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October 22 2009

Mr. Daniel T. Buckley
Senior Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

Re: America's Leadership PAC
FEC ID No. C00375584

Dear Mr. Buckley:

This is in response to your letter dated September 18, 2009 concerning the Mid Year Report (1/1/09-6/30/09) of the above referenced Committee.

You ask about payments for administrative expenses. America's Leadership PAC (the "Committee") is a small committee that has few administrative expenses. Currently, it has no office or paid staff and relies primarily on our law firm, Perkins Coie, a fundraising consultant, and volunteers to administer the Committee's activities. All of the expenses incurred to operate the Committee, including payments to our firm and the consultant, have been reported as federal operating expenditures on the Committee's FEC report.

You also ask about expenditures for "Catering," "Catering and Room Rental," "Fundraising Consulting Services," and "Reimbursement-Catering." These expenditures were for fundraising on behalf of America's Leadership PAC and were not made on behalf of any specifically identified federal candidate.

We hope that this information adequately addresses your questions. If you need any further information, please do not hesitate to contact the Committee.

Very truly yours,

Marc Elias
Counsel to America's Leadership PAC

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