



INTERNATIONAL SQUARE
1825 EYE STREET, NW, SUITE 900
WASHINGTON, DC 20006-5468
TELEPHONE: 202-457-0160
FACSIMILE: 844-670-6009
<http://www.dickinsonwright.com>

CHARLES SPIES
Cspies@dickinsonwright.com
202-466-5964

December 13, 2023

Roy Lockett, Esq.
Assistant General Counsel
Complaints Examination & Legal Administration
Federal Election Commission
1050 First Street NE Washington, DC 20463

VIA E-MAIL: cela@fec.gov

Re: MUR 8110: Supplemental Response for Georgia Action Fund

We write on behalf of Georgia Action Fund and Kayla Glaze, in her official capacity as Treasurer (collectively, the “Respondents”), in response to the amended complaint (“Amended Complaint”) filed by Citizens for Responsibility and Ethics in Washington (“Complainant”) on November 14, 2023.

The Amended Complaint fails to cure the defects of the initial Complaint. Instead, the Complainant simply expands its elaborate conspiracy theory, asserting that the Respondents somehow had knowledge of a mystery donor to an unrelated entity and consequently failed to properly disclose the “true source” of a contribution from RightOn Issues. As explained in our initial response, the Commission should promptly dismiss this matter as it relates to Respondents here because it fails to provide the facts necessary to meet any standard needed to warrant an investigation that the Respondents “knowingly” accepted a contribution in the name of another.

The Amended Complaint – as did the initial Complaint – fails to provide any evidence indicating that Respondents had knowledge of the donations to PSAA or ACCP, the donations to RightOn Issues from PSAA or ACCP, or generally any knowledge of the political activity of PSAA or ACCP. In short, the Amended Complaint is heavy on innuendo and worst-case assumptions, and light on (ok, totally devoid of) evidence of wrongdoing by the Respondent.

Respondents permissibly accepted a contribution from RightOn Issues (which made up a small portion of the \$5,000,000 raised by the Georgia Action Fund in the 2020 cycle) and properly disclosed the contribution in compliance with the law and Commission guidance. There was and still is nothing improper or even on its face suspicious about the contribution received by Georgia Action Fund.

Page 2

We respectfully urge the Commission to promptly dismiss this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Charlie Spies". The signature is fluid and cursive, with the first name "Charlie" being more prominent than the last name "Spies".

Charlie Spies
Benjamin Mehr
Counsel to Georgia Action Fund and Kayla Glaze