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2002 OCT -7 A 11: 59

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October 7, 2002

Jan Witold Baran
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Commission Secretary
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: Draft Advisory Opinion 2002-11

Dear Madam Secretary:

I am in receipt of draft Advisory Opinion 2002-11. The draft states at page 4, lines 8-10 that "[s]tate mortgage bankers associations do not qualify as regular or associate members, but are eligible for 'membership' in MBAA pursuant to Article X of the Bylaws, as 'Adjunct Organizations.'" Our client informs us that this is an overstatement of the role of the state associations. Rather than being eligible for "membership," state associations are eligible to "participate" in the Mortgage Bankers Association as Adjunct Organizations. I respectfully request that the final draft of the Advisory Opinion reflect this change.

Thank you for your attention to this matter.

Sincerely,

Jan Witold Baran
Carol A. Laham

cc: Lawrence Norton, Esq.