

**FEDERAL ELECTION COMMISSION**

**IN RE:**

**BRIAN LAMONT DOYLE  
BRIAN "RYAN B" DOYLE FOR  
CONGRESS,**

**RESPONDANT,**

**-versus-**

**CITIZENS FOR RESPONSIBILITY  
AND ETHICS IN WASHINGTON, and  
MELANIE SLOAN,**

**COMPLAINANTS.**

**MUR NO.: 6312**

**OFFICE OF GENERAL  
COUNSEL**

**2010 AUG 10 PM 3:15**

**RECEIVED  
FEDERAL ELECTION  
COMMISSION**

**RESPONSIVE DOCUMENT, F.O.I.A. REQUEST,  
REQUEST FOR DISMISSAL, SANCTIONS,  
AND ANY AND ALL PROSPECTIVE AVAILABLE RELIEF**

**COMES NOW** Brian Lamont Doyle and Brian "Ryan B" Doyle for Congress and moves this honorable Commission: to Dismiss the Complaint of CREW and Sloan herein; to sanction Complainants for a pattern of bringing abusive and politically/financially motivated Complaints before this honorable Commission; to reveal, if only in the nature of a response to a F.O.I.A. Request, the number of previous complaints previous made by Complainants, those sustained, those found to be unsubstantiated, and to any extent available the

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demographics of complainants targets. Complainants are requested to provide/reveal: the amount and source of all their funding for the past five years; their general ledger and payroll; and all documents, phone logs, memos, writings, letters, emails, or data compilations of any sort reflecting how Complainants came to be targeted by them and the initial source or motivation of their initial decision to investigate/target Respondents. Complainants are also requested to reveal all documents, applications and reports filed by them with the IRS in support of or compliance with the requirements placed upon them by their purported status as a 50-1(c)(3) organization. Sloan is similarly requested to provide her income tax returns and banking records for the past five years and also the statements for any credit card or other accounts that she has use of which are not in her name.

## **RESPONSE TO COMPLAINT**

### **INITIAL CONCERN**

It appears that a substantial portion of the Complaint has been redacted. This is not acceptable to Respondants. Respondants are entitled to analyze and be aware of everything that Complainants have "put on the record" in this matter. It is nothing short of a substantive due process violation for this honorable Commission to not inform Respondants completely of everything that has been provided by Complainants herein. Therefore this Response is precutory and

subject to supplementation and amendment as Respondents obtain further information.

1.

Paragraph one of the Complaint is redacted. Respondents must therefore deny said paragraph and demand that the entire paragraph be revealed to them.

2.

Defendant denies paragraph two of the Complaint and shows that CREW is an arm of wealthy, powerful, elitist powers that seek to attack and neutralize honest, minority and outside of the mainstream political hopefuls, and employ funds that otherwise would not be available for these purposes under the guise of "charity/non-profit" operations to allow wealthy powerful people, corporations and organizations to wrongfully launder their money into political activities.

3.

In response to paragraphs three, four, five and six, Respondents re-allege paragraph two above and show that this is a politically/financially motivated sham Complaint brought for improper purposes and seeking to use this honorable Commission as a pawn in order to advance a hidden agenda.

4.

Respondents demand that paragraphs seven through nine be revealed to them.

5.

Paragraphs eleven through sixteen, apparently all of the factual averments and Count I of the Complaint have been redacted. Respondents vehemently object and DEMAND that the complaint in its entirety be made available to them immediately.

6.

Regarding Paragraphs seventeen through twenty-one<sup>1</sup> Respondents show that they have rightfully relied on the information provided to them by this honorable Commission and its representatives. Specifically Respondents were informed that no reporting would be necessary unless and until an amount in excess of five-thousand dollars (\$5,000.00 USA) had been donated/collected.

7.

For the very purpose of avoiding situations such as this no campaign contributions were accepted by Respondents. The campaign was completely self-funded by Respondent Doyle.

8.

Of information and belief Respondents have faithfully and fully complied with all the requirements placed upon them.

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<sup>1</sup> Respondents restate their objection and demand as to the redaction of paragraph 18.


9.

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If complainants motives were as pure and sincere as they pretend they could have discovered anything they wished to know by the simple expedient of making a phone call or sending a letter or email to Respondents instead of this thinly veiled attempt to circumvent the Voting Rights Act and interfere in pending litigation between Respondent Doyle and the South Carolina Democratic Party<sup>2</sup> and to financially and logistically place the maximum amount of burden possible upon the Respondents.

WHEREFORE, Respondents request that this action be dismissed, that Complainants be appropriately sanctioned and forbidden in the future from bringing such abusive burdensome actions without fair and reasonable investigation or inquiry on their parts prior to involving so much personal insult and burden to their victims and waste of taxpayer money in the advancing of their corrupt reprehensible political/financial agenda.

Respectfully submitted this the 5<sup>th</sup> day of August, 2010.

  
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Brian Lamont Doyle, individually  
and for Brian "Ryan B" Doyle  
for Congress

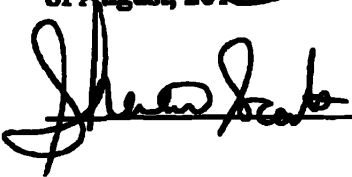
<sup>2</sup> Respondents are presently researching the feasibility and desirability of adding Complainants herein as additional named Defendants in the above referenced suit against the South Carolina State Democratic Party.

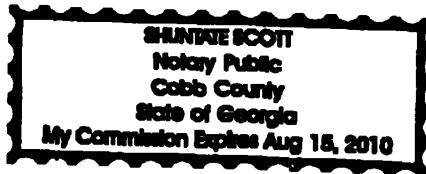
**VERIFICATION**

All of the above and foregoing is true and correct.

Sworn to and subscribed  
before me this 5<sup>th</sup> day  
of August, 2010

  
\_\_\_\_\_  
Brian Lamont Doyle  
Affiant





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**CERTIFICATE OF SERVICE**

I have this day served a true and correct copy of the above and foregoing  
upon:

Melanie Sloan, individually and in her capacity as  
Executive director of  
Citizens for Responsibility and Ethics in Washington  
1400 Eye Street, N.W., Ste. 450  
Washington, DC 20005.

by facsimile (202 – 588-5020) and First Class U.S. Mail. This the 5<sup>th</sup> day of  
August, 2010.



Brian "Ryan B" Doyle