

ETEXT ATTACHMENT

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RYAN, PHILLIPS, UTRECHT & MACKINNON
1133 Connecticut Avenue, N.W.
Suite 300
Washington, DC 20036
phone (202) 293-1177
facsimile (202) 293-3411

November 22, 2002

Via electronic filing to FEC and
U.S. Mail with attachment

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

Re: HILLPAC (C000363994)
September Monthly Report (8/1/02 - 8/31/02)

Dear Ms. Parks:

I am writing on behalf of HILLPAC in response to a question raised by you concerning information contained in HILLPAC's September Monthly Report for the period August 1, 2002 through August 31, 2002 (the "September Report"). HILLPAC's response is set forth below:

1. Reattributed Contribution Properly Reported

HILLPAC complied fully with the Federal Election Campaign Act of 1971, as amended, (the "Act") and FEC regulations in handling and reporting the receipt and reattribution of the contribution questioned in your October 30, 2002 letter.

The receipt of the contribution in question was properly reported on HILLPAC's September Report and the reattribution was properly reported on its October Monthly Report. The answer to your question regarding how this particular contribution was reattributed is found in HILLPAC's October Monthly Report which was filed electronically with the FEC on October 20, 2002 -- ten days before the date of your letter.

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 accountholder, 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).

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On August 6, 2002, HILLPAC received a \$10,000 contribution from Michael J. Sherman. The contribution was properly reported on the September Report with a statement noting 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). A copy of the reattribution letter received by HILLPAC on September 27, 2002 and signed by Michael Sherman and Fran Sherman is attached. The September 27th reattribution was itemized on HILLPAC's October Monthly report that was filed with your agency on October 20, 2002.

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

Sincerely,

Lyn Utrecht

Enclosure

[END TEXT]