PO Box 15858 • Washington, DC 20003 (202) 486-6873

April 28, 2008

Christopher J. Morse
Senior Campaign Finance Analyst
Federal Election Commission
Reports Analysis Division
999 E Street, NW,
Washington, DC 20463

Dear Mr. Morse:

APR 28 PH 2: 31

This letter pertains to a notice dated March 28, 2008, in which the Commission requested additional information following its preliminary review of Summit PAC's Year End Report (10/1/07-12/31/07). The Commission's correspondence referenced three items on which additional information is necessary. Supplementary information on those three items is as follows:

- 1. Clarification on all expenditures associated with "Event Party Supplies" iss provided on Schedule B of Summit PAC's AMENDED Year End Report (10/1/07-12/31/07), filed on April 28, 2008. These expenditures were not made on behalf of specifically identified federal candidates, and therefore did not have to be disclosed on Schedules B or E supporting Lines 23 or 24.
- 2. Schedule B of Summit PAC's AMENDED Year End Report (10/1/07-12/31/07), filed on April 28, 2008, discloses additional information on expenditures for "Event Expense: Printing Costs" and "Postage." These expenditures were not for public communications or voter drive activity containing express advocacy. As the AMENDED Year End Report filed on April 28, 2008, now reflects in more detail, both the "Printing Costs" and "Postage" disbursements were for event invitations.
- 3. Summit PAC's AMENDED Year End Report (10/1/07-12/31/07) filed on April 28, 2008, discloses limited payments for administrative expenses. All administrative expenses disclosed are payments made for the purpose of operating a political committee including utilities, salaries, telephone service, office equipment and supplies. No administrative expenses were paid by a connected organization.

However, two expenses paid during the 10/1/07-12/31/07 reporting period and disclosed in Summit PAC's AMENDED Year End Report (10/1/07-12/31/07) filed on April 28, 2008, had been incurred but not paid during previous reporting periods. This activity should have been disclosed as a debt on Schedule D during previous reporting periods, as the obligations were \$500 or more. An expenditure on Summit PAC's AMENDED Year End Report (10/1/07-12/31/07) in the amount of \$1,800 dated 10/18/07, was payment for a debt incurred, but not paid during the 4/1/07-6/30/07 reporting period. That activity is now disclosed as debt on Schedule D of Summit PAC's AMENDED July 2007 Quarterly Report filed on April 28, 2008. An expenditure on Summit

PAC's AMENDED Year End Report (10/1/07-12/31/07) in the amount of \$1,925 dated 10/19/07, was payment for a debt incurred, but not paid during the 7/1/07-9/30/07 reporting period. That activity is now disclosed as debt on Schedule D of Summit PAC's AMENDED October 2007 Quarterly Report filed on April 28, 2008.

No goods or services were provided to Summit PAC by any person, other than volunteer activity, and therefore there were no reportable in-kind contributions. I have verified that the administrative expenses including those for salaries, utilities and office supplies have been properly disclosed.

I am hopeful that the Commission will find the amended reports filed by Summit PAC on April 28, 2008 satisfactory, and that this correspondence fully clarifies those aspects of Summit PAC's financial activity, referenced in the Commission's current inquiry.

Please don't hesitate to contact Summit PAC at (202) 486-6873, should you have any additional questions or concerns.

Most Sincerely,

John D. Hardesty Treasurer

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PREPARER (3/2005)

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