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2011 JUN -7 AM 10:48



P. Christopher Hughey
Federal Election Commission
Washington, D.C. 20463

OFFICE OF GENERAL
COUNSEL
May 31, 2011

RE: MUR 6425

Dear Mr. Hughey,

Per your questions for clarification in your May 20, 2011 letter, please find the following response:

- 1) The effort to stop the sale of Anheuser-Busch that was named "SaveAB.com" was, from its inception, a loose association of people and never took on a legal status. It might be best to refer to it as the SaveAB.com grassroots effort. As stated previously, a number of different groups and individuals chipped in to make this grassroots effort happen; specifically, they all acted as independent grassroots participants.
- As shown on the paperwork submitted to you previously, I started a Missouri non-profit corporation called "SaveAB.com for America" in case the SaveAB.com grassroots effort continued for a longer period of time and those of us involved had reason to utilize it. Sadly, the SaveAB.com grassroots effort did not continue and ended abruptly with the announcement of the sale of A-B to InBev; the non-profit corporation I founded was never used, never had any assets, and never even had any organizational meetings.
- Anything that the participants created or gathered during the grassroots effort - whether information, photographs, placard, shirts, etc. - during their part in the SaveAB.com effort was kept by each person individually. I cannot be certain but I think that most of these were not shared or divided. For example, some participants gathered signatures with addresses but these were never centrally maintained. The website www.SaveAB.com was continually maintained by Mike Smith of Miken as were the data collected by the website.
- 2) In referring to "we" in page 2 of my previous letter, I was referring to the 2009 decision to send an email and otherwise more forcefully inform folks that SaveAB.com efforts were over. This 2009 decision was made after my law office and others from the SaveAB.com grassroots effort received repeated inquiries asking for comment and interview regarding the first anniversary of the sale of Anheuser-Busch. There was speculation that an effort like the one we had spearheaded back in 2008 might be used to take up the issue of boycotts or protests. Because I had been the point person on most of the press-related questions in the past (and my law office was the primary research used for the effort), I was frequently being asked to comment in 2009. As I recall, I initiated the idea of sending an email to end the discussion and questions about the SaveAB.com grassroots effort but am not sure who else spoke about it. Since Mike Smith of Miken was the operator of the website and email system, I feel certain I spoke with him. Again, our reason for the email (and the carefully worded content) was to alert people that there was nothing more happening. This was a personal decision based on my impression of the media calls.

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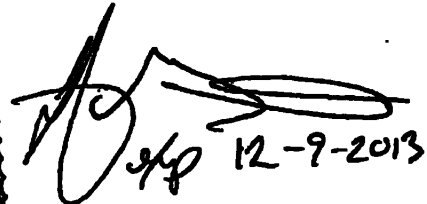
3) The effort that was referred to as "SaveAB.com" ended immediately after the sale of A-B was announced: the many people parted without fanfare or farewell. Planets were discarded, stickers given away, and the organizers otherwise dispersed. Immediately after the sale was announced, I did receive calls and media inquiries asking us to start a boycott or comment on aspects of the sale; however, we had ended SaveAB.com's effort immediately after the sale announcement. As previously mentioned, near the first anniversary of the closing of the sale of A-B, I received calls and inquiries which precipitated the email referenced in this complaint. When referring to "the SaveAB.com effort was over" in my previous statement, I meant to convey that our effort in December 2009 was to make sure that no one thought we were still active or commenting and that this seemed effective as we stopped getting calls and have not since. In 2009, there was no legal entity of any kind: SaveAB.com for America did not exist as an entity; the SaveAB.com grassroots effort was tang. ended; and what was left was only the individuals who cared about the issues.

If I can assist in any other way, please let me know.

Sincerely yours,



Ed Martin



12-9-2013