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March 18, 2008

Michael H. Hartsock Reports Analysis Division **Federal Election Commission** Washington, DC 20463

Identification Number:

C00401224

Reference:

Year-End Report (12/01/07 - 12/31/07)

Dear Mr. Hartsock:

We are in receipt of your letter dated March 5, 2008 concerning our Year End Report for 2007. In your letter, you requested additional information regarding two concerns: in-kind contributions and a description for an itemized disbursement.

With regard to the in-kind contributions, this was simply a reporting error caused by a recent switch to new reporting software. None of the contributions reported during this period were actually in-kind contributions. We have filed an amended report which corrects this error and reports the contributions correctly as monetary contributions. The amended report also includes a clarified description of the disbursement formerly described only as "Consulting: Political" which your letter identified as insufficient. We are confident that the revised description will satisfy your request.

Although it was not a part of your letter, I would like to take this opportunity to inform you that our report covering January 1, 2008 to January 31, 2008 suffered from the same software-generated in-kind reporting error. We have already submitted an amended report for that period as well.

I trust that the corrections made on our amended Year End Report fully address the concerns raised in your letter. If for any reason you require further additional information, please do not hesitate to contact me by phone at (617) 517-7636 or by email at steve@actblue.com.

Sincerely,

Steven Gold **Staff Counsel**

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