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OFFICE OF GENERAL
COUNSEL

May 12, 2014

VIA HAND DELIVERY

Jeff B. Jordan, Esq.
Supervisory Attorney
Complaints Examination & Legal Administration
Federal Election Committee
999 E Street, NW
Washington, DC 20463

Re: Response to MUR 6800

Dear Mr. Jordan:

As you are aware, I represent Lori Pyeatt and the Ron Paul 2012 Presidential Campaign Committee, Inc. (collectively, the "RP2012") in the above-referenced inquiry.

As stated in your March 27, 2014 letter, the materials attached to that letter were filed as a supplement to the complaint in another matter. Those materials were filed by Mr. Peter Waldron ("Mr. Waldron") and the FEC has determined that those materials constitute an original complaint against RP2012. The basis for this determination is not clear.

Mr. Waldron was never employed by or connected in any manner with RP2012.¹ Thus, he has no first-hand knowledge of the campaign, its personnel, or its activities. Mr. Waldron appears to be merely forwarding copies of internet postings from a website, the IowaRepublican.com, and making allegations based on those postings. Mr. Waldron lacks any direct knowledge related to RP2012 and is simply regurgitating multiple levels of hearsay from that website.² Further, contrary to 2 U.S.C. § 437g(a)(12), it appears that Mr. Waldron has participated with the IowaRepublican.com website to gain media attention for himself and make public his complaint and

¹ In fact, Mr. Waldron was employed by the Michele Bachmann 2012 Presidential Campaign. The filing of specious FEC complaints by political opponents is too common a practice. The FEC complaint process should not be a place for the airing of political vendettas.

² www.theiowarepublican.com

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the FEC's response. As a matter of fact, a copy of the letter Mr. Waldron received from the FEC acknowledging his complaint was published on the IowaRepublican.com website.³ RP2012 does not consent to this matter being made public, but that right appears to have been violated from the onset by the complainant Mr. Waldron.⁴

While it is clear that Mr. Waldron's actions in filing this alleged complaint with the FEC were intended to gain publicity, it is unclear from that filing what provision of the law RP2012 is alleged to have violated.

In response to the FEC's March 27th letter, we first ask that the FEC dismiss the alleged complaint because it is based solely on hearsay published on a website and also because RP2012's right to have this matter conducted in a confidential manner has been violated by the complainant.

If the FEC is unwilling to dismiss this alleged complaint, we ask that the FEC clarify: 1) the basis for determining that this was an original complaint against RP2012; and 2) what provision of federal law was violated as a result of the unsubstantiated hearsay allegations contained in Mr. Waldron's submission.

If the FEC does not dismiss this complaint outright, upon clarification of these issues, RP2012 requests an additional sixty (60) days to respond based on those clarifications.

Alternatively, if the FEC believes it possible to achieve an efficient resolution of this matter without incurring the costs or burdens of briefing reason to believe and probable cause findings, we would be willing to meet with the General Counsel's office to discuss the allegations contained in the complaint. Please let us know how you wish to proceed.

³ This publication may violate the publicity provisions of 2 U.S.C. § 437g(a)(12). A complainant is not permitted to disclose any information relating to any notification of findings by the Commission or actions taken by the Commission in an investigation until the case is closed or the respondent waives the right to confidentiality. *FEC Advisory Opinions* 1994-32 and 1995-1. Here, Mr. Waldron published on a website the FEC's acknowledgement letter, which discloses actions taken by the Commission—its decision to notify the respondents about the complaint.

⁴ It appears that the FEC's response to Mr. Waldron was published on the IowaRepublican.com website before RP2012 was made aware of the FEC's inquiry.

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I may be reached via the contact information below.

Thank you for your cooperation in this matter.

Best Regards,



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