



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 2, 2003

Via Facsimile and Federal Express

Tony P. Trimble, Esquire
Matthew W. Haapoja, Esquire
Trimble & Associates, Ltd.
11700 Wayzata Boulevard
Minneapolis, MN 55305

RE: MUR 5181
Spirit of America PAC and Garrett Lott,
as treasurer
Ashcroft 2000 and Garrett Lott, as treasurer

Dear Messrs. Trimble and Haapoja:

On September 30, 2003, the Federal Election Commission found that there is probable cause to believe Spirit of America PAC ("PAC") and Garrett Lott, as treasurer, violated 2 U.S.C. §§ 441a(a)(2)(A) and 434(b), and Ashcroft 2000 and Garrett Lott, as treasurer, violated 2 U.S.C. §§ 441a(f) and 434(b), provisions of the Federal Election Campaign Act of 1971, as amended, in connection with excessive contributions made by the PAC to Ashcroft 2000 and associated reporting violations. On the same date, the Commission took no further action regarding Ashcroft 2000 and Garrett Lott, as treasurer, in connection with the reason-to-believe finding with respect to 2 U.S.C. § 441b(a).

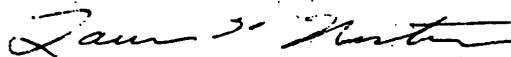
The Commission has a duty to attempt to correct such violations for a period of at least 30 days and no more than 90 days by informal methods of conference, conciliation, and persuasion, and by entering into a conciliation agreement with a respondent. If we are unable to reach an agreement after 30 days, the Commission may institute a civil suit in United States District Court and seek payment of a civil penalty.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission within ten days. I will then recommend that the Commission accept the agreement. Please make the check for the civil penalty payable to the Federal Election Commission.

Messrs. Trimble and Haapoja
MUR 5181
Page 2

If you have any questions or suggestions for changes in the enclosed conciliation agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Mary Taksar, the attorney assigned to this matter, at (202) 694-1650.

Sincerely,



Lawrence H. Norton
General Counsel

Enclosure
Conciliation Agreement

cc: Benjamin L. Ginsberg, Esquire (via facsimile and U.S. mail)

23 134 406 2745