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April 14, 2021

Kate Sawyer Keane  
KSKeane@perkinscoie.com  
D. +1.202.434.1641  
F. +1.202.654.9111**VIA E-MAIL CELA@FEC.GOV**Jeff S. Jordan  
Assistant General Counsel  
Federal Election Commission  
Office of Complaints Examination & Legal Administration  
Attn: Christal Dennis, Paralegal  
1050 First Street, NE  
Washington, DC 20463**Re: MUR 7893**

Dear Mr. Jordan:

We write as counsel to Senator Sheldon Whitehouse and his federal campaign committee, Whitehouse for Senate (the "Committee") (collectively, "Respondents") in response to your notification of a complaint filed with the Federal Election Commission on March 25, 2021 (the "Complaint"). The Complaint alleges that a contribution that the Committee received on March 29, 2017 from Madeline Wachtel was in fact made by Ms. Wachtel's father, William Wachtel. The Complaint does not allege that Senator Whitehouse or the Committee knew of the alleged straw donor arrangement. Before receiving this Complaint, Respondents were not aware of any evidence to suggest that the contribution attributed to Ms. Wachtel was not made from her personal funds.

In February 2017, Senator Whitehouse invited Mr. Wachtel to attend a campaign fundraising event, and Mr. Wachtel responded asking to be connected with a campaign fundraiser because he wanted to raise money for the Senator's reelection campaign.<sup>1</sup> For his volunteer fundraising, the Committee provided Mr. Wachtel with an ActBlue contribution link, <https://secure.actblue.com/contribute/page/wachtel>. That link requires contributors to attest, among other things, "This contribution is made from my own funds, and funds are not being provided to me by another person or entity for the purpose of making this contribution." A screenshot of this contribution page is attached as Exhibit A.

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<sup>1</sup> The Complainant claims: "I met with US Senator Whitehouse at the Capitol along with Wachtel on December 12, 2016, at which point Wachtel offered to assist with fundraising for the senator." Complaint at 4. Senator Whitehouse has no memory of such a meeting, and a review of his official schedule from December 12, 2016 shows no meeting with Mr. Wachtel or the Complainant. Senator Whitehouse does not take fundraising meetings in his official office.

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Ms. Wachtel's March 29, 2017 contributions were made through this ActBlue link and therefore accompanied by the attestation. Because the contribution came through Mr. Wachtel's dedicated link, Committee staff thanked Mr. Wachtel for raising the contribution, and Mr. Wachtel responded: "Please tell Sheldon that she is a big fan as works for the Harbor School on Governors Island and helps lead the Billion Oyster Project." It was always Respondents' understanding that the contribution attributed to Ms. Wachtel was made from her personal funds.

Respondents do not accept contributions made in the name of another. Should the Commission determine that that has happened in this case, Respondents are prepared to refund or disgorge the contribution.

We hope that this information is helpful to you in investigating these allegations.

Very truly yours,



Kate Sawyer Keane  
Emily A. Hugin  
Counsel to Senator Whitehouse and Whitehouse for Senate

**EXHIBIT A**



## Whitehouse for Senate

Support Senator Whitehouse and his 2018 reelection campaign!

### Choose an amount:

Your contribution will benefit Sheldon Whitehouse.

\$25

\$100

\$250

\$1,000

\$

### Make it monthly!

Yes, count me in!

No, donate once

### Checkout

 Have an ActBlue Express account? [Sign in to give faster.](#)



Continue with credit or debit

#### Contribution rules

1. I am a U.S. citizen or lawfully admitted permanent resident (i.e., green card holder).

2. This contribution is made from my own funds, and funds are not being provided to me by another person or entity for the purpose of making this contribution.
3. I am at least eighteen years old.
4. I am not a federal contractor.
5. I am making this contribution with my own personal credit card and not with a corporate or business credit card or a card issued to another person.

By proceeding with this transaction, you agree to ActBlue's [terms & conditions](#).



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# 7893

Name of Counsel: Kate Sawyer Keane, Emily Hogin

Firm: Perkins Coie LLP

Address: 700 13th ST NW Suite 800

Washington DC 20005

Office#: 202-654-6200 Fax#: \_\_\_\_\_

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

E-mail: kskeane@perkinscoie.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.

4/14/21 \_\_\_\_\_ Treasurer  
Date (Signature - Respondent/Agent/Treasurer) Title

Keith D. Lowey, Treasurer  
(Name - Please Print)

Whitehouse for Senate

#### **RESPONDENT:**

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

Mailing Address: P.O. BOX 40280 PROVIDENCE, RI 02940  
(Please Print)

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

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

E-mail: lpaulson@vlpc.com

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.