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May 23, 2019 Hawaii Republican Party 725 Kapiolani Blvd. C-105 Honolulu, HI 96813

Via E-Mail Only: cela@fec.gov Jeff S. Jordan Federal Election Commission Washington, DC 20463

RE: Federal Elections Commission (FEC) MUR 7572 of May 7, 2019

This response is provided to address the most recent complainant amendment regarding MUR 7572. The previous responses remain valid. This response was coordinated with the Chairman. Shirlene Ostrov and the incoming Treasurer, Marilyn Moniz.

The most recent submission by Mr. Ryan regarding the Hawaii Republican Party (HRP) coordinated party expenditure for the Cavasso campaign shows his unwillingness to accept the party's use of that provision of campaign finance law. The e-mails provided as "evidence" validate the party's previous submission that Mr. Blom from the Cavasso campaign called the Party's attention to the coordinated party expenditures; that both he and the Party Chairman researched that provision with the FEC prior to executing the action; and that the HRP Chairman went a step further by contacting the HRP's campaign finance compliance trainer, Pam Smith, for added validation before proceeding with the transaction. The funds donated to the HRP could have been used in any way HRP deemed appropriate. The HRP chose to execute a coordinated party expenditure. If these funds were "earmarked" or HRP was a "conduit," the funds would have been transferred to the Cam Cavasso campaign.

The HRP continues to believe that the complainant's allegations are unfounded.

Sincerely,

Mary Amart

Mary Smart