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March 15, 2001

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OFFICE OF THE SECRETARY

MAR 16 2001

VIA FACSIMILE AND MAIL

Jonathan Katz, Secretary
Securities and Exchange Commission
450 Fifth Street, N.W.
Mail Stop 6-9
Washington, DC 20549

Re: Statement by Stephanie Avakian Pursuant to Rule 8(b) of the Commission's
Conduct Regulation (b)(7)(A)

Dear Jack:

This statement is filed pursuant to Rule 8-3 of the Commission's Conduct Regulations, 17 C.F.R. § 200.735-8(b), which requires that a former employee of the Commission, for two years after ceasing to be a Commission employee, file a statement with the Commission's Secretary if employed or retained as the representative of any person in any matter where it is contemplated that the former employee will appear before the Commission or communicate with the Commission or its employees. The statement must be filed within ten days of the former employee's retainer or employment or of the time when appearance before, or communication with, the Commission is first contemplated.

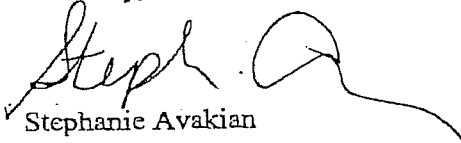
I formerly was counsel to Commissioner Paul R. Carey and resigned effective November 19, 1999 to accept employment with the law firm of Wilmer, Cutler & Pickering. This is to advise you that we have been retained to represent (b)(7)(C) in connection with a Securities and Exchange Commission investigation. In the course of my representation, it is contemplated that I will appear before, or communicate with, the Commission or the staff of various offices of the Commission by telephone, correspondence, or otherwise.

While an employee of the Commission, to the best of my knowledge, I did not have official responsibility for, nor did I participate personally or substantially in the review of any issue related to or arising out of the current matter.

Jonathan Katz, Secretary
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Because my participation in this matter may continue for an indefinite period involving more than one communication with or appearance before the Commission or its staff, this statement, pursuant to Rule 8-3b of the Commission's Conduct Regulation, 17 C.F.R. §200.735-8(b)(2), is intended to cover all my appearances and communications which relate directly to the Company.

Sincerely,


Stephanie Avakian

cc: Commissioner Paul R. Carey
(b)(7)(C)