



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

October 5, 2005

William Jeffrey Shipp, Treasurer  
Farm Credit Council Political Action  
Committee  
50 F Street NW Suite 900  
Washington, DC 20001

**Response Due Date:  
November 4, 2005**

Identification Number: C00193631

Reference: September Monthly Report (8/01/05 – 8/31/05)

Dear Mr. Shipp:

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:

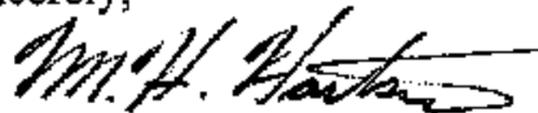
-Schedule(s) B supporting Line 21(b) of your report itemizes \$615,432.87 in disbursements to "SunTrust Bank". It appears that these disbursements were made for the purpose of investing funds. Please be advised that when a committee invests funds in a money market fund or similar type of account, the principle deposited remains a committee asset and must be included in the committee's cash-on-hand total. Further, the committee should not report this type of investment as a disbursement because doing so inflates disbursements and reduces the committee's ending cash balance. 11 CFR 104.3(a)(1) and Advisory Opinion 1990-2. Please amend your report and any subsequent reports that may be affected by this correction or provide clarification regarding this activity.

**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) 694-1398.

Sincerely,



Michael H. Hartsock  
Campaign Finance Analyst  
Reports Analysis Division

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