

U.S. FEDERAL ELECTION COMMISSION

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April 26, 2018

Mr. Jeff Jordan
Office of Complaints Examination & Administration
Federal Election Commission
1050 First Street NE
Washington, DC 20463

Re: MUR 7341 – Beth Ann Garcia

Dear Mr. Jordan:

I am writing to respond to the allegations made against me in MUR 7341.

First, the complaint alleges that my contribution to the 2016 congressional campaign of my son, Philip J Law, was not proper. I made this contribution with my personal funds. I was not reimbursed or given funds by anyone else to make this contribution.

Second, the complaint alleges that my younger son, John-Michael Allaire, could not have been able to contribute \$2,700 to his older brother's 2016 congressional campaign because he was a college student at the time. While John-Michael was in college, his father and I paid for his living expenses (e.g., housing, food, car, medical) and provided him with an allowance to spend at his discretion. We transferred the allowance to John-Michael's bank account on a periodic basis. I reviewed my bank account records, and the amounts we transferred to John-Michael's bank account for his allowance were consistent before, during, and after Philip's campaign. I did not make any unusual or "special" transfers to John-Michael around the time he contributed to Philip's campaign, nor did I transfer money to John-Michael for him to contribute to Philip's campaign.

It is my understanding that the allowance John-Michael's father and I gave to John-Michael became his personal funds once transferred to his bank account. The bank account was opened and maintained in John-Michael's name. I did not control how John-Michael spent his allowance, nor did I give him funds for him to contribute to Philip's campaign. John-Michael made the decision to contribute to his older brother's campaign. He made the contribution from his own personal funds, which simply reduced the amount of money he had for other personal expenses and priorities.

Third, the complaint suggests that family members subsidized Philip's living expenses or gave him money to spend on his campaign. As Philip's mother, I gave my son and his family gifts during his campaign that were consistent with my gifts to them over many years and prior to 2015. For example, I gave Philip and his family gifts at Christmas and on their birthdays. I frequently paid for meals when we dined out together. I also occasionally "treated" Philip's wife and paid for clothing or household items when we were out together. In addition, I often gave small amounts of cash (about \$100-\$150 per month) to Philip's wife for her to spend on herself and the children. I did not give any other monetary gifts to Philip or his family while he

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