



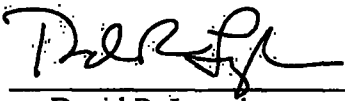
To be sure, the coordination regulations are very specific about the conduct that is required for a violation, and the allegations in the Complaint do not support or even suggest that such conduct occurred. Asking for campaign contributions (or assistance raising campaign contributions) is not prohibited under the conduct prong of 11 CFR §109.21. There is no allegation that the public communications at issue were made by WSO at the request or suggestion of the Blunt campaign, or after substantial discussions between the Blunt campaign and WSO, or with the material involvement of the Blunt campaign. Instead, the complaint audaciously asks the Commission to illogically conclude that, because Sen. Blunt (allegedly) called Mrs. Dannenfelsler "to raise money," and because WSO made independent expenditures, Sen. Blunt and WSO should be investigated to determine if they engaged in illegal coordination.

Candidates and their campaigns ask for money (and for help raising money) all the time. It is what they do. If the Commission were to investigate this Complaint, the precedent it would establish would be extraordinary, and would not be in keeping with the Commission's proper function of investigating and adjudicating legitimate complaints. First, it would mean that an unattributed statement in a media report is sufficient evidence to warrant a campaign finance investigation. Second, it would mean that any time a candidate asks for money—whether in a letter, at an event, or on a phone call (such as here)—from the leader of a political organization that eventually makes independent expenditures in support of that candidate (or in opposition to the candidate's opponent), there would be a presumption that illegal coordination took place or, at the very least, that there were other "backchannel communications" that the Commission should investigate. In short, it would establish precedent that no evidence of wrongdoing is needed, and would encourage the filing of frivolous, politically-motivated complaints like this one.

Based on the foregoing, SBA and WSO respectfully submit that the Commission should dismiss the complaint.

Sincerely,

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By:   
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Women Speak Out PAC, and Emily  
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