

FEDERAL ELECTION COMMISSION

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CELA

November 16, 2016

Via Email CELA@fec.gov

Federal Election Commission
Office of Complaints Examination
And Legal Administration
Attn: Mary Beth deBeau, Paralegal
999 E Street, NW
Washington, DC 20463

Re: MUR 7148

Ms. DeBeau:

As counsel for Liberty Principles PAC, Inc., I hereby respond to the Complaint filed in the above designated MUR. As demonstrated below, the Complaint is erroneous in its conclusions, and therefore, can be quickly dismissed.

In the Complaint, Complainant Kim Savage makes speculative assertions and unsupported allegations. In addition, some of Ms. Savage's allegations are based upon false hearsay contained in newspaper articles.

Citing "publicly available news reports," the Complaint alleges that Liberty Principles PAC distributed publications supporting Tonia Khouri's Congressional campaign to voters throughout the State of Illinois and that these publications constituted coordinated expenditures. Had Ms. Savage visited the website of some of the regional newspapers, she could have determined the publisher of the articles cited in her complaint, rather than relying upon outdated and erroneous news articles.

As clearly refuted in the attached Declaration of Daniel Proft, treasurer of Liberty Principles PAC, the printed publications cited in the complaint were not distributed or paid for by the federal account of Liberty Principles PAC. See Declaration at ¶¶ 3 and 4. Further, there is no reason to examine any other

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publications Ms. Savage might subsequently cite. The federal account of Liberty Principles PAC has not distributed or paid for *any* publications relating to the federal 2016 primary or general elections.

Having shown above that the publications which are the subject of Ms. Savage's complaint were not paid for nor distributed by Liberty Principles PAC, there is no need to address the rest of Ms. Savage's arguments. As a result, Liberty Principles PAC respectfully requests that the Complaint be dismissed. If you have any questions, please do not hesitate to contact me.

Very truly yours,



Heidi K. Abegg

1-800-744-0001

DECLARATION OF DANIEL PROFT

State of Illinois

Being first duly sworn, Daniel Proft states as follows:

1. I am the president and treasurer of Liberty Principles PAC, Inc. and have knowledge of the operations of this organization.
2. I am familiar with the printed publications that are the subject of Ms. Savage's Complaint.
3. Liberty Principles PAC, Inc. did not distribute nor pay for the production or distribution of any of the publications at issue in Ms. Savage's FEC complaint, including publications regarding Tonia Khouri's congressional campaign.
4. The federal account of Liberty Principles PAC, Inc. has not distributed nor paid for the production or distribution of any publications relating to the federal 2016 primary or general election.

I certify under penalty of perjury that the foregoing is true and correct.

DATED this 15th day of November, 2016.



 Daniel Proft

Subscribed and sworn to before me this 15th day of November, 2016.



 Notary Public

My Commission expires:



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