



# UTRECHT, KLEINFELD, FIORI, PARTNERS

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December 17, 2018

Jeff S. Jordan

Office of the General Counsel

Federal Election Commission

999 E. Street, NW

Washington, DC 20436

***Re: Response to MUR 7527***

Dear Mr. Jordan:

This response is submitted on behalf of News for Democracy LLC, which received a copy of the complaint in the above referenced matter.

The complaint and press reports confuse News for Democracy LLC with News for Democracy 501(c)(4), which are separate and distinct legal entities. No funds from News for Democracy LLC were used to run any of the advertisements found in the complaint. Without any evidence other than admitted pure speculation, the complaint suggests that there could have been foreign money in News for Democracy LLC. In fact, there is no basis for that inaccurate assertion. However, as stated previously, no funds from News for Democracy LLC were used to place the advertisements found in the complaint.

The facts alleged in the complaint do not establish a violation of the Federal Election Campaign Act, as amended (“the Act”), or of its implementing regulations.<sup>1</sup> Federal Election Commission regulations require a complainant to provide “facts which describe a violation of a statute or regulation over which the Commission has jurisdiction.”<sup>2</sup> The facts put forth in the complaint do not describe any such violation.

For these reasons, the Commission should find no reason to believe that News for Democracy LLC violated the Act. If you have any questions, please do not hesitate to contact our office by email or by phone.

Sincerely,

Lyn Utrecht

Adam Clark

Counsel for News for Democracy LLC

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<sup>1</sup> 52 USC 30101, et seq.; 11 CFR 100, et seq.

<sup>2</sup> 11 CFR 111.4(d)(3)