

JAN 19 4 07 PM '00

**HOLLAND & KNIGHT COMMITTEE
FOR EFFECTIVE GOVERNMENT**

(FEC I.D. C00171330, Multicandidate-Qualified)

2100 Pennsylvania Avenue NW, Suite 400

Washington, D.C. 20037-3202

Telephone (202) 955-3000

January 19, 2000

Mr. Kenneth A. Davis, Jr., Reports Analyst
Reports Analysis Division
Federal Election Commission
999 E Street NW
Washington, D.C. 20463
Tel. (202) 694-1130

Dear Mr. Davis:

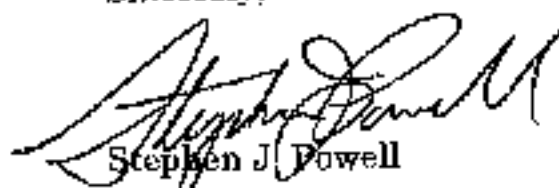
Regarding the letter received by this office on January 10, 2000, please find the following clarifications:

Administrative expenses of the Holland & Knight Committee for Effective Government such as office space and other costs are incidental to the operation of the law practice. The firm's political action committee is relatively small and does not result in additional expenses such as office space, telephone service, utilities, office equipment, etc. Further, no expenses of the Holland & Knight Committee for Effective Government are being paid by a "connected organization."

The political action committee ("PAC") does not have its own stationery. The PAC does not have any employees. Those employees working on PAC activities do not enjoy any additional compensation for the incidental work the PAC requires. There is no office space set aside for PAC activities. There are not postage expenses and no mass mailings. Solicitation is generally done in person at the annual meeting of the partners. Accordingly, all expenses are incidental to the operation of the law practice.

Please call me if I may provide you with any further information.

Sincerely,


Stephen J. Powell
Treasurer



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

JAN 5 2000

Stephen J. Powell, Treasurer
Holland & Knight Committee
For Effective Government
2100 Pennsylvania Avenue NW #400
Washington, DC 20037

Identification Number: C00171330

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

Dear Mr. Powell:

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:

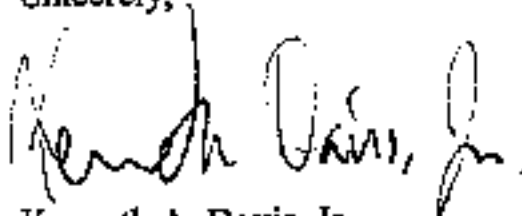
-Your report discloses no payments for administrative expenses. Administrative expenses are payments made for the purpose of operating a political committee including, but not limited to, rent, utilities, salaries, telephone service, office equipment and supplies. Any such payments to a person aggregating 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,

A handwritten signature in black ink, appearing to read "Kenneth A. Davis, Jr.", written in a cursive style.

Kenneth A. Davis, Jr.
Reports Analyst
Reports Analysis Division

