

# HOGAN & HARTSON LLP

ROBERT J. KENNEY, JR.  
PARTNER  
(202) 637-5707  
RJKENNEY@HHLAW.COM

November 30, 2000

COLUMBIA SQUARE  
555 THIRTEENTH STREET, NW  
WASHINGTON, DC 20004-1109  
TEL (202) 637-5600  
FAX (202) 637-5910

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Federal Election Commission  
Office of General Counsel  
Attn: Jonathan Levin  
999 E Street, N.W.  
Washington, D.C. 20463

*Supplement to  
AOR 2000-36*

**Re: Supplemental Information Regarding Request for an  
Advisory Opinion on the Disaffiliation of Andersen  
Consulting PAC**

Dear Mr. Levin:

By letter dated October 26, 2000, Andersen Consulting PAC ("AC PAC") (FEC identification no. C00300707), an independent multi-candidate committee, sought an advisory opinion that it is not affiliated, within the meaning of 11 C.F.R. § 100.5(g), with Arthur Andersen PAC ("AA PAC"). This letter corrects and supplements certain information provided in that October 26 letter.

On the question of overlap of PAC officers between the AC PAC and the AA PAC since 1995, the following individuals have been identified as serving in roles for both the AC PAC and AA PAC for the dates indicated: (1) Jeffrey Peck served as Treasurer of both the AA PAC and the AC PAC from January 1995 until January 1999; (2) Sharon Simpson served as Assistant Treasurer of the AA PAC and the AC PAC from January 1995 until November 1995; and (3) Carol Hamburger served as Assistant Treasurer of the AA PAC and the AC PAC from November 1995 until January 1999. In addition, we are informed that Jon Ekdahl, who served as a Board member of the AC PAC from January 1995 until January 1999, likely served on the AA PAC Board as well for all or part of this period. 1/

We would note that Andersen Consulting considers these individuals to have

1/ We are unable to confirm Mr. Ekdahl's role in the AA PAC with certainty because Andersen Consulting does not have access to the AA PAC's internal documentation.

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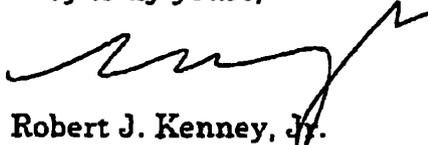
We would note that Andersen Consulting considers these individuals to have been functioning for the AC PAC during the period of overlap as representatives of the Andersen Worldwide Société Cooperative ("AW"), serving as part of the "AW Services" group that provided services to and on behalf of both Business Units, and not as representatives of Arthur Andersen LLP, even though some or all of them were partners or employees of Arthur Andersen LLP. There have been no overlapping PAC personnel since January 1999.

On the question of common contributors, we are informed that 15 AW Services partners have been identified as having made aggregated contributions of over \$200 2/ to both the AA PAC and the AC PAC during the years 1995 to 1997. (We understand that during this time period some PAC solicitations gave the small group of AW Services partners -- because of their unique position supporting both business units -- the opportunity to contribute to both PACs.) These joint contributions had ceased by 1997, in part because of the division that had occurred between the partnerships by that time, as discussed in our telephone conversation on Monday afternoon.

On the question of fund transfers between the two PACs, we are informed that the two 1995 transfers you identified are the only transfers that appear in Andersen Consulting PAC's records.

As we have discussed, my partner Mr. Keeney is out of the country until next week, and has therefore been unable to participate in our discussions of the last several days or in the preparation of this letter. In Mr. Keeney's absence, please contact me directly with any further questions or concerns, and I will do my best to respond.

Very truly yours,



Robert J. Kenney, Jr.  
Attorney for Andersen Consulting PAC

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2/ Contributions by AW partners of less than \$200, if any, have not been included in this disclosure because such contributions are not publicly available. See 11 C.F.R. § 104.3(a)(4)(i).