Digitally signed by Kathryn Ross Katty Reve Date: 2019.05.28 08:35:46 -04'00'

65 East State Street, Suite 1000 / Columbus, Ohio 43215-4213 Tel: 614.221.2838 / Fax: 614.221.2007 www.taftlaw.com

DONALD C. BREY 614.334.6105 dbrey@taftlaw

May 23, 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

> MUR 7594 Re:

Dear Ms. Ross,

The allegations against Committee To Elect Cliff Rosenberger 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 Committee to Elect Cliff Rosenberger is attached.

ery Truly Yours, "her

Donald C. Brey

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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 Re: MUR 7594 May 3, 2019 Page 2 of 2

- 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, Honald C. Brey

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	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 Counse	el: DONALD C. BREY
Firm: TAN	FT STETTINEUS + HOLLISTER
	EAST STATE STREET, SUBTE 1000
	Office#: 614 334 6105 Fax#: 614 221 2007
	Mobile#:
E-mail:	brey@taltolow.com
The above-name notifications and	ed individual and/or firm is hereby designated as my counsel and is authorized to receive any d other communications from the Commission and to act on my behalf before the Commission
5/ 11/ 2019 Date	(Signature - Respondent/Agent/Treasurer) Title
	CLTFPOND A. ROSBAGENGENC
	(Name – Please Prim)
RESPONDEN	
	T: <u>Committee To ELECT CLEER Posenberger</u> (Please print Committee Name/ Company Name/Individual Named in Notification Letter) (S: <u>7027</u> STATE Poute 300 W.
Mailing Addres	T: <u>Committee To Event Clette Posenberger</u> (Please print Committee Name/ Company Name/Individual Named in Notification Letter) s: <u>7027</u> STATE Poute 300 W. <u>Cramesufrue</u> , On to 45113
Mailing Addres	T: <u>Committee To ELECT</u> <u>CLEER</u> <u>Posenderger</u> (Please print Committee Name/ Company Name/Individual Named in Notification Letter) (S: <u>7027</u> STATE Poute 300 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 under investigation.

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