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February 3, 1999

*Via Messenger & First Class Mail*

Mr. Seth H. Row, Esq.  
Attorney  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

Re: MUR 4728

Dear Mr. Row:

We write in response to the Commission's letter dated January 19, 1999, and received by us on January 20, 1999, indicating that the Commission has found reason to believe Campaign for Working Families and Francis P. Cannon violated certain reporting provisions of the Federal Election Campaign Act.

Previously, the Commission alleged that CWF and Mr. Cannon failed to file timely 24-hour reports for two independent expenditures. We responded to those allegations in detail in a letter dated May 5, 1998. The Commission now raises entirely new allegations. These latest allegations concern CWF's alleged failure to include in its monthly reports independent expenditures already disclosed by CWF in 24-hour reports, as well as the alleged use by CWF of an inadequate disclaimer in mailings paid for with those independent expenditures.

The eleventh-hour introduction of these new allegations, arising for the most part out of the same transactions addressed in the Commission's earlier letter, requires our clients once again to revisit these transactions and to prepare yet another detailed response. In light of our clients' limited staff resources and the substantial burden that such a review entails, we request that the time for filing a legal and factual response be extended 30 days to Monday, March 8, 1999.

In the meantime, and without conceding the validity of any of the Commission's latest allegations, we would like to proceed with pre-probable cause

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COMMISSION  
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conciliation. We propose to schedule a meeting with you at a mutually convenient time to discuss an appropriate and final resolution of this matter.

Please call me at (202) 662-5350 to let me know when you are available for a meeting.

Sincerely,

A handwritten signature in cursive script, appearing to read "Bobby R. Burchfield".

Bobby R. Burchfield