

October 5, 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 September 5, 2007, concerning the Mid-Year Report (1/1/07-6/30/07) from the above referenced Committee.

You ask about payments from individuals to All America PAC (the Committee). These payments were made to purchase the Committee's used office equipment. The Committee charged the usual and normal cost for the office equipment sold.

You also ask about payments to the Evan Bayh Committee. The Committee paid the fair market value for the goods in question.

You state that Political Consulting Services is not an acceptable purpose for disbursements. The Committee will amend its report to clarify the purpose listed.

You further ask about voided checks for expenditures made during this or previous reporting periods. In reviewing its activity, the Committee discovered a number of uncleared checks. The Committee researched each disbursement, issued replacement checks for those expenses still owed by the committee and voided those disbursements that the committee discovered it had already paid or did not owe.

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

You also ask about expenditures for "Mailing List," "Photography Services & Travel," "Reimbursement ? Postage," "Printing" and "Postage." These expenditures were made to conduct the Committee's own general activities and programs and did not contain express advocacy.

Finally, you ask about the Committee's payments for administrative expenses. The Committee was in the process of substantially contracting its operations in 2007; therefore, it had fewer administrative expenses. During the reporting period, it maintained no office and had no employees. It relied primarily on our law firm, Perkins Coie, and volunteers to administer the Committee's activities.

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

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ETEXT ATTACHMENT

Very truly yours,

Robert F. Bauer
Counsel to All America PAC
