

October 3, 2008

Mr. Allan Norfleet  
Campaign Finance Analyst  
Reports Analysis Division  
Federal Election Commission  
999 E Street NW  
Washington DC 20463

Identification Number: C00449280

Dear Mr. Norfleet:

This letter responds to your letter dated September 17, 2008, regarding the July Quarterly Report of Free and Strong America PAC, Inc. Our answers to your inquiries are as follows:

1. Free and Strong America PAC is familiar with the rules governing goods and/or services provided by one committee to another. See 11 CFR 100.52(d)(1). As such, all payments for purchases and rentals were equal to the fair market value and the "usual and normal charge" for such goods and services. To determine the amounts charged to the committee for purchases and rentals from other committees, Free and Strong America PAC consulted with merchants, distributors, and vendors to determine the current market pricing for the goods or services in question. For instance, to calculate the value of donor lists, political list vendors were consulted. To calculate the value of equipment purchases, merchants specializing in such goods were consulted. We are confident that this process led us to paying the "usual and normal charge" for all goods and services purchased from other committees.
2. As you correctly note, on several occasions the committee made expenditures for "catering/facility rental." None of these expenditures were made on behalf of specifically identified federal candidates. All such expenditures were for events raising funds directly for the PAC itself.
3. As you correctly note, on several occasions the committee made expenditures for "printing" and "postage" and "photographs." These expenditures included the following items:
  - The printing of blank letterhead and envelopes.
  - The printing and mailing of thank you notes that did not contain express advocacy as defined under 11 CFR 100.22 or mention Federal candidates.
  - The printing and mailing of PAC fundraising solicitations that did not contain express advocacy as defined under 11 CFR 100.22 or mention Federal candidates.
  - The purchase of photographs depicting the PAC's honorary Chairman, Mitt Romney, for use in PAC fundraising appeals, use on the PAC website, and for other PAC promotional purposes.

Thank you for your assistance on these matters. Please do not hesitate to contact us if you have any questions.

Sincerely,

Darrell Crate  
Treasurer

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