



# Associated General Contractors of Iowa

*The Full Service Construction Association*

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September 10, 1997

Ms. Jennifer K. Wall  
Reports Analyst  
Federal Election Commission  
999 E. Street, N.W.  
Washington, D.C. 20463

Dear Ms. Wall,

This is in response to your letter dated August 27, 1997. In that letter you state that multi-candidate committees and their affiliates are precluded from making contributions to a candidate for federal office which, when combined, exceed \$5,000 per election. You provided disclosure disbursement records which indicate that on 8/9/96 the Associated General Contractors of America Political Action Committee contributed \$5,000 to the People for Lightfoot Committee and on 9/3/96 the Iowa Construction Industry PAC donated \$1,000 to the Lightfoot for Senate Committee (aka People for Lightfoot).

The Iowa Construction Industry PAC (ICI PAC) is organized for the purpose of making political contributions to Iowa candidates for federal office. It is neither affiliated with nor a subsidiary of the Associated General Contractors of America Political Action Committee (AGC/A PAC). The ICI PAC is governed by a committee made up of members of the Associated General Contractors of Iowa chapter. None of these individuals sit on the AGC/A PAC Committee. The ICI PAC does not make recommendations to the AGC/A PAC regarding contributions nor do we use any of their specific criteria in making ICI PAC decisions. In fact, the ICI PAC has occasionally endorsed candidates opposed to a candidate that was endorsed by the AGC/A PAC. We contend the Iowa Construction Industry PAC is not affiliated with the Associated General Contractors of America Political Action Committee.

Although the Associated General Contractors of America is made up of 101 chapters from throughout the 50 states, District of Columbia, and Puerto Rico, each chapter is totally autonomous with its own board of directors, dues structure, and construction

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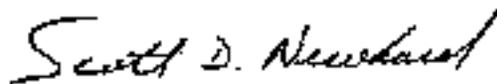
Ms. Jennifer Wall  
September 10, 1997  
Page 2

industry focus. Each chapter determines their own level, if any, of political action activity.

I hope this response is a satisfactory explanation regarding the autonomy of the Iowa Construction Industry PAC and that the Commission will close this matter. I appreciate the opportunity I had to discuss this with you on the phone and I look forward to receiving a copy of "Campaign Guide For Segregated Funds". If further explanation or documentation is needed please advise as the ICI PAC wishes to cooperate fully with the Commission.

You outlined other record keeping issues in your letter. I will deal with those matters under separate cover.

Sincerely,



Scott Newhard  
Director of Public Affairs

Federal Election Commission  
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