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By OGC/CELA at 11:52 am, Feb 05, 2021

February 3, 2021

Federal Election Commission
Office of Complaints Examination
& Legal Administration
Attn: Trace Keeys, Paralegal
1050 First Street, NE
Washington, DC 200463

Via email to cela@fec.gov

RE: MUR 7816

Dear Ms. Keeys:

Please accept this response from the Center for a New American Security (CNAS) to the letter from Jeff S. Jordan, Assistant General Counsel, Complaints Examination & Legal Administration, dated October 19, 2020, regarding a complaint the FEC had received regarding Dan Feehan, who was a candidate for Congress in Minnesota. This response is being submitted before February 5, 2021, the extended deadline set by your letter to me, via email, dated January 26, 2021.

The letter from Mr. Jordan states that a complaint filed with the Federal Election Commission (FEC) indicates “Center for New American Security may have violated the Federal Election Campaign Act of 1971, as amended.” The complaint was made in relation to payments that Mr. Feehan, a veteran and former Department of Defense official who was also a former political candidate, received from several sources, including CNAS, in 2017 and 2018.

CNAS does not make political donations and does not facilitate political donations of any kind. CNAS is a non-profit research and policy institution committed to the highest standards of organizational, intellectual, and personal integrity. As such, CNAS maintains strict intellectual independence and sole editorial direction and control over its ideas, projects, publications, events, and other research activities. CNAS does not take institutional positions on policy issues and the content of CNAS publications reflects the views of their authors alone. In keeping with its mission and values, CNAS does not engage in lobbying activity and complies fully with all applicable federal, state, and local laws. CNAS does not engage in any representational activities or advocacy on behalf of any entities or interests and, to the extent that the Center accepts funding from non-U.S. sources, its activities are limited to bona fide scholastic, academic, and research-related activities, consistent with applicable federal law. The Center publicly acknowledges on its [website](#) annually all donors who contribute.

Mr. Feehan was previously an adjunct senior fellow with CNAS. Adjunct fellows at CNAS are not employees, however, some receive financial compensation as independent consultants for specific work performed as part of research related to CNAS programs or projects led by CNAS

researchers and scholars. Mr. Sheehan received financial compensation from CNAS under a consulting agreement executed in late 2017, for research and writing to be conducted under the umbrella of the CNAS Military, Veterans & Society program. Before the consulting agreement for this research and writing work was executed, a (former) CNAS program director worked with Mr. Feehan to develop a research plan proposal that included a topic and description of the research and writing that was to be conducted. Based on that research and writing plan proposal, CNAS executed a consulting agreement with Mr. Feehan for research and writing. CNAS' engagement with Mr. Feehan was solely in connection with his subject matter expertise relevant to the CNAS Military, Veterans & Society program. Mr. Feehan's professional experience included having served as Principal Deputy Assistant Secretary of Defense (Readiness), Performing the duties of the Assistant Secretary of Defense, in which role he developed and oversaw policies and programs to ensure the U.S. military was ready for all missions assigned by the President and the Secretary of Defense. Mr. Feehan had also served in the active-duty Army as an officer who deployed to Iraq in the post 9/11 era. The research plan proposal included specific anecdotes and reflections from these deployments and his ideas which were based on his experience as both a soldier and former senior Defense Department official, about the post-9/11 "forever war." Accordingly, Mr. Feehan drafted a book proposal suitable for pursuing a publication opportunity.

We hope this information is helpful in resolving this matter. If you have further questions, I can be reached at ccordero@cnas.org.

Sincerely,
/s/ Carrie Cordero
Senior Fellow & General Counsel
Center for a New American Security