

December 10, 2007

Ms. Sui Lang Panoke
Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E St., NW
Washington, DC 20463

RE: FEC RFAI Dated 11/7/2007

Dear Ms. Panoke:

This filing responds to your letter of November 7, 2007, requesting additional information about Vote Hope's 2007 Mid-Year Report. I will address each of your concerns in order, below.

1. The 48-Hour Notice for the expenditure you listed has now been filed. Had we realized that the FEC expects these reports to be filed in non-election years, we would naturally have filed this notice more timely, but we're still not entirely clear what the Commission's regulations and guidance require. Specifically, the regulation that requires 48-Hour reports reads, in meaningful part:

Political committees must report on Schedule E of FEC Form 3X all independent expenditures aggregating \$10,000 or more **with respect to a given election anytime during the calendar year up to and including the 20th day before an election.**

11 C.F.R. 104.4(b)(2) (emphasis added). Even after consulting with outside counsel, it was not at all clear to us whether the "during the calendar year" reference in this text applies to both the aggregation of the independent expenditures and the "given election," or just the independent expenditures. In other words, since for us there is no "given election anytime during the calendar year" in which the expenditures were made, we concluded that no 48-Hour report was required under the regulation.

Moreover, our interpretation is supported by the Commission's written guidance. We consulted the FEC's 2007 chart for 48-Hour reporting here: http://www.fec.gov/info/charts_ie_dates_special.shtml, and the chart for 2008 elections here: http://www.fec.gov/info/charts_ie_dates_pres.shtml.

Notice that on the 2007 chart, the only elections listed are special elections, but more importantly, on the 2008 chart notice that the entry for the "48-Hour Notice Period" for the 2008 California presidential primary reads "01/01/08 01/16/08". Again, in light of the omission of all but special elections from the 2007 chart, the 01/01/08 date listed as the opening of the 48-Hour Notice period in the chart for the 2008 California primary, and the indefinite grammatical structure of the regulation itself, we believe our interpretation is at least reasonable. Regardless, we have filed 48-Hour Notices for our off-year independent expenditures, and will continue to do so as Vote Hope goes forward in future election cycles.

2. As a non-connected PAC, Vote Hope pays all its own administrative expenses. Our Mid-Year Report disclosed several payments for salaries and rent, and the market value rent we are paying includes the use of office equipment and utilities. In short, the PAC is paying its administrative expenses as they arise and itemizing and allocating those payments as required.

3. We have amended our mid-year report to clarify that all the independent expenditures disclosed in that report were

ETEXT ATTACHMENT

for the California primary.

We trust this adequately addresses your questions and concerns, but should you have any further questions or need any additional information please contact me at your earliest convenience.

Sincerely,

Lisa Le, Treasurer
Vote Hope
