

ETEXT ATTACHMENT

01/10/2005 16 : 54

Mr. Christopher J. Morse
Campaign Finance Analyst
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: HillPAC C00363994
October Monthly Report (9/01/04-9/30/04)

Dear Mr. Morse:

This letter is in response to your December 10, 2004 request for information concerning the Purpose of Disbursement description for certain expenditures itemized on HillPAC's October 2004 Monthly Report covering the period from September 1 through September 30, 2004.

The Commission's regulations provide examples of statements or descriptions which meet the purpose disclosure requirements, as follows: "dinner expenses, media, salary, polling, travel, party fees, phone banks, travel expenses, travel expense reimbursement, and catering costs." 11 C.F.R. Section 104.3(b)(3)(i)(B). Examples of statements or descriptions which do not meet the requirements include: "advance, election day expenses, other expenses, expenses, expense reimbursement, miscellaneous, outside services, get-out-the-vote and voter registration." 11 C.F.R. Section 104.3(b)(3)(i)(B).

You asked for a clarification for the following Purpose of Disbursement descriptions:

Report Page	Full Name	Purpose of Disbursement
Line 21b, p.29	Postmaster	Direct Mail
Line 21b, p.29	Postmaster	Direct Mail
Line 21b, p.37	Washington Intelligence Bureau	Direct Mail
Line 21b, p.37	Washington Intelligence Bureau	Direct Mail
Sched. D, p.42	O'Brien McConnell & Pearson	Direct Mail

The purpose of disbursement description "Direct Mail" meets the Commission's regulations and falls squarely within the examples provided which include "media", "polling", "phone banks", "travel", and "party fees". Nevertheless, you requested clarification for the "Direct Mail" expenditures and we are once again pleased to provide it for you.

HillPAC paid the U.S. Postmaster rental fees for post office boxes that are used to receive direct mail contributions from donors.

HillPAC paid Washington Intelligence Bureau a fee for postage that was affixed or printed on envelopes which contained printed direct mail solicitations for contributions to the committee. In October 2004, you asked for clarification of a disbursement to Washington Intelligence Bureau that was described as "Postage" on the Committee's August monthly report. The Committee advised you in a letter dated November 5, 2004 that the disbursement was for postage that was affixed or printed on direct mail solicitations. We believe that either description, "Postage" or "Direct Mail," accurately describes the purpose of these disbursements to Washington Intelligence Bureau because the disbursement is postage for direct mail solicitations. Please let us know at your earliest convenience which you prefer or if there is another two-word description for these disbursements that you would like the Committee to use so that we can avoid the unnecessary costs and time involved in responding to you regarding these disbursements to Washington Intelligence Bureau.

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As we advised you in a letter dated November 19, 2004 in response to your request for clarification regarding disbursements to this vendor, over the past four years, HillPAC has regularly paid a direct mail fundraising firm, O'Brien McConnell & Pearson, for services it provides to HillPAC which included: direct mail consulting fees, mailing list rental fees for direct mail solicitations, printing costs for direct mail solicitations, and production costs for direct mail solicitations.

HillPAC was organized in January 2001 and over the years has filed at least thirteen (13) FEC reports with more than 45 itemized disbursements to O'Brien McConnell & Pearson for which the "Direct Mail" purpose description was used. See FEC Reports Year End 2001, April Monthly 2002, May Monthly 2002, August Monthly 2002, October Monthly 2002, Post-Special 2002, Year End 2002, February Monthly 2003, Mid-Year 2003, Year End 2003, March Monthly 2004, April Monthly 2004, and June Monthly 2004. The FEC did not raise one question regarding these disbursement purpose descriptions.

The "Direct Mail" expenditures were made for HillPAC and were properly described and reported. No portion of these expenditures were made on behalf of specifically identified federal candidates. If they had been, HillPAC would have disclosed them as such on Schedules B or E supporting lines 23 or 24 pursuant to 11 C.F.R. Section 106.1.

Thank you for the opportunity to clarify the expenditure purpose description for you on the October Monthly 2004 report. Please let us know at your earliest convenience if you have additional questions or do not find this response to your December 10, 2004 letter adequate.

Again, we would greatly appreciate it if you would send us the two-word purpose description that you would like the Committee to use for any future payments to Washington Intelligence Bureau.

Sincerely,

James Lamb
Counsel, HillPAC