

Allen J. Epstein

Aug. 14, 2019

Orlando, FL 32808

MUR # 7637

Ellen L. Weintraub-

Chair, Federal Election Commission (FEC)

1050 First Street, NE

Washington, DC 20463

(Email-commissionerweintraub@fec.gov)

(Twitter- @EllenLWeintraub)

Subject: Oversight of Federal Elections

Dear Ms. Weintraub,

This is in response to your letter of Aug. 2, 2019 – which outlined the requirements for a properly filed complaint. I wish to thank your staff for detailing what is needed.

- 1) A) The complaint is about Donald J. Trump's not following or complying with Federal Election Laws, rules or regulations, during his 2016 Campaign. S

B) He also used money (\$30million) that was funneled from Russia to the NRA and then to Mr. Trump's campaign (as per Mueller report Book

- 2) Documentation – A) I checked the FEC website and Donald J. Trump for President, Inc. filed his Form(s) on 6/29/2015.

B) There are numerous articles/stories of Donald J. Trump's awareness of Federal election laws various Organizations (ie-democracy21.org on 6/29/2016 and 7/22/2016) filed complaints with the FEC and DOJ because of Trump's presidential campaign committee soliciting financial support from various parliamentarians in countries around the world. It was also shown that Mr. Trump had a deep understanding of campaign finance laws --- In 1988 he gave testimony for a government integrity commission and in 2000, as part of an investigation by the FEC, papers were filed with the FEC by Herge, Sparks & Christopher, LLP on June 30, 2000 in relation to the investigation by FEC (I have enclosed a

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copy of their letter with the Affidavit of Donald J. Trump as further proof of his knowledge of FEC laws, etc.

3) My full name and address is Allen J. Epstein, , Orlando, FL 32808.

4) The respondent is Donald J. Trump.

5) Sources of information have been included within, as well as citations, dates, etc. Since the Information is in the public domain, I have included what I felt was sufficient, without bulking up The complaint. If there is anything else you want me to supply I will.

I also noted that on June 13, 2019 Chair of the FEC, Ellen L. Weintraub, on FEC letterhead "I would Not have thought that I needed to say this"

"Let me make something 100% clear to the American public and **anyone running for public office:**

It is illegal for anyone to solicit, accept, or receive anything of value from a foreign national in

Connection with a U. S. election (emphasis added by writer). This is not a novel concept.

Electoral intervention from foreign governments has been considered unacceptable since the Beginning of our nation. Our founding fathers sounded the alarm about 'foreign interference, Intrigue, and Influence'. They knew when foreign governments seek to influence American Politics, it is always to advance their interests, not America's. Anyone who solicits or accepts Foreign assistance risks being on the wrong end of a federal investigation. Any political campaign that receives an offer of a prohibited donation from a foreign source should report that offer to the Federal Bureau of Investigation."

Again, these examples are law breaking activities during his campaign.

I consider that his above-mentioned activities made him invalid to ascend to the presidency under your commission's rules, regulations and laws.

I understand that you have to send him notification of this action and under our laws he has a right to defend himself. If he cannot overturn the absolute evidence of his disqualifying actions, I then ask you to rule on his disqualification. Then we can turn to the rules as set down in our laws as to replacing him so that we can get back to the business of our country and restore our place in the global community.

Respectfully,



Allen J. Epstein

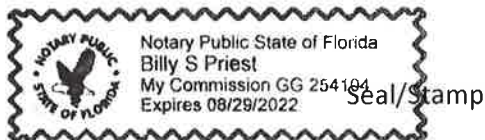
State of Florida

County of Orange

On this 15 day of August, 2019, Allen J. Epstein did swear before me to the contents of this letter and any enclosures. I also identified him through documentation Florida Driver License and this was signed in my presence.

Notary Billy S. Priest

Signature 



HERGE, SPARKS & CHRISTOPHER, LLP**ATTORNEYS AT LAW**

SUITE 360

6862 ELM STREET

MCLEAN, VIRGINIA 22101

(703) 848-4700

June 30, 2000

FACSIMILE NUMBER

(703) 893-7371

J. CURTIS HERGE
ROBERT R. SPARKS, JR.
A. MARK CHRISTOPHER
MATTHEW SCOTT MCCONNELL
CHRISTOPHER T. CRAIG

Certified Mail -
Return Receipt Requested

Lawrence M. Noble, Esq.
General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 5020

Dear Mr. Noble:

This letter is written in furtherance of my letter to you, dated June 16, 2000, in which I confirmed our appearance as counsel to Mark A. Brown, Fred A. Buro, Lawrence Mullin, Donald J. Trump, and Trump Hotels & Casino Resorts, Inc. relative to the complaint filed by Audrey L. Michael, dated May 18, 2000, which has been designated MUR 5020. We enclosed with our letter each of our clients' Statement of Designation of Counsel; and we requested an extension until July 3, 2000 within which to submit this substantive response. By letter to me dated June 20, 2000, the Commission acknowledged our appearance and granted our extension request.

In her complaint, Ms. Michael made the following allegations about our clients:

"On March 27, 2000, according to the Press of Atlantic City, Trump Hotel Casinos and Resorts (sic) held a fundraiser to benefit William Gormley, a candidate for the U.S. Senate. Mr. Mark Brown, Mr. Lawrence Mullin and Mr. Fred Burro (sic) contacted various employees of Trump Hotels and Casino Resorts and solicited and received contributions from 33 employees (list attached) for a total of \$28,800.

"Mr. Brown collected these checks. The checks then were turned over to Mr. Donald J. Trump who presented them to Mr. Gormley.

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"In all cases, employees of these corporations were compelled by senior executives to give to Mr. Gormley's campaign in violation of the Federal Election Law prohibiting 'bundling'."

The foregoing allegations are spurious and totally false.

To evidence the falsity of the allegations in Ms. Michael's complaint and to demonstrate that the Federal Election Commission should take no action against our clients in connection with this matter, we submit to you herewith executed affidavits of Mark A. Brown, Fred A. Buro, Larry Mullin, and Donald J. Trump.¹ Those affidavits overwhelmingly confirm the following:

1. It was Donald J. Trump who personally sponsored, paid for, and hosted in his residence the March 27, 2000 reception for William L. Gormley, a candidate for election to the United States Senate from New Jersey. Contrary to the allegation by Ms. Michael that "Trump Hotel Casinos and Resorts (sic) held a fundraiser to benefit William Gormley" on March 27, 2000, it was in fact Donald J. Trump who personally sponsored the March 27, 2000 reception for Mr. Gormley. (See Trump Affidavit ¶3; Brown Affidavit ¶3; Buro Affidavit ¶3; and Mullin Affidavit ¶3.) Mr. Trump sponsored and hosted the reception in his individual capacity; not as Chairman of Trump Hotels & Casino Resorts. (See Trump Affidavit ¶3.) The reception was held in Mr. Trump's residence. (See Trump Affidavit ¶4; Brown Affidavit ¶¶3 and 8; Buro Affidavit ¶¶3 and 8; and Mullin Affidavit ¶¶3 and 8.) The invitations, food and beverages for the reception were paid for by Donald J. Trump personally. (See Trump Affidavit ¶5.) Mr. Trump was not reimbursed for the costs of the invitations, food and beverages. (See Trump Affidavit ¶6.)

¹ To place these individuals in perspective: Donald J. Trump, is a businessman who, among other roles, serves as Chairman of Trump Hotels & Casino Resorts, Inc. Trump Plaza Hotel and Casino (the "Plaza"), Trump Taj Mahal Casino Resort (the "Taj Mahal"), and Trump Marina Hotel Casino (the "Marina") are subsidiaries of Trump Hotels & Casino Resorts, Inc. In March, 2000, Mark Brown was President of the Taj Mahal; Fred Buro was President of the Plaza; and Lawrence Mullin was President of the Marina. All four entities are located in Atlantic City, New Jersey.

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2. **No executive of Trump Hotels & Casino Resorts, Inc. or its subsidiaries collected or received a contribution to Gormley for Senate from any other employee of Trump Hotels & Casino Resorts, Inc. or its subsidiaries.** Contrary to the allegation by Ms. Michael that "Mr. Mark Brown, Mr. Lawrence Mullin and Mr. Fred Burro (sic) contacted various employees of Trump Hotels & Casino Resorts and solicited and received contributions from 33 employees," no employee of Trump Hotels & Casino Resorts, Inc. or its subsidiaries gave Mr. Brown, or Mr. Buro, or Mr. Mullin, or Mr. Trump his or her contribution to Gormley for Senate. (See Brown Affidavit ¶6, Buro Affidavit ¶6, Mullin Affidavit ¶6 and Trump Affidavit ¶13.) There was a table in the foyer of Mr. Trump's residence which was staffed by Gormley campaign aides. (See Trump Affidavit ¶11.) Reception attendees who contributed to Gormley for Senate delivered their individual checks to the Gormley campaign aides. (See Brown Affidavit ¶9, Buro Affidavit ¶9, and Mullin Affidavit ¶9.) Mr. Brown, Mr. Buro, and Mr. Mullin each delivered his own contribution check to a Gormley campaign aide; but no one of them delivered any third-party's check to Mr. Gormley or to a Gormley campaign aide, because none of them ever received a contribution check from a third-party. (See Brown Affidavit ¶¶6 and 9; Buro Affidavit ¶¶6 and 9; and Mullin Affidavit ¶¶6 and 9.)

3. **Mr. Trump did not present checks from employees of Trump Hotels & Casino Resorts, Inc. or its subsidiaries to William L. Gormley.** Contrary to the allegation by Ms. Michael that Mr. Brown "collected" contribution checks from employees of Trump Hotels & Casino Resorts, Inc. and turned them over "to Mr. Donald J. Trump who presented them to Mr. Gormley," Mr. Brown did not collect any other person's contribution check to Gormley for Senate. (See Brown Affidavit ¶6.) Neither Mr. Brown, nor any other individual, gave Mr. Trump his or her, or any other person's contribution check to Gormley for Senate. (See Trump Affidavit ¶13.) Mr. Trump did not present to William L. Gormley or to any Gormley campaign aide any third-party's contribution check to Gormley for Senate. (See Trump Affidavit ¶14; Brown Affidavit ¶¶10 and 11; Buro Affidavit ¶¶10 and 11; and Mullin Affidavit ¶¶10 and 11.)

4. **No employee of Trump Hotels & Casino Resorts, Inc. was compelled to contribute to Gormley for Senate.** Contrary to the allegation by Ms. Michael that "employees of these corporations were compelled by senior executives to give to Mr. Gormley's campaign," Mr. Trump informed Messrs. Brown, Buro, and Mullin that employees of Trump Hotels & Casino Resorts, Inc. and its subsidiaries were welcome to attend the Gormley reception

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 June 30, 2000
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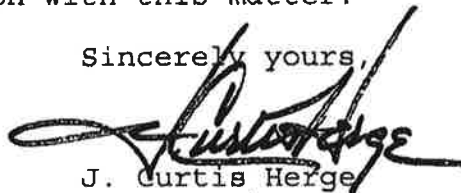
whether or not they contributed to Gormley for Senate. (See Trump Affidavit ¶10.) Messrs. Brown, Buro, and Mullin each told the members of their respective executive committees that a contribution was not prerequisite or a condition to attending the reception. (See Buro Affidavit ¶4 and Mullin Affidavit ¶4.) Mr. Trump did not compel any employee of Trump Hotels & Casino Resorts, Inc. or its subsidiaries to contribute to Gormley for Senate, or to contribute a certain amount, or to attend the reception. (See Trump Affidavit ¶10, Brown Affidavit ¶12; Buro Affidavit ¶12, and Mullin Affidavit ¶12.) Mr. Brown, Mr. Buro, and Mr. Mullin did not compel, pressure or even recommend to any subordinate that he or she should attend the reception, that he or she should contribute to Gormley for Senate, or that he or she should contribute a specific amount to Gormley for Senate. (See Brown Affidavit ¶5, Buro Affidavit ¶5, and Mullin Affidavit ¶5.)

* * * * *

The evidence is clear and compelling that, as to our clients, the allegations contained in the complaint in this matter have no foundation and are without merit. Trump Hotels & Casino Resorts, Inc. did not hold a fundraising event for William L. Gormley; the executives of Trump Hotels & Casino Resorts, Inc. and its subsidiaries did not compel employees to contribute to Gormley for Senate; and no executive of Trump Hotels & Casino Resorts, Inc. and its subsidiaries served as a conduit or intermediary of any contribution to Gormley for Senate. It would be unreasonable and an abuse of discretion to conclude otherwise or to pursue this matter further.

It is respectfully submitted that the Federal Election Commission should take no further action against Mark Brown, Fred Buro, Lawrence Mullin, Donald J. Trump, or Trump Hotels & Casino Resorts, Inc. in connection with this matter.

Sincerely yours,


 J. Curtis Herge

:sbl

Enclosures

AFFIDAVIT OF DONALD J. TRUMP

STATE OF NEW YORK)
) ss:
 COUNTY OF NEW YORK)

I, DONALD J. TRUMP, being duly sworn, hereby make this statement under oath and of my own free will for the purpose of memorializing my knowledge and recollection of the facts and circumstances related to the reception I hosted on March 27, 2000 for William L. Gormley, a candidate for election to the United States Senate from the State of New Jersey.

1. I am a citizen of the United States and I reside at 721 Fifth Avenue, New York, New York, 10022.

2. I am Chairman of Trump Hotels & Casino Resorts, Inc.

3. ~~On~~ Monday, March 27, 2000, I personally sponsored and hosted a reception for William L. Gormley, a candidate for election to the United States Senate from the State of New Jersey. I did so solely in my individual capacity, not in my representative capacity as Chairman of Trump Hotels & Casino Resorts, Inc.

4. The March 27, 2000 reception I sponsored and hosted for William L. Gormley was held in my residential premises at 721 Fifth Avenue, New York, New York, 10022.

5. I paid from my personal funds all the costs of the invitations, food, and beverages for the March 27, 2000 reception I sponsored and hosted for William L. Gormley.

6. I was not reimbursed, in whole or in part, for the costs of the invitations, food and beverages for the March 27, 2000 reception I sponsored and hosted for William L. Gormley.

7. Of the invitations to the March 27, 2000 reception I sponsored and hosted for William L. Gormley, only approximately ten percent (10%) of the total, more or less, were mailed to executives of Trump Hotels & Casino Resorts, Inc. and its subsidiaries. The other invitees were friends and business acquaintances not employed by Trump Hotels & Casino Resorts, Inc. or its subsidiaries.

8. Trump Plaza Hotel and Casino (the "Plaza"), Trump Taj Mahal Casino Resort (the "Taj Mahal"), and Trump Marina Hotel Casino (the "Marina") are subsidiaries of Trump Hotels & Casino Resorts, Inc.

9. In March, 2000, Fred Buro was President of the Plaza, Mark Brown was President of the Taj Mahal, and Lawrence Mullin was President of the Marina.

10. I took no action, of any nature, kind or description, to compel or pressure any employee of Trump Hotels & Casino Resorts, Inc. or its subsidiaries to contribute to Gormley for Senate, or to contribute a certain amount to Gormley for Senate, or to attend the March 27, 2000 reception I sponsored and hosted for William L. Gormley. Conversely, I did inform Messrs. Buro, Brown and Mullin that decisions whether or not to contribute, how much to contribute if one decided to contribute, and whether or not to attend the reception were voluntary and, further, that executives of Trump Hotels & Casino Resorts, Inc.

and its subsidiaries were welcome to attend the reception whether or not they contributed to Gormley for Senate.

11. At the March 27, 2000 reception I sponsored and hosted for William L. Gormley, there was a table in the foyer inside the entrance to my residence which was staffed by Gormley for Senate personnel. Upon information and belief, reception attendees who contributed to Gormley for Senate delivered their contribution checks directly to the Gormley for Senate personnel at the reception table.

12. Approximately one hundred (100) individuals, more or less, attended the March 27, 2000 reception I sponsored and hosted for William L. Gormley.

13. No individual delivered to me personally, or in my representative capacity as Chairman of Trump Hotels & Casino Resorts, Inc., his or her contribution check to Gormley for Senate; and no individual delivered to me personally, or in my representative capacity as Chairman of Trump Hotels & Casino Resorts, Inc., a contribution check to Gormley for Senate drawn by a third party.

14. I did not, before or during the March 27, 2000 reception I sponsored and hosted for William L. Gormley, personally, or in my representative capacity as Chairman of Trump Hotels & Casino Resorts, Inc., deliver to William L. Gormley, or to any Gormley for Senate personnel, a contribution check to Gormley for Senate drawn by a third party.

15. I did not witness any executive of Trump Hotels & Casino Resorts, Inc. or its subsidiaries personally or in his or

her representative capacity deliver to William L. Gormley, or to any Gormley for Senate personnel, a contribution check to Gormley for Senate drawn by a third party.

16. I neither reimbursed, nor caused any other person to reimburse, any employee of Trump Hotels & Casino Resorts, Inc. or its subsidiaries for his or her contribution to Gormley for Senate.

IN WITNESS WHEREOF, I have executed this Affidavit this 26TH day of June, 2000.


DONALD J. TRUMP

Sworn to and subscribed before me
by DONALD J. TRUMP, this 26th
day of June, 2000.


NOTARY PUBLIC

My Commission Expires: _____.

NORMA I. FOERDERER
NOTARY PUBLIC, State of New York
No. 01FO4743494
Qualified in New York County
Commission Expires Sept. 30, 2001

NORMA I. FOERDERER
NOTARY PUBLIC, State of New York
No. 01FO4743494
Qualified in New York County
Commission Expires Sept. 30, 2001