



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 21 2012

VIA FIRST CLASS MAIL

Carol A. Laham
Wiley Rein LLP
1776 K Street, NW
Washington, DC 20006

RE: MUR 6537
Club for Growth PAC
Adam Rozansky, Treasurer

Dear Ms. Laham:

On March 7, 2012, the Federal Election Commission notified your clients of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

On December 12, 2012, the Commission found, on the basis of the information in the complaint, and information provided by your clients that there is no reason to believe Club for Growth PAC and Adam Rozansky in his official capacity as treasurer violated the Federal Election Campaign Act of 1971. Accordingly, the Commission closed its file in this matter.

Documents related to the case will be placed on the public record within 30 days. See Statement of Policy Regarding Disclosure of Closed Enforcement and Related Files, 68 Fed. Reg. 70,426 (Dec. 18, 2003).

If you have any questions, please contact Kim Collins, the paralegal assigned to this matter at (202) 694-1650.

Sincerely,

Anthony Herman
General Counsel

BY: Jeff S. Jordan
Supervisory Attorney
Complaints Examination and
Legal Administration

Enclosure
Factual and Legal Analysis

13044330161

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

**RESPONDENTS: Club for Growth Political Action Committee
Adam Rozansky in his official capacity as treasurer**

MUR 6537

This matter was generated by a Complaint filed by Richard J. McDaniel alleging violations of the Federal Election Campaign Act of 1971, as amended (the "Act"). It was scored as a low-rated matter under the Enforcement Priority System, a system by which the Federal Election Commission ("Commission") uses formal scoring criteria as a basis to allocate its resources and decide which matters to pursue.

The Complainant alleges that Jeff Flake for U.S. Senate, Inc. and Hieu Tran in her official capacity as treasurer violated the Act in connection with "numerous 'earmarked' contributions received from an organization known as the Club for Growth." Compl. at 1. Based on information obtained by the Commission, including information provided by the Club for Growth, there is no reason to believe that Club for Growth Political Action Committee and Adam Rozansky in his official capacity as treasurer violated the Act.

13044330162