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November 18, 2022

Aaron Rabinowitz
Federal Election Commission
Office of the General Counsel
Attn: Kathryn Ross, Paralegal
1050 First Street, NE
Washington, D.C. 20463

Via email to cela@fec.gov

Re: MUR 7772 (Andrew Keys)

Dear Mr. Rabinowitz:

This letter, with attachments, responds on behalf of Andrew Keys to the Commission's notification of a complaint alleging violations of the Federal Election Campaign Act in the course of certain political activities in Puerto Rico.

Nothing in the complaint nor in other information available to us elsewhere suggests any reason to believe Mr. Keys should be responsible for any violations of the Act. As further detailed in the attached declaration, Mr. Keys does recall contributing to Foundation for Progress in October of 2020. He understood that group itself to be a PAC, but does not recall any details about its operations or specific plans. He has conducted a search of his financial records and related documentation, and reports that he found no indication of any solicitation from or donation to Salvemos a Puerto Rico, either directly or indirectly.

In sum, based on the information available to us it only appears that Mr. Keys made a garden variety political contribution to a group he understood to be a PAC, in an amount that would be permissible to a "traditional" PAC, and that he had nothing else to do with any of the events described in the complaint. Simply put Mr. Keys is at most a witness in this matter, and through the attached declaration and check copy he is enclosing what he recalls and has been able to find about these circumstances together with this response.

We therefore respectfully urge the Commission to find that there is no reason to believe that Andrew Keys committed any violation of the Act, and close the file in this matter with respect to him.

Sincerely,



Joseph M. Birkenstock
Counsel for Andrew Keys

Enc.

**BEFORE THE
FEDERAL ELECTION COMMISSION**

Declaration of Andrew Keys

1. My name is Andrew Keys. I am over 21 years of age, of sound mind, and I have personal knowledge of the facts stated below.
2. I was surprised to receive a notification from the Federal Election Commission regarding MUR 7772, since I have only general recollection of a handful of efforts in 2020 to help support the re-election of Puerto Rico Governor Pedro Pierluisi, and no recollection of the chain of events described in the complaint.
3. Upon connecting with counsel, I reviewed my records and identified one contribution I made to a group called Foundation for Progress, via check #325 dated 10/21/20, copy attached.
4. I understood Foundation for Progress to be a PAC, that in some way unknown to me would work to re-elect the Governor.
5. While I make no effort to understand the totality of the laws governing PACs and political contributions, I had a general expectation that Foundation for Progress would disclose me as a donor to it in the course of whatever filings it makes to the FEC.
6. I have had no role (past, present, or future) with Foundation for Progress other than as a one-time donor. I am not and was not involved in any of its management or operations, and did not know – and honestly did not care to know – any details of exactly how Foundation for Progress would support the Pierluisi campaign.
7. I have a general recollection that there were plans to have some kind of in-person fundraising event in connection with this effort, but to the best of my recollection this event did not take place.
8. Prior to talking with counsel, I was not familiar with Salvemos a Puerto Rico and have no recollection of making a contribution to this group, either directly or indirectly. I have searched my records and found no indication of making any contribution to it.



Andrew Keys

Date: 11/17/2022

**BEFORE THE
FEDERAL ELECTION COMMISSION**

**Attachment to the
Declaration of Andrew Keys**

Check number: 325 | Amount: \$5,000.00

ANDREW KEYS
DORADO, PR 00646

EDGE BANKING
TABLE DECKN GOLD LINE®

10/21/20
DATE

325
10-2012 20
2020

Pay to the
Order of Foundation for Progress \$ 5,000
Five Thousand

BANK OF AMERICA

ACCT # 0120123

For _____

Acct # redacted 0325