

SANDLER REIFFSANDLER REIFF LAMB
ROSENSTEIN & BIRKENSTOCK, P.C.1090 Vermont Ave NW, Suite 750
Washington, DC 20005
www.sandlerreiff.com
T: 202-479-1111

May 18, 2022

Via E-MailRoy Q. Lockett, Esq.
Acting Associate General Counsel
Federal Election Commission
1050 First Street, NE
Washington, DC 20463**Re: RR 22L-14**

Dear Mr. Lockett:

The undersigned serves as counsel to the Brady PAC and Jeanne Connelly, in her official capacity as Treasurer. We are writing in response to the Commission's letter of May 9, 2022, in connection with the above-referenced referral.

For the reasons set forth below, Brady PAC respectfully requests that the Office of General Counsel recommend that no further action be taken in this matter or, in the alternative, that this matter be referred to the Alternative Dispute Resolution Division for further proceedings.

This matter relates to a referral from the Commission's Reports Analysis Division and specifically related to voluntary amendments filed by Brady PAC with respect to a debt owed to a vendor, Mothership Strategies, in the amount of \$637,615.00.

Although Brady PAC acknowledges that it did not initially provide information regarding the debt to this vendor, this oversight was caused in large part by staff transition at the time of preparation of the report for which this debt related, as well as the disputed nature of a large portion of the debt disclosed to Mothership Strategies. A miscommunication between Brady PAC staff and the professional compliance firm retained by Brady PAC to prepare reports led to the debt being inadvertently omitted – until that omission was discovered during an internal review of the dispute between Brady PAC and Mothership.

In response to this problem, Brady PAC has taken several steps to ensure that proper communications between its staff and compliance firm include all debts owed at the conclusion of each reporting period. Other than this omission, Brady PAC has had a stellar record with respect to disclosure and takes its disclosure responsibilities very seriously.

Finally, it should be noted that Brady PAC and Mothership are currently in the process of arm's length negotiations to amicably resolve this debt and it is the expectation of Brady PAC that the amount of this debt will be decreased significantly as a result of those negotiations. Therefore, Brady PAC believes that any potential violation amount should be reduced to reflect the final debt amount, once that amount is determined.

Based upon the above, most importantly, the impressive compliance record and significant resources devoted by Brady PAC to review and improve its internal processes, as well as the disputed nature of the debt in question, the Commission should either determine to take no further action in this matter, or, in the alternative, refer this matter to its Alternative Dispute Resolution Division to work with Brady PAC to come up with comprehensive steps to ensure future compliance.

If you have any further questions, please contact us at (202) 479-1111, or at reiff@sandlerreiff.com and mitrani@sandlerreiff.com respectively.

Respectfully submitted,



Neil P. Reiff



David Mitrani

Counsel Brady PAC and Jeanne Connelly,
in her official capacity as Treasurer



FEDERAL ELECTION COMMISSION
1050 First Street, NE
Washington, DC 20463

STATEMENT OF DESIGNATION OF COUNSEL

Provide one form for each Respondent/Witness

E-MAIL: cela@fec.gov

AR/MUR/RR/P-MUR# RR 22L-14

Name of Counsel: Neil Reiff, Esq. and David Mitrani, Esq.

Firm: Sandler Reiff Lamb Rosenstein & Birkenstock, P.C.

Address: 1090 Vermont Avenue Ste 750

Washington, DC 20005

Office#: 202-479-1111

Fax#: _____

Mobile#: _____

E-mail: reiff@sandlerreiff.com, mitrani@sandlerreiff.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.

5/11/22

Date

Jeanne Connelly
(Signature - Respondent/Agent/Treasurer)

Treasurer

Title

Jeanne Connelly

(Name - Please Print)

RESPONDENT: Brady PAC / Jeanne Connelly

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

Mailing Address: 600 Pennsylvania Ave SE #15180
(Please Print)

Washington, DC 20003

Home#: _____

Mobile#: _____

Office#: _____

Fax#: _____

E-mail: info@bradypac.org, reporting@capcompliance.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.

Rev. 2021