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U.S. HOUSE OF REPRESENTATIVES

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December 20, 2016

Office of the Clerk
U.S. House of Representatives
Legislative Resource Center
135 Cannon House Office Building
Washington, DC 20515

Re: Congressman-Elect Paul Mitchell Personal Financial Disclosure Statement

Dear Sir or Madam:

We are in receipt of a letter dated November 22, 2016 from the U.S. House of Representatives Committee on Ethics ("Committee") requesting additional information related to Congressman-Elect Paul Mitchell's Public Financial Disclosure Statement ("Statement"). Specifically, you have asked for information regarding the Huron Fund III LP ("Huron Fund") and its underlying assets.

It is our understanding that the Huron Fund meets the criteria of an Excepted Investment Fund ("EIF"). A fund is considered an EIF if it meets the following criteria: (1) The asset is a fund; (2) the fund has 100 or more investors; (3) the filer does not exercise control over or have the ability to exercise control over the financial interests held by the fund; and (4) the fund is publicly traded or the assets of the fund are widely diversified.

The Huron Fund is a fund comprised by over 100 investors. As a Limited Partner, Congressman-Elect Mitchell exercises no control over the Huron Fund and has no ability to exercise control over the financial interests held by the Huron Fund. Moreover, Congressman-Elect Mitchell, as with other Limited Partners, does not receive any information from the Huron Fund regarding the valuation or financing of underlying assets held by the Fund. Finally, it is our understanding that the assets of the Huron Fund are widely diversified among different economic sectors and geographic regions.

Congressman-Elect Mitchell has many investments and holdings that he has detailed and thoroughly disclosed on his Statement. The Huron Fund is a passive and relatively small investment by Congressman-Elect Mitchell.

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We believe we have provided sufficient information to the Committee regarding this investment and all other assets. If the Committee has any further questions regarding this or other aspects of Congressman-Elect Mitchell's Disclosure Statement please contact me at 202-572-8669.

Sincerely,

Elizabeth Beacham White

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