

# LEHMAN BROTHERS

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January 15, 2002

Ms. Alice Kang  
Reports Analyst  
Report Analysis Division  
Federal Election Commission  
Washington, D.C. 20463

Your Identification Number: C00127670  
Your Reference: April Monthly Report (3/1/01-3/31/01)

Dear Ms. Kang:

I am writing in response to your requests for additional information dated December 5, 2001 and December 27, 2001. I apologize for the delay in this response, as I did not receive your original letter.

The Action Fund of Lehman Brothers Holdings Inc. (the "Action Fund") has been in contact with the National Republican Senate Committee ("NRSC"), and has requested a refund of \$5,000. We have been advised that this request is currently being processed by the NRSC. The refund represents the amount by which the aggregate 2001 contributions of the Action Fund and the Peabody Political Action Committee inadvertently exceeded the \$15,000 limit. When the refund is received, we will submit a copy of the refund to you, and disclose the refund on the report covering the date of the receipt of the check.

The Action Fund makes every effort to follow the applicable regulations governing the financing of federal elections and has procedures in place to monitor contributions against the applicable limits, including procedures for aggregating contributions by its affiliates. The Action Fund will enhance these procedures in order to prevent future inadvertent errors of this type.

Please feel free to contact me at (212) 526-0588 if you require any further information.

Sincerely,



Edward S. Grieb  
Treasurer  
Action Fund of Lehman Brothers Holdings Inc.

cc: John D. Gibson - FEC  
Jeffrey Welikson - Lehman Brothers

Federal Election Commission

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