



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Charles E. Woodhouse, Treasurer
Gibson Dunn & Crutcher LLP PAC
333 South Grand Avenue
Los Angeles, CA 90071

JAN 12 2000

Identification Number: C00344754

Reference: Mid-Year Report (1/1/99-6/30/99)

Dear Mr. Woodhouse:

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 non-multicandidate political committee and its affiliates, from making a contribution to a candidate for federal office in excess of \$1,000 per election. Please refer to the Campaign Guide for information on how a committee qualifies for multicandidate status.

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 \$1,000 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,



Lucy J. Denny
Reports Analyst
Reports Analysis Division

SCHEDULE B**ITEMIZED DISBURSEMENTS**Use separate schedule(s)
for each category of the
Detailed Summary Page

19 / 19

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)
GIBSON DUNN & CRUTCHER LLP PAC

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|--|---|---------------------------------------|--|
| Full Name, Mailing Address, and ZIP Code FRIENDS OF GIULIANI EXPLORATORY COMMITTEE 250 BROADWAY SUITE 2104 NEW YORK NY 10007 | Purpose of Disbursement (Senate - NY - 00) Friends of Giuliani/Senate | Date (month, day, year) 05/10/1999 | Amount of Each Disbursement This Period 2000.00 |
| | Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): | | |
| Full Name, Mailing Address, and ZIP Code LIEBERMAN 2000 COMMITTEE P O BOX 231284 STATE HOUSE SQUARE HARTFORD CT 06123 | Purpose of Disbursement (Senate - CT - 00) Lieberman 2000 | Date (month, day, year) 05/10/1999 | Amount of Each Disbursement This Period 500.00 |
| | Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify): | | |
| Full Name, Mailing Address, and ZIP Code BERMAN FOR CONGRESS 8665 WHILSHIRE B1 SUITE 220 BEVERLY HILLS CA 90211 | Purpose of Disbursement (House - CA - 25) | Date (month, day, year) 08/09/1999 | Amount of Each Disbursement This Period 500.00 |
| | Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify): | | |

SUBTOTALS of Disbursements This Page (Optional)

TOTALS This Period (last page this line number only)

3000.00

