

# McDermott Will&Emery

  
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 by Kathryn Ross  
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June 8, 2018

**VIA EMAIL TO CELA@fec.gov**

**CONFIDENTIAL COMMUNICATION**

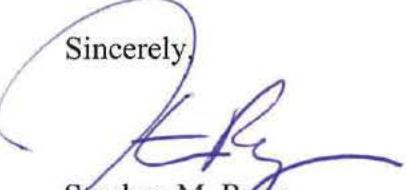
Federal Election Commission  
 Office of Complaints Examination and  
 Legal Administration  
 Attn: Kathryn Ross, Paralegal  
 999 E Street, N.W.  
 Washington, DC 20463

**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