

October 21, 2009

Ms. Jodi Winship
Senior Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

Re: All America PAC

FEC ID No. C00344788

Dear Ms. Winship:

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

1. You asked about the Committee's payments for administrative expenses. All America PAC (the ""Committee"") is a small committee that has few administrative expenses. Currently, it has one part-time employee and no rented office space. It relies primarily on its employee and volunteers to administer the Committee's activities. All of the expenses incurred to operate the Committee, including payments to its employee, have been reported as federal operating expenditures on the Committee's FEC reports.
2. You asked about expenditures for ""Catering"" and ""Fundraising Consulting Services."" These expenditures were for the Committee's own activities and were not made on behalf of any specifically identified federal candidate.
3. You also asked about expenditures for ""Mailing List"" and ""Printing."" These expenditures were made to conduct the Committee's own general activities and programs and did not contain express advocacy.

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

Sincerely,
Jerry Howe
Treasurer, All America PAC