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December 3, 2004

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Adam Ragan
Assistant Branch Chief
Reports Analysis Division
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: Stephen Adams
Identification Number C90008657
October Quarterly Report

Dear Mr. Ragan:

This letter is in response to your November 12, 2004 request for additional employer and/or occupation information for Item #2. As you know, Commission regulations require a Form 5 filer to identify his occupation and "the name of his or her employer, if any." 11 C.F.R. § 109.10(e)(1)(i)(emphasis added). Mr. Adams is a self-employed investor with ownership interests in a number of different businesses in a number of different industries. Mr. Adams is not involved in the day-to-day operations of these businesses, so it would not be appropriate to identify any individual business as his employer. Accordingly, the correct response to Item #2 is to describe Mr. Adams as a self-employed investor.

I hope that this letter resolves the question raised by your November 12, 2004 letter. If you have any further questions, please do not hesitate to contact me at the address above.

Sincerely,

Brett Kappel

Brett G. Kappel
Counsel for Stephen Adams

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Federal Election Commission

ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS

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JSell
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