

VIEWPAC

Value in Electing Women Political Action Committee

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2003 APR -9 P 4: 50

April 9, 2003

Mr. Jeff S. Jordan
Supervisory Attorney
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

RE: Matter Under Review 5355
Value in Electing Women Political Action Committee

Dear Mr. Jordan:

I am in receipt of your letter dated March 20, 2003, sent as a result of a complaint filed with the Commission by the Center for Responsive Politics (Complainant) on March 14, 2003. I appreciate the opportunity to respond to the MUR and do so as follows.

I. Background:

In 1997, a group of DC area professional women formed the Value in Electing Women Political Action Committee (VIEWPAC) in an effort to elect more women candidates to the House of Representatives. Recognizing Representative Pryce's efforts over the years in encouraging women to run for political office, VIEWPAC asked for her support when VIEWPAC was formed and the Board voted to name her Honorary Chairman.

VIEWPAC is run by a Board of Directors made up of professional women. Decisions are made based on recommendations that come from one of three committees - a candidate review committee, an events committee and a membership committee. VIEWPAC has a paid professional fundraiser but all the other participants (including the Board and committee members) are volunteers. A majority vote of the Board members present is required to approve requests for contributions to candidates.

The Board tries to meet regularly during an election year, either in person or by phone, to discuss the recommendations made by the candidate review committee and other matters such as the fundraising events it holds and how to increase its donor base. In non-election years, the Board will often correspond via e-mail or conference call. Representative Pryce is always welcome at the Board's meetings, however, her attendance has never been required and she has no vote.

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2003 APR -9 P 4: 52

II. The Complaint:

Based on a few newspaper reports, the Complaint filed by the Center for Responsive Politics alleges that VIEWPAC and Promoting Republicans You Can Elect Project (PRYCE Project) are "affiliated". The Commission's regulations lay out the factors that it will consider when determining whether two committees are affiliated. Those factors include whether the two committees have been "established, financed, maintained or controlled by . . . the same person or group of persons." 11 CFR 110.3(a)(2)(v).

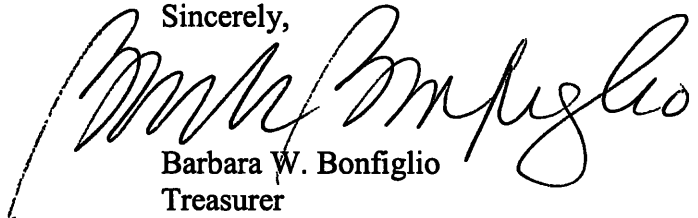
As outlined above, VIEWPAC was established by a group of women professionals. VIEWPAC is a non-connected committee that is "financed" through contributions it receives from individuals and other PACs registered with the Commission, pursuant to the restrictions of the Federal Election Campaign Act of 1974, and the Commission's regulations found at 11 CFR. VIEWPAC is maintained and controlled by a Board of Directors, all of whom volunteer their time and effort. As described above, the Board works through three separate committees that are responsible for making preliminary decisions that are then voted on by a majority of the Board members present at a meeting. Again, although Representative Pryce is the Honorary Chairman she is not a member of the Board and does not have a vote.

VIEWPAC has no relationship with the other PAC named in the complaint, Promoting Republicans You Can Elect Project (PRYCE Project). The two committees are not established, financed, maintained, or controlled by the same person or group of persons. To the best of my knowledge, the Board members of VIEWPAC have no authority, either express or implied, over any of the activities of PRYCE Project. VIEWPAC is not now and never has been affiliated with any other committee registered with the Commission. As such, VIEWPAC has not made excessive contributions as alleged by Complainant in Counts 1 through 9, and VIEWPAC has not received excessive contributions as alleged in Count 10.

VIEWPAC has no control over press reports, and the validity of their contents is often in question. Certainly, having Representative Pryce as Honorary Chairman of VIEWPAC afforded the committee unearned media that it would not otherwise have received. However, the fact that the press is willing to print something in black and white does not make it truth. The Commission will of course judge for itself the validity of the complaint (and thus the accuracy of the newspaper articles) based on the information it now has before it. It should be noted that neither Representative Pryce nor any of the Board members were quoted in any of the articles cited by the Complainant that form the basis for the complaint against VIEWPAC. One can only guess that the statements made in these articles are based on the simple fact that Representative Pryce is the "Honorary Chairman" of both VIEWPAC and the PRYCE Project.

Based on the foregoing, I respectfully request the Commission dismiss MUR 5355 and take no further action.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Barbara W. Bonfiglio', written in black ink.

Barbara W. Bonfiglio
Treasurer

24-04-407-4989