

April 13, 2007

Ms. Jodi Winship  
Senior Campaign Finance Analyst  
Reports Analysis Division  
Federal Election Commission  
999 E Street, N.W.  
Washington, DC 20463

Re: All America PAC  
FEC ID No. C00344788

Dear Ms. Winship:

This is in response to your letter dated March 14, 2007 concerning the Year End Report (11/28/06-12/31/06) of the All America PAC (the "Committee").

You ask about expenditures for "Catering" and "Fundraising Consulting Services." These expenditures were for the Committee's own operation and were not made on behalf of any specifically identified federal candidate.

You also asked about an expenditure for "Communications Consulting and Expenses." This expense was made to conduct the committee's own activities and did not contain express advocacy.

We hope that this information adequately addresses your questions. If you need any further information, please do not hesitate to contact the Committee.

Very truly yours,

Robert Bauer  
Counsel to All America PAC

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