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CELA

June 2, 2016

Via E-Mail

Jeff S. Jordan, Esq.
Supervisory Attorney
Federal Election Commission
999 E Street, N.W.
Washington D.C. 20463

Re: MUR 7062

Dear Mr. Jordan:

I serve as counsel for Ro for Congress and Reena Rao, in her official capacity as Treasurer. By way of background, Ro for Congress is the authorized committee of Rohit Khanna. Mr. Khanna is a candidate for the United States House of Representatives for the 17th District of California.

I write to respond to a complaint filed against Ro for Congress by Glen Shaffer. Mr. Shaffer is a well-known blogger who goes by the name of Glen the Plumber. Mr. Plumber is an avid supporter of Mr. Khanna opponent, Mike Honda. Mr. Plumber has attacked Mr. Khanna many times on the Internet in both blog posts and on social media. This is not a complaint by a concerned citizen, but rather, another in a series of frivolous complaints intended to distract from Mike Honda's own ethical problems. See MUR 6998.

Although the complaint does not allege any cognizable violation of federal campaign laws, it appears to allege that Mr. Khanna may have violated campaign finance laws by sending emails to certain people that were supporters of Mike Honda. Although the committee acknowledges that it adds email addresses from communications that it receives to its master email list, this practice does not implicate ANY provision of Federal campaign finance law. To be sure, the Khanna campaign takes its responsibilities to not send spam email to its supporters and allows any recipient of an email from the campaign to opt out from future emails from the

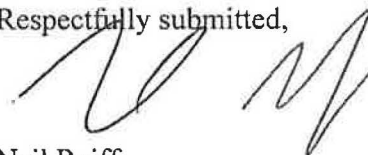
campaign. Of course, the practice of email maintenance and removing opt out requests is not within the purview of the Federal Election Campaign Act or the Federal Election Commission.

With respect to the email addresses referenced in the complaint, both Mr. Shaffer and Jill Chesler were both prior acquaintances of Mr. Khanna and as previously stated in MUR 6998, Mr. Khanna's campaign has sent fundraising emails to individuals on his personal email lists to raise funds for his campaign. Therefore, the allegation that either of these individuals was added to the Khanna for Congress email list based upon the email attached to the complaint is simply untrue. Mr. Khanna had communicated with both Ms. Chesler and Mr. Shaffer personally, by email as early as 2014.

Mr. Shaffer also refers to a software program used by the Khanna campaign (as well as many other Democratic and Republican candidates) called RevUp. The use of RevUp has no relationship to the acquisition of email addresses and is not designed or used to acquire email addresses. RevUp's sole purpose is to allow persons who send customized emails by using an analytical tool to tailor their request for contributions. The emails referred to in this complaint were mass emails and had absolutely nothing to do with RevUp. In addition, our campaign has been assured by RevUp that its software and its analytical methods are fully compliant with any and all FEC rules.

This complaint by "Glen the Plumber" is pure politics, plain and simple. There are no facts alleged in Mr. Shaffer's complaint that properly states a violation of Federal campaign finance laws or the Commission's regulations. The Commission must address the misuse of its complaint process and immediately dismiss this complaint and other coordinated, and equally frivolous complaints that are designed to distract and confuse the voters of the Seventeenth District.

Respectfully submitted,



Neil Reiff
Counsel for Ro for Congress, and Reena
Rao, in her official capacity as Treasurer