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April 27, 2021

VIA E-MAIL

Jeff S. Jordan
Assistant General Counsel
cela@fec.gov
Federal Elections Commission
Office of Complaints Examination
& Legal Administration
1050 First Street, NE
Washington DC 20463

Re: MUR 7891

Dear Mr. Jordan:

Our office represents the Friends of Dan Feehan campaign committee and its treasurer Meghan Maes. We write in response to your March 23, 2021 letter regarding the complaint filed by Randal Schreiner. The complaint alleges that the campaign received in-kind contributions from two non-profits which allegedly paid compensation to three individuals who provided services to the campaign. The complaint which is based exclusively on the individuals' LinkedIn profiles is meritless and should be dismissed.

Monali Bahkta was an organizer with the Feehan campaign. She was hired and paid by the Minnesota Democratic-Farmer-Labor Party (the "DFL"). Ms. Bahkta's compensation was included on the DFL's reports filed with the commission and is a permissible Coordinated Party Expenditure. While she was employed by the DFL, Ms. Bahkta accepted a separate part-time position as a fellow with National Lead for America. The fact that Ms. Bahkta worked at a second, unrelated position while also working with the DFL does not give rise to a campaign finance violation.

Micah Joselow and Christina Beros were fellows with Leadership for Educational Equity ("LEE"), a non-profit leadership development organization. They chose to volunteer with the Friends of Dan Feehan to gain firsthand campaign experience. Mr. Joselow and Ms. Beros were not paid by LEE, although they received a small cost-of-living stipend from LEE. The Feehan campaign understands that LEE conferred with its counsel and confirmed that this arrangement would not result in a contribution to the campaign. The mere fact that Mr. Joselow and Ms. Beros chose to volunteer with the campaign while completing their fellowship with LEE does not result in an in-kind contribution to the campaign.

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In sum, there is no basis to conclude that the Friends of Dan Feehan campaign committee or its Treasurer violated the Federal Election Campaign Act and, therefore, the complaint should be dismissed.

Please feel free to contact me with any questions.

Thank you.

Very truly yours,

LOCKRIDGE GRINDAL NAUEN P.L.L.P.

A handwritten signature in black ink, appearing to read "CN Nauen", written in a cursive style.

Charles N. Nauen

Enclosures

c: Friends of Dan Feehan
M. Maes
D. Zoll