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October 23, 2007

Daniel T. Buckley
Senior Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
Washington, D.C. 20463

Reference: Identification Number C00131219
July Quarterly Report (4/1/07-6/30/07)

Dear Mr. Buckley,

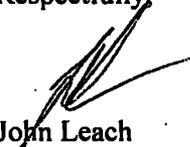
Thank you for bringing these items to my attention. Our FEC Form 3X has been amended completing column B.

Mr. Thomas Diederich retired from Orkin after 33 years of loyal service. Mr. Christopher A. Gorecki has been named Treasurer of the Orkin Exterminating Company Inc. Political Action Committee in accordance with our By-Laws by Glenn W. Rollins, President of Orkin, Inc. I have attached a copy of his Certificate of Appointment for your review.

I believe we have addressed the items referenced in your October 12, 2007 letter. Please advise if we have failed to make all the required corrections or should you have any questions, please call me at 404-888-2831.

Thank you for your assistance.

Respectfully


John Leach
Coordinator
Government Relations/Environmental Stewardship

Enclosures

cc: Chris Gorecki, Orkin, Inc. (w/o enclosure)

2170 PIEDMONT ROAD N. E. • ATLANTA, GA • 30324
PHONE: 404-888-2831 • FAX: 404-877-4454

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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RQ-2

October 12, 2007

Thomas Diederich, Treasurer
Orkin Exterminating Company Inc Political
Action Committee
2170 Piedmont Road NE
Atlanta, GA 30324

**Response Due Date:
November 13, 2007**

Identification Number: C00131219

Reference: July Quarterly Report (4/1/07-6/30/07)

Dear Treasurer:

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. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 2 items:

1. Your report(s) was not signed by the treasurer or designated agent listed on your Statement of Organization. Please amend your report(s) by providing the signature of an individual that is authorized to sign the report(s). 2 U.S.C. §434(a)(1) and 11 CFR §104.14(a) and (d) If a new treasurer has been appointed, please file an amended Statement of Organization (FORM 1) or a letter (if not an electronic filer) to reflect this change.
2. Please provide the Column B totals for the Summary Page. Note that changes in your figures may affect your Column B totals on this report and/or on subsequent reports.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. 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. **Requests for extensions of time in which to respond will not be considered.**

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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) 694-1141.

Sincerely,



Daniel T. Buckley
Senior Campaign Finance Analyst
Reports Analysis Division

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**FEC
FORM 3X**

**REPORT OF RECEIPTS
AND DISBURSEMENTS**
For Other Than An Authorized Committee

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Office Use Only

1. NAME OF COMMITTEE (in full)

TYPE OR PRINT ▼

Example: If typing, type over the lines.

12FE4M5

Christopher A Gorecki

ORKIN Exterminating Co

ADDRESS (number and street)

Political Action Committee

2170 Piedmont Rd

Check if different than previously reported. (ACC)

Atlanta GA 30324

2. FEC IDENTIFICATION NUMBER ▼

CITY ▲

STATE ▲

ZIP CODE ▲

C00131219

3. IS THIS REPORT

NEW (N)

OR

AMENDED (A)

4. TYPE OF REPORT (Choose One)

(a) Quarterly Reports:

- April 15 Quarterly Report (Q1)
- July 15 Quarterly Report (Q2)
- October 15 Quarterly Report (Q3)
- January 31 Year-End Report (YE)
- July 31 Mid-Year Report (Non-election Year Only) (MY)
- Termination Report (TER)

(b) Monthly Report Due On:

- Feb 20 (M2)
- Mar 20 (M3)
- Apr 20 (M4)
- May 20 (M5)
- Jun 20 (M6)
- Jul 20 (M7)
- Aug 20 (M8)
- Sep 20 (M9)
- Oct 20 (M10)
- Nov 20 (M11) (Non-Election Year Only)
- Dec 20 (M12) (Non-Election Year Only)
- Jan 31 (YE)

(c) 12-Day PRE-Election Report for the:

- Primary (12P)
- Convention (12C)
- General (12G)
- Special (12S)
- Runoff (12R)

Election on [] / [] / [] in the State of []

(d) 30-Day POST-Election Report for the:

- General (30G)
- Runoff (30R)
- Special (30S)

Election on [] / [] / [] in the State of []

5. Covering Period

04 / 01 / 2007

through

06 / 30 / 2007

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer

Christopher A Gorecki

Signature of Treasurer

[Handwritten Signature]

Date

07 / 15 / 2007

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

Office Use Only

FEC FORM 3X
Rev. 12/2004

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**SUMMARY PAGE
OF RECEIPTS AND DISBURSEMENTS**

FEC Form 3X (Rev. 02/2003)

Page 2

Write or Type Committee Name

ORKIN Exterminating Co - PAC

Report Covering the Period:

From:

04 / 01 / 2007

To:

06 / 30 / 2007

**COLUMN A
This Period**

**COLUMN B
Calendar Year-to-Date**

6. (a) Cash on Hand January 1, 2007	16,646.97
(b) Cash on Hand at Beginning of Reporting Period.....	18,030.24
(c) Total Receipts (from Line 19)	2,588.46
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B).....	19,223.91
7. Total Disbursements (from Line 31).....	3.06
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d)).....	19,220.85
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	

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This committee has qualified as a multicandidate committee. (see FEC FORM 1M)

For further information contact:

Federal Election Commission
999 E Street, NW
Washington, DC 20463

Toll Free 800-424-9530
Local 202-694-1100

DETAILED SUMMARY PAGE
of Disbursements

II. Disbursements

COLUMN A
Total This Period

COLUMN B
Calendar Year-to-Date

21. Operating Expenditures:		
(a) Allocated Federal/Non-Federal Activity (from Schedule H4)		
(i) Federal Share	000	000
(ii) Non-Federal Share	000	000
(b) Other Federal Operating Expenditures	3.06	14.58
(c) Total Operating Expenditures (add 21(a)(i), (a)(ii), and (b))	3.06	14.58
22. Transfers to Affiliated/Other Party Committees		
23. Contributions to Federal Candidates/Committees and Other Political Committees		
24. Independent Expenditures (use Schedule E)		
25. Coordinated Party Expenditures (2 U.S.C. §441a(d)) (use Schedule F)		
26. Loan Repayments Made		
27. Loans Made		
28. Refunds of Contributions To:		
(a) Individuals/Persons Other Than Political Committees		
(b) Political Party Committees		
(c) Other Political Committees (such as PACs)		
(d) Total Contribution Refunds (add Lines 28(a), (b), and (c))		
29. Other Disbursements		
30. Federal Election Activity (2 U.S.C. §431(20))		
(a) Allocated Federal Election Activity (from Schedule H6)		
(i) Federal Share		
(ii) "Levin" Share		
(b) Federal Election Activity Paid Entirely With Federal Funds		
(c) Total Federal Election Activity (add Lines 30(a)(i), 30(a)(ii) and 30(b))		
31. Total Disbursements (add Lines 21(c), 22, 23, 24, 25, 26, 27, 28(d), 29 and 30(c)) ..	3.06	14.58
32. Total Federal Disbursements (subtract Line 21(a)(ii) and Line 30(a)(ii) from Line 31)	3.06	14.58

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DETAILED SUMMARY PAGE
of Disbursements

FEC Form 3X (Rev. 02/2003)

Page 5

III. Net Contributions/Operating Expenditures	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
33. Total Contributions (other than loans) (from Line 11(d), page 3)	1,193.67	2,588.46
34. Total Contribution Refunds (from Line 28(d))	0.00	0.00
35. Net Contributions (other than loans) (subtract Line 34 from Line 33)	1,193.67	2,588.46
36. Total Federal Operating Expenditures (add Line 21(a)(i) and Line 21(b))	3.06	14.58
37. Offsets to Operating Expenditures (from Line 15, page 3)	0.00	0.00
38. Net Operating Expenditures (subtract Line 37 from Line 36)	3.06	14.58

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PAC Statement Reconciliation
To: K Meekins

Account Tax ID
 Number Number
 3750256460 000303381

Statement	Beginning Balance	Deposits	Withdrawals	Fees	Ending Balance
1/31/07	\$ 16,646.97	\$ 276.64	\$ -	\$ 3.23	\$ 16,920.38
2/28/07	\$ 16,920.38	\$ 1,059.98	\$ -	\$ 2.34	\$ 17,978.02
3/30/07	\$ 17,978.02	\$ 58.17	\$ -	\$ 5.95	\$ 18,030.24
4/30/07	\$ 18,030.24	\$ 917.10	\$ -	\$ 0.93	\$ 18,946.41
5/31/07	\$ 18,946.41	\$ 133.86	\$ -	\$ 2.13	\$ 19,078.14
6/30/07	\$ 19,078.14	\$ 142.71	\$ -	\$ -	\$ 19,220.85
					\$ -
					\$ -
					\$ -
					\$ -
					\$ -
					\$ -
					\$ -

Checks:

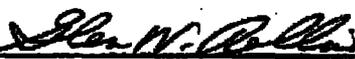
Withdrawal Statement	Check #	Ck Date	Amount	Payee
			\$ -	

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Certificate of Appointment

Pursuant to Article V of the By-Laws of the Orkin Exterminating Company, Inc. Political Action Committee, I, Glen W. Rollins, President of Orkin, Inc. (f/k/a/ Orkin Exterminating Company, Inc.), hereby appoint Christopher A. Gorecki as Treasurer of the Political Action Committee.

The Treasurer shall perform his duties in accordance with the By-laws of the Political Action Committee.


Glen W. Rollins, President

7/18/07
Date

Orkin, Inc., (f/k/a Orkin Exterminating Company, Inc.)

SEAL

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LAW OFFICES
KILPATRICK & CODY
SUITE 400
2033 K STREET, N.W.
WASHINGTON, D. C. 20008

ATLANTA OFFICE
100 PEACHTREE STREET
ATLANTA, GEORGIA 30303
TELEPHONE (404) 572-6500

TELEPHONE (202) 633-3620

TELEX 54-2307
TELECOPIER
(404) 688-1826 ATLANTA
(202) 298-1209 WASHINGTON

June 10, 1980

R.M. Russell
Vice President
Government Relations
Orkin Pest Control
2170 Piedmont Road, N.E.
Atlanta, Georgia 30324

Orkin - PAC

Dear Bob:

Thank you for your letter of June 3, 1980, regarding the officers and members of Orkin's PAC.

I spoke by telephone with Jim Schneider and have asked him to complete the Statement of Organization and to forward it to me for filing with the Federal Election Commission. The names of the Treasurer, Assistant Treasurer and the PAC's bank must be set forth in items 8 and 9, and the Statement must be executed by the Treasurer.

I have enclosed a revised set of by-laws, consistent with the organizational structure that you have adopted. I would appreciate your advising me of any additional changes that you deem appropriate.

As stated in my letter of May 9, 1980, the Statement of Organization should be filed within 10 days of the establishment of the PAC, which could mean either the date upon which the Committee's officers are finally designated or the date on which the Board of Directors or President of Orkin directs that the Committee be established. The first quarterly report will be due on July 15, 1980.

Please get in touch next time you are in Washington. I would like to show you our offices and have you join me for lunch or dinner.

Best regards.

Sincerely yours,

Joseph W. Dorn
Joseph W. Dorn

cc: James M. Schneider (w/enclosure)
Miles J. Alexander (w/enclosure)

Checked my initials

Jim to [unclear]

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BY-LAWS OF THE ORKIN EXTERMINATING COMPANY, INC.
POLITICAL ACTION COMMITTEE

ARTICLE I - Name and Location

The name of this organization is the Orkin Exterminating Company, Inc. Political Action Committee (hereinafter referred to as "the Committee"). Its principal office shall be located at 2170 Piedmont Road, N.E., Atlanta, Georgia 30324.

ARTICLE II - Purpose

The Committee is established to promote and facilitate the accumulation of voluntary contributions from certain executive and administrative personnel of Orkin Exterminating Company, Inc. ("Orkin") for the support of various candidates for election to federal office in the United States. The Committee is dedicated to the support of candidates who have taken responsible positions on issues of importance to Orkin and on issues involving the private enterprise system and good government.

ARTICLE III - Enabling Clause

The Committee is established pursuant to the Federal Election Campaign Act of 1971 (Pub. L. 92-225), as amended, and the Federal Election Campaign Act Amendments of 1979 (Pub. L. No. 96-187). The Committee is not affiliated with any political party or with any specific candidate for election and may, within the limits of the applicable law, do all things necessary or desirable for the attainment of its stated purpose.

ARTICLE IV - Duration

The Committee shall have perpetual existence, but may be dissolved at any time either by the written consent of a majority of the members of the Committee or by direction of the President of Orkin Exterminating Company, Inc.

ARTICLE V - Officers

The Committee shall have a Treasurer, and an Assistant Treasurer, each of whom shall be appointed by the President of Orkin Exterminating Company, Inc. Such officers may be removed at any time by the appointing party and shall receive no consideration whatsoever for performing work for the Committee.

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ARTICLE VI - Duties of the Treasurer

The duties of the Treasurer shall include, but are not necessarily limited to, the following:

- (a) Advise the Committee of the total amount of funds held by the Committee, the disposition of disbursements by the Committee, and such other information as may be appropriate under the circumstances;
- (b) Keep and maintain all required records regarding contributions and expenditures and file all necessary reports with appropriate federal and state authorities;
- (c) Establish and maintain at least one checking account and such other accounts as he deems appropriate for the deposit of all contributions received and for the making of disbursements by the drawing of checks on such accounts;
- (d) Keep a detailed account of:
 - (1) All contributions made to or for the Committee;
 - (2) The full name, mailing address, occupation and principal place of business of every person making a contribution in excess of \$10 and the date and amount thereof;
 - (3) All expenditures made by or on behalf of the Committee;
 - (4) The full name, mailing address, occupation and principal place of business of every person to whom any expenditure is made, the date and amount thereof, and the name and address and office sought by each candidate on whose behalf such expenditure was made;
 - (5) Receipted bills stating the particulars for every expenditure made by or on behalf of the Committee;
- (e) Disburse funds at the direction of the Committee.

ARTICLE VII - Duties of the Assistant Treasurer

The Assistant Treasurer shall assume the duties and responsibilities of the Treasurer in the event of a temporary or permanent vacancy in the office or in the event the Treasurer is unavailable.

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ARTICLE VIII - Committee Members

The members of the Committee shall be appointed by the President of Orkin Exterminating Company, Inc. Such members may be removed at any time by the appointing party and shall receive no consideration whatsoever for performing work in connection with the Committee.

ARTICLE IX - Contributions

Contributions to the Committee shall be wholly voluntary and no direct or indirect pressure or coercion shall be exerted on any person to induce or compel a contribution. Contributions may not be solicited from any employees not deemed "executive or administrative personnel." No contribution shall be solicited or secured by job discrimination or financial reprisal, or the threat thereof, or as a condition of employment. Supervisors may not solicit contributions from direct subordinates.

The Committee shall accept only unrestricted contributions of not less than one dollar, in even dollar amounts, and no contribution shall be accepted which is earmarked for any candidate. Contributions shall be distributed by the Treasurer at the discretion of the Committee in accordance with the criteria set forth in Article X. The Treasurer shall return to the donor any contribution which exceeds in amount the limits set by applicable law.

Committee funds shall not be commingled with those of any individual or other organization nor shall they inure to the private benefit of any member of the Committee.

The Committee shall not directly or indirectly accept any contribution from Orkin Exterminating Company, Inc., or any other corporation; however, Orkin may pay the costs of establishing and administering the Committee and the cost of soliciting voluntary contributions.

ARTICLE X - Distribution of Funds

In determining how funds shall be distributed, the Committee shall consider the recommendations of knowledgeable persons, and additional factors including, but not necessarily limited to, the following:

- (a) The integrity and character of the candidate;
- (b) Whether the candidate holds a leadership or policy shaping position in his party or on a congressional committee or is likely to hold such a position in the future;

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- (c) The candidate's position and voting record on issues involving the private enterprise system and on economic and social questions of importance to Orkin;
- (d) The nature and strength of the candidate's opposition in primary and general elections;
- (e) Other sources of financial assistance available to the candidate.

ARTICLE XI - Dissolution

In the case of dissolution, the Treasurer shall return undistributed funds to the contributors readily identifiable, on either a pro rata basis or on any other basis deemed appropriate by the Treasurer, and any funds which are not identifiable may, prior to dissolution of the Committee, be distributed by the Committee to candidates for election to federal office in accordance with these By-laws. All documents necessary for dissolution may be executed by the Treasurer.

ARTICLE XII - Amendment

These By-laws may be amended by the majority vote of the members of the Committee.

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Federal Election Commission
ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS
 The FEC added this page to the end of this filing to indicate how it was received.

Hand Delivered Date of Receipt

USPS First Class Mail Postmarked

USPS Registered/Certified Postmarked (R/C)
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No Postmark

Overnight Delivery Service (Specify): Shipping Date
 Next Business Day Delivery

Received from House Records & Registration Office Date of Receipt

Received from Senate Public Records Office Date of Receipt

Received from Electronic Filing Office Date of Receipt

Other (Specify): Date of Receipt or Postmarked

Jms

PREPARER
(3/2005)

10/29/07

DATE PREPARED

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