expenses listed in this category and that in generating this summary, a filer lists the individual expenses in Line 21(b) of the FEC's software program. In preparing our Mid-Year Report, B&B PAC listed the following three itemized administrative expenses in Line 21(b):

\$55.26 - Year to Date Administrative Expenses paid to Balch & Bingham LLP law firm  
\$53.94 - Expense to re-order checks made payable to Wachovia Bank  
\$105.00- Three Stop Check fees of \$35 each (total of \$105.00) paid to Wachovia Bank for previous  
contributions made but never deposited by Duncan Hunter for Congress campaign committee for \$1,000, Jon Kyl for  
US Senate for \$1,000 and Senate Victory Fund PAC for \$5,000. B&B PAC further disclosed these stop  
payment checks by properly reporting and correcting the status of these earlier contributions by listing them  
as negative disbursements to the respective campaign committees and PACs listed above in the  
disbursement section of our report.

The total of these three expense items is \$214.20, which is the total that appears in Line 21(b) of our Detailed Summary Page. Since our administrative expenses did not exceed more than \$200 for any one particular vendor, there would be no itemized listing of these expenses in Schedule B Itemized Disbursement section of the Mid-Year 2007 report. In any event, B&B PAC did fully and properly enter the administrative expense items for the reporting period, and, as can be seen in our online report accessible at [www.fec.gov](http://www.fec.gov), the total of these expenses is disclosed in Line 21(b). Please advise if there is some other action we can take in the future to ensure that the information disclosed in Line 21(b) is itemized in the Schedule B Itemized Disbursements section of our reports or if there is some function of the software that will correct this to the satisfaction of the Federal Elections Commission to avoid this confusion in the future.

I trust that this letter has been sufficiently responsive in satisfying the question raised in your letter regarding disclosure of administrative expenses. We will be pleased to answer any additional questions you may have or provide any additional information you may need.

I can be reached at 202.661.6346.

Sincerely,

Bill Stiers  
Treasurer  
Balch & Bingham Federal Political Committee

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