

ROBINS, KAPLAN, MILLER & CIRESI, L.L.P.
ATTORNEYS AT LAW

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February 9, 1998

Mr. Donald L. Averett
Senior Reports Analyst
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: RKM&C PAC - 1997 Mid-Year Report
I.D. No.: C00275909

Dear Mr. Averett:

Thank you for taking the time to speak with my assistant, Scott Diamond, regarding your letter dated January 30, 1998. Your letter raised a question concerning contributions from the Robins, Kaplan, Miller & Ciresi, L.L.P. partnership which might require a detailed listing breaking out the contributions based upon the percentage of ownership each partner has in the firm.

For the time period in question (01/01/97 to 06/30/97), the PAC received \$2,000.00 from Robins, Kaplan, Miller & Ciresi, L.L.P. in which there were sixty-six (66) equity partners. In taking the partners with the greatest equity share in the partnership, their attributable contribution totaled approximately \$50.00. As we understand the regulations, and as you confirmed during your conversation with Mr. Diamond, contributions from partnerships in which each individual's contribution falls below the \$200.00 level are not required to be separately identified on Schedule A.

Accordingly, we did not prepare such a break down for the Robins, Kaplan, Miller & Ciresi L.L.P. partnership for the PAC's mid-year report. We note that the same equation and scenario applies to our year-end 1997 filing in which we received a \$1,000.00 contribution from the partnership.

Mr. Donald L. Averett
February 9, 1998
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If you have any remaining concerns regarding our filing, or if we have misinterpreted the regulations, please feel free to contact me.

Sincerely,

ROBINS, KAPLAN, MILLER & CIRESI L.L.P.



Harold E. Mesirov

HEM/sd

Federal Election Commission

**ENVELOPE REPLACEMENT PAGE
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