

## ETEXT ATTACHMENT

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March 19, 2002

Federal Election Commission  
Reports Analysis Division  
999 E Street, NW  
Washington, DC 20463  
Attn: Mr. John Gibson

Identification Number: --C00307405

Reference: LAmmended 12 Day Pre-Special Report (1/1/01-4/25/01), received 7/18/01

Dear Mr. Gibson:

This letter is in response to your request for additional information dated February 28, 2002 and received by the Keep Our Majority PAC on March 5, 2002.

PI have again reviewed 11 CFR § 104.3(b)(3) regarding acceptable purposes of disbursements. There is no indication that "Accounting Fee/Expenses" is an unacceptable description. However, after reviewing these specific expenditures, I have determined that these expenditures were for Accounting Services. An amendment has been filed and the Committee will be aware of your definition of "concise and specific reporting" on future reports.

LI have again reviewed the regulation cited in your original request for additional documentation, dated February 6, 2002. 11 CFR § 102.2(b)(ii) is a record keeping requirement only. In this current request for additional information, you cited 11 CFR § 104.9(b), which states that "when an expenditure made to a recipient in a reporting period is added to previously unitemized expenditures to the same recipient and the total exceeds \$200 for the calendar year... the reporting political committee shall disclose the recipient's full name and address on the prescribed reporting forms...". In this case, the credit card vendor was the recipient and this vendor's full name and address has been disclosed. Again, Commission regulations do not specifically require committees to report ultimate vendor detail for disbursements for credit card payments. However, in the interest of full disclosure, KOMPAC does itemize the ultimate vendor information, as memo entries. These memo entries now include a full address, as provided by the vendor, and an amendment has been filed.

LSould you have any further questions, please feel free to contact me at 703-549-7705.

Sincerely,

Lisa R. Lisker  
Assistant Treasurer