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ARCH COAL, INC.
CITYPLACE ONE, SUITE 300
ST LOUIS MISSOURI 63141
(314) 994-2700

JAMES E. FLORCZAK
Treasurer

January 6, 2004

Federal Election Commission
999 E Street, NW
Washington, DC 20463
Attn: Reports Analysis Division

Re: ID Number C00167668 Arch Coal Inc. PAC (ARCHPAC)

Dear Maureen Benitz:

I refer to your letter dated December 17, 2003 in which you aggregate contributions made by Ashland Inc. with contributions made by Arch Coal Inc.

Please refer to the message that we sent to you via your FEC software on April 9, 2002 when we explained that Ashland Inc. owned less than 10% of Arch Coal as of March 27, 2000 when they effected a taxable distribution of 17,397,233 shares of Arch Coal Inc. You may also find this information through publicly available SEC reports filed by Ashland, Inc

Please correct your records to show that Ashland Inc. is unrelated to Arch Coal Inc.

I'm providing you with a copy of our original message to you printed from the FEC software.

If you have any questions regarding this, please feel free to call me at (314) 994-2785.

Yours truly,

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

December 17, 2003

James E. Florczak, Treasurer
Arch Coal Inc Political Action Committee (ARCHPAC)
City Place One Suite 300
St Louis, MO 63141

Response Due Date:
January 16, 2004

Identification Number: C00167668

Reference: Mid-Year Report (1/1/03-6/30/03)

Dear Mr. Florczak:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **An adequate response must be received at the Commission by the response date noted above.** An itemization of the information needed follows:

-Schedule B of your report (see attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. 2 U.S.C. §441a(a) prohibits a multicandidate committee and its affiliates from making a contribution to a candidate for federal office in excess of $5,000 per election.

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If any contribution you made exceeds the limits, you must request a refund of the excessive amount or provide a written authorization for a redesignation of the contribution pursuant to 11 CFR §110.2(b) within 60 days of the treasurer's receipt.

If the foregoing conditions for redesignations were not met within 60 days of the treasurer's receipt, your committee must obtain a refund of the excessive amount.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund or redesignation request sent

to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. 11 CFR §110.1(b)

Although the Commission may take further legal action regarding the excessive contribution(s), your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

Unlike previous election cycles, you will not receive an additional notice from the Commission on this matter. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. **Requests for extensions of time in which to respond will not be considered.** Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division) or my local number (202) 694-1135.

Sincerely,

Maureen Benitz
Campaign Finance Analyst
Reports Analysis Division

294

Recipient Name	Date	Amount	Election	Report	Contributing Affiliate
Citizens for Bunning	3/30/01	$1,000.00	2004 P	April Monthly	Ashland Inc. Political Action Committee for Employees
Citizens for Bunning	9/28/01	$1,000.00	2004 P	October Monthly	Ashland Inc. Political Action Committee for Employees
Citizens for Bunning	10/2/02	$3,000.00	2004 P	12 Day Pre-General	Ashland Inc. Political Action Committee for Employees
Citizens for Bunning	5/16/03	$2,000.00	2004 P	Mid-Year	
Citizens for Bunning	5/29/03	$1,000.00	2004 P	Mid-Year	
Voinovich for Senate Committee	3/22/00	$1,000.00	2004 P	April Monthly	Ashland Inc. Political Action Committee for Employees
Voinovich for Senate Committee	9/20/00	$1,617.00	2004 P	October Monthly	Ashland Inc. Political Action Committee for Employees
Voinovich for Senate Committee	5/30/02	$2,000.00	2004 P	June Monthly	Ashland Inc. Political Action Committee for Employees
Voinovich for Senate Committee	3/14/03	$2,000.00	2004 P	Mid-Year	

ETEXT ATTACHMENT

Ashland Inc. effected a taxable distribution of 17,397,233 shares of Arch Coal, Inc. on March 27, 2000. The distribution educed Ashland's ownership interest in Arch Coal to less than 10% of the outstanding shares. As a result, the Arch Coa- Inc. Political Action Committee (ARCHPAC) should no longer be 'affiliated' with Ashland Inc.'s Political Action Commit- ee (PACE) effective March 27, 2000. Further details are available through publicly available SEC reports filed by Ashland, Inc.

Federal Election Commission

ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS

The Commission has added this page to the end of this filing to indicate how it was received.

☐	Hand Delivered	Date of Receipt
☑	First Class Mail	POSTMARKED 1-6-04
☐	Registered/Certified Mail	POSTMARKED (R/C)
☐	No Postmark	
☐	Postmark Illegible	
☐	Received from the House office of Records and Registration	Date of Receipt
☐	Received from the Senate Office of Public Records	Date of Receipt
☐	Other (Specify):	Postmarked _____ and/or Date of Receipt
☐	Electronic Filing	

dmb — PREPARER

1-13-04 — DATE PREPARED

(6/2000)