

ETEXT ATTACHMENT

11/14/2005 10 : 56

November 10, 2005

Mr. Christopher J. Morse
Senior Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
Washington, DC 20463

Re: Inquiry regarding the mid-year report of Bluegrass Committee, C00235855

Dear Mr. Morse:

By letter of October 12, 2005, you have inquired about several matters contained in our mid-year (January 1 through June 30, 2005) report. This letter is to respond to those inquiries.

" No portion of the expenditures for food, beverage or catering was made on behalf of specifically identified Federal candidates.

" No portion of the expenditures for printing were for public communications (as defined by 11 CFR 100.26) or voter drive activity (under 11 CFR 106.6(b)(2)(i)) containing express advocacy as defined under 11 CFR 100.22 or referring to a clearly identified Federal candidate.

" Our fundraising consultant, whose fee is disclosed in our filings with the Federal Election Commission, provides administrative services to the Bluegrass Committee as part of her contractual arrangement with the Committee. A monthly fee is paid to her, and she is responsible for paying basic rent and other occupancy costs, basic telephone service, and similar expenses. You will note that our report does disclose other administrative expenditures, including Federal Express, check printing, a data entry assistant, office supplies, and others. No administrative expenses are being paid by a connected organization, and all expenditures have been properly reported.

" No goods or services have been provided by any person without adequate compensation, except for volunteer activity. Thus there is no in-kind contribution that should have been reported on our mid-year report. My services as Treasurer are provided on a volunteer basis.

" In summary, all expenses referenced in your letter of October 12, 2005 (i.e., rent, salaries, utilities, etc.) have been adequately disclosed in our mid-year report.

Please advise if additional information is needed.

Very truly yours,

Larry J. Steinberg
Treasurer