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January 3, 2019

CONFIDENTIAL

Via Email (cela@fec.gov)

Jeff Jordan, Assistant General Counsel, CELA
Office of the General Counsel
Federal Election Commission
1050 First Street NE
Washington, DC 20463

Re: MUR 7557

Dear Mr. Jordan:

This letter is on behalf of this firm's client, Center for Voter Information (CVI), in response to the complaint filed in the above-captioned matter by Susan N. Willoughby. A *Statement of Designation of Counsel* form has been executed (attached).

The Commission should dismiss this complaint outright because there were no factual allegations set forth in the complaint purporting to demonstrate any improper or illegal activities by CVI. CVI is a nonprofit social welfare organization established under section 501(c)(4) of the Internal Revenue Code. More information on CVI can be found at: <https://www.centerforvoterinformation.org/>. Ms. Willoughby's complaint is premised on the mistaken assumption that a nonprofit organization cannot endorse a candidate. The mailing that is the subject of the complaint is a nonpartisan voter guide; however, even if it were interpreted as endorsing a candidate that is an allowable activity for a 501(c)(4) organization such as CVI.

Respectfully submitted,



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FEDERAL ELECTION COMMISSION
1050 First Street, NE
Washington, DC 20463

STATEMENT OF DESIGNATION OF COUNSEL

Provide one form for each Respondent/Witness

EMAIL cela@fec.gov

FAX 202-219-3923

AR/MUR/RR/P-MUR# 7557

Name of Counsel: Scott Thomas

Firm: Blank Rome LLP

Address: 1825 I Street NW
WDC 20006

Office#: 202-420-2601 Fax#: 202-379-9288

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The above-named individual and/or firm is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

1/3/2019 Page S Gardner President and CEO
Date (Signature - Respondent/Agent/Treasurer) Title
Page S Gardner
(Name -- Please Print)

RESPONDENT: Page S Gardner, President, Center for Voter Information
(Please print Committee Name/ Company Name/Individual Named in Notification Letter)

Mailing Address: 1707 L Street NW, Suite 300
(Please Print) WDC 20036

Office: 202-659-9570 Mobile#: _____

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This form relates to a Federal Election Commission matter that is subject to the confidentiality provisions of 52 U.S.C. § 30109(a)(12)(A). This section prohibits making public any notification or investigation conducted by the Federal Election Commission without the express written consent of the person under investigation.

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