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October 8, 2019

BY CERTIFIED MAIL AND E-MAIL (drigsby@fec.gov)

Mr. Delbert Rigsby
Federal Election Commission
1050 First Street, NE
Washington, DC 20463

Re: MUR 7337 (Conservative Leadership for Arizona)

Dear Mr. Rigsby,

On behalf of my client Conservative Leadership for Arizona (“CLA”), I write in response to the Commission’s reason-to-believe (“RTB”) finding in the above-referenced matter and your letter dated August 13, 2019.

CLA is a defunct committee which has no funds, as its latest filings with the Commission show. But for this ongoing enforcement matter, CLA would have terminated its registration with the Commission. CLA has no funds to pay attorneys fees for its legal defense and no staff. Its treasurer Tim Sifert, who is named as a respondent in this matter in his official capacity, also is no longer being paid by the committee. In light of these circumstances, obtaining responses to the Commission’s broad requests for written answers and production of documents would be difficult, to say the least.

Given its defunct status, CLA is prepared to engage in pre-probable cause conciliation to resolve this matter expeditiously and to avoid protracted discovery, further briefing, and litigation. This is notwithstanding CLA’s belief that it has strong legal arguments to contest the Commission’s RTB finding, as set forth in contentions in the enclosed proposed conciliation agreement.

Accordingly, CLA respectfully requests that its proposed conciliation agreement (enclosed) be presented to the Commission for its consideration.

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SECY REC'D BY FEDERAL COUNSEL

GENERAL COUNSEL

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Please do not hesitate to contact me should you have any questions about CLA's proposal or position.

Sincerely,



Eric Wang

enclosure