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COMMISSION MAIL ROOM

**Robins, Kaplan PAC**

1801 K Street, N.W.  
Suite 1200  
Washington, DC 20006

2000 MAY 10 P 12:26

May 10, 2000

**By Hand**

Ms. Antoinette Kitchen  
Reports Analyst  
Reports Analysis Division  
Federal Election Commission  
999 E Street, N.W.  
Washington, DC 20463

Re: Clarification of Administrative Costs; Amended Schedule B for Line 23

Dear Ms. Kitchen:

Thank you for taking the time to discuss the details of your April 26, 2000 letter with our Assistant Treasurer Scott Diamond. As he informed you, we have been reporting our administrative costs since 1998 in a manner consistent with the specific direction of Mr. Donald Averett, a senior reports analyst with the Federal Election Commission. This letter serves to clarify our administrative expenses for the new two year election cycle.

This letter verifies that all expenses made for the purpose of operating our PAC have been adequately disclosed. Payment for office space where the PAC records are maintained is based on the law firm's current lease arrangement (calculated per square foot) and paid on a pro rata basis with costs accruing on a per day basis for each day any PAC activities are undertaken. This formula also takes into consideration utilities service. Telephone and facsimile services, postage, supplies, copying and messenger/overnight services, as well as any other out-of-pocket expenses, are tracked by use of a firm billing number established for the exclusive use of the PAC. The law firm reports these expenses to the PAC "as is" without any discount or write-off of any monies.

As for the recording of personnel time spent on PAC matters, such activities undertaken by our assistant treasurer and our secretary accrue at an hourly rate, with such hourly rate accurately reflecting those employees salaries plus the typical 20 % added for overhead costs and benefits they receive as employees of the law firm of Robins, Kaplan, Miller & Ciresi L.L.P. Regarding my time spent on PAC activities, the majority of such time falls under the legal services exemption and is, thus, entered as a "memo" entry on the PAC reports. All other time I may spend on PAC matters is done so voluntarily and no costs are incurred by the firm.

Ms. Antoinette Kitchen  
May 10, 2000  
Page 2

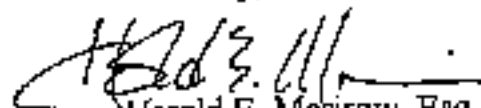
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The second portion of your letter requested that the PAC file amended Schedule B forms supporting Line 23 for itemized disbursements. The attached reports for mid-year 1999, year-end 1999 and first quarter 2000 have been amended and now accurately reflect the office sought, state and congressional district, where applicable, for each contribution made to a candidate or political committee.

We hope this information provides the necessary clarification sought; however, should you have any remaining questions, please do not hesitate to contact me at 202-736-2700. Should I be unavailable, Scott Diamond may be reached at 202-736-2611.

Sincerely,



Harold E. Mesirov, Esq.  
Treasurer  
Robins, Kaplan PAC

# REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee  
(Summary Page)

USE FEC MAILING LABEL OR TYPE OR PRINT

RECEIVED  
FEDERAL ELECTION  
COMMISSION MAIL ROOM

2000 MAY 10 P 12-26

1. NAME OF COMMITTEE (in full) Robins, Kaplan, Miller & Ciresi L.L.P. PAC	
ADDRESS (number and street) <input type="checkbox"/> Check (if different than previously reported) 1801 K Street, N.W., Suite 1200	
CITY, STATE and ZIP CODE Washington, D.C. 20006-1301	
	2. FEC IDENTIFICATION NUMBER C00275909
	3. <input type="checkbox"/> This committee has qualified as a multicandidate committee. (see FEC FORM 1M)

## 4. TYPE OF REPORT

- (a)  April 15 Quarterly Report
- July 15 Quarterly Report
- October 15 Quarterly Report
- January 31 Year End Report
- July 31 Mid Year Report (Non-election Year Only)
- Termination Report
- Monthly Report Due On:
- |                                      |                                       |                                      |
|--------------------------------------|---------------------------------------|--------------------------------------|
| <input type="checkbox"/> February 20 | <input type="checkbox"/> June 20      | <input type="checkbox"/> October 20  |
| <input type="checkbox"/> March 20    | <input type="checkbox"/> July 20      | <input type="checkbox"/> November 20 |
| <input type="checkbox"/> April 20    | <input type="checkbox"/> August 20    | <input type="checkbox"/> December 20 |
| <input type="checkbox"/> May 20      | <input type="checkbox"/> September 20 | <input type="checkbox"/> January 31  |
- 12-Day Pre-Election Report for the \_\_\_\_\_ (Type of Election) election on \_\_\_\_\_ in the State of \_\_\_\_\_
- 30-Day Post-Election Report following the General Election on \_\_\_\_\_ in the State of \_\_\_\_\_
- (b) Is this Report an Amendment?  YES  NO

SUMMARY	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period <u>01/01/99</u> through <u>06/30/99</u>		
6. (a) Cash on Hand January 1, 1999		\$ 6,621.62
(b) Cash on Hand at Beginning of Reporting Period	\$ 6,621.62	
(c) Total Receipts (from Line 19)	\$ 5,395.52	\$ 5,395.52
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 12,017.14	\$ 12,017.14
7. Total Disbursements (from Line 20)	\$ 10,895.52	\$ 10,895.52
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 1,121.62	\$ 1,121.62
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	\$ 0.00	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9630 Local 202-694-1100
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	\$ 0.00	

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer Harold E. Mesirov, Esquire	Date 5/10/00
Signature of Treasurer 	

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

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**FEC FORM 3X**  
(revised 9/93)

**SCHEDULE B**

**ITEMIZED DISBURSEMENTS**

Use separate schedule(s) for each category of the Detailed Summary Page

PAGE 1 OF 1  
FOR LINE NUMBER 23

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

Robins, Kaplan, Miller & Ciresi L.L.P. PAC

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Conrad for Senate Committee 420 C Street, N.E. Washington, D.C. 20002	Kent Conrad, Senate N.D. Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	02/19/99	\$1,000.00
Oberstar for Congress P.O. Box 465 Duluth, MN 54802	Jim Oberstar, House MN - 8D Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	02/24/99	\$1,000.00
Luther for Congress 1399 Geneva Avenue North Suite 103 Oakdale, MN 55128	Bill Luther, House MN - 6D Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	03/18/99	\$2,000.00
Kennedy for Senate 2000 426 C Street, N.E. Washington, D.C. 20002	Ted Kennedy, Senate MA Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	04/20/99	\$2,000.00
Democratic Senatorial Campaign Cmte. 430 South Capitol Street, S.E. Washington, D.C. 20003	Contribution Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	05/05/99	\$2,500.00
Dianne Feinstein for U.S. Senate P.O. Box 75156 Washington, D.C. 20013	Dianne Feinstein, Senate, CA Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	06/15/99	\$1,000.00
Northern Lights PAC 1537 Shipview Road Annapolis, MD 21401	PAC Contribution Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	06/25/99	\$1,000.00
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional) .....

TOTAL This Period (last page this line number only) .....

\$10,500.00

Federal Election Commission

**ENVELOPE REPLACEMENT PAGE  
FOR INCOMING DOCUMENTS**

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

<input checked="" type="checkbox"/> Hand Delivered	Date of Receipt <i>5-10-00</i>
<input type="checkbox"/> First Class Mail	POSTMARKED
<input type="checkbox"/> Registered/Certified Mail	POSTMARKED
<input type="checkbox"/> No Postmark	
<input type="checkbox"/> Postmark Illegible	
<input type="checkbox"/> Received from the House office of Records and Registration	Date of Receipt
<input type="checkbox"/> Received from the Senate Office of Public Records	Date of Receipt
<input type="checkbox"/> Other ( Specify):	Postmarked _____ and/or Date of Receipt
<input type="checkbox"/> Electronic Filing	
<i>for</i> PREPARER	<i>5-10-00</i> DATE PREPARED