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June 17, 2020

CONFIDENTIAL  
COMMUNICATION

**VIA E-MAIL TO CELA@FEC.GOV**

Federal Election Commission  
Office of Complaints Examination & Legal Administration  
Attn: Christal Dennis, Paralegal  
1050 First Street, N.E.  
Washington, DC 20463

Re: Matters Under Review 7645, 7663, 7705

Dear Office of Complaints Examination &amp; Legal Administration:

Enclosed please find a collective response to the Complaints in the above-captioned MURs on behalf of Donald J. Trump for President, Inc. and Treasurer Bradley T. Crate.

Very truly yours,

/s/ E. Stewart Crosland

E. Stewart Crosland

Enclosure

## BEFORE THE FEDERAL ELECTION COMMISSION

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 )      **MURs 7645/7663/7705**  
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**RESPONSE OF DONALD J. TRUMP FOR PRESIDENT, INC. AND  
TREASURER BRADLEY T. CRATE TO THE COMPLAINTS**

The Complaints against Donald J. Trump for President, Inc. and Treasurer Bradley T. Crate (collectively, the “Campaign”) in the above-referenced MURs do not recite any facts that constitute a violation of federal campaign finance law and must be dismissed as to the Campaign.<sup>1</sup>

The allegations in these MURs already have been thoroughly, and publicly, reviewed by the Department of Justice and both houses of Congress. None of them found any reason to conclude there had been a violation of federal campaign finance law—because there is none. *See, e.g., Mairead McArdle, DOJ Declined to Investigate Trump Ukraine Call, Found No Campaign Finance Violation*, Nat’l Review (Sept. 25, 2019), <https://www.nationalreview.com/news/doj-declined-to-investigate-trump-ukraine-call-found-no-campaign-finance-violation> (“Relying on established procedures set forth in the Justice Manual, the [Department of Justice’s] Criminal Division reviewed the official record of the call and determined, *based on the facts and applicable law, that there was no campaign finance violation.*” (emphasis added) (quoting DOJ spokesperson)). Indeed, the Complaints do not cite a single judicial or FEC precedent that supports their overly broad theory of what constitutes a “solicitation” of a “thing of value.” To the contrary, the legal and constitutional viability of such claims was directly called into doubt by Special Counsel Robert Mueller in his *Report on the Investigation Into Russian Interference In The 2016*

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<sup>1</sup> The Campaign submits this collective response to all three Complaints in the above-referenced MURs because they appear to raise common questions of law and fact.

*Presidential Election. See Robert S. Mueller III, Report on the Investigation Into Russian Interference In The 2016 Presidential Election Vol. I at 187.*

Simply put, there is no basis for the Commission to find reason to believe that the Complaints in these MURs describe any violation of federal campaign finance law, and these matters should be dismissed as to the Campaign.