

ASPLUNDH

ASPLUNDH TREE EXPERT CO.

708 BLAIR MILL ROAD, WILLOW GROVE, PA 19090-1784 • AREA CODE 215 • TELEPHONE 764-4200

Bradley Decker
Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
Washington, D.C. 20463

Re: Letter Dated April 13, 2005

Mr. Decker:

The Schedule A Itemized Receipts schedule for the period 10/1/04 to 12/31/04 is attached. It represents our contribution to the Republican National Committee which was returned to us. It was not a contribution to the PAC from a political party. The check was sent back because the Republican National Committee did not believe that the Asplundh Tree Expert Company Political Action Committee was entitled to make the contribution.

Sincerely yours,



Gerald A. Kosyla, Esq.
Tax Manager - Assistant Treasurer (Tax)
Asplundh Tree Expert Company
708 Blair Mill Road
Willow Grove, PA 19090

Enc.: Copy of FEC Letter dated 4/13/2005
Completed Schedule A
Copy of RNC Letter

RECEIVED
FEC MAIL
OPERATIONS CENTER
2005 APR 25 A 10:59A

25078801714

**SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER:
(check only one)

PAGE / OF /

<input type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input type="checkbox"/> 12	<input type="checkbox"/> 13	<input type="checkbox"/> 14	<input type="checkbox"/> 15	<input type="checkbox"/> 16	<input type="checkbox"/> 17
------------------------------	------------------------------	------------------------------	-----------------------------	-----------------------------	-----------------------------	-----------------------------	-----------------------------	-----------------------------

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

Asplundh Tree Expert Co. Political Action Committee

Full Name (Last, First, Middle Initial)

A. *Republican National Committee*

Mailing Address

310 FIRST STREET Southeast

City State Zip Code

Washington DC 20003

FEC ID number of contributing federal political committee.

C

Name of Employer

Occupation

Receipt For:

Primary General
 Other (specify) ▼

Aggregate Year-to-Date ▼

Date of Receipt

12 / 20 / 2004

Amount of Each Receipt this Period

19,000.00

Full Name (Last, First, Middle Initial)

B.

Mailing Address

City State Zip Code

FEC ID number of contributing federal political committee.

C

Name of Employer

Occupation

Receipt For:

Primary General
 Other (specify) ▼

Aggregate Year-to-Date ▼

Date of Receipt

_____ / _____ / _____

Amount of Each Receipt this Period

Full Name (Last, First, Middle Initial)

C.

Mailing Address

City State Zip Code

FEC ID number of contributing federal political committee.

C

Name of Employer

Occupation

Receipt For:

Primary General
 Other (specify) ▼

Aggregate Year-to-Date ▼

Date of Receipt

_____ / _____ / _____

Amount of Each Receipt this Period

SUBTOTAL of Receipts This Page (optional).....▶

TOTAL This Period (last page this line number only).....▶

19,000.00

19,000.00

25039901715



Republican
National
Committee

Membership Office
Finance Division

December 20, 2004

Asplundh Tree Expert Company PAC
708 Blair Mill Road
Willow Grove, PA 19090

Ladies and Gentlemen:

Here is a check for \$19,000 from the Republican National Committee (RNC).

This check represents a refund of two donations Asplundh Tree Expert Company PAC made to the RNC, a \$16,000 donation, which was deposited in our bank on October 14, 2004, and a \$3,000 donation, which was deposited in our bank on October 29, 2004.

Upon review, our lawyers determined the RNC probably should not have accepted these donations. It is questionable that your PAC might not be large enough to qualify to be a multi-candidate PAC.

Sincerely,

Susan L. Gazdo
Deputy Director

25038801716



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

April 13, 2005

Joseph Dwyer, Treasurer
Asplundh Tree Expert Co.
Political Action Committee (ATE PAC)
Blair Mill Road
Willow Grove, PA 19090

**Response Due Date:
May 13, 2005**

Identification Number: C00177741

Reference: Year End Report (10/1/04 – 12/31/04)

Dear Mr. Dwyer:

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 provide a Schedule A to support the entry reported on Line 16 of the Detailed Summary Page. All refunds received from federal candidates and committees must be itemized on Schedule A regardless of the amount of the refund. 2 U.S.C. §434(b)

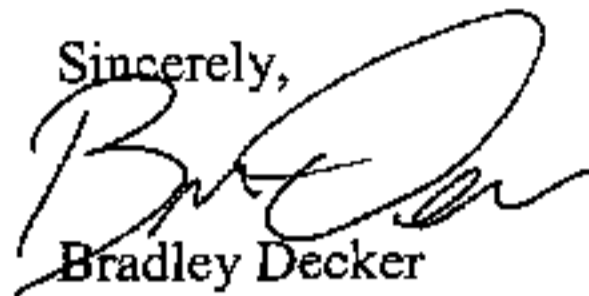
Unlike previous election cycles, you will not receive an additional notice from the Commission on this matter. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. **Requests for extensions of time in which to respond 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.

25038801717

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) 694-1301.

Sincerely,



Bradley Decker
Campaign Finance Analyst
Reports Analysis Division

213

25038801718

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.

<input type="checkbox"/> Hand Delivered	Date of Receipt
<input type="checkbox"/> USPS First Class Mail	Postmarked
<input checked="" type="checkbox"/> USPS Registered/Certified	Postmarked (R/C) 4/19/05
<input type="checkbox"/> USPS Priority Mail Delivery Confirmation™ or Signature Confirmation™ Label <input type="checkbox"/>	Postmarked
<input type="checkbox"/> USPS Express Mail	Postmarked
<input type="checkbox"/> Postmark Illegible	
<input type="checkbox"/> No Postmark	
<input type="checkbox"/> Overnight Delivery Service (Specify): Next Business Day Delivery <input type="checkbox"/>	Shipping Date
<input type="checkbox"/> Received from House Records & Registration Office	Date of Receipt
<input type="checkbox"/> Received from Senate Public Records Office	Date of Receipt
<input type="checkbox"/> Received from Electronic Filing Office	Date of Receipt
<input type="checkbox"/> Other (Specify):	Date of Receipt or Postmarked

[Signature] 4/25/05

PREPARER **DATE PREPARED**

25038801719