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May 31, 2000

**VIA HAND DELIVERY**

Lawrence Noble, Esq.  
General Counsel  
Federal Election Commission  
999 E Street, NW  
Washington, D.C. 20463

**Re: MUR 5004**

Dear Mr. Noble:

This firm serves as counsel for the Commission on Presidential Debates (the "CPD").

On May 2, 2000, the CPD filed a comprehensive response to the complaint filed in MUR 4987 by Patrick J. Buchanan, The Reform Party of the United States of America, Pat Choate, Buchanan Reform and Angela M. Buchanan (collectively, the "Reform Party"). On that same day, the CPD was served with a copy of the complaint filed by the Natural Law Party, John Hagelin and John Moore (collectively, the "Natural Law Party") in MUR 5004.

The complaints in MURs 4987 and 5004 set forth very similar allegations concerning the CPD and its Nonpartisan Candidate Selection Criteria for 2000 General Election Debate Participation, although the two complaints set forth differing alternative selection criteria. The Reform Party, whose nominee qualifies for general election funding, urges that debate participation should turn on such eligibility (as well as constitutional eligibility and ballot access). The Natural Law Party, whose nominee is not qualified for general election funding, anticipates that its nominee will be constitutionally eligible to hold the office of President of the United States and will be on the ballot in a sufficient number of states to have at least a theoretical chance of securing an Electoral College majority. Accordingly, the Natural Law Party urges that those factors are the appropriate criteria for debate participation.

The CPD's May 2, 2000 response filed in MUR 4987, including supporting declarations, responds fully to the allegations now repeated in the complaint in MUR 5004. That response addresses CPD's prior service as a general election debate sponsor, the educational purposes for which the CPD plans to sponsor debates in 2000, and the specific nonpartisan reasons underlying its adoption of its Candidate Selection Criteria for 2000. Accordingly, in response to the complaint filed in MUR 5004, the CPD respectfully submits herewith a complete copy of its May 2, 2000 response in MUR 4987, with all supporting material.

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For the reasons set forth in the attached materials, the CPD respectfully urges that the Commission find that the complaint filed by the Natural Law Party fails to set forth a possible violation of the Act.

Respectfully submitted,

ROSS, DIXON & BELL, L.L.P.

By 

Lewis K. Loss

Stacey L. McGraw

LKL/SLM:djp

Enclosures