

The Freedom Project

"COMMITTED TO A BETTER AMERICA BASED UPON INDIVIDUAL FREEDOMS
AND OPPORTUNITIES, EMPOWERED CITIZENS AND PERSONAL RESPONSIBILITY"

RECEIVED
FEDERAL ELECTION
COMMISSION MAIL ROOM

MAY 7 17 25 PM '98

CONGRESSMAN JOHN BOEHNER, HONORARY CHAIRMAN
CHAIRMAN, HOUSE REPUBLICAN CONFERENCE

May 4, 1998

Mr. John D. Gibson
Assistant Staff Director
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, D.C. 20463

Re: The Freedom Project (C00305805) 1997 Mid-Year Report

Dear Mr. Gibson,

The Freedom Project has reviewed your letter dated March 26, 1998, which was a follow-up to Edward Ryan's letter dated March 4, 1998 and is filing an amendment to its 1997 Mid-Year Report in the form of this letter. We wish to again note, however, that The Freedom Project did not receive these letters from the Federal Election Commission. Rather, a committee staffer discovered copies of these letters via the Internet.

Each specific question identified in your March 26, 1998 letter is addressed below. However, as that letter notes, The Freedom Project filed an amendment to its 1997 Mid-Year Report on February 20, 1998, prior to the issuance of the two letters. The February 20 amendment addressed many of the issues raised in the letters.

1. First, you ask that the committee clarify all expenditures made for fundraising on Schedule B and explain that if a portion or all of the expenditures were made on behalf of specifically identified federal candidates then the amount should be disclosed on Schedule B or E supporting line 23 or 24. The Committee's February 20 amendment moved all expenditures for candidate contributions which had previously been identified on line 21 to line 23 as requested. All other expenditures identified as "Fundraising Cost" were not candidate contributions, but rather were expenses of fundraising on behalf of the Committee itself as a nonconnected committee.

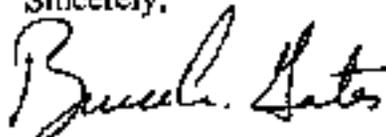
2. Second, you ask that the Committee clarify its description of expenditures as "Services Rendered." Each expenditure to Arent Fox Kinter Plotkin & Kahn identified on page 2 for line 21 was for legal services and each expenditure to Teton Strategies on page 3 for line 21 was for consulting services.

3. Last, you state that the Committee's report discloses payments made to credit card companies for purchases of items or services which do not correlate with the memo entries that are provided to identify the original vendors. You ask that the Committee provide an attribution between the monthly credit card payment and the identification of the original vendors. There are two sets of credit card payments identified on the Committee's amended reports. There are no memo entries corresponding to either the January or March Monthly payments on page 5 of 8 for line 21b. The memo entries which correlate to the April Monthly payment on page 5 of 8 for line 21b can be found on page 7 of 8, blocks A and B. The memo entries which correlate to the May Monthly payment found on page 5 of 8 for line 21b can be found on page 7 of 8 blocks C, D, E and G. Please note also that the dates on the entries found on blocks D and E should read 5/15/97 rather than 3/4/97. Finally, the memo entries which correlate to the 6/13/97 payment on page 5 of 8 for line 21b can be found on page 7 of 8, block I, and page 8 of 8 blocks, B, C and D. Expenditures to vendors which aggregated under \$200 were not separately itemized as memo entries.

In addition, the memo entries which correlate to the March Monthly payment on page 2 of 4 for line 23 can be found on page 3 of 4 for line 23 block A. The memo entries which correlate to the April Monthly payment on page 2 of 4 for line 23 can be found on page 3 of 4 for line 23, block B, and page 4 of 4, block E. The memo entries which correlate to the May Monthly payment on page 2 of 4 for line 23 can be found on page 3 of 4 for line 23, block D, and page 4 of 4, block H. The memo entries which correlate to the June Monthly payment on page 2 of 4 for line 23 can be found on page 3 of 4 for line 23, blocks E, G, H, I, and page 4 of 4, blocks A, F, and G.

We trust that this responds to each of your remaining issues.

Sincerely,



Bruce Gates
Treasurer

Federal Election Commission

**ENVELOPE REPLACEMENT PAGE
FOR INCOMING DOCUMENTS**

The Commission has added this page to the end of this filing to indicate how it was received.

<input type="checkbox"/> Hand Delivered	Date of Receipt
<input checked="" type="checkbox"/> First Class Mail	POSTMARKED 5-4-98
<input type="checkbox"/> Registered/Certified Mail	POSTMARKED
<input type="checkbox"/> No Postmark	
<input type="checkbox"/> Postmark Illegible	
<input type="checkbox"/> Received from the House office of Records and Registration	Date of Receipt
<input type="checkbox"/> Received from the Senate Office of Public Records	Date of Receipt
<input type="checkbox"/> Other (Specify):	Postmarked _____ and/or Date of Receipt
<input type="checkbox"/> Electronic Filing	
<i>JCB</i> PREPARER	5-8-98 DATE PREPARED