



ARAPAC - Agricultural Retailers Association Political Action Committee

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March 12, 2004

Ms. Colleen Manning
Federal Election Commission
Reports Analysis Division
999 E Street, N.W.
Washington, D.C. 20463

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**Re: Agricultural Retailers Association Political Action Committee
ID No. C00264770
Amended July 2003 Quarterly Report**

Dear Ms. Manning:

I am in receipt of your February 18, 2004, request for additional information ("RFAI") related to the above-referenced committee. Your letter references a transfer of Four Thousand Eight Hundred Fifty Three and 00/100 (\$4,853.00) from the ARAPAC to the Agricultural Retailers Association ("ARA") account. You indicate that this transfer may indicate that ARAPAC maintains a non-federal account thereby requiring allocation of expenses between the federal and non-federal account in accordance with 11 CFR §§ 106.6 and 106.7.

The Four Thousand Eight Hundred Fifty Three and 00/100 (\$4,853.00) was transferred from ARAPAC to the general treasury fund of the Agricultural Retailers Association. It was specifically transferred into the ARA administrative account. This account is not a non-federal account since it makes no contributions to non-federal candidates. Rather, this is the account maintained by ARA from which the administrative and overhead expenses are paid by ARA for ARAPAC, in accordance with 2 U.S.C. § 441(b)(2)(C).

An amendment to the above-referenced report will be filed under separate cover with the Commission to further detail the purpose of the disbursement in question. Thank you for your time and attention to this matter. Should you have any follow-up questions please contact me at your convenience.

Sincerely,

Jack Eberspacher, Treasurer
Agricultural Retailers Association Political Action Committee

Federal Election Commission
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