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MCDERMOTT, WILL & EMERY

September 3, 1999

Michael Marinelli, Esq.
Office of General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Supplement to
AOR 1999-20

Re: Advisory Opinion Request – EQUIPAC

SEP 7 3 56 PM '99

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FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

Dear Mr. Marinelli:

This is in response to your request for additional information in connection with the advisory opinion request submitted on June 11, 1999 on behalf of the Equitable Companies, Inc. Political Action Committee ("EQUIPAC"). Our response to the to three questions you posed follow below:

1. EQUIPAC is seeking guidance with respect to solicitations to the restricted class and also under the twice- yearly solicitation rules.
2. Equitable does not voluntarily withhold Federal income tax from any of the insurance agents who are the subject of the AOR.
3. When the term "statutory employees" is used in the context of these agents, it denotes individuals for whom the Internal Revenue Code requires the withholding of FICA taxes, but not Federal income taxes.

Finally, on behalf of Equitable, I am pleased to provide the Commission with an extension through October 20, 1999 of the time to consider this AOR.

Michael Marinelli, Esq.
September 3, 1999
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I hope this information is responsive to your request, and will provide a complete file upon which the AOR can be presented to the Commission. Please do not hesitate to contact me if you need any additional information.

Sincerely

A handwritten signature in black ink, appearing to read "Evan M. Migdal", is written over a horizontal line. The signature is stylized and somewhat cursive.

Evan M. Migdal