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November 8, 2016

By email to CELA@sec.gov

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

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

CELA
2016 NOV -9 PM 7:29
FEB 11 2017

Dear Mr. Jordan:

I am writing on behalf of respondents Laborers' International Union of North America PAC and Armand E. Sabitoni, as Treasurer (together, "LIUNA PAC") in response to the complaint ("Complaint"). The Federal Election Commission ("FEC" or "Commission") should find no reason to believe that LIUNA PAC violated the Federal Election Campaign Act ("the Act").

The Complaint makes no allegation of fact concerning either LIUNA PAC or its connected organization, the Laborers' International Union of North America ("LIUNA"); in fact, the Complaint refers to neither entity by name, position, relationship or function. The Complaint identifies only other entities and individuals as respondents and in its narrative. It is instead the Commission that has named LIUNA PAC as a respondent, evidently assuming or guessing that the allegedly unlawful payroll-deducted contributions were made to LIUNA PAC.

That assumption or guess is incorrect as a factual matter: LIUNA PAC did not receive any of the contributions that complainant Terry Miles claims were unlawfully deducted, and no authorization form that was presented to Mr. Miles either identified LIUNA PAC or could result in contributions to LIUNA PAC. The payroll stub form that is attached to the Complaint does not list LIUNA PAC as a recipient of deductions; it lists ten recipients under the header "DEDUCTIONS/BENEFITS" in the "DESCRIPTION" column, and none of the ten, including "FEDERAL/LPL," refers to LIUNA PAC or prompts deductions that are sent to LIUNA PAC.

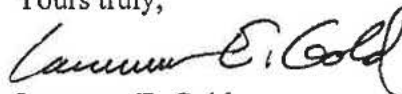


We request that the Commission neither assume nor guess that LIUNA PAC is involved in a particular enforcement matter merely because an individual complainant is a LIUNA member or LIUNA-represented employee and his or her complaint pertains to contributions to a LIUNA-affiliated political committee, unless the individual presents information that suggests either that LIUNA PAC was the recipient of contributions or that LIUNA or LIUNA PAC was otherwise involved in the acts complained of. Neither circumstance is present here. We refer the Commission to LIUNA PAC's Form 1, Statement of Organization, which includes an extensive list of its affiliated committees.

Accordingly, LIUNA PAC respectfully requests that the Commission decline to find reason to believe that LIUNA PAC violated the Act, and that the Commission dismiss the Complaint as to LIUNA PAC.

Thank you for your consideration.

Yours truly,



Laurence E. Gold

Counsel for Respondent
Laborers' International Union of
North America PAC and
Armand E. Sabitoni, as Treasurer

cc: Armand E. Sabitoni, Treasurer