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October 19, 2010

VIA TELECOPIER AND US MAIL

Mr. Jeff S. Jordan, Esq.
Supervisory Attorney
Complaints Examination & Legal Administration
900 E Street, N.W.
Washington, D.C. 20463

Re: **MUR 6368**
Gordon A. Elliott, Friends of Roy Blunt and Roy Blunt

Dear Mr. Jordan:

Please accept the following response filed on behalf of Friends of Roy Blunt, Treasurer Gordon Elliott and Roy Blunt individually (collectively, the "Respondents") with respect to the complaint filed by the Missouri Democratic Party (the "MDP"), MUR 638 (the "Complaint").

As would be expected in a contentious election in which the Respondents appear poised to capture the United States Senate seat the Missouri Democratic Party covets, the MDP has filed this entirely baseless and speculative Complaint apparently designed more to create noise in a single press cycle than to present an actionable complaint for the Commission. The current Complaint represents yet another burden to the Commission's overwhelming workload in pursuit of a news cycle that has long-since passed. Fortunately, however, the current Complaint is so speculative, and so lacking in merit on its face that immediate dismissal of the Complaint should be the relatively obvious course of action.

The utter lack of factual support for the MDP's coordination allegation is striking, even when judged against the standard of numerous other desperate filings received by the Commission in an election season. Here, to support an otherwise completely unsupported allegation that Respondents have conspired with an outside group, the MDP is forced to rely on newspaper accounts of conversations and breakfast meetings that occurred between Congressman Blunt and Karl Rove *between 1999 and 2004!* (Complaint, p. 2). Absolutely no

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evidence is presented to support an allegation that any electioneering communications or other expenditures by Crossroads GPS were coordinated with Respondents.

Likewise, there is absolutely no evidence whatsoever proffered in the Complaint or otherwise, to support an allegation of wrongdoing pertaining to Karl Rove's participation in an internet-based communication *that Respondents paid for*. MDP's sole "evidence" in support of their pseudo-claim is speculation that Karl Rove would only have hesitated from appearing with the Respondents due to the ultra-secret, "insider only" knowledge, that a potential element of Respondent's campaign messaging in Congressman Roy Blunt's candidacy as a Republican for a United States Senate seat might be his opposition to the Obama healthcare agenda (Complaint, p. 4-5). To state the MDP's laughable assertion is to refute it. Absolutely no evidence exists to support an allegation of coordinating "conduct" between Respondents and Crossroads GPS.

No coordination has occurred between Respondents and anyone; including Karl Rove and Crossroads GPS. No campaign finance violation has occurred. As claims to the contrary have absolutely no basis in fact and the Commission need not give this matter further investigation or action, the Complaint should be immediately dismissed as it pertains to the Respondents. For these reasons, the Commission should appropriately dismiss the Complaint against the Respondents and find no reason to believe that the Respondents have violated the Act or the regulations promulgated thereunder.

Please do not hesitate to contact me if you require further information. Thank you.

Very Truly Yours,


Stefan C. Passantino