



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C.

May 7, 2024

[christopherjwirth@gmail.com](mailto:christopherjwirth@gmail.com)

Christopher Wirth  
13520 Ridgemoor Drive  
Prospect, KY 40059

RE: MUR 7997

Dear Mr. Wirth:

The Federal Election Commission (“FEC”) received a complaint that indicates you may have violated the Federal Election Campaign Act of 1971, as amended (the “Act”). A copy of the complaint is enclosed. After further consideration, we are sending an additional notification letter in your individual capacity on the basis that page 2 of the complaint alleges that “Wirth’s congressional campaign page originated as a page called ‘Thank you Trump’ seemingly run by her husband, Christopher Wirth.” We have numbered this matter MUR 7997. Please refer to this number in all future correspondence.

The Act affords you the opportunity to demonstrate in writing that no action should be taken against you in this matter. If you wish to file a response, you may submit any factual or legal materials that you believe are relevant to the Commission’s consideration of this matter. Where appropriate, statements should be submitted under oath by persons with relevant knowledge. Your response, which should be addressed to the General Counsel’s Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with 52 U.S.C. § 30109(a)(4)(B) and § 30109(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. Please be advised that, although the Commission cannot disclose information regarding an investigation to the public, it may share any information you provide with other law enforcement agencies, including the Department of Justice.<sup>1</sup> While the matter remains open, it will remain confidential as set forth above. After the matter is closed, certain documents from the file will be made available to the public on the Commission’s website. To learn more about the agency’s disclosure policy, please see 81 Fed. Reg. 51, 702 (Aug. 2, 2016), <https://www.fec.gov/resources/cms-content/documents/notice2016-06.pdf>.

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address, and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications

<sup>1</sup> The Commission has the statutory authority to refer knowing and willful violations of the Act to the Department of Justice for potential criminal prosecution, 52 U.S.C. § 30109(a)(5)(C), and to report information regarding violations of law not within its jurisdiction to appropriate law enforcement authorities. *Id.* § 30107(a)(9).

from the Commission. Please note that you have a legal obligation to preserve all documents, records, and materials relating to the subject matter of the complaint until such time as you are notified that the Commission has closed its file in this matter. *See* 18 U.S.C. § 1519.

As indicated in the FEC's Notice found at <https://www.fec.gov/legal-resources/enforcement/complaints-process/how-to-file-complaint-with-fec/>, the FEC has largely resumed normal mail operations, but please be advised that processing paper correspondence may be delayed. Accordingly, we strongly encourage you to file all correspondence via email. Any correspondence sent to the Commission, such as a response, must be addressed to **one** of the following (note, if submitting via email this Office will provide an electronic receipt by email):

<u>U.S Postal Service</u>	<u>Delivery Service</u> ( <i>FedEx, UPS, DHL</i> )	<u>Email</u> <a href="mailto:cela@fec.gov">cela@fec.gov</a>
Federal Election Commission Office of Complaints Examination & Legal Administration Attn: Kathryn Ross, Paralegal 1050 First Street, NE Washington, DC 20463	Federal Election Commission Office of Complaints Examination & Legal Administration Attn: Kathryn Ross, Paralegal 1050 First Street, NE Washington, DC 20002	

If you have any questions, please contact Kathryn Ross at (202) 694-1650. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

*Wanda D. Brown*

Wanda D. Brown  
Assistant General Counsel  
Complaints Examination &  
Legal Administration

Enclosures:

1. Complaint
2. Procedures
3. Designation of Counsel

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

Theodore Roberts

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](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](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*

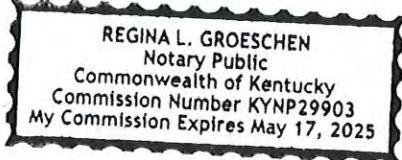
Signature

*5/9/2022*

Date

State of Kentucky  
County of Boone

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



*Regina L. Groeschen*