

# SSL Political Action Committee

A Multicandidate Committee  
FEC No. C00297184

180 Maiden Lane - 34<sup>th</sup> FL  
New York, New York 10038-4982

RECEIVED  
FEDERAL ELECTION  
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SEP 22 11 05 AM '98

212 806 5851  
Fax: 212 806 6006

Jamca L. Burns, Treasurer

September 18, 1998

Certified Mail  
Z 222 967 628

Mr. Edward D. Ryan  
Reports Analyst  
Reports Analysis Division  
Federal Election Commission  
Washington, D.C. 20463

Re: I.D. No. C00297184  
July Quarterly Report (4/1/98 - 6/30/98)

Dear Mr. Ryan:

I received your letter dated September 16, 1998 concerning our most recent Form 3X filing. A copy of your letter is attached. If, after reviewing this response letter, you have further questions concerning our reporting, please do not hesitate to contact me in writing or by telephone.

Before I respond to the individual items in your letter, I would like to give you some background information which may help you better understand our position. SSL Political Action Committee was formed at the direction of the partners of Stroock & Stroock & Lavan LLP, a law firm based in New York City. Since the law firm is a partnership and not a corporation or labor organization, the PAC is not a "connected organization" as defined in the regulations. However, the PAC does not solicit funds from the general public or, in fact, from anyone other than the partners of Stroock. Consequently, the PAC's administrative costs are negligible, consisting primarily of expenses related to our FEC filings. However, as small as these may be, it appears that I have not reflected these expenses in my most recent filing. Therefore, I will promptly amend our Form 3X filing to correctly reflect these expenses.

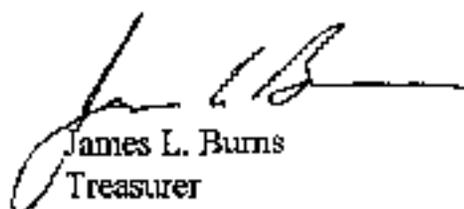
With respect to our contribution to the Campaign of Benjamin Gilman, I see that I mistakenly designated the most recent contribution as for the primary. The amendment will reflect a redesignation of the most recent contribution as being for the general election and I will so advise Citizens for Gilman.

Mr. Edward D. Ryan  
Federal Election Commission  
Page 2  
September 18, 1998

I anticipate filing the amendment on or before September 25, 1998.

Thank you for bringing these matters to my attention.

Very truly yours,



James L. Burns  
Treasurer

Enclosure



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

James L. Burns, Treasurer  
SSL Political Action Committee  
180 Maiden Lane - 34<sup>th</sup> Floor  
New York, NY 10038

SEP 16 1998

Identification Number: C00297184

Reference: July Quarterly Report (4/1/98-6/30/98)

Dear Mr. Burns:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule B of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. 2 U.S.C. §441a(a) precludes a multicandidate committee and its affiliates from making a contribution to a candidate for federal office in excess of \$5,000 per election.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If you have made an excessive contribution, you should notify the recipient and request a refund of the amount in excess of \$5,000 and/or notify the recipient in writing of your redesignation of the contribution. In the best interest of your committee, all refunds and redesignations should be made within sixty days of the treasurer's receipt of the contribution(s).

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund request sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. 11 CFR §110.1(b)

Although the Commission may take further legal action regarding the excessive contribution(s), your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

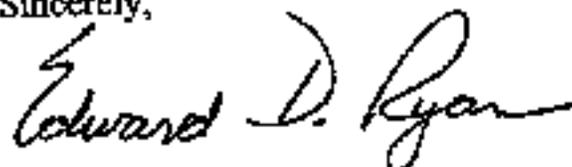
-Your report discloses no payments for administrative expenses. Administrative expenses are payments made for the purpose of operating a political committee including, but not limited to, rent, utilities, salaries, telephone service, office equipment and supplies. Any such payments to a person aggregating in excess of \$200 in a calendar year must be disclosed on Schedule B, supporting Line 21(b) of the Detailed Summary Page. 2 U.S.C. §434(b)(5) If these expenses are being paid by a connected organization, your Statement of Organization must be amended to reflect this relationship. 2 U.S.C. §433(b)(2) In addition, if expenses have been incurred but not paid in a reporting period, the activity should be disclosed as a debt on Schedule D, if the obligation is \$500 or more, or outstanding for sixty days or more. 11 CFR §104.11

Any goods or services provided to your committee by a person, except volunteer activity (i.e., a person's time), would be considered an in-kind contribution from that person, and would be subject to the disclosure requirements of 2 U.S.C. §434(b)(3) and 11 CFR §104.13, and the limitations and prohibitions of 2 U.S.C. §§441a and 441b.

Clarification regarding administrative expenses should be disclosed during each two year election cycle beginning with the first report filed in the non-election year. Please verify that all expenses referenced above (i.e., rent, salaries, utilities, etc.) have been adequately disclosed. If these services have been provided by volunteers, please confirm this in writing.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 694-1130.

Sincerely,



Edward D. Ryan  
Reports Analyst  
Reports Analysis Division

**SCHEDULE B**

**ITEMIZED DISBURSEMENTS**

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

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)**  
**SSL Political Action Committee**

Full Name, Mailing Address, and ZIP Code	Purpose of Disbursement (House - NY - 20) contribution	Date (month, day, year)	Amount of Each Disbursement This Period
Citizens for Gilman P.O. Box 3001  Middletown NY 10940	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	04/08/1998	5000.00  <i>for</i>
Friends of Maurice Hinchey Suite 6H 525 W. 49th St New York NY 10019	Purpose of Disbursement (House - NY - 26) contribution  Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 04/28/1998	Amount of Each Disbursement This Period 500.00
Engel for Congress P.O. Box 60  Bronx NY 10463	Purpose of Disbursement (House - NY - 17) contribution  Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 05/18/1998	Amount of Each Disbursement This Period 500.00

**SUBTOTALS** of Disbursements This Page (Optional) .....

**TOTALS** This Period (last page this line number only) .....

5000.00

**SCHEDULE B**

**ITEMIZED DISBURSEMENTS**

Use separate schedule(s) for each category of the Detailed Summary Page	PAGE	OF
	1	1
FOR LINE NUMBER		23

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NAME OF COMMITTEE (in Full)  
**SSL Political Action Committee**

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Campaign America 6263 North Scottsdale Rd. Suite 292 Scottsdale AZ 85250	CNTRB to Federal Committee Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) PAC	10/9/97	\$1,500
B. Full Name, Mailing Address and ZIP Code Citizens for Gilman P.O. Box 3001 Middletown, New York 10940	Purpose of Disbursement Benjamin Gilman House, 20th (NY) Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) 22?	10/10/97	\$1,500 <i>EDR</i>
C. Full Name, Mailing Address and ZIP Code Vito Fossella for Congress 1270 Clove Rd. Staten Island, NY 10301	Purpose of Disbursement Vito Fossella House, 13th (NY) Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/21/97	\$1,000
D. Full Name, Mailing Address and ZIP Code Friends of Sen. D'Amato P.O. Box 888 Mineola, NY 11501	Purpose of Disbursement Al D'Amato Senate, NY Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	12/19/97	\$1,000
E. 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
F. 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
G. 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
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)	\$5,000
TOTAL This Period (last page this line number only)	\$5,000

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 type="checkbox"/> Hand Delivered	Date of Receipt
<input type="checkbox"/> First Class Mail	POSTMARKED
<input checked="" type="checkbox"/> Registered/Certified Mail	POSTMARKED 9-18-98
<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>sep</i> PREPARER	9-22-98 DATE PREPARED