

250 Massachusetts Ave NW, 4th Floor | Washington, DC 20001

June 1, 2023

VIA E-MAIL

Wanda Brown, Acting Assistant General Counsel
Christal Dennis, Paralegal
Federal Election Commission
Office of Complaints Examination and Legal Administration
1050 First Street, NE
Washington, DC 20463
Email: CELA@fec.gov

Re: Matter Under Review 8125 (Elias Law Group LLP)

Dear Ms. Brown:

We write on behalf of Elias Law Group LLP (the “Firm”) in response to the Complaint filed by the Committee to Defeat the President in Matter Under Review 8125.¹

The Complaint fails to allege any facts against the Firm that, if true, would constitute a violation of the Federal Election Campaign Act of 1971, as amended (the “Act”) or Federal Election Commission (“Commission”) regulations.

Commission regulations require that all complaints “contain a clear and concise recitation of the facts which describe a violation of a statute or regulation over which the Commission has jurisdiction.”² “The Commission may find ‘reason to believe’ only if a complaint sets forth sufficient specific facts, which, if proven true, would constitute a violation of the FECA.”³

The Complaint does not satisfy the basic requirements to be considered a complete and proper complaint. The Complaint’s frivolous allegations are unrooted in fact and do not describe a violation of a statute or regulation over which the Commission has jurisdiction.⁴ Because of this fatal deficiency, the Commission must immediately rescind sending the Firm the Complaint and take no further action as to the Firm.⁵ In the alternative, the Commission should find no reason to

¹ Compl., MUR 8125 (Apr. 11, 2023).

² 11 C.F.R. § 111.4(d)(3).

³ Statement of Reasons of Comm’rs Mason, Sandstrom, Smith & Thomas, Matter Under Review 4960 (Hillary Rodham Clinton for US Senate Exploratory Committee), (Dec. 21, 2000), at 7.

⁴ See 11 C.F.R. § 111.4(d)(3).

⁵ Specifically, if a complaint does not comply with the requirements of 11 C.F.R. 111.4, the “General Counsel shall so notify the complainant and any person(s) or entity(ies) identified therein as respondent(s), within the five (5) day period specified in 11 C.F.R. 111.5(a), that no action shall be taken on the basis of that complaint.” 11 C.F.R. § 111.5(b).

believe that a violation of the Act or Commission regulation has occurred, and immediately close the file in this matter.⁶

The Firm also incorporates by reference the response submitted in this matter by DCCC and Julie Merz, in her official capacity as treasurer.

Sincerely,

A handwritten signature in black ink, appearing to be "Hannah Eaves", with a long, sweeping horizontal line extending to the right.

Hannah Eaves
Rachel L. Jacobs
Jonathan A. Peterson

⁶ See Statement of Policy Regarding Commission Action in Matters at the Initial Stage in the Enforcement Process, 72 Fed. Reg. 12,545, 12,546 (Mar. 16, 2007).