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> Stephen M. Ryan Attorney at Law sryan@mwe.com +1 202 756 8333

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June 8, 2018

## VIA EMAIL TO CELA@fec.gov

## CONFIDENTIAL COMMUNICATION

Federal Election Commission Office of Complaints Examination and Legal Administration Attn: Kathryn Ross, Paralegal 999 E Street, N.W. Washington, DC 20463

Re: MURs 7324, 7364, and 7366

To the Office of Complaints Examination and Legal Administration:

On behalf of Respondent Michael D. Cohen, we respectfully submit the following response to the Complaints filed in the above-referenced matters under review. The Complaints allege violations of the Federal Election Campaign Act ("FECA") as a result of a media company's alleged business transactions and publishing decisions. The allegations are based on speculation from news stories and are not supported by the facts or the law, as the alleged business transactions and any publishing decisions described in the Complaints, even if true, were not subject to the FECA. Moreover, the allegations raised in the Complaints relating to Respondent's alleged conduct do not constitute violations of the FECA. Accordingly, Respondent respectfully requests that the Commission dismiss the Complaints and close the above-referenced matters.

Sincerely

Stephen M. Ryan

Counsel for Respondent Michael Cohen