

KIRKLAND & ELLIS
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATION

FEB 25 9 37 AM '94

200 East Randolph Drive
Chicago, Illinois 60601

312 861-2000

To Call Writer Direct
312 861-2142

Facsimile:
312 861-2200

February 23, 1994

Mr. J. P. Andre'
Reports Analyst
Reports Analysis Division
Federal Election Commission
Washington, D.C. 20463

Re: Identification Number: C00212142
Mid-Year Report (1/1/93-6/30/93)

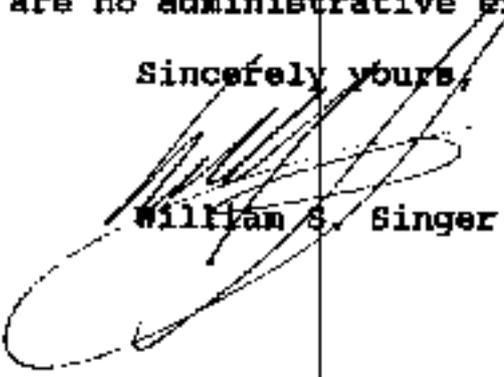
Dear Mr. Andre':

This letter is in response to your letter dated February 9, 1994 (copy attached) which was generated by the above referenced PAC's Mid-Year Report.

In response to your request regarding administrative expenses, please be advised that the Committee has made no payments for any of the items set forth in your definition of administrative expenses. Furthermore, we have no administrative expenses of any kind since all the work of the Committee is handled by me on a volunteer basis. I keep the check book, the records and sign all checks. My secretary, from time to time, assists me as a volunteer in the keeping of records and preparation of reports.

I trust this sufficiently responds to your request for clarification why there are no administrative expenses.

Sincerely yours,


William S. Singer

WSS:jb
Enclosure

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

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FEB 9 1994

William S. Singer, Treasurer
Kirkland and Ellis Political
Action Committee (FKA WSS PAC)
200 East Randolph Dr., 59th Floor
Chicago, IL 60601

Identification Number: C00212142

Reference: Mid-Year Report (1/1/93-6/30/93)

Dear Mr. Singer:

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 B, supporting Line 21 of the Detailed Summary Page. (2 U.S.C. §434(b)(5)) 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 (60) days or more. 11 CFR §104.11

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)

PLEASE NOTE: Should your committee have a non-federal account(s), these administrative expenses MUST be disclosed on Lines 18, 21(a)(i) and 21(a)(ii) of the Detailed Summary Page and Schedules H2, H3 and H4 (and possibly Schedule H1 if it has not previously been filed). (See 11 CFR §106.6(b)(2)(i).

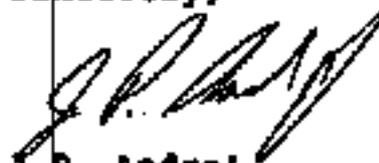
Any goods or services provided to your committee by a person, except volunteer activity (i.e., a person's time), would be considered an in-kind contribution from that person, and would be subject to the disclosure requirements of 2 U.S.C. §434(b)(3) and 11 CFR §104.13, and the limitations and prohibitions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

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Please provide clarification regarding administrative expenses incurred by your committee and/or amend your report to disclose such expenses according to the referenced provisions of the Act and Commission Regulations. Clarification regarding administrative expenses should be disclosed during each two year election cycle beginning with the first report filed in the non-election year.

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) 219-3580.

Sincerely,



J.P. Andre
Reports Analyst
Reports Analysis Division

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**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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JMN
 PREPARER

2-25-94
 DATE PREPARED

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