

September 29, 2007

Mr. Michael H. Hartsock
Federal Election Commission
Reports Analysis Division
999 E Street, NW
Washington, DC 20463

Re: Request for Additional Information (Mid-Year Report, 1/01 - 6/30/2007)

Dear Mr. Hartsock:

This is in response to the Federal Election Commission's analysis of Americans Against Illegal Immigration's Mid-Year 2007 FEC Disclosure Report and your request for additional information concerning that report. Your letter raises the following issues:

1. The report discloses payments from Omega List Company on Line 17 that appear to be for goods or services provided by the committee and you question whether the committee assessed the usual and normal charge;
2. Schedule D supporting Line 10 discloses a debt owed to Campaign Funding Direct with a negative balance;
3. The outstanding debt balances from the previous report do not correspond to the opening balances on the current report; and
4. The Commission Regulations require that a committee report the identification of all individuals who contribute in excess of \$200 in a calendar year.

The payments received from Omega List Company and reported on Line 17 of Schedule A as "List Rental Income" is a common receipt for committee's engaged in direct mail fundraising. Just as this committee must rent lists to prospect for new donors; it rents its list to other groups for the same purpose. The rates charged by List Brokers (in this case, Omega List Company) are standard in the industry and therefore meet the test for "usual and normal" charges.

The negative balance reported on Line 10 of Schedule D for Campaign Funding Direct was a direct result of the incorrect opening balance.

The outstanding debt balances have been corrected on an amended Mid-Year Disclosure Report to agree with the closing balances of the previous report (Year End 2006).

Given that the majority of the contributions received are a result of direct mail solicitations and despite the fact that each appeal includes a clear and conspicuous request for the contributor information as well as occupation and employer; many of the donors do not provide that information on the initial request.

Within thirty (30) days of receipt of a contribution, the committee has taken the following steps to satisfy the 'best efforts' requirements: (i) a letter is sent, clearly asking for the missing information, without soliciting a contribution; (ii) the contributor is informed of the requirements of federal law for the reporting of such information; and (iii) a return envelope is provided, as well as a fax number and an email address. Upon receipt of the information the committee amends its reports to provide the newly obtained information.

I trust that this response will satisfy the Commissions request for additional information. Please contact me should

ETEXT ATTACHMENT

you require anything further.

John W. Leuthold

Treasurer
