

# Levy | Firestone | Muse

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February 28, 2020

via Electronic Mail

Anne B. Robinson  
Federal Election Commission  
Washington, DC 20463  
[arobinson@fec.gov](mailto:arobinson@fec.gov)

Re: MURs 7291 and 7449

Dear Ms. Robinson:

Thank you for your December 30, 2019 letter.

The December 30, 2019 letter seeks materials from Fusion GPS related to its engagement with one of its clients, Perkins Coie LLP ("Perkins Coie"). Fusion GPS is strongly committed to honoring its client confidentiality obligations. Here, those obligations are heightened because of the nature of the engagement: Perkins Coie hired Fusion GPS to assist in Perkins Coie's provision of legal counsel to its clients, and the materials you have requested were created in furtherance of work performed at the direction of Perkins Coie in anticipation of litigation and for the purpose of providing Perkins Coie with information that was integral to Perkins Coie providing legal advice to its clients. As a result, Fusion GPS's work and communications related thereto implicate the attorney work product doctrine and the attorney-client privilege. Fusion GPS is still subject to its confidentiality obligations and does not have authority to waive any privileges.

In light of these considerations and the voluntary nature of your request, we ask that you direct this request to Perkins Coie as the more appropriate recipient. We are

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available to engage further with you in the future, when the Federal Election Commission has a quorum and can address these issues in the appropriate process.

Sincerely,

A handwritten signature in black ink, appearing to read "Joshua A. Levy". The signature is written in a cursive style with a large initial 'J' and a long, sweeping tail.

Joshua A. Levy  
Rachel M. Clattenburg  
*Counsel for Fusion GPS*