

January 4, 2008

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**VIA ELECTRONIC MAIL**

Mrs. Lynn Fraser, Assistant Director  
Alternative Dispute Resolution Office  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

**Re: ADR 426 (Chicago Board of Options Exchange, Inc. PAC and Alan J. Dean, Treasurer)**

Dear Lynn:

Pursuant to your December 7, 2007 letter, which provided Respondents an opportunity to make an additional response, I would only add that the keypunch errors mentioned in the ETEXT ATTACHMENT filed on July 16, 2007 were due to a simple misunderstanding by a staff person temporarily filling in for the person who normally prepares and files Respondents' reports (CBOE's Director of Accounting), that the "April Monthly" was to reflect April (instead of March) activity.<sup>1</sup>

As noted in the ETEXT ATTACHMENT, an additional staff person has been added to assist with the preparation and review of reports. To resolve this matter, Respondents propose that this staff person be required to attend a Commission seminar within the next year.

In addition, Respondents will contract with a vendor specializing in the preparation and filing of FEC reports to fulfill their reporting obligations. The vendor will assume this responsibility this month.

I'm available to discuss this matter at your convenience.

Sincerely,



Glenn M. Willard  
Eric S. Brown

<sup>1</sup> This is consistent with the April activity reported in the May Monthly, which shows no receipts or disbursements in April prior to the April 18, 2007 filing of the April Monthly.