



SOLUTIA

REGISTRATION MAIL ROOM
Citizenship Fund

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Solutia Inc.
10300 Olive Boulevard
P.O. Box 66760
St. Louis, Missouri 63166-6760
Tel 314-674-7518

March 27, 1998

Ms. Monica Johnson
Reports Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: Identification Number C00328856

Dear Ms. Johnson:

I am in receipt of your letter dated March 13, 1998, seeking clarification of why our PAC initially registered as affiliated with the Monsanto Company Citizenship Fund and then later disaffiliated. As you have noted, on July 21, 1997, the Queeny Chemical Company Citizenship Fund filed a Statement of Organization which disclosed Monsanto Company Citizenship Fund as an affiliated committee. The PAC was established in anticipation of a spinoff of the Queeny Chemical Company from the Monsanto Company. However, at the time of the initial Statement of Organization, the Queeny Chemical Company was a subsidiary of the Monsanto Company. Thus, the Queeny Chemical Company Citizenship Fund was required to identify the Monsanto Company Citizenship Fund as affiliated.

Subsequent to our initial registration, the name of the Queeny Chemical Company was changed to Solutia Inc. Thus, as required, the name of the PAC was changed to reflect the name of the corporation. Finally, subsequent to the name change, Solutia Inc. was spun off from the Monsanto Company as anticipated. Thus, Solutia went from a wholly owned subsidiary of Monsanto to a completely independent corporation with its own officers, directors, and shareholders. As a result, and in accordance with Federal Election Commission Advisory Opinions 1996-23 and 1996-42, Solutia Inc. filed an Amended Statement of Organization

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notifying the Federal Election Commission that it was no longer affiliated with the Monsanto Company Citizenship Fund.

I hope this gives you the information you need.

Sincerely,




Kevin S. Cahill
Treasurer

cc: Lois B. Johnson, Treasurer
Monsanto Citizenship Fund

Federal Election Commission

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