

Ms. Laura E. Sinram
Senior Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
Washington, DC 20463

Re: Statement of Organization, received 2/9/07; FEC ID C00432260

Dear Ms. Sinram:

Your October 11, 2007 letter asks whether the Club for Growth PAC is affiliated with the Citizens Club for Growth Inc. PAC. Despite the similarity of the names, the two PACs are not affiliated. The Club for Growth PAC is the separate segregated fund of the Club for Growth while the Citizens Club for Growth PAC is the separate segregated fund of the Citizens Club for Growth, as indicated in the public record.

As previously explained to the General Counsel's staff, the Citizens Club for Growth sold its name and its assets to the Club for Growth in an arms length, market price transaction resulting in two distinct, unaffiliated, organizations.

The indicia of affiliation identified in the FEC regulations in 11 C.F.R. 100.5(g) and 110.3 underscore that the two PACs are not affiliated. The two committee are not established, maintained, or controlled by the same corporation, person or group of persons. The Boards of the two entities are not identical, nor is there significant overlap of Board members. Neither organization has the ability to direct or participate in the governance of the other organization or have the authority or ability to hire, appoint, demote, or otherwise control the officers or other decisionmaking employees of the other organization. Further, the memberships of the two organizations are separate and distinct and membership does not convey from one organization to the other. The Club does not provide any funds to the Citizens Club, or vice versa, for administrative, fundraising, or other costs, nor does the Club arrange for any funds to be provided to the Citizens Club for Growth.
