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September 11, 2002

BY FEDERAL EXPRESS

Ms. Angel L. Williamson
Senior Reports Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

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**Re: Clarification of Amended March Monthly Report (2/1/02 – 2/28/02)
(I.D. Number C00282921)**

Dear Ms. Williamson:

This letter responds to your RQ-5 letter dated August 9, 2002, which raised questions concerning the disclosure of limited payments for administrative expenses contained in the Winston & Strawn Political Action Committee ("Winston & Strawn PAC") (Identification Number: C00282921) Amended March Monthly Report.

In your letter, you stated that payments made for administrative expenses must be disclosed on Schedule B supporting Line 21(b) of the Detailed Summary Page. Each month the Winston & Strawn PAC reimburses the connected organization for administrative expenses including office space, utilities, telephone use, computer use, miscellaneous charges, and salaries for administrative personnel. This reimbursement is for a combined total of \$351.14 per month and is consistently reported on Line 21(b) on Winston & Strawn's PAC monthly reports, including the Amended March Monthly Report. Due to space constraints in the memorandum portion of the report, the reimbursements are listed as "administrative expenses" or "Bank Charges—Administrative expense for rent" rather than using a more complete notation. We apologize for any misunderstanding this may have caused, and we will work with our software vendor to provide a more detailed notation.

The Winston & Strawn PAC does not have a dedicated full-time administrative staff. Instead, administrative tasks are completed by secretarial staff of the connected organization. This staff member's salary is pro-rated to account for the amount of time spent on Winston &

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Strawn PAC matters. This calculation is included in the reimbursement paid by the Winston & Strawn PAC to the connected organization.

I hope this information addresses responsively the questions raised in your letter. If you require additional information or have further questions, please do not hesitate to contact me at (202) 371-5855.

Sincerely,



Wesley D. Bizzell, Esq.

