

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

Nov 8, 2019

Dear Christal,

I am in receipt of the complaint numbered MUR 7656 regarding the Laverne Gore for Congress campaign and I am speaking on behalf of myself, the candidate, and the campaign. You have my apologies for what we believe is a nuisance complaint filed against the Gore committee by Ms. Taylor, who is herself a candidate for the same position.

From our perspective, the timeline of events involving this campaign are as follows:

Oct 18, 2019 – The campaign electronically files a Statement of Candidacy FEC form 2, and concurrently launches a website with an announcement of candidacy. To this point no money has been collected. Even though we are not obligated to file due to being far below the \$5,000 “test the waters” threshold, we decide to file electronically, concluding that usage of the FEC file electronic system would be easier and more transparent. Evidence of this filing appears on the FEC website under Candidate Filings.

At this point, we have a committee name, but we do not have an officially registered committee until FEC 1 is submitted.

Oct 24, 2019 – We receive a Paypal contribution for \$75 directly relating to a link on the website. No bank deposit or other retrieval or usage of this contribution has yet been made, as of this writing.

Oct 24, 2019 The complaint is filed with the FEC and issued as MUR 7656, before the 10 day statutory requirement of filing a ‘Statement of Organization’ for the Laverne Gore for Congress elapses (Nov 3), rendering the most significant charge in the complaint as baseless.

Oct 25, 2019 - The campaign files Statement of Organization (FEC 1) within the 10 day statutory requirement. Believing this to be the formal and official registration of the committee and the first point at which the disclaimer is required, the committee next proceeds to place the disclaimer on the website and on its announcement video. Evidence of this filing appears on the FEC website under ‘Committee Filings’. Evidence of the disclaimers being present is on the Laverne Gore for Congress website at www.LaverneGore4congress.org

Oct 25, 2019 With a registered committee, we now open a bank account for the purpose of depositing checks and campaign contributions received on Oct 23 and totaling \$3,500 (still below the “test the waters” threshold). These checks have been hand-delivered at a Republican Party meeting and were not collected through any links posted on the website.

Nov 6, 2019 We receive a mailing with the MUR 7656 complaint enclosed. The complaint cites that no committee has been formed contrary to the fact that the committee was formed electronically on Oct 25, 2019.

This campaign committee has just started and we do not believe that any criminal activity or even campaign violations have occurred. We certainly have NO idea of whatever the “dark money” comment refers to and we take offense at any accusation as such. We understand the need for the FEC to both regulate these activities and to address all complaints formally, but we do not understand the need for the complainant to contact you before the statutory filing period for FEC 1 even expires.

We respectfully request that you dismiss this complaint based upon the following details:

- The complaint was filed before the expiration date (Nov 2, 2019) for registering the committee under FEC 1 had passed.
- No money for this campaign was received before the FEC 2 filing on Oct 18, 2019.
- Only \$75 was received via the website PayPal link after the candidate filed FEC 2 but before the committee was officially registered on Oct 25, 2019 through FEC 1. Any other money collected since Oct 18 was not collected by virtue of any website activity.
- All disclaimers required by law were placed on relevant materials once the committee was formally registered based upon our belief that a disclaimer should not be used until the committee was formally registered.
- Total receipts and expenditures are still below the \$5,000 “test the waters” limit even though we understand that we waived that alternative status in the interest of formalizing the committee as soon as possible. We mention this to demonstrate how little cash was attributed to campaign contributions over the past three weeks.
- Finally, the video link referenced in the formal complaint does not lead to any Laverne Gore committee material. However, if the complainant was attempting to refer to the announcement video, this is posted on the website and the disclaimer was added when the committee became formally recognized.

We hope this clears up any misunderstanding. We realize that you, like us, have far more important matters to address and we hope that the complainant exercises better restraint in the future.



Peter J. Corrigan
Treasurer, Laverne Gore for Congress

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FEDERAL COUNSEL

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Peter J. Corrigan
Treasurer, Laverne Gore for Congress

10/25/2019

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OFFICE OF
GENERAL COUNSEL

October 25th 2019

2019 OCT 25 PM 12:16

**Federal elections commission
At: Office of General Counsel**

MUR # 7656

1050 FIRST STREET, NE. WASH, DC. 20463

I believe Ohio congressional candidate Lavern Jones-Gore (candidate ID: H00H11098) has violated campaign disclaimer laws and possible campaign finance disclaimer laws by: releasing a video on October 18, 2019 announcing her candidacy for Congress, fails to meet disclaimer requirements. Same side video a company logo at the end possibly of the production company as a form of advertisement. Next same candidate has an live and active website that bears a disclaimer of (Lavern Gore For Congress) but no such committee/s Records are found I believe it doesn't yet exist.

With all of the dark money controlling our government it is important that we follow the rules and stay transparent. Below please find the links to both the website and video in question

Thank you

Website: <https://lavernegore4congress.org/>

Announcement: https://youtu.be/wp0TmXC_W08

SINCERELY,


SHALIRA TAYLOR

Subscribed and sworn to before me
this 24 day of OCT, 19
by SHALIRA TAYLOR



COM EXP 7.2024

Cleveland Ohio 44105