

BEFORE THE FEDERAL ELECTIONS COMMISSION

**Tiffany Muller
End Citizens United
PO Box 66005
Washington, DC 20035**

Complainant,

MUR 8323

v.

**ROBERT F. KENNEDY, TEAM KENNEDY,
ELLIE COX, IMPG ADVOCATES, INC., &
PAUL A. ROSSI**

AFFIRMATIVE DEFENSE AND ANSWER OF PAUL A. ROSSI & IMPG ADVOCATES

1. Paul A. Rossi is a barred attorney in the Commonwealth of Pennsylvania with a national practice focused on the litigation of constitutional torts and election law.
2. IMPG Advocates is the legal trade name of Mr. Rossi's legal practice. Mr. Rossi is not an employee of IMPG Advocates.
3. Team Kennedy and Mr. Kennedy have not contracted for any services from IMPG Advocates.
4. The agreement for legal services is between Mr. Rossi and Team Kennedy and a separate agreement with a separate entity, not a party to this complaint, with respect to litigation related to the defense of ballot access petitions.
5. Mr. Rossi is legal counsel for Team Kennedy and Mr. Robert F. Kennedy for the purpose of ballot access legal advice and litigation defending Team Kennedy and Mr. Kennedy's ballot access petitions for the 2024 presidential general election.
6. Mr. Rossi has agreed upon a maximum per month legal fee of \$20,000.00 per month at a rate of \$110.00 per hour for ballot access legal advice.
7. Mr. Rossi has agreed upon a \$325.00 hourly rate for litigation associated with ballot access petition defense.
8. Mr. Rossi's normal billing procedure is to remit a detailed invoice for the entire legal representation at the conclusion of the subject legal representation.
9. It is the intent of Mr. Rossi to remit a detailed invoice to Team Kennedy and Mr. Kennedy no later than December 14, 2024, for the entire legal representation upon concluding of

the final litigation task associated with the 2024 presidential general election, which is due to be filed no later than December 9, 2024.

10. Mr. Rossi received legal counsel that the Federal Elections Commission allows legal counsel to volunteer their time to presidential candidates without violation of Federal Election Commission rules.

11. Further, Mr. Rossi has received legal advice that there is no specific invoicing requirement for legal counsel to presidential campaigns and that presidential campaigns are not required to report a debt unless and until they have received an invoice from a vendor.

12. Accordingly, Mr. Rossi is not required to remit an invoice for payment for legal services to Team Kennedy and/or Mr. Kennedy and Team Kennedy and Mr. Kennedy are not required to report an expense unless and until they are in receipt of a detailed invoice from a vendor requesting payment for services.

13. As soon as Mr. Rossi remits a detailed invoice requesting payment from Team Kennedy and Mr. Kennedy, the Mr. Rossi will expect payment and for the debt to be properly reported on the next campaign finance report.

Dated: December 3, 2024

/s/ Paul A. Rossi

Paul A. Rossi, Esq.

And on behalf of IMPG Advocates

316 Hill Street

Suite 1020

Mountville, PA 17554

