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November 28, 2022

Federal Election Commission
Office of Complaint Examination
& Legal Administration
Attn: Roy Q. Lockett
1050 First Street NE
Washington, DC 20463

VIA EMAIL: cela@fec.gov.

Re: MUR 7990 Response to Second Supplemental Complaint for Kimberly Klacik and Kim Klacik for Congress.

We represent Kimberly Klacik and Kim Klacik for Congress (“KKFC”) (collectively “the Respondents”), in this matter. We have repeatedly explained to the Commission Mr. Horowitz’s and Candace Owens’ malicious and disingenuous abuse of the Commission’s complaint process through repeatedly filing the same meritless complaints under the guide of “supplements” with repetitive information. This remains theater to impact their litigation with Ms. Klacik.

Our original and supplemental response to Mr. Horowitz’s complaints remain unchanged, and properly explain why Mr. Horowitz’s allegations are based on a clear misunderstanding of campaign finance law and his failure to do sufficient research on when campaign funds can be used for campaign-related litigation. However, we want to briefly address Mr. Horowitz’s claim that Dickinson Wright PLLC provided Kim Klacik for Congress with a “loan.” That is false—as is evidenced by the fact that the amount owed to Dickinson Wright was reported as a debt, not a loan.¹ Either Mr. Horowitz is deliberately misleading the Commission or his eyesight failed him when he filed this complaint, as the line item where the debt was reported explicitly states “Excluding Loans,” negating the entire premise for his complaint “supplement” here.

We again ask for the Commission to find no reason to believe and close the file.

Sincerely,

Charlie Spies
Katie Reynolds
Counsel to Respondents

¹ October Quarterly Report, Kim Klacik for Congress, Form 3 (Oct. 15, 2022), *see also* Compl. at 24, 40.