



OFFICE OF THE VICE PRESIDENT
WASHINGTON

January 15, 1998

Alva E. Smith
Office of General Counsel
Federal Election Commission
909 E Street NW
Washington, D.C. 20463

Re: MUR 4690

Dear Ms. Smith:

As the designated counsel to the Vice President, I am providing this response to the complaint in the above-referenced matter. As explained below, this complaint is legally and factually insufficient and devoid of any evidence or support; it should accordingly be dismissed by the Commission.

Under the Commission's regulations, a complaint must "contain a clear and concise recitation of the facts which describe a violation of a statute or regulation over which the Commission has jurisdiction." 11 CFR of 111.4(d)(3). The complaint fails to satisfy this threshold requirement.

The complainant has filed two handwritten documents with the Commission, which apparently constitute his complaint. In the first filing (dated October 29, 1997), the complainant concedes that he has no personal knowledge of the matters referenced and that his allegations are based upon information obtained through radio, television and newspaper reports. His "Statement of Facts" however contains no facts, but rather consists entirely of an extensive series of questions directed to the Vice President. No documentation or any other factual material is appended to the filing. The second filing (dated November 1, 1997) fails to remedy the facial deficiency of the first, consisting only of summary allegations entirely devoid of any recitation of facts or other factual support or documentation.

The complaint at issue fails to comply with the applicable legal requirements, and accordingly fails to establish a basis to believe that any violation of the Federal Election Campaign Act of 1971, as amended (2 U.S.C. 431 et seq.) has occurred. Accordingly, the Vice President requests that the Commission close this matter.

Respectfully submitted,

Charles W. Burson
Counsel to the Vice President