



September 2, 2023

VIA EMAIL at [cela@fec.gov](mailto:cela@fec.gov)

Wanda D. Brown  
Assistant General Counsel  
Federal Election Commission  
Complaints Examination & Legal Administration  
1050 First Street, NE  
Washington, DC 20463

**Re: MUR 8155: Response of Joe Kent for Congress et al.**

Dear Ms. Brown:

This firm represents Joe Kent for Congress and Thomas Datwyler in his official capacity as treasurer (the "Committee"), and we write in response to the complaint in MUR 8155 (the "Complaint"). The Complaint alleges that a donor named Judith Darlene Hampton made contributions to the Committee in the 2024 election cycle totaling \$14,500. To accomplish this, the Complaint alleges that Hampton made contributions under the aliases "JZ Knight" and "Judith Darlene Knight." As a result, the Complaint alleges, the Committee has violated the Federal Campaign Election Act of 1974, as amended (the "Act") by accepting excessive contributions from an individual.

The Complaint should be dismissed. First, the Committee has already refunded some excessive contributions to JZ Knight, as noted in its response to a Request for Additional Information filed on August 23, 2023. Second, prior to receipt of the Complaint, the Committee had no information to suggest that JZ Knight and Judith Darlene Knight were the same person, and the Complaint contains no information to suggest that the Committee knowingly accepted excessive contributions.

In any event, out of an abundance of caution, the Committee has refunded all contributions to JZ Knight and Judith Darlene Knight, which will be reflected on the Committee's next periodic report. We trust that this is sufficient to close the matter.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "DHR", is written over a light blue horizontal line.

Derek H. Ross  
*Counsel to Joe Kent for Congress  
and Thomas Datwyler in his official capacity*



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](mailto:cela@fec.gov)**

**AR/MUR/RR/P-MUR#** 8155

Name of Counsel: Derek Ross

Firm: Compass Legal Group

Address: 300 Independence Ave. SE

Washington, DC 20001

Office#: 202-937-2309 Fax#: \_\_\_\_\_

Mobile#: [REDACTED]

E-mail: dross@compasslegal.org

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.

<u>8/23/23</u>		<u>Treasurer</u>
Date	(Signature - Respondent/Agent/Treasurer)	Title

Thomas Datwyler  
(Name - Please Print)

**RESPONDENT:** Joe Kent for Congress and Thomas Datwyler in his official capacity as treasurer  
(Please print Committee Name/ Company Name/Individual Named in Notification Letter)

Mailing Address: Contact through counsel  
(Please Print)

Home#: \_\_\_\_\_ Mobile#: \_\_\_\_\_

Office#: \_\_\_\_\_ Fax#: \_\_\_\_\_

E-mail: \_\_\_\_\_

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.