

From: [Don LaBelle](#)
To: [CELA](#)
Subject: MUR 7655
Date: Tuesday, November 12, 2019 9:05:26 PM
Importance: High

FEDERAL ELECTION COMMISSION
OFFICE of COMPLAINTS EXAMINATION
and LEGAL ADMINISTRATION

Att: Christal Dennis, Paralegal
1050 First Street, NE
Washington, DC 20463

RE: MUR 7655

I received the complaint and here is my reply.

First of all, this is clearly a bogus complaint from a known scammer, con-artist and serial abuser of filing misleading complaints with numerous state and federal agencies. The individual filing the complaint, Christopher Paris, has a habit of submitting false complaints to local, state and federal authorities targeting specifically his business competitors.

At your request, I can provide you with examples of the many fictitious complaints filed by Mr. Paris with Attorney Generals, Police Departments, State Health Departments, and other agencies. I'll provide you this material so the FEC can take the necessary legal action against Mr. Paris.

The motive of Mr. Paris is obvious. And that is to burden his business competitors by utilizing and abusing taxpayer resources without any cost to himself. This has long been his modus operandi, and he has failed every time because his complaints always have no merit and a fraudulent motive.

Mr. Paris (aka Mark Erwin) is unable to compete fairly with his business competitors on an equal playing field. Therefore, he weaponizes federal oversight agencies such as the FTC, FAA, FEC, and others to attack his competitors by filing fabricated complaints.

The FEC is already lacking the necessary resources to deal with legitimate violations of campaign finance laws. The Commission should not be wasting its time going after non-political small business owners that have absolutely zero involvement, directly or indirectly in any political campaign, past or present.

My answer to this bogus complaint is clear. I deny all allegations. for the following reasons:

1. I've never collected donations for any political campaign for Daryl Guberman or anyone else.
2. I've never promoted a political campaign for Daryl Guberman or anyone else.
3. I've never purchased and/or distributed any promotional materials to specifically promote a political campaign for Daryl Guberman or anyone else.
4. Neither I or Daryl Guberman has ever announced a run for political office.

Mr. Paris has seriously misled the FEC by knowingly lying about the collection of political donations and falsely claiming such funds was in his words "likely received" by myself or Mr. Guberman without any evidence of such.

Mr. Paris provided irrelevant URL addresses to presses releases and news stories in which he falsely claimed was for the promoting of a political campaign. However, the articles cited in the complaint promote the business entities of myself and other companies associated with Mr. Guberman and have nothing to do with a political campaign.

Further, in attempt to further mislead the Commission, Mr. Paris cited additional URL addresses on news stories associates with parties in which neither I or Mr. Guberman has no involvement. This was done by Mr. Paris in effort to further mislead and confuse the Commission of a campaign that does not exist.

Lastly, I find this complaint nothing more than another deceitful attempt by Mr. Paris to waste the resources of another federal agency and abuse American taxpayers. The Commission needs to hold him accountable or forward this information to the proper authorities. Feel free to contact me or Mr. Guberman for any information you need on this individual's activities.

Respectfully,

Donald LaBelle
Manufacturing Partners
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