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September 16, 2022

Federal Election Commission
Office of Complaint Examination
& Legal Administration
Attn: Roy Q. Lockett
1050 First Street NE
Washington, DC 20463

VIA EMAIL: cela@fec.gov.

Re: MUR 7990 Response to Supplemental Complaint for Kimberly Klacik and Kim Klacik for Congress.

We represent Kimberly Klacik and Kim Klacik for Congress (“KKFC”) (collectively “the Respondents”), in this matter. This Complaint is another disingenuous attempt by Candace Owens and her lawyers to damage Ms. Klacik’s reputation and sway the Court in the midst of a defamation trial. Filing frivolous complaints with the Federal Election Commission (“FEC” or “the Commission”) feigning concern that campaign finance laws are being violated is just another trial tactic by Candace Owens’ legal team. Make no mistake—this is not a complaint based on applicable law and facts. This is a complaint filed in bad faith in an attempt to silence Ms. Klacik in the above-referenced litigation.

Our original response to this Complaint remains unchanged. There would not be a lawsuit but for Ms. Owens’ false allegations regarding Ms. Klacik’s campaign activities. Specifically, Ms. Owens accused Ms. Klacik of “using campaign funds to do cocaine,” using KKFC to engage in money laundering by paying campaign vendors, and specifically accusing her of campaign finance violations, such as falsifying campaign finance reports. These false and defamatory allegations, which have no merit and are based on zero evidentiary support, would not have been made against Ms. Klacik if she had not been a candidate for federal office. Therefore, consistent with long-standing Commission precedent, KKFC’s payment for legal fees associated with the defamation litigation does not constitute personal use.

Therefore, we again ask for the Commission to find no reason to believe and close the file.

Sincerely,

Charlie Spies
Katie Reynolds
Counsel to Respondents