

FEDERAL ELECTION  
COMMISSION

August 23, 2018

2018 AUG 29 AM 9:03

Jeff S. Jordan  
Federal Elections Commission  
1050 First Street, NE  
Washington, DC 20463

CELA

RE: MUR 7393

Dear Mr. Jordan:

The Scholten4Iowa Campaign Committee (“Campaign”) received your office’s complaint, MUR 7393 (“Complaint”), alleging that the Campaign mailed an advertisement, attached to MUR 7393 as Exhibit A (“Mail Piece”), without a proper disclaimer. This letter serves as the Campaign’s response, detailing its stance on the Complaint and its actions to achieve and maintain proper compliance moving forward.

Our stance is that the Complaint is correct. The Mail Piece should have featured a disclaimer, in 12 point font and within a box, stating “Paid for by Scholten4Iowa Campaign Committee” and it did not. This mistake should not have ever occurred, and the Campaign has taken the following actions to make sure such mistakes never occur again. These measures include:

- Obtaining the services of myself, Scott M. Hubay of Hubay LLC<sup>1</sup>, to serve as the Campaign’s legal counsel and Treasurer. I have experience with several federal campaigns; my duties chiefly include reviewing all campaign communications to ensure proper compliance with Federal or any other applicable law.
- Hiring Irene Lin as the Campaign’s Campaign Manager. She also has experience on several federal campaigns, and as such, is familiar with the FEC’s disclaimer requirements on campaign communications.
- Replacing the vendor, Path to Victory LLC, that produced the Mail Piece with a more experienced direct mail consultant, Wildfire Contact (“Wildfire”). Wildfire has offices in Washington DC, Des Moines, and Chicago, and was founded by veterans of the Barack Obama campaign for President<sup>2</sup>.

<sup>1</sup> See more here: <https://www.hubayllc.com/>

<sup>2</sup> See more here: <https://www.linkedin.com/company/wildfire-contact/>

The Campaign is fully confident that these measures will prevent any compliance violations from occurring in the future, while taking full responsibility for any violations that occurred previously.

If you have any questions or requests of the Campaign, or require additional clarification, do not hesitate to contact me at [scott@hubayllc.com](mailto:scott@hubayllc.com), or at (216) 282-6732.

Sincerely,



Scott M. Hubay, Esq.  
Treasurer and Legal Counsel  
Scholten4Iowa Campaign Committee