



**ERNST & YOUNG  
POLITICAL ACTION COMMITTEE**

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2002 JAN 25 A 11:42

January 24, 2001

Mr. Scott Walker  
Reports Analyst  
Reports Analysis Division  
Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

Reference: 2001 FEC February Monthly Report and the Amended April  
Monthly Report

Identification Number: C00227744

Dear Mr. Walker:

In response to your letters dated January 9, 2001 and January 11, 2001, respectively,  
regarding payments for Administrative expenses. (See attached)

The Ernst & Young PAC, a non-connected political action committee, reimburses the  
firms, Ernst & Young LLP, for administrative expenses which include rent, utilities,  
salaries, telephone, courier services and supplies. For the months of January through  
April in the year 2001, these expenses were reimbursed in 3 separate payments per  
month; one for rent, utilities and telephone; a second for salary and a third for courier  
services and supplies. However, in the month of May 2001, we combined these  
payments into one totaling \$2,000 to cover all administrative expenses. This payment is  
made at the beginning of the month to cover that month's administrative expenses.

Thank you for your attention to this matter. If you have any additional concerns, please  
do not hesitate to contact me at 202-327-7584.

Sincerely,

Allen Urban  
Treasurer  
Ernst & Young Political Action Committee

Enclosures

PAC Director  
K.C. Tomlinovich  
1225 Connecticut Ave., NW  
Washington, DC 20036  
(202) 327-6410  
(202) 327-8863 - fax



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-5

Allen W. Urban, Treasurer  
Ernst & Young Political Action Committee  
1225 Connecticut Avenue, NW, Suite 800  
Washington, DC 20036

JAN 11 2002

Identification Number: CD0227744

Reference: February Monthly Report (1/1/01-1/31/01)

Dear Mr. Urban:

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(s) 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.

Any amendment or clarification should be filed with the Federal Election Commission. Electronic filers must file amendments in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

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Sincerely,



Scott Walker  
Reports Analyst  
Report Analysis Division



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20462

RQ-2

JAN 9 2002

Allen W. Urban, Treasurer  
Ernst & Young Political Action Committee  
1225 Connecticut Avenue, NW, Suite 800  
Washington, DC 20036

Identification Number: C00227744

Reference: Amended April Monthly Report (3/1/01-3/31/01), received 5/16/01

Dear Mr. Urban:

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(s) B supporting Line 21(b) of the Detailed Summary Page. 2 U.S.C. §434(b)(3) 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(h)(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 response or 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. Electronic filers must file amendments in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9590 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Scott Walker  
Reports Analyst  
Report Analysis Division

Federal Election Commission

**ENVELOPE REPLACEMENT PAGE  
FOR INCOMING DOCUMENTS**

The Commission has added this page to the end of this filing to indicate how it was received.

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