



**FEDERAL ELECTION COMMISSION**  
Washington, DC 20463

**VIA ELECTRONIC MAIL**

July 24, 2020

Donald LaBelle  
Manufacturing Partners  
P.O. Box 438  
Oxford, MA 01540

RE: MUR 7655  
Donald LaBelle

Dear Mr. LaBelle:

On October 28, 2019, the Federal Election Commission ("Commission") notified you of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended (the "Act"). On July 15, 2020, based upon the information contained in the complaint and information provided by respondents, the Commission decided to dismiss allegations that you violated provisions of the Act. The Commission then closed its file in this matter. A copy of the General Counsel's Report, which more fully explains the basis for the Commission's decision, is enclosed.

Documents related to the case will be placed on the public record within 30 days. See Statement of Policy Regarding Disclosure of Closed Enforcement and Related Files, 68 Fed. Reg. 70,426 (Dec. 18, 2003) and Statement of Policy Regarding Placing First General Counsel's Reports on the Public Record, 74 Fed. Reg. 66132 (Dec. 14, 2009). If you have any questions, please contact Don Campbell, the attorney assigned to this matter, at (202) 694-1650.

Sincerely,

Lisa J. Stevenson  
Acting General Counsel

A handwritten signature in blue ink, appearing to read "Jeff S. Jordan".

BY: Jeff S. Jordan  
Assistant General Counsel

Enclosure:  
General Counsel's Report

**BEFORE THE FEDERAL ELECTION COMMISSION**  
**ENFORCEMENT PRIORITY SYSTEM**  
**DISMISSAL REPORT**

**MUR:** 7655

**Respondent:** Daryl Guberman  
 Don LaBelle

**Complaint Receipt Date:** October 25, 2019

**Response Date:** November 4, 2019 (Guberman)  
 November 12, 2019 (LaBelle)

**Alleged Statutory** 52 U.S.C. §§ 30102(e)(1), 30103(a), 30104(a), 30116(a)(1)(a), 30118(a)  
**Regulatory Violations:** 11 C.F.R. §§ 101.1, 102.1, 109.10, 110.1(b), 110.9, 114.2

The Complaint alleges that Guberman declared himself a candidate for the 2016 Senate race in Connecticut, but failed to register with the Commission.<sup>1</sup> Additionally, the Complaint alleges that LaBelle, through his press-release-distribution company,<sup>2</sup> made in-kind contributions to Guberman's campaign by preparing and distributing free press releases and registering multiple websites benefitting Guberman.<sup>3</sup>

Guberman responds that he never officially announced plans to run for Senate nor did he receive any donations in support of such a campaign.<sup>4</sup> LaBelle responds that he never collected

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<sup>1</sup> Compl. at 1-2, 5 (October 25, 2019). The Commission's records do not include any registrations filed by Guberman or a committee supporting his candidacy. Similarly, a search of the database of the Connecticut State Elections Enforcement Commission yields no results for Guberman. See <https://seec.ct.gov/eCrisReporting/SearchingCommittee.aspx> (last visited December 18, 2019).

<sup>2</sup> The press-release-distribution company is known by various names, including Manufacturing Partners, MFGPartners.net, Industrial Leaders Group, and industrialPR.net.

<sup>3</sup> Compl. at 1-4.

<sup>4</sup> Guberman Resp. at 1 (November 4, 2019). Guberman's website contains inconsistent messages: it features multiple variations of the phrases "Guberman for Senate," as well as "I've chosen to run as a write-in candidate," and "Candidate for United States Senate." See <http://darylguberman.com/> (last visited December 18, 2019). Also, the site features a "Donate to Campaign" page, with a link for contributions and the statement "Please join me ... by donating to my campaign for United States Senate." See <http://darylguberman.com/donate/>. In contrast, the site also states "at this time I've not yet decided whether or to run for Senate," "potential Candidate for United States Senate," "I am

1 donations for a Guberman campaign, never purchased or distributed any promotional materials to  
2 promote such a campaign, and that neither he nor Guberman ever announced Guberman as a  
3 candidate.<sup>5</sup> We do not have information that indicates Guberman raised or spent over \$5,000  
4 toward a federal campaign.

5 Based on its experience and expertise, the Commission has established an Enforcement  
6 Priority System using formal, pre-determined scoring criteria to allocate agency resources and  
7 assess whether particular matters warrant further administrative enforcement proceedings. These  
8 criteria include (1) the gravity of the alleged violation, taking into account both the type of activity  
9 and the amount in violation; (2) the apparent impact the alleged violation may have had on the  
10 electoral process; (3) the complexity of the legal issues raised in the matter; and (4) recent trends in  
11 potential violations and other developments in the law. This matter is rated as low priority for  
12 Commission action after application of these pre-established criteria. Given that low rating, and the  
13 apparent low dollar amount at issue, we recommend that the Commission dismiss the Complaint  
14 consistent with the Commission's prosecutorial discretion to determine the proper ordering of its  
15 priorities and use of agency resources.<sup>6</sup> We also recommend that the Commission close the file and  
16 send the appropriate letters.

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considering a run," and "if I decide to run for United States Senate." See: <http://darylguberman.com/case-against-senator-blumenthal/>, <http://darylguberman.com/about-me/>.

<sup>5</sup> LaBelle Resp. at 1-2 (November 12, 2019). LaBelle states that the articles cited in the Complaint promote LaBelle's businesses and other companies associated with Guberman, and do not relate to a political campaign. However, these press releases include one identifying LaBelle as Guberman's campaign manager (see <https://prfocus.com/article/Possible-Senate-Candidate-Daryl-Guberman-Calls-Out-Dick-Blumenthal-For-Constitutional-Crisis-52447.html>) and include multiple uses of the terms "U.S. Senate Candidate," and "potential" or "possible Senatorial candidate." See, e.g., <https://www.einpresswire.com/search?query=guberman+senate&search=>; <https://www.airlineindustrytoday.com/2018/05/08/u-s-senate-candidate-daryl-guberman-passionately-calls-for-israeli-pm-netanyahu-to-break-ties-with-iaf/>; <https://medium.com/@riaz.backlink/anglo-japanese-american-aja-registrar-unofficial-accreditation-and-overseen-by-china-led-55459608c01>; <https://www.guberman-quality.com/daryl-guberman-ceo-ct-i-senate-candidate-announces-defund-nist-mep-hits-chicago-evening-post/>

<sup>6</sup> *Heckler v. Chaney*, 470 U.S. 821, 831-32 (1985).

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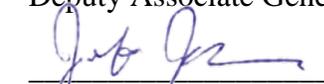
Lisa J. Stevenson  
Acting General Counsel

Charles Kitcher  
Acting Associate General Counsel

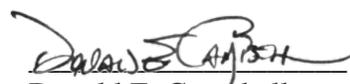
BY:



Stephen Gura  
Deputy Associate General Counsel



Jeff S. Jordan  
Assistant General Counsel



Donald E. Campbell  
Attorney