

ETEXT ATTACHMENT

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02/22/2002 14 : 21

January 29, 2002

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

Dear Mr. Walker:

Regarding the letter received by this office on December 19, 2001, 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 ("PAC") 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 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. The PAC does not have postage expenses nor does it conduct 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.

In fact, a key reason administrative costs for the PAC have been kept to a minimum is because the PAC currently leases Aristotle Publishing's PAC software package. This software is a PAC management system that automates a wide range of PAC functions, including the preparation and electronic filing of federal compliance reports with the FEC. As you will see on the attached Schedule B from the Mid-Year 2001 FEC Report, \$5,616.25 was paid to Aristotle Publishing and reported as an operating expenditure for the PAC.

Please call me at (617) 305-2044 if I may provide you with any further information.

UUUUUUU Sincerely,

UUUUUUU Cheryl Cronin
UUUUUUU Treasurer

WAS1 #1051086 v1
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