

Virginia Partisans Political Action Committee

P.O. Box 6243
Arlington, Virginia 22206

May 2, 2006

Federal Election Commission
ATTN: Daniel T. Buckley
Campaign Finance Analyst
Reports Analysis Division
999 E Street N.W.
Washington, DC 20463

ID Number: C00299511
Reference: Mid-Year Report (1/1/05-6/30/05)
Your Letter Dated April 26, 2006

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Dear Mr. Buckley,

This is in response to your letter of April 26, 2006, requesting clarification regarding a transfer of funds from our Federal PAC to a non-federal PAC. The issue in question was allocation of any shared expenses between the two accounts.

Please be advised that our Federal PAC and our Virginia PAC do not have any shared expenses.

Based on our telephone conversation of yesterday, I understand that the above paragraph is sufficient to constitute an "adequate response" to your notice. If that is not the case, please let me know and we can provide additional detail to substantiate it.

Sincerely,



Thomas L. Osborne
Treasurer

25039071919

Federal Election Commission
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