

2015 JUN 19 PM 8:27

Alexandra A.E. Shapiro  
ashapiro@shapiroarato.com  
Direct: 212-257-4881

OFFICE

June 18, 2015

VIA HAND DELIVERY

Office of the General Counsel  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

MUR # 6942

Re: MUR 6869, In the Matter of the Commission on Presidential Debates, *et al.*

To Whom It May Concern:

We represent the Libertarian National Committee, Inc., which controls and manages the affairs of the United States Libertarian Party (the "Libertarian Party"). On its behalf, we respectfully request to join the Complaint against the Commission on Presidential Debates and certain of its directors, filed on behalf of Level the Playing Field and Peter Ackerman In the Matter of the Commission on Presidential Debates, *et al.*, MUR 6869. The Libertarian Party shares the views of Level the Playing Field and Dr. Ackerman that the Commission on Presidential Debates ("CPD") and certain of its directors (the "Named Directors") have violated the Federal Election Campaign Act and the Commission's regulations in connection with the CPD's hosting of general election presidential debates.

The Libertarian Party asserts no new allegations, and instead incorporates fully the allegations against the CPD and the Named Directors set forth in the Complaint in MUR 6869. Accordingly, the Commission should permit the Libertarian Party to join the Complaint in MUR 6869 rather than initiating a new MUR and treating the Libertarian Party's request to join as a new administrative complaint.

With this letter, please find one original and three copies of the Libertarian Party's Complaint and Request to Join Complaint in MUR 6869, as well as four copies of the Complaint in MUR 6869 and its two accompanying volumes of exhibits, and a DVD containing electronic copies of these documents.

Please contact me if the Commission has any questions or needs additional information. We hope that the Commission will move expeditiously to address our request to join the Complaint, as well as to address the matters raised in the Complaint.

Alameda A. S.

cc: Kim Collins, Office of Complaints Examination and Legal Administration (via e-mail)

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Commission on Presidential Debates,  
Frank Fahrenkopf, Jr., Michael D. McCurry,  
Howard G. Buffett, John C. Danforth,  
John Griffen, Antonia Hernandez,  
John I. Jenkins, Newton N. Minow,  
Richard D. Parsons, Dorothy Ridings,  
Alan K. Simpson, and Janet Brown

OFFICE OF THE  
CLERK

2015 JUL 19 11:56:27

FEDERAL ELECTION COMMISSION  
CLERK

MUR # 6942

REQUEST TO JOIN COMPLAINT IN MUR 6869 OR COMPLAINT

SHAPIRO ARATO LLP  
500 Fifth Avenue  
40th Floor  
New York, New York 10110  
Phone: (212) 257-4880  
Fax: (212) 202-6417

*Attorneys for Complainant Libertarian National  
Committee, Inc.*

11034743840000

1  
5  
0  
4  
4  
3  
8  
4  
2  
5  
3

Complainant Libertarian National Committee, Inc., which controls and manages the affairs of the United States Libertarian Party (the "Libertarian Party"), joins the Complaint of Level the Playing Field and Peter Ackerman filed before the Federal Election Commission In the Matter of Commission on Presidential Debates, *et al.*, MUR 6869 (the "Complaint"). The Libertarian Party shares the views of Level the Playing Field and Dr. Ackerman that the Commission on Presidential Debates ("CPD") and certain of its directors, in connection with their hosting of general election presidential debates, have violated the Federal Election Campaign Act and the regulations of the Federal Election Commission, for the reasons set forth in detail in the Complaint, which are incorporated by reference as if fully set forth herein. *See* 52 U.S.C. §§ 30118(a), 30116(f), 30103, 30104; 11 C.F.R. § 110.13.

The Libertarian Party is the third largest political party in the country. Its address is 1444 Duke Street, Alexandria, VA 22314.

Founded in 1971, the Libertarian Party has nominated presidential candidates during every presidential election since its formation, including Ed Clark in 1980, who appeared on the ballot of all 50 states and the District of Columbia; David Bergland in 1984, who received the third greatest number of votes in the presidential election; Ron Paul in 1988, who was on the ballot in 46 states and the District of Columbia and received the third most votes in the presidential election; Andre Marrou in 1992, who was on the ballot of every state and the District of Columbia; Harry Browne in 1996, who was on the ballot of every state and the District of Columbia – the first time in United States history a "third party" earned ballot status in all 50 states and the District of Columbia for a second consecutive time; Harry Browne again in 2000, who headed a ticket of 1,436 Libertarian Party candidates, including 256 candidates for the U.S.

House of Representatives; Michael Badnarik in 2004, who was on the ballot in 48 states; Bob Barr in 2008, who led a ticket in an election in which fifty Libertarians were elected or re-elected; and Gary Johnson in 2012, who received 1,275,951 votes, in an election during which six of the Libertarian Party candidates for office also received a total of over one million votes. Libertarian Party presidential candidates, including Governor Johnson in 2012, have been excluded from all general election presidential debates since the CPD adopted the selection criteria challenged in the Complaint.

For the reasons set forth in the Complaint of Level the Playing Field and Peter Ackerman In the Matter of the Commission on Presidential Debates, *et al.*, MUR 6869, the Libertarian Party respectfully requests that the FEC find the CPD and its directors have violated the Federal Election Campaign Act and the regulations of the Federal Election Commission, and grant the relief sought in the Complaint.

Dated this 18th day of June, 2015.

Respectfully submitted,

Robert C.W. Benedict, Jr.

Libertarian National Committee, Inc.

By: Robert C.W. Benedict, Jr., Executive Director

Signed and sworn to before me this 18 day of June, 2015

[Signature]

Notary Public

7514213

06 '30' 16

