

November 17, 2008

Kristin DeCarmine  
Senior Campaign Finance Analyst  
Reports Analysis Division  
Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

Subject: H.J. Heinz Company Political Action Committee  
Identification Number C00336040  
October Quarterly Report (7/1/08 9/30/08)

Dear Ms. DeCarmine:

We are in receipt of your letter dated October 24, 2008 regarding your review of the above referenced reports. We will file an amended report and can respond to your comments as follows:

1. Schedule B supporting Line 23 of your report discloses one or more contributions to a candidate(s) for the 2008 Primary election; however funds were disbursed after the election date(s). Please note that contributions may not be designated for an election which has already occurred unless the funds are to be used to reduce a candidate committee's debts incurred during that election campaign.

RESPONSE:

The contributions referenced in Schedule B were inadvertently designated as relating to the 2008 Primary Election due to clerical error. They are all appropriately designated as representing the 2008 General Election or, in one instance, the 2012 Primary Election. We have confirmed that all recipient committees have or will report these contributions as appropriately designated to the appropriate General or Primary Election and we have amended our report accordingly to correct this error.

2. The totals listed on Line 7, 23, 31 and 32, Column B of the Summary and Detailed Summary Page(s) appear to be incorrect. Please be advised that you should add the Calendar Year-to-Date total from your previous report to the current Total This Period figure from Column A to derive the correct Column B totals. Please amend your report and any subsequent reports that may be affected by this correction.

RESPONSE:

We have identified the error which involved three contributions of \$1,000 each that were never deposited or cashed, and which we subsequently voided. One check for \$1,000 was then reissued. We have amended all affected reports and will refile them with the FEC.

3. Your calculations for Line 8 appear to be incorrect. Cash-on-hand at the close of the current reporting period should always equal the closing calendar year-to-date cash-on-hand amount. Provide the corrected total on the Summary Page.

RESPONSE:

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**ETEXT ATTACHMENT**

As with item #2 above, this discrepancy was due to the voiding of three contributions totaling \$3,000 in the aggregate and the reissuance of one check for \$1,000. Also, we corrected an error in entering the amount of one disbursement for \$2,000. We have amended all affected reports.

4. Commission Regulations require that a committee disclose the identification of all individuals who contribute in excess of \$200 in a calendar year. Your report discloses contributions from individuals for which the identification is not complete.

RESPONSE: The occupations of some of the contributors to the H.J. Heinz Political Action Committee were inadvertently omitted due to clerical error. We have provided this information in the newly-filed amended report.

Should you have any questions or care to discuss these amendments, please do not hesitate to contact me.

Very truly yours,

Patrick J. Guinee  
Assistant General Counsel

PJG/mbb

cc: L.A. Cullo  
T.N. Bobby  
D. McCune