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James G. Derian, Treasurer
Armenian American Public Affairs Committee
41 Lakeview Drive
Oxford, MI 48370

2004 DEC 15 A 9 05

December 9, 2004

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

Re: *Armenian American Public Affairs Committee (ID # C00355628)*

Dear Ms. Needles:

This letter is in response to your request for an explanation of the \$3,500 transfer from our "State PAC" noted in our July Quarterly Report (4/1/04 - 6/30/04). The reason for this transfer was that this \$3,500 was originally mis-deposited in our state account by me. The donations came from our board members, who did not designate on their checks whether their annual contributions should go to the state or federal bank account. Rather, that task was left up to me as treasurer to allocate the contributions to the state and federal accounts according to our projected needs. The \$3,500 in question was intended by me to be deposited into our federal checking account, but I mistakenly endorsed the checks with our stamp for the state checking account. (The two stamps look similar and I got the account numbers mixed up.) It was only later that I realized that I had mistakenly deposited these funds into the state, rather than federal checking account. Because over 9/10 of our PAC's funding comes from our seven board members' contributions, rather than appeals to the public, this mis-deposit on my part had to be corrected by a transfer of the mis-deposited funds to our federal account. In other words, we could not rectify this problem by simply raising more funds because our directors had already given what they had agreed to for the year, and we were not doing any other fundraising for the PAC.

At this time, I ask that the FEC recognize the \$3,500 transfer in question as the correction of an inadvertent mis-deposit on my part as treasurer into the state checking account. We only have a little over \$1,000 in our federal account at the present anyway so, if my mis-deposit is not recognized as the mistake that it was, we will have to list most of the \$3,500 transfer as a debt to our state account. Again, however, I ask for your indulgence in recognizing my mistaken deposit.

Andrea Needles
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Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script that reads "James G. Derian". The signature is written in black ink and is positioned above the printed name and title.

James G. Derian, Treasurer
Armenian American Public Affairs Committee

Federal Election Commission
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