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## VIA HAND DELIVERY AND EMAIL

April 22, 2019

Jeff S. Jordan, Assistant General Counsel  
Christal Dennis, Paralegal  
Federal Election Commission  
Office of Complaints Examination and Legal Administration  
1050 First Street, NE  
Washington, DC 20463  
Email: CELA@fec.gov

**Re: MUR 7588**

Dear Mr. Jordan:

We write as counsel to Lori Trahan for Congress Committee (the "Committee") and Martha Howe in her official capacity as treasurer of the Committee (collectively, "Respondents"), regarding the complaint in the above-referenced matter.

As you know, the Respondents also recently received a complaint, numbered MUR 7585, that asserts similar allegations against the Respondents. Given the significant similarities between these matters, we ask that the FEC consolidate these two matters and allow the Respondents to submit one response that responds to the consolidated matter in full.

In consolidating these matters, the FEC will conserve staff resources and will allow the Commission to consider all alleged activities at the same time. Moreover, the FEC commonly consolidates matters. Just to name a few, the FEC consolidated MURs 7169, 7170, 7171, 7172, 7173, 7174, 7175, 7176, 7177, 7178, 7179, 7182, 7187, and 7188 into one matter;<sup>1</sup> consolidated MURs 7199, 7219 and 7242 into one matter;<sup>2</sup> and consolidated MURs 7138 and 7229 into one matter.<sup>3</sup> Given these efficiencies and how commonly the FEC takes this approach, we hope the FEC will consider this approach in these two matters.

<sup>1</sup> See MURs 7169, 7170, 7171, 7172, 7173, 7174, 7175, 7176, 7177, 7178, 7179, 7182, 7187, and 7188 First General Counsel's Report (June 16, 2017), <https://www.fec.gov/files/legal/murs/7188/17044435358.pdf>.

<sup>2</sup> See MURs 7199, 7219 and 7242 First General Counsel's Report (Nov. 2, 2017), <https://www.fec.gov/files/legal/murs/7242/18044443132.pdf>.

<sup>3</sup> See MURs 7138 and 7229 First General Counsel's Report, (Aug. 14, 2017), <https://www.fec.gov/files/legal/murs/7229/19044456354.pdf>.

If the FEC agrees to consolidate the matters, we ask that we be allowed to respond to the consolidated matter on May 9, 2019, the current deadline for the Respondents' MUR 7585 response.

We appreciate the Commission's consideration of our requests. Please do not hesitate to contact us if you have any questions.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'Kate Sawyer Keane', with a long, sweeping horizontal line extending to the right.

Kate Sawyer Keane  
Jonathan S. Berkon  
Counsel to Respondents



**FEDERAL ELECTION COMMISSION**  
Washington, DC 20463

**Statement of Designation of Counsel**

Provide one form for each Respondent/Witness  
FAX 202-219-3923

**CASE:** MUR 7588

**Name of Counsel:** Kate Sawyer Keane and Jonathan S. Berkon

**Firm:** Perkins Coie LLP

**Address:** 700 13th Street NW, Washington, DC 20005

**Telephone:** ( 202 ) 654-6200 **Fax:** (        )

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.

4/18/19  
**Date**

[Signature]  
**Signature**

Treasurer  
**Title**

**RESPONDENT:** Lori Trahan for Congress Committee and Martha Howe, Treasurer  
(Committee Name/Company Name/Individual Named In Notification Letter)

**MAILING ADDRESS:**

Lori Trahan for Congress Committee and Martha Howe, Treasurer

PO Box 1161, Lowell, MA 01853

**Telephone:(H):** \_\_\_\_\_ **(W):** \_\_\_\_\_

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 receiving the notification or the person with respect to whom the investigation is made.

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