

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

_____	)	
CENTER FOR PUBLIC INTEGRITY,	)	
	)	
Plaintiff,	)	Civ. No. 17-1162 (CRC)
	)	
v.	)	
	)	
FEDERAL ELECTION COMMISSION,	)	ANSWER
	)	
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 filed by plaintiff Center for Public Integrity. Any allegation not specifically responded to below is DENIED.

1. This paragraph summarizes plaintiffs’ complaint, the allegations of which speak for themselves, and requires no response. To the extent a response is required, ADMIT that this case is an action under the Freedom of Information Act (“FOIA”) to compel the production of certain agency records.

2. ADMIT that the Court has jurisdiction pursuant to 5 U.S.C. § 552(a)(4)(B) and 28 U.S.C. § 1331. DENY that 28 U.S.C. § 2201(a) grants the Court jurisdiction.

3. ADMIT.

4. ADMIT that plaintiff is the requester of the records at issue in this case. The Commission is otherwise without knowledge or information sufficient to admit or deny the allegations in this paragraph.

5. ADMIT the first sentence on this paragraph. ADMIT the Commission is in possession of certain records referenced in paragraphs 6 and 11 of plaintiff's complaint, but DENY that the Commission has exclusive possession and control over all of those records at this time.

6. This paragraph describes the first FOIA request at issue in this case, which speaks for itself, and requires no response. To the extent a response is required, ADMIT that plaintiff submitted a FOIA request on February 1, 2017, and that the request contained the language quoted in this paragraph.

7. ADMIT.

8. ADMIT.

9. ADMIT.

10. This paragraph contains plaintiff's legal conclusion, to which no response is required. To the extent a response is required, DENY.

11. This paragraph describes the second FOIA request at issue in this case, which speaks for itself, and requires no response. To the extent a response is required, ADMIT that plaintiff submitted a FOIA request on February 6, 2017, and that the request contained the language quoted in this paragraph.

12. ADMIT.

13. ADMIT.

14. ADMIT the first sentence of this paragraph. The remainder of this paragraph is a legal conclusion and does not require a response.

15. This paragraph contains plaintiff's legal conclusion, to which no response is required. To the extent a response is required, DENY that plaintiffs have an immediate right to

all of the requested records. DENY that there is no legal basis for the Commission not making all of the requested records available at this time.

**REQUESTED RELIEF**

The Court should deny plaintiff's requested relief.

Respectfully submitted,

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/s/ Seth Nesin

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