

ETEXT ATTACHMENT

11/05/2004 16 : 30

November 5, 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
August Monthly Report (7/01/04-7/31/04)

Dear Mr. Morse:

This letter is in response to your October 6, 2004 request for information concerning the Purpose of Disbursement description for certain expenditures itemized on HillPAC's August 2004 Monthly Report.

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.25	Delancey Printing	Printing
Line 21b, p.41	Postmaster	Postage
Line 21b, p.41	Postmaster	Postage
Line 21b, p. 52	Washington Intelligence Bureau	Postage
Line 21b, p. 52	Washington Intelligence Bureau	Postage

The purpose of disbursement descriptions "printing" and "postage" meet the Commission's regulations and fall squarely within the examples provided which include "media", "polling", "phone banks", "travel", and "party fees." Nevertheless, you requested "clarification" for the "postage" and "printing" expenditures and we are pleased to provide it for you.

HillPAC paid a printer, Delancey Printing, to reproduce in printed form business cards for an employee. The purpose of this disbursement was properly reported as "Printing."

HillPAC paid the U.S. Postmaster a fee for postage stamps that were used by the committee for general office use (e.g. to mail payments for other expenditures which are also itemized on this report) and thank you letters that were sent to HillPAC contributors. HillPAC paid Washington Intelligence Bureau a fee for postage that was affixed or printed on envelopes which contained printed solicitations for contributions to the committee. The purpose of disbursement for these expenditures was properly reported as "Postage."

The "printing" and "postage" 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,

ETEXT ATTACHMENT

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 descriptions for you. Please let us know at your earliest convenience if you have additional questions or do not find this response to your October 6, 2004 letter adequate.

Sincerely,

James Lamb
Counsel, HillPAC