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August 8, 2008

VIA OVERNIGHT DELIVERY

Ms. Nicole Della Rocco
Campaign Finance Analyst
Federal Elections Commission
999 E. Street, NW
Washington, DC 20463

RE: WomenCount PAC (ID# C00450098) June Monthly Report

Dear Ms. Rocco:

This letter responds to the Federal Election Commission ("FEC") notice dated July 11, 2008 requesting additional information relating to our client WomenCount PAC's June 2008 monthly disclosure report. In short, the amended report WomenCount PAC filed with the FEC on July 18, 2008 resolves each of the issues in the notice.

1. The FEC notice asks whether WomenCount PAC filed a 24-hour notice disclosing a last minute expenditure in the amount of \$16,827.67 to The Davis Group in connection with a newspaper advertisement supporting Senator Hillary Clinton's candidacy for President past the applicable deadline. More specifically, the FEC notes that the 24-hour notice was filed on May 19, 2008, while Schedule E of the June monthly report disclosed the same expenditure as taking place on May 16. As explained to you in our telephone conversation last week, this discrepancy was due to an error in the campaign reporting software used to generate the June monthly report. The 24-hour notice correctly disclosed that the expenditure took place on May 19. Schedule E of the June monthly report should have also disclosed the expenditure on May 19, though we have since discovered that the software erroneously changed the date from May 19 to May 16 when it generated the final version on the report; more specifically, when cumulating the aggregate year-to-date total of all expenditures by WomenCount PAC supporting Senator Clinton, including a separate independent expenditure made on May 16, the reporting software for an unknown reason changed the date of the May 19 expenditure to May 16.

Following your advice, WomenCount PAC has filed an amended June monthly report that correctly discloses this expenditure on Schedule E as taking place on May 19.

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2. The FEC notice also requests further information about the \$68,373.53 payment on May 25 to The Davis Group for a New York Times newspaper advertisement supporting Senator Clinton's candidacy. The PAC filed a 24-hour notice disclosing this \$68,374.00 payment on May 26; although it then filed another 24-hour notice for a \$68,373.53 on May 30, the second 24-hour notice filed on May 30 was simply intended to amend the prior notice filed on May 26, to reflect the actual amount of the expenditure. At the time the first 24-hour notice was filed on May 26, the PAC had not received a final invoice from The Davis Group for the advertisement, so it disclosed an "estimated" expenditure of \$68,374; once it received the final invoice on May 30, the PAC promptly filed this amendment to the May 26 notice to reflect the actual amount based on the invoice.

In our telephone conversation, you advised us not to file any future amendments to 24-hour notices, because the FEC software recognizes these as separate notices disclosing separate payments, even when they in fact reflect the same expenditure. Accordingly, Schedule E of the June monthly report correctly discloses a single expenditure in the amount of \$68,373.53 on May 25.

3. The amended June monthly report also provides an election designation for each contribution, as requested in the FEC notice.

Please feel free to contact us with any questions regarding these issues or the amended report filed by WomenCount PAC.

Sincerely,



Kevin Heneghan

cc: Joan Steckler, Treasurer
GC/lc
#1280.02

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Federal Election Commission
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J. M. ...
 PREPARER

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