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Strategic alliance with MWE China Law Offices (Shanghai)

Stephen M. Ryan
Attorney at Law
sryan@mwe.com
+1 202 756 8333

February 8, 2018

VIA E-MAIL

Federal Election Commission
Office of Complaints Examination
and Legal Administration
Attn: Christal Dennis, Paralegal
999 E Street, N.W.
Washington, D.C. 20463

HIGHLY CONFIDENTIAL

Re: MUR 7313

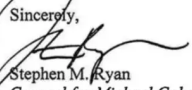
Dear Mr. Jordan:

I am writing on behalf of my client, Michael D. Cohen, in response to your letter dated, January 30, 2018. Specifically, this letter responds to the complaint numbered MUR 7313, which was filed with the Federal Election Commission (FEC) by Common Cause and Paul S. Ryan.

In a private transaction in 2016, before the U.S. presidential election, Mr. Cohen used his own personal funds to facilitate a payment of \$130,000 to Ms. Stephanie Clifford. Neither the Trump Organization nor the Trump campaign was a party to the transaction with Ms. Clifford, and neither reimbursed Mr. Cohen for the payment directly or indirectly.

Contrary to the allegations in the complaint, which are entirely speculative, neither Mr. Cohen nor Essential Consultants LLC made any in-kind contributions to Donald J. Trump for President, Inc., or any other presidential campaign committee. Mr. Cohen has not been a government employee during any of the relevant time period. The payment in question does not constitute a campaign contribution or expenditure and, therefore, the FEC lacks jurisdiction over this matter. The complainants have not and cannot present any evidence to the contrary. Accordingly, the complaint should be dismissed.

Please contact me at your earliest convenience at (202) 756-8333 if you have any questions regarding this letter.

Sincerely,

Stephen M. Ryan
Counsel for Michael Cohen

U.S. practice conducted through McDermott Will & Emery LLP.
500 North Capitol Street, NW | Washington, DC 20001-1531 | Tel: +1 202 756 8000 | Fax: +1 202 756 8087 | www.mwe.com

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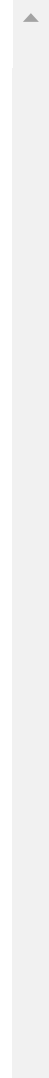
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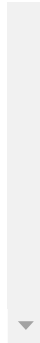
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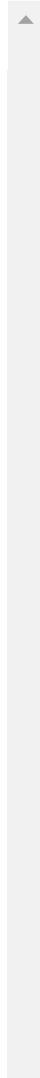
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