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VIA E-MAIL AND BY FIRST CLASS MAIL

Jeff S. Jordan, Esquire
Assistant General Counsel
Complaints Examination & Legal Administration
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Re: MUR 6981 – Sheldon Adelson

Dear Mr. Jordan:

On behalf of Sheldon Adelson, this will respond to the allegations in MUR 6981. The Complainant in this matter, the Campaign for Accountability ("CfA"), has since withdrawn its complaint, retracted the admittedly false allegations upon which it was based and expressed "regret" at their request for an investigation of Mr. Adelson. CfA issued a public statement admitting that: "The allegations relied upon in making the requests are false" and expressing "regret" for their "statements and actions." http://campaignforaccountability.org/cfa-statement-regarding-sheldon-adelson/

The request for withdrawal was sent to Daniel A. Petalas, FEC General Counsel, on November 25, 2015.

To restate the obvious, the withdrawn complaint has no factual or legal basis. Filed as a naked attempt to squelch a political opponent's voice, it is quite outrageous that CfA would even file a complaint asking the Commission to investigate a political opponent based on discredited charges that it thinks makes it "quite likely" some nefarious activities have taken place. That CfA has withdrawn its Complaint makes it imperative that the Commission promptly dismiss this Matter.

As for the specific allegations, all funds Mr. Adelson has contributed to U.S. elections come from his personal earnings derived from his holdings in U.S. companies (as is clearly permissible under the Federal Election Campaign Act and numerous FEC Advisory Opinions). Mr. Adelson has never contributed or used illegal foreign money in a U.S. election. As a matter of settled law, an individual conducting business overseas is not automatically banned from

contributing in U.S. elections, the absurd premise upon which CfA based its allegations even before it admitted the falsity of its factual assertions and withdrew its complaint.

Furthermore, Mr. Adelson makes all his own decisions on his political contributions. He has no current relationship with the two foreign nationals CfA wrongly injected into the now-withdrawn complaint based on pure conjecture. To insinuate based on absolutely nothing that Mr. Adelson acted "with the assistance" of two foreign nationals and somehow violated the Act explains why CfA had to embarrassingly withdraw its complaint in this matter.

The request to withdraw MUR 6981 by the Complainants demonstrates the falsity of the accusations and insinuations upon which the complaint is based. Any further action by the Commission would only wrongly legitimize the baseless and inflammatory allegations CfA itself has, after filing this complaint, admitted are false. The Commission must vote promptly to find no reason to believe and dismiss this matter.

Respectfully submitted,

Benjamin L. Ginsberg

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