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April 19, 2018

MUR # 7390

OFFICE OF  
GENERAL COUNSEL

2019 MAY 21 PM 2:21

Office of General Counsel  
Federal Election Commission  
1050 First Street, NE  
Washington, DC. 20463

Re: Misuse of campaign funds for legal fees for candidate  
Donald Trump

Dear General Counsel:

I file this complaint against U.S. presidential candidate Donald Trump's re-election campaign and the Republican National Committee for allowing these political campaign entities to pay for President Trump's lawyers for among other things, a criminal investigation.

According to the attached Reuters news story dated September 19, 2017, the following questionable spending of legal fees occurred:

1. The Republican National Committee paid more than \$230,000 to cover some of Trump's legal fees related to the probe.

2. Trump's lead lawyer John Dowd received \$100,000 from the Republican National Committee
3. The Republican National Committee also paid \$131,250 to the Constitutional Litigation Advocacy Group where Attorney Jay Sekulow is a partner. Sekulow is another Trump lawyer.
4. The probe into whether or not Trump obstructed justice by firing FBI Director James Comey has nothing to do with anyone's campaign.
5. The law firm of Jones Day received \$4 million.
6. Trump filed for reelection the day he took office in January 2017.
7. Public campaign funds cannot be used for expenses arising from criminal investigations, or for any expenses that arise after the campaign is over.
8. The Trump campaign paid \$50,000 to the law firm of Alan Futerfas, who is representing Donald Trump, Jr.

According to the Maryland Board of Elections, investigations or charges involving misconduct are NOT campaign-related, even if the charges first come to light as a result of the individual's decision to run for elected office. See Summary Guide to Maryland Candidacy and Campaign Finance Laws Section 9.9. According to the Maryland Board of Elections, there must be a nexus or direct connection between Trump and his candidacy. Investigations or charges involving misconduct are not campaign-related.

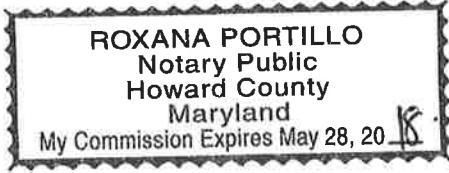
These campaign expenditures should be disallowed and a notice given to these political campaigns that if the monies are not reimbursed, the cases will be referred to state prosecutors and federal prosecutors. In Maryland, all of these events occur without due process, so I am certain the same should occur with Presidential candidate Donald Trump and the Republican National Committee chair and other relevant parties.

I can be reached on my cell phone at

I HEREBY DECLARE AND OR AFFIRM UNDER PENALTY OF PERJURY THE FOREGOING NUMBERED PARAGRAPHS ARE FACTS FROM THE ENCLOSED REUTERS NEWSPAPER ARTICLE, AND THE ARTICLE IS A TRUE AND CORRECT COPY FROM THE INTERNET.

*Claudia Barber 5/2/2018*  
Claudia Barber,

Subscribed to and sworn to  
before me, a Notary Public  
On this 2<sup>nd</sup> day of May 2018



*ROXANA PORTILLO*  
My Commission Expires May 28, 2018  
NOTARY PUBLIC

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POLITICS SEPTEMBER 19, 2017 / 3:55 PM / 7 MONTHS AGO

# Trump using campaign, RNC funds to pay legal bills from Russia probe: sources

Karen Freifeld, Ginger Gibson

6 MIN READ



NEW YORK (Reuters) - U.S. President Donald Trump is using money donated to his re-election campaign and the Republican National Committee to pay for his lawyers in the probe of alleged Russian interference in the U.S. election, two people familiar with the matter told Reuters.



Following Reuters exclusive report on Tuesday, CNN reported that the Republican National Committee paid in August more than \$230,000 to cover some of Trump's legal fees related to the probe.

RNC spokesperson Cassie Smedile confirmed to Reuters that Trump's lead lawyer, John Dowd, received \$100,000 from the RNC and that the RNC also paid \$131,250 to the Constitutional Litigation and Advocacy Group, the law firm where Jay Sekulow, another of Trump's lawyers, is a partner.

The RNC is scheduled to disclose its August spending on Wednesday. The Trump campaign is due for a disclosure on Oct. 15.

The U.S. Federal Election Commission allows the use of private campaign funds to pay legal bills arising from being a candidate or elected official.

While previous presidential campaigns have used these funds to pay for routine legal matters such as ballot access disputes and compliance requirements, Trump would be the first U.S. president in the modern campaign finance era to use such funds to cover the costs of responding to a criminal probe, said election law experts.

Smedile said the RNC payments to Trump's lawyers were "from a pre-existing legal proceedings account and do not reduce by a dime the resources we can put towards our political work."

It was not clear how Trump's legal costs related to the Russia probe would be allocated between the campaign and the RNC, one of the sources said.

Dowd declined to say how the president's legal bills were being paid, adding: "That's none of your business."

Special counsel Robert Mueller is looking at possible collusion between the Trump campaign and Russia in last year's election, and whether Trump may have obstructed justice by firing Federal Bureau of Investigation Director James Comey, among other actions.

Moscow has denied meddling in the U.S. election, and Trump has denied any collusion or obstruction.

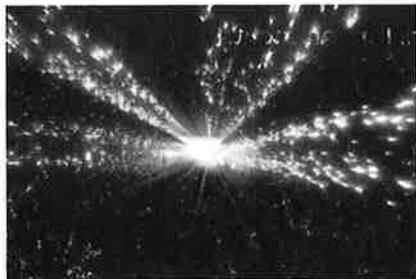
Reuters could not determine how large a legal bill Trump has incurred to date from his lawyers on the Mueller investigation. Trump hired his longtime New York lawyer Marc Kasowitz to head his defense team in May, but Kasowitz stepped down in July, with Dowd taking over the lead role, according to people familiar with the situation.

Special White House counsel Ty Cobb, who is a salaried staff member, is also working on the matter.

The Trump campaign has paid law firm Jones Day almost \$4 million, according to campaign filings, mostly for routine campaign legal expenses like ballot access disputes, vendor contracts, human resources and compliance with state and federal laws. It has also responded to Russia-related inquiries on behalf of the campaign by, for example, providing documents to Congress.

## **FOLLOWING OBAMA'S LEAD**

The reason Trump is able to tap into his campaign funds for legal expenses is because for the past decade, presidential candidates have abandoned public financing for their campaigns. Instead, they have built networks that collect millions of dollars from private donors, a move that comes with less restrictions on how the money is spent.

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Barack Obama in 2008 was the first to eschew public financing for his campaign, and all the major-party candidates followed suit in 2012 and 2016, campaign filings show.

Trump also filed for reelection the day he took office in January, two years earlier than any previous president, ensuring a fund of millions in campaign cash would remain at his disposal.

According to its most recent filing to the Federal Election Commission, Donald J. Trump for President Inc had almost \$12 million on hand by the end of June, an increase of over \$4 million since January.

Adav Noti, a senior director at the Campaign Legal Center, a watchdog group that describes itself as nonpartisan, said public campaign funds - as opposed to the private funds Trump has raised - cannot generally be used for expenses arising from criminal investigations, or for any expenses that arise after the campaign is over.

President Bill Clinton, who ran two publicly funded campaigns, had supporters start legal defense funds and used his own insurance to help pay legal bills during the Whitewater investigation. He still wound up with millions of dollars in personal debt which he paid off through speaking fees he earned once he left office.

Hillary Clinton, who ran a privately funded campaign, paid millions to campaign lawyers at Perkins Coie to handle routine legal matters, according to campaign filings. Her campaign made no payments to the Washington law firm Williams & Connolly, which represented her in the probes of her use of a private email server when she was U.S. Secretary of State.

Her lawyer, David Kendall of Williams & Connolly, declined to comment on how he was paid.

Campaigns also have discretion to pay legal fees for others besides the president.

Trump using campaign, RNC funds to pay legal bills from Russi...

<https://www.reuters.com/article/us-usa-trump-lawyers-exclusive/...>

According to a July filing, the Trump campaign paid \$50,000 to the law firm of Alan Futerfas, who is representing Donald Trump Jr. Futerfas did not respond for requests for comment.

FILE PHOTO: U.S. President Donald Trump arrives at a campaign rally in Phoenix, Arizona, U.S., August 22, 2017. REUTERS/Joshua Roberts

A number of other current and former Trump staffers have also recently hired lawyers.

Reporting By Karen Freifeld in New York and Ginger Gibson in Washington; Additional reporting by Grant Smith in Washington; Editing by Anthony Lin and Edward Tobin

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POLITICS APRIL 30, 2018 / 11:35 PM / UPDATED A DAY AGO

# Trump campaign aide Manafort sued by bankruptcy trustee over California property deal

Reuters Staff

3 MIN READ



(Reuters) - A bankruptcy trustee has filed a lawsuit against Paul Manafort in California alleging that he falsely claimed he was a creditor owed \$2.7 million in a failed real estate deal with his former son-in-law.

FILE PHOTO Paul Manafort, former campaign manager for U.S. President Donald Trump, departs after a hearing at U.S. District Court in Washington, DC, U.S., April 19, 2018. REUTERS/Brian Snyder/File Photo

The lawsuit, filed by trustee Thomas Casey on Thursday in the federal bankruptcy court in Santa Ana, California, adds to the legal challenges facing Manafort, who was head of Donald Trump's presidential campaign for a few months in 2016.

A spokesman for Manafort declined to comment on the lawsuit.

Manafort has been indicted for money laundering, tax evasion and other charges by a special counsel probing alleged links between the Trump campaign and Russia. Manafort has denied the charges and is preparing for trial.

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The California lawsuit relates to a \$2.7 million deed of trust that Manafort recorded in Los Angeles County that positioned himself as a secured creditor in a luxury property he was developing in partnership with his former son-in-law, Jeffrey Yohai.

The deed of trust was recorded Dec. 20, 2016, one day before the company that owned the property filed for bankruptcy protection to stave off foreclosure by lender Genesis Capital LLC, according to property and court records.

Casey, whose job as trustee is to liquidate the assets of the bankruptcy estate for the benefit of creditors, alleges in the lawsuit that the money Manafort put into the property was equity and not a loan as Manafort claimed.

FILE PHOTO - Paul Manafort, former campaign manager for U.S. President Donald Trump, leaves a U.S. District Court after attending a motions hearing in Washington, D.C., U.S. April 19, 2018. REUTERS/Carlos Barria

Casey said the attempt by Manafort to claim the more advantageous position of creditor amounted to a "fraudulent transfer" of assets "made with the actual intent to hinder, delay or defraud".

Manafort signed the deed of trust as “attorney-in-fact” for Yohai, who had granted Manafort the power to act as his attorney on Dec. 1, 2016, according to the lawsuit.

Casey, who is seeking to void the deed of trust and “a money judgment against the Defendant in the amount of the Transfer”, did not immediately respond to a request for comment.

Jim Hinds, a lawyer for Yohai, did not respond to an email seeking comment.

Reporting by Nathan Layne in NEW YORKEditing by Christopher Cushing

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