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September 8, 2010

Alexandra T. Broomhead  
Senior Campaign Finance Analyst  
Reports and Analysis Division  
Federal Election Commission  
Washington DC, 20463

Identification Number: C00034785  
Reference: February Monthly Report (1/1/10 – 1/31/10)

Dear Ms Broomhead:

This letter is in response to your request for information relating to multiple contributions made by ACA's Political Action Committee (ACPAC) to Friends of David Harmer.

The contribution of \$5,000 made on 6/26/2009 was given to the Harmer Campaign for the CA 10<sup>th</sup> District special election held November 3, 2009. Mr. Harmer was defeated in this race by California Lt. Gov. John Garamendi.

In January 2010 Mr. Harmer announced his candidacy for the Republican Primary in CA's 11<sup>th</sup> District. Shortly after that announcement, ACPAC made a contribution of \$2,500 on January 22, 2010 to the Harmer campaign supporting his candidacy in the 11<sup>th</sup> district.

If you believe this additional contribution is still in question or incorrectly disclosed, please let me know and I will take the proper steps to correct this issue.

I hope you find this response adequate. If you have any further questions or concerns please contact me at 952-928-8000 ext. 104.

Thank you for your attention to this matter.

Best Regards,

Jean Cottington  
Director of Political Affairs  
ACA International

JC/msa

**ACA International's Political Action Committee**

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

September 3, 2010

Jean Cottington, Treasurer  
ACPAC ACA International Political Action  
Committee  
4040 W. 70<sup>th</sup> Street  
Minneapolis, MN 55435

**Response Due Date:  
October 8, 2010**

Identification Number: C00034785

Reference: February Monthly Report (1/1/10 – 1/31/10)

Dear Treasurer:

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. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following item:

- 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.

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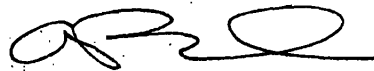
Please inform the Commission of your corrective action promptly in writing and provide a photocopy of the refund or redesignation request sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they 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.

**Please note, you will not receive an additional notice from the Commission on this matter.** Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. 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. **Requests for extensions of time in which to respond will not be considered.**

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 5 to reach the Reports Analysis Division) or my local number (202) 694-1172.

Sincerely,



Alexandra T. Broomhead  
Senior Campaign Finance Analyst  
Reports Analysis Division

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**Excessive Contribution To a Candidate:**

<b>Recipient Name</b>	<b>Date</b>	<b>Amount</b>	<b>Election</b>	<b>Report</b>
Friends of David Harmer	6/26/09	\$5,000	P-2010	2009 July Monthly
Friends of David Harmer	1/22/10	\$2,500	P-2010	2010 February Monthly

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Federal Election Commission  
**ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS**  
 The FEC added this page to the end of this filing to indicate how it was received.

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Delivery Confirmation™ or Signature Confirmation™ Label <input type="checkbox"/>	
<input type="checkbox"/> USPS Express Mail	Postmarked
<input type="checkbox"/> Postmark Illegible	
<input type="checkbox"/> No Postmark	
<input type="checkbox"/> Overnight Delivery Service (Specify):	Shipping Date
Next Business Day Delivery <input type="checkbox"/>	
<input type="checkbox"/> Received from House Records & Registration Office	Date of Receipt
<input type="checkbox"/> Received from Senate Public Records Office	Date of Receipt
<input type="checkbox"/> Received from Electronic Filing Office	Date of Receipt
<input type="checkbox"/> Other (Specify):	Date of Receipt or Postmarked

*Jm W*  
 PREPARER

*9/13/10*  
 DATE PREPARED

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