

Federal Election Commission
Office of Complaints Examination
& Legal Administration
Attn: Christal Dennis, Paralegal
1050 First Street, NE
Washington, DC 20463

July 2, 2019

cc. Mr. Jeff S. Jordan
Assistant General Counsel
Complaints Examination & Legal Administration

Re. MUR 7585
MUR 7585 Amendment

Supplement

Ms. Maura Healey, Attorney General
Commonwealth of Massachusetts
1 Ashburton Place, 20th Floor
Boston, MA 02108

Complaint MUR 7585 and Amendment
Trahan Campaign, 2018 Democratic Primary
Third Congressional District, Massachusetts

2019 JUL 11 PM 1:36

FEDERAL COUNSEL

Dear Ms. Dennis and Mr. Jordan:

Thank you for timely responses to my Complaint (March 2019) and Amendment (May 2019), and also for forwarding information on your process for Complaint review, much appreciated. I understand that mine is just one Complaint before you, but this matter involves the election of a candidate through potentially illicit campaign finance contributions, so possibly no more serious matter is before you.

Respectfully, you've given Ms. Trahan too much time to respond. She occupies a seat in Congress with a two-year term, and 1/4th of her term is over. Some voters in the Third Congressional District think her seat was illegally gained and don't understand the long silence from FEC. Others have heard nothing so they think FEC has absolved Ms. Trahan of wrongdoing. It's my understanding that FEC has conducted no investigation yet, since you haven't received a response from Ms. Trahan to the complaints.

This letter is not notarized and is not intended to be forwarded to Ms. Trahan or her counsel because it contains no information not presented in my Complaint and Amendment. This letter is a request for FEC to close the door on the dithering by Perkins Coie, and to consider if an investigation is in order.

FEC's "Description of Preliminary Procedures..." says *"the respondents shall have 15 days to demonstrate, in writing, that no action should be taken against them in response to the complaint."* The "Description..." also says that additional time may be requested, and may or may not be granted by FEC.

It's been 103 days since my original Complaint was docketed by your office. A similar Complaint was later filed by another party. Then I filed an Amendment on May 8, 55 days ago. FEC has been most generous to Ms. Trahan and Perkins Coie as they try to explain the source of funds for an advertising campaign that swung the Democratic Primary to her by just 145 votes, after a recount. We're a long way from "*15 days*."

At some point, and respectfully we've reached that point, it's clear that Ms. Trahan and her legal team can't explain the irregularities. Her OpEd this past April in local media said she wanted to be transparent...then she spoke about growing up in Lowell, delivering newspapers for the Lowell Sun, her volleyball scholarship to GW, being a hard worker... no answers to questions in my Complaint.

Ms. Trahan apparently did not simply fill out some FEC forms incorrectly, all the while having plenty of money to fund her campaign as she claims. There is circumstantial evidence that she misled FEC and the

public, and used her private consultancy to channel illegal contributions into her campaign and win her seat in Congress. At least, she hasn't been able to disprove these things despite multiple amendments to her filings and many weeks of assistance from a top-notch DC law firm.

Here's an example of what I mean: In 2015, 2016 and 2017, she earned \$906,000 from her Concire consultancy company. She reported to FEC that her savings from these earnings totaled \$15,000. But in her April 2019 OpEd, she said that the bulk of her 2018 earnings from Concire (\$265,000) were used to help fund her campaign. So from \$906,000 she had savings of \$15,000, and from \$265,000 she had \$265,000 in savings? How does that work? And who can campaign full-time in 2018, raise two young children, and also work full time? Nobody. Sure, money came into her consultancy, but where's the proof she did any work at all, and who put the money there?

Another example: Ms. Trahan has taken steps to conceal key information which, until the media started asking questions, wasn't confidential, such as her Concire client list. If her clients are confidential, then why did she reveal some of them to the Congressional Roll Call web service two weeks after telling FEC that her client list was off limits? Perhaps her client list is key to this whole mess.

Ms. Trahan claims she delivered speeches as a consultant in 2018 which earned her \$265,000, all the while campaigning full time. Which companies hired her, and did they pay the Consultant or the Candidate - illegally channeling donations to her campaign? I hope Ms. Healey's office will investigate because maintaining a full-time consultancy while running for Congress offers the candidate a clear avenue to obtain illegal contributions.

It appears Perkins Coie was hired to negotiate her Conciliation Agreement. Conciliation is not acceptable to this voter of the Third Congressional District. If I led a Citizen's Petition, a majority of voters might agree. Through this letter, I respectfully ask Ms. Healey's office to be aware of voter concerns for any Conciliation Agreement should FEC find financial improprieties in Ms. Trahan's campaign. She won by 145 votes. Any campaign finance improprieties mean she shouldn't have won.

I've copied Ms. Maura Healey, our Attorney General, and will separately send her my Complaint and Amendment filed with FEC. Certain matters cited above in in my complaint may warrant investigation for possible criminal behavior regarding campaign donations. I understand that FEC's present rules hold all matters in confidence. But I hope her office will request a public airing of FEC's findings on this matter, because the Commonwealth has never experienced a similar situation. Transparency is needed. The voting citizens of the Third Congressional District have a right to know if there was any funny business in who we sent to Washington. If Ms. Trahan cannot explain her campaign finances, her seat should be vacated.

Sincerely,



Gene Blake

Andover, MA 01810