

Stephen Houlahan, Candidate  
Stephen Houlahan for Congress  
FEC ID C00764027  
PO Box 710175  
Santee, CA 92072

This is in response to the complaint filed with the Federal Election Commission numbered Matter Under Review (MUR) 8173.

Much of the September 25, 2023 complaint filed by Mr. Rascon is a reiteration of a previous complaint that was filed in June of 2022 that is still working its way through the Commission's complaints process. Outside of Mr. Rascon's lack of patience on the matter, many of the new grievances listed are either untrue on their face or are regarding small clerical errors that are easily corrected and do not cause confusion among voters.

Directly following the full text of his initial complaint, Mr. Rascon begins by claiming, with no evidence, that the Houlahan campaign continued to use signage and banners without disclaimers. As discussed in the Committee's response to MUR 8005, the campaign purchased stickers containing a letterboxed disclaimer and recalled all possible campaign materials lacking the disclaimer in order to apply them. Following this fact being brought to the attention of the campaign, all new campaign signs and banners were printed with a message reading "Paid for by Stephen Houlahan for Congress" inside of a text box. While it is possible that a few signs may have avoided recall, the campaign took every effort to ensure that the disclaimer sticker was placed on as many incorrect signs as possible.

The complaint also lists that there were no listed penalties for an "unreported GoFundMe". As previously stated in the committee's response to MUR 8005, the GoFundMe in question has no association with the Committee in any way, nor were those funds ever received by the committee.

Regarding the complaint that the committee's campaign finance reports still list the 50<sup>th</sup> district is a fair one. While the committee has the 48<sup>th</sup> district correctly listed on its' Form 1 Statement of Organization, this finance report oversight was caused by not updating the district number in the FEC File software that the committee files its campaign finance reports. This clerical error has been updated, and the most recent October Quarterly 2023 has been amended to reflect this issue. If there is in fact confusion with voters or the Commission on this matter, the Committee will amend this value on all reports to ensure a more accurate public record. With this value corrected in the software, all future reports will accurately list the committee's district as California's 48<sup>th</sup>.

The complaint's next contention is spurious on its face. The complaint acknowledges that the lawsuit in question is in no way connected to the congressional campaign. As such, these supposed "in-kind donations" would not be reported on a campaign finance report. The complaint then goes on to claim, once again with no evidence, that this legal assistance was given to Mr. Houlahan as a favor to him as a congressional candidate. Not only is this entirely untrue, but Mr. Rascon fails to note another reason that Van Collinsworth assisted with this lawsuit, namely that Mr. Collinsworth was also a defendant in the lawsuit in question.

Mr. Rascon goes on to complain that the committee uses a third-party compliance company's email on its Statement of Organization. As the Commission is aware, this practice is common place

among congressional committees. This can be evidenced by the fact that on the Statement of Organization for Darrell Issa for Congress, a committee that Mr. Rascon later goes on to praise, lists its committee e-mail as [info@campaign-compliance.com](mailto:info@campaign-compliance.com).

The complain then lists another clerical error that, at the time of writing, has been corrected. Mr. Houlahan's Form 2 now correctly states that he is running in 2024 for California's 48<sup>th</sup> Congressional District.

Finally, Mr. Rascon makes a series of confusing remarks regarding robocalls, unreported contributions, and "expenses [that] don't add up". The Commission can be assured that all contributions, including those from fundraising events, and expenses have been disclosed on the committee's campaign finance reports as required by law. The only specifics listed in this section are a stay at the Residence Inn by Marriott Los Angeles L.A. Live. Mr. Houlahan attended a candidate event held by the California Democratic Party in Los Angeles for Democratic Candidates across the state to better connect with voters, other candidates, and potential donors. This lodging disbursement was connected to the candidate's attendance at this event.

Thank you for your consideration. If the commission has any additional requests for information, please contact the committee as soon as possible.

Sincerely,

*Stephen Houlahan*

Stephen Houlahan, Candidate

Stephen Houlahan for Congress