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October 20, 2020

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 Assistant General Counsel  
 Complaints Examination & Legal Administration  
 Federal Election Commission  
 1050 First Street NE  
 Washington, DC 20463

**VIA E-MAIL:** [cela@fec.gov](mailto:cela@fec.gov)

**Re: MUR 7808: Response for John James and John James for Senate, Inc.**

We write on behalf of John James and John James for Senate (collectively “the Respondents”) in response to a complaint alleging that the Respondents violated the Federal Election Campaign Act of 1971, as amended (“FECA”) and Commission regulations by making a contribution to Outsider PAC, an independent-expenditure-only political committee, years ago in the 2018 cycle.<sup>1</sup> Specifically, the Complainant alleges that because James was an officer of Renaissance Global Logistics (“RGL”) at the time RGL contributed to Outsider PAC, the contribution must have been (1) coordinated with Outsider PAC and (2) solicited by James outside of the contribution limits and source prohibitions. Neither of these claims are true, as Respondents had no involvement in the contribution made by RGL to Outsider PAC. Therefore, we ask the Commission to find no reason to believe and close the file.

### **I. Facts and Legal Analysis.**

John James is the current Republican nominee for Michigan’s Senate seat. He previously ran against Senator Debbie Stabenow in the 2018 election cycle. RGL is an LLC that is a subsidiary of James Group International, Inc. (“JGI”). James is President of JGI and Chief

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<sup>1</sup> Please note that John James for Senate, James’ 2018 campaign committee, was neither listed as a Respondent in the matter or mentioned at all in the Complaint. Rather, the Commission’s Office of General Counsel (OGC) unilaterally decided to make them a Respondent. This sort of practice is unfortunately common, and has been previously been discussed by former Commissioners. *See generally* Statement of Reasons of Vice Chair Caroline C. Hunter and Commissioner Lee E. Goodman, MUR 6920 (American Conservative Union, *et al.*); Statement of Lee E. Goodman, MUR 7073 (Melusky, *et al.*). While there have been drafts proposed to make this sort of conduct Commission policy, these items have not been approved by the Commission. *See* Agency procedure for Notice to Potential Respondents in Enforcement Matters, Draft Circulated by Steven T. Walther (July 15, 2009), available at <https://www.fec.gov/resources/updates/agendas/2009/mtgdoc0947.pdf>

Executive Officer of RGL,<sup>2</sup> both of which have full Boards of Directors. Outsider PAC is an independent-expenditure-only political committee that was active in the 2018 election cycle supporting John James for Senate and opposing Senator Stabenow.<sup>3</sup>

On November 1, 2018, RGL made a contribution totaling \$10,000 to Outsider PAC. Outsider PAC later made an independent expenditure attacking James' opponent, Senator Debbie Stabenow.

Based solely on this contribution and James' title as CEO of RGL, the Complainant makes two significant allegations: (1) that the contribution was made in coordination between Outsider PAC and James; and (2) that James solicited the contribution from RGL to Outsider PAC, violating the Commission's soft money regulations. However, both of these allegations are untrue, as neither James nor his Campaign had any involvement with the contribution made by RGL to Outsider PAC.

During the time that James has been a candidate for federal office, he has had no involvement in RGL's political contributions to any candidate or other political organization.<sup>4</sup> James has followed this in both the 2018 and the 2020 cycle. This also applies to the Campaign. No agent of the Campaign had any involvement with the contribution from RGL to Outsider PAC.

## II. Conclusion.

Given the Complainant's long-term goals,<sup>5</sup> it does not take a rocket scientist to determine why it filed this Complaint. In fact, this Complaint is just another example of a laundry list of politically motivated complaints this organization has filed against various conservative political organizations. The allegations at issue in this case are based solely on inference, and are not supported by any facts or evidence. James and John James for Senate have been in full legal compliance with FECA and Commission regulations, and they have maintained their compliance in this regard. We ask that the Commission finds no reason to believe and promptly closes the file.

Respectfully submitted,



Charlie Spies  
Katie Reynolds  
*Counsel to John James and John James for Senate, Inc.*

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<sup>2</sup> "JG Difference", James Group International, available at <https://www.jamesgroupintl.com/difference> (identifying James as President of JGI).

<sup>3</sup> See Financial Summary (2017-2018), Outsider PAC, available at <https://www.fec.gov/data/committee/C00678920/?cycle=2018>

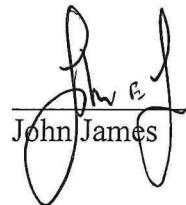
<sup>4</sup> See Affidavit of John James.

<sup>5</sup> See Our Mission, End Citizens United, available at (identifying themselves as an organization that is working to "fix our democracy by getting big money out of politics.")

Declaration of John James

I, John E. James, being of lawful age, and duly sworn, do allege and state the following statements are true to the best of my belief and knowledge, and state that I am willing to testify to the same if called as a witness.

1. My name is John James.
2. I am the Republican nominee for Michigan's Senate seat in the 2020 election cycle. I was previously the Republican nominee for Michigan's Senate seat in the 2018 election cycle.
3. John James for Senate is my official campaign committee.
4. I am President of James Group International, Inc. In this role, I am also the Chief Executive Officer of Renaissance Global Logistics, LLC.
5. During my time as a candidate for Senate, I had no involvement in any political contributions made by Renaissance Global Logistics to any political candidate or organization. I was specifically fire-walled off from all corporate political spending decisions.
6. I had no knowledge of and had no involvement in Renaissance Global Logistics' contribution to Outsider PAC. I learned of the contribution when it was publicly disclosed.
7. I have no relationship with Outsider PAC, and have never solicited funds from anyone on its behalf.



John James

10/16/20

DATE



**FEDERAL ELECTION COMMISSION  
Washington, DC 20463**

## **Statement of Designation of Counsel**

**Provide one form for each Respondent/Witness**

**Note: You May E-Mail Form to: CELA@fec.gov**

**CASE:** In all matters

**Name of Counsel:** Charlie Spies

**Firm:** Dickinson Wright PLLC

**Address:** 1825 I Street NW, Suite 900

Washington, DC 20009

**Telephone:** (202) 466-5964 **Fax:** (877) 670-6009

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. 

3/10/2020  
Date

John  
Signature

TREASURER

**RESPONDENT:** John James for Senate, Inc.

(Committee Name/Company Name/Individual Named In Notification Letter)

**MAILING ADDRESS:**

John James for Senate, Inc.

**Telephone:** (H): \_\_\_\_\_ (W): \_\_\_\_\_

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 receiving the notification or the person with respect to whom the investigation is made.



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3/10/2020  
**Date**

J. E. J.  
**Signature**

**Title**

**RESPONDENT:**

John James

(Committee Name/Company Name/Individual Named In Notification Letter)

**MAILING ADDRESS:**

Farmington Hills, MI 48334

**Telephone:** (248) 514-9015 **(W):** \_\_\_\_\_

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