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**CONFIDENTIAL****BY E-MAIL – cela@fec.gov**

Federal Election Commission  
Office of Complaints Examination  
& Legal Administration

Re: Additional Response of No Labels to complaint in MUR 8203

To whom it may concern:

This is to supplement the response of No Labels submitted on April 4, 2024. While that earlier response is adequate to show there had been no violation of the statute related to registering as a “political committee,” this additional submission is to clarify for the record that on April 4, 2024, No Labels ended its effort to put forth a “unity ticket” in the 2024 presidential election.<sup>1</sup> Thus, before any potential presidential candidate was selected by anyone associated with the No Labels cause and before any such potential candidate received any support from anyone associated with No Labels, No Labels announced that it would not be making any ballot access it had achieved available to any candidate in the 2024 election cycle.

This should enable the Commission to easily resolve this matter when it takes it under consideration. The whole No Labels project clearly has stopped short of the theoretical threshold set forth in the *Unity '08* decision.<sup>2</sup> And, because of this termination early in calendar year 2024, the Commission can rest assured that even under the “major purpose” test otherwise applied in “political committee” analysis, No Labels easily will establish that its major purpose spending for 2024 is for programming tied to its traditional “social welfare” functions (just as No Labels established for calendar years 2021, 2022, and 2023).<sup>3</sup>

No Labels is not going away. It has built a broad grassroots movement that reflects the

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<sup>1</sup> See No Labels Press Release, April 3, 2024, available at <https://www.nolabels.org/no-labels-2024-ballot-project>.

<sup>2</sup> See April 4 response at pp. 5-7.

<sup>3</sup> See April 4 response at pp. 7-8.

# BLANKROME

Federal Election Commission

April 16, 2024

Page 2

common-sense approach of many Americans. While its potential “unity ticket” project for 2024 is no longer being pursued, it will continue to find ways to be constructive in the policy realm.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Scott E. Thomas", with a stylized flourish at the end.

Scott E. Thomas