

Founded in 1852  
by Sidney Davy Miller



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January 12, 2023

**CONFIDENTIAL AND PROTECTED FROM DISCLOSURE UNDER THE FREEDOM  
OF INFORMATION ACT**

Aaron Rabinowitz  
Mark Shonkwiler  
Federal Election Commission  
999 E Street NW | Washington, D.C. 20463

Re: MUR 7464

Dear Messrs. Rabinowitz and Shonkwiler:

Please accept this letter in reference to Mr. Rabinowitz's email to me of January 6, 2023 requesting documents in connection with the Federal Election Commission's proceedings in MUR 7464. Pursuant to your request, Raymond McVeigh has conducted a reasonable search for the documents and communications in his possession, custody, or control that he used to prepare for his January 6, 2023 deposition in MUR 7464 or that otherwise relate to MUR 7464. Mr. McVeigh has specifically searched for communications with Brad Elgin, Tom Norris, or Joel Riter that relate to the subject matter of MUR 7464. Mr. McVeigh has also specifically searched for any communications with the following additional individuals and organizations that the Commission Staff has represented relate to the subject matter of MUR 7464: Lisa Lisker; Nick Everhart; Tod Bowen; Terry Donelon; Melissa McNulty; and "Ohio Works." Because Mr. McVeigh has conducted these searches in the tight timeframe requested, the Commission Staff has agreed that Mr. McVeigh need not submit a privilege log. The documents that Mr. McVeigh has found pursuant to the aforementioned searches are being produced via File Locker with this letter ("Submission").

Pursuant to your further request for any other contact information for Brad Elgin or Tom Norris that is in Mr. McVeigh's possession, Mr. McVeigh has only a phone number ((614)306-4690) and email address ([tom@clarkfork.us](mailto:tom@clarkfork.us)) for Mr. Norris. Mr. McVeigh has no contact information for Mr. Elgin.

Because "enforcement actions under 52 U.S.C. § 30109 are confidential by statute," this letter and Submission are per se confidential and not subject to disclosure under the Freedom of Information Act (5 U.S.C. § 552). 11 C.F.R. § 4.5(a)(4)(vi). Cf. 52 U.S.C. § 30109(12)(A).

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Should any person request an opportunity to inspect or copy this letter or Submission, Mr. McVeigh requests to be notified immediately of any such request and be furnished promptly with all written materials pertaining to such request. Mr. McVeigh further requests that he thereafter be notified promptly of any agency determinations with respect to such request and be given ten days' written notice prior to any intended release so that Mr. McVeigh may, if deemed necessary or appropriate, submit additional material substantiating his claim to confidentiality or take other appropriate action.

Finally, this letter and Submission are being provided to the Commission for the purpose of assisting it in the proceedings in MUR 7464. At the conclusion of the Commission's interest in this matter, Mr. McVeigh requests that the letter, Submission, and any related materials provided to the Commission, and any copies thereof, be returned to Mr. McVeigh.

Please note that submission of this letter and the accompanying Submission to the Commission is without prejudice to and with full reservation of all privileges, rights, and protections, including the attorney-client privilege and work-product protection, that may pertain to such documents in this investigation or in any enforcement action or other litigation.

Sincerely,

Miller, Canfield, Paddock and Stone, P.L.C.

By: 

Matthew P. Allen