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**VIA E-MAIL ([CELA@FEC.GOV](mailto:CELA@FEC.GOV))**

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

**Re: MUR 7758 (Republican National Committee)**

Dear Mr. Jordan:

We represent the Republican National Committee (the “RNC”) and Ronald C. Kaufman in his official capacity as Treasurer of the RNC in the above-captioned matter.

We have reviewed the complaint filed on July 9, 2020, by Alexander Joseph Zajac (the “Complaint”) alleging “improper coordination” among “three 527 organizations” and “eight campaigns.” Notably, the RNC is not one of these 11 entities identified in the Complaint. As explained below, the Complaint does not allege any violations of Federal Election Commission (“FEC” or “Commission”) regulations or the Federal Election Campaign Act of 1971, as amended (“FECA”), by the RNC. In light of the foregoing, the RNC should not have been named as a respondent, and the Commission should promptly dismiss the RNC from this matter.

The Complaint is based on a series of fundraising emails from the 11 identified entities that appear to have been sent from the same vendor email address, which the Complaint contends is “evidence of *at least some* coordination between the three 527 organizations and the eight campaigns” (emphasis in original). The Complaint does not identify the RNC as one of these 11 entities nor does it attach any fundraising emails from the RNC. Rather, the Complaint merely notes that one of the identified groups—Trump Make America Great Again Committee (“TMAGAC”)—is a joint fundraising committee composed of Donald J. Trump for President, Inc. and the RNC. As a joint fundraising committee, TMAGAC is a separate legal entity, and its activities are not automatically attributable to the RNC under either FECA or FEC regulations. We understand that TMAGAC will be filing its own response with the Commission refuting the speculative and legally baseless allegations in the Complaint. The Complaint otherwise does not allege any facts concerning the RNC, let alone “sufficient specific facts, which, if proven true, would constitute a violation of the FECA.”<sup>1</sup>

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<sup>1</sup> MUR 4960 (Hillary Rodham Clinton for U.S. Senate Exploratory Committee), Statement of Reasons of Commissioners David M. Mason, Karl J. Sandstrom, Bradley A. Smith, and Scott E. Thomas at 1 (Dec. 21, 2000).

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For all the foregoing reasons, the Commission should find no reason to believe the RNC violated FECA or Commission regulations and should promptly dismiss the RNC from this matter.

Respectfully submitted,

*/s/ Michael E. Toner*

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