



**WEBSTER, CHAMBERLAIN & BEAN, LLP**

APIA requests that no further action be taken for several reasons. First, APIA has taken action to ensure that such failure does not occur in the future by retaining my law firm to assist it with recordkeeping, determining whether and when reports needs to be filed, and the filing of any future FEC reports. Second, while some of the 48-Hour Reports were not filed, all of these independent expenditures were reported on the October Quarterly Report. Third, APIA has no prior reporting violations.

For all of the foregoing reasons, I respectfully request that the Commission find no reason to believe that APIA violated the Act, take no further action, and close the file.

Sincerely,



Heidi K. Abegg

1410020640-10