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April 9, 2019

VIA OVERNIGHT MAIL

Mr. Jeff S. Jordan
Assistant General Counsel
Complaints Examination & Legal Administration
Federal Election Commission
1050 First Street NE
Washington, D.C. 20463

RE: MUR 7582

Dear Mr. Jordan:

I write on behalf of my clients Representative Barbara Lee, Barbara Lee for Congress, and Ms. Loraine Binion in her capacity as treasurer for Barbara Lee for Congress, in response to your March 21, 2019 letter regarding MUR 7582 and the FEC complaint filed by Mr. Craig Robinson on behalf of The Patriots Foundation. I request that the complaint be dismissed by your office without further investigation because there is no factual or legal basis to conclude that my clients violated the law.

The complaint alleges that Barbara Lee for Congress accepted prohibited corporate and foreign campaign contributions from "Candide, LLC" and/or "Aner Ben-Ami," and that the committee failed to disclose receipt of these contributions on its campaign reports. The sole basis that the complaint provides for this allegation is a section of Candide's website called "Political Donations," where Representative Lee is included in a list of five "political candidates and organizations supported" by Candide. The webpage does not indicate that Candide in fact made contributions to any of the supported candidates. Instead, there is a small disclaimer at the bottom of the webpage that provides: "Candide Group is not a grant-making organization and does not accept proposals, however we do make a small number of philanthropic and political contributions each year to holistically support the infrastructure needed for lasting change." The complaint contains no evidence whatsoever that Candide or Mr. Ben-Ami made political contributions to the supported candidates, including Representative Lee.

Barbara Lee for Congress did not disclose contributions received from Candide or Aner Ben-Ami for a very simple reason: The committee did not

OFFICE OF
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2019 APR 12 AM 11:40

receive contributions from either the entity or the individual. In fact, in reviewing the committee records in response to this complaint, the committee confirmed that it has never received a contribution from Candide, Aner Ben-Ami or any individual who has provided "Candidate" as his or her occupation or employer.

In sum, the allegations in the complaint against my clients have no basis in fact, and there was no violation of the law by my clients. For the foregoing reasons, I respectfully request that you dismiss the complaint.

Please do not hesitate to contact me if you have questions or require additional information. As noted in the attached Statements of Designation of Counsel, all future correspondence regarding this matter should be directed to me.

Very truly yours,

OLSON HAGEL & FISHBURN LLP



EMILY A. ANDREWS

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