

# SANDLER REIFF

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July 30, 2020

Federal Election Commission  
Office of Complaints Examination and Legal Administration  
Attn: Kathryn Ross, Paralegal  
1050 First Street, NE  
Washington, D.C. 20463

Re: MUR 7754

Ms. Ross:

The undersigned serves as counsel to VoteVets, a “PAC with Non-Contribution Account” registered with the Commission, C00418897. This letter responds on behalf of VoteVets to the Commission’s notification of a complaint from the Campaign Legal Center and Margaret Christ (the “Complaint”).

While VoteVets is not named as a respondent in this Complaint, nor are *any* allegations of wrongdoing made against VoteVets specifically, VoteVets appreciates the opportunity to respond and clear its name in this matter. VoteVets was unaware of *any* indication that would have led them to suspect that the Pacific Environmental Coalition’s contribution was potentially made from another source.

VoteVets was patently unaware that any funds contributed from the Pacific Environmental Coalition may have been unlawful, or even potentially from another source. Not only does the Complaint not allege that VoteVets had any knowledge that Pacific Environmental Coalition’s contribution may not have been from general organizational funds, VoteVets did not have any knowledge to that effect.

VoteVets simply followed Commission rules and precedent: “*Absent evidence to the contrary, any contribution made by check, money order, or written instrument shall be reported as a contribution by the last person signing the instrument prior to delivery to the candidate or committee.*”<sup>1</sup>

VoteVets did not have information to the contrary – the wire received on February 13, 2020 was from Pacific Environmental Coalition, so it was reported as such. VoteVets reported

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<sup>1</sup> 11 C.F.R. § 104.8(c).

the contribution promptly and properly on its February report.<sup>2</sup> If, after a thorough investigation, the Commission requests that VoteVets amend its reports to reflect a different donor, it will do so at that time.

Given the above, we request that the Commission determine that there is no reason to believe that VoteVets committed any violation, and close the file in this matter in relation to the PAC.

Sincerely,

A handwritten signature in blue ink, appearing to read "Neil Reiff".

Neil Reiff

A handwritten signature in blue ink, appearing to read "David Mitrani".

David Mitrani

Counsel for VoteVets

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<sup>2</sup> VoteVets, Form 3x, March Monthly Report at 89, available at <https://docquery.fec.gov/pdf/654/202003209204669654/202003209204669654.pdf> (last accessed July 30, 2020).