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*Supplement
 to AOR 2000-28*

FACSIMILE - Monday, November 20, 2000

TO:

**N. Bradley, Litchfield,
 Esquire**

F.E.C.

NAME

COMPANY/FIRM

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FROM:

Cheryl Cronin

617-305-2044

NAME

TELEPHONE NUMBER

Jo Mayhew, Secretary

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TOTAL NUMBER OF PAGES (Including Cover Sheet) =2=

MESSAGE:

Mr. Litchfield, A copy of my letter to M. Marinelli follows.

Cheryl Cronin

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November 6, 2000

VIA ELECTRONIC and U.S. MAIL

Mr. Michael Marinelli
Federal Election Commission
999 E Street, N.W., Room 709
Washington, DC 20463

Re: Advisory Opinion Request 2000-28

Dear Mr. Marinelli:

This letter shall serve as a response to your recent letter and to the subsequent telephone discussions we have had related to this matter. We offer the following additional information relevant to our advisory opinion request:

1. At the outset, I note that there will be no formal relationship between ASHA and NMHC. Indeed, as evidenced by the documents previously sent to you, these organizations have taken all necessary and significant steps to ensure they are not related or connected in any way. Rather, they will function as many trade organizations do who co-exist in a particular area of industry or business. They will have separate agendas developed by separate staff and boards of authority. It is likely that some corporations or other entities will determine it is in their interest to belong to both ASHA and NMHC, as well as other trade organizations which might advance some similar or related agenda. Indeed, most corporations do belong to more than one trade association or organization.¹

¹ We understand such corporations are, nevertheless, prohibited from giving more than one trade association the right to solicit their restricted class. But that prohibition actually contemplates that corporations are likely to belong to more than one trade association].

Michael Marinelli
Federal Election Commission
November 6, 2000
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In response to your specific questions:

1. Approximately 75% of ASHA's members are corporations. Subsequent to its separation from NMHC, ASHA will be a trade association.

2. We anticipate that approximately 14% of ASHA's membership, or 35 companies, may also be members of NMHC. Since NMHC has a membership of approximately 750 companies, that overlap represents less than 5% of the NMHC membership.

3. Of the 50 board members of ASHA, it is possible that approximately 10-12 of them will be involved to some degree in NMHC. However, that dual involvement will actually be in the form of participation by different individuals within an organization. In other words, the same individual who serves on the ASHA board will likely not be the individual involved with NMHC.

4. Subsequent to December 31, no officer or staff of ASHA will have continuing ties to NMHC nor will hold any position with NMHC.

Please contact me should you need any additional information.

Very truly yours,
HOLLAND & KNIGHT, LLP

/s/ Cheryl M. Cronin

Cheryl M. Cronin

CMC/jam

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