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FEDERAL ELECTION COMMISSION
MAY 9, 2022 4:39 PM
OFFICE OF GENERAL COUNSEL

Theodore Roberts
[REDACTED]

Burlington, KY 41005
Complainant

MUR 7997

Claire Wirth for Congress, Claire Wirth
Respondent

Complaint 1: Failure to Report Cameo Purchase from Tomi Lahren

1. Last year, Claire Wirth for Congress posted a video that appears to be a Cameo of Tomi Lahren, notable pro-choice Republican, endorsing Wirth's campaign.
2. Cameo is a popular internet platform by which individuals can order video clips of celebrities saying whatever the buyer wants them to say.
3. Based on Lahren's phrasing in the video, she does not seem to know who Wirth is. This makes me suspicious that the video may have been purchased by Wirth, her campaign, a volunteer, or another proxy.
4. It is my sincerely held belief that this video was a Cameo purchase either by Wirth or by a Proxy.
5. Despite this, there is no FEC report indicating such a purchase or in-kind contribution.
6. If Wirth's campaign did indeed make the purchase directly or through a proxy, this, in my opinion, puts the campaign in violation of
7. Video of Lahren's cameo and her "endorsement" can be found here:
<https://drive.google.com/file/d/14um3WCRwzBiu9kN471CqUMW3qKJOFioG/view?usp=sharing>

Count 2: Failure to Report Party Van Rental

1. On Friday, November 19, 2021, Claire Wirth for Congress attended the Boone County Republican Party's Christmas Gala.
2. At the end of the event, Wirth departed from this event with Diana Vignes Starr (who would later serve as Wirth's campaign manager and Rhonda Palazzo, candidate for Congress (KY-03) in a Party Van.
3. Photo of Wirth entering this van can be viewed here:
https://drive.google.com/file/d/1zfb3F_ekh77rxxn-oNeT8m5SV3iQMMJI/view?usp=sharing
4. Wirth, that same night, did a campaign livestream from this van.
5. Livestream may be viewed here:
<https://drive.google.com/file/d/1A4LifeJKREotKHgOYvm8MkcL1zdcEBaH/view?usp=sharing>

6. Party van rentals are rather expensive and depend on the day. Most likely, it was a Mercedes-Benz sprinter. [Mercedes-Benz Sprinter Limo - Mercedes Sprinter Limo Bus Rental \(santoslimousine.com\)](https://santoslimousine.com)
7. Because Wirth did not report this expense, there is no way of telling how much was spent on this.
8. Because it is my belief Wirth used this van for transportation for her campaign and as a platform for a livestream, it is a campaign expenditure that should have been reported to the FEC.

Count 3: Failure to Report Venmo Transaction with Francis Carl Rogers

1. On October 10, 2021, Wirth made a venmo payment to Francis Carl Rogers, a Media/Field Representative (I believe now campaign manager).
2. Proof of such transaction may be found here:
https://drive.google.com/file/d/1VZncmdM4vsGAqaO4YwMYQm91qX_vLT2U/view?usp=sharing
3. Proof of Rogers's staff position on Wirth for Congress:
<https://drive.google.com/file/d/1lsggHBbd8EFiEuHlhqYcg5RTVh1QbTj/view?usp=sharing>
4. This transaction was not reported to the FEC.
5. Since Rogers is staff on Wirth's campaign, I believe this should have been reported to the FEC.

Count 4: Failure to Make Proper Disclosures

1. In late March/Early April 2021, Wirth for Congress took out a newspaper Ad in the Oldham Era, a newspaper that is disseminated to all households in Oldham County, KY.
2. The disclaimer on the ad said "Paid for by Candidate."
3. A copy of the ad can be found here:
<https://drive.google.com/file/d/1s4qSP3Zzr6mojY0LoR7cTKowO87hkbU0/view?usp=sharing>
4. The proper disclaimer is "Paid for by Wirth for Congress."
5. It is my belief that this violates campaign finance law.

Count 5: Page Transfer

6. Wirth's congressional campaign page originated as a page called "Thank you Trump," seemingly run by her husband, Christopher Wirth.
7. Page history of names can be found here:
<https://drive.google.com/file/d/1ss6tY-45iv7fuRTFm7a9tWcNPHxZIr8z/view?usp=sharing>
8. Christopher Wirth paid for multiple ads through his personal funds to grow the page.
9. Attached is a screenshot of such ads, including one promoting the vandalism of someone else's property:
<https://drive.google.com/file/d/17K3RG10rG5Y8qLxrXCV6g2IjwDxp03x6/view?usp=sharing>
10. Attached is the Wirth for Congress Ad Library:
[https://www.facebook.com/ads/library/?active_status=all&ad_type=political_and_issue_ads&country=US&view_all_page_id=255746688214369&sort_data\[direction\]=desc&sort_data\[model\]=relevancy_monthly_grouped&search_type=page&media_type=all](https://www.facebook.com/ads/library/?active_status=all&ad_type=political_and_issue_ads&country=US&view_all_page_id=255746688214369&sort_data[direction]=desc&sort_data[model]=relevancy_monthly_grouped&search_type=page&media_type=all)
11. This comingling of private and campaign funds, I believe, warrants investigation.

Conclusion

The FEC should investigate these matters and take all lawful action to address these potential violations.

Theodore J. Roberts

Printed Name

TJ Roberts

Signature

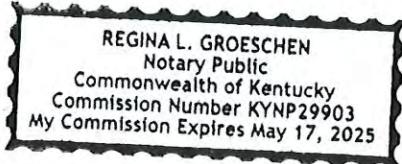
5/9/2022

Date

State of Kentucky

County of Boone

The foregoing instrument was subscribed and sworn before me
this 9th day of May, 2022 by T.J. Roberts, aka. Theodore Joseph Roberts.



Regina L. Groeschen