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February 8, 2018

Via Electronic Mail <u>CELA@fec.gov</u>> Office of General Counsel Federal Election Commission Washington, D.C. 20463

RE: MUR 7300

Dear Sir/ Madame:

Our office represents Jeff Beals for Congress (hereinafter "Committee"), in reference to the above noted MUR number. Please accept this correspondence as a formal response to the complaint dated November 28, 2017, which was forwarded to our client by the Federal Elections Commission ("hereinafter "FEC"), by letter dated December 11, 2017.

It is respectfully submitted, that the Committee did not knowingly and intentionally violate of the Federal Election Campaign Act of 1971, as amended (hereinafter "The Act"). As the Commission is well aware, the timing of the filing of the financial disclosure form with the Clerk of the House of Representatives and the Candidate's loan to his campaign were within approximately two (2) weeks of each other. The Candidate always intended to loan his campaign the \$56,000.00 referred to in the Complaint and believed that acknowledging assets that would no longer be in his possession and were intended for filings with the Federal Election Commission was contrary to the open and transparent nature of the filing requirements.

If necessary, the Candidate is willing to amend his filing with the Clerk of the House to reflect the \$56,000.00 in assets on June 19, 2017 that were no longer available to the candidate on July 5, 2017, as reflected on his required filings with the FEC. However, it is important to note, that the filings with the Clerk of the House of Representatives and FEC properly reflect the current status of the Candidate and the Committee's financial position.

While the Candidate is more than willing to amend his financial disclosure with the Clerk of the House, it is important to note that the FEC requirements have been completely complied with in all respects and the dollar value is deminmius. Additionally, the alleged violation is insignificant as the filings accurately disclose the current financial position of the Candidate and Committee. As such, it is respectfully submitted that the Complaint does not merit further use of Commission resources.

Dr. Allen Beals February 6, 2018 Page 2 HARRIS BEACH & ATTORNEYS AT LAW

Accordingly, it is respectfully requested that the complaint be dismissed in its entirety. As always, our office is available to discuss this matter further or provide additional information for the Commissioner's to make their final determination.

We appreciate the FEC's attention to this matter.

Very truly yours,

Keith M. Corbett

cc: <u>Via Electronic Mail drawls@fec.gov</u>
Donna M. Rawls,
Paralegal Complaints Examination
and Legal Administration