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April 27, 2010

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Jeff S. Jordan, Esquire
Supervisory Attorney
Complaints Examination & Legal Administration
Federal Election Commission
999 E Street N.W.
Washington DC 20463

Re: MUR - 6253

Dear Mr. Jordan:

Thank you for your letter of April 22, 2010, forwarding a copy of Jeffrey J. Parker's April 12, 2010 letter to the Commission. The purpose of this letter is to respond briefly to Mr. Parker's latest submission and to supplement my previous correspondence to you.

First, the complaints filed by Mr. Parker, Representative Rob Inglis's campaign treasurer, are clearly politically motivated. Mr. Parker's state and federal complaints were filed to generate media interest and to force Mr. Gowdy to respond to media inquiries. This is evidenced by the fact that the Inglis campaign breached the confidentiality requirements of South Carolina law by leaking the state complaint to the media in violation of S.C. Code Section 8-13-320(10)(g).^[i] Of course, the State Ethics Commission, after investigation, dismissed Mr. Parker's complaint because there was no evidence to support his allegations.^[ii]

Second, in the instant matter, the same political tactics are on display - baseless allegations are made to the Commission without any evidentiary support and then public comments are made by Representative Inglis characterizing the allegations as fact and questioning Mr. Gowdy's ethics. There is no new substance in Mr. Parker's April 12 letter other than his attempt to relay a conversation he claims to have had with the Executive Director of the State Ethics Commission. Assuming *arguendo* the accuracy of Mr. Parker's account of the alleged conversation, it establishes nothing. The timing of Mr. Gowdy's decision making process is irrelevant. Mr. Gowdy's term as Solicitor does not expire until 2012, and the timing of a decision whether to seek reelection bears no connection to his responsibilities under the Federal Election Campaign Act. Put simply, Mr. Parker's allegations, even if they were accurate, do not provide any evidence of a FECA violation.

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Given the continued manipulation by the Inglis campaign of the FEC's complaint process, we would greatly appreciate expedited handling of this matter. We stand ready, willing and able to provide whatever information you might need to rebut any of the allegations made by Mr. Parker or Representative Inglis. Thank you in advance for your assistance.

With kind regards, I remain,

Sincerely yours,



Kevin A. Hall

KAH/dj

^[1] See Robert W. Dalton, Spartanburg Herald Journal, February 22, 2010, a copy of which has been previously submitted to the Commission.

^[2] See Decision and Order of the South Carolina Ethics Commission regarding Complaint No. C2010 - 095, dated March 24, 2010, a copy of which has been previously submitted to the Commission.

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