

DONALD C. BREY
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Digitally signed
by Kathryn Ross
Date: 2019.05.09
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May 6, 2019

SENT VIA E-MAIL: at cela@fec.gov

Federal Election Commission
Office of Complaints Examination & Legal Administration
Attn: Kathryn Ross, Paralegal
1050 First Street, NE
Washington, DC 20463

Re: MUR 7594

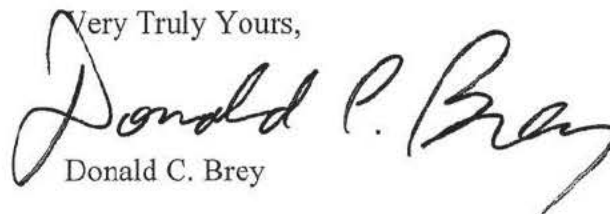
Dear Ms. Ross,

The allegations against Friends of Derek Merrin should be dismissed for the same reasons set forth in my attached letter to you of May 3, 2019.

The Statement of Designation of Counsel for Respondent Derek Merrin is attached.

Also attached is the Statement of Designation of Counsel for Respondent Ohio House Republican Organizational Committee (now known as HRCC). My May 3, 2019 letter responded on behalf of the Ohio House Republican Organizational Committee, but did not include its Designation of Counsel.

Very Truly Yours,



Donald C. Brey

DONALD C. BREY
614.334.6105
dbrey@taftlaw

May 3, 2019

SENT VIA E-MAIL: at cela@fec.gov

Federal Election Commission
Office of Complaints Examination & Legal Administration
Attn: Kathryn Ross, Paralegal
1050 First Street, NE
Washington, DC 20463

Re: MUR 7594

Dear Ms. Ross,

The allegations against the following Respondents should be dismissed because the Complaint is frivolous on its face.

- Ohio House Republican Organizational Committee,
- Committee for Wiggam,
- Romanchuk for State Representative,
- Cupp for State Representative Committee,
- Tim Ginter for State Representative,
- Friends of Dave Greenspan,
- Brinkman Campaign Committee,
- Citizens for Blessing,
- Seitz for Ohio Committee,
- Elect DeVitis,
- Oelslager for Ohio,
- Stein for State Representative,
- Committee to Elect Manning,
- Friends of Scott Lipps,
- The Committee to Elect Rick Carfagna,
- Hambley for House Committee,
- Darrell Kick for State Representative,
- Citizens for Scott Ryan,
- Friends of Larry Householder,

Federal Elections Commission

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- LaTourette for Ohio,
- Campaign to Elect James M. Hoops,
- Citizens to Elect Craig Riedel,
- Friends of Bill Reineke,
- Friends for Steve Arndt,
- Friends of Ryan Smith,
- Friends of Jay Edwards,
- Friends of Jonathan Dever, and
- Citizens for Rezabek

The Statements of Designation of Counsel for these Respondents are attached.

It was and is lawful for a corporate PAC/Separate Segregated Fund to make contributions to Respondents. While Mr. Austin acknowledges in his Complaint “I am not a lawyer nor have I consulted one in the drafting of this document”, no one should have to respond to a Complaint that on its face makes no allegation of any unlawful conduct.

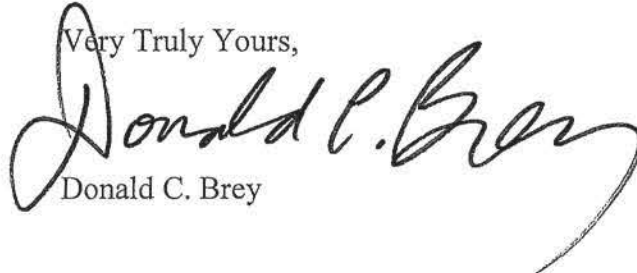
It is perfectly lawful for corporate sponsored PACs to make political contributions – whether or not the sponsoring corporation is the subsidiary of a foreign corporation. Yet, that lawful conduct is all that the Complaint alleges.

The Complaint repeatedly states that “the PAC made” the contributions at issue. See, Complaint at p. 6. There is no claim that the contributions were improperly reported, or were concealed, or were made by any entity other than the corporate PAC. Indeed, the Complaint claims no knowledge of the contributions apart from what was publicly reported on the Federal Elections Commission’s website.

Mr. Allen’s Complaint expresses gross ignorance of how campaign finance operates. Mr. Austin confuses the basic difference between a corporation and a corporate PAC. The Complaint makes no claim that Respondents received any corporate contribution from any corporation’s treasury funds, but merely alleges that Respondents received PAC contributions. There is no law against that.

WHEREFORE, the above listed Respondents respectfully submit that the Complaint against them should be dismissed.

Very Truly Yours,



Donald C. Brey



FEDERAL ELECTION COMMISSION
1050 First Street, NE
Washington, DC 20463

STATEMENT OF DESIGNATION OF COUNSEL

Provide one form for each Respondent/Witness

EMAIL: ceis@fec.gov

FAX 202-219-3923

AR/MUR/RR/P-MUR# 7594

Name of Counsel: DONALD C. BREY

Firm: TAFT STETTINIUS & HOLLISTER

Address: 65 EAST STATE STREET, SUITE 1000

Office#: 614-334-6105 Fax#: 614-221-2007

Mobile#: _____

E-mail: dbrey@taftlaw.com

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.

5-3-19
Date

Norma Merrin
(Signature - Respondent/Agent/Treasurer)

Treasurer
Title

Norma Merrin
(Name - Please Print)

RESPONDENT: Friends of Derek Merrin
(Please print Committee Name/ Company Name/Individual Named in Notification Letter)

Mailing Address: 8129 Bridgehampton Dr.
(Please Print)

Waterville, OH 43086

Home#: _____ Mobile#: _____

Office#: _____ Fax#: _____

E-mail: _____

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 under investigation.



FEDERAL ELECTION COMMISSION
1050 First Street, NE
Washington, DC 20463

STATEMENT OF DESIGNATION OF COUNSEL

Provide one form for each Respondent/Witness

EMAIL cela@fec.gov

FAX 202-219-3923

AR/MUR/RR/P-MUR# 7594

Name of Counsel: DONALD C. BREY

Firm: TAFT STETTINIUS & HOLLISTER

Address: 65 EAST STATE STREET, SUITE 1000

Office#: 614-334-6105 Fax#: 614-221-2007

Mobile#: _____

E-mail: dbrey@taftlaw.com

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.

5/3/19 Paul Zeltwanger Chairman
 Date (Signature - Respondent/Agent/Treasurer) Title
Paul Zeltwanger
 (Name - Please Print)

RESPONDENT: HRCC (fka Ohio House Rep. Org. Com.)
(Please print Committee Name/ Company Name/Individual Named in Notification Letter)

Mailing Address: 21 W Broad Street 7th Floor
(Please Print) Columbus, OH 43215

Home#: _____ Mobile#: _____

Office#: _____ Fax#: _____

E-mail: _____

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