



ELECTIONS LLC

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June 17, 2024

**Via email at [cela@fec.gov](mailto:cela@fec.gov)**

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

RE: MUR 8251 – Response of Trump Save America Joint Fundraising Committee, Save America, Trump Make America Great Again Committee, Make America Great Again PAC

Dear Ms. Brown,

We represent Trump Save America Joint Fundraising Committee, Save America, Trump Make America Great Again Committee, Make America Great Again PAC, and Bradley Crate in his official capacity as treasurer of each of these committees (collectively, the “Committees”). On behalf of the Committees, we write in response to your letter regarding the Complaint filed in the above-listed matter, which alleges that the Committees may have violated the Federal Election Campaign Act of 1971, as amended (the “Act”), based on their reporting of payments made to their treasury services and compliance consultant, Red Curve Solutions, LLC (Red Curve), for the reimbursement of legal costs. The Complaint’s speculative allegations about these payments have no merit, and the Commission should find no reason to believe and dismiss the matter.

The payments at issue in the Complaint were all made pursuant to a contractual indemnity obligation under the Committees’ services agreements with Red Curve. The Committees understand that in recent years Red Curve and Mr. Crate (Red Curve’s Founder and President) have paid significant legal costs arising directly from their services to the Committees. Namely, the Committees understand that as a result of Mr. Crate’s designation as the FEC treasurer and custodian of records for the Committees, Mr. Crate and Red Curve have received numerous subpoenas and other requests for documents and information. In responding to those various requests, Red Curve and Mr. Crate have retained outside legal counsel to assist the response. Red Curve then requested indemnification of the costs it incurred, billing the Committees for the amounts claimed. The Committees remitted payments directly to Red Curve after assessing the indemnity requests. Mr. Crate played no role in the decision of whether Red Curve was paid.

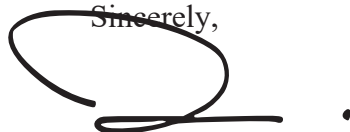
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The Committees also discretely reported those indemnification payments to Red Curve on their FEC disclosure reports, describing them as being what they were, “Reimbursements for Legal Expenses” or “Legal Fees.”

On these facts, there could not be reason to believe a violation of the Act or Commission regulations occurred. The indemnity payments to Red Curve were permissible disbursements of the Committees’ funds and reported correctly: Red Curve was the Committees’ payee, and the descriptions of the payments appropriately explained why they were made to Red Curve. The Commission thus should reject the Complaint’s false charges, find no reason to believe that a violation occurred, and dismiss this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Justin R. Clark", followed by a period.

Justin R. Clark

*Counsel to rump Save America Joint Fundraising  
Committee, Save America, rump Make America  
Great Again Committee, Make America Great Again  
AC, and Bradley Crate in his official capacity as treasurer*