



201 St. Charles Avenue, Suite 3702 • New Orleans, Louisiana 70170  
Telephone: (504) 525-2200 • Facsimile: (504) 525-2205

**VIA ELECTRONIC MAIL**

11, November 2020

**FILE #2222**

Federal Election Commission  
Office of Complaints Examination  
& Legal Administration  
1050 First Street, NE  
Washington, DC 20463  
[cela@fec.gov](mailto:cela@fec.gov)

Attention Ms. Trace Keays, Paralegal

RE: MUR 7824

FEC Office of Complaints Examination & Legal Administration:

This letter is a request for an extension of time in which to respond to the complaint filed and assigned the MUR (Matter Under Review) number of 7824 with the Federal Elections Commission and forwarded to the Complaints Examination & Legal Processing ("CELA") for processing. The respondents, Mr. Scott Franklin and the Letlow for Congress 45 Campaign (respondents) request an extension of thirty (30) days in order to respond to the complaint for the below reasons.

First, Mr. Luke Letlow, since the general election that took place on November 3, 2020, has been engaged in a run-off election for the 5<sup>th</sup> Congressional District of Louisiana. Mr. Franklin, Treasurer for Mr. Letlow's campaign, and the entirety of the Letlow for Congress 45 Campaign have worked tirelessly throughout the electoral process, and now that the election has gone to a run-off, must repeat the process once again within a shorter period of time. The run-off election takes place on December 5, 2020. As of the date of this letter, a thirty (30) day extension period would allow the response to be submitted on December 10, 2020. This should provide enough time for the respondents especially considering the hectic run-off election currently taking place.

Second, Mr. Scotty Robinson waited until October 5, 2020 to send the letter alleging a violation of the Federal Election Campaign Act of 1971 (the "Act"), yet he possessed all the information and documents in the complaint on or before September 8, 2020. Additionally, Mr. Robinson's letter alleging violations of the Act, was not sworn to, which is required by the Act. Mr. Robinson further delayed this proceeding until October 20, 2020 when he finally properly notarized the letter merely two weeks before the general election on November 3, 2020. Since Mr. Robinson was able to waste time in sending the letter originally and properly the second time, the matter is clearly of no urgency to Mr. Robinson.

Third and finally, Mr. Robinson's actions, which resulted in the delay of this process, should not result in injury to Mr. Franklin and the Letlow Campaign. Mr. Robinson received notification from the FEC on October 6, 2020 of his improper submission. He then proceeded to

Federal Election Commission

11 November 2020

Page 2

wait another two weeks before correcting and then resubmitting the letter. Mr. Franklin and the Letlow Campaign received the allegation of a potential violation on October 27, 2020 which was four days before the general election on November 3, 2020. Mr. Robinson's actions, regardless of his intention, resulted in Mr. Franklin and the Letlow Campaign receiving word of the complaint just four days before the election. This greatly disadvantages the respondents based on the circumstances of the run-off election taking place and the turn around with which to produce a response. Mr. Franklin and the Letlow Campaign would have received word of the alleged violation much sooner, were it not for Mr. Robinson's actions.

It is for the reasons listed above that the respondents respectfully request an extension for a period of thirty (30) days to respond to the complaint.

Respectfully,



Stephen M. Gelé

SMG/HR/ser

Attachment – Statement of Designation of Counsel

cc: Mr. Luke J. Letlow, Via Email: [j](#)  
Mr. Andrew Bautsch, Via Email: [andrew@devisestrategy.com](mailto:andrew@devisestrategy.com)



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](mailto:cela@fec.gov)

FAX 202-219-3923

AR/MUR/RR/P-MUR# \_\_\_\_\_

Name of Counsel: \_\_\_\_\_

Firm: \_\_\_\_\_

Address: \_\_\_\_\_

Office#: \_\_\_\_\_ Fax#: \_\_\_\_\_

Mobile#: \_\_\_\_\_

E-mail: \_\_\_\_\_

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.

_____	_____	_____
Date	(Signature - Respondent/Agent/Treasurer)	Title
	<b>Luke Letlow</b>	
	_____	
	(Name - Please Print)	

## RESPONDENT:

\_\_\_\_\_  
(Please print Committee Name/ Company Name/Individual Named in Notification Letter)

Mailing Address:  
(Please Print)

Home#: \_\_\_\_\_ Mobile#: \_\_\_\_\_

Office#: \_\_\_\_\_ Fax#: \_\_\_\_\_

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.



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](mailto:cela@fec.gov)

FAX 202-219-3923

AR/MUR/RR/P-MUR# 7824

Name of Counsel: Stephen M. Gelé

Firm: Smith & Fawer, LLC

Address: 201 St. Charles Avenue, Suite 3702

New Orleans, LA 70170

Office#: (504) 525-2200 Fax#: (504) 525-2205

Mobile#: \_\_\_\_\_

E-mail: sgele@smithfawer.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.

11/17/20  
Date

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

Treasurer

Title

Scott Franklin

(Name - Please Print)

**RESPONDENT:** Letlow for Congress

(Please print Committee Name/ Company Name/Individual Named in Notification Letter)

Mailing Address: 905 Julia Street  
(Please Print)

Rayville, Louisiana 71269

Home#: \_\_\_\_\_ Mobile#: \_\_\_\_\_

Office#: \_\_\_\_\_ Fax#: \_\_\_\_\_

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.

Rev. 2018