

ARNOLD & PORTER LLP

CELA

Kirk Ogrosky
Kirk.Ogrosky@aporter.com

+1 202.942.5330
+1 202.942.5999 Fax

555 Twelfth Street, NW
Washington, DC 20004-1206

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email=drawls@fec.gov, c=US
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August 1, 2016

VIA EMAIL

Attn: Donna Rawls, Paralegal
Federal Election Commission
Office of Complaints Examination and Legal Administration
999 E Street, NW
Washington, DC 20436

RE: *MUR 7101 – Vitreo Retinal Consultants of the Palm Beaches*

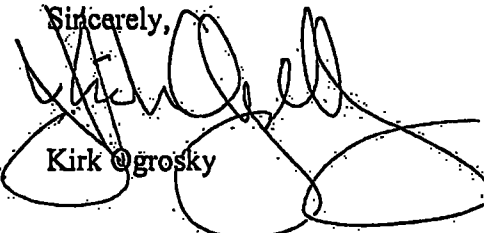
Dear Ms. Rawls,

We represent Vitreo Retinal Consultants of the Palm Beaches, P.A. (“VRC”) in connection with FEC matter MUR 7101. We have recently received the July 14, 2016 letter to VRC from FEC Assistant General Counsel Jeff S. Jordan. A copy of that letter and its accompanying documents are attached hereto as Exhibit A.

Mr. Jordan’s letter states that the FEC has “received a complaint that indicates [VRC] may have violated the Federal Election Campaign Act,” and that “[a] copy of the complaint is enclosed.” This is incorrect. The letter does not attach “a copy of the complaint” as required by 11 C.F.R. § 111.5(a). It attaches only excerpts of a complaint, filed by several members of Congress and others against 11 independent expenditure committees. These excerpts are missing pages 24-26 and 30-32. In the excerpts that were provided, there are no references to VRC.

Obviously, without notice of the full complaint’s allegations, VRC cannot meaningfully exercise its constitutionally guaranteed opportunity to be heard. If the FEC seeks VRC’s response to the complaint, it must provide a complete copy to VRC. Until VRC receives such a copy, the FEC has not triggered any deadline for VRC’s response. See 11 C.F.R. § 111.6(a).

Sincerely,



Kirk Ogrosky

Attachment



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

JUL 14 2016

Vitreo-Retinal Consultants of the Palm Beaches
2521 Metrocentre Blvd
West Palm Beach, FL 33407

RE: MUR 7101

Dear Sir or Madam:

The Federal Election Commission received a complaint that indicates Vitreo-Retinal Consultants of the Palm Beaches may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 7101. Please refer to this number in all future correspondence.

The Act affords you the opportunity to demonstrate in writing that no action should be taken against Vitreo-Retinal Consultants of the Palm Beaches in this matter. If you wish to file a response, you may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Where appropriate, statements should be submitted under oath by persons with relevant knowledge. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with 52 U.S.C. § 30109(a)(4)(B) and § 30109(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. Please be advised that, although the Commission cannot disclose information regarding an investigation to the public, it may share information on a confidential basis with other law enforcement agencies.¹

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission. Please note that you have a legal obligation to preserve all documents, records and materials relating to the subject matter of the complaint until such time as you are notified that the Commission has closed its file in this matter. See 18 U.S.C. § 1519.

¹ The Commission has the statutory authority to refer knowing and willful violations of the Act to the Department of Justice for potential criminal prosecution, 52 U.S.C. § 30109(a)(5)(C), and to report information regarding violations of law not within its jurisdiction to appropriate law enforcement authorities. *Id.* § 30107(a)(9).

Any correspondence sent to the Commission, such as a response, must be addressed to one of the following (note, if submitting via email this Office will provide an electronic receipt by email):

Mail

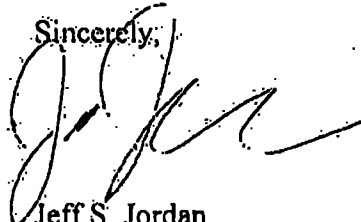
Federal Election Commission
Office of Complaints Examination
and Legal Administration
Attn: Donna Rawls, Paralegal
999 E Street, NW
Washington, DC 20436

Email

drawls@fec.gov &
jjordan@fec.gov

If you have any questions, please contact Donna Rawls at (202) 694-1650 or toll free at 1-800-424-9530. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,



Jeff S. Jordan
Assistant General Counsel
Complaints Examination &
Legal Administration

Enclosures:

1. Complaint
2. Procedures
3. Designation of Counsel Statement

cc: Registered Agent
RA Corporate Services, Inc.
9400 S Dadeland Blvd.
Suite 600
Miami, FL 33156



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 # _____

NAME OF COUNSEL: _____

FIRM: _____

ADDRESS: _____

TELEPHONE- OFFICE (____) _____

FAX (____) _____ Web Address _____

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.

 Date Respondent/Agent -Signature Title(Treasurer/Candidate/Owner)

RESPONDENT: _____
 (Committee Name, Company Name, or Individual Named in Notification Letter)

MAILING ADDRESS: _____
 (Please Print)

TELEPHONE (H) _____ (W) _____

E-Mail: _____

This form relates to a Federal Election Commission matter that is subject to the confidentiality provisions of 52 U.S.C. § 30109(a)(12)(A). This section prohibits making public any notification or investigation conducted by the Federal Election Commission without the express written consent of the person under investigation

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DESCRIPTION OF PRELIMINARY PROCEDURES
FOR PROCESSING COMPLAINTS FILED WITH THE
FEDERAL ELECTION COMMISSION

999 E Street, NW
Washington, D.C. 20463
FAX (202) 219-3923

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Complaints filed with the Federal Election Commission shall be referred to the Enforcement Division of the Office of the General Counsel, where they are assigned a MUR (Matter Under Review) number and forwarded to Complaints Examination & Legal Administration ("CELA") for processing. Within five days of receipt of the complaint, the Commission shall notify all respondents referenced in the complaint, in writing, that the complaint has been filed, and shall include with such notification a copy of the complaint. Simultaneously, the complainant shall be notified that the complaint has been received. The respondents shall then have 15 days to demonstrate, in writing, that no action should be taken against them in response to the complaint. If additional time is needed in which to respond to the complaint, the respondents may request an extension of time. The request must be in writing and demonstrate good cause as to why an extension should be granted. Please be advised that not all requests are granted.

After the response period has elapsed, cases are prioritized and maintained in CELA. Cases warranting the use of Commission resources are assigned as staff becomes available. Cases not warranting the use of Commission resources are dismissed.

If a case is assigned to a staff person, the Office of the General Counsel shall report to the Commission, making recommendations based upon a preliminary legal and factual analysis of the complaint and any submission made by the respondent. The report may recommend that the Commission: (a) find reason to believe that the complaint sets forth a possible violation of the Federal Election Campaign Act of 1971, as amended, (hereinafter the "Act"); or (b) find no reason to believe that the complaint sets forth a possible violation of the Act and, accordingly, close the file.

If, by an affirmative vote of four Commissioners, the Commission determines that there is reason to believe that a respondent has committed or is about to commit a violation of the Act, the Office of the General Counsel shall open an investigation into the matter. During the investigation, the Commission has the power to subpoena documents, to subpoena individuals to appear for deposition, and to order written answers to interrogatories. A respondent may be contacted more than once by the Commission during this phase.

If during this period of investigation, a respondent indicates a desire to enter into conciliation, the Office of the General Counsel may recommend that the Commission enter into conciliation prior to a finding of probable cause to believe that a violation has been committed. Conciliation is an attempt to correct or prevent a violation of the Act by informal methods of conference and persuasion. Most often, the result of conciliation is an agreement signed by the Commission and the respondent. The Conciliation Agreement must be adopted by four votes of