

December 19, 2008

Mr. Brian Bennett
Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street NW
Washington, DC 20463

Dear Mr. Bennett:

Huck PAC, Inc. (FEC ID# C00448373) is in receipt of your Request for Additional Information dated December 5, 2008, referencing our amended October Quarterly Report (7/1/08 - 9/30/08).

- With respect to the contributions identified in Item 1 of your letter, the Committee responds as follows:

The Committee took appropriate action to cure the excessive contributions within the time frame permitted by Commission regulations and issued refunds to the individuals prior to receipt of the Commission's inquiry. Specifically, the following actions were taken with respect to each of the contributors identified in your letter:

James E. Davison - On October 16, 2008, the Committee sent Mr. Davison a letter notifying him of the excessive contribution and requesting a reattribution of the excess to his spouse. We received no response to this letter. Accordingly, on November 17, 2008, the Committee issued Mr. Davison a refund of \$2,500, within the 60 days of the initial excess contribution made on September 19, 2008. This refund issue dated November 17, 2008 is noted on Committee's Amended October Quarterly Report (FEC Filing - 390198). Copies of the original letter and the refund check are attached.

Jack F. Staten - Your letter states that Mr. Staten had an aggregate contribution of \$6,000. Please note that his actual contribution on September 30, 2008, as stated on the Committee's October Quarterly Report, was for \$2,000, not \$2,500. Therefore, his aggregate contribution was \$5,500. On October 16, 2008, the Committee sent Mr. Staten a letter notifying him of the excessive contribution and requesting a reattribution of the excess amount. Mr. Staten contacted the Committee and requested a refund of the excess contribution, so the Committee issued Mr. Staten a refund of \$500 on November 28, 2008, within the 60 days of the initial excess contribution made on September 30, 2008. This refund issue dated November 28, 2008 is noted on Committee's Amended October Quarterly Report (FEC Filing - 390198). Copies of our correspondence and the refund check are attached.

- With respect to the expenditures identified in Item 2 of your letter, the Committee responds as follows:

The receipt of \$2,000 from the "Republican Party of Iowa" was a reimbursement for travel expenses incurred by the committee on behalf of the Republican Party of Iowa, not a refund of a previous contribution. The Committee paid Central Flying Services \$7,975.55 on July 17, 2008, and the Committee was reimbursed for a portion of that flight attributable to travel on behalf of the Republican Party of Iowa. We have adjusted the description of the reimbursement, as well as the description for the expenditure for which we were reimbursed on our Amended October Quarterly Report (FEC Filing - 392338).

- With respect to the expenditures identified in Item 3 of your letter, the Committee responds as follows:

ETEXT ATTACHMENT

The expenditure identified as "Event Venue Rental" was not made on behalf of a specific federal candidate. Huck PAC sponsored an event in honor of the Arkansas Delegation at the Republican National Convention. Therefore, no amendments are required with respect to lines 23 or 24 of the October Quarterly Report.

- With respect to the expenditures identified in Item 4 of your letter, the Committee responds as follows:

Payments labeled as "Direct Mail List Purchase," "Postage," and "Printing," were all related to the Committee's activities and were not undertaken on behalf of any specifically identified federal candidates. These expenditures did not contain express advocacy and did not constitute voter drive activity and therefore do not qualify as either an in-kind contribution or an independent expenditure. Therefore, no amendments are required with respect to lines 23 or 24 of the October Quarterly Report. Any public communications that, while not constituting express advocacy, referred to a federal candidate, were reported on line 21b of the October Quarterly report filed on October 15, 2008.

If you have any further questions or need further clarification, please do not hesitate to contact me.

Sincerely,

Bryan S. Jeffrey, Treasurer
Huck PAC, Inc.