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September 6, 2023

By electronic mail

Federal Election Commission
Office of Complaints Examination and
Legal Administration
Attn: Christal Dennis, Paralegal
1050 First Street, NE
Washington, D.C. 20463

Re: MUR 8148

On behalf of Leadership for Ohio Fund and its treasurer, Dustin McIntyre (together, the “Fund”), this letter responds to the Complaint implicating them in alleged violations of the Federal Election Campaign Act of 1971, as amended (the “Act”).

The Fund is not named as a Respondent in the Complaint, nor does the Complaint include any allegations that the Fund has violated the Act. Instead, the Complaint alleges that Frank LaRose, the Ohio Secretary of State, failed to timely file a Statement of Candidacy with the Commission as a candidate for the United States Senate in 2024. Uncoincidentally, the Complaint was filed on July 17, 2023, the same day that LaRose announced his candidacy and filed paperwork with the Commission.

The activities set forth in the Complaint are alleged to have occurred prior to the Fund’s registration with the Commission as an independent-expenditure only political committee on July 15, 2023. The Fund registered with the IRS as a political organization under Section 527 on March 3, 2023. Prior to registering as an IE-only committee, the Fund did not engage in any activities regulated by the Commission. More specifically, it did not solicit or receive “contributions” or make “expenditures,” as those terms are defined under the Act. It did not engage in any express advocacy in support of or opposition to any candidate for federal office. Moreover, to the Fund’s knowledge, at all times relevant to the Complaint LaRose was not acting like a candidate.

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 Act. *See* 11 CFR 111.4(d)(2); MUR 4960, Statement of Reasons of Commissioners Mason, Sandstrom, Smith and Thomas (Dec. 21, 2001). The Complaint here fails that standard, as it contains no specific facts or allegations that the Fund engaged in any activity in violation of the Act.

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September 6, 2023
Page 2 of 2

If the Commission requires any additional information or clarifications from the Fund to evaluate the allegations in this matter, please do not hesitate to contact me.

Sincerely,

LANGDON LAW LLC

A handwritten signature in blue ink, appearing to read 'D. Langdon', with a stylized flourish at the end.

David R. Langdon
Counsel for Leadership for Ohio Fund
and Dustin McIntyre