

OFFICE OF
GENERAL COUNSEL

Kelly S. Perine

2020 JAN 23 PM 2:04

Grove City, OH 43123

January 20, 2020

Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463MUR # 7684

Office of the General Counsel:

This letter constitutes a formal complaint against Kate Schroder and any associated campaign committees for a violation of Federal Election Commission (FEC) campaign laws regarding appropriate display of the "Paid For" disclaimer.

There are twelve (12) different incidents that I have documented here, beginning on 07-25-2019 and as recent as 01-18-2020.

While I have started with the oldest incident, consider that this incident reflects a near synchronous start with the campaign of the candidate. Statement of candidacy was filed on 07-09-2019. That appropriate display of the "Paid For" disclaimer is still occurring six months later and has not been addressed shows either a basic lack of knowledge or disregard. Pursuant to the Commission's requirements, I am enclosing three copies, and I affirm that the statements in this document are true, complete and accurate to the best of my knowledge.

Respectfully,

Kelly S. Perine

Kelly S. Perine

Subscribed and sworn before me this 22nd day of January, 2020*Terry L. Howard, Sr.*

Notary Public

My Commission Expires: _____



Date
TERRY L. HOWARD, SR.
NOTARY PUBLIC
STATE OF OHIO
Commission # 215-RE-540-288
My Commission Expires 09-20-2020

Incident #1 – 07-25-2019



Kate Schroder ✓ @KateForCongress · Jul 25, 2019

#ThrowbackThursday to our campaign launch two and a half weeks ago. I will never forget the energy levels in that room. Quick reminder that it is never too late to join ✓ kateforcongress.com #kateforcongress



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This image was taken from the Twitter account of Kate Schroder, @KateForCongress. It is dated 07-25-2019 but the #ThrowbackThursday hashtag and the reference to it being taken during campaign launch two and a half weeks ago indicates an earlier date. Statement of candidacy was filed on 07-09-2019 so it was likely closer to that date. The blue signs do not have the required "Paid for" disclaimer. The white sign has some verbiage near the bottom, but it is not readable, to me, in this photo, nor was it readable on the website itself.

Incident #2 – 07-30-2019



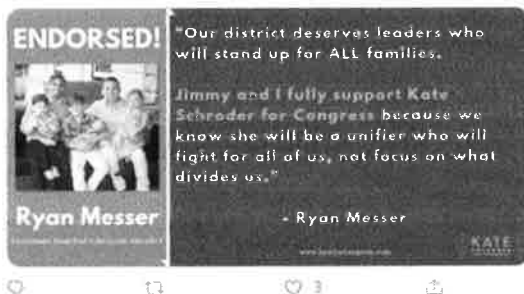
Kate Schroder @KateForCongress · Jul 30, 2019
 .@CecilThomasOH is a model public servant who has made his entire life about bettering his communities. I'm grateful for his support of our campaign! 🇺🇸 kateforcongress.com #kateforcongress



Incident #3 – 07-30-2019



Kate Schroder @KateForCongress · Jul 30, 2019
 Thank you to @RyanMesser for endorsing our campaign! You and Jimmy are such incredible advocates for families all across our district and I look forward to working hard on their behalf 🇺🇸 kateforcongress.com #kateforcongress



Incident #4 – 07-30-2019



Kate Schroder @KateForCongress · Jul 30, 2019
 Thank you to @PGSittenfeld for his support of our campaign! I look forward to working with you to deliver results for the communities of #OH01 #kateforcongress



Incident #2 – The “Kate for Congress” in the bottom right corner does not have the “Paid For” disclaimer. This image was taken from the Twitter account of Kate Schroder, @KateForCongress.

Incident #3 – The “Kate for Congress” in the bottom right corner does not have the “Paid For” disclaimer. This image was taken from the Twitter account of Kate Schroder, @KateForCongress.

Incident #4 – The “Kate for Congress” in the bottom right corner does not have the “Paid For” disclaimer. This image was taken from the Twitter account of Kate Schroder, @KateForCongress.

Incident #5 – 08-03-2019



Kate Schroder @KateForCongress · Aug 3, 2019

Awesome to be back in my home neighborhood of @PleasantRidgeOH for #RidgeDay! Thank you so much to the #kateforcongress contingent who came out to join us www.kateforcongress.com



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This image was taken from the Twitter account of Kate Schroder, @KateForCongress and shows photos of the candidate at a gathering in Pleasant Ridge, Ohio.

The photo in the upper left-hand corner has been selected and is shown enlarged below.

<https://twitter.com/KateForCongress/status/1157692577052159104/photo/1>



The "Kate Schroder for Congress" banner does not have the required "Paid For" disclaimer.

Incident #6 – 09-14-2019



Kate Schroder @KateForCongress · Sep 14, 2019

Thank you for the warm welcome, Warren County! We had a wonderful morning at @imaginemason's Heritage Festival Parade. We were so happy to be a part of this staple in the community 🇺🇸 #KateForCongress



Warren County Dems and 6 others



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This image was taken from the Twitter account of Kate Schroder, @KateForCongress and shows photos of the candidate at the Heritage Festival Parade. The “Kate Schroder for Congress” banner does not have the required “Paid For” disclaimer.

It is unfortunate that Warren County Dems (a Twitter account that links back to <https://www.warrencountydems.org/> the website for the Warren County Democratic Party in Ohio) loved the Tweet and failed to notice the violation.

Incident #7 – 10-04-2019



This image was taken from the Facebook account of Kate For Congress <https://www.facebook.com/KateForCongress2020/> The image appears to be the same one posted to Twitter on 08-03-2019 which was taken in Pleasant Ridge, Ohio.

Reference Incident #5 on Page 4.

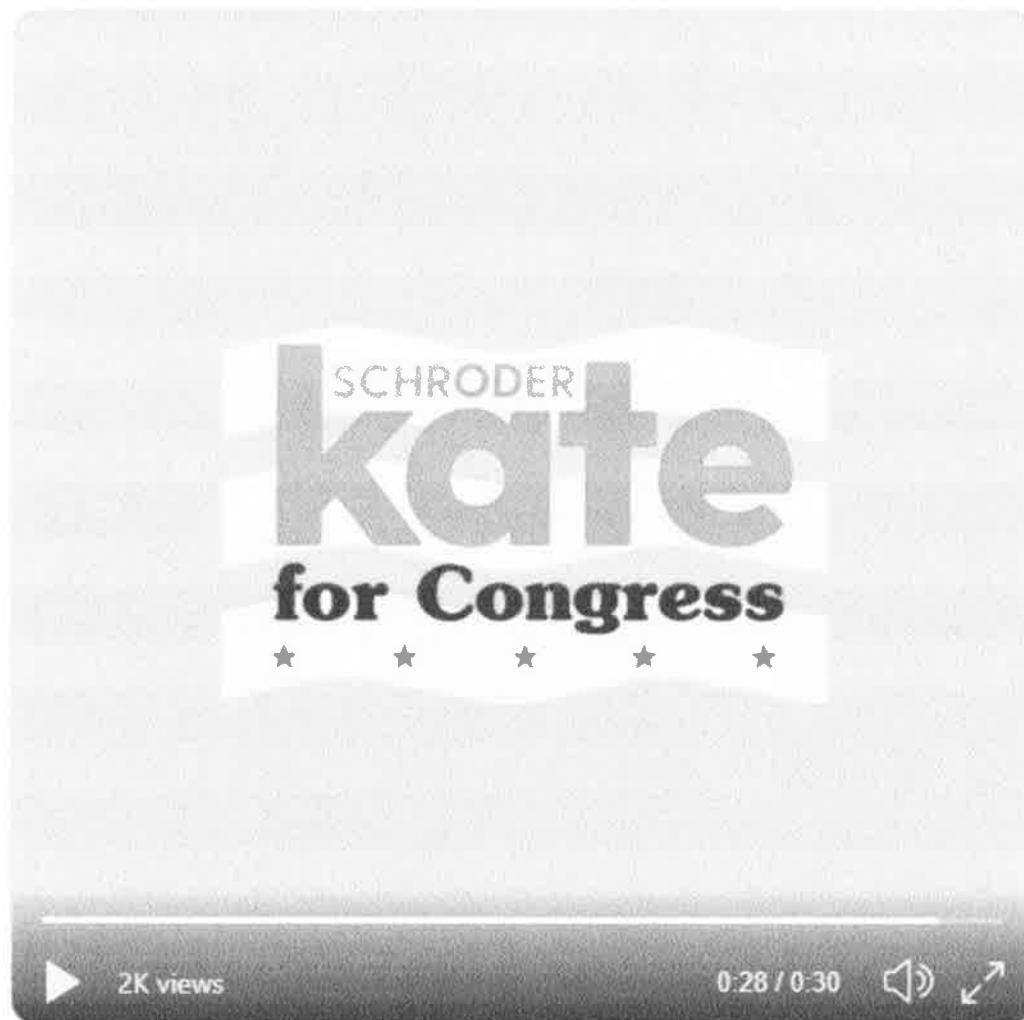
Incident #8 – 11-12-2019



Kate Schroder @KateForCongress · Nov 12, 2019

Elected officials should serve the people they represent, so I'm running for Congress to be the voice of ALL Cincinnatians in District 1.

#nationalrunforofficeday #kateforcongress



This image showing a screenshot of a video that is 0:28 seconds into a 0:30 seconds in length video was taken from the Twitter account of Kate Schroeder, @KateForCongress. It does not display the required "Paid For" disclaimer. No where else in the video is any disclaimer displayed.

Incident #9 – 12-06-2019



Kate Schroder @KateForCongress · Dec 6, 2019

Thank you to everyone who joined us this morning at @kiddcoffeemason and for making our first Coffee with Kate a success! We look forward to our next coffee on December 17th!



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twitter.com/KateForCongress/status/1227859447-photos



These two images were taken from the Twitter account of Kate Schroder, @KateForCongress.

The photos are advertised as being taken as @kiddcoffeemason which is, I believe, <http://www.kiddcoffeemason.com/>, a local coffee and wine bar.

The blue campaign display is missing the required "Paid For" disclaimer.

Incident #10 – 12-29-2019



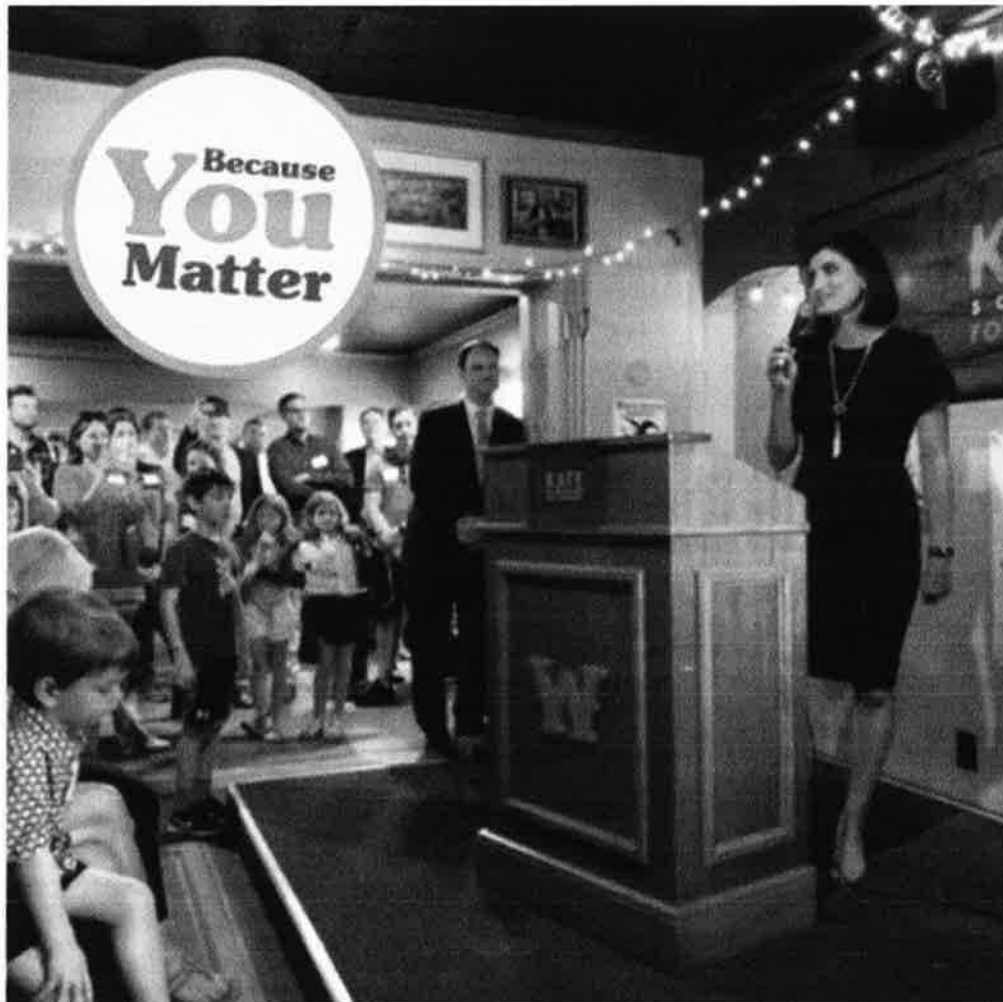
This is a snapshot of a video taken from the Facebook account of Kate For Congress <https://www.facebook.com/KateForCongress2020/>. There is no "Paid For" disclaimer anywhere in the video.

Incident #11 – 01-05-2020

**Kate For Congress**

January 5 at 11:03 AM · 🌐

Every community I've met with while running for Congress has helped me to better understand the problems I'm trying to fix and who I'll be representing. Thank you for sharing your stories with me!



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1 Share

This is an image taken from the Facebook account of Kate For Congress

<https://www.facebook.com/KateForCongress2020/> The location of the event is not known. The smaller banner in front of the candidate does not have the required "Paid For" disclaimer. The cropping of the photo makes it impossible to determine if the larger banner behind the candidate has the required "Paid For" disclaimer or not.

Incident #12 – 01-18-2020



Kate For Congress is at Women's March on Cincinnati. ...

23 hrs · Cincinnati · 🌐

For 4 years we have been marching for better representation in DC. Now it's our turn to show up, to vote, and to get elected! We need more women in office ready to get things done for everyday people. Let's do this!! #KateforCongress @ Women's March on Cincinnati



👍❤️ 101

4 Comments 3 Shares

This is an image taken from the Facebook account of Kate For Congress

<https://www.facebook.com/KateForCongress2020/> The location is somewhere in Cincinnati, Ohio participating in the Women's March on Cincinnati. The banner being carried by the candidate does not display the required "Paid For" disclaimer.