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July 2, 2020

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Federal Election Commission

Office of Complaints Examination &

Legal Administration

AttN Christal Dennis, Paralegal

1050 First Street, NE

Washington, DC 20463

**Re: MUR 7746**

Dear Sir/Madam:

I am the attorney for Respondent, Maureen for Congress. I offer this response to the Complaint filed with this office and provided to my client on or about June 17, 2020.

I would like to first summarize the allegations contained in the Complaint by Mr. Raizel Cohn dated June 11, 2020.

1. Exhibit A regarding an internet picture on Facebook on my client's webpage.
2. Exhibit B regarding an internet picture on Facebook on my client's webpage.
3. Exhibit C regarding an internet page of the Maureen for Congress website request for donations.
4. Exhibit D regarding an internet page of the Maureen for Congress website NO show fundraiser.

Then the Complaint alleges that compliance with the required disclaimer in Exhibits E and F is relevant to the alleged violations contained in Exhibit's A thru D above. I do not see the relevance of this claim.

**Applicable Law:**

There has been no violation of the Federal Election Campaign Act of 1971 (hereinafter "FECA").

**Application of FECA to facts alleged:**

Conclusion: All of the alleged communications contained in Exhibit's A thru D are not regulated "Public Communications" under the FECA.

Exhibit's A thru D are not "Public Communications" as defined by the FECA. There is no evidence that the communications were placed for a fee on another website as they were on the Maureen for Congress website. Further, these Exhibits are not a *general public political advertising* as such term does not include any Internet communication except for a communication placed for a fee on another entity website.

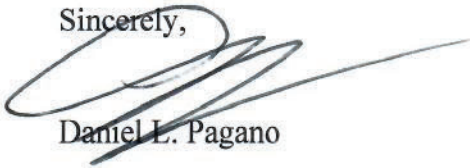
The complaint itself concedes this fact at Footnote 1.

This complaint is frivolous and submitted on the eve of the primary to distract the candidate.

Therefore, I respectfully request that no action be taken.

Respondent is willing to discuss this matter and fully cooperate going forward to ensure that compliance with the law is done.

Sincerely,



Daniel L. Pagano

Cc: Maureen McArdle