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November 17, 2008

Lauren Lien
Chris Jones
Reports Analysis Division
Federal Election Commission
999 E. Street, NW
Washington, DC 20463

Re: Hillary Clinton for President; FEC ID No. C00431569, August Monthly Report (7/1/08-7/31/08)

Dear Ms. Lien and Mr. Jones,

This is in response to your letter requesting additional information pertaining to the above-listed report of Hillary Clinton for President (the Committee). Where necessary Amendments will be filed to correct or clarify or make any needed changes.

For several of the contributions noted by you, the Committee timely refunded or reattributed the excessive portion of the contribution, i.e., within sixty days, and it is so reported on the Committee's September or October Monthly Reports on Line 28a or as a memo entry on 17a.

In some cases, the Committee found data entry errors as a part of its review, cure and notification process and made the needed corrections. Please note that the Committee continues to work on review and improving our data entry.

A few contributions noted by you will be disclosed as refunded on the Committee's December Monthly Report. Although the Committee is diligent with regards to our review and of tracking excessive contributions these few contributions were inadvertently overlooked. During the Committee's ongoing effort to correctly and accurately aggregate the contributions made by an individual, occasional data entry errors occur upon discovery, the Committee takes immediate action to correct its records and makes every effort to correct the public record.

In the cases of Brown, J the Commission has confused different contributors with the same name.

Please note that the Committee has always intended to fully comply with the sixty day reattribution and redesignation provision. Strict procedures are used by the Committee to ensure that all contributions are handled in a manner in full compliance with this and all other applicable provisions.

You have requested information regarding the Offset from Adventures in Advertising, City of Austin and Interstate Power and Light Co. The refund from Adventures in Advertising was for a payment the Committee made 12/03/07 for \$13,428.96 (the Payee was AIA Corporation). The deposit refund from the City of Austin was for a payment the Committee made 6/2/08 for \$2,180 to the Austin Parks & Recreation Department. Interstate Power and Light Co is a division of Alliant Energy a vendor the Committee made numerous payments to, the Committee's refund was made by the parent company Interstate Power and Light Co.

You have also requested additional information on a few donor refunds. Danihels, M was reported on our Year end, Feb Monthly and June Monthly. Eyer, J contributed on 10/23/2007 contributed \$1000 to the General. The refund made to Sanderson, Stephen 7/15/08 was voided and new check was written 8/28/08 with the correct spelling of his first name Sanderson, Steven. Robinson, P.J. contributed several times in 2008, the only difference in the name of the contributor is the punctuation, the contributions were reported from Robinson, P.J. The Committee will amend to correct the

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aggregation for Stroup, D.

You have also noted that, in some cases, the purposes for the Committee's debts to individuals for travel reimbursements on Schedule D is different from the purposes made for payments to those same individuals on Schedule B. There are two explanations for this. First, the expenditures actually made on Schedule B are, in fact, for different purposes, i.e., different obligations, than the amounts unpaid and owed on Schedule D. However, because it is the same individual who was paid and to whom the debt is owed, the payment is disclosed on Schedule D as a payment this period, even if it was for other purposes. In other words, the Committee may owe a staff member travel reimbursements, which are unpaid and a debt, while at the same time, paying that same person a salary, which is not part of the debt.

Therefore, the purpose of the debt is different than the purpose of the expenditure. The Committee's reporting software automatically aggregates these payments for the this period field on Schedule D. However, the Committee is of the understanding that the Commission is requesting that only payments made to reduce the debt portion be included as payments this period and that other payments to the same creditor be excluded. (RAD referred the Committee to the instructions for Schedule D-P, even though the instructions do not indicate that only payments made to reduce debts be included in the this period field.) Although the Committee believes that this is a change from past Commission requirements, it will seek to have its reporting software changed, so that the information may be separated. However, the Committee is not yet aware whether this change to the reporting software may be able to be effectuated.

The second reason that some of the purposes on Schedule D are different than the expenditure purposes on Schedule B is because the Committee more fully itemizes the purposes for multiple invoices on Schedule B. Whereas the purpose on Schedule D may indicate travel, the full itemization of the multiple expenditures on Schedule B may indicate travel, per diem, meal expense, and office supplies. This is due to the reporting software that the Committee uses for the debt purposes, which does not easily permit disclosure of multiple purposes on the Schedule D. The Committee will seek a correction to its reporting software and will endeavor to amend to clarify additional purposes on the Schedule D. The Committee will file Amendments in the few cases where it is needed to adjust a debt purpose.

With respect to the final item noted by you, when reimbursements to staff for travel have exceeded \$500, the Committee has, in fact, itemized on its Schedule B the related payments from staff to vendors when such payments have exceeded \$200 for the election cycle.

I hope this information is sufficient for your review. However, should you desire any additional information, please contact our Counsel, Eric Kleinfeld, at 202-293-1177.

Sincerely,

Shelly Moskwa
Treasurer, Hillary Clinton for President

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