

March 12, 2007

Kristin DeCarmine  
Campaign Finance Analyst  
Federal Election Commission  
999 E Street NW  
Washington, DC 20463

Identification Number: C00403022, The Commonwealth PAC

Reference: 30 Day Post-General Report (10/19/06 - 11/27/06)

Dear Ms. DeCarmine:

This letter is written in response to the Federal Election Commission ("Commission") Request for Additional Information ("RFAI") regarding the Commonwealth PAC's ("PAC") 30 Day Post-General Report.

Although all PAC solicitation have contained the required "clear and conspicuous" request for contributor information as required by 11 CFR 104.7(b)(1), at the time the 12 Day Pre-General Report was filed the PAC had not received all of the required identification information for all individuals who contributed over \$200 to the PAC. Since the report was filed, the PAC has followed-up with these individuals who failed to provide the required information. The PAC is filing an amended report today that includes this additional information.

The PAC has also corrected in the amended report, filed today, an inadvertent administrative disclosure error in its original 30 Day Post-General Report. The PAC did not make an excessive contribution to the Bouchard for US Senate campaign. The PAC made a \$2,000 contribution to Bouchard's primary account on 2/3/2006. The PAC then made a \$5,000 contribution to Bouchard's general account on 8/9/2006, and a \$3,000 contribution to his primary account on 10/27/2006. This was all properly designated on the contributions made to the Bouchard campaign, and was reported as such by Bouchard's committee.

However, the PAC inadvertently and incorrectly reported the \$3,000 contribution made on 10/27/2006 as going to Bouchard's general election account in its 30 Day Post-General Report - this contribution should have been reported as a contribution to Bouchard's primary election account. The PAC is amending the 30 Day Post-General Report today to reflect this change. This amended report is sufficient to resolve this issue because the contribution was given to the primary account, and was reported accordingly by the Bouchard campaign. Therefore, this apparent excessive contribution was a administrative reporting error, and the contribution does not need to be refunded or redesignated.

All of the disbursements reported on Schedule B Line 21(b) for "Pro-Rated Catering," "Pro-Rated Catering and Event Expens," "Pro-Rated Event Expense," "Pro-Rated Event Supplies," Pro-Rated Event Catering" and "Pro-Rated Fundraising Expense" were made for Commonwealth PAC related events and meetings. None of these disbursements were made on behalf or for the benefit of any specifically identified federal candidate or candidates.

All of the disbursements reported on Schedule B Line 21(b) for "Pro-Rated Photographer," "Pro-Rated Printing," and "Pro-Rated Postage" were for Commonwealth PAC related activities. None of these activities were made on behalf of a specifically identified federal candidate or candidates. Furthermore, none of the expenditures were made for public communications (as defined by 11 CFR 100.26) or for voter drive activity (under 11 CFR 106.6(b)(2)(i)) containing express advocacy as defined under 11 CFR 100.22. Neither did any of the aforementioned expenditures consist of public

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**ETEXT ATTACHMENT**

communications or voter drive activity that referred to a clearly identified federal candidate or candidates, but did not expressly advocate the election or defeat of the federal candidate or candidates.

If the Commission requires any further clarification or filings on these matters, please let me know.

Sincerely,

Jessica Peterson  
Commonwealth PAC Treasurer

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