

December 11, 2006

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 November 9th concerning the October Quarterly (7/1/06-9/30/06) of the All America PAC (the "Committee").

You inquire about expenditures for "Catering," "Catering and Office Expense," and "Fundrasing Consulting Services," and whether these expenses were made on behalf of a Specific federal candidate. These expenses were for the Committee's own activities and were not made on behalf of any specifically identified federal candidate.

You also asked about expenditures for "Printing," "Direct Mail Consulting Servies," "Direct Mail Services," "Direct Mail and Postage," "Postage," and "Communications Consulting and Expenses" and whether these expenditures were for public communications. These expenditures were made to conduct the Committee's own general activities and did not contain express advocacy or mention federal candidates

You also asked about an excessive contribution. The Committee has refunded the excessive portion and the refund will be reflexed on the Committee's next regulary scheduled report.

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,

Robert F. Bauer  
Counsel to All America PAC

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