



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

November 9, 2006

Jerry Howe Jr., Treasurer
All America PAC
607 14th Street NW, Suite 800
Washington, DC 20005

**Response Due Date:
December 11, 2006**

Identification Number: C00344788.

Reference: October Quarterly Report (7/1/06-9/30/06)

Dear Mr. Howe:

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 all expenditures made for "Catering," "Catering & Office Expense," and "Fundraising Consulting Services" on Schedule B. If a portion or all of these expenditures were made on behalf of specifically identified federal candidates, this amount should be disclosed on Schedules B or E supporting Lines 23 or 24 and include the amount, name, address and office sought by each candidate. 11 CFR §§104.3(b) and 106.1

-Schedule B discloses an expenditure(s) for "Printing," "Direct Mail Consulting Services," "Direct Mail Services," "Direct Mail Services and Postage," "Postage," and "Communications Consulting & Expenses." If a portion or all of these expenditures were for public communications (as defined by 11 CFR §100.26) and voter drive activity (under 11 CFR §106.6(b)(2)(i)) containing express advocacy as defined under 11 CFR §100.22, this would constitute an in-kind contribution or an independent expenditure and should be properly disclosed on a Schedule B or E supporting Line 23 or 24 as appropriate. Public communications and voter drive activity that refer to a clearly identified Federal candidate, but that do not expressly advocate the election or defeat of that candidate should be reported on Schedule B for Line 21(b) of the Detailed Summary Page.

26039271509

Please clarify whether this activity contained express advocacy and amend your report to properly disclose this activity, if necessary.

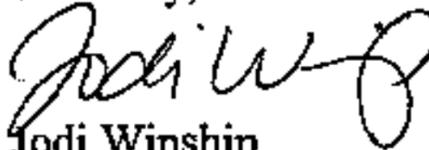
-Schedule A of your report (see attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. The Act prohibits a committee from receiving contributions from another political committee or a person in excess of \$5,000 per calendar year. 2 U.S.C. §441a(f)

The Commission notes the memo text attached to the receipt stating "excessive contribution to be refunded." Please provide the date of the refund and a photocopy of the refund check sent to the individual. Although the Commission may take further legal action concerning the acceptance of an excessive contribution(s), your prompt action in refunding or transferring-out the contribution(s) will be taken into consideration.

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.

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- 1136.

Sincerely,



Jodi Winship

Senior Campaign Finance Analyst
Reports Analysis Division

Contributor Name	Date	Amount	Report
John A Edwardson	08/16/2006	\$5,000.00	2006 October Quarterly
John A Edwardson	05/17/2006	\$5,000.00	2006 July Quarterly

26039271510

26039271511