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November 18, 2004

Mr. Christopher J. Morse
 Campaign Finance Analyst
 Reports Analysis Division
 Federal Election Commission
 999 E Street, N.W.
 Washington, D.C. 20463

Re: HillPAC C00363994
 September Monthly Report (8/01/04-8/31/04)

Dear Mr. Morse:

This letter is in response to your October 20, 2004 request for information concerning the Purpose of Disbursement description for certain expenditures itemized on HillPAC's September 2004 Monthly Report covering the period from August 1 through August 31, 2004.

The Commission's regulations provide examples of statements or descriptions which meet the purpose disclosure requirements, as follows: "dinner expenses, media, salary, polling, travel, party fees, phone banks, travel expenses, travel expense reimbursement, and catering costs." 11 C.F.R. section 104.3(b)(3)(i)(B). Examples of statements or descriptions which do not meet the requirements include: "advance, election day expenses, other expenses, expenses, expense reimbursement, miscellaneous, outside services, get-out-the-vote and voter registration." 11 C.F.R. section 104.3(b)(3)(i)(B).

You asked for a clarification for the following Purpose of Disbursement descriptions:

Report Page	Full Name	Purpose of Disbursement
Line 21b, p.48	O'Brien McConnell & Pearson	Direct Mail
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The purpose of disbursement description "Direct Mail" meets the Commission's regulations and falls squarely within the examples provided which include "media", "polling", "phone banks", "travel", and "party fees." Nevertheless, you requested "clarification" for the "Direct Mail" expenditures and we are pleased to provide it for you.

HillPAC paid a direct mail fundraising firm, O'Brien McConnell & Pearson, for services it provided to HillPAC which included: direct mail consulting fees, mailing list rental fees for direct mail solicitations, printing costs for direct mail solicitations, and production costs for direct mail solicitations. The purpose of these two disbursements to a direct mail firm was properly reported as "Direct Mail."

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HillPAC was organized in January 2001 and over the past three years has filed at least thirteen (13) FEC reports with more than 45 itemized disbursements to O'Brien McConnell & Pearson for which the "Direct Mail" purpose description was used. See FEC Reports Year End 2001, April Monthly 2002, May Monthly 2002, August Monthly 2002, October Monthly 2002, Post-Special 2002, Year End 2002, February Monthly 2003, Mid-Year 2003, Year End 2003, March Monthly 2004, April Monthly 2004, and June Monthly 2004.

The "Direct Mail" expenditures were made for HillPAC and were properly described and reported on Line 21b. No portion of these expenditures were made on behalf of specifically identified federal candidates. If they had been, HillPAC would have disclosed them as such on Schedules B or E supporting lines 23 or 24 pursuant to 11 C.F.R. section 106.1.

Thank you for the opportunity to clarify the expenditure purpose description for you on the September Monthly 2004 report. Please let us know at your earliest convenience if you have additional questions or do not find this response to your October 20, 2004 letter adequate.

Sincerely,

James Lamb
Counsel, HillPAC