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Digitally signed by
Kathryn Ross
Date: 2018.02.12
10:44:15 -05'00'

Stephen M. Ryan
Attorney at Law
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February 8, 2018

VIA E-MAIL

Federal Election Commission
Office of Complaints Examination
and Legal Administration
Attn: Christal Dennis, Paralegal
999 E Street, N.W.
Washington, D.C. 20463

HIGHLY CONFIDENTIAL

Re: MUR 7313

Dear Mr. Jordan:

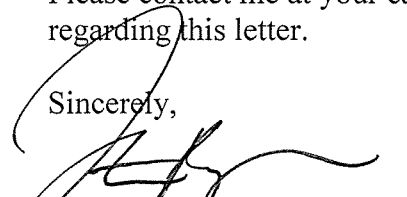
I am writing on behalf of my client, Michael D. Cohen, in response to your letter dated, January 30, 2018. Specifically, this letter responds to the complaint numbered MUR 7313, which was filed with the Federal Election Commission (FEC) by Common Cause and Paul S. Ryan.

In a private transaction in 2016, before the U.S. presidential election, Mr. Cohen used his own personal funds to facilitate a payment of \$130,000 to Ms. Stephanie Clifford. Neither the Trump Organization nor the Trump campaign was a party to the transaction with Ms. Clifford, and neither reimbursed Mr. Cohen for the payment directly or indirectly.

Contrary to the allegations in the complaint, which are entirely speculative, neither Mr. Cohen nor Essential Consultants LLC made any in-kind contributions to Donald J. Trump for President, Inc., or any other presidential campaign committee. Mr. Cohen has not been a government employee during any of the relevant time period. The payment in question does not constitute a campaign contribution or expenditure and, therefore, the FEC lacks jurisdiction over this matter. The complainants have not and cannot present any evidence to the contrary. Accordingly, the complaint should be dismissed.

Please contact me at your earliest convenience at (202) 756-8333 if you have any questions regarding this letter.

Sincerely,



Stephen M. Ryan
Counsel for Michael Cohen



FEDERAL ELECTION COMMISSION
999 E Street, NW
Washington, DC 20463

STATEMENT OF DESIGNATION OF COUNSEL

Provide one form for each Respondent/Witness

EMAIL cela@fec.gov

FAX 202-219-3923

MUR # 7313

Name of Counsel: Stephen M. Ryan

Firm: McDermott Will & Emery LLP

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Washington, D.C. 20001

Telephone: 202-756-8333 Fax: 202-756-8087

E-mail: sryan@mwe.com

The above-named individual and/or firm is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

2/12/18
Date

Signature (Respondent/Agent)

INDIVIDUAL
Title

RESPONDENT: Michael D. Cohen
(Committee Name/ Company Name/Individual Named in Notification Letter)

Mailing Address: 30 ROCKEFELLER PLAZA, 23RD FLOOR
(Please Print) NEW YORK, NEW YORK 10112

Telephone (H): _____ (W): (212) 872-9849

E-mail: _____

This form relates to a Federal Election Commission matter that is subject to the confidentiality provisions of 52 U.S.C. § 30109(a)(12)(A). This section prohibits making public any notification or investigation conducted by the Federal Election Commission without the express written consent of the person under investigation.