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March 31, 2004

Mr. Edward D. Ryan, Campaign Finance Analyst  
Reports Analysis Division  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20469

Reference: October Monthly Report (9/1/03-9/30/03)

Dear Mr. Ryan:

This letter is in response to your letter dated March 3, 2004 regarding a possible excessive contribution made to the Keep Our Majority PAC during 2003 by Citigroup Inc. PAC - Federal/State, FEC Identification number C00039305.

After reviewing the list of contributions provided with your letter, it appears that you have incorrectly included the \$2,500 contribution made by the Travelers Property Casualty Corp. PAC on 06/19/03.

Citigroup PAC - Federal/State and Travelers Property Casualty Corp. PAC are no longer affiliated nor were they at the time the contribution in question was made. Citigroup Inc. PAC - Federal/State filed an amended Statement of Organization on September 11, 2002 notifying the FEC that Travelers Property Casualty Corp. PAC was no longer affiliated with Citigroup PAC - Federal or Citigroup PAC - Federal/State.

I trust that this letter will be an adequate response to your correspondence. However, if you have any questions or if anything further is required of the Citigroup Inc. PAC - Federal/State, please let me know. I may be reached by phone at 212.291.2964.

Sincerely,

Barbara E. Higham  
Treasurer

CITIGROUP PAC Administration  
1101 Pennsylvania Avenue, N.W., Suite 1000  
Washington, DC 20004  
tel 202-879-6868 Fax 202-5763-4469  
post@citigroup.com

CITIGROUP PAC



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

March 3, 2004

RQ-2

Barbara E. Higham, Treasurer  
Citigroup Inc. Political Action Committee --  
Federal/State (Citigroup PAC-Federal/State)  
399 Park Avenue  
New York, NY 10043

**Response Due Date:**  
**April 2, 2004**

Identification Number: C00039305

Reference: October Monthly Report (9/1/03-9/30/03)

Dear Ms. Higham:

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 committee from making contributions to another political committee and its affiliates in excess of \$5,000 per calendar year. The Commission notes the receipt of the refund(s) of a portion of the excessive contribution(s) on your December Monthly Report (11/1/03-11/30/03); however, your committee apparently reissued a contribution to the same recipient on 12/5/03.

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

If you have made an excessive contribution, you must notify the recipient and request a refund of the amount in excess of \$5,000. The refund of the excessive amount must be made within sixty (60) days of receipt of the contribution.

CITIGROUP INC. POLITICAL ACTION COMMITTEE - FEDERAL/STATE (CITIGROUP  
PAC-FEDERAL/STATE) PAGE 2

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund 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.

Although the Commission may take further legal action regarding the excessive contribution(s), your prompt action in obtaining a refund 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) 694-1144.

Sincerely,



Edward D. Ryan  
Campaign Finance Analyst  
Reports Analysis Division

CITIGROUP INC. POLITICAL ACTION COMMITTEE - FEDERAL/STATE (CITIGROUP  
PAC-FEDERAL/STATE) PAGE 3

Recipient Name	Date	Amount	Election	Report	Contributing Affiliate
Keep Our Majority PAC	01/24/2003	\$1,500	Per Year	2003 February Monthly	Citigroup Inc. Political Action Committee-Federal ID # C00008474
Keep Our Majority PAC	06/19/2003	\$2,500	Per Year	2003 July Monthly	Travelers Property Casualty Corp. Political Action Committee (Cap Pac) ID # C00376376
Keep Our Majority PAC	09/11/2003	\$3,500	Per Year	2003 October Monthly	Citigroup Inc. Political Action Committee - Federal/State ID # C00039305

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.

<input type="checkbox"/> Hand Delivered	Date of Receipt
<input type="checkbox"/> USPS First Class Mail	Postmarked
<input type="checkbox"/> USPS Registered/Certified/Priority/Express Mail	Postmarked (R/C)
<input type="checkbox"/> Postmark Illegible	
<input type="checkbox"/> No Postmark	
<input checked="" type="checkbox"/> Overnight Delivery Service (Specify): <i>Priority</i>	Shipping Date <i>3-11-04</i>
<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
<i>Set</i>	<i>4-1-04</i>
PREPARER	DATE PREPARED