

# PERKINS COIE

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August 4, 2016

Marc Erik Elias  
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## VIA HAND DELIVERY

Jeff S. Jordan  
Assistant General Counsel  
Office of Complaints Examination  
and Legal Administration  
Attn: Donna Rawls, Paralegal  
Federal Election Commission  
999 E Street, N.W.  
Washington, DC 20463

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
2016 AUG -4 PM 1:19

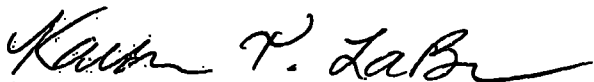
Re: MUR 7101

Dear Mr. Jordan:

We write as counsel to Senate Majority PAC and House Majority PAC along with Rebecca Lambe and Alixandria Lapp, the organizations' Treasurers, and James H. Simons, Bernard L. Schwartz, and Fred Eychaner (collectively, "Respondents"), regarding the complaint in MUR 7101. A designation of counsel form for the Respondents is attached to this letter. The complaint was received on July 20, 2016, and a response is due on August 4, 2016. Respondents respectfully request that the time for their response be extended for 30 days. Respondents require more time to review the complaint and develop the information necessary for a response. We appreciate the Commission's consideration of this request.

Please do not hesitate to contact Mr. Reese at 202-434-1616 if you have any questions regarding this matter.

Very truly yours,



Marc E. Elias  
Ezra W. Reese  
Katherine T. LaBeau

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2016 AUG -4 PM 3:09  
OFFICE OF GENERAL  
COUNSEL

Enclosures

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**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 #** 7101

**NAME OF COUNSEL:** Marc E. Elias, Ezra W. Reese & Katherine T. LaBeau

**FIRM:** Perkins Coie LLP

**ADDRESS:** 700 13th Street NW, Suite 600, Washington, DC 20005

**TELEPHONE- OFFICE** (202 ) 654-6200

**FAX** (202 ) 654-6211 **Web Address:** www.perkinscoie.com

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.

7/22/16  
**Date**

[Signature]  
**Respondent/Agent-Signature**

N/A  
**Title (Treasurer/Candidate/Owner)**

**RESPONDENT:** James H. Simons  
 (Committee Name, Company Name, or Individual Named in Notification Letter)

**MAILING ADDRESS:** Euclidean Capital, 160 Fifth Avenue,  
 (Please Print) 9<sup>th</sup> floor, New York, NY 10010

**TELEPHONE- HOME:**

**BUSINESS** (212) 537-0311

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

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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 # 7101

NAME OF COUNSEL: EZRA REESE, KATHERINE LABEON, MARC ELIAS

FIRM: PERKINS WIE

ADDRESS: 700 13TH STREET, NW, SUITE 600  
WASHINGTON, D.C. 20005

TELEPHONE- OFFICE (202) 434-1616

FAX (202) 434-1690 Web Address WWW.EREESE@PERKINSWIE.COM

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.

8/4/2016  
Date

CHARLES GROSS  
Respondent/Agent -Signature

ADVISOR TO FRED EYCHNER  
Title (Treasurer/Candidate/Owner)

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

MAILING ADDRESS: 2401 N. HALSTED STREET, SUITE 200  
(Please Print)

CHICAGO IL 60614

TELEPHONE (H) \_\_\_\_\_ (W) 713-975-0401

E-Mail: C.GROSS@NEWSWEB.COM

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

NONCONFIDENTIAL



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 # 7101

NAME OF COUNSEL: Marc E. Elias, Ezra W. Reese & Katherine T. LaBera

FIRM: Perkins Coie LLP

ADDRESS: 700 13th Street NW Suite 600, Washington DC 20005

TELEPHONE- OFFICE ( 202 ) 654-6200

FAX ( 202 ) 654-6211 Web Address www.perkinscoie.com

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.

3/2/10  
Date

[Signature]  
Respondent/Agent - Signature

Treasurer  
Title (Treasurer/Candidate/Owner)

RESPONDENT: House Majority PAC and Alexandria Lapp  
 (Committee Name, Company Name, or Individual Named in Notification Letter)

MAILING ADDRESS: 700 13th Street NW Suite 600, Washington DC 20005  
 (Please Print)

TELEPHONE-HOME (    )   

BUSINESS ( 202 ) 654-6200

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

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

STATEMENT OF DESIGNATION OF COUNSEL  
 Please use one form for each Respondent Entity/Transaction.  
 FAX (202) 219-9923

MUR # 7101

NAME OF COUNSEL: Mauro IL Hill, Sara W, Bruce & Katherine K. Lubera

FIRM: Perkins Coie LLP

ADDRESS: 700 15th Street NW, Suite 600, Washington DC 20005

TELEPHONE OFFICE (202) 654-6200

FAX (202) 654-6211 Web Address www.perkinscoie.com

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.

7/3  
Date

[Signature]  
Respondent/Agent - Signature

Treasurer  
Title (Treasurer/Candidate/Owner)

RESPONDENT: Senate Majority PAC and Rebecca Lantieri  
 (Committee Name, Company Name, or Individual Named in Notification Letter)

MAILING ADDRESS: 700 15th Street NW, Suite 600, Washington DC 20005  
 (Please Print)

TELEPHONE HOME ( ) ( )

BUSINESS (202) 654-6200

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. § 4370(a)(7)(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.

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