

OFFICE OF
GENERAL COUNSEL

2018 JUN 27 AM 10:15

Lombardi response to complaint

george lombardi

Thu 6/21/2018, 4:11 PM

To:CELA@fec.gov <CELA@fec.gov>;

Bcczac burr att <zach@zachburr.com>;

Dear Ms. Dennis,

as I mentioned in our brief phone conversation, I am enclosing my (draft) response to the MUR 7401 complaint.

I tried to be clear and to the point for every one of the points of the alleged violation. As mentioned in the enclosed letter, I did not retain counsel, for the moment, since it seems to be a frivolous attempt at receiving attention for a book publication.

In the next weeks I will be traveling and will not be in Florida up to the first week of September. For any further correspondence please email me at this address, or, if necessary to do it in writing, please send mail to:

G. Lombardi

New York, NY 10022

my work phone (cell) is

While in Europe please consider a 6 hours time zone difference.

Please advise me of the next step in the process.

Thank you

Sincerely
G. Lombardi

New York. June 21 2018

From the desk of

George G. Lombardi

Federal Election Commission
Office of Complaints Examination
Attn: Christal Dennis
1050 First Street NW
Washington DC 20463

Re: MUR 7401

Dear Ms. Dennis,

I am responding to your letter of June 11th 2018, regarding a complaint received by your office. MUR 7401.

I am addressing every allegation in detail; but let me preface that by noting that every unsubstantiated claim of improper behavior on my part is only based on vague and generic statements (some made on my Face Book personal page) found exclusively on Face Book pages, and that every so-called "document" enclosed in the complaint is but a screen shot of a Face Book post.

Regarding the two Face Book groups named Citizens for Trump and Coalition for Trump, they are, as far as I know, two Face Book groups that were started early in the Presidential Campaign. I helped these pages by simply posting pictures, posts and sharing ideas and comments. I am not involved in any way with any organization linked to the two individuals responsible for the groups: Mr. Tim Selaty and Mr. Robert Jeter.

Being an administrator (or co-administrator) in a Face Book page does not imply that I may be aware of any of the dozens or even hundreds of people chatting there.

In Cz4T and Co4T there are hundreds of thousands of followers. Members and administrators often use "pen names" and I certainly do not have access to their real identities or can be aware of their activities.

Regarding the Statement of Designation of Counsel, for the moment I do not intend to designate anyone since this seems a frivolous exercise by some people interested in generating publicity for themselves for the purpose, as stated in the first paragraph of their complaint, "doing research for a book." But I may decide to designate counsel in the future to prevent further action and libel.

Addressing the specific allegations:

“George Lombardi founded the political committees Citizens for Trump and Coalition for Trump.” This is totally erroneous. At the beginning of the Presidential campaign I did in fact meet once with then candidate Mr. Donald Trump and Mr. Lewandowski and discussed the possibility of supporting his effort. I never accepted any official position, never exchanged privileged information or got involved with procuring funds or paid services. As far as I know Citizens for Trump (Cz4T) and Coalition for Trump (Co4T) were never “committees,” but just simple pages on Face Book and nothing else.

The alleged “umbrella organizations overseeing hundreds of groups” is also false.

As the campaign progressed hundreds of similar pages and groups formed spontaneously all over the country. Some of their members and/or administrators decided to be part also of older groups, and eventually millions of Americans joined in the conversation. Most of the groups are run by legitimate individuals who just wanted to let their voice heard. When occasionally someone brought to my attention that moneys were solicited I quickly terminated (unfollow) my relationship with the group or individual.

Non- facts of the case:

#1. The screen shot of a Face Book (FB) page with Donald Jr. does not imply any of the allegations. The fact that occasionally I do stay in Trump Tower in New York City, and that I met then Candidate Donald Trump and other members of his family, as well as other dignitaries who visited the building during 2015 and 2016, does not imply any formal arrangement. The fact that as a resident of Florida, and as a member of the Mar-a-Lago Club in Palm Beach, I often use the club facilities (dining) or occasionally attend events at the club or elsewhere in Florida does not imply any association or relationship with the Trump Campaign. The statement that “Mr. Lombardi has worked on political campaigns in Europe” is taken out of contest and at no time and in no situation and I have ever received compensation or payments from any foreign political leaders or political organization.

#2. Cz4T was “co-founded” is erroneous. I joined one of the hundreds of FB groups and pages called Citizens for Trump. For a short time I was listed as co-

founder with Mr. Tim Selaty on his web page. Eventually Mr. Selaty (who lives in Texas and I never met personally) and I parted ways before the GOP convention due to difference of opinions regarding their involvement with individuals like Mr. Roger Stone and others. I am not familiar with Mr. Selaty's work for veterans and I was never associated with the raising of funds for any of his enterprises.

#3. Coalition for Trump was (and I believe still is to this day) but only a Face Book page. I did join the group and did talk to Mr. Robert Jeter during the campaign about sharing the candidate message with other supporters on social media. On one occasion (FB screen shot, attachment 12) Mr. Jeter reached out to me in New York and while in the lobby of Trump Tower met briefly with Mr. Lewandowski. I doubt Mr. Lewandowski knows or even remember Mr. Jeter.

#4. There are no "overlapping organizations," since there is no organization at all other than FB and social media loose chats.

#5. The FB pages and other social media visualizations and chats may have been brought to the attention of individuals serving in the Presidential campaign of Mr. Trump, but to my knowledge there was no acknowledgement from the campaign of any of these grass root activities. If Mr. Jeter statement that he met with then candidate Trump is accurate I certainly did not ever go to Myrtle Beach or facilitate it. The screen shot of myself and Sam Clovis (attachment 14) are from a brief chat in Mar-a-Lago during a pause during breakfast and in no way imply a formal coordination with Mr. Trump campaign. Attachment 15 is also a screen shot from a FB post when Mr. Priebus was in the lobby of the Trump Tower in New York City.

As far as Latinos for Trump and other dozens (or more) FB pages and groups in Los Angeles (I never went to LA) and in other cities, I have absolutely no knowledge of their activities, the people involved or that of hundreds of other FB and other social media "friends" (whose real names I do not know).

#6. Sources of funding for FB pages and groups are not available to me. A FB page is free and does not require funding. I am only aware of chats and conversations had in social media, for which I did NOT solicit funds or did receive any sort of compensation. If other individuals used such platforms to sell gear or support their activities I was never part of. On the contrary, I have posts (I spare you the screen shots) in which I clearly state that any fundraising activity for the Presidential Campaign should be done according to the law and disclosed. If one of the hundreds of pages calling themselves "Bikers for Trump" (some of which I may have followed on FB) did start a fund-raising project, it certainly is not my responsibility or my

interest. If there are, as the complaint alleges, “hundreds of corporations” and fund-raising sites (a very generic and vague statement), I certainly have no interest in their activities. Statements made by Mr. Jeter, regarding his activities, are the sole responsibility of Mr. Jeter (attachments 20,21,22).

#7. Mr. Jeter statements (FB screen shots attachments 23-26) regarding veterans are the sole responsibility of Mr. Jeter.

#8. Foreign sources were NOT sought by me at any time in any situation. I never met Mr. Jack Posobiec and I am not interested or was ever involved with any activities by him, Mr. Selaty or others associated with a FB page called Citizens for Trump. Any activity by these and other individuals is their sole responsibility.

#9. Wrong name. The authors of the complaint erroneously list “Students for Trump” while their own attachment # 30 (another screen shot) clearly reads “REAL STUDENTS FOR TRUMP.” While there are hundreds of FB pages, and websites organized by students who supported the Presidential Campaign, I am only directly involved with Mr. Caleb Thomas, a Florida resident like myself, and with whom I shared messages, pictures and posts. Real students is again just a FB page where friends meet and share. No funds were ever solicited, no contribution or support was ever given to the Presidential Campaign other than posting on the platform.

10-11. Disclaimers posted by others are not my responsibility.

#12. There is absolutely no mention of “Trumpsters United” on my FB page or any other of my social media (Twitter, Instagram). During the Presidential campaign I “followed” (clicked “LIKE”) on hundreds of pages, this does not require me to learn who the administrators of the pages are, nor am I responsible for their behavior. This is by far the most outrageous and unsubstantiated accusation and one for which I may (in the future) retain counsel to prosecute the authors of the complaint. The complaint implies that “Mr. Lombardi may be a co-conspirator” solely on a comment on a FB page (FB screen shot attachment 31). This is a grave accusation and one that is totally groundless. Solely based on someone comment on a social media chat.

Conclusion

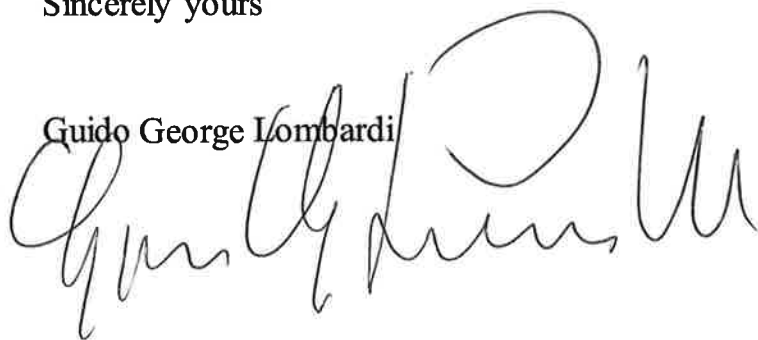
The authors of the complaint fail to bring any real facts or documents supporting their claims. Free platforms on social media are designed to give people the

opportunity to express their opinions, regardless of gender, race, religion, or political affiliation. During any election, and particularly during a Presidential campaign it is more that normal for people to share similar views with friends, on one side of the political divide as well as the other. Words written on a free platform like Face Book, should remain free. If anyone solicits funds, on a free platform or by other means, should follow laws and regulations regarding such activities. Personally, I believe this complaint was made for the sole purpose of generating publicity for its authors and help the sales of their book.

I remain

Sincerely yours

Guido George Lombardi

A handwritten signature in black ink, appearing to read "Guido George Lombardi", written in a cursive style. The signature is positioned below the printed name.