

ACU-PAC
MID-YEAR 2009 - FEC DISCLOSURE REPORT

UNITEMIZED CONTRIBUTIONS

The Committee reported unitemized individual contributions of \$64,590.49 on Line 11(a)(ii), Column A of the Detailed Summary Page. These are due to the number of donors whose contributions were raised as part of the committee's direct mail fundraising campaign and represent those individuals whose donations aggregate to less than \$200.

BEST EFFORTS

Given that the majority of the contributions received are as a result of direct mail solicitations and despite the fact that each appeal includes a clear and conspicuous request for the contributor information as well as occupation and employer; many of the donors do not provide that information on the initial request. The committee has established procedures whereby the following steps are taken to satisfy the "best efforts" requirements: (i) within thirty (30) days of the receipt of the contribution, a letter is sent, clearly asking for the missing information, without soliciting a contribution; (ii) we inform the contributor of the requirements of federal law for the reporting of such information; and (iii) we provide a pre-addressed return envelope, a fax number and an email address. Upon receipt of the information the committee amends its reports to provide the new information.

ADMINISTRATIVE EXPENSES

The Committee has disclosed limited payments for administrative expenses. Presently, there are no salaried staff and no formal headquarters - the Treasurer, whose duties are solely related to accounting and compliance is paid a consulting fee. And a consulting firm has been contracted to provide the strategy; direct the fundraising; and handle any administrative tasks. For these reasons, the Committee has limited payments for traditional administrative expenses.

EXPENDITURE DESCRIPTIONS

The Committee has used the following descriptions for the Purpose of Disbursement: "DIRECT MAIL FUNDRAISING"; "DIRECT MAIL-CREATIVE"; "DIRECT MAIL-PRINTING"; "DIRECT MAIL-MAILSHOP" and "LIST RENTALS" to describe payments related to its direct mail fundraising activities. These fundraising efforts are for the benefit of the PAC and no other committee (Federal or otherwise). These solicitation expenditures do not represent public communications as defined by 11 CFR 100.26.