

February 14, 2023

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

MUR # 7931
Supplement

2023 MAR -8 AM 7:47
OFFICE OF
GENERAL COUNSEL

Re: Supplement 3 to Verified Complaint in MUR 7931.

Dear Sir/Madam:

The Committee to Defeat the President (“The Committee”) hereby supplements its October 8, 2021 Verified Complaint (MUR 7931) with the following additional evidence that President Joseph Robinette Biden, Jr. (“Biden”) is a candidate in the 2024 presidential election. First, in a tweet which links an excerpt from a CNN exclusive with Vice President Kamala Harris, Vice President Harris makes clear that Biden is running for President in 2024. Specifically, she states “Joe Biden is running for re-election and I will be his ticket mate. . . . Full stop. That’s it.”¹



Dana Bash

[@DanaBashCNN](#)



[@VP](#) Harris insists that Joe Biden will be on the top of the ticket in 2024 and she’ll be his running mate. “Full stop. That’s it.” pic.twitter.com/2jGGIqAdrs

6/27/22, 8:07 PM

Vice President Harris’ appearance at the CNN exclusive further constitutes an expenditure of funds (i.e., travel, hair, make-up, clothing) to convey a clear message to the general public about President Biden’s candidacy in the 2024 election.²

¹ <https://twitter.com/DanaBashCNN/status/1541574009418039299>.

² “An individual becomes a candidate for Federal office whenever any of the following events occur: . . . (2) The individual has given his . . . consent to another person to receive contributions or make expenditures on behalf of that individual and such person has received contributions aggregating in excess of \$5,000 or made expenditures aggregating in excess of \$5,000.” 11 C.F.R. § 100.3(a)(2). See also 52 U.S.C. § 30101(2).

Second, the Committee reviewed an article on Taegan Goddard's Political Wire, dated June 27, 2022, which notes Biden's relief that Senator Bernie Sanders said he would not challenge Biden in 2024, and notes "Mr. Biden isn't just intending to run, his aides argue, but he's also laying the groundwork by building resources at the Democratic National Committee, restocking his operation in battleground states and looking to use his influence to shape the nomination process in his favor."³

Biden's White House Press Secretary, Karine Jean-Pierre, has also repeatedly stated Biden is running for President in 2024, including the following:

- "The President intends to run in 2024. we [sic.] are a ways away from 2024. We are going to continue to focus on doing the business of the American people, by delivering for families, as well as lowering costs for families."⁴
- "So, the President intends to run in 2024. We are a long ways away from that. I cannot get into specifics of any political — political election polling because I am behind this podium."⁵
- "The president has said he intends to run," Ms. Jean-Pierre said during the daily White House press briefing. "He's said that multiple times, so there's that. I'll put that out there."⁶
- But here's — okay, so here's — here's what I say — I'll say about this — and, you know, we from — from the podium, I really cannot dive into any election. But I've been really clear, and the President has been asked this question many times, that he intends to run in 2024. He plans to run in 2024. That is way off — like, we are — we are a long ways away from 2024.⁷
- "He intends to run. He intends to run."⁸

³ <https://politicalwire.com/2022/06/27/biden-irked-by-democrats-who-dont-think-hes-running/>.

⁴ <https://www.republicworld.com/world-news/us-news/will-biden-seek-re-election-in-2024-amid-waning-democrats-support-white-house-responds-articleshow.html>.

⁵ <https://www.whitehouse.gov/briefing-room/press-briefings/2022/07/29/press-briefing-by-press-secretary-karine-jean-pierre-july-29-2022/>.

⁶ <https://www.washingtontimes.com/news/2022/aug/1/white-house-insists-biden-will-run-2024-despite-lo/>;
<https://m.youtube.com/watch?v=lvmp7u7kavs>.

⁷ <https://www.whitehouse.gov/briefing-room/press-briefings/2022/08/01/press-briefing-by-press-secretary-karine-jean-pierre-and-national-security-council-coordinator-for-strategic-communications-john-kirby-2/>.

⁸ <https://www.nydailynews.com/opinion/ny-oped-say-whether-or-not-so-joe-20220816-ewc4uexzvnfpvk5zhwoyod2edu-story.html>; <https://nypost.com/2022/08/14/wh-says-we-get-low-biden-poll-numbers-insists-hes-running/>; <https://chicago.suntimes.com/columnists/2022/8/17/23309680/biden-should-speak-fully-on-plans-to-run-2024-column-se-cupp>; <https://www.news-herald.com/2022/08/21/biden-should-speak-fully-on-his-plans-to-run-in-2024-or-not-s-e-cupp/>.

- In her remarks, Jean-Pierre said while Biden's re-election bid was a certainty, the administration's current focus was on the upcoming 2022 midterm elections, which will determine the road to the next presidential election.⁹
- “So, as you know, I’m — I’m very limited on how I can discuss any kind of elections. I will reiterate what we have said many times from here, what the President has said many times, even recently — as recently as the ‘60 Minutes’ interview — is that he intends to run. I don’t have any more announcements on that.”¹⁰

Biden’s senior advisor, Anita Dunn, has also stated Biden intends to run for President in 2024. Specifically, she told the press “the president has said he’s planning on running again. People should take him at his word.”¹¹

Cedric Richmond, a former White House official has also definitively said Biden will run for President in 2024.¹² Specifically, Mr. Richmond stated “[h]e’s running and we’re building an infrastructure for him to run and win,” and “[r]ight now, it’s all an early investment in 2024 while we’re helping 2022.”¹³

Further, in a private conversation at the White House, Biden told Reverend Al Sharpton that he will see a second term.¹⁴ Specifically, he stated “I’m going to do it again” . . . “I’m going.”¹⁵

Biden also joined a toast to his 2024 presidential campaign with President Emmanuel Macron of France at a White House state dinner after Jill Biden told Mr. Macron that “she and her husband are ready for his re-election campaign.”¹⁶

All of these statements are further, supplemental support for the fact Biden is a 2024 presidential candidate, thus necessitating specific filings and amendments—filings and amendments he has continued to fail to make.

Additionally, while Biden’s campaign committee, Biden for President (the “Campaign”) made a purely technical amendment to FEC Form 1 on August 30, 2022, the Campaign has no debt, and thus, no purpose for existing other than to be an authorized campaign committee of a candidate.

⁹ <https://www.presstv.ir/Detail/2022/08/15/687401/US-President-Joe-Biden-2024-Presidential-Race-White-House-press-secretary-Karine-Jean-Pierre>.

¹⁰ <https://www.whitehouse.gov/briefing-room/press-briefings/2022/09/26/press-briefing-by-press-secretary-karine-jean-pierre-september-26-2022/>.

¹¹ <https://www.bloomberg.com/news/articles/2022-08-11/biden-primes-2024-run-eager-to-stop-trump-again-despite-doubts>; <https://www.businessinsider.com/biden-eyeing-2024-reelection-campaign-launch-midterms-2022-8>; <https://www.nydailynews.com/opinion/ny-oped-say-whether-or-not-so-joe-20220816-ewc4uexzvnfpvk5zhwoyod2edustory.html>; <https://chicago.suntimes.com/columnists/2022/8/17/23309680/biden-should-speak-fully-on-plans-to-run-2024-column-se-cupp>; <https://www.news-herald.com/2022/08/21/biden-should-speak-fully-on-his-plans-to-run-in-2024-or-not-s-e-cupp/>.

¹² <https://www.abc27.com/hill-politics/cedric-richmond-on-biden-2024-hes-running/>.

¹³ *Id.*

¹⁴ <https://www.nbcnews.com/politics/white-house/biden-tells-al-sharpton-will-run-president-2024-rcna50556>.

¹⁵ *Id.*

¹⁶ <https://www.nytimes.com/2022/12/06/us/politics/biden-running-president-2024.html>.

The very existence of the Campaign further supports the fact Biden is a 2024 presidential candidate.

Therefore, the Federal Election Commission should cease its unreasonable delay in the face of such blatant illegality and promptly bring enforcement proceedings against Biden; the Campaign; Andrea Wise, in her official capacity as Treasurer of the Campaign; Biden Victory Fund; and Joseph W. Smolskis, in his official capacity as Treasurer for Biden Victory Fund.

Respectfully submitted,



Dan Backer, Esq.
CHALMERS, ADAMS, BACKER & KAUFMAN, LLC
441 N. Lee Street, Suite 300
Alexandria, VA 22314

(202) 478-0750 (facsimile)
dbacker@chalmersadams.com
Counsel for Committee to Defeat the President