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October 28, 2020

Federal Election Commission
Office of Complaints, Examination & Legal Administration
attention: Cristal Dennis, paralegal
1050 First Street, NE
Washington, DC 20463

VIA E-MAIL
To cela@fec.gov

Re: MUR 7823

Dear Ms. Dennis:

I write in response to a letter dated October 22, 2020, from Mr. Jeff S. Jordan notifying Mr. Andy Good of a complaint filed against him by Mr. Richard Webb.

I confess it is difficult to respond to Mr. Webb's complaint because I do not believe it alleges any violation of federal law. It is drafted in a manner that the nature of his complaint is difficult to determine.

Twenty-five business owners located in Hocking County, Ohio, population approximately 28,000, felt the need to express their support for the incumbent president in his reelection campaign. Mr. Good agreed to execute their plan. They pooled \$1,780 and purchased four identical billboards, one of which was depicted in Mr. Webb's complaint. As I dictate this letter, I believe the bill is yet to be paid. This effort was a one-time action. No additional monies were contemplated, nor spent, in support of President Trump's reelection bid.

If Mr. Webb's complaint is that no PAC was formed, none is required by law for the activity conducted.

If Mr. Webb's complaint concerns an allegation that the content was not true, he is simply wrong. The billboards were in fact "paid for by Hocking County business owners." They did not state paid for by "*all* Hocking County business owners." As small as our county is, it is still ridiculous to interpret "paid for by Hocking County business owners" as intending to convey that every last business owner in the county helped pay for the billboards. The local Chamber of Commerce has approximately 200 members and there are many businesses in this county that have not joined. The billboards state they were "paid for by Hocking County business owners" and that is a completely factual, true statement.

Finally, if Mr. Webb's complaint concerns the disclaimer, it read "care of Andy Good, not authorized by any candidate or candidate's committee." The Nauman sign company informed Mr.

Good that this disclaimer was in compliance with law. Mr. Good relied on that representation which we believe is legally correct. I might also add that the disclaimer was, in fact, sufficient to inform Mr. Webb as to who bore primary responsibility for the billboards.

I respectfully submit that the complaint is frivolous. There is no reason to believe that the complaint sets forth a possible violation of the Federal Election Campaign Act of 1971. Please let me know if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Will Kern", is written over a horizontal line.

Will Kern

WK/slw

C: A. Good



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# 7823

Name of Counsel: Will Kernen

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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.

<u>10/28/2020</u>		<u>Respondent</u>
Date	(Signature - Respondent/Agent/Treasurer)	Title
	<u>Andy Good</u>	
	(Name - Please Print)	

RESPONDENT: Andy Good
(Please print Committee Name/ Company Name/Individual Named in Notification Letter)

Mailing Address: 96 West Hunter St., Logan, OH 43138
(Please Print)

Home#: none Mobile#: _____

Office#: 800-423-3615 Fax#: 740-385-0474

E-mail: _____

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.