July 30, 2018

Office of General Counsel Federal Election Commission 1050 First Street, NE Washington, DC 20463 GENERAL COUNSEL

RE: MUR # 7431 - Response

Dear Commissioners:

We received a copy of the above referenced claim. There is no legitimate basis for this claim.

Under 52 U.S.C.A. § 30101(9)(B)(i) (exempting costs associated with producing news from the definition of "expenditure"): "The term "expenditure" does not include— (i) any news story, commentary, or editorial distributed through the facilities of any broadcasting station, newspaper, magazine, or other periodical publication, unless such facilities are owned or controlled by any political party, political committee, or candidate;"

We are a non-profit online newspaper focused on civic issues in Hawaii. In June we asked candidates running for office in Hawaii (roughly 275 people) to fill out questionnaires that we could publish so our readers could be better informed. Each day we publish approximately six of these completed questionnaires so readers are not overwhelmed by the number of articles posted by us on any single day.

We have no specific opinion or bias regarding the complainant's candidacy.

Please let us know if there is any other information you require from us.



Sincerely,

Patti Epler

Editor and General Manager

Honolulu Civil Beat