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VIA FACSIMILE AND U.S. MAIL

February 7, 1999

FEDERAL ELECTION COMMISSION
LISA A. DAVIS PARALEGAL SPECIALIST
OFFICE OF THE GENERAL COUNSEL
999 E. STREET N.W.
WASHINGTON DC 20463

Dear Ms. Davis:

Pursuant to our recent telephone conversation please accept this response to the Conciliation Agreement received by our office. As discussed, it is our desire to explain the circumstances leading to your findings.

During your consideration of this matter, I would like to stress to you that we are an all volunteer organization, consisting of an eclectic Board of Directors who spend less than 10 hours a month working with the organization. Upon my election as Chair of the Board, I immediately recognized that those previously responsible for filings were no longer in a position to help and subsequently hire a professional consultant: the David Gold Co., to begin preparing our state and federal. Although this commitment required a substantial increase in monthly expenses, I fully recognized our responsibility to comply with all election regulations and believed this was the only way to meet our responsibilities.

Therefore you can imagine my shock and dismay when I learned of the late filing of the quarterly report. It is my understanding that a former boardmember, Ken Collins was to have assisted Ms. McIntyre in preparing the documents for Mr. Gould. Having failed to live up to this responsibility, he was asked to leave the board, and Tammy was left on her own to learn the procedure from Mr. Gould. As she was also relatively new and inexperienced, I do not believe she realized the implications of her delays as she regrettably did not ask for assistance in order to expedite the process.

As if this was not frustrating enough, the notification from your office of our need to respond within 30 days, came at the worst possible time. Not only was it a holiday period with most of the board out of town, but it arrived at a time when we were receiving no mail as it was being diverted to the personal residence of former Co Chair Rebecca Chadwick. This unfortunate event occurred when Ms. Chadwick filed a change of address for ECCO Fund Inc., a 501 component of our operation which had been shut down several months before. Add to this the unexpected death of my mother the day before Thanksgiving which caused me to return to Chicago for much of the holiday season and you hopefully will understand why we missed the response deadline.

Please understand that it was not our intent to fail to comply with your regulations. Indeed we have done all in our power to now ensure that our future reports are filed in an accurate and timely manner.

Once again I would like to apologize for any inconvenience caused to Commission Members and Staff and would respectfully and urgently request your reconsideration of this matter.

Please notify me of your response.

Respectfully,


Jeff Letourneau

Chairperson Elections Committee of the County Of Orange