

ETEXT ATTACHMENT

10/22/2002 11 : 19

October 22, 2002

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

Re:

Response to October 3, 2002 RQ-3 Letter

Dear Mr. Gibson:

This letter responds to your RQ-3 letter, dated October 3, 2002. In this letter, you indicate that the Winston & Strawn Political Action Committee ("Winston PAC") (Identification Number: C00262921) has failed to respond adequately to an August 14, 2002 letter from the Federal Election Commission ("FEC").

As noted in letters electronically filed by Winston PAC's with its amended May Monthly report, Winston PAC has addressed the apparent contribution in excess of the limits set by the Federal Election Campaign Act. Based on its unamended monthly report, Winston PAC failed to account for a refund from Ridgewells Catering, which otherwise would have constituted an in-kind contribution to the campaign of Senator Max Baucus (D-MT). As requested by the FEC in its August 14, 2002 letter, Winston PAC submitted an FEC Form 99 with this clarifying information on August 28, 2002. This clarifying information was accepted by the FEC and assigned the following reference number: FEC-48186. Although Winston PAC previously has submitted these letters to the FEC, it resubmitted these letters on October 21, 2002, in response to the October 3, 2002 RQ-3 correspondence.

Winston PAC amended both its July and August Monthly Reports to reflect the Ridgewells Catering refund. Because the actual refund was received on June 24, 2002, Winston PAC's July Monthly Report reflected the refund. As required by Federal Election Commission regulations, this refund was disclosed on Schedule B supporting Line 23 of the report covering the period during which the refund was received, which in this instance was the July Monthly Report. The July Monthly Report amendment was accepted by the FEC and assigned the following reference number: FEC-48372. In order to correct any year-to-date errors, the Winston PAC also amended its August Monthly Report so that the year-to-date totals would be accurate. This amended August Monthly Report was accepted by the FEC and assigned the following reference number: FEC-48375. Consequently, the Winston PAC believes it has adequately addressed the issues raised in the FEC's August 14, 2002 letter and indicated that it had not exceeded the contributions limits set by the Federal Election Campaign Act. Furthermore, it corrected all subsequent monthly reports as necessary.

If the FEC requires any additional information concerning the aforementioned refund, please do not hesitate to contact me at the number listed above.

UUUUUUSincerely,

UUUUUWesley D. Bizzell, Esq.