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March 18, 2013

Via Fax (202) 219-3923 and First Class Mail

Jeff S. Jordan, Esq.
Supervisory Attorney
Complaints Examination & Legal
Administration
FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Re: MUR 6576

Dear Mr. Jordan:

We represent Rebecca Grant Cummiskey and her company, RGC Consulting, LLC, in this matter. This letter responds to your letter to her dated January 7, 2013.

As an initial matter, your letter contains the following statement: "Under the Act you have the opportunity to demonstrate in writing that no action should be taken against and you, as treasurer, in this matter." Mrs. Cummiskey is not now, and has never been, treasurer of the "Wright McLeod for Congress campaign" in this matter.

She was, however, a campaign finance consultant to the campaign. At no time did she or her company violate 11 C.F.R. § 104.15 or 2 U.S.C. § 438(a)(4) as the complaint alleges.

The addresses on the fundraising solicitations to which the complaint refers are easily explained and were *not* obtained in violation of 11 C.F.R. § 104.15, which only prohibits the use of information "copied, or otherwise obtained, from any report or statement, or any copy, reproduction, or publication thereof, filed under the [Federal Election Campaign] Act". Mrs. Cummiskey has worked on numerous campaigns over the past twelve years as a political fundraiser. During that time, she has built a large database containing approximately 30,000 contacts throughout the state of Georgia. The contact information in her database has come through a variety of sources, largely from direct donations to campaigns on which she has worked previously. In addition, when working with fundraising committees and event hosts, she and the committee pore through rolodexes, chamber of commerce directories, association

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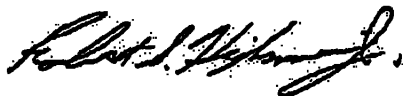
membership directories, and other appropriate resources to brainstorm on new contributor prospects.

For the Wright McLeod for Congress campaign, she provided call lists and mail lists for various events. These lists were derived exclusively from her database. At no time did she download, copy, or otherwise obtain contributor addresses from any FECA filing.

We trust this information will be helpful as you review this matter. Please let me know if we can provide any further information.

Sincerely yours,

HOLLAND & KNIGHT LLP



Robert S. Highsmith Jr.

RSH:cap