

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

_____	)	
CAMPAIGN LEGAL CENTER,	)	
	)	
Plaintiff,	)	Civ. No. 20-2842 (CJN)
	)	
v.	)	
	)	ANSWER
FEDERAL ELECTION COMMISSION,	)	
	)	
Defendant.	)	
_____	)	

**DEFENDANT FEDERAL ELECTION COMMISSION’S ANSWER**

Defendant Federal Election Commission (“FEC” or “Commission”) submits this answer to the Complaint for Declaratory and Injunctive Relief of plaintiff Campaign Legal Center. Any allegation not specifically responded to below is DENIED.

1. This paragraph characterizes the claims in plaintiff’s complaint, and so no response is required. To the extent a response is required, ADMIT that plaintiff’s complaint purports to assert a claim under 52 U.S.C. § 30109(a)(8)(A).

2. This paragraph contains conclusions of law, to which no response is required. To the extent the paragraph relies on unspecified “publicly available information,” the Commission is without knowledge or information sufficient to admit or deny this paragraph.

3. This paragraph contains conclusions of law, to which no response is required. To the extent the paragraph relies on unspecified “publicly available information,” the Commission is without knowledge or information sufficient to admit or deny this paragraph.

4. This paragraph contains conclusions of law, to which no response is required. To the extent the paragraph relies on unspecified “publicly available information,” the Commission is without knowledge or information sufficient to admit or deny this paragraph.

[REDACTED]

[REDACTED]

[REDACTED]

6. This paragraph contains plaintiff's characterizations of the Federal Election Campaign Act ("FECA") and the statutory provisions at 52 U.S.C. § 30109(a)(8)(C), which speak for themselves, and so no response is required.

7. [REDACTED]

[REDACTED]

[REDACTED] The second sentence of this paragraph contains plaintiff's characterization of its own litigation complaint, to which no response is required. To the extent this paragraph requests judicial relief, that relief should be denied.

8. ADMIT.

9. ADMIT.

10. The Commission is without knowledge or information sufficient to admit or deny this paragraph.

11. ADMIT that plaintiff has filed administrative complaints and participated in rulemaking and advisory opinion proceedings before the FEC. The Commission is without knowledge or information sufficient to admit or deny the remainder of this paragraph.

12. The Commission is without knowledge or information sufficient to admit or deny the first sentence of this paragraph. The Commission is also without knowledge or information sufficient to admit or deny the second sentence of this paragraph, including whether there is any information subject to mandatory disclosure under FECA that is not publicly available. To the

extent this paragraph alleges that the FEC has not made required information publicly available, the second sentence of this paragraph is DENIED.

13. The Commission is without knowledge or information sufficient to admit or deny this paragraph.

14. The Commission is without knowledge or information sufficient to admit or deny this paragraph.

15. ADMIT.

16. This paragraph quotes FECA, which speaks for itself, and so no response is required. To the extent a response is required, ADMIT that FECA contains the quoted text.

17. This paragraph characterizes FEC regulations, which speak for themselves, and so no response is required. To the extent a response is required, ADMIT that this paragraph accurately quotes the cited FEC regulation.

18. This paragraph and its accompanying footnote characterize the purpose of a federal statute and judicial opinion, which speak for themselves, and so no response is required.

19. This paragraph contains plaintiff's characterization of a Statement of Reasons issued by former Commissioners Matthew S. Petersen, Caroline C. Hunter, and Lee E. Goodman, which speaks for itself and so no response is required. To the extent a response is required, ADMIT that those Commissioners issued a Statement of Reasons on April 1, 2016 in MURs 6485, 6487, 6488, 6711, and 6930 and that the quoted language in this paragraph from that Statement of Reasons is accurate.

20. This paragraph quotes FECA, which speaks for itself, and so no response is required. To the extent a response is required, ADMIT that FECA contains the quoted text, but DENY that this paragraph sets forth all the requirements for a political committee to exist.

21. This paragraph purports to describe the legal requirements for determining whether a group is a political committee based on Supreme Court judicial opinions, which are legal conclusions, and so no response is required. To the extent a response is required ADMIT that the Supreme Court adopted a “major purpose” requirement for certain organizations but DENY that this paragraph sets forth a complete description of that analysis.

22. This paragraph quotes the Political Committee Status Supplemental Explanation and Justification, 72 Fed. Reg. 5595 (Feb. 7, 2007), which speaks for itself, and so no response is required. To the extent a response is required, ADMIT that the quoted language appears in the cited Explanation and Justification, but DENY that this paragraph sets forth the complete analysis.

23. This paragraph contains plaintiff’s characterizations of applicable law, to which no response is required.

24. This paragraph contains plaintiff’s descriptions of certain provisions of FECA, which speak for themselves, and so no response is required. To the extent a response is required, ADMIT that FECA and FEC regulations require groups meeting the definition of “political committee” to file a statement of organization, file periodic reports with the FEC, and meet other organizational requirements.

25. This paragraph contains plaintiff’s characterizations of judicial opinions, which speak for themselves, and so no response is required. To the extent a response is required, ADMIT that the case quotations in this paragraph are accurate.

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27. ADMIT that 1820 PAC has registered with the FEC as an independent expenditure-only political committee, and that 1820 PAC reported receiving the contribution

from SYWSE as described in this paragraph. The FEC is without sufficient information to admit or deny the remaining allegations in this paragraph.

28. The first sentence of this paragraph contains plaintiff’s characterization of the availability of information about SYWSE, and so no response is required. [REDACTED]

[REDACTED]

[REDACTED] To the extent a response is required, DENY.

29. This paragraph contains plaintiff’s legal argument, and so no response is required.

30. This paragraph contains plaintiff’s legal argument, and so no response is required. [REDACTED]

[REDACTED]

[REDACTED]

31. This paragraph contains plaintiff’s legal conclusions, to which no response is required.

32. This paragraph contains plaintiff’s legal conclusions, to which no response is required.

33. This paragraph contains plaintiff’s legal conclusions, to which no response is required.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

37. This paragraph re-alleges and incorporates by reference the allegations contained in paragraphs 1-36 of plaintiff's complaint, and the Commission therefore incorporates by reference its responses to those paragraphs.

38. DENY.

Plaintiff is not entitled to the relief requested in the "Requested Relief" portion of the complaint or to any other relief.

Respectfully submitted,

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