



The DiSantis Law Firm, LLC

September 25, 2020

Jeff S. Jordan, Esq.
Assistant General Counsel
Complaints Examination & Legal Administration
Federal Election Commission
1050 First Street, N.E.
Washington, DC 20463
Via Electronic Mail to cela@fec.gov

Re: Response to MUR 7774 by Canal Partners Media LLC

Dear Mr. Jordan:

I represent Canal Partners Media LLC (CPM) in the matter of MUR 7774. While CPM is not the entity against whom the complaint was filed, CPM is named and received notice from the FEC. Please accept this letter as the response of CPM in response to its notice of the matter.

Statement of Facts

CPM is named in the complaint as the company that placed broadcast advertising for Antone for Congress (the "committee"), as detailed in the public files available via the Federal Communications Commission (FCC). CPM is an established business with offices in Georgia and the District of Columbia that handles broadcast advertising placement for candidates for federal, state and local elected office nationwide.¹ CPM was created as a Georgia limited liability company on September 10, 2013.²

CPM is regularly engaged by political media consulting companies to provide advertising placement of the broadcast advertisements the media consultants produce, generally referred to in the Democratic political consulting business as "time buying." This arrangement is standard industry practice, with CPM and its competitors in the time buying business regularly functioning as subcontractors to media consulting companies. As such, CPM and similar time buying companies often would not be a payee of a campaign committees whose advertising it was placing, and consequently would appear on that campaign committee's FEC report.

Please note that the FCC records cited in the complaint are filed by broadcasters and made public pursuant to legal requirements placed on broadcasters regarding advertising by political candidates. The relevant statutes and FCC regulations require that records of political advertising placement be placed in a "public file" by broadcasters.³ CPM's appearance on records of purchases of advertising time for

¹ <http://www.canalpartnersmedia.com>

² Georgia Secretary of State incorporation record for Canal Partners Media LLC, Attachment 1

³ 47 CFR § 73.1943

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Antone for Congress in FCC records is consistent with its role as a subcontractor placing broadcast advertising for the political media consultant.

Legal Conclusion

Federal Election Commission precedent clearly establishes that the Commission should find "reason to believe" and proceed with further action only if the complaint asserts facts that if proven true would be a violation of the Federal Election Campaign Act or FEC regulations.⁴ That standard has not been met with regard to CPM.

CPM is a going concern that provides time buying services, often as a subcontractor to a political media consulting firm, which is consistent with standard industry practice. That is the manner in which it was engaged to place broadcast advertisements for Antone for Congress. Consistent with that practice, it was not a payee, and would therefore not appear on Antone for Congress reports to the FEC. As a for profit corporation and vendor, CPM itself has no responsibility for reporting its activity to the FEC.

As such, CPM respectfully requests that the FEC determine that no further action is warranted regarding its work on behalf of Antone for Congress. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeffrey J. DiSantis". The signature is fluid and cursive, with a long horizontal stroke at the end.

Jeffrey J. DiSantis, Esq.
Phone: (404) 479-9927 x 701
Email: jeff@disantis.com

Attachment

⁴ MUR 4960 (Hillary Rodham Clinton for U.S. Senate Exploratory Committee, Inc.), Statement of Reasons of Commissioners David M. Mason, Karl J. Sandstrom, Bradley A. Smith, and Scott E. Thomas.

9/25/2020

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[HOME \(/\)](#)**BUSINESS SEARCH****BUSINESS INFORMATION**

Business Name:	Canal Partners Media, LLC	Control Number:	13449951
Business Type:	Domestic Limited Liability Company	Business Status:	Active/Compliance
Business Purpose:	NONE		
Principal Office Address:	900 Circle 75 Pkwy SE, Suite 1650, Atlanta, GA, 30339, USA	Date of Formation / Registration Date:	9/10/2013
State of Formation:	Georgia	Last Annual Registration Year:	2022

REGISTERED AGENT INFORMATION

Registered Agent Name: **David A. Eastman, Esq.**
Physical Address: **881 Piedmont Avenue, Atlanta, GA, 30309, USA**
County: **Fulton**

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Office of the Georgia Secretary of State Attn: 2 MLK, Jr. Dr. Suite 313, Floyd West Tower Atlanta, GA 30334-1530,

Phone: (404) 656-2817 Toll-free: (844) 753-7825, WEBSITE: <https://sos.ga.gov/>

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