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Further to communications between counsel for Butterball LLC and the Commission's Reports Analysis Division analyst, this filing responds to the Commission's May 16, 2013 request for additional information. The Commission has requested clarification concerning the name of the separate segregated fund (SSF) and its relationship to the two corporations listed as connected organizations in the April 8, 2013 amended Statement of Organization. Butterball, LLC is a limited liability company that is equally owned by two corporations - Seaboard Corporation and Maxwell Farms of Indiana, Inc. In accordance with prior Commission guidance, the SSF has identified both of these corporations as its connected organizations and named the SSF the 'Butterball Political Action Committee, Inc.' (See e.g., Advisory Opinion 1997-13 (United Space Alliance Political Action Committee) and Advisory Opinion 2010-16 (EmblemHealth Services Company LLC).

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