

April 1, 2020

Mr. Jeff Jordan  
Assistant General Counsel  
Complaints Examination & Legal Administration  
Federal Election Commission  
1050 First Street NE  
Washington, DC 20463

Attn: Ms. Kathryn Ross, Paralegal

**Re: *Response of Cory Gardner and Cory Gardner for Senate in MUR 7719***

Dear Mr. Jordan:

This response to the Complaint filed in Matter Under Review 7719 is submitted on behalf of Cory Gardner and Cory Gardner for Senate, and Lisa Lisker, in her capacity as Treasurer of Cory Gardner for Senate, by the undersigned counsel.

Cory Gardner is a United States Senator, and candidate for re-election to the U.S. Senate. Cory Gardner for Senate (“the Campaign”) is Senator Gardner’s authorized campaign committee, which first registered with the Commission on February 7, 2013. Lisa Lisker serves as the Campaign’s Treasurer.

The Complaint alleges that Senate Leadership Fund made “illegal in-kind contributions to Cory Gardner’s campaign for U.S. Senate” and the campaign “accepted illegal in-kind contributions from SLF.” The Campaign has not accepted any in-kind contributions from the Senate Leadership Fund. Neither the Campaign, nor Senator Gardner, nor any person working on behalf of the Campaign or Senator Gardner had any involvement with SLF’s text messages or webpage. The Complaint does not contain any allegation that SLF’s text messages or webpage are coordinated communications as set forth at 11 C.F.R. § 109.21, and no one associated with the Campaign or Senator Gardner engaged in any of the conduct specified at § 109.21(d) with Senate Leadership Fund.

The webpage on the WinRed site that is referenced in the Complaint includes a disclaimer indicating it was paid for by Senate Leadership Fund and not authorized by any candidate or candidate’s committee. The Campaign and Senator Gardner have no further information on Senate Leadership Fund’s text message and webpage. It is the Campaign’s understanding that, with respect to all contributions received by the Campaign through WinRed, the Campaign pays credit card processing and transaction fees to WinRed Technical Services. The Campaign has not received any contributions through WinRed where that was not the case.

With respect to the Complainant’s allegation that “neither SLF nor Cory Gardner for Senate have reported the contributions,” the Campaign reports all contributions as

required by the Act and Commission regulations on the appropriate report. To date, the Campaign has not received any in-kind contributions from Senate Leadership Fund.

The Commission should dismiss the Complainant's allegations expeditiously.

Sincerely,

Jessica Furst Johnson  
Counsel for Cory Gardner for Senate



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](mailto:cela@fec.gov)

FAX 202-219-3923

AR/MUR/RR/P-MUR# 7719

Name of Counsel: Jessica F. Johnson

Firm: Holtzman Vogel Josefiak Torchinsky PLLC

Address: 2300 N Street, NW Suite 643A

Washington DC, 20037

Office#: 202-737-8808 Fax#: 540-341-8809


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

E-mail: Jessica@hvjt.law

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.

03/23/2020

Date

  
\_\_\_\_\_  
(Signature) Respondent/Agent/Treasurer

Candidate

Title

Cory Gardner  
\_\_\_\_\_  
(Name - Please Print)

**RESPONDENT:** Cory Gardner for Senate; Cory Gardner  
(Please print Committee Name/ Company Name/Individual Named in Notification Letter)

Mailing Address: 9227 E. Lincoln Ave., #200-234  
(Please Print)

Lone Tree, CO 80124

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

Office#: 703-281-7540 Fax#: \_\_\_\_\_

E-mail: LLisker@hdafec.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.



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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.

03/23/2020  
Date

*Lisa R. Lisker*  
(Signature - Respondent/Agent/Treasurer)

Treasurer  
Title

Lisa R. Lisker, Treasurer  
(Name - Please Print)

**RESPONDENT:** Cory Gardner for Senate; Lisa Lisker, Treasurer  
(Please print Committee Name/ Company Name/Individual Named in Notification Letter)

Mailing Address: 9227 E. Lincoln Ave., #200-234  
(Please Print)

Lone Tree, CO 80124

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

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