

# ETEXT ATTACHMENT

[BEGIN TEXT]

December 10, 2002

12/16/2002 15 : 27

Via electronic filing to FEC

Ms. Jane Parks  
Reports Analysis Division  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

Re: HILLPAC (C00363994)  
October Monthly Report (9/1/02 - 9/30/02)

Dear Ms. Parks:

I am writing on behalf of HILLPAC in response to a question raised by you concerning information contained in HILLPAC's October Monthly Report for the period September 1, 2002 through September 30, 2002 (the "October Report"). HILLPAC's response is set forth below:

## 1. Contributions Properly Reattributed

The receipt of the two contributions in question were reported on HILLPAC's October Report with a notation: "seeking redesignation." The October Report has been amended to clarify that HILLPAC was seeking a reattribution of the contributions, in compliance with the Federal Election Campaign Act of 1971, as amended, (the "Act") and FEC regulations. The reattributed contributions were reported on HILLPAC's Post-General Report filed electronically with the FEC on December 5, 2002.

Pursuant to the Act and FEC regulations, an individual may contribute \$5,000 per calendar year to a political committee. 2 U.S.C. §441a(f). If a committee receives a contribution that exceeds the limits it may retain the funds if within 60 days of receipt the excessive amount is properly reattributed to another person, such as a joint account holder, by obtaining signed written authorizations from each person making the contribution. 11 C.F.R. §110.1(k)(3). When itemizing a contribution that must be reattributed to correct an excessive amount, a committee is

instructed to include a statement noting that a reattribution has been requested. 11 C.F.R. §103.3(b)(5). In the report covering the period during which the reattribution is received, the committee must itemize as memo entries information on the contribution as it was previously disclosed and information on the contribution as it was reattributed, including the date the reattribution was received. 11 C.F.R. §104.8(d)(3).

On September 22, 2002, HILLPAC received a \$10,000 contribution from Robert Clifford. The contribution was reported on the October Report with a statement noting that a redesignation had been requested. The October Report has been amended to clarify that a reattribution had been requested pursuant to 11 C.F.R. §103.3(b)(5). HILLPAC requested and obtained a reattribution authorization signed by each person making the contribution within 60 days of the date the original contribution was received pursuant to 11 C.F.R. §110.1(k)(3). The November 19, 2002 reattribution (Robert Clifford \$5,000 and Joan Clifford \$5,000) was itemized on HILLPAC's Post-General Report filed on December 5, 2002.

On September 11, 2002 received a \$5,000 contribution from Michael Walkowitz. The contribution was reported on the October Report with a statement noting that a redesignation had been requested. The October Report has been amended to clarify that a reattribution had been requested pursuant to 11 C.F.R. §103.3(b)(5). HILLPAC requested and obtained a reattribution authorization signed by the person making the contribution within 60 days of the date the original contribution was received pursuant to 11 C.F.R. §110.1(k)(3). The November 4, 2002 reattribution (Hope Holiner \$5,000) was itemized on HILLPAC's Post-General Report filed on December 5, 2002.

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We anticipate that this information sufficiently answers your question. If you need any additional information, please contact me at your convenience.

Sincerely,

Shelly Moskwa  
December 10, 2002

Via electronic filing to FEC

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Reports Analysis Division  
Federal Election Commission  
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Washington, D.C. 20463

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We anticipate that this information sufficiently answers your question. If you need any additional information, please contact me at your convenience.

Sincerely,

Amy Wills  
Assistant Treasurer  
[END TEXT]