

SCOTT BAUGH

VIA Facsimile & First Class Mail

August 18, 2010

Federal Elections Commission
 c/o Kathleen Guith
 Acting Associate General Counsel
 Enforcement
 999 E. Street, NW
 Washington, D.C. 20463

Re: MMB 6279

Dear Ms. Guith,

Pursuant to your undated letter received by me on August 2, 2010, I am responding on behalf of U.S. Dry Cleaning Corp., Robert Lee, Regina Lee, Tim Denari, Mary Denari, Riaz Chauthani, and Donna Chauthani. This letter is in response to your invitation for an amplification of our earlier response to Ms. Collins that no action should be taken against U.S. Dry Cleaning Corp. or any of the individuals listed above.

As stated in my previous letter to Ms. Collins, Robert Lee, Tim Denari, Riaz Chauthani and Mr. Ogbe all worked for U.S. Dry Cleaning Services Corporation. Each one of these individuals, along with each of their spouses, made a \$4,800 contribution to Senator David Vitter's campaign on or about August 20, 2009.

Msrs. Lee, Denari, Chauthani and Ogbe, at the relevant times, were senior employees in management at U.S. Dry Cleaning Services Corporation. Each of them was owed significant amounts of money in back wages. When funds became available to make progress on back wages, the Company wrote checks to these employees. The funds paid to these employees were earned wages. Moreover, the funds paid out reduced the amount that the Company owed to these individuals.

Enclosed with this letter is an affidavit from Stacy Galeano. She is the Manager of the Accounts Payable Department at U.S. Dry Cleaning Corp. Attached to her affidavit are four schedules that are printed from the accounting system at U.S. Dry Cleaning Corp. They are listed as "Transaction List by Vendor." Each employee is a separate vendor. The documents are from January 2009 through August 2009.

As you can see from each "Transaction List" there is a balance owing to each employee in January. For example, Robert Lee is owed [redacted] in January of 2009. Each month he had

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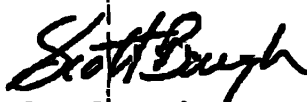
a salary and other benefits owed to him by the Company that would accumulate and be added to the total owed to him. As you can also see, numerous payments were made to him as well under the "suspense" category. Those items were submitted from what was owed to him. If you go to the end of July, you will see that the Company owed Mr. Lee: [redacted] In the month of August, he accumulated an additional [redacted] in money owed to him for salary and benefits. You will also see that he was paid 5 suspense items totaling [redacted] which amount was reduced from what the Company owed Mr. Lee. Included in this [redacted] amount is a suspense check for \$9,600 which likewise reduced the amount owed to Mr. Lee by the Company.

The same analysis applies to Mr. Jamal Ogbe, Tim Denari, and Riaz Chauthani as revealed in the Transaction List by Vendor applicable to those employees. In point of fact, you will see that in all cases a negative number still existed for each employee. The meaning of this is quite clear. The employees were neither "reimbursed" for the transaction, nor were they given "advance" money for the transaction to Senator Vitter's campaign. Rather, they were each provided money that was owed to them by the Company.

In short, Mr. Ogbe is alleged to have concluded that he was reimbursed for the contribution he made to Senator Vitter's campaign. Mr. Ogbe is misguided in his understanding if that is in fact what he claims. He was simply paid back wages that were owed to him as reflected in the enclosed accounting.

Thank you for the opportunity to amplify our response, and let me know if I can provide you with any further information.

Sincerely,



Scott R. Baugh

w/enclosure

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