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January 13, 1998

Ms. Melissa Hurd
Federal Election Commission
999 E. Street, N.W.
Washington, DC 20463

Re: Health Care Leadership Committee

Dear Ms. Hurd:

Thank you for your assistance during our telephone call on Tuesday, January 6, 1998. As I indicated, we serve as counsel to the Health Care Leadership Committee ("HCLC"), and this letter responds to yours dated December 10, 1997, addressed to John Sharamitaro, Treasurer of the HCLC.

As we discussed, the HCLC is a Missouri not-for-profit corporation that has organized both a federal and a non-federal (state) committee with separate accounts. Neither committee solicits nor accepts contributions from corporations, labor unions or foreign entities or individuals. Generally speaking, many of the same individuals contribute to the federal and state committees of the HCLC.

Unfortunately, in one instance, funds that were collected for the federal committee were inadvertently deposited into the state committee account. This oversight necessitated a transfer of such funds (\$4,500.00) from the state to the federal committee account. This transfer was reported on the HCLC's amended mid-year report (1/1/97 - 6/30/97) dated October 10, 1997, and gave rise to your correspondence.

You indicated during our conversation that if this situation was adequately explained to the Federal Election Commission, no further action would be required and the

BRYAN CAVE LLP

Ms. Melissa Hurd
January 13, 1998
Page 2

HCLC would not be considered in violation of governing laws. I trust this letter is sufficient for that purpose. If you require anything further, please advise and we will proceed accordingly.

Thank you for your assistance in this matter.

Yours truly,


Jonathan F. Dalton

JFD/lmm

Federal Election Commission

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