

To: Ms. Maureen Benitz  
Federal Election Commission

Re: VETPAC October 2006 Quarterly Report  
I.D. No. C00396820

From: E. Cooper Brown  
VETPAC Treasurer

January 2, 2007

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This responds to your correspondence dated November 29, 2006 concerning certain information contained in VETPAC's October 2006 Quarterly Report:

In response to concern #1, full identification of contributing individuals, the information has been provided on amended Quarterly Report.

In response to concern #2, clarification of all expenditures made for 'fundraising brochure reproduction costs' and 'fundraising event costs' --

(A) The expenditures in question were made in conjunction with and for a fundraiser whose sole purpose was to raise funds for VETPAC;

(B) None of the expenditures in question were made on behalf of any federal candidates.

The descriptive information on the October Quarterly Report, Schedule B, as amended, has been modified to clarify the the purpose of the expenditures consistent with this explanation.

In response to concern #3, clarification of expenditure for 'media consulting services' --

(A) The expenditure in question was made in conjunction with and for a fundraiser whose sole purpose was to raise funds for VETPAC;

(B) No portion of this expenditure was for public communications or voter drive activity containing express advocacy as defined under 11 CFR 100.22.

The descriptive information on the October Quarterly Report, Schedule B, as amended, has been modified to clarify the the purpose of the expenditures consistent with this explanation.

In response to concern #4, clarification of administrative expenses --

(A) VETPAC is a fully volunteer organization. Accordingly, all services rendered for the purpose of administering and operating VETPAC have been rendered by volunteers. No individuals have been paid for such services by VETPAC, nor by a connected organization (of which there are none);

(B) All administrative expenses incurred for the reporting period (e.g. rent, utilities, office equipment, supplies) have been fully disclosed in the October 2006 Quarterly Report.