



LECLAIRRYAN

RECEIVED
FEDERAL ELECTION
COMMISSION

2011 MAY -2 PM 12:07

OFFICE OF GENERAL
COUNSEL

April 28, 2011

Jeff S. Jordan, Esq.
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: Matter Under Review 6467
Response of Brian Plum

Dear Mr. Jordan:

Brian Plum received your notice of a complaint in this matter on April 19, 2011. This letter responds to the complaint you forwarded. Enclosed is an executed form designating undersigned counsel to represent Mr. Plum.

By way of a brief background, the Republican Party of Virginia ("RPV") is the official Republican party committee in the Commonwealth of Virginia. RPV has established a federal account that is registered with the FEC (identification number C00001305) and reports its financial activity on a regular basis. Brian Plum is RPV's Treasurer.

Certain subordinate Republican groups form what are known as "congressional district committees" and they focus their activities on elections in their regions. Although these congressional district committees are recognized by RPV as official Republican organizations, they elect their own leadership, conduct their own meetings and affairs (subject to organizational bylaws established by RPV), determine their own local political activities, and some of them (but not all) establish federal political committees. Those that establish federal committees appoint their own treasurers who are responsible for compliance with the Federal Election Campaign Act and FEC reporting regulations. The complaint filed with the FEC concerns one of those congressional district committees, the Virginia 3rd Congressional District Committee (C00496946), and its Treasurer, Arthur Talley.

The complaint is cryptic, but it is clear from reading the complaint that it does not allege any misconduct by Mr. Plum. The complaint alleges only that Mr. Plum, as Treasurer of RPV, was asked by the Chairman and/or Treasurer of the Virginia 3rd Congressional District Committee to perform an outside review of that Committee's financial records as a courtesy. The complaint attaches email communications between Mr. Plum and members of the Committee. These communications confirm that Mr. Plum's limited and only role in the matters alleged was to review informally the Committee's financial records as a volunteer, external reviewer.

E-mail: Lee.Goodman@LeClairRyan.com
Direct Phone: 202.659.5780
Phone: 202.659.4140

1101 Connecticut Avenue, NW, Suite 800
Washington, D.C. 20036
Fax: 202.659.4130

CALIFORNIA \ CONNECTICUT \ MASSACHUSETTS \ MICHIGAN \ NEW JERSEY \ NEW YORK \ PENNSYLVANIA \ VIRGINIA \ WASHINGTON, D.C.
ATTORNEYS AT LAW \ WWW.LECLAIRRYAN.COM

11044304520

Jeff S. Jordan, Esq.
April 28, 2011
Page 2 of 2

Because the complaint does not allege any misconduct by Mr. Plum, and because no plausible theory of a violation of the Federal Election Campaign Act or FEC regulations can be inferred from his limited involvement, we respectfully request that the FEC take no further action with respect to Mr. Plum and dismiss him from this matter forthwith.

Sincerely,

A handwritten signature in black ink, appearing to read "Lee E. Goodman", with a stylized flourish at the end.

Lee E. Goodman

enclosure

11044304521

RECEIVED
FEDERAL ELECTION
COMMISSION

2011 MAY -2 PM 12:07

OFFICE OF GENERAL
COUNSEL

FEDERAL ELECTION COMMISSION
999 E Street, NW
Washington, DC 20463

STATEMENT OF DESIGNATION OF COUNSEL
Please use one form for each Respondent/Entity/Treasurer
FAX (202) 219-3923

MUR # 6467NAME OF COUNSEL: Lee E. GoodmanFIRM: LeClairRyan PC

ADDRESS: 1101 Connecticut Ave., NW, 6th Floor
Washington, DC 20036

TELEPHONE- OFFICE (202) 659-6730FAX (202) 775-6430

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.

4/26/11
 Date

[Signature]
 Respondent/Agent - Signature

Treasurer
 Title (Treasurer/Candidate/Owner)

NAMED RESPONDENT: Brian Plum

MAILING ADDRESS: 115 East Grace Street, Richmond
 (Please Print)
VA 23219

TELEPHONE- HOME ()

BUSINESS (804) 780-0111

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)(12)(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

11044304522