

Supplement to

AOR 2003-14



DKappel@PGFM.com on 05/06/2003 06:14:39 PM

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To: rewell@fec.gov
cc:

Subject: RE: Request for additional information re: AOR 2003-14 (Home Depot)

I spoke to The Home Depot and here are the answers to your questions:

1. What is the approximate cost or value of one of the proposed PAC pins?

The approximate cost of the proposed PAC apron pins will be less than 50 cents per pin.

2. How often will PAC contributors receive a pin? With each separate contribution? Do you anticipate that some individuals could acquire and display more than one of the PAC pins?

New PAC contributors will receive a pin when they make their first PAC contribution. Existing contributors will receive a pin when they make their next contribution. No contributor will receive more than one pin.

3. You state that members of the restricted class will receive these pins after making a contribution to the Home Depot PAC. Will these pins be distributed to any other employees or other individuals? If so, under what circumstances?

The pins will only be distributed to members of the restricted class after making a contribution to the Home Depot PAC.

4. You describe the PAC pins as "apron pins" and state that the exposure of the pins to persons outside the restricted class will be limited in light of the fact that only a small percentage of the restricted class wear aprons more than four times per year. Should the Commission assume for the purposes of this request that the apron pins cannot or will not be worn without an apron (i.e., as a lapel pin)?

The Home Depot believes that it is extremely unlikely that any recipient of the apron pin would wear the pin in any way other than on their shop apron. Given The Home Depot's long tradition of issuing apron pins for a wide variety of purposes, Home Depot employees will naturally assume that the pin is for their apron and those that choose to participate in this corporate custom will attach the pin to their shop apron.

5. For additional context regarding the size of the PAC pin in relation to other Home Depot apron pins, please provide the dimensions of some other representative Home Depot apron pins.

Home Depot apron pins vary between 1 and 2 inches in height or length, depending on the orientation of the matter depicted by the pin. The Home Depot PAC pin would be approximately 1 and 1/2 inches in height - the average for all Home Depot pins. The Home Depot PAC pin will not, therefore, stand out in a cluster of Home Depot pins because of its size.

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