

March 5, 2007

Ms. Laura E. Sinram
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Re: Amended October Monthly Report (9/1/06 - 9/30/06), received 12/7/06

Dear Ms. Sinram:

The Commission's preliminary review of the report referenced above raised questions concerning certain information contained in the report. We have addressed the questions below:

- 1) Schedule D - To disclose as a memo entry on Schedule A supporting line 11(a)(i) of the Detailed Summary Page debt owed to an individual for travel and non-travel that was not reimbursed within 30 days after payment by cash or personal check, or 60 days after the closing date of the billing statement on which credit card charges first appear.
- 2) Schedule B, Line 30(b) - During July, August, September, and October 2006, no employee devoted more than 25% of their time during a month on activities in connection with a Federal election.
- 3) Schedule H4 - The payment(s) for 'photo (walkpiece),' 'art/design (walkpiece),' 'printing (walkpiece),' and 'translation (walkpiece)' do not meet the definition of Federal Election Activity. Please refer to Federal Election Commission Advisory Opinion 2006-19.
- 4) Schedule H3 - See Amendment e-filed 3/5/2007. Disclosed transfer(s) for inkind corporate contribution(s) from the non-federal account to the federal account on Schedule H3.
- 5) Schedule H4 - The sum of the memo entries that support payment(s) to credit cards companies as well as reimbursements to individuals are correct. See amendment e-filed 1/17/2007.
- 6) Schedule H4 - The expenditures made for 'campaign consultant (non-employee),' 'campaign consultant (non-employee), travel,' 'facility rental' are not made on behalf of specifically identified federal candidates and are not associated with fundraising activity. This is not Federal Election Activity.

If you have any questions regarding this matter, please do not hesitate to call me at (916)442-5707.

Sincerely,

Katherine Moret
Treasurer

cc:K.Bowler, Executive Director
L. Olson, Legal Counsel
