

November 21, 2006

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VIA FACSIMILE AND FIRST CLASS MAIL

Lynn M. Fraser
Alternative Dispute Resolution Office
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

Re: ADR 332 (PMUR 427), Leo Burnett
Worldwide, Inc. Leo Burnett USA, Inc.,
Raymond T. DeThorne

Dear Ms. Fraser:

On behalf of our clients, Leo Burnett Worldwide, Inc., Leo Burnett USA, Inc., and Raymond T. DeThorne ("Respondents"), thank you for your letter dated November 9, 2006, which we received on November 13, 2006, providing ten (10) business days to provide any response our clients would like to make, including proposed stipulations or terms, to resolve this matter. We would emphasize that this matter was brought to the Commission's attention as a *sua sponte* matter on July 18, 2005. At the time of the conduct at issue in this matter, Mr. DeThorne and Leo Burnett Worldwide's Chief Financial Officer and Chief Executive Officer were not aware that corporate reimbursement for a federal political contribution was impermissible. Upon an internal investigation and on the advice of counsel, Mr. DeThorne repaid the company the full amount of the reimbursement and Respondents voluntarily brought this matter to the Commission's attention.

To resolve this matter, Respondents will agree to waive any right to a refund of this contribution and request that the NRCC disgorge this amount to the U.S. treasury. Leo Burnett Worldwide, Inc. and Leo Burnett USA, Inc. will supplement its corporate policies to emphasize the ban on federal corporate contributions and contribution reimbursements.

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PATTON BOGGS LLP
ATTORNEYS AT LAW

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We are available to discuss a Settlement Agreement on the afternoon of December 4th, the morning of December 5th or any time December 6th. Please let us know of your availability and we look forward to resolving this matter.

Sincerely,



Benjamin L. Ginsberg
Eric S. Brown

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