

September 3, 2007

Christopher J. Morse  
Senior Campaign Finance Analyst  
Reports Analysis Division  
Federal Election Commission  
Washington, D.C. 20463

Re: Holland & Knight Committee for Effective Government PAC  
FEC ID C00171330

Dear Mr. Morse

This letter is submitted in response to your Request for Additional Information dated August 3, 2007 regarding administrative expenses for the Holland & Knight Committee for Effective Government PAC ("H&KCEG PAC"). In order to prepare this response, Holland & Knight LLP conducted an internal review of the H&KCEG PAC and any related expenses.

Based on this review, we believe that all H&KCEG PAC administrative costs have been accurately reported in our 2007 Mid Year Report. As you are aware, H&KCEG PAC reports expenses related to the use of the Holland & Knight LLP payroll system, payments to an outside vendor for PAC accounting and Federal Election Commission filing software, and legal and accounting services necessary to comply with the Federal Election Campaign Act (FECA) provided by firm employees.

H&KCEG PAC does not have any office space, utility expenses, or employees. PAC checks, PAC letterhead, and any postage are paid for out of H&KCEG PAC funds. Any use of office equipment is incidental to the operation of the law practice. Any increase in overhead or operating costs to the firm caused by H&KCEG PAC is reimbursed by H&KCEG PAC. Any services provided to H&KCEG PAC by firm employees has been either legal or accounting services necessary to comply with FECA or performed on a volunteer basis.

However, as a result of our review and out of an abundance of caution, H&KCEG PAC has decided to begin making and reporting expenditures to Holland & Knight LLP to reimburse for any firm employee time related to H&KCEG PAC that could be considered an in-kind contribution to H&KCEG PAC (i.e. employee time that is not legal or accounting services necessary to comply with FECA or provided on a volunteer basis). We will begin paying for these expenses effective September 1, 2007 and this will be reflected on our Year End 2007 report.

As treasurer for H&KCEG PAC, I have used my best efforts to obtain, maintain, and submit the information required by FECA. If there is any additional information you require or you would like to discuss this matter further, please do not hesitate to contact me at (202) 457-7143.

Sincerely,  
Richard M. Gold  
Treasurer

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