

# LIBERTY LEAGUE PAC

210 South St., Unit 5-1, Boston MA 02111

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February 26, 2008

Errin D. Larkin  
Campaign Finance Analyst  
Federal Election Commission,  
999 E Street, NW  
Washington, DC 20463

Dear Errin,

Re: Liberty League PAC cash donations

On Feb. 11, 2008, I accepted the position of Treasurer for the Liberty League PAC CO0442038, and sent an FEC Form 1 amending the Statement of Organization by certified mail on Feb. 20. I understand that it was delivered to you on Monday Feb 24.

As the new treasurer, I decided to acquaint myself with FEC guidelines governing nonconnected committees, as well as looking at the committee's finances by reviewing the transactions made to date, along with the FEC Form 3X filed at the December 2007 year-end. In the course of this informal audit, I came across the following in the FEC campaign finance guidelines:

In addition to any other recordkeeping requirements, committees must retain a full-size photocopy or digital image of the check for any contribution over \$50. 102.9(a)(4).

Accordingly I searched in committee files for copies of contribution checks deposited. The committee had been unaware of this copying requirement and had not kept these copies, so I approached the Citizens Bank, which is the PAC's

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banker, to get copies of contribution checks from the bank's records. Over the course of two days, Feb 25 and Feb 26, they supplied me with these copies but told me to my surprise today that two deposits in excess of \$100, each attributable to single contributors, had been made in the form of cash deposits.

The first was a deposit on December 13, 2007 of \$1,400.00 attributable 100% to Steven Young of 339 College Rd, Wolfeboro, NH 03894. (The year-end FEC Form 3X discloses this contribution.)

The second was a deposit on December 14, 2007 of \$500.00 attributable 100% to Amir Hirsch of 28 Holton St, Allston, MA 02134. (The year-end FEC Form 3X discloses this contribution.)

As I understand it, FEC rules allow a maximum of \$100.00 in the form of cash. All larger contributions need to be in the form of a check or other written instrument. FEC rules further prescribe the refund of any cash contribution in excess of \$100.00 to the person making the contribution.

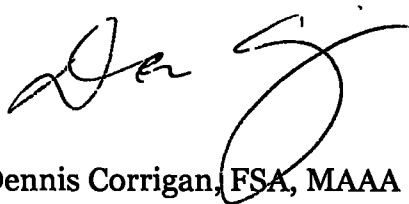
I am attempting to ensure compliance now with the spirit of the regulations and accordingly I wanted to let you know that on discovering the above discrepancy, I have today prepared two checks - one for \$1,300.00 to Steven Young of 339 College Rd, Wolfeboro, NH 03894, and one for \$400.00 to Amir Hirsch of 28 Holton St, Allston, MA 02134.

Tomorrow I will mail the first of these and hand-deliver the second of these.

Naturally I will disclose these refunds in the first quarter report. If necessary I will also refile the first quarter report modified as you may recommend.

Thanks in advance for your assistance and forbearance in this matter.

Sincerely yours,




R. Dennis Corrigan, FSA, MAAA  
Treasurer,  
Liberty League PAC

cc Corrie Whalen, Chairman, Liberty League PAC  
Robert H French, Assistant Treasurer, Liberty League PAC

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Federal Election Commission  
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