

OFFICE OF
GENERAL COUNSEL

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2019 APR -8 PM 1:01

Palm Beach Gardens, Fl. 33412

MARCH 4, 2019

MUR # 7593**Office of General Counsel**Federal Election Commission
1050 First Street, NE
Washington, DC 20463

To whom it may concern:

This complaint is submitted in accordance with 52 USC sec 30109 (a)(1) and alleges a violation of the FEC campaign finance limitations on corporate contributions to witt: Corporate contributions are prohibited for campaigns for federal office.

FACTS: On or about the 5th of November 2018, in the last campaign rally held by President Trump on behalf of candidates for the United States Senate, more specifically on behalf of the candidacy of Josh Hawley, held in Cape Girardeau Missouri, Sean Hannity, an employee of the Fox News Network appeared with the President on stage to urge the election of Hawley over the Democrat, Claire McCaskill.

It is hereby alleged that as an employee of the Fox New Corporation Hannity was an agent whose actions, in appearing and endorsing a Federal Candidate for the United States Senate were on behalf of and by the Corporation itself. Regardless of whether or not Fox News gave prior approval to the appearance, Mr. Hannity was acting in his capacity as a Fox News Corporate agent and had apparent authority to make statements on behalf of Fox News which statements of endorsement constituted illegal in-kind contributions by Fox News Corp to the campaign of Josh Hawley.

In addition it is alleged that Jeanine Pirro, also a Fox News employee, attended the very same rally referenced above on behalf of the campaign of Josh Hawley and, similarly, urged them to vote for Josh Hawley. In so doing, Jeanine Pirro also acted on behalf of, and as an agent for Fox News

Corporation and in so doing her appearance was the equivalent of an illegal in-kind corporate contribution.

Fox News corporation had the obligation under any interpretation of the FEC campaign contribution limitations, to prohibit it's employees, as a part of their contractual obligation, from contributing to Federal campaigns by delivering to any candidate The Fox News imprimatur which places the Fox News Corporate brand squarely behind the Trump Presidential endorsement of Josh Hawleys candidacy and by so doing bound Fox News Corporation to the illegal in-kind corporate contribution to the Hawley campaign.

The combined appearances of Hannity and Pirro together further makes clear that Fox News Corporation was participating in a campaign rally designed to support the candidacy of Josh Hawley and as such constituted an illegal in-kind corporate contribution.

It is respectfully requested that the FEC deem the campaign appearances by both Sean Hannity and Jeanine Pirro acting as agents having apparent authority to bind Fox News Corporation for their appearances both of which constituted illegal in kind corporate contributions by Fox News and that the FEC find such activity violated the law regarding campaign contribution limitations.

This is not a question of either Mr. Hannity or Mrs. Pirro giving verbal support to a candidacy while on the air. Rather this is an example of Corporate employees traveling to a political rally not necessarily part of a daily or weekly opinion show and advocating the election of a candidate for the US Senate. Nor is the a question of the exercise of free speech by either of the above mentioned parties. It is the conveyance of the Fox News Corp brand by their joint appearance that violates the prohibition on in-kind corporate contributions.

Respectfully submitted, Michael R Edelman Esq.

Palm Beach Gardens, Fl, 33412



Subscribed and sworn to before me on this ____ day of _____, 2019

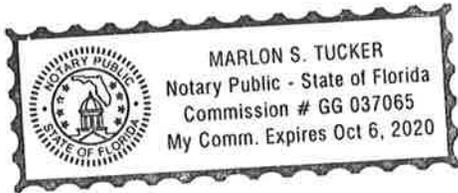
FLORIDA JURAT
FS 117.05

State of Florida
County of Palm Beach }

Sworn to (or affirmed) and subscribed before me this

02 day of April, 2019
Day Month Year

by Michael R. Edelman
Name of Person Swearing or Affirming



[Signature]
Signature of Notary Public — State of Florida

Marlon S. Tucker
Name of Notary Typed, Printed or Stamped

- Personally Known
- Produced Identification

Type of Identification Produced: FL DL #

Place Notary Seal Stamp Above

E345 556 47 3851 Exp: 10/25/2022

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