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Sun City Democrats Club Informed Members PAC of Texas
Clinton B. McCutcheon, Treasurer
110 Warbler Way
Georgetown, Texas 78628

2007 JAN 11 A 8:23

Dec. 31, 2006

Ms. Laura E. Sinram
Campaign Finance Analyst
Reports Analyst Division

Subject: I.D.C00429233
Your letter of Dec. 22, 2006

Dear Ms. Sinram:

The Sun City Democrats Club was originally formed as a social club, and remained that way for a number of years. In late 2005 it was decided that a Political Action Committee should be formed so that the club could participate in trying to elect political candidates. That Political Action Committee was named:

Sun City Democrats Club Informed Members PAC of Texas,
with an acronym of IMPACT.

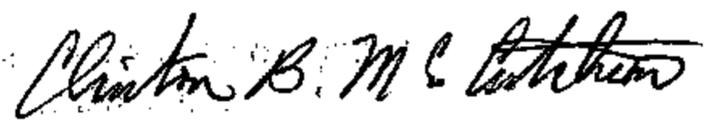
The "Sun City Democrats Club Informed Members PAC of Texas" is a single Political Action Committee, with two separate bank accounts to handle Federal and Non-Federal monies. Only receipts from the fund raiser for Federal Candidates have been deposited in the Federal account.

We are a relatively new, very small, non-connected committee which has been feeling our way in getting started. There was initially no specific activity designated "Federal" so we complied with the rules of the Texas Ethics Commission. In the late summer of 2006 it was decided that the PAC would sponsor a fund raiser, with the proceeds to support Federal candidates. At this point we established a separate bank account in which to deposit receipts generated by the fund raiser.

In filing the "Statement of Organization", dated 9-26-06 I was uncertain how to answer Item #6 and wrote as relationship in very small letters "State PAC same name and address". Maybe I should have written in the name of the Club i.e. Sun City Democrats Club, and opposite relationship written in the word Sponsor.

I hope this will clarify the situation. If an amended Statement of Organization needs to be filed I will be glad to file one. I plan to call you within the next two weeks to see if this letter provides an adequate response.

Respectfully,



Clinton B. McCutcheon
Treasurer

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Federal Election Commission
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