Midnight Sun PAC

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February 22, 2000

Federal Election Commission
Reports Analysis Division
Attn: Debbie A. Chacona
999 E Street, NW
Washington, DC 20463

Identification Number: C00345199

RE: August Monthly Report (7/1/99 – 7/31/99)

Dear Ms. Chacona:

This letter is in response to the FEC notice dated February 9, 2000 which questions disclosure of payments for administrative costs for Midnight Sun Political Action Committee.

Midnight Sun PAC pays no salaries, only consulting fees, legal fees, and expenditures for consultants traveling on behalf of the committee. In addition, the PAC rents no office space, its business is conducted out of several offices, with costs covered by said consulting and legal fees.

In addition we have amended the report to reflect the correct year-to-date total for James Stanton. We apologize for any inconvenience this may have caused. Feel free to call me at if you have any questions.

Sincerely,

Jack Ferguson
Treasurer