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2012 MAR 20 AM 4:41

OFFICE OF GENERAL
COUNSEL



Federal Election Commission
Office of General Counsel
Attn: Anthony Herman, Esquire
999 E Street, NW
Washington, DC 20463

MUR# 6541

Re: Complaint against Kenny Marchant for Congress and for forcing David Jordan Schirman to make a contribution in the name of another to attend an event that he would have otherwise never attend nor supported.

Dear General Counsel Herman:

Pursuant to 2 U.S.C. § 441f and 11 C.F.R. § 110.4(b)(1)(iii), please accept this letter as a complaint against Kenny Marchant for Congress ("Respondent A") and David Jordan Schirman ("Respondent B"). Kenny Marchant is a candidate for Congress in the 24th District of Texas (H4TX34094).

My name is Grant Stinchfield, candidate for the U.S. House of Representatives for District 24 in Texas ("Complainant").

The facts in this matter indicate that the Respondents conspired to gain access to my golf event on by making contributions in the name of another in violation of the Federal Election Campaign Act of 1971, as amended, and Federal Election Commission ("FEC" and or "Commission").

On February 27th Grant Stinchfield held a golf tournament fundraiser at Brookhaven Country Club. "Jordan Sherman" and "Carter Kendall" registered for the tournament on February 26th and each made a \$40 contribution online for the tournament and filled out a volunteer form at registration. After the tournament, the campaign mailed out thank you letters to each person who contributed to Grant's campaign. The thank you letters to "Jordan Sherman" and "Carter Kendall" both were returned to because they had incorrect addresses. "Jordan Sherman" listed his occupation as co-founder of Church Without Buildings. In order to seek clarification, we went to the Church Without Buildings Facebook page and website and confirmed that David Jordan's last name was actually Schirman. We verified this using his Facebook picture and photos taken at the golf tournament. "Carter Kendall" also listed that he worked at Church without Buildings. After multiple searches, we could not locate "Carter Kendal" as he did not submit any accurate information, nor were we able to find any after extensive searches.

On March 7, 2012 we informed our compliance director of the violation and sought his guidance on how to protect the campaign from this serious matter. After speaking with the information division on the same day, the campaign prepared two letters for each contribution. (Exhibit A and B) It is our understanding that we have to report this matter on our FEC report and file a complaint regarding any wrong doing by the respondents.

On March 12, 2012 we were able to make contact with David Jordan Schirman. Mr. Schirman confirmed he made illegal contributions under false names and a false person. Our credit card records confirmed his report of making a credit card contribution in another name other than his own. He also volunteered that Chad Brabaker is his "best friend" that is employed by Mr. Marchant.

Paid for by Stinchfield for Congress

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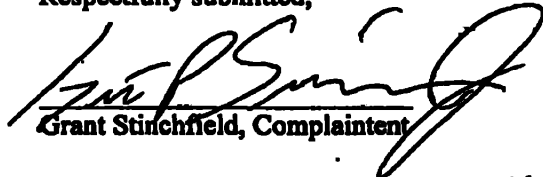
As the regulations state: It is unlawful for any person to make a contribution in the name of another person, to knowingly permit her name to be used to effect such a contribution, or to knowingly accept such a contribution. 2 U.S.C. § 441f. The term "contribution includes any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for federal office. 2 U.S.C § 431(8)(A)(i). Pursuant to 11 C.F.R. § 110.4(b)(1)(iii), it is a violation of 2 U.S.C § 441f for a person to knowingly assist any person in making such a conduit contribution.

Complainant suggests the respondents knowingly and willfully violated 2 U.S.C § 441f in connection with the making of contributions in the names of others, as described in Section IV, 5-16. Complainant suggests this was done by the Respondents to gain access to what was a fundraiser for supporters of my campaign but in lieu tried to spy on my campaign and obtain information about my supporters.

Accordingly, we respectfully request that the FEC ~~must~~ conduct ~~an~~ immediate investigation into the violations outlined above and impose the maximum penalty under the law. The Respondents blatantly disregarded the law with regard to contributions and reporting requirements of the FEC and undermine the public disclosure of campaign records.

The aforementioned is correct and accurate to the best of my knowledge, information and belief.

Respectfully submitted,


Grant Stinchfield, Complainant

Sworn to and subscribed before me this 16 day of March, 2012



Notary Public

Exhibits:

- (a)
- (b)

