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Antoinette Kitchen
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Federal Election Commission
999 E Street, NW
Washington, DC 20463

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2002 APR 19 P 2:47

Re: Leadership '98. FEC Id. No. C00165753

Dear Ms. Kitchen:

This letter is in response to your review of the 2001 Mid-year Report of our client, Leadership '98, FEC Id. No. C00165753 (the "Committee"). In particular, your letter to the Committee notes that the Committee's 2001 Mid-year Report "discloses limited administrative expenses . . . made for the purpose of operating a political committee."

You should be aware that, for the reporting period in question, the Committee was dormant and not operating as a political committee, except for the bare minimum functions necessary for a dormant political committee. These included accounting and bookkeeping services for the purpose of filing FEC reports, maintaining a back account and post office box, and storing of records. All such expenses have been fully and completely disclosed on the Mid-year Report.

In addition, while your letter is addressed to Leadership '02, this Committee did not officially change its name until after the filing of this report. Until such time, the Committee was still known as Leadership '98. It was during the year-end reporting period, subsequent to the filing of the Mid-year Report, that the Committee renewed operations as an active political committee. Consequently, it has disclosed significant administrative expenses on the applicable report for that period, i.e., the 2001 Year-end Report.

Accordingly, the Committee has no unreported administrative expenses for the time period covered by the 2001 Mid-year Report. I hope that this clarifies your questions. If you have any further questions, please feel free to contact the Committee's Controller, Miriam Zaleman, at 703-875-9650.

Sincerely,



Eric F. Kleinfeld
Counsel to the Committee

Federal Election Commission

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