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June 14, 2019

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**BY HAND DELIVERY**

Kimberly D. Hart, Esq.  
Attorney  
Office of General Counsel  
Federal Election Commission  
1050 First Street, N.E.  
Washington, D.C. 20463

**Re: MUR 7284**

Dear Ms. Hart:

We write as counsel to American Bridge 21st Century and Rodell Mollineau in his official capacity as treasurer (“American Bridge PAC”) and Correct the Record PAC (“CTR PAC”) and Elizabeth Cohen in her official capacity as treasurer (collectively, “Respondents”) regarding MUR 7284. On April 23, 2019, the Federal Election Commission (the “Commission”) found reason to believe Respondents violated 52 U.S.C. § 30104(b) by filing reports that lacked sufficiently itemized or detailed descriptions of certain contributions, expenditures, and what the Commission characterized as “advances.” The transactions at issue related to reconciliation payments between American Bridge 21st Century Foundation (“American Bridge Foundation”), American Bridge PAC, and CTR PAC, which are related entities. The Commission also opened an investigation of the alleged reporting violations, issuing Respondents a list of questions.

Respondents searched their files and communications and discovered the following item relevant to the Commission’s records request:

- A \$150,000 invoice from Ready PAC to American Bridge Foundation for Ready PAC’s email list.

According to Ready PAC’s reports, American Bridge Foundation paid the invoice on May 6, 2015.<sup>1</sup> We understand that American Bridge Foundation, through its project Correct the Record, negotiated with Ready PAC to determine the fair market value of the list.<sup>2</sup> The parties based the valuation on prevailing industry standards related to the number of names on the list,

<sup>1</sup> Ready PAC, 2015 Mid-Year Report at 23 (July 31, 2015).

<sup>2</sup> At that time, Correct the Record was a project of American Bridge Foundation. Correct the Record did not become a separate entity or a political committee until June 2015. *See* Correct the Record, Statement of Organization (June 5, 2015).

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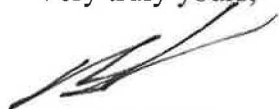
and the equipment and services Ready PAC would be providing to facilitate use of the list. American Bridge Foundation then passed on the cost of the list and related services to American Bridge PAC, which in turn passed the same expenses on to CTR PAC.

We were unable to locate any relevant records or communications providing further information on the list valuation or the goods and services that may have been included in the reported transfers between American Bridge Foundation, American Bridge PAC, and CTR PAC. The transactions discussed in the Commission's Factual & Legal Analysis occurred over three years ago, and the personnel involved in the transactions are no longer employed at the Respondent organizations. Indeed, Respondents did not even receive the complaint until years after the timeframe relevant to the Commission's findings.

The valuation of the list is clear from Ready PAC's reports and from the attached invoice. Furthermore, Respondents reported the list transfer and all of their other reconciliation payments. Both Respondents are legally allowed to accept unlimited contributions from other political committees, so there is no risk that any of these payments were prohibited or excessive contributions.

At its core, the Commission's inquiry in this matter concerns reported transactions to and from organizations that are able to accept unlimited contributions. Respondents are now producing all relevant information in their possession about these transactions, following a good faith search of their communications and records from years past. Should the Commission have further questions about this matter, please do not hesitate to contact the undersigned.

Very truly yours,



Marc E. Elias  
Ezra W. Reese  
Shanna M. Reulbach

Counsel to Respondents