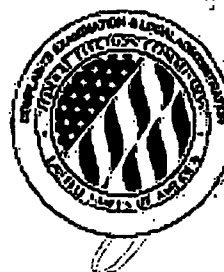


KAUFMAN LEGAL GROUP
A PROFESSIONAL CORPORATION



Digitally signed
by Donna
Rawls
Date:
2016.10.31
08:23:20 -04'00'

October 28, 2016

VIA U.S. MAIL AND E-MAIL

Jeff S. Jordan
Office of General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

Direct (213) 452-6550

Re: **FEC MUR 7131**
Our File No.: SVC3435.001

Dear Mr. Jordan:

We are writing in response to the complaint filed by Brian Griset on August 22, 2016 ("the Complaint"), in MUR 7131.

Introduction

The Complaint names Congresswoman Carol Shea-Porter, Susan Mayer, Senior Votes Count, and others, including Kaufman Legal Group, alleging violations of, among other provisions, 11 C.F.R. Sections 109.21 and 104.3. Kaufman Legal Group ("KLG") is a political law firm that provides legal and compliance services to hundreds of candidates, PACs and political organizations at the federal, state and local levels. The Complaint as it relates to KLG insinuates that KLG conspired with its client, Senior Votes Count, to further violations of the Federal Election Campaign Act of 1971, as amended ("the Act"), but does not provide any factual or legal basis for those assertions. In short, the allegations are simply absurd, and there is no reason to believe that KLG had any role in facilitating alleged violations of the Act. Therefore, the Commission should dismiss the complaint with respect to Kaufman Legal Group.

Analysis

The Complaint presents no facts to support the allegation that Kaufman Legal Group violated the Act or Commission regulations. First, the late reporting of the independent expenditure has already been addressed in Senior Votes Count's response to the Commission's request for additional information dated January 5, 2015. (See <http://docquery.fec.gov/pdf/751/15950604751/15950604751.pdf>.) As stated in that response, Senior Votes Count filed a 24-hour report disclosing the radio advertisement immediately upon becoming aware that a 24-hour report previously had not been filed. Thus, any suggestion that

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that KLG or Senior Votes Count intentionally delayed in disclosing the radio advertisement is totally lacking in merit.

Second, the Complaint alleges that Senior Votes Count (and, by implication, KLG) falsified donor information contained in Senior Votes Count's campaign filings presumably to "cover-up" the coordination that was allegedly taking place. Senior Votes Count received a contribution from Susan Mayer. She made her contribution through Act Blue, which provided her occupation information to Senior Votes Count as "Not Employed" and listed her employer as "None." A printout of the donor information from Act Blue received by KLG on behalf of Senior Votes Count listing her occupation/employer as "not employed" and "none" is attached for your reference. Thus, Senior Votes Count accurately reported the donor's information exactly as it was received from Act Blue, the intermediary in the transaction. Why the donor information was provided to KLG and Senior Votes Count in that form is beyond the knowledge of KLG and Senior Votes Count.

Finally, the Complaint includes an absurd allegation that KLG has not required payment of its legal fees with knowledge that Senior Votes Count is "expending funds for election purposes that exceed their debts," and suggests that KLG is "providing in kind donations to political candidates without reporting these contributions." These allegations are ridiculous and simply baseless. KLG's client, Senior Votes Count, is a volunteer organization that has raised a modest amount of money to promote its cause. That Senior Votes Count has not been able to settle its debts to KLG due to limited fundraising raises no possible violation of the Act, and KLG has not made any business decision to forgive the debts owed by Senior Votes Count.

Conclusion

For the reasons described herein, the allegations of the Complaint against Kaufman Legal Group are meritless, and the Complaint does not contain any factual or legal basis for asserting a violation of the Act by Kaufman Legal Group. Therefore, we respectfully request that the Commission close this matter with respect to Kaufman Legal Group, and take no further action against our firm.

Very truly yours,



Stephen J. Kaufman

SJK:sjs

Enclosures

cc: Donna Rawls (via U.S. Mail and E-mail)

Blue[™]

Contribution Details

[Back to contribution summary \(/entity/report/37335\)](#)

Susan Mayer

\$3,110.00

29 October, 2014 at 04:17 PM

Billing Address

20 Sawyer Rd
Lee, NH 03861

Contact Info

Occupation / Employer

not employed
none

Contribution Info:

Order Number: AB15265711

20 Sawyer Rd
Lee, NH 03861
United States