Kathryn Ross Digitally signed by Kathryn Ross
Date: 2020.07.08 08:01:20 -04'00'

Arnold & Porter

James P. Joseph
+1 202.942.5355 Direct
James.Joseph@arnoldporter.com

CONFIDENTIAL

July 7, 2020

VIA E-MAIL [CELA@FEC.GOV]

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

Re: MUR 7754 – Request for Extension

Dear Mr. Jordan:

This requests an extension of time to respond to the letter from the Federal Election Commission (the "Commission") informing our clients, Pacific Atlantic Action Coalition ("PAAC") and Pacific Environmental Coalition ("PEC") (collectively, the "Respondents"), of a complaint filed against them by the Campaign Legal Center in the above referenced matter (the "Complaint"). The Respondents received the letter on June 30, 2020, and the response is currently due July 15, 2020.

We respectfully request a thirty (30) day extension of time, until August 14, 2020, to respond to the Complaint. The thirty day extension of time will permit us to properly evaluate the allegations and attached materials, research and compile necessary documentation, and ensure a complete and accurate response.

In addition to the Respondents PAAC and PEC, the Commission also sent a notification naming Matt Cohler as a respondent in this matter in his individual capacity. Mr. Cohler is a director and officer of PAAC and PEC, and he is not named as a respondent in the Complaint. If Mr. Cohler was listed incorrectly as a respondent in this matter, we request that all such references to him as a respondent in his individual capacity be removed. If the Commission asserts that Mr. Cohler is a respondent in this matter, we request a similar thirty (30) day extension to respond on his behalf. We have included a Designation of Counsel form from Mr. Cohler, if required.

Arnold & Porter

I appreciate your consideration of this request. If you require additional information, please contact me directly.

Sincerely,

James P. Joseph
Counsel to Pacific Atlantic Action Coalition
Counsel to Pacific Environmental Coalition
Counsel to Matt Cohler

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 **FAX 202-219-3923**

AR/MUR/RR/P-MUR# 7754

Name of Counsel: James P. Joseph, Esq.

Firm: Arnold & Porter Kaye Scholer LLP

Address: 601 Massachusetts Avenue, NW
Washington, DC 20001

Office#: (202) 942-5355 Fax#: (202) 942-5999

Mobile#:

E-mail: James.Joseph@arnoldporter.com

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.

7/7/2020	Tom van Loben Sels	Treasurer
Date	(Signature - Respondent/Agent/Treasurer)	Title

Tom van Loben Sels
(Name – Please Print)

RESPONDENT: Pacific Atlantic Action Coalition
(Please print Committee Name/ Company Name/Individual Named in Notification Letter)

Mailing Address: 314 Lytton Avenue, Suite 200
(Please Print)
Palo Alto, CA 94301

Home#: Mobile#:

Office#: (650) 804-7100 Fax#: (650) 804-7180

E-mail: exempt@apercen.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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Washington, DC 20463

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EMAIL cela@fec.gov **FAX 202-219-3923**

AR/MUR/RR/P-MUR# 7754

Name of Counsel: James P. Joseph, Esq.

Firm: Arnold & Porter Kaye Scholer LLP

Address: 601 Massachusetts Avenue, NW
Washington, DC 20001

Office#: (202) 942-5355 Fax#: (202) 942-5999

Mobile#:

E-mail: James.Joseph@arnoldporter.com

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07/07/20 — Date

(Signature - Respondent/Agent/Treasurer)

Treasurer — Title

Melissa Carrig
(Name – Please Print)

RESPONDENT: Pacific Environmental Coalition
(Please print Committee Name/ Company Name/Individual Named in Notification Letter)

Mailing Address: (Please Print) 314 Lytton Avenue, Suite 200
Palo Alto, CA 94301

Home#: Mobile#:

Office#: (650) 804-7100 Fax#: (650) 804-7180

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Rev. 2018

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EMAIL cela@fec.gov **FAX 202-219-3923**

AR/MUR/RR/P-MUR# 7754

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Address: 601 Massachusetts Avenue, NW
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Office#: (202) 942-5355 Fax#: (202) 942-5999

Mobile#:

E-mail: James.Joseph@arnoldporter.com

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7/7/20
Date

(Signature - Respondent/Agent/Treasurer)

Respondent
Title

Matt Cohler
(Name – Please Print)

RESPONDENT: Matt Cohler
(Please print Committee Name/ Company Name/Individual Named in Notification Letter)

Mailing Address: 314 Lytton Avenue, Suite 200
(Please Print)
Palo Alto, CA 94301

Home#: Mobile#:

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