



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 24, 2022

Stephany Rose Spaulding; Stephany Rose for Congress
10929 S. State Street Unit 1
Chicago, IL 60628

Re: ADR 1049 & 1050 – Stephany Rose Spaulding; Stephany Rose for Congress
and Jason D. Christensen, Treasurer (C00649038)

Dear Respondent(s):

On April 10, 2018 and July 10, 2018, the Federal Election Commission (FEC/Commission) received Complaints alleging certain violations of the Federal Election Campaign Act of 1971, as amended, and provided notification to you including a copy of each Complaint.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and dismiss the matter. In its memorandum to the Commission, dated March 8, 2022, this office stated:

Summary and Analysis of Case: On April 10, 2018, Betty A. Field filed a Complaint alleging that Stephany Rose Spaulding, Stephany Rose for Congress, and Jason D. Christensen, Treasurer (Respondents or the Committee) “laundered monies from a church in Illinois through her personal bank account, then disbursed it to family members and friends to donate back to her campaign.” On July 10, 2018, Chandra Wilkins filed a separate Complaint alleging that Respondents received \$12,000 from a church, cashed the check, and deposited the funds into the Committee's bank account in individual amounts under the itemization threshold to avoid disclosing donor information. In addition, the Complaint filed on July 10, 2018, further alleges that Respondents failed to disclose \$30,000 in loans. To support these contentions, the Complaints provide a news article stating campaign staffers quit this campaign based on a suspicion of potential campaign finance violations and a disagreement with “fundraising practices on ethical grounds,” and screenshots of text messages with the candidate.

In a response filed on April 26, 2018, Respondents included an affidavit from the candidate stating that neither she nor her family received money

from a church in Illinois that was ultimately passed through to Stephany Rose for Congress. An affidavit from the Treasurer, Jason D. Christensen, states he was aware of no facts to support the allegations within the Complaint and that all campaign contributions have been properly and completely disclosed with the FEC. Further, affidavits from both the candidate's mother and father state their contributions were made using their own funds and were not made using funds from another.

Additionally, in a response filed on August 29, 2018, Respondents denied the allegations in the Complaint filed on July 10, 2018, and further contended that FEC reports filed by the campaign reflected all Committee activity and that there were no additional receipts or expenditures in its bank account aside from the activity of the Committee. An additional affidavit was filed on behalf of the candidate further refuting the allegations in the Complaint.

In a third affidavit, signed on February 11, 2022, Spaulding states she and her campaign never received any loans, nor did they receive funds directly from a church or religious institution. Additionally, Spaulding denies the allegation of co-mingled funds and states the Committee maintained a separate bank account. Spaulding also states no funds were distributed to any individuals that were unreported on the Committee's FEC reports and states they did not direct any individuals or entities to contribute to the campaign with funds they provided. During discussions with ADRO, Respondents stated that the candidate's text message statement regarding \$30,000 that the candidate was allegedly "on the hook for," as described in the Complaint in MUR 7424, related to the candidate's sense of personal responsibility to her working-class donors rather than the acceptance of a loan.

While processing this matter, Respondents provided the ADRO with access to financial documents and an updated affidavit denying the claims in both Complaints. Given the circumstances presented above, we recommend that the Commission exercise prosecutorial discretion and dismiss the matter. *Heckler v. Chaney* 470 U.S. 821 (1985).

Accordingly, the Commission closed its file in this matter on March 16, 2022.

The FEC is obligated by federal regulations to make a finding to terminate its proceedings public, as well as the basis therefore. 11 C.F.R. § 111.20. In addition, the Commission will also place on the record copies of the complaint, correspondence exchanged between Respondents and the Commission, and reports prepared for the Commission by this office to assist in its consideration of this matter. Accordingly, copies of documents relative to this matter will be forwarded shortly to the FEC's Public Information Office.

The Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 52 U.S.C. § 30109(a)(8).

Sincerely,

A handwritten signature in black ink, appearing to read "Joshua Rebollozo". The signature is fluid and cursive, with the first name "Joshua" written in a larger, more prominent script than the last name "Rebollozo".

Joshua A. Rebollozo
Assistant Director
Alternative Dispute Resolution Office