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February 22, 2023

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](mailto:cela@fec.gov).

**Re: MUR 7990 Response to Supplemental Complaint by Dickinson Wright PLLC**

We represent Dickinson Wright PLLC (“DW”) in the above-referenced matter. We are confused by our addition as a Respondent here,<sup>1</sup> especially given that there was clearly not even an asserted violation of FECA or Commission regulations by DW. Nonetheless, we wish to address any potential concerns.

DW did not provide Kim Klacik for Congress with a “loan” for legal fees. Kim Klacik for Congress correctly reported the amount owed to DW as a debt, not a loan.<sup>2</sup> When reviewing Kim Klacik for Congress’ campaign finance report, the line item where the debt was reported explicitly states “Excluding Loans,” which nullifies the entire premise for the allegations made.

The fact DW was never named as a Respondent in this matter makes this an easy dismissal. Nonetheless, there is no legal theory by which DW has violated FECA or commission regulations. The fact that DW, a firm that regularly represents clients before the Commission, is now being considered as a Respondent solely on the basis of the complainant’s incorrect interpretation of a campaign finance report sets a terrible precedent for this agency. We trust that this practice will not continue.

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

Sincerely,

Charlie Spies  
 Counsel to Dickinson Wright PLLC

<sup>1</sup> We are notified almost three months after the Complaint was filed, and over two months after we filed a response on behalf of Kim Klacik for Congress, that DW was going to added as a Respondent. Regardless of the circumstances surrounding the delay, DW was not directly named as a Respondent in this matter.

<sup>2</sup> October Quarterly Report, Kim Klacik for Congress, Form 3 (Oct. 15, 2022), *see also* Compl. at 24, 40.