

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL

**WILLIAMS & JENSEN**  
A PROFESSIONAL CORPORATION

LAWYERS

1155 21ST STREET 2003 DEC -2 P 4: 46

WASHINGTON, D.C. 20036-3308

TELEPHONE

(202) 659-8201

FACSIMILE

(202) 659-5249

GEORGE D BAKER  
PHILIP E BECHTEL  
BARBARA W BONFIGLIO  
WILLIAM B CANFIELD III  
BERTRAM W CARP  
DAVID E FRANASIAK  
ROBERT E GLENNON  
A J HARRIS II  
J STEVEN HART  
DAVID M LANDERS  
KAREN JUDD LEWIS  
KARINA V LYNCH  
ROBERT J MARTINEZ

JOHN J McMACKIN, JR  
GEORGE G OLSEN  
ANTHONY J RODA  
ARSHI SIDDIQUI\*  
DAVID A STARR  
JEFFREY A TASSEY  
TRACY DOHERTY TAYLOR  
FRANK C VLOSSAK IV  
J D WILLIAMS

\*NOT ADMITTED IN D C

December 2, 2003

25044110077

Jeff S. Jordan  
Supervisory Attorney  
Central Enforcement Docket  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

RE: MUR 5395  
Cable News Network (CNN)

RECEIVED  
FEC MAIL  
OPERATIONS CENTER  
2003 DEC -2 P 4: 32

Dear Mr. Jordan:

This letter responds to the complaint filed with the Commission by Lenora B. Fulani and the Committee for a Unified Independent Party on November 7, 2003, which was received by CNN on November 24, 2003. Enclosed herewith is a signed Statement of Designation of Counsel. CNN appreciates the opportunity to respond and does so as follows.

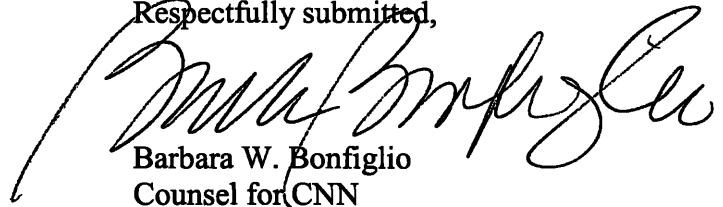
The Complainant alleges that CNN has and/or will violate the prohibition against corporate contributions because of a debate it sponsored on October 9, 2003, in Phoenix, AZ, and, according to Complainant, because CNN will more than likely sponsor other debates in the future. Complainant correctly points out that it requested CNN's criteria for its debates and that CNN provided its criteria as requested (Complainant's Exhibit B).

At the time of the October 9 debate in Arizona, Ms. Fulani was not registered with the Commission as a candidate for the 2004 presidential election. To the best of CNN's knowledge, at the time of the debate, Ms. Fulani had neither raised a significant amount of money nor was she factoring high enough in public opinion polls. Based on these conclusions, CNN did not extend Ms. Fulani an invitation to participate in the October 9 debate. As for any future debates, CNN cannot identify at this time who will be invited to participate, however, it will base its decision on its pre-established criteria.

CNN's coverage of political news stories, including its participation in sponsoring political debates, is not to the benefit of any particular candidate or political party. Notwithstanding the fact that CNN has complied with the Commission's rules regarding the staging of candidate debates, CNN expressly reserves its rights under the First Amendment to the U.S. Constitution. CNN respectfully requests the Commission take no further action against it and dismiss CNN from this MUR.

Again, CNN appreciates the opportunity to respond. If you have any questions regarding this response, please do not hesitate to contact me.

Respectfully submitted,



Barbara W. Bonfiglio  
Counsel for CNN

Cc: Stacey Wolf, Esq.  
CNN

RECEIVED  
FEC MAIL  
OPERATIONS CENTER

2003 DEC -2 P 4: 32

# STATEMENT OF DESIGNATION OF COUNSEL

Please use one form for each respondent

MUR 5395

NAME OF COUNSEL: Barbara Bonfiglio

FIRM: Williams & Jensen, PC

ADDRESS: 1155 21st Street NW

Suite 300

Washington, DC 20036

TELEPHONE: (202) 659-8201

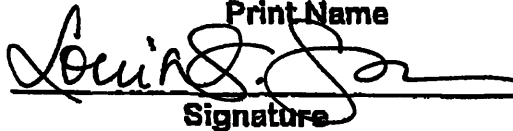
FAX: (202) 659-4953

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

Louise Sams

Print Name

11/26/03  
Date

  
Signature

SVP  
Title

RESPONDENT'S NAME: Cable News Network LP, LLLP

ADDRESS: One CNN Center

Atlanta, GA 30303

TELEPHONE: HOME( ) \_\_\_\_\_

BUSINESS(404 ) 827-3470

25044110079