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Mr. Brian Bennett
Federal Election Commission
999 E Street
Washington, D.C. 20463

ID 300442624
RE: 2007 Year End Report

Dear Mr. Bennett:

This is in response to your letter of June 13. In the first paragraph there is reference to 11 CFR Sec. 100.24 regarding "a district committee making expenditures and disbursements in connection with both federal and non-federal elections for activities that are not federal election activities---"

The 1st Congressional District Committee of Virginia did not make any "expenditures and disbursements in **connection with both federal and non-federal election activities**" either in the period

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covered by the 2007 Year End Report and amendment or at any other time. The disbursements reported on the Year End Report of 2007 were 1st CD operating expenses or reimbursements to local committees for their operating expenses. In other words, **all** expenditures and disbursements made by the 1st CD covered in the 2007 Year End Report and amendment have been in connection with a local convention and operating expenses and are exempt from the FEC definition of expenditure; thus do not fall under 11 CFR Sec. 100.24.

Further, In the *Political Party Committees* under Who Must Allocate, the operative language is, "District committees that have established a nonfederal account **may** allocate certain expenses between their federal and non-federal accounts." The 1st CD has chosen not to allocate such expenses between federal and non-federal accounts.

The second paragraph notes that a district committee "may pay administrative, generic voter drive and exempt activity expenses from their federal account or allocate between their federal and non-federal accounts." Again, the 1st CD has chosen not to allocate such expenses between federal and non-federal accounts and so has not filed Schedule H1. Thus, the 1st CD is in compliance with 11 CFR Sec. 106.7(c)(2).

The second paragraph also makes reference to "activity directly attributable to a clearly identified candidate." The 1st CD had no such expenses related to a "clearly identified candidate" for any

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office, local, state or federal during the period covered by the 2007 Year End Report and amendment. Thus the 1st CD is also in compliance with the referenced section as well in this regard.

The third paragraph makes reference to Schedule H2 in reporting the "allocation ratios of their joint federal and non-federal fundraising events and direct candidate support programs." The 1st CD has no such activities. It has made no expenditures on behalf of both federal and non-federal candidates at any time.

Currently the 1st CD has not established procedures to pay for allocable expenses. We assert that we have no allocable obligations.

Furthermore, as of the end of April, 2008, we are no longer using the account we had mistakenly established as a federal account. However we will continue to submit monthly reports showing no activity.

Yours truly,



Janet A. Jackson, Treasurer
1st Congressional District Committee

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