

MUR # 7102

July 5, 2017

Federal Election Commission
Office of Complaints Examination
& Legal Administration
ATTN: Mary Beth deBeau, Paralegal
999 E Street, NW
Washington, DC 20436

RE: Complaint Against Charles John "C.J." Baricevic, Jr.; Friends of CJ for Congress;
Ann M. Barnum; Keefe, Keefe & Unsell, P.C.; Thomas Q. Keefe, Jr., Esq.; Thomas
Q. Keefe, III, Esq.; and Samantha S. Unsell, Esq.

Dear Ms. deBeau:

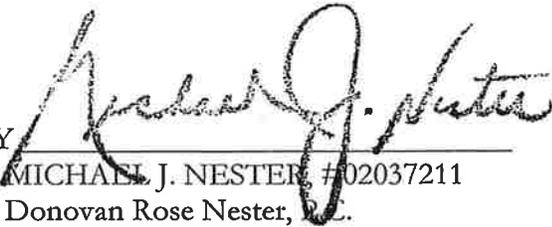
REPLY TO COMPLAINT

Comes now Charles John "C.J." Baricevic, Jr., by his attorneys, Donovan Rose Nester, P.C.,
and for his Reply to the Complaint, states as follows:

1. Charles John "C.J." Baricevic, Jr. does not know of any impropriety in regard to the
solicitation, reimbursement, or contribution as alleged in the above-styled Complaint. Furthermore,
Charles John "C.J." Baricevic, Jr. denies that he had knowledge of receiving contributions that were
unlawful.

CONCLUSION

WHEREFORE, based upon the foregoing analysis, Charles John "C.J." Baricevic, Jr.
respectfully moves for dismissal of the Complaint with prejudice and that the Federal Election
Commission deny the request for penalties, including disgorgement of any allegedly illegal and
unlawful contribution.

BY 

MICHAEL J. NESTER, #02037211

Donovan Rose Nester, D.C.

201 South Illinois Street

Belleville, Illinois 62220

mvester@drnpc.com

(618) 212-6500

ATTORNEY FOR CHARLES JOHN
"C.J." BARICEVIC, JR.

PROOF OF SERVICE

The undersigned certifies that a copy of the foregoing instrument was served upon the attorneys of record of all parties to the above styled case by enclosing same in an envelope addressed to such attorneys at their business address as disclosed by the pleadings of record herein, with postage duly prepaid and by depositing said envelopes in a U.S. Post Office Mail Box in Belleville, Illinois, on the 5th day of July, 2017.



Andrew J. Butler

Copies Forwarded To:

Mr. Jeff S. Jordan
Assistant General Counsel
Complaints Examination & Legal
Administration
Federal Election Commission
ATTN: Mary Beth deBeau, Paralegal
999 E Street, NW
Washington, DC 20436