

JONES DAY

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February 5, 2021

CONFIDENTIAL

VIA E-MAIL TO CELA@FEC.GOV

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

Re: Matter Under Review 7147

Dear Office of Complaints Examination & Legal Administration:

On behalf of Donald J. Trump for President, Inc. and Treasurer Bradley T. Crate, enclosed is a response to the supplemental complaint in the above-referenced MUR.

Regards,

/s/ E. Stewart Crosland

E. Stewart Crosland

Enclosure

BEFORE THE FEDERAL ELECTION COMMISSION

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) MUR 7147
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**SUPPLEMENTAL RESPONSE OF RESPONDENTS DONALD J. TRUMP FOR
PRESIDENT, INC. AND BRADLEY T. CRATE, AS TREASURER**

Complainant Campaign Legal Center (“CLC”), in what is now its third supplemental complaint in this MUR, claims to offer new “evidence” that a Super PAC called Make America Number 1 (“MAN1”) may have coordinated with Donald J. Trump for President, Inc. (the “Campaign”) through Cambridge Analytica, a common vendor. Yet CLC’s newest filing falls flat—again. CLC once more presents no information indicating that Cambridge Analytica ignored its own firewall policy and used or shared the Campaign’s private “plans, projects, activities or needs” violation of 11 C.F.R. § 109.21(d)(4).¹ The mere use of a common vendor is not coordination. 11 C.F.R. § 109.21(d)(4)(iii); Explanation & Justification, *Coordinated and Independent Expenditures*, 68 Fed. Reg. 421, 436 (Jan. 3, 2003).

CLC’s speculative coordination theories have been asked and answered by Respondents—now *three* times. See Original Response at 12; Suppl. Response at 2. After almost five years, there remains no reason to believe that coordination occurred between the Campaign and MAN1 through Cambridge Analytica. The Commission should, at long last, dismiss Respondents and bring this matter to a close.

¹ Despite CLC’s tortured efforts to suggest otherwise, the information presented in the newest supplement—some emails relating to a different campaign committee; a purported Cambridge Analytica project calendar containing no private campaign information; a post-election email in which one person apparently confused client projects; and digital ads that (to no one’s surprise) similarly portrayed Hillary Clinton as a “liar” or “corrupt” in the lead up to the 2016 presidential election—falls far short of showing coordination.