



Griffin Terry Sumner
Member
502.568.0326 (t)
502.581.1087 (f)
gsumner@fbtlaw.com

November 27, 2019

Federal Election Commission
Office of Complaints Examination
and Legal Administration
Attn: Christal Dennis, Paralegal
1050 First Street, NE
Washington, DC 20463

Re: MUR 7661

Dear Ms. Dennis:

This letter responds to the correspondence from your office received by Kentucky Sports Radio, LLC on November 13, 2019 and the Complaint by J. McCauley Brown enclosed with that correspondence. Kentucky Sports Radio, LLC is not named as a Respondent in Mr. Brown's Complaint. But the Complaint does contain allegations—*albeit* false ones—concerning Kentucky Sports Radio, LLC. We therefore appreciate this opportunity to correct the record.

Kentucky Sports Radio, LLC is, as the Complaint states, a limited liability company organized under Kentucky law. Kentucky Sports Radio, LLC owns and operates a sports blog at www.kentuckysportsradio.com. Kentucky Sports Radio, LLC also licenses its trademark for use in sports-related apparel, accessories, and sports-related hospitality venues.

Kentucky Sports Radio, LLC does not own or operate the "Kentucky Sports Radio" radio show described in the Complaint. That radio show is syndicated by iHeart Media and staffed by iHeart Media employees and/or independent contractors. The Complaint's allegations about the content of the radio show therefore have nothing to do with Kentucky Sports Radio, LLC. Indeed, the Complaint contains no substantive allegations of conduct—much less misconduct—attributable to Kentucky Sports Radio, LLC. Accordingly, Kentucky Sports Radio, LLC respectfully requests that the Complaint be dismissed and that no action be taken against it.

Federal Election Commission
November 27, 2019
Page 2

A Statement of Designation of Counsel form is included with this letter. If the Commission needs any additional information, please let me know.

Very truly yours,



Griffin Terry Sumner
Counsel for Kentucky Sports Radio, LLC

Enclosure

EN10589.Public-10589 4840-8343-9278v1



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# 7661

Name of Counsel: Griffin Terry Sumner

Firm: Frost Brown Todd LLC

Address: 400 West Market Street, 32nd Floor

Louisville, KY 40202

Office#: 502-568-0326 Fax#: 502-581-1087

Mobile#: _____

E-mail: gsumner@fbtlaw.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.

11-26-19

Date

(Signature - Respondent/Agent/Treasurer)

Manager

Title

Andrew Jefferson

(Name - Please Print)

RESPONDENT: KENTUCKY SPORTS RADIO, LLC
(Please print Committee Name/ Company Name/Individual Named in Notification Letter)

Mailing Address: 400 Kingswood
(Please Print)

Lexington, KY 40502

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# 7661
Name of Counsel: Griffin Terry Sumner
Firm: Frost Brown Todd LLC
Address: 400 W. Market Street, 32nd floor
Louisville, KY 40202
Office#: 502-568-0326 Fax#: 502-581-1087
Mobile#: _____
E-mail: GSumner@fbt.law.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.

11-26-19 _____
Date (Signature - Respondent/Agent/Treasurer) Manager
Andrew Jefferson
(Name - Please Print) Title

RESPONDENT: Kentucky Sports Radio, LLC
(Please print Committee Name/ Company Name/Individual Named in Notification Letter)

Mailing Address: 400 Kingswood
(Please Print) Lexington KY 40502
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.