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March 3, 1998

Mr. John D. Gibson
Assistant Staff Director
Reports Analysis Division
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: April 1997 Quarterly Report - ID: #C0017422

Dear Mr. Gibson:

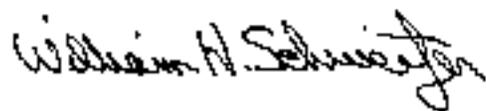
I am writing in response to your expressed concern that our April 1997 Quarterly Report discloses no payments for administrative expenses. It is not clear to me that Baker & Hostetler Political Action Committee ("Committee") has administrative expenses that would be reportable. The political committee does incur administrative expenses arising from legal and accounting services. These services are provided to the Committee by the lawfirm of Baker & Hostetler LLP. The services are performed by regular employees or members of the partnership, do not directly support the election of any specific candidate for federal office and are for the purpose of maintaining the records needed for compliance with the Federal Election Campaign Act. As can be seen from our report, the Committee's operations are modest - the Committee has no employees, no consultants and no office or facility other than the files maintained to keep its financial records. The Committee has no fundraising events or program. Funds for the Committee are solicited directly by members of the lawfirm of other members. The use of Baker & Hostetler's facilities by any individual working on behalf of the Committee would be occasional, isolate and incidental as defined in the Commission's regulations. I do not believe that any individual associated with the Committee has ever used the facilities of the firm for more than 4 hours in any month, or more than 1 hour per week on Committee activity other than in compliance-related activities.

Pursuant to your direction, the Committee will no longer disclose individuals whose aggregated total contributions do not exceed \$200 in a calendar year.

Mr. John D. Gibson
March 3, 1998
Page 2

If you should have any additional questions in regard to this matter, please do not hesitate to contact me.

Sincerely yours,

A handwritten signature in cursive script that reads "William H. Schweitzer". The signature is written in dark ink and is positioned above the printed name.

William H. Schweitzer

WHS/rvn

Federal Election Commission

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