

In re: September Group, LLC)
)
) MUR 7561

What are NOT true are the bizarre assertions by complainant that the payments to September Group were “potentially” paid to Rinat Akhivietshin and Ris “representatives” through “an apparent Russian shell group” which he identifies as September Group LLC. He then goes on to assert falsely and with reckless disregard for the truth that the payments were for social media (they were not) and that the payments “secured the services of @MihaiBasarab and Internet Research Agency, LLC employees.” That is also a lie. See Attachment A, the Affidavit of Chuck Warren, Managing Director of September Group, LLC.

The complaint refers to the legitimate payments from the Republican Party of Florida to September Group as “suspicious” and further references “canvassing” (the purpose of the payments included in the Republican Party of Florida’s reports to the FEC) in quotes, to discredit the true and legitimate purpose of the payments for the actual canvassing services in Florida that were developed, implemented and managed by September Group.

The complaint drags a well-respected, reputable political consulting firm that performed actual services important to the Republican victory in Florida in 2018 into what is nothing more than a bizarre collection of fanciful, concocted, false and defamatory lies stitched together by the complainant.

There is no merit whatsoever to the complaint and it must be dismissed.

LEGAL ANALYSIS

Because the complaint as related to the September Group contains nothing that is factual, accurate or true, there are no facts to be analyzed under the statutes, the Federal Election Commission regulations, advisory opinions or other legal guidance.

Simply put, the legal analysis is that September Group has not violated any law or regulation, and the case must be dismissed.

CONCLUSION

This is not a difficult case to examine. The allegations are preposterous and false. Justice requires that it be reviewed and dismissed immediately, and not three or four years from now. September Group LLC urges the prompt and expeditious dismissal of a completely spurious complaint.

Respectfully submitted,



Cleta Mitchell, Esq.
Foley & Lardner, LLP
3000 K Street, NW #600
Washington, DC 20007

Counsel for Respondent September Group, LLC

Submitted April 22, 2019

ATTACHMENT A

AFFIDAVIT OF CHUCK WARREN

State of Utah)
)
 Salt Lake County)

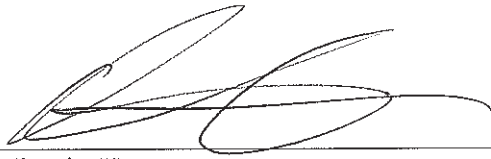
AFFIDAVIT OF CHUCK WARREN

I, Chuck Warren, of legal age, a United States citizen and a resident of the State of Utah, do hereby affirm and state as follows:

1. I am the Managing Director of September Group, LLC, ("September Group") which is domiciled in Wyoming as a limited liability company.
2. September Group is a political consulting firm that provides services to political campaigns, political parties, nonprofit organizations and others, on a 50-state basis, including but not limited to: policy analysis & message development, legislative & regulatory strategy, crisis management, coalition building & ally recruitment, legislative affairs management, grassroots targeted efforts, signature gathering for initiative and referenda petitions, legislative tracking and reporting, a full service call center, data collection, voter precinct organization, voter identification, robo-calls and scientific weighting, get out the vote, and door to door canvassing.
3. Complete information about September Group is available at <http://septembergroupllc.com>
4. In the 2018 election, September Group was retained by the Republican Party of Florida to develop, implement and manage door-to-door canvassing and voter turnout.
5. The principals of September Group are US citizens, the employees of September Group are US citizens, and there are no foreign entities or individuals involved or associated with September Group.
6. The allegation that September Group is a "Russian shell company" is false, defamatory, and completely untrue.
7. September Group received payments from the Republican Party of Florida and other clients for canvassing and other specific services related to the 2018 election in Florida, but was never paid, directly or indirectly, by or through any person or entity identified by the complainant in this MUR as somehow related to September Group.
8. The completely false and defamatory complaint references names I have never heard of, including but not limited to "RINAT AKHIVIETSHIN and RIS representatives".

9. There were no payments to September Group that flowed through "RINAT AKHIVIETSHIN and RIS representatives" or any other person(s) or entities.
10. I further do not know who @MihaiBasarab is nor do I know who Internet Research Agency LLC is and September Group has had no involvement with either.
11. September Group was retained by the Florida Republican Party for the purpose of canvassing voters and working on voter turnout in the 2018 election, and was not retained for purposes of a social media campaign.
12. It is outrageous that a reputable and reliable company such as September Group would be subjected to the false and defamatory assertions made by a complete stranger in the complaint in this MUR, a person who clearly knows nothing about my company, and that we would have to spend our resources and be forced to respond to these libelous, malicious, and false statements that utterly disregard the truth.

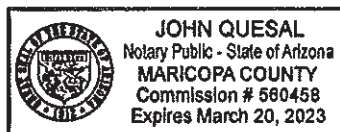
Further Affiant Sayeth Not.



 Chuck Warren

Before me this 19 day of April, 2019, personally appeared Chuck Warren, and swore under penalty of perjury that the above and foregoing statements are true and correct to the best of his knowledge and belief.

S E A L




 NOTARY PUBLIC

My Commission Expires: March 20 2023