



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 12, 1997

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Greg B. Lam. Esq.
Copilevitz & Canter
423 W. Eighth Street
Suite 400
Kansas City, Missouri 64105

RE: MUR 3774

Dear Mr. Lam:

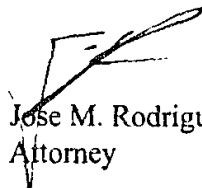
Thank you for your prompt response to our April 14, 1997 letter and the clarifications contained therein. However, certain issues remain unclear. In the "Statement" accompanying your response, you state that The Southern Education Counsel, *et al.* "subcontracted to assist another fundraising firm during this time but have no record of who the parties were or what specific issues were involved." You further note that all Officers and Directors listed in your previous response were consulted in formulating the statement. Your clients' statement seems to suggest, without directly stating it, that the subcontracting activity related to the 1994 Minnesota Senate race, but that no Officer or Director recalls the identity of the entity with which they subcontracted. Please now clarify that the stated subcontracting related to the 1994 Minnesota Senate race, and that none of the individuals contacted in responding to the Commission's request has any recollection of the name of the fund raising firm with whom your clients subcontracted. If your clients do in fact recall the identity of this fundraising firm, please now identify the firm by name and current address.

Also, identify by name the specific entity or entities conducting the subcontracted activity (*i.e.*, Southern Education Counsel, Inc., the Southern Education Counsel Capital Corporation, Civic Development Group, Inc., Southern Education Counsel II, L.L.C., Public Awareness Group, Inc. and Southern Education Fund, Inc.), and the specific activity or duties carried out by each. State by amount, date and source all payments related to the subcontract and for each payment identify by name the specific Southern Education Council entity receiving the payment. Further, identify all persons involved in seeking, negotiating, retaining or otherwise entering into the subcontract, and all persons involved in carry out the terms of the subcontract. Specifically explain in detail each identified person's duties and involvement.

Concerning the requested documents, because there appear to be no other responsive documents in your clients' possession, we seek copies of bank statements and canceled checks for all bank accounts held by each of the organizations comprising the Southern Education Council, *et al.* (Southern Education Counsel, Inc., the Southern Education Counsel Capital Corporation, Civic Development Group, Inc., Southern Education Counsel II, L.L.C., Public Awareness Group, Inc. and Southern Education Fund, Inc.) into which any payments or other funds were deposited, or from which any payments or other disbursements were made, in connection with the subcontracted activity. This request includes all accounts into which transfers were made between the various Southern Education Council entities. Should your clients not have these documents within their possession, for their convenience the Commission can seek these documents directly from the banks. Should your clients prefer this course, we request that they identify each above requested account by name of bank and account number.

We look forward to your continued cooperation in this matter and request that your clients submit responses to these discovery requests under oath within ten days of the receipt of this letter. Should you have any questions, please contact me at (202) 219-3690.

Sincerely,



Jose M. Rodriguez
Attorney