

October 5, 2007

Ms. Jennifer Thangavelu  
Reports Analysis Division  
Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

Identification Number: C00399196

RE: Mid-Year Report (01/01/07 - 06/30/07)

Dear Ms. Thangavelu:

This submission is in response to your review of the above referenced report.

The disbursements for Catering, Event Management Fee, Facility Rental, Facility Usage-Golf, Fundraising Consulting, In-kind-Facility Rental, In-kind - Catering, and Fundraising Event Supplies are operating expenses in support of the Committee's own fundraising efforts and the services provided were not made on behalf of or attributable to a federal candidate.

The disbursements for Printing are also for the Committee's own fundraising efforts and do not contain express advocacy.

Please contact me if you require additional information.

Sincerely,

John Clyburn  
Treasurer

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