IN AND BEFORE THE

FEDERAL ELECTION COMMISSION

In re: Montana Republican State Central Committee Mike Hopkins, Treasurer, in his official capacity Respondent

MUR 7249

RESPONSE AND OBJECTIONS TO COMPLAINT; MOTION TO DISMISS AND MOTION FOR ATTORNEYS FEES AND COSTS

The Montana Republican State Central Committee through its treasurer, Mike Hopkins, in his official capacity (collectively hereafter "the Respondent"), files this Response and Objection(s) to the Complaint filed with the Federal Election Commission ("Commission" or "FEC") by End Citizens United. The Complaint alleges that Respondent committed a violation of the Federal Election Campaign Laws, Title 52 United States Code, Subtitle III, Chapter 301, Subchapter I ("the Act") and the regulations promulgated thereunder by the Commission.

Respondent affirmatively states that there has been no violation of the Act and the Complaint should be dismissed and, because this complaint is so patently absurd on its face, Respondent should be awarded its costs and attorneys' fees incurred in responding to this farcical complaint.

Allegations of and Responses to the Complaint

The complaint attacks the Gianforte Victory Fund, a joint fundraising committee whose participants include Greg for Montana (the candidate committee), the Montana Republican State Central Committee ("Montana GOP") and the National Republican Congressional Committee ("NRCC"), ("collectively, "the JFC"). The JFC filed its Statement of Organization on March 20, 2017, which indicates exactly what the entity is: a joint fundraising committee, clearly established to support the candidacy of Greg Gianforte in the Montana special election in May, 2017.

The Montana GOP hereby adopts by reference and incorporates in its entirety the response to the Complaint filed by other Respondents in this matter.

No violation has been committed and the Montana GOP has complied at all times with the regulations governing joint fundraising committees.

This MUR must be dismissed.

Respectfully Submitted,

Cleta Mitchell, on behalf of Respondent Montana Republican State Central Committee and

Cleta Frutchell

Mike Hopkins, Treasurer

FOLEY & LARDNER LLP 3000 K Street NW #600 Washington, DC 20007 cmitchell@foley.com (202) 295-4081 (direct)

September 30, 2018