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June 5, 2000

VIA MESSENGER

Ms. Angel L. Williamson
Reports Analysis Division
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: Letter Dated May 25, 2000 – Winston & Strawn PAC (#C00282921)

Dear Ms. Williamson:

On Friday, June 2, 2000, I received the above-referenced letter from Mr. John D. Gibson regarding amended reports for the Winston & Strawn Political Action Committee, dated May 15, 2000, covering the following periods: Mid-Year 1999; Year End 1999; January 2000; February 2000; and March 2000 (collectively, the "amended reports"). Although Mr. Gibson's letter does not reference the PAC's April 2000 report, this response should be applied to that report as well given that the issue raised in his letter applies to the April 2000 report as well.

As we discussed on the telephone this morning, the format for the amended reports and the April 2000 report, with respect to administrative expenses, was based entirely on your recommendation during telephone conversations you and I had in early May. Accordingly, it came as a surprise to learn that the amended reports were somehow inadequate. Nevertheless, based on our conversation last Friday, you have assured me that this letter will definitively satisfy the Commission's concerns vis-à-vis administrative expenses for the amended reports and the April 2000 report.

In response to Mr. Gibson's specific question, and as is demonstrated by the Schedule D forms attached to the amended reports and the April 2000 report, the Winston & Strawn PAC is paying its own administrative expenses; expenses are not being paid by a connected organization. Furthermore, the amounts listed on each of those schedules represent expenses for rent, utilities, telephone service, office equipment and supplies. Prospectively, and in addition to these categories, the PAC will also pay salary expenses for an employee who will handle administrative tasks (such as fundraising, newsletters, etc.) for the PAC. Prior to the hiring of this individual, there was no one serving in this role for the firm.

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Indeed, the only administrative expenses incurred by the PAC have been incidental to the work of the Legal Counsel to the PAC, which was performed exclusively in order to comply with the Commission's reporting requirements. As you are aware, the value of the Legal Counsel's time in this regard has been and will continue to be reported on a memo entry basis.

If for any reason this letter does not end this inquiry, please call me at 202-371-5954. The intent of the Winston & Strawn PAC has been to comply fully with the Commission's reporting rules. I regret the apparent miscommunication regarding the amended reports and the April 2000 report that necessitated this letter, and thank you for your patience and assistance.

Very truly yours,



Gregory K. Smith
Legal Counsel
Winston & Strawn PAC

GKS:vdI

Federal Election Commission

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