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September 26, 2001

VIA FEDERAL EXPRESS

Jeff S. Jordan, Supervisory Attorney
Federal Elections Commission
999 "E" Street, N.W.
Washington, D.C. 20463

RE: MUR 5225
Edward G. Rendell

Dear Mr. Jordan:

This response is submitted on behalf of Edward G. Rendell, one of the respondents in the above-captioned matter. The response addresses the limited allegations in the complaint, forwarded under cover of your letter dated August 10, 2001, that pertain to Mr. Rendell.

Preliminarily, the complaint contains almost no facts concerning Mr. Rendell other than that in February, 2000, he urged Mr. Paul to continue to support DNC events. The complaint sets forth nothing that amounts to any violation by Mr. Rendell of the Federal Election Campaign Act of 1971, as amended (the "Act").

The focus of Mr. Paul's complaint is the handling of contributions Mr. Paul allegedly made, directly or indirectly, to the campaign of Hillary Rodham Clinton for the United States Senate and/or New York Senate 2000 in connection with: (1) a fundraiser at Spago in Beverly Hills on June 9, 2000 and (2) a Hollywood tribute to the President on August 12, 2000. Mr. Rendell had nothing whatsoever to do with either the arrangements or the solicitation of contributions for those events. Mr. Paul sets forth no facts in his complaint to the contrary.

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Jeff S. Jordan, Supervisory Attorney
September 26, 2001
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Mr. Rendell served for a time as General Chairperson of the Democratic National Committee. He had no position whatsoever with the Clinton campaign or New York Senate 2000. Mr. Paul sets forth nothing to the contrary. Further, while Mr. Paul alleges that he made unreported contributions to the Clinton campaign and/or New York Senate 2000, Mr. Paul never once alleges that he made any such contributions to the DNC.

To the best of Mr. Rendell's recollection, he first met Mr. Paul at a DNC campaign event in February, 2000, and did urge Mr. Paul to continue to support and contribute to the DNC. Mr. Rendell recalls meeting Mr. Paul again at other DNC events in May and early June, 2000. While not the focus of MUR 5255, Mr. Rendell does not even know if Mr. Paul or Stan Lee Media, Inc. made any contributions to the DNC in connection with these events, but, if either did, the reporting of those matters would have been handled by the DNC staff in the usual course. Mr. Paul's complaint contains no factual allegations that, at these DNC events, or any other time, Mr. Rendell discussed with Mr. Paul the possibility of his supporting any fundraiser for the Senate campaign of Hillary Rodham Clinton or New York Senate 2000. In actual fact, Mr. Rendell did not.

Further, regarding the two Clinton events that are the focus of the Paul complaint -- the event in June 2000 at Spago's and the Hollywood extravaganza on August 12 -- not only did Mr. Rendell not have anything to do with arrangements or solicitations for these events, Mr. Rendell did not attend the Spago's event and was not even invited to the Hollywood extravaganza. In order to gain admission to the Hollywood tribute on August 12, Mr. Rendell had to seek out an invitation at the last minute.

In conclusion, even if all of Mr. Paul's allegations in MUR 5255 were true, there are none against Edward G. Rendell personally that would amount to any violation of the Act. He has been joined improperly as a respondent in MUR 5255. Accordingly, Mr. Rendell respectfully requests that the Commission dismiss him as a respondent in this matter.

Respectfully,



Mark A. Aronchick

MAA:baw
Enclosures

c: Kim C. Stevenson, Paralegal (via *Federal Express*)
Central Enforcement Docket

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