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SKADDEN ARPS POLITICAL ACTION COMMITTEE APR -1 P 3 13  
1440 New York Avenue, N.W.  
Washington, D.C. 20005

Telephone: 202-371-7144  
Facsimile: 202-371-7938

March 22, 2002

Mr. Jim Krebs  
Reports Analyst  
Federal Election Commission  
Washington, D.C. 20463

Dear Mr. Krebs:

I am responding to your March 13 request for information on the reporting of administrative expenses by the Skadden Arps Political Action Committee.

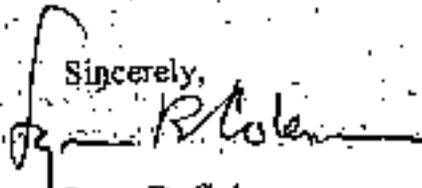
First, Skadden Arps PAC is separate and distinct from Skadden, Arps, Slate, Meagher, and Flom LLP. In the statement of organization, the Skadden Arps PAC declared itself a non-connected committee contributing to federal candidates only.

Second, the Skadden Arps PAC periodically and fully discloses administrative fees in its scheduled reports to the FEC. In fact, in the reporting period identified in your letter, the Skadden Arps PAC disclosed \$800.00 in administrative expenses. These expenses include the kind of overhead items mentioned in your letter. Additionally, the PAC reported \$8,445.00 in exempt legal and accounting expenses related to compliance activities during the covered reporting period.

Finally, no expenses were incurred but not paid during the reporting period, nor any in-kind contributions, nor disbursement of administrative fees by the PAC to itself. Your request to clarify administrative expenses during each two year election cycle does not apply to the Skadden Arps PAC because the PAC is solely a federal PAC and does not allocate expenses between federal and non-federal activity.

I hope this is helpful and responsive to your inquiry.

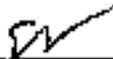
Sincerely,

  
Lynn R. Coleman  
Treasurer

Federal Election Commission

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