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ROSENSTEIN & BIRKENSTOCK, P.C.

June 13, 2018

Mr. Jeff S. Jordan
Assistant General Counsel
Office of Complaints Examination
and Legal Administration
Federal Election Commission
1050 First Street, N.E.
Washington, D.C. 20463

Re: MUR 7368

Dear Mr. Jordan:

The undersigned serves as counsel for Doug Jones for Senate; James Douglas Turner, Jr., in his official capacity as Treasurer; Conor Lamb for Congress; and Marco Attisano, in his official capacity as Treasurer (the "Committees"). This letter responds on behalf of the Committees to the Commission's notification that it received a complaint (the "Complaint") alleging that the Committees violated the Federal Election Campaign Act (the "Act") and Federal Election Commission (the "Commission") regulations.

This matter was initiated by a Complaint filed by the Public Integrity Alliance against Postcards to Voters and Hiral for Congress, the principal campaign committee for Congressional candidate Hiral Tipirneni regarding, among other things, the alleged acceptance and failure to report excessive or prohibited in-kind contributions. Doug Jones for Senate and Conor Lamb for Congress are mentioned, in passing, in Footnote 5 of the Complaint. Other than this footnote, which contains no specific facts or allegations against the Committees, the Committees are not mentioned in the Complaint. To be sure, the Complaint fails to provide any facts to substantiate a violation by the Committees of any provision of the Act or Commission's regulations, nor does it provide the Committees an adequate opportunity to respond to any such allegations. The inclusion of the Committees in a catchall footnote is not enough to pursue a violation under the Act.¹

The Complaint contains no specific facts to support the allegation of any coordination by the Committees. The only possible evidence of coordination alleged in the Complaint is the unsubstantiated general assertions found in an FAQ section on Postcards to Voters' website regarding "talking points" used for the Postcards. Specifically, the Complaint alleges that the

¹ See, MUR 5952 (Hillary Clinton for President) where the Commission found no reason to believe a violation occurred when the Complaint failed to provide any specific allegations or factual information to support the alleged violation.

talking points used by Postcards to Voters are coordinated with Campaigns. Notwithstanding, the Committees categorically deny that they have coordinated the creation of any talking points with Postcards to Voters.

Without any specific allegations or facts supporting a violation of the Act, and the Committees categorical denial that any coordination occurred, the Commission should dismiss this Complaint as it relates to the Committees.

If you have any questions regarding this Response, my daytime number is (202) 479-1111. My email address is reiff@sandlerreiff.com.

Sincerely,

A handwritten signature in blue ink, appearing to read "Neil P. Reiff".

Neil P. Reiff
Counsel to Doug Jones for Senate
Douglas J. Turner, Jr., Treasurer
Conor Lamb for Congress
Marco Attisano, Treasurer