



**From:** [Robin Laurain](#)  
**To:** [CELA](#); [jalp5dai](#); [Catesby](#); [Tom Mair](#); [traversemedia](#)  
**Subject:** MUR 7761  
**Date:** Thursday, August 06, 2020 2:03:47 PM  
**Attachments:** [FEC Response 8 4 20.pdf](#)

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The Green Party of Michigan and myself, Robin Laurain, join the response by Howie Hawkins 2020. Please find attached the response.

Robin Laurain, Co-Chair of the Green Party of Michigan



Digitally signed  
by Kathryn Ross  
Date: 2020.08.06  
13:29:08 -04'00'

VIA EMAIL AND CERTIFIED LETTER

August 5, 2020

Jeff S. Jordan  
Assistant General Counsel  
Complaints Examination & Legal Administration  
Federal Election Commission  
Washington, D.C. 20463

RE: MUR 7761

I am in receipt of your email dated July 22, 2020, regarding a complaint filed with your office by Christine Marie Wilson of Washington, D.C. We are responding to the complaint in this matter in our capacity as the Campaign Manager and Treasurer of the Howie Hawkins 2020 campaign and on behalf of other respondents to MUR 7761, named below, who wish to adopt this response as their own and have signed onto it.

In short, the allegations made by Ms. Wilson do not establish any violations of the Federal Election Campaign Act of 1971, nor does the complaint establish any illegal campaign finance activity, which is within the purview of the Commission. The Commission does not have jurisdiction over internal rules of political parties regarding neutrality or purported conflicts of interest. Therefore, no action should be taken against any individuals or entities named in the complaint. We therefore request that the Commission dismiss the complaint in its entirety, as it is not within the Commission's jurisdiction and does not warrant the use of Commission resources.

To wit:

- Item 2: does not allege any illegal campaign finance activity and fails to describe a violation of the Act.
- Item 3: does not allege any illegal campaign finance activity and fails to describe a violation of the Act.
- Item 4: does not allege any illegal campaign finance activity and fails to describe a violation of the Act.
- Item 5: does not allege any illegal campaign finance activity and fails to describe a violation of the Act.
- Item 6: Exhibit 5 does not allege any illegal campaign finance activity and fails to describe a violation of the Act.

- Item 7: does not allege any illegal campaign finance activity and fails to describe a violation of the Act.
- Item 8: does not allege any illegal campaign finance activity and fails to describe a violation of the Act.
- Item 9: does not allege any illegal campaign finance activity and fails to describe a violation of the Act.
- Item 10: does not allege any illegal campaign finance activity and fails to describe a violation of the Act.
- Item 11: does not allege any illegal campaign finance activity and fails to describe a violation of the Act.
- Item 12: does not allege any illegal campaign finance activity and fails to describe a violation of the Act.
- Item 13: does not allege any illegal campaign finance activity and fails to describe a violation of the Act.
- Item 14: does not allege any illegal campaign finance activity and fails to describe a violation of the Act.
- Item 15: does not allege any illegal campaign finance activity and fails to describe a violation of the Act.
- Item 16: Michael O'Neil is currently neither an employee nor a contractor of the Howie Hawkins 2020 campaign. His last invoice for individual projects was paid before he became an employee of the Green Party of the United States in 2019.
- Item 17: does not allege any illegal campaign finance activity and fails to describe a violation of the Act.
- Item 18: does not allege any illegal campaign finance activity and fails to describe a violation of the Act.
- Item 19: Brendan Phillips is not an employee of the GPUS Ballot Access Committee. This item does not allege any illegal campaign finance activity and fails to describe a violation of the Act.
- Item 20: does not allege any illegal campaign finance activity and fails to describe a violation of the Act.
- Item 21: does not allege any illegal campaign finance activity and fails to describe a violation of the Act.
- Item 22: does not allege any illegal campaign finance activity and fails to describe a violation of the Act.
- Item 23: does not allege any illegal campaign finance activity and fails to describe a violation of the Act.
- Item 24: does not allege any illegal campaign finance activity and fails to describe a violation of the Act.
- Item 25: does not allege any illegal campaign finance activity and fails to describe a violation of the Act.
- Item 26: does not allege any illegal campaign finance activity and fails to describe a violation of the Act.

- Item 27: does not allege any illegal campaign finance activity and fails to describe a violation of the Act.
- Item 28: does not allege any illegal campaign finance activity and fails to describe a violation of the Act.
- Item 29: does not allege any illegal campaign finance activity and fails to describe a violation of the Act.
- Item 30: does not allege any illegal campaign finance activity and fails to describe a violation of the Act.
- Item 31: does not allege any illegal campaign finance activity and fails to describe a violation of the Act.
- Item 32: does not allege any illegal campaign finance activity and fails to describe a violation of the Act.

The complaint centers around a complete lack of understanding of the rules of a particular committee within the Green Party of the United States, which are not binding on anyone who is not an appointed member of that committee, including state party officials or others. The allegations made are false and baseless but even if true would be irrelevant to the FEC. The internal operation of political parties, aside from issues regarding campaign finance, are the purview of the courts and not within the jurisdiction of the Federal Elections Commission.

Please inform us as to the disposition of this matter at your earliest convenience.

Regards,



Andrea Mérida  
Campaign Manager, Howie Hawkins 2020



Travis Christal  
Treasurer, Howie Hawkins 2020

Also on behalf of:  
Green Party of Colorado  
D.C. Statehood Green Party  
Green Party of Michigan  
Mountain Party of West Virginia

Kansas Green Party  
Howie Hawkins  
Brendan Phillips  
Robert Smith  
Kevin Zeese  
Robin Laurain