



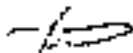
HUPAC

2000 North 14th Street
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(703) 276-3805
(703) 841-7797 (fax)

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FEC MAIL ROOM

2000 SEP 26 A 9 14

To: Mr. Donald L. Averett
Reports Analyst
Federal Elections Commission

From: Kevin P. Corcoran 
HUPAC Treasurer

Date: September 21, 2000

Ref: Response to Mid-Year Report (1/1/99 - 6/30/99) for C00283135

The following is HUPAC's response to your letter dated September 13, 2000, regarding the Commission's preliminary review of our report dated 1/1/99 - 6/30/99. I understand that on September 15, 2000, Steve Stoupa, CPA of my office spoke with you regarding these and similar issues. The substance of your conversation was as follows:

- Schedule A of the aforementioned report contains no contributions drawn from corporate accounts. HUPAC has very specific procedures surrounding its cash receipts function. All checks received are scrutinized to ensure that they are from non-corporate, member sources. Our membership base is largely comprised of independent, small-group health insurance agents. Many of these agents are sole proprietors. In the mailing address section of Schedule A, we disclose the business address of all member contributions that meet FEC disclosure limits as a matter of procedure. We therefore feel that no corrective action need be taken regarding these receipts.
- HUPAC strives to provide accurate and fair disclosure of all Senate and House contributions listed on Schedule B. All Senatorial contributions are clearly listed as such. While our disclosure of political contributions to individuals seeking House seats do not clearly state "House", we do disclose the district and state seat that the individual is seeking, under the assumption that the reader understands the nature of the contribution. Please note that for fiscal year 2000, all reports filed have utilized FEC software, disclosing all contributions the preferred manner. In the future, we will distinctly report all Senate/House contributions.

Should more information be necessary, please feel free to contact me at (703) 276-3800.

Federal Election Commission

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The Commission has added this page to the end of this filing to indicate how it was received.

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