

September 28, 2007

Federal Election Commission Washington, DC 20463

Attn: Daniel Buckley

Re: C00167684 Mid-Year Report (1/1/07-6/30/07)

This letter is in response to your letter dated September 5, 2007 requesting additional information.

Response to Item 1. The amendment will identify Country Cruzin and Popson Farms as partnerships and contributions attributed to each partner by a memo entry. T & T Farms contribution is 100% designated to Tony Mangus.

Contributions from Green Acres, M and M Farms, Mereness Farms, are also partnerships and the contributions were attributed to each partner by a memo entry in the original report.

Response to Item 2. Sidney Sugars corporate contribution was refunded.

Response to Item 3. As requested, the in-kind contributions made to Mark Udall, Norm Coleman and Sherrod Brown have been re-designated for the primary election. These in-kind contributions were for catering of events.

Response to Item 4. Schedule B, line 23 supporting information has been updated providing necessary address, office sought, state and congressional district, if applicable, for each contribution made.

Sincerely,

as signed Luther A. Markwart Treasurer American Sugarbeet Growers Association Political Action Committee