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CONFIDENTIAL
COMMUNICATION

VIA E-MAIL TO CELA@FEC.GOV

Federal Election Commission
Office of Complaints Examination & Legal Administration
Attn: Christal Dennis, Paralegal
1050 First Street, N.E.
Washington, DC 20463

Dear Office of Complaints Examination & Legal Administration:

Enclosed please find a collective response to the Complaints in the above-captioned MURs on behalf of Donald J. Trump for President, Inc. and Treasurer Bradley T. Crate.

Very truly yours,

/s/ E. Stewart Crosland

E. Stewart Crosland

Enclosure

BEFORE THE FEDERAL ELECTION COMMISSION

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**RESPONSE OF DONALD J. TRUMP FOR PRESIDENT, INC. AND
TREASURER BRADLEY T. CRATE TO THE COMPLAINTS**

The Complaints against Donald J. Trump for President, Inc. and Treasurer Bradley T. Crate (collectively, the “Campaign”) in the above-referenced MURs do not recite any facts that constitute a violation of federal campaign finance law and must be dismissed as to the Campaign.¹

The allegations in these MURs already have been thoroughly, and publicly, reviewed by the Department of Justice and both houses of Congress. None of them found any reason to conclude there had been a violation of federal campaign finance law—because there is none.

Indeed, the Complaints do not cite a single judicial or FEC precedent that supports their overly broad theory of what constitutes a “solicitation” of a “thing of value.” To the contrary, the legal and constitutional viability of such claims was directly called into doubt by Special Counsel Robert Mueller in his *Report on the Investigation Into Russian Interference In The 2016*

¹ The Campaign submits this collective response to all three Complaints in the above-referenced MURs because they appear to raise common questions of law and fact.

Presidential Election. See Robert S. Mueller III, Report on the Investigation Into Russian Interference In The 2016 Presidential Election Vol. I at 187.

Simply put, there is no basis for the Commission to find reason to believe that the Complaints in these MURs describe any violation of federal campaign finance law, and these matters should be dismissed as to the Campaign.