

January 29, 2002

Mr. Scott Walker, Reports Analyst
 Reports Analysis Division
 Federal Election Commission
 999 E Street NW
 Washington, D.C. 20463
 Tel. (202) 694-1130

Dear Mr. Walker:

Regarding the letter received by this office on December 19, 2001, please find the following clarifications:

Administrative expenses of the Holland & Knight Committee for Effective Government such as office space and other costs are incidental to the operation of the law practice. The firm's political action committee ("PAC") does not result in additional expenses such as office space, telephone service, utilities, office equipment, etc. Further, no expenses of the Holland & Knight Committee for Effective Government are being paid by a "connected organization."

The PAC does not have any employees. Those employees working on PAC activities do not enjoy any additional compensation for the incidental work the PAC requires. There is no office space set aside for PAC activities. The PAC does not have postage expenses nor does it conduct mass mailings. Solicitation is generally done in person at the annual meeting of the partners. Accordingly, all expenses are incidental to the operation of the law practice.

In fact, a key reason administrative costs for the PAC have been kept to a minimum is because the PAC currently leases Aristotle Publishing's PAC software package. This software is a PAC management system that automates a wide range of PAC functions, including the preparation and electronic filing of federal compliance reports with the FEC. As you will see on the attached Schedule B from the Mid-Year 2001 FEC Report, \$5,816.25 was paid to Aristotle Publishing and reported as an operating expenditure for the PAC.

Please call me at (617) 306-2044 if I may provide you with any further information.

Sincerely,



Cheryl Cronin
 Treasurer

2059 Pennsylvania Avenue, N.W. • Suite 100 • Washington, D.C. • 20006-6801

Tillie K. Fowler
 Co-Chairman

Janet R. Studley
 Co-Chairman

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 FEC MAIL ROOM
 2002 JAN 29 P 3 11

**SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS**

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

FOR LINE NUMBER:
(check only one)

PAGE 123 / 157

21b 22 23 24 25
 26 27 28* 28b 28c 29

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)

Holland & Knight Committee for Effective Government

Full Name (Last, First, Middle Initial)

A. Aristotle Publishing, Inc.

Date of Disbursement

06 / 15 / 2001

Mailing Address

205 Pennsylvania Avenue, S.E.

City

Washington

State

DC

Zip Code

20003-

Amount of Each Disbursement this Period

5916.25

Purpose of Disbursement

Tech support/software programming

Candidate Name

Category/
Type

Tech support/software programming

Office Sought:

House

Senate

President

Disbursement For:

Primary

General

Other (specify) ▼

State:

District:

Transaction ID: 0727200159E512

Full Name (Last, First, Middle Initial)

B. Deluxe

Date of Disbursement

06 / 18 / 2001

Mailing Address

P.O. Box 742572

City

Cincinnati

State

OH

Zip Code

45274-2572

Amount of Each Disbursement this Period

147.08

Purpose of Disbursement

Computer Checks

Candidate Name

Category/
Type

Computer Checks

Office Sought:

House

Senate

President

Disbursement For:

Primary

General

Other (specify) ▼

State:

District:

Transaction ID: 0727200159E514

C.

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2002 JAN 29 P 3 11

SUBTOTAL of Receipts This Page (optional)

5963.33

TOTAL This Period (last page this line number only)

5963.33



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Richard M. Gold, Treasurer
Holland & Knight Committee for Effective
Government
2099 Pennsylvania Avenue, NW, Suite 100
Washington, DC 20006

DEC 19 2001

Identification Number: C00171330

Reference: Mid-Year Report (1/1/01-6/30/01)

Dear Mr. Gold:

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:

-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(s) 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 response or 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. Electronic filers must file amendments in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely



Scott Walker
Reports Analyst
Report Analysis Division

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>1-29-02</i>
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<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
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<i>JMP</i> PREPARER	<i>1-29-02</i> DATE PREPARED