

March 5, 2024

**VIA E-MAIL TO CELA@FEC.GOV**

Federal Election Commission  
Office of Complaints Examination  
and Legal Administration  
1050 First Street, NE  
Washington, DC 20463

Attn: Wanda D. Brown, Assistant General Counsel

**MUR 8218: Response of Mike McCauley, in his official capacity as Treasurer, and Citizens for Nevada PAC Inc.**

To Whom It May Concern:

On behalf of myself in my official capacity as Treasurer, and Citizens for Nevada PAC Inc., I submit this response to the complaint in MUR 8218.

The complaint alleges that Citizens for Nevada PAC Inc. (the "Committee") violated federal campaign finance law. Because the complaint offers no evidence to support a violation of federal campaign finance law, we urge the Commission to dismiss the complaint and close its file in this matter.

**Fact:**

The Committee was formed on February 24, 2022 and made a single \$35,000 independent expenditure in support of Sam Brown's federal candidacy for the 2021-2022 cycle. The Committee filed for termination on January 3, 2023, is no longer in operation, and maintains no bank account.

**The Commission should dismiss the complaint because it fails to present evidence that either Citizens First Nevada, or its Treasurer, violated federal campaign finance law.**

The complaint in this matter alleges that the Committee was funded by four donors and that each donor had also contributed the maximum amount permitted by law to the campaign committee of Sam Brown. Nothing in the law prohibits a campaign donor from also contributing to a Super PAC in support of that campaign.

The complaint cites that the Committee retained the same fundraising consulting firm as the campaign. Nothing in the law prohibits a campaign and a Super PAC from retaining the same

fundraising consulting firm provided that appropriate procedures are in place. The complaint makes no allegation and indeed provides no evidence of coordination, or any other violation of campaign finance law. Commission precedent makes clear that mere speculation and inference is not a sufficient basis to find reason to believe that coordination occurred.

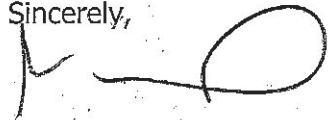
Complainant suggests that these allegations may in some way be connected to Sam Brown's current run for federal office which defies all reason. This complaint is brought against a Super PAC that made a single independent expenditure in the 2021-2022 election cycle and has been terminated for over a year.

This complaint cites no evidence to support any violation of federal campaign finance law. As such, I urge the Commission to exercise its prosecutorial discretion to dismiss the Complaint as not warranting any further use of its time and resources.

**Conclusion**

For the reasons stated above, I respectfully request the Commission to dismiss the complaint and close the file in this MUR.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike McCauley". The signature is stylized with a large, circular flourish at the end.

Mike McCauley, CPA