



700 13th Street, NW
Suite 600
Washington, D.C. 20005-3960

T +1.202.654.6200
F +1.202.654.6211
PerkinsCoie.com

February 14, 2020

BY MESSENGER AND ELECTRONIC MAIL

Jeff. S. Jordan, Esq.
Assistant General Counsel
Complaints Examination & Legal Administration
Federal Election Commission
1050 First Street, N.E.
Washington, D.C. 20463

Re: MUR 7670

Dear Mr. Jordan:

We write on behalf of Hickenlooper 2020 and Blanca Uzeta O’Leary in her official capacity as treasurer, and Giddy Up PAC and Stephanie Donner in her official capacity as treasurer (collectively, “Respondents”) in response to the complaint in MUR 7670 (the “Complaint”).

“The Commission may find ‘reason to believe’ only if a complaint sets forth sufficient specific facts, which, if proven true, would constitute a violation of the FECA.”¹ The Complaint here does not allege that Respondents committed any violation of the Federal Election Campaign Act of 1971, as amended, or Commission regulations, much less provide any specific facts that could constitute a violation.² The only time the Complaint even mentions Respondents is to observe that Respondents did not report any disbursements to Governor John Hickenlooper’s Colorado state gubernatorial campaign committee or Putnam Partners, LLC.³ The Federal Election Commission must dismiss this Complaint.

Respondents also incorporate by reference the response submitted in this matter by Hickenlooper for Colorado and Mark Turnage in his official capacity as treasurer.

¹ Statement of Reasons of Commr’s Mason, Sandstrom, Smith & Thomas at 1, MUR 4960 (Hillary Rodham Clinton for US Senate Exploratory Committee) (Dec. 21, 2000).

² See generally Complaint (Dec. 11, 2019).

³ *Id.* at 4.

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Very truly yours,

A handwritten signature in blue ink, appearing to be 'M. Elias', written over a horizontal line.

Marc E. Elias
Jonathan S. Berkon
Shanna M. Reulbach

Counsel to Respondents