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March 8, 2019

CONFIDENTIAL
COMMUNICATION

VIA E-MAIL TO CELA@FEC.GOV

Federal Election Commission
Attn: Christal Dennis
Office of Complaints Examination & Legal Administration
1050 First Street, N.E.
Washington, DC 20463

Re: Matter Under Review 7571

Dear Office of Complaints Examination & Legal Administration:

On behalf of Donald J. Trump for President, Inc. and Treasurer Bradley T. Crate,
enclosed is a response to the complaint in the above-captioned Matter Under Review.

Regards,



E. Stewart Crosland

Enclosure

BEFORE THE FEDERAL ELECTION COMMISSION

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) **MUR 7571**
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**RESPONSE OF DONALD J. TRUMP FOR PRESIDENT, INC. AND BRADLEY T.
CRATE, AS TREASURER, TO THE COMPLAINT**

By and through undersigned counsel, Donald J. Trump for President, Inc. and Treasurer Bradley T. Crate (collectively, “the Campaign”) respond to the Complaint in the above-captioned Matter Under Review, which the Commission should dismiss immediately.

The Complaint wrongly speculates that a payment the Campaign made in November 2018 to the Kasowitz Benson Torres LLP law firm for legal expenses may have been prohibited personal use of campaign funds. The payment in question was for legal costs incurred by the Campaign in connection with an employment matter and certain legal research done on the Campaign’s behalf – and had not nothing to do with the lawsuit speculatively described in the Complaint.¹ The expenses for which the payment went did not exist “irrespective of” campaign activities, and indeed had to be paid with campaign funds. *See* 52 U.S.C. § 30114(b)(2); 11 C.F.R. § 113.1(g); *see also* 52 U.S.C. § 30116.

¹ The Campaign takes no position on whether it could defray legal fees incurred in connection with that lawsuit.