

ETEXT ATTACHMENT

06/06/2002 17:18

June 6, 2002

Brandy Phillips
Reports Analyst
Federal Election Commission
999 E St., NW
Washington, DC 20463

Identification Number: C00307405

Reference: Amended 12 Day Pre-Special Report (11/6/01-11/28/01), filed 3/26/02

This letter is in response to your request for additional information, dated May 22, 2002 and received by the Keep Our Majority PAC on May 24, 2002.

Your letter indicates that this report discloses \$16,350.73 in transfers from the non-federal account for joint activity for the reporting period. However, the report discloses only \$635.98 as the non-federal share for the joint activity for the reporting period.

Your letter inaccurately states that the \$16,350.73 in transfers from the non-federal account for joint activity was for THIS reporting period. As you further note in your letter, transfers for shared activity must occur within a 70-day time period: no more than 10 days before or 60 days after the payment to the vendor.

This reporting period was only 23 days of activity. The transfers from the non-federal account are made for payments to vendors from PREVIOUS reporting periods, but still well within the 60 days after the actual payments to the vendors were made. It is inaccurate to state that transfers made from the non-federal account for joint activity always equal the actual non-federal share of disbursements disclosed in any single reporting period.

These transfers were NOT prohibited activities, no transfers back to the non-federal account are required, and no further action by the Commission is warranted.

Your letter further states that Schedule H2 indicates that the Committee participated in "9/10/01 Event" activities or events during the reporting period, but there are no corresponding disbursements on Schedule H4. However, if you will notice, Schedule H3 indicates a transfer from the non-federal account for the "9/10/01 Event." Because activity for the "9/10/01 Event" was disclosed on this report, Schedule H2 disclosed the federal/non-federal percentage share for this fundraising event.

No amendments are required at this time.

Sincerely,

Lisa R. Lisker
Assistant Treasurer