

Ms. Marlene R. Daughtrey
Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: April 2007 Monthly Report

Dear Ms. Daughtrey:

This letter responds to your inquiry dated July 13, 2007 regarding a transfer from the National Restaurant Association PAC to our connected organization, the National Restaurant Association. Your letter seeks clarification as to whether the transfer to the National Restaurant Association was for expenditures which were intended to influence federal elections. They were not. You also request clarification as to whether the National Restaurant Association PAC made advance payment for services provided by the National Restaurant Association PAC. Again, the National Restaurant Association provided no services to the PAC so that the transfer did not relate to the use of corporate resources. Instead, the National Restaurant Association PAC had issued several refunds which the contributors failed to negotiate. Those disbursements were voided, and a transfer made to the administrative fund of the National Restaurant Association in the amount of the voided disbursements. Therefore no amendment to the report is necessary.

I trust this provides the clarification requested.

Sincerely,

John Gay.
