

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

WILLIAMS & JENSEN
A PROFESSIONAL CORPORATION

LAWYERS

1155 21ST STREET, N.W.

WASHINGTON, D.C. 20036-3308

TELEPHONE

(202) 659-8201

FACSIMILE

(202) 659-5249

JOHN J. McMACKIN, JR.
GEORGE G. OLSEN
ANTHONY J. RODA
JOSEPH L. SEIDEL
DAVID A. STARR
FRANK C. VLOSSAK IV.
MARY LYNNE WHALEN
J. D. WILLIAMS

OF COUNSEL
ROBERT E. JENSEN

*NOT ADMITTED IN D.C.

FEB 11 12:24 PM '00
GEORGE E. BAKER
PHILIP E. BECHTEL
LARICKE D. BLANCHARD
BARBARA W. BONFIGLIO
WILLIAM B. CANFIELD III
BERTRAM W. CARP
WINFIELD P. CRIGLER
TRACY DOHERTY TAYLOR
DAVID E. FRANASIAK
ROBERT E. GLENNON
J. STEVEN HART
DAVID M. LANDERS
KAREN JUDD LEWIS
ROBERT J. MARTINEZ

February 2, 2000

John R. Velasquez, Jr.
Acting Central Enforcement Docket Supervisor
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: Matter Under Review # 4953
Honorable Thomas Dale DeLay

Dear Mr. Velasquez:

As you know, we serve as counsel to Congressman Tom DeLay in the above captioned matter. This letter will serve as the response of Congressman DeLay to the allegations brought to the attention of the Federal Election Commission (the "Commission") by David Plouffe, the Executive Director of the Democratic Congressional Campaign Committee in a letter dated December 8, 1999.

In making these allegations, the complainant relies solely upon a Roll Call article of December 6, 1999 to make the vague assertion that three named organizations (U.S. Family Network, Republican Majority Issues Committee, and Americans for Economic Growth) are "effectively run" by Congressman DeLay. Such an assertion does not constitute, in and of itself, evidence of a violation of the Federal Election Campaign Act of 1974, as amended (the "Act").

In fact, other than naming Congressman DeLay as a respondent in the opening paragraph of the complaint, Mr. Plouffe's sole reference to any action taken by Congressman DeLay with regard to any of the named groups is that Congressman DeLay attended a fundraising event for the Republican Majority Issues Committee. As the Commission knows, an individual's attendance at a fundraising event does not, in and of itself, constitute evidence of a violation of the Act.

Even a cursory review of the complaint in this matter demonstrates that Mr. Plouffe has not established a basis in fact, nor has he provided the Commission with any

reason to believe, that Congressman DeLay has violated any provision of the Act. Accordingly, I would ask that the Commission dismiss this complaint with respect to Congressman Tom DeLay and take no further action against Congressman DeLay.

Sincerely,

WILLIAMS & JENSEN, P.C.

A handwritten signature in black ink, appearing to read "W. B. Canfield III", with a long horizontal flourish extending to the right.

William B. Canfield III
Counsel to Congressman Tom DeLay