

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

_____)	
PUBLIC CITIZEN, <i>et al.</i> ,)	
)	
Plaintiffs,)	Civ. No. 14-148 (RJL)
)	
v.)	
)	
FEDERAL ELECTION COMMISSION,)	NOTICE OF FILING
)	
Defendant.)	
_____)	

**DEFENDANT FEDERAL ELECTION COMMISSION’S NOTICE OF FILING OF ITS
CERTIFIED LIST OF CONTENTS OF THE ADMINISTRATIVE RECORD**

The Federal Election Commission hereby provides notice, pursuant to Local Rule 7(n)(1), of its filing of the attached Certified List of Contents of the Administrative Record.

Respectfully submitted,

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Deputy General Counsel

Kevin Deeley
Acting Associate General Counsel

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/s/ Greg J. Mueller
Greg J. Mueller (D.C. Bar No. 462840)
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COUNSEL FOR DEFENDANT
FEDERAL ELECTION COMMISSION
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May 8, 2014

3. Letter from Jeff Jordan, Supervisory Attorney, FEC Complaints Examination & Legal Administration Division, to Glen Allen, CT Corporation System (date-stamped Oct. 21, 2010) (advising of receipt of administrative complaint) and Enclosures* (copy of Administrative Complaint included at AR 1-22; description of FEC procedures for handling complaints and Designation of Counsel form). AR 24-25
4. Letter from Thomas Josefiak and Michael Bayes, Counsel for Crossroads Grassroots Policy Strategies (“Crossroads GPS”), to Christopher Hughey, Esq., FEC Acting General Counsel (dated Oct. 28, 2010) (requesting extension of time to respond re: FEC letter advising of administrative complaint) and Enclosure (completed Designation of Counsel form). AR 26-27
5. Letter from Frankie Hampton, Paralegal, FEC Complaints Examination & Legal Administration Division, to Thomas Josefiak and Michael Bayes, Counsel for Crossroads GPS (dated Nov. 4, 2010) (notifying that requested extension of time was granted) and Attachment (tolling agreement). AR 28-29
6. Letter from Michael Bayes, Counsel for Crossroads GPS, to Frankie Hampton, Paralegal, FEC Complaints Examination & Legal Administration Division (dated Nov. 9, 2010) (noting enclosure of signed tolling agreement) and Enclosure (signed copy of tolling agreement (dated Nov. 9, 2010)). AR 30-31
7. Response of Crossroads GPS (Letter from Thomas Josefiak and Michael Bayes, Counsel to Crossroads GPS, to Christopher Hughey, Esq., FEC Acting General Counsel (dated Dec. 22, 2010)) and Attachments (materials referenced in Response). AR 32-90
8. Email from Mike Bayes, Counsel to Crossroads GPS, to Christopher Hughey, Kathleen Guith, and Frankie Hampton in the FEC Office of General Counsel, with copies to Tom Josefiak and Mike Bayes, re: Crossroads GPS response (dated Dec. 22, 2010) (noting dispatch of hard copy of response for delivery on December 23, 2010) and Attachment* (Response of Crossroads GPS and attachments thereto, included at AR 32-90). AR 91
9. Supplemental Response of Crossroads GPS (Letter from Thomas Josefiak and Michael Bayes, Counsel to Crossroads GPS, to Christopher Hughey, Esq., FEC Acting General Counsel (dated Sept. 9, 2011)) and Exhibits 1-21. AR 92-176

10. Letter from Mark Shonkwiler, FEC Assistant General Counsel for Enforcement, to Thomas Josefiak and Michael Bayes, Counsel to Crossroads GPS (attaching articles that the FEC's Office of General Counsel reviewed and inviting Crossroads GPS to submit any supplemental response by Oct. 11, 2011). AR 177-227
11. Letter from Thomas Josefiak and Michael Bayes, Counsel to Crossroads GPS, to Mark Shonkwiler, FEC Assistant General Counsel for Enforcement (dated Oct. 10, 2011) (supplementing Crossroads GPS's prior responses). AR 228-37
12. Letter from William Powers, Staff Attorney, FEC Enforcement Division, to Thomas Josefiak and Michael Bayes, Counsel to Crossroads GPS (dated Jan. 17, 2012) (providing status report). AR 238
13. Letter from Thomas Josefiak and Michael Bayes, Counsel to Crossroads GPS, to Anthony Herman, FEC General Counsel, copying FEC Chair Caroline Hunter and FEC Vice Chair Ellen Weintraub (dated Apr. 23, 2012) (enclosing two of Crossroads GPS's IRS Form 990 annual returns filed with the Internal Revenue Service). AR 239-339
14. FEC First General Counsel's Report and proposed Factual and Legal Analysis (date-stamped Nov. 21, 2012). AR 340-93
15. Letter from Peter Reynolds, Staff Attorney, FEC Enforcement Division, to Thomas J. Josefiak and Michael Bayes, Counsel to Crossroads GPS (dated Jan. 23, 2013) (providing status report). AR 394
16. Certification by the FEC Deputy Secretary of Commissioners' December 3, 2013 votes in MUR 6396 (certification signed and dated Dec. 5, 2013). AR 395
17. Letter from William Powers, Assistant General Counsel, FEC Enforcement Division, to Corey Platt, Missouri Democratic Party, Complainant (date-stamped Dec. 12, 2013) (providing notification of file closure and noting severance and subsequent merger of allegations originally asserted in MUR 6368 into MUR 6396). AR 396
18. Letter from William Powers, Assistant General Counsel, FEC Enforcement Division, to Kevin Zeese, Complainant (date-stamped Dec. 12, 2013) (providing notification of file closure). AR 397

19. Letter from William Powers, Assistant General Counsel, FEC Enforcement Division, to Thomas Josefiak and Michael Bayes, Counsel to Crossroads GPS (date-stamped Dec. 12, 2013) (providing notification of file closure). AR 398
20. Letter from William Powers, Assistant General Counsel, FEC Enforcement Division, to Craig Holman, Complainant (date-stamped Dec. 23, 2013) (providing notification of file closure). AR 399
21. Statement of Reasons of FEC Chairman Lee E. Goodman and Commissioners Caroline C. Hunter and Matthew S. Petersen (signed and dated Jan. 8, 2014) and Attachment (redacted copy of First General Counsel's Report (dated June 22, 2011), later withdrawn). AR 400-504
22. Statement of Reasons of FEC Vice Chair Ann M. Ravel, Commissioner Steven T. Walther, and Commissioner Ellen L. Weintraub (signed and dated Jan. 9 and 10, 2014). AR 505-09
23. Letter from William Powers, Assistant General Counsel, FEC Enforcement Division, to Kevin Zeese, Complainant (date-stamped Jan. 17, 2014) and Enclosures* (copies of Commissioners' statements of reasons included at AR 400-504 and AR 505-09). AR 510
24. Letter from William Powers, Assistant General Counsel, FEC Enforcement Division, to Kevin Zeese, Complainant (date-stamped Jan. 17, 2014) and Enclosures* (copies of Commissioners' statements of reasons included at AR 400-504 and AR 505-09). AR 511
25. Letter from William Powers, Assistant General Counsel, FEC Enforcement Division, to Craig Holman, Complainant (date-stamped Jan. 17, 2014) and Enclosures* (copies of Commissioners' statements of reasons included at AR 400-504 and AR 505-09). AR 512
26. Letter from William Powers, Assistant General Counsel, FEC Enforcement Division, to Corey Platt, Missouri Democratic Party, Complainant (date-stamped Jan. 17, 2014) and Enclosures* (copies of Commissioners' statements of reasons included at AR 400-504 and AR 505-09). AR 513
27. Letter from William Powers, Assistant General Counsel, FEC Enforcement Division, to Thomas Josefiak and Michael Bayes, Counsel to Crossroads GPS (date-stamped Jan. 17, 2014) and AR 514

Enclosures* (copies of Commissioners' statements of reasons included at AR 400-504 and AR 505-09).

28. Supplemental Statement of Reasons of FEC Chairman Lee E. Goodman and Commissioners Caroline C. Hunter and Matthew S. Petersen (signed and dated Mar. 25, 2014). AR 515-18

Documents from MUR 6368¹

29. Administrative Complaint (date-stamped Sept 2, 2010). AR 519-24
30. Letter from Jeff Jordan, Supervisory Attorney, FEC Complaints Examination & Legal Administration Division, to Corey Platt, Complainant (date-stamped Sept. 8, 2010) (acknowledging receipt of administrative complaint) and Enclosure* (description of FEC procedures for handling complaints). AR 525
31. Letter from Jeff Jordan, Supervisory Attorney, FEC Complaints Examination & Legal Administration Division, to Glen Allen, CT Corporation System (date-stamped Sept. 8, 2010) (advising of receipt of administrative complaint) and Enclosures* (copy of Administrative Complaint included at AR 520-25; description of FEC procedures for handling complaints and Designation of Counsel form). AR 526-27
32. Letter from Thomas Josefiak and Michael Bayes, Counsel to Crossroads GPS, to Christopher Hughey, Esq., FEC Acting General Counsel (dated Sept. 16, 2010) (requesting extension of time to respond re: FEC letter advising of administrative complaint) and Enclosure (completed Designation of Counsel form). AR 528-29
33. Letter from Frankie Hampton, Paralegal, FEC Complaints Examination & Legal Administration Division, to Thomas Josefiak and Michael Bayes, Counsel to Crossroads GPS (dated Sept. 21, 2010) (notifying that requested extension of time was granted). AR 530
34. Letter from Mark Shonkwiler, Assistant General Counsel, FEC Enforcement Division, to Thomas Josefiak and Michael Bayes, AR 531

¹ As explained earlier, these documents concern allegations from MUR 6368 that were severed from that MUR and merged into MUR 6396, as well as other alleged violations that were not merged into MUR 6396. The complete versions of the documents are included because the relevant portions are not easily segregable from the portions involving allegations that are not at issue in this case.

Counsel to Crossroads GPS (date-stamped Oct. 14, 2011)
(providing status report).

35. Response of Crossroads GPS (Letter from Thomas Josefiak and Michael Bayes, Counsel to Crossroads GPS, to Christopher Hughey, Esq., FEC Acting General Counsel (dated October 29, 2010)) and Attachments (affidavits referenced in Response). AR 532-39
36. FEC First General Counsel's Report and proposed Factual and Legal Analysis (date-stamped Nov. 8, 2012). AR 540-60
37. Certification by the FEC Deputy Secretary of Commissioners' January 8, 2013 votes in MUR 6368 (certification signed and dated Jan. 9, 2013) (certifying vote to sever certain allegations from MUR 6368 and merge them into MUR 6396). AR 561-62
38. Letter from Mark D. Shonkwiler, Assistant General Counsel, FEC Enforcement Division, to Thomas Josefiak and Michael Bayes, Counsel to Crossroads GPS (date-stamped Jan. 16, 2013) (providing notification of file closure and severance and merger of certain allegations into MUR 6396). AR 563
39. Letter from Mark D. Shonkwiler, Assistant General Counsel, FEC Enforcement Division, to Corey Platt, Missouri Democratic Party (date-stamped Jan. 16, 2013) (providing notification of file closure and severance and merger of certain allegations into MUR 6396). AR 564

IN TESTIMONY WHEREOF, the Acting Secretary and Clerk of the Federal Election Commission, being duly authorized, has set her hand and affixed the seal of the Federal Election Commission in the city of Washington, District of Columbia, this 8th day of May, 2014.


Shelley E. Garr
Acting Secretary and Clerk
Federal Election Commission