



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-1

October 21, 2005

Heidi Rudolph, Treasurer
Sears Holdings Corporation PAC
3333 Beverly Road, BC-113A
Hoffman Estates, IL 60179

**Response Due Date:
November 21, 2005**

Identification Number: C00038612

Reference: Amended Statement of Organization, received 10/6/05

Dear Ms. Rudolph:

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:

-Please clarify your relationship, if any, with Sears, which appears to be your connected organization. For further guidance on the question of connected organizations, please refer to 11 CFR §100.6. If your committee is a separate segregated fund, you should amend your Statement of Organization to reflect this relationship as "connected" on Line 6.

-Line 6 of your Amended Statement of Organization identifies the name of your connected organization as "Sears." However, previous filings have indicated the name of your connected organization to be "Sears Holdings Corporation." Please clarify the name of your connected organization.

Please note, 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.

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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) 694-1157.

Sincerely,



Laura E. Sinram
Campaign Finance Analyst
Reports Analysis Division

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