



From: Cavoli, James
To: [CELA](#)
Cc: [Fee, Adam](#); [Cavoli, James](#)
Subject: MURs 7350/7351
Date: Tuesday, April 24, 2018 6:02:06 PM
Attachments: [Statements.of.Designation.Counsel.4.24.18.pdf](#)

Dear Mr. Jordan,

Milbank, Tweed, Hadley & McCloy has been retained to represent **Cambridge Analytica** and **SCL Group Ltd.** in **MUR 7351** (complaint filed by Common Cause), and **Cambridge Analytica** in **MUR 7350** (complaint filed by J. Whitfield Larrabee and Resistance Committee Action Fund) (collectively, the “Complaints”).

We write to provide the requisite Statements of Designation of Counsel, which are attached to this email.

We also write to respectfully seek an adjournment of the date by which Cambridge Analytica and SCL Group must respond to the Complaints, which, we submit, is warranted for a host of reasons.

Milbank was just very recently retained with respect to the above FEC matters, which involve allegations that are the subject of much public attention, and date back several years in some instances. In addition, several of the allegations are based on press reports that purport to convey facts, but do so in blanket and conclusory fashion. It will take some time to gather and evaluate primary source materials that reflect accurate factual details, and to confer with individuals with personal knowledge of pertinent issues, facts and allegations (some of which may no longer be employed by Cambridge Analytica or SCL Group). These steps are necessary in order for our clients to craft and submit accurate and thoughtful responses to the Complaints, which they are entitled to do.

In addition, in late March 2018, the UK’s Information Commissioner’s Office raided and searched Cambridge Analytica’s facilities, and seized computers, servers, and paper files, among other things. These activities may also hamper our information gathering efforts, and thus our ability to respond. Certain aspects of the Complaints are also the focus of civil litigation in both federal and state courts (an action to consolidate multiple class action suits is pending), and investigations by various state attorneys general.

For these reasons, it is essentially impossible to properly respond to the Complaints without significant additional time. (As we calculate it, the current due date is April 28, 2018: 15 days from April 13, the date that the Complaints were received by our clients.) Accordingly, we respectfully request a return date of **June 15, 2018** to respond to the Complaints.

Respectfully submitted,

James Cavoli

James Cavoli | Milbank

Partner

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

STATEMENT OF DESIGNATION OF COUNSEL
 Please use ***one*** form for each Respondent/Entity/Treasurer
FAX (202) 219-3923

MUR # 7350

NAME OF COUNSEL: George S. Canellos, Esq.; James G. Cavoli, Esq.; Adam Fee, Esq.

FIRM: Milbank, Tweed, Hadley & McCloy LLP

ADDRESS: 28 Liberty Street, New York, NY 10005

TELEPHONE- OFFICE (212) 530-5000

FAX (212) 530-5219 **Web Address** www.milbank.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.

April 23, 2018

Head of Legal

Date

Respondent/Agent -Signature

Title(Treasurer/Candidate/Owner)

RESPONDENT: Cambridge Analytica
 (Committee Name, Company Name, or Individual Named in Notification Letter)

MAILING ADDRESS: Attn: Sean Richardson, Esq.
 (Please Print)

597 Fifth Avenue, 7th Floor, New York, NY 10017

TELEPHONE- HOME (_____) _____

BUSINESS (646) 891-4021

Information is being sought as part of an investigation being conducted by the Federal Election Commission and the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) apply. This section prohibits making public any investigation conducted by the Federal Election Commission without the express written consent of the person under investigation

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

STATEMENT OF DESIGNATION OF COUNSEL
Please use **one** form for each Respondent/Entity/Treasurer
FAX (202) 219-3923

MUR # 7351

NAME OF COUNSEL: George S. Canellos, Esq.; James G. Cavoli, Esq.; Adam Fee, Esq.

FIRM: Milbank, Tweed, Hadley & McCloy LLP

ADDRESS: 28 Liberty Street, New York, NY 10005

TELEPHONE- OFFICE (212) 530-5000

FAX (212) 530-5219

Web Address www.milbank.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.

April 23, 2018

Date

Respondent/Agent -Signature

Head of Legal

Title(Treasurer/Candidate/Owner)

RESPONDENT: SCL Group Limited

(Committee Name, Company Name, or Individual Named in Notification Letter)

MAILING ADDRESS: Attn: Sean Richardson, Esq.

(Please Print)

597 Fifth Avenue, 7th Floor, New York, NY 10017

TELEPHONE- HOME ()

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