



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

April 1, 2005

Leonard A. Cullo, Jr., Treasurer
H J Heinz Company Political Action Committee
60th Floor USX Tower 600 Grant St
Pittsburgh, PA 15219

Response Due Date:
May 2, 2005

Identification Number: C00336040

Reference: April Quarterly Report (1/1/04 – 3/31/04)

Dear Mr. Cullo:

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:

-Schedule B supporting Line 23 of your Amended 2004 Year End Report (11/23/04 – 12/31/04), received 3/9/05, discloses a redesignated contribution to a candidate for a contribution made during this reporting period. However, the funds were redesignated after the 2004 General election date(s) (see attached). Please note that contributions may not be redesignated for an election which has already occurred unless the funds are to be used to reduce a candidate committee's debts incurred during that election campaign. Further, a written request for a redesignation of a contribution must be provided to the treasurer within 60 days of the treasurer's receipt. 11 CFR §110.2(b)

If any apparently impermissible contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If the contribution(s) in question was redesignated for debt retirement, you should amend your report to indicate "debt retirement," along with the year of election.

Also, if the foregoing conditions for redesignations were not met within 60 days of the treasurer's receipt, your committee must obtain a refund. 11 CFR §110.2(b)

25038764763

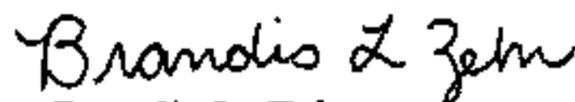
Please inform the Commission of your corrective action immediately in writing and provide a photocopy of any refund request sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received.

Although the Commission may take further legal action regarding this impermissible activity, your prompt action will be taken into consideration.

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. 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) 694-1148.

Sincerely,



Brandis L. Zehr
Campaign Finance Analyst
Reports Analysis Division

25038764764

Recipient Name	Redesignation Date	Amount	Election	Election Date
Citizens for Arlen Specter	12/31/04	\$2,500.00	General	11/2/04

25038764765

25038764766