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By OGC-CELA at 9:59 pm, Oct 29, 2020

CLARK HILL

Brian D. Shekell
T (313) 965-8803
F (313) 309-6833
Email:BShekell@ClarkHill.com

Clark Hill PLC
500 Woodward Ave., Suite 3500
Detroit, MI 48226
T (313) 965-8300
F (313) 309-6833

clarkhill.com

October 29, 2020

BY EMAIL

Jeff S. Jordan
Assistant General Counsel
Federal Elections Commission
1050 First Street NE
Washington, DC 20463
cela@fec.gov

Re: MUR 7808
Response of Renaissance Global Logistics, LLC

Dear Mr. Jordan:

We represent Renaissance Global Logistics, LLC (“RGL”) in connection with the September 30, 2020 Complaint (“Complaint”) filed by End Citizens United PAC and Tiffany Muller (“Complainants”). Please allow this letter to serve as the Response of RGL to the Complaint and your correspondence dated October 5, 2020, which was received by RGL on October 14, 2020.

The Complaint’s allegations are unfounded and demonstrably false. As is clear from the vague, noncommittal, and speculative language used by the Complainants in their Complaint, there are simply no facts to support the allegations that: (1) John E. James (“John James”), as then-Chief Executive Officer of RGL, directed corporate funds to Outsider PAC on November 1, 2018, and (2) that John James’ purported “involvement” in RGL’s November 1, 2018 contribution to Outsider PAC amounted to impermissible coordination.

The undisputed facts establish that RGL’s November 1, 2018 contribution to Outsider PAC was directed solely by John A. James (“Mr. James”), the Chairman and Owner of James Group International (“JGI”), which wholly owns RGL. It is also undisputed that John James had no involvement whatsoever in RGL making this contribution. Complainants’ failure and inability to rebut these facts should result in a finding that RGL did not commit any violation of the Federal Election Campaign Act (the “Act”). The Complaint should be dismissed, and the FEC should admonish Complainants for filing their frivolous and libelous Complaint against a private company.

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ANALYSIS

A. Renaissance Global Logistics, LLC and James Group International

RGL is a Detroit, Michigan-based leader in supply chain management and freight logistics.¹ Founded in 1971, RGL was built on the strong values, integrity, determination and vision of Mr. James and his uncle, Calvin Outlaw.

Since 1998, RGL has been a wholly-owned subsidiary of JGI. At the time of RGL's contribution to Outsider PAC on November 1, 2018, Mr. James was the Chairman and Owner of JGI. John James, the son of Mr. James, was employed by RGL as its Chief Executive Officer ("CEO").

B. RGL's Contribution to Outsider PAC

In 2018, John James was the Republican Party's nominee for the United States Senate in Michigan. Upon information and belief, Outsider PAC is a federal independent expenditure only committee that, in 2018, independently supported John James' bid for the United States Senate and opposed the campaign of the Democratic Party's nominee for the United States Senate in Michigan, Debbie Stabenow.

In or around late-October 2018, Mr. James spoke with a fundraiser for Outsider PAC about opportunities to donate to Outsider PAC. This conversation took place without any involvement, direction, or knowledge of John James.

As a result of the conversation between Mr. James and the fundraiser, Mr. James decided that RGL would make a \$10,000 contribution to Outsider PAC. Mr. James then directed RGL's Director of Finance, Nick Andoni, to process and provide a check to Outsider PAC in the total amount of \$10,000, which Mr. Andoni did on November 1, 2018.

As Chairman and Owner of JGI, Mr. James possessed the authority to direct that RGL make this expenditure without the need to consult with or get approval from John James. Indeed, Mr. James and John James never spoke about RGL making a contribution to Outsider PAC on November 1, 2018 or at any other time. The decision that RGL would make the November 1, 2018 contribution was made solely by Mr. James, without the knowledge, support or direction of John James.

C. Complainants Cannot Establish a Violation of the Act

The entire Complaint is built on the faulty premise that John James was personally involved in the November 1, 2018 contribution made by RGL to Outsider PAC. Yet, as the foregoing facts conclusively establish, John James had no involvement in RGL making this

¹ The factual statements set forth in this Response are supported by the Declaration of John A. James, a copy of which is attached at Exhibit A.

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contribution. The decision that RGL would make this contribution to Outsider PAC was made exclusively by Mr. James, without any direction by, or coordination with, John James. In other words, RGL's November 1, 2018 contribution to Outsider PAC was lawful and in full compliance with the Act.

Complainants have not, and cannot, show otherwise. Even the most cursory reading of the Complaint reveals that their legal theories are based on pure speculation that are not grounded in fact or reality. Their presumption that impermissible direction or coordination occurred because of John James' job title alone is insufficient to establish a violation of the Act, and the unrebutted declaration of Mr. James deals a fatal blow to their fabricated claims. The Complaint should be dismissed.

CONCLUSION

Complainants have failed to set forth a scintilla of evidence to support the hollow allegations in the Complaint. The unrebutted facts set forth in this Response, as well as the statements provided by Mr. James in the attached Declaration, conclusively establish that RGL did not commit any infraction prohibited by the Act on November 1, 2018. RGL respectfully requests that the Complaint be dismissed.

Sincerely,

CLARK HILL PLC



Brian D. Shekell

Counsel to Renaissance Global Logistics, LLC

EXHIBIT A

DECLARATION OF JOHN A. JAMES

I, John A. James, state that the following statements provided to support the response of Renaissance Global Logistics, LLC to the September 30, 2020 Complaint filed by End Citizens United PAC and Tiffany Muller, are truthful and accurate to the best of my belief and knowledge.

1. On November 1, 2018, the date which the Complaint alleges that Renaissance Global Logistics, LLC ("RGL") made the impermissible contribution to Outsider PAC, I was the Chairman and Owner of James Group International ("JGI").

2. RGL is a Detroit, Michigan-based leader in supply chain management and freight logistics. I founded RGL in 1971 with my uncle, Calvin Outlaw. Together, we built RGL based on our shared values, integrity, determination and vision.

3. Since 1998, RGL has been a wholly-owned subsidiary of JGI. At the time of RGL's contribution to Outsider PAC on November 1, 2018, I was the Chairman and Owner of JGI. John E. James, my son, was employed by RGL at that time as its Chief Executive Officer.

4. In or around late-October 2018, I spoke with a fundraiser for Outsider PAC about opportunities to donate to Outsider PAC. Upon information and belief, Outsider PAC is a federal independent expenditure only committee that, in 2018, independently supported my son's bid for the United States Senate and opposed the campaign of the Democratic Party's nominee for the United States Senate in Michigan, Debbie Stabenow.

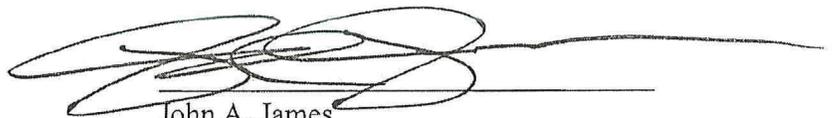
5. My conversation in late-October 2018 with a fundraiser for Outsider PAC took place without any involvement, direction, or knowledge of John E. James.

6. As a result of this conversation I decided that RGL would make a \$10,000 contribution to Outsider PAC. As Chairman and Owner of JGI, I possessed the authority to direct that RGL make this expenditure without the need to consult with or get approval from John E.

James. I then directed RGL's Director of Finance, Nick Andoni, to process and provide a check to Outsider PAC in the total amount of \$10,000, which Mr. Andoni did on November 1, 2018.

7. I never spoke ~~about~~^{to} John E. James about RGL making a contribution to Outsider PAC on November 1, 2018 or at any other time. The decision that RGL would make the November 1, 2018 contribution was made solely by myself, without the knowledge, support or direction of John E. James.

8. To the best of my knowledge and belief, John E. James had no involvement whatsoever in the decision of RGL to make a \$10,000 contribution to Outsider PAC on November 1, 2018.



John A. James
Chairman and Owner, James Group
International

Date: October 28, 2020



FEDERAL ELECTION COMMISSION
1050 First Street, NE
Washington, DC 20463

STATEMENT OF DESIGNATION OF COUNSEL

Provide one form for each Respondent/Witness

EMAIL cela@fec.gov

FAX 202-219-3923

AR/MUR/RR/P-MUR# 7808

Name of Counsel: BRIAN D. SHEKELL

Firm: CLARK HILL PLC

Address: 500 WOODWARD AVENUE, SUITE 3500 - DETROIT MI 48226

Office#: 313-965-8803 Fax#: 313-309-6833

Mobile#: _____

E-mail: bshekell@clarkhill.com

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.

10/26/2020
Date

[Signature]
(Signature - Respondent/Agent/Treasurer)

CEO
Title

Lorron James
(Name - Please Print)

RESPONDENT: Renaissance Global Logistics
(Please print Committee Name/ Company Name/Individual Named in Notification Letter)

Mailing Address: 4335 W. Fort St.
(Please Print) Detroit, Mi 48209

Home#: _____ Mobile#: _____

Office#: _____ Fax#: _____

E-mail: Lorron.James@Jamesgroupintl.com

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 under investigation.