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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 to Mr. Matthew Harper Jones, enclosing a Complaint filed by J. McCauley Brown that alleges violations of the Federal Election Campaign Act and related FEC regulations. Mr. Jones appreciates this opportunity to respond and correct the record. The enclosed Affidavit demonstrates that the Complaint's allegations are false, and that the Complaint should be dismissed with no further action.

After forming an exploratory committee in September 2019 to "test-the-waters" for a potential 2020 senate campaign, Mr. Jones recently announced that he will not be a candidate for the United States Senate in 2020. When the exploratory committee was formed, Mr. Jones notified the Commission in writing that he was not a candidate for federal office at that time. That status did not ever change.

Mr. Jones is the host of a daily two-hour radio show called "Kentucky Sports Radio." That radio show is syndicated by iHeart Media, and Mr. Jones works as an employee of iHeart Media. The content of the radio show primarily involves University of Kentucky sports teams, but has always also included current events and political issues.

After announcing the formation of the exploratory committee, Mr. Jones did not further discuss the activities of the exploratory committee, seek to raise funds for the exploratory committee, or ask anyone to support any potential candidacy on the radio show. Contrary to the allegations in the Complaint, Mr. Jones certainly did not use the radio show "as a platform to promote his candidacy for U.S. Senate." There were no contributions – financial or in-kind – by iHeart Media to the exploratory committee or any potential candidacy.

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In addition to his work with iHeart Media, Mr. Jones also entered into an agreement with Simon & Schuster to author a book to be published in 2020. The agreement with Simon & Schuster was reached prior to the formation of the exploratory committee. Neither the Simon & Schuster agreement nor the book are tied to any Senate candidacy and remain in place after the announcement that Mr. Jones will not be a candidate for the Senate in 2020.

As an advance payment on book royalties, Simon & Schuster paid Mr. Jones a flat fee. Simon & Schuster did not pay for, reimburse, approve, finance, or arrange any activities or expenses associated with the tour of Kentucky counties described in the Complaint. That tour is related to the upcoming book, and all expenses incurred on the tour were paid by Mr. Jones. There were no contributions – financial or in-kind – by Simon & Schuster to the exploratory committee or any potential candidacy.

Mr. Jones respectfully requests that the Complaint be dismissed and that no further action be taken by the Commission in this matter. Along with the affidavit from Mr. Jones, a Statement of Designation of Counsel form is also included with this letter. If the Commission needs any additional information, please let me know.

Very truly yours,



Griffin Terry Sumner  
Counsel for Respondent Matthew Harper Jones

Enclosures

cc: Matthew H. Jones

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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/RRP-MUR# 7661

Name of Counsel: Griffin Terry Sumner

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Louisville, KY 40202

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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.

11/25/19  
Date

*Matthew Jones*  
(Signature - Respondent/Agent/Treasurer) Title

Matthew Jones  
(Name - Please Print)

**RESPONDENT:** MATTHEW HARPER JONES  
(Please print Committee Name/ Company Name/Individual Named in Notification Letter)

Mailing Address: 1616 Beechwood Avenue  
(Please Print) Louisville, KY 40204

Home#: \_\_\_\_\_ Mobile#: \_\_\_\_\_

Office#: \_\_\_\_\_ Fax#: \_\_\_\_\_

E-mail: Matt.Jones@kentuckysportsradio.com

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.

**AFFIDAVIT OF MATTHEW HARPER JONES**

The affiant, Matthew Harper Jones, having been duly sworn, states:

1. After forming an exploratory committee in September 2019 to consider a 2020 senate campaign, I recently announced that I will not be a candidate for the United States Senate in 2020.
2. From the outset, the exploratory committee was formed to "test-the-waters." I so notified the Commission in writing when the committee was formed. I also informed the Commission in writing that I was not a candidate for federal office at that time.
3. I have reviewed the Complaint filed by J. McCauley Brown alleging violations of the Federal Election Campaign Act and related FEC regulations and believe those allegations to be false.
4. Until this Complaint was filed, I was the host of a daily two-hour radio show called "Kentucky Sports Radio."
5. The Kentucky Sports Radio radio show is syndicated by iHeart Media. My work on the radio show is as an employee of iHeart Media.
6. The content of the radio show primarily involves University of Kentucky sports teams, but has always also included current events and political issues.
7. After announcing the formation of the exploratory committee, I did not further discuss the activities of the exploratory committee, seek to raise funds for the exploratory committee, or ask anyone to support any potential candidacy on the radio show.
8. I did not use the radio show "as a platform to promote [my] candidacy for U.S. Senate" as the Complaint alleges.
9. There were no contributions – financial or in-kind – by iHeart Media to the exploratory committee or any potential candidacy.

