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OFFICE OF GENERAL
COUNSEL

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Also admitted to practice in Pennsylvania

September 8, 2010

Jeff S. Jordan
Supervisory Attorney, Complaints Examination
Federal Election Commission
999 E. Street NW
Washington, DC 20463

**RE: Response of Steel Equipment Specialists, LLC to Complaint
MFUR 6353**

Dear Mr. Jordan:

This law firm represents Steel Equipment Specialists, LLC ("SES, LLC") with respect to the complaint received in the above-referenced matter directed at Renacci for Congress. I am attaching a copy of the Designation of Counsel previously submitted by SES. This response to the complaint is timely, as it is made within 15 business days of receipt of the complaint. In the complaint, the complainant contends that SES and a separate entity (Morgan Enterprises) provided impermissible in-kind corporate contributions to the campaign committee of Jim Renacci in connection with an August 12, 2010 event.

The current invitation, which is attached to the complaint as Exhibit 1, makes clear that SES is a limited liability company. The invitation (Complaint Exhibit 1) specifically identifies: "SES, LLC, Attn: Brooke McCarty, 1507 Beaman Street, Alliance, OH 44601". SES, LLC has been an actively registered limited liability company with the State of Ohio since December 6, 1999 (registration number 1122446). [See Affidavit of Scott E. Steidman, Chief Financial Officer of SES, LLC]. Further, SES, LLC has elected to be treated as a partnership by the Internal Revenue Service, which election has been approved. [See Steidman Affidavit].

Accordingly, the claims set forth in the complaint do not apply to SES, LLC. Pursuant to 11 C.F.R. 110.1(g), any contribution by an LLC that elects to be treated as a partnership by the IRS, or does not elect treatment as either a partnership or a corporation, shall be considered a contribution from a partnership pursuant to 11 C.F.R. 110.1(e). Therefore, SES, LLC respectfully requests that no action be taken against them with respect to the complaint.

Moreover, the amount of the alleged "contribution" by SES, LLC is relatively minor in nature and SES has taken no action in bad faith. As SES, LLC has taken this matter seriously, it reviewed all potential items of value that could even arguably have been said to have been contributed by SES, LLC to the campaign. The

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total amount of the alleged contribution is \$719.54. [See Stedman Affidavit]. This amount includes costs for paper, copies, postage, signs, flower centerpieces, and time involved.

Based on the foregoing, SES respectfully requests that this matter be closed with respect to SES.

Very truly yours,

KRUGLIAK, WILKINS, GRIFFITHS
& DOUGHERTY CO., L.P.A.



Owen J. Rarric

Enc.

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FEDERAL ELECTION COMMISSION

999 E Street, NW
Washington, DC 20483

STATEMENT OF DESIGNATION OF COUNSEL

Please use one form for each Respondent/Entity/Treasurer
FAX (202) 219-8928

MUR # 6353NAME OF COUNSEL: Randall C. Hunt and Owen J. ParricFIRM: Krugliak, Wilkins, Griffiths & Dougherty Co., L.P.A.ADDRESS: 4775 Maroon St., N.W., P.O. Box 36963Canton, Ohio 44735-6963TELEPHONE- OFFICE (330) 497-0700FAX (398) 497-4020

The above-named individual and/or firm 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.

8/23/10

Date

Respondent/Agent-Signature

Scott E. Stedman

CFO

Title (Treasurer/Candidate/Owner)

CFO

NAMED RESPONDENT: Steel Equipment Specialists, LLCMAILING ADDRESS: 1507 Beacon St., Alliance, Ohio 44601
(Please Print)Attn: Scott E. Stedman, CFO

TELEPHONE- HOME ()

BUSINESS (330) 821-3322

Information is being sought as part of an investigation being conducted by the Federal Election Commission and the confidentiality provisions of 2 U.S.C. § 437g(a)(1)(A) apply. This section prohibits making public any investigation conducted by the Federal Election Commission without the express written consent of the person under investigation.

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