

LAW OFFICES

**TRISTER, ROSS, SCHADLER & GOLD, PLLC**

1666 CONNECTICUT AVENUE, N.W., FIFTH FLOOR

WASHINGTON, D.C. 20009

PHONE: (202) 328-1666

FAX: (202) 204-5946

www.tristerross.com

MICHAEL B. TRISTER  
GAIL E. ROSS  
B. HOLLY SCHADLER  
LAURENCE E. GOLD  
ALLEN H. MATTISON†  
†ALSO ADMITTED IN MARYLAND

KAREN A. POST  
Senior Counsel

NEIL C. WEARE  
JOSEPH W. STEINBERG‡  
‡ONLY ADMITTED IN MINNESOTA

DAVID M. WACHTEL\*  
Of Counsel  
\*ALSO ADMITTED IN  
CALIFORNIA AND MARYLAND

Montana Office  
LAURA L. HOEHN\*  
Of Counsel  
\*ALSO ADMITTED IN CALIFORNIA

October 13, 2016

*By email and first-class mail*

Jeff S. Jordan  
Assistant General Counsel  
Complaints Examination & Legal Administration  
Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
2016 OCT 17 AM 10:37  
OFFICE OF GENERAL  
COUNSEL

**Re: MUR 7137  
Laborers' International Union of  
North America PAC**

Dear Mr. Jordan:

On behalf of respondents Laborers' International Union of North America (LIUNA) PAC and Armand E. Sabatoni, in his official capacity as Treasurer ("Respondents"), I request a 30-day enlargement of time from October 15 to November 15 to respond to the complaint, for the following reasons.

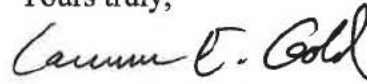
The complaint alleges a series of events taking place at and around Illinois and Iowa involving an employer of members of LIUNA PAC's connected organization, LIUNA, and a LIUNA affiliate, Local 538. Although none of the allegations refer to LIUNA PAC or LIUNA, it is necessary that we determine the underlying facts and their relevance, if any, to Respondents. That effort is underway, but we do not expect to be able to complete it by October 15, the date that is 15 days after LIUNA PAC's receipt of the complaint.

Meanwhile, undersigned counsel is occupied with other litigation and matters, including several that are before the Commission, as well as with an extensive daily docket of matters that pertain to the current national election. Many representatives of LIUNA and LIUNA PAC are also deeply engaged in election-related activities, and will continue to be until November 8.

The brief requested enlargement of time will have no practical bearing on the operation of the statute of limitations in this matter, as the complaint alleges events occurring very recently, since June 2016.

Accordingly, Respondents respectfully request that this brief enlargement of time to respond be granted. Thank you for your consideration.

Yours truly,

A handwritten signature in black ink, appearing to read "Laurence E. Gold". The signature is written in a cursive style with a large, prominent initial "L".

Laurence E. Gold  
Counsel for Respondents

cc: Armand E. Sabatoni, Treasurer