



BREITHAUPT • DUBOS • WOLLESON

A T T O R N E Y S A T L A W

P. Scott Wolleson*
 Michael L. DuBos*
 R. Alan Breithaupt*

A Louisiana Limited Liability Company
 † Licensed in Texas
 * A Professional Law Corporation

*K. Lamar Walters, III
 †James R. Close
 *Walter C. Dunn, Of Counsel

November 9, 2020

Via Email Only

Email: cela@fec.gov

Federal Election Commission
 Office of Complaints Examination
 & Legal Administration
 Attn: Trace Keeys, Paralegal
 1050 First Street, NE
 Washington, DC 20463

Re: MUR: 7824
 Complainant: Scotty Robinson
 My Client: William D. Hogan

Dear Mr. Keeys:

Please accept this on behalf of my client William D. "Bill" Hogan in response to the complaint filed by former candidate Scotty Robinson. First and foremost, Mr. Hogan denies any allegations of wrongdoing and, specifically, he denies any knowing or willful violation of the Federal Election Campaign Act of 1971.

Mr. Hogan has known Mr. Robinson, both personally and professionally, for several years. Mr. Robinson was a candidate for the U.S. House of Representatives (LA 5th Congressional District) in the just-concluded election. Mr. Robinson, whose previous political experience was as a member of the Ouachita Parish Police Jury, ran in a crowded field of nine (9) candidates. He finished the race in 5th place, garnering only 7.7% of the vote.

1811 Tower Drive, Suite D · Monroe, LA 71201 · P. O. Box 14106 (71207)
 Telephone (318) 322-1202 · Facsimile (318) 322-1984

www.bdw.law
 email: michael@bdw.law

Federal Election Commission
Office of Complaints Examination & Legal Administration
Attn: Trace Keeys, Paralegal
November 9, 2020
Page 2 of 3

From the outset of this Congressional race, Luke Letlow was the clear frontrunner and he finished the race with the highest vote total, capturing 33.1% of the vote. This is important because it frames the communications Mr. Hogan had with Mr. Robinson, which have since been grossly distorted and exploited by Mr. Robinson, both during his campaign and in his complaint to your office.

Mr. Robinson and Mr. Hogan did talk on or about September 1, 2020. In that conversation, Mr. Robinson explained to Mr. Hogan that his campaign was not gaining any momentum and that it seemed to have plateaued with very little support. Mr. Robinson also discussed the significant personal investment he made to keep his struggling campaign alive and his inability to continue to do so. Mr. Robinson raised the idea of exit strategies from the race that would assist him with his campaign debt and also allow him to maintain his ability to be a viable candidate in a future election. Mr. Hogan and Mr. Robinson then discussed how funds might be raised to retire his campaign debt and allow him to exit the race.

Mr. Robinson expressly authorized Mr. Hogan to approach others to discuss his interest in dropping out of the race if he could find a way to retire his campaign debt. Mr. Hogan contacted Adam Terry, who was not affiliated with Mr. Letlow's campaign, to discuss the fact that Mr. Robinson was considering dropping out of the race. Mr. Hogan never approached or had any communications with Mr. Letlow or anyone with his campaign about these matters.

There was never any quid-pro-quo for Mr. Robinson to drop out of the race in exchange for any favor or consideration. The idea of dropping out of the race was initiated and perpetuated by Mr. Robinson and was based on his realization that he had no chance of garnering any meaningful support in the race.

For reasons only Mr. Robinson can explain, following his communications with Mr. Hogan, he elected to misconstrue their communications and exploit them in an apparent attempt to jump start his fledgling campaign by alleging that Luke Letlow tried to "buy him out" of the race. Mr. Robinson released a video on his Facebook page (which he has apparently taken down) alleging that Mr. Letlow's campaign tried to buy him out of the race. He then took to the print media and to a local political radio talk show to push this false narrative. In his Facebook post, his interviews with print media and his radio interview, he sought to validate his allegations by disclosing that he filed a complaint with your office.

Mr. Robinson has attached to his complaint the text messages he exchanged with Mr. Hogan. These text messages do not support or validate Mr. Robinson's claims. In these messages, Mr. Hogan notes that he was not pushing Mr. Robinson to take any particular course of action. Mr. Hogan's text to Mr. Robinson to get together to "agree on what was said in [their] conversation last week" was in response to Mr. Robinson's Facebook video where he had clearly distorted their previous discussion.

Federal Election Commission
 Office of Complaints Examination & Legal Administration
 Attn: Trace Keeys, Paralegal
 November 9, 2020
 Page 3 of 3

The idea of dropping out of the race, and any ultimate decision to do so or not to do so, was and remained Mr. Robinson's. In the end, Mr. Robinson elected to stay in the race and, as he predicted to Mr. Hogan, he was not successful. What is telling is that the day following the election, Mr. Robinson changed course and he now seeks to ally himself with Mr. Letlow. This is confirmed by the following post Mr. Robinson put on his Facebook page on November 4, 2020:



Scotty Robinson is with Ashley Robinson.
20h · 

...

I just got a call from [Luke J. Letlow](#). He thanked me for running and we had a good conversation about Louisiana and what we need in the 5th district. Politics isn't personal and I appreciate the respect of his call. We have to ALL work together to move forward. Now, let's figure out who is President...


474

19 Comments

Mr. Hogan never made any offer to Mr. Robinson for him to drop out of the race. Although Mr. Hogan did discuss the possibility of working to raise funds to help retire Mr. Robinson's debt so he could exit the race on his own terms, no agreement was ever reached, and no funds were ever raised. Had Mr. Hogan moved forward and assisted Mr. Robinson with raising funds to address his campaign debt, any such initiative would have been done in strict compliance with all federal and state campaign contribution laws.

If you have any questions or wish to discuss this matter in greater detail, please do not hesitate to contact me. With kind personal regards, I am

Very truly yours,

BREITHAUPt, DUBOS & WOLLESON, LLC

/s/ Michael L. DuBos

Michael L. DuBos

MLD/tj