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April 3, 2020

SENT VIA U.S. MAIL:

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

Re: MUR 7692

Ms. Ross:

Please accept the following as our response to the Federal Election Commission's ("the Commission") February 6, 2020 letter to Scott Coleman relative to allegations that Mr. Coleman violated the Federal Election Campaign Act of 1971, as amended ("the Act") in furtherance of his misconduct involving Friends of Dave Joyce ("FDJ"). As you know, Mr. Coleman was charged with one count of Grand Theft in violation of Ohio Revised Code 2913.02(A)(1), a felony of the fourth degree, by the Geauga County Prosecutor's Office. Mr. Coleman entered a plea of "Guilty" to the charge and was sentenced on October 2, 2019. (A copy of the Sentencing Journal Entry is attached hereto as *Exhibit A*.) He was sentenced, in part, to two years of community control sanctions (probation) including a thirty (30) day jail term and fined \$5,000.00

It is respectfully submitted that no further action should be taken by the Commission, as Mr. Coleman has accepted responsibility for his misconduct, fully repaid the misappropriated funds, plus costs associated with the investigation, and has faced harsh consequences as a result of his poor choices. Importantly, he is no longer engaged in politics, in any capacity, and any further action on the part of the Commission will return no further benefit to the public. To the contrary, despite extensive costs and efforts associated with further action by the Commission or a referral to federal law enforcement, further action will yield no additional accountability, restitution, or other benefit to the Commission or the people.

To further illustrate Mr. Coleman's remorse and the acceptance of responsibility for his misconduct, and to provide mitigating material, we have attached the Sentencing Memorandum filed in Mr. Coleman's criminal case and relied upon by Judge Ondrey at the time of sentencing (*See Exhibit B.*) As you can see from the Sentencing Memorandum, Mr. Coleman has accepted full responsibility for his misconduct and those who know him best recognize that his illegal acts are not consistent with his character and his lifetime of good deeds and service.

We trust that the Commission will consider all of the evidence before it and recognize that although Mr. Coleman's actions may have violated the Act, he has accepted responsibility by pleading "Guilty" to the bill of information under which he was charged and has consistently demonstrated remorse for his conduct. Upon the opening of the criminal investigation, Mr. Coleman immediately accepted responsibility and worked with the prosecutor's office to provide full transparency. The consequences of his actions have been tremendous, as he is no longer engaged in any political activity, lost his job at Progressive Insurance, has a felony conviction and paid \$341,983.06 in restitution, plus additional financial expenditures relating to this matter.

As such, although we recognize that the Committee has the legal authority to take additional action against Mr. Coleman, he respectfully requests that the matter be closed and that the Commission accepts that justice has already been attained and that the sanctions imposed on him by the Court is sufficient to address his misconduct.

Should you have any further questions or concerns relating to this matter, please do not hesitate to contact me directly.

Very truly yours,

A handwritten signature in black ink, appearing to read "Eric F. Long".

Eric F. Long