FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Martha K. Denbaas, Treasurer
PAC of Employees of Dow Chemical
(PACE)
%Comerica Bank - PAC Services
P.O. Box 75000
Detroit, MI 48275

MAY 16 2001

Identification Number: C00074096

Reference: 30 Day Post-General Report (10/19/00-11/27/00)

Dear Ms. Denbaas:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule B of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. 2 U.S.C. §441a(a) precludes a multicandidate committee and its affiliates from making a contribution to a candidate for federal office in excess of $5,000 per election.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If you have made an excessive contribution, you should notify the recipient and request a refund of the amount in excess of $5,000 and/or notify the recipient in writing of your redesignation of the contribution. In the best interest of your committee, all refunds and redesignations should be made within sixty days of the treasurer's receipt of the contribution(s).

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund or redesignation request sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo

entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. 11 CFR §110.1(b)

Although the Commission may take further legal action regarding the excessive contribution(s), your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,

Edward D. Ryan

Edward D. Ryan
Reports Analyst
Reports Analysis Division

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SCHEDULE B **ITEMIZED DISBURSEMENTS**

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

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FOR LINE NUMBER 23

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)

PAC OF EMPLOYEES OF DOW CHEMICAL (PACE)

A. Full Name, Mailing Address and ZIP Code ABRAHAM FOR SENATE 2000 26555 EVERGREEN ROAD SUITE 1200 SOUTHFIELD, MI 48076	Purpose of Disbursement SPENCER ABRAHAM U S SENATE MI Disbursement for: [ ] Primary [00] General [ ] Other:	Date (month, day, year) 10/24/00	Amount of Each Disbursement this Period 2,500.00 2D2
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: [ ] Primary [ ] General [ ] Other:	Date (month, day, year)	Amount of Each Disbursement this Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: [ ] Primary [ ] General [ ] Other:	Date (month, day, year)	Amount of Each Disbursement this Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: [ ] Primary [ ] General [ ] Other:	Date (month, day, year)	Amount of Each Disbursement this Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: [ ] Primary [ ] General [ ] Other:	Date (month, day, year)	Amount of Each Disbursement this Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: [ ] Primary [ ] General [ ] Other:	Date (month, day, year)	Amount of Each Disbursement this Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: [ ] Primary [ ] General [ ] Other:	Date (month, day, year)	Amount of Each Disbursement this Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: [ ] Primary [ ] General [ ] Other:	Date (month, day, year)	Amount of Each Disbursement this Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: [ ] Primary [ ] General [ ] Other:	Date (month, day, year)	Amount of Each Disbursement this Period
SUBTOTAL of Disbursements This Page (optional)			2,500.00

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SCHEDULE B **ITEMIZED DISBURSEMENTS**

Use separate schedule(s) for each category of the Detailed Summary Page	PAGE 1 OF 1
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NAME OF COMMITTEE (In Full)

Dow Corning Corporation Management Political Action Committee

	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Full Name, Mailing Address and ZIP Code Abraham for Senate 2000 900 2nd St. N E Ste. 114 Washington, DC 20002	fundraiser Disbursement for: [ ] Primary [x] General [ ] Other (specify)	10/20/00	500.00 EDR
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: [ ] Primary [ ] General [ ] Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: [ ] Primary [ ] General [ ] Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: [ ] Primary [ ] General [ ] Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: [ ] Primary [ ] General [ ] Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: [ ] Primary [ ] General [ ] Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: [ ] Primary [ ] General [ ] Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: [ ] Primary [ ] General [ ] Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: [ ] Primary [ ] General [ ] Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)	500.00
TOTAL This Period (last page this line number only)	500.00

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SCHEDULE B **ITEMIZED DISBURSEMENTS**

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

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NAME OF COMMITTEE (in Full)

PAC OF EMPLOYEES OF DOW CHEMICAL (PACE)

A. Full Name, Mailing Address and ZIP Code ABRAHAM FOR SENATE 2000 26555 EVERGREEN ROAD SUITE 1200 SOUTHFIELD, MI 48076	Purpose of Disbursement SPENCER ABRAHAM U S SENATE Disbursement for: [ ] Primary [GO] General [ ] Other:	Date (month, day, year) 09/14/00	Amount of Each Disbursement this Period 1,000.00 EOR
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: [ ] Primary [ ] General [ ] Other:	Date (month, day, year)	Amount of Each Disbursement this Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: [ ] Primary [ ] General [ ] Other:	Date (month, day, year)	Amount of Each Disbursement this Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: [ ] Primary [ ] General [ ] Other:	Date (month, day, year)	Amount of Each Disbursement this Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: [ ] Primary [ ] General [ ] Other:	Date (month, day, year)	Amount of Each Disbursement this Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: [ ] Primary [ ] General [ ] Other:	Date (month, day, year)	Amount of Each Disbursement this Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: [ ] Primary [ ] General [ ] Other:	Date (month, day, year)	Amount of Each Disbursement this Period
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I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: [ ] Primary [ ] General [ ] Other:	Date (month, day, year)	Amount of Each Disbursement this Period
SUBTOTAL of Disbursements This Page (optional)			1,000.00

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SCHEDULE B ITEMIZED DISBURSEMENTS

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

FOR LINE NUMBER 23

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NAME OF COMMITTEE (In Full)

PAC OF EMPLOYEES OF DOW CHEMICAL (PACE)

A. Full Name, Mailing Address and ZIP Code ABRAHAM FOR SENATE 2000 25555 EVERGREEN ROAD SUITE 1200 SOUTHFIELD, MI 48076	Purpose of Disbursement SPENCER ABRAHAM U S SENATE MI Disbursement for: [ ] Primary [X] General [ ] Other:	Date (month, day, year) 06/09/00	Amount of Each Disbursement this Period 1,000.00
B. Full Name, Mailing Address and ZIP Code UPTON FOR US ALL P.O BOX 490 2214 S. STATE STREET ST. JOSEPH, MI 49085	Purpose of Disbursement FRED UPTON U S HOUSE MI006 Disbursement for: [X] Primary [ ] General [ ] Other:	Date (month, day, year) 06/06/00	Amount of Each Disbursement this Period 500.00
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: [ ] Primary [ ] General [ ] Other:	Date (month, day, year)	Amount of Each Disbursement this Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: [ ] Primary [ ] General [ ] Other:	Date (month, day, year)	Amount of Each Disbursement this Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: [ ] Primary [ ] General [ ] Other:	Date (month, day, year)	Amount of Each Disbursement this Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: [ ] Primary [ ] General [ ] Other:	Date (month, day, year)	Amount of Each Disbursement this Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: [ ] Primary [ ] General [ ] Other:	Date (month, day, year)	Amount of Each Disbursement this Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: [ ] Primary [ ] General [ ] Other:	Date (month, day, year)	Amount of Each Disbursement this Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: [ ] Primary [ ] General [ ] Other:	Date (month, day, year)	Amount of Each Disbursement this Period
SUBTOTAL of Disbursements This Page (optional)			1,500.00

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NAME OF COMMITTEE (In Full)

DOW CORNING CORPORATION EMPLOYEES' POLITICAL ACTION COMMITTEE

Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Barcia for Congress P O Box 1243 Bay City, MI 48706	Primary Election Disbursement for: [X] Primary [ ] General [ ] Other (specify)	3/27/00	500.00
B. Abraham Senate 2000 P O Box 1957 Royal Oak, MI 48068	General Election Disbursement for: [ ] Primary [X] General [ ] Other (specify)	3/27/00	1,000.00 EDR
C. Ron Lewis for Congress P O Box 307 Elizabethtown, KY 42702	Primary Election Disbursement for: [X] Primary [ ] General [ ] Other (specify)	3/27/00	500.00
D. Ashcroft 2000 8229 Clayton Rd Suite 200 St Lewis, MO 63117	Primary Election Disbursement for: [X] Primary [ ] General [ ] Other (specify)	3/27/00	1,000.00
E. Frist 2000 4205 Hillsboro Rd Suite 306 Nashville TN 37215	Primary Election Disbursement for: [X] Primary [ ] General [ ] Other (specify)	3/27/00	1,000.00
F. Friends of George Allen P O Box 573 Richmond, VA 23218	Primary Election Disbursement for: [X] Primary [ ] General [ ] Other (specify)	3/27/00	1,000.00
G. Committee to Elect Nancy Johnson P O Box 1986 New Britain, CT 060533	Primary Election Disbursement for: [X] Primary [ ] General [ ] Other (specify)	3/27/00	500.00
H. Fletcher for Congress P O Box 4703 Lexington, KY 40544	Primary Disbursement for: [X] Primary [ ] General [ ] Other (specify)	3/27/00	750.00
I. Mike Rogers for Congress P O Box 581 Brighton, MI 48116	Primary Election Disbursement for: [X] Primary [ ] General [ ] Other (specify)	3/27/00	750.00

SUBTOTAL of Disbursements This Page (optional)	7,000.00
TOTAL This Period (last page this line number only)	

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NAME OF COMMITTEE (In Full)

Dow Corning Corporation Employees' Political Action Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Senator Spencer Abraham Abraham Senate 2000 26600 Telegraph Road, Suite 410 Southfield, MI 48034	fundraiser Disbursement for: [ ] Primary [X] General [ ] Other (specify)	6/23/99	1,000.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Dave Camp for Congress P. O. Box 423 Midland, MI 48640	fundraiser Disbursement for: [ ] Primary [X] General [ ] Other (specify)	6/21/99	1,200.00
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: [ ] Primary [ ] General [ ] Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: [ ] Primary [ ] General [ ] Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
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SUBTOTAL of Disbursements This Page (optional) 2,200.00

TOTAL This Period (last page this line number only) 2,200.00

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