

David Vitter for Congress
202 East Livingston Place
Metairie, LA 70005

VIA FACSIMILE
IMMEDIATE ATTENTION REQUESTED

June 6, 2002

Laurence Norton, General Counsel
Federal Election Commission
999 E Street, NW
Washington, DC 20463

AOR 2002-08

JUN 7 11 30 AM '02

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE

Re: Request for Advisory Opinion

David Vitter for Congress
Identification Number: C00342410

Dear Mr. Norton:

This letter represents a written request for an Advisory Opinion from the Federal Election Commission regarding a proposed transaction of the David Vitter for Congress Committee ("David Vitter for Congress"), a primary campaign committee organized under federal law. The following are the facts.

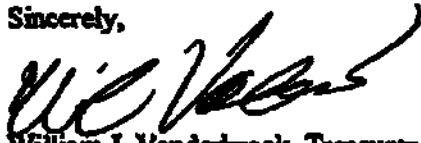
In March 2002, a state exploratory committee was formed and \$500 was transferred to this committee from David Vitter for Congress. In April 2002, \$700,000 was also transferred to this committee from David Vitter for Congress. This money was established as a separate account and was not co-mingled with any contributions made directly to the state exploratory committee under state law limits and guidelines. As of May 31, 2002, Congressman Vitter has decided not to seek office in Louisiana and the \$700,500 is still in a separate account.

Our proposed transaction is to transfer all of the \$700,500 directly back to David Vitter for Congress, dollar for dollar. All of this money was raised under federal election law guidelines and has not been co-mingled with money raised under state law nor has any of it been spent.

We do not believe that the prohibited transfer rules should bar this since these rules prohibit filtering state contributions raised under state law guidelines into a federal campaign. This is clearly not an issue here.

I look forward to your response.

Sincerely,



William J. Vanderbrook, Treasurer
David Vitter for Congress