

# **Carolyn's PAC** #1A, 49 East 92nd Street, New York, NY 10128

A Non-Connected Political Action Committee, Clinton H.W. Maloney, Treasurer, Andrew R. Tulloch, Esq., Counsel

June 22, 2000

**Via United States Postal Service**

**Next Day Express Mail**

John D. Gibson, Assistant Staff Director

Reports Analysis Division

Federal Election Commission

999 E. Street, N.W.

Washington, D.C. 20463

**Reference: Year End Report (7/1/99-12/31/99), RQ-2- RQ-6  
Carolyn's PAC, FEC ID# C00341990**

Dear Mr. Gibson:

In response to the above referenced inquiry, on behalf of CAROLYN'S PAC, the undersigned responds as follows to the Commission's letter.

## **ADMINISTRATIVE EXPENSES & IN KIND CONTRIBUTIONS:**

1. The Committee does not have a stationary location or a direct telephone number. The address listed on the Committee's Statement of Organization is for registration, compliance, and banking purposes. The Committee is a leadership PAC and as such the primary activity is to receive qualified and permissible contributions and make contributions in accordance with the provisions of the FECA.

The administrative functions of the Committee and its operations are conducted out of the Law Offices of Andrew R. Tulloch, Esq., Suite 1803, 501 Fifth Avenue, New York, New York, 10017-6107, telephone, (212) 922-2129, (212) 661-7952. The limited payments for administrative expenses for the purposes of operating a committee have been fully disclosed on Schedule(s) B-supporting Line(s) 21(b) of the Detailed Summary Page for the period referenced above. **I direct your attention to this schedule.**

In particular, while the Committee has no lease at any office or utility accounts, payments reflecting rent, utilities, salaries, telephone service, office equipment and supplies are reflected in the payments made on Schedule (s) B to Andrew R. Tulloch, Esq., which is for both salary/legal fee and office reimbursement expenses, and to Bell

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Atlantic and Con Edison for the Committee's pro-rata expenses for its share of fundraising expenses associated with another unconnected committee's location.

The expenses of the Committee are not paid for by a connected organization and as such the Committee's Statement of Organization does not need to be amended pursuant to 2 U.S.C 433(b)(2). Additionally, there are no goods or services other than those listed on Schedule(s) B by a person, except volunteer activity which 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 provisions and prohibitions of 2 U.S.C. 441a and 441 b.

The preceding paragraphs of this response should provide the Commission's required clarification regarding administrative expenses during the current two year elections cycle. All expenses referenced in the first paragraph of your letter and the preceding letter of Scott Walker, the Reports Analyst, dated May 17, 2000 for this period are fully disclosed and any other services are volunteer activities, and no services are provided by any other committee. The Committee operates on a pay as you go for its expenses and has made payments which have been fully disclosed on Schedule(s) B.

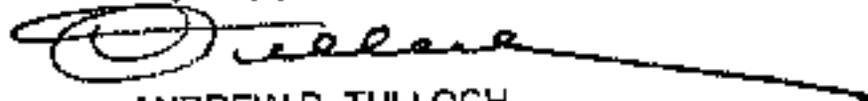
The Committee will also follow your recommendation and only contributions to federal candidates and political committees should be itemized on a separate Schedule B supporting Line 23 of the Detailed Summary Page. Contributions to non-federal candidates and committees will be itemized on Schedule B supporting Line 29. The first report period following this letter is the next quarterly report for the period 4/1/00-6/30/00 and the Committee will be guided accordingly.

If you have any questions do not hesitate to call me at my law office, (212)922-2129 or send by facsimile to me at my law office, (212) 661-7952, which is the operating location of the Committee. The Statement of Organization as filed shall remain. Correspondence is forwarded to my office by the Treasurer when received at the mailing location.

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The Committee apologizes for the delay in responding to the Commission's RQ-2. My conversation with Mr. Walker indicated that he wanted this RQ-2 responded to jointly with the RQ-2 dated May 17, 2000 for the period 1/1/99-6/30/99, and the delay is attributed to providing information to the issues on the unincorporated proprietorships listed on schedule A using our best efforts to do so.

Very truly yours,

A handwritten signature in black ink, appearing to read "Andrew R. Tulloch", written over a horizontal line.

ANDREW R. TULLOCH

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.

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