

**BEFORE THE  
KENTUCKY REGISTRY OF ELECTION FINANCE  
CASE NO. 2011-203**

CURTIS L. MORRISON

COMPLAINANT

v. NOTICE OF ENTRY OF APPEARANCE OF JENNIFER A. MOORE ON BEHALF OF RESPONDENTS, CAMPAIGN FUND OF GREG FISCHER FOR MAYOR OF LOUISVILLE METRO GOVERNMENT, JON A. MEYER, TREASURER; GREG FISCHER MAYORAL INAUGURATION COMMITTEE, CHRISTY BROWN, CHAIRPERSON, JON A. MEYER, TREASURER; ICEBERG VENTURES, LLC; AND GREG FISCHER, AS CANDIDATE FOR MAYOR OF LOUISVILLE METRO GOVERNMENT AND MEMBER OF ICEBERG VENTURES, LLC

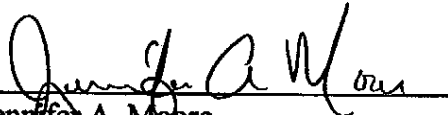
CAMPAIGN FUND OF GREG FISCHER FOR  
MAYOR OF LOUISVILLE METRO  
GOVERNMENT, JON A. MEYER, TREASURER;  
GREG FISCHER MAYORAL INAUGURATION  
COMMITTEE, CHRISTY BROWN, CHAIRPERSON,  
JON A. MEYER, TREASURER; ICEBERG  
VENTURES, LLC; AND GREG FISCHER, AS  
CANDIDATE FOR MAYOR OF LOUISVILLE  
METRO GOVERNMENT AND MEMBER OF  
ICEBERG VENTURES, LLC

RESPONDENTS

\*\*\*\*\*

Notice is hereby given that Jennifer A. Moore of the law firm Grossman & Moore, PLLC, 401 W. Main Street, Suite 1810, Louisville, Kentucky 40202, (502) 657-7100, enters her appearance as counsel for Respondents, Campaign Fund of Greg Fischer for Mayor of Louisville Metro Government, Jon A. Meyer, Treasurer; Greg Fischer Mayoral Inauguration Committee, Christy Brown, Chairperson, Jon A. Meyer, Treasurer; Iceberg Ventures, LLC; and Greg Fischer, as Candidate for Mayor of Louisville Metro Government and Member of Iceberg Ventures, LLC.

Respectfully submitted,



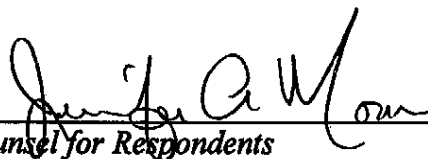
Jennifer A. Moore  
GROSSMAN & MOORE, PLLC  
401 W. Main Street, Suite 1810  
Louisville, KY 40202  
(502) 657-7100  
(502) 657-7120 (facsimile)  
[jmoore@gminjurylaw.com](mailto:jmoore@gminjurylaw.com)

*Counsel for Respondents, Campaign Fund of Greg Fischer for Mayor of Louisville Metro Government, Jon A. Meyer, Treasurer; Greg Fischer Mayoral Inauguration Committee, Christy Brown, Chairperson, Jon A. Meyer, Treasurer; Iceberg Ventures, LLC; and Greg Fischer, as Candidate for Mayor of Louisville Metro Government and Member of Iceberg Ventures, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and accurate copy of the foregoing has been served by U.S. Mail, postage pre-paid, on this 12<sup>th</sup> day of January, 2012 to the following individuals:

Curtis L. Morrison  
P.O. Box 4373  
Louisville, KY 40204-0373



*Counsel for Respondents*

January 11, 2012

*By Facsimile and U.S. Mail*

Emily Dennis  
General Counsel  
Kentucky Registry of Election Finance  
140 Walnut Street  
Frankfort, Kentucky 40601

**Re: Election Finance Complaint Filed by Metro Council Candidate  
Curtis Morrison, Kentucky Registry of Election Finance Case No.  
2011-203**

Dear Ms. Dennis,

Your office served me with a notice and copy of a complaint filed by Curtis Morrison, alleging non-specific violations of KRS chapter 121 by the Campaign Fund of Greg Fischer for Mayor and the Inaugural Committee. As treasurer for each of these accounts, and as the person with the most knowledge regarding the specific allegations made by Mr. Morrison, I am responding to your notice. This letter is made under oath and subject to penalty of perjury.

First, Mr. Morrison alleges that "according to a December 8, 2011 story in the Courier Journal ..., Ed Hart and Bruce Lunsford both have made representations that they contributed to the inauguration, even though the Fischer for Mayor campaign has reported their contributions." Mr. Morrison does not allege that he contributed any funds to the campaign or inaugural accounts that were improperly handled, nor does he allege any first-hand knowledge of a violation. Further, Mr. Morrison did not cite any specific violation of campaign finance law in his complaint.

Mr. Morrison's claim is not true. As treasurer for the inauguration account, I have reviewed all of the checks received for the inauguration. Mr. Hart and Mr. Lunsford never made contributions to the inauguration account, and no contribution made to the inauguration account was ever diverted or used for any other purpose. I have attached Mr. Hart's and Mr. Lunsford's checks as Exhibits A and B to this letter, respectively. Please note that account numbers for each check have been redacted.

As you can see from Mr. Hart's checks (Exhibit A), it is clear that Mr. Hart intended to contribute to the general and primary election accounts. Each check is made payable to "Fischer for Mayor," and the "memo" line of each check reflects the account to which Mr. Hart wanted his contribution applied. Check number 2035 shows that the check was a "Primary contrib.," so I applied the check to the primary account. Check number 2036 shows that it was an "Election contrib.," so I applied the check to the general election account. Neither check reflects that it was a contribution for the inaugural account.



As you can see from Mr. Lunsford's checks (Exhibit B), Mr. Lunsford also intended to contribute to the general and primary election accounts. Each check is made payable to "Greg Fischer for Mayor." The "memo" line of check number 15425 reflects that Mr. Lunsford's contribution was intended for the "Primary," and I accordingly applied the check to the primary account. The "memo" line of check number 15426 reflects that Mr. Lunsford's contribution was intended for the "General," so I applied the check to the general election account. As with Mr. Hart's checks, neither of Mr. Lunsford's contributions reflects any intention that they be used for the inauguration.


To the contrary, all four checks clearly demonstrate the payors' written instructions to make primary and general election contributions. As campaign treasurer, I was obliged to honor these donors' instructions. These facts were not reported in the December 8, 2011 story referenced by Mr. Morrison, which may have led to the confusion. Please note that I, as well as all of the respondents, emphatically deny that Mr. Hart's and Mr. Lunsford's contributions were used in a way that was contrary to their instructions.

Second, Mr. Morrison alleges that the Greg Fischer website "was and is still registered to Iceberg Ventures." Iceberg Ventures, LLC, as you can see from the attached May 4, 2009 Secretary of State Annual Report (attached as Exhibit C), is a limited liability company wholly-owned by Greg Fischer. As you know, limited liability companies are permitted to make contributions to campaigns. I refer you to Registry Advisory Opinion 2010-004, which provides that limited liability companies may make contributions in compliance with KRS chapter 121.

However, I have reviewed the reports submitted to the Registry by the inaugural, general and primary campaign accounts and note that the contribution and use of the website should have been reported and attributed to the LLC's "individual members according to their respective ownership interests," as set forth in the Advisory Opinion. Accordingly, I will amend all appropriate reports to reflect this personal contribution by Mayor Fischer, and will communicate with your office to ensure the amended reports are completed on or before February 17, 2012.

As treasurer, neither I nor anyone I am aware of has violated any campaign finance law, nor have we intended to do so. Thanks very much for your time and attention to this issue. If you have any follow up questions regarding Mr. Morrison's complaint or any other matter, please contact me at your convenience. However, please note that I will be travelling for approximately two weeks. If you have any immediate concerns, and if you will also address them to each of the individual respondents, a response will be provided to you as soon as possible.

Sincerely,



Jon Meyer

**BEFORE THE  
KENTUCKY REGISTRY OF ELECTION FINANCE  
CASE NO. 2011-203**

CURTIS L. MORRISON

COMPLAINANT

**v. RESPONDENTS, CAMPAIGN FUND OF GREG FISCHER  
FOR MAYOR OF LOUISVILLE METRO GOVERNMENT, JON A. MEYER,  
TREASURER; GREG FISCHER MAYORAL INAUGURATION COMMITTEE,  
CHRISTY BROWN, CHAIRPERSON, JON A. MEYER, TREASURER;  
ICEBERG VENTURES, LLC; AND GREG FISCHER, AS CANDIDATE FOR  
MAYOR OF LOUISVILLE METRO GOVERNMENT AND MEMBER OF  
ICEBERG VENTURES, LLC'S  
RESPONSE AND OPPOSITION TO COMPLAINT**

CAMPAIGN FUND OF GREG FISCHER FOR  
MAYOR OF LOUISVILLE METRO  
GOVERNMENT, JON A. MEYER, TREASURER;  
GREG FISCHER MAYORAL INAUGURATION  
COMMITTEE, CHRISTY BROWN, CHAIRPERSON,  
JON A. MEYER, TREASURER; ICEBERG  
VENTURES, LLC; AND GREG FISCHER, AS  
CANDIDATE FOR MAYOR OF LOUISVILLE  
METRO GOVERNMENT AND MEMBER OF  
ICEBERG VENTURES, LLC

RESPONDENTS

\*\*\*\*\*

Respondents, Campaign Fund of Greg Fischer for Mayor of Louisville Metro Government, Jon A. Meyer, Treasurer; Greg Fischer Mayoral Inauguration Committee, Christy Brown, Chairperson, Jon A. Meyer, Treasurer; Iceberg Ventures, LLC; and Greg Fischer, as Candidate for Mayor of Louisville Metro Government and Member of Iceberg Ventures, LLC (collectively, the "Respondents"), by counsel, submit the following response and opposition to the Complaint filed by Curtis L. Morrison:

Respondents submit that the allegations in the Complaint are without merit as evidenced by the attached verified and sworn letter from Jon A. Meyer, Treasurer of the Campaign Fund of Greg Fischer for Mayor of Louisville Metro Government and Greg

Fischer Mayoral Inauguration Committee. (See Exhibit 1, Letter dated January 11, 2012 from Jon A. Meyer to Emily Dennis, Kentucky Registry of Election Finance, verified and sworn under penalty of perjury.) Exhibit 1 is incorporated herein by reference in its entirety as evidence that the Respondents did not violate KRS Chapter 121. Accordingly, Respondents respectfully request that the Complaint be dismissed in its entirety because no evidence exists to support any alleged wrongdoing.

Respectfully submitted,



Jennifer A. Moore  
GROSSMAN & MOORE, PLLC  
401 W. Main Street, Suite 1810  
Louisville, KY 40202  
(502) 657-7100  
(502) 657-7120 (facsimile)  
[jmoore@gminjurylaw.com](mailto:jmoore@gminjurylaw.com)

*Counsel for Respondents, Campaign Fund of Greg Fischer for Mayor of Louisville Metro Government, Jon A. Meyer, Treasurer; Greg Fischer Mayoral Inauguration Committee, Christy Brown, Chairperson, Jon A. Meyer, Treasurer; Iceberg Ventures, LLC; and Greg Fischer, as Candidate for Mayor of Louisville Metro Government and Member of Iceberg Ventures, LLC*

**CERTIFICATE OF SERVICE**

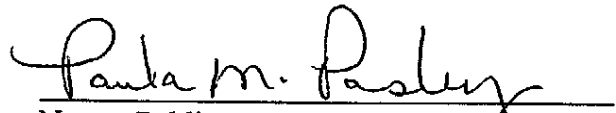
I hereby certify that a true and accurate copy of the foregoing has been served by U.S. Mail, postage pre-paid, on this 12<sup>th</sup> day of January, 2012 to the following individuals:

Curtis L. Morrison  
P.O. Box 4373  
Louisville, KY 40204-0373

  
\_\_\_\_\_  
*Counsel for Respondents*

COMMONWEALTH OF KENTUCKY )  
COUNTY OF JEFFERSON )

Subscribed, sworn to and acknowledged before me by Jon Meyer on this 11<sup>th</sup> day of  
January, 2012.



Notary Public

My Commission Expires: June 19, 2013



EXHIBIT A

**Capital Service Account**

EDWARD J HART  
1400 WILLOW  
UNIT # 1505  
LOUISVILLE KY 40204-1467

UMB BANK, N.A. 2036  
Date: 1-10-2011 60-1885/1012

Pay to the order of Fischer for Mayor \$ 1,000.00  
One thousand and 00/100 Dollars

**HILLIARD LYONS** 1525 East Lyons  
200 West Jefferson Street  
Suite 700  
Louisville, Kentucky 40202

Election contb. Wayne W. Dillit

Capital Service Account

**Capital Service Account**

EDWARD J HART  
1400 WILLOW  
UNIT # 1505  
LOUISVILLE KY 40204-1467

UMB BANK, N.A. 2036  
Date: 1-10-2011 60-1885/1012

Pay to the order of Fischer for Mayor \$ 1,000.00  
One thousand and 00/100 Dollars

**HILLIARD LYONS** 1525 East Lyons  
200 West Jefferson Street  
Suite 700  
Louisville, Kentucky 40202

Primary contb. Wayne W. Dillit

Capital Service Account

EXHIBIT B

© 2005 INTUIT INC. # 720 1-800-433-8310

W. BRUCE LUNSFORD  
4360 BROWNSBORO ROAD, SUITE 305  
LOUISVILLE, KY 40207-1642

PNC BANK NATIONAL ASSOCIATION  
LOUISVILLE, KY 40202  
21-10830

15426

1/31/2011


PAY TO THE ORDER OF Greg Fischer for Mayor

One Thousand and 00/100\*\*\*\*\*

\$ 1,000.00

DOLLARS

MEMO General



*W. Bruce Lunsford*

© 2005 INTUIT INC. # 720 1-800-433-8310

W. BRUCE LUNSFORD  
4360 BROWNSBORO ROAD, SUITE 305  
LOUISVILLE, KY 40207-1642

PNC BANK NATIONAL ASSOCIATION  
LOUISVILLE, KY 40202  
21-10830

15425

1/31/2011


PAY TO THE ORDER OF Greg Fischer for Mayor

One Thousand and 00/100\*\*\*\*\*

\$ 1,000.00

DOLLARS

MEMO Primary



*W. Bruce Lunsford*

**Commonwealth of Kentucky  
Trey Grayson, Secretary of State**

**0473271** **LARP**  
Trey Grayson  
Secretary of State  
Received and Filed  
5/4/2009 10:18:53 PM  
Fee receipt: \$15.00

<p>Trey Grayson Secretary of State P. O. Box 1150 Frankfort, KY 40602-1150 (502) 564-3490 <a href="http://www.sos.ky.gov">http://www.sos.ky.gov</a></p>	<p><b>Annual Report Web Filing</b></p>	<p><b>ARP</b></p>
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**Company:** ICEBERG VENTURES, LLC  
**Company ID:** 0473271  
**State of origin:** Kentucky  
**Formation date:** 4/28/1999 12:00:00 AM  
**date filed:** 5/4/2009 10:18:53 PM  
**Fee:** \$15.00

**Principal Office**  
 1715 SPRING DRIVE  
 LOUISVILLE, KY 40205

**Registered Agent Name/Address**  
 GREGORY E. FISCHER  
 1715 SPRING DRIVE  
 LOUISVILLE, KY 40205

**Members/Managers**

Member	Gregory E Fischer	1715 Spring Drive, Louisville, KY 40205
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**Signatures**

<b>Signature</b>	Gregory E. Fischer
<b>Title</b>	Member