MUR770700041

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April 23, 2020

Mr. Jeff S. Jordan, Assistant General Counsel Attn: Kathryn Ross, Paralegal Office of Complaints Examination and Legal Administration Federal Election Commission 1050 First Street, NW Washington, DC 20463

Re: Matter Under Review 7707 (American Muscle Car Museum)

Dear Mr. Jordan:

We represent Mr. Mark Pieloch and Mrs. Tetiana Pieloch in connection with this matter. Enclosed, please find a Statement of Designation of Counsel executed by both individuals in their personal capacities.

On April 18, 2020, the Commission's CELA Office informed us that, unbeknownst to either us or our clients, the Commission named Mr. and Mrs. Pieloch as individual respondents in this matter. The FEC's notices to this effect were apparently mailed to Orchid, Florida. That property was sold in 2019, so the Pielochs did not receive the Commission's communications.

As to the substance of the complaint's allegations, Mr. Pieloch hereby adopts the response filed by the American Muscle Car Museum on April 17, 2020.

As to Mrs. Pieloch, the complaint did not assert any allegations that she violated the Federal Election Campaign Act of 1971, as amended ("Act"), and she should not have been added as a respondent. Indeed, the facts and circumstances established in the Museum's response clearly demonstrate that she was not even implicated in the legal theory that is the focus of the complaint, much less that she in any way violated the Act. Accordingly, the Commission should find no reason to believe that Mrs. Pieloch violated the Act and dismiss her from the matter forthwith.

Sincerely,

Lee E. Goodman Andrew G. Woodson

Enclosure (Statement of Designation of Counsel)



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FEDERAL ELECTION COMMISSION Washington, DC 20463

Statement of Designation of Counsel Provide one form for each Respondent/Witness Note: You May E-Mail Form to: CELA@fec.gov
CASE:MUR 7707
Name of Counsel: Lee E. Goodman and Andrew G. Woodson
Firm: Wiley Rein LLP
Address: 1776 K Street, N.W.
Washington, DC 20006
Telephone: (<u>202</u>) 719-7378 Fax: (<u>202</u>) 719-7049
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. O4-21-2020 Date Signature Title RESPONDENT: Mark Pieloch & Tetiana Pieloch (Committee Name/Company Name/Individual Named In Notification Letter) MAILING ADDRESS: Contact Thru Counsel
Telephone:(H): (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 receiving the notification or the person with respect to whom the investigation is made.