

SUMMIT PAC



PO Box 15858 • Washington, DC 20003

March 30, 2007

Christopher J. Morse
Federal Election Commission
Senior Campaign Finance Analyst
Reports Analysis Division
999 H Street, NW,
Washington, DC 20463

Dear Mr. Morse:

This correspondence pertains to the Commission's inquiry dated March 2, 2007 regarding Summit PAC's Year End Report covering the period of 11/28/06 thru 12/31/06. As the Commission's correspondence references, Schedule B supporting Line 23 of that report discloses one or more to a candidate for the 2006 General election; however, the funds were disbursed after the election date.

The contribution was intended to reduce that candidate committee's debts incurred during the 2006 election campaign. The apparently impermissible contribution in question by the Commission was incorrectly disclosed by Summit PAC and should have been designated for debt retirement. That 2006 Year End report has been amended and that contribution now indicates "debt retirement" along with the year of the election.

I am hopeful that Summit PAC's acknowledgement and correction of this error satisfies the Commission's inquiry and does not result in any enforcement action.

Please don't hesitate to contact Summit PAC at (202) 486-6873, should you have any additional questions or concerns.

Respectfully Yours,

John D. Hardesty
Treasurer

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
FEBRUARY 28 2007

RQ-2

March 2, 2007

John Douglas Hardesty Jr., Treasurer
Summit PAC
P.O. Box 15858
Washington, DC 20003

**Response Due Date:
April 2, 2007**

Identification Number: C00382333

Reference: Year End Report (11/28/06-12/31/06)

Dear Mr. Hardesty:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **An adequate response must be received at the Commission by the response date noted above.** An itemization of the information needed follows:

-Schedule B supporting Line 23 of your report discloses one or more contributions to a candidate(s) for the **2006 General** election; however, the funds were disbursed after the election date(s) (see attached). Please note that contributions may not be designated for an election which has already occurred unless the funds are to be used to reduce a candidate committee's debts incurred during that election campaign.

If any apparently impermissible contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If the contribution(s) in question should have been designated for debt retirement, you should amend your report to indicate "debt retirement," along with the year of election.

If you have made an impermissible contribution, you must request a refund or provide a written authorization for a redesignation of the contribution pursuant to 11 CFR §110.2(b) within 60 days of the treasurer's receipt.

If the foregoing conditions for redesignations were not met within 60 days of the treasurer's receipt, your committee must obtain a refund.

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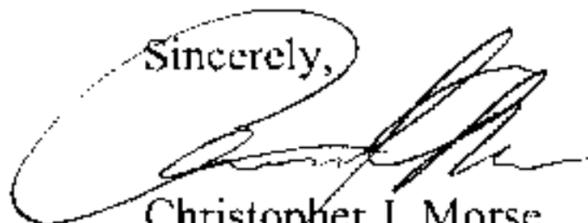
Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund or redesignation request sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. 11 CFR §110.1(b)

Although the Commission may take further legal action regarding this impermissible activity, your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. **Requests for extensions of time in which to respond will not be considered.** Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1133.

Sincerely,



Christopher J. Morse
Senior Campaign Finance Analyst
Reports Analysis Division

Recipient Name	Date	Amount	Election	Election State - Date
Circo Rodriguez for Congress	12/06/06	\$5,000	General	TX - 11/07/06

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Federal Election Commission
ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS
 The FEC added this page to the end of this filing to indicate how it was received.

<input checked="" type="checkbox"/> Hand Delivered	Date of Receipt <i>4/2/07</i>
<input type="checkbox"/> USPS First Class Mail	Postmarked
<input type="checkbox"/> USPS Registered/Certified	Postmarked (R/C)
<input type="checkbox"/> USPS Priority Mail	Postmarked
Delivery Confirmation™ or Signature Confirmation™ Label <input type="checkbox"/>	
<input type="checkbox"/> USPS Express Mail	Postmarked
<input type="checkbox"/> Postmark Illegible	
<input type="checkbox"/> No Postmark	
<input type="checkbox"/> Overnight Delivery Service (Specify):	Shipping Date
Next Business Day Delivery <input type="checkbox"/>	
<input type="checkbox"/> Received from House Records & Registration Office	Date of Receipt
<input type="checkbox"/> Received from Senate Public Records Office	Date of Receipt
<input type="checkbox"/> Received from Electronic Filing Office	Date of Receipt
<input type="checkbox"/> Other (Specify):	Date of Receipt or Postmarked

JH
 PREPARER

4/2/07
 DATE PREPARED

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