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October 19, 2022

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Roy Q. Lockett  
Acting Assistant General Counsel  
Complaints Examination & Legal Administration  
Federal Election Commission  
1050 First Street, NE Washington, DC 20463  
Attn: Kathryn Ross, Paralegal

**RECEIVED**

By OGC-CELA at 4:54 pm, Oct 20, 2022

Re: MUR 8047.

Dear Mr. Lockett,

This letter is the response to the Complaint received by the Federal Election Commission alleging that our client, Mr. Chuck Gray ("Mr. Gray"), may have violated the Federal Election Campaign Act of 1971, as amended. Specifically, the Complaint alleges, absent evidence or corroboration, that loans Mr. Gray made to his own election campaign constituted illegal campaign contributions.

With this response, we respectfully submit that the Complaint should be dismissed and that no further action should be taken against Mr. Gray in this matter. Due to the sensitive personal financial information set out herein, we request that this response and matter remain confidential pursuant to 52 U.S.C. § 30109(a)(4)(B) and § 30109(a)(12)(A).

### A. THE COMPLAINT:

The August 2, 2022, Complaint was filed by Max Maxfield, a former State of Wyoming Secretary of State. The Complainant speculates that the income Mr. Gray declared on the Financial Disclosure Report — filing ID #10048920 and filed with the Clerk of the House of Representatives on May 16, 2022 — was insufficient in 2021 and 2022 to afford Mr. Gray to loan his campaign, from his own personal funds, \$298,318. The Complainant further speculates, absent evidence or corroboration, that the funds Mr. Gray loaned to his campaign must have originated from a third party; suggesting that his father, Jan Charles Gray, was the source of funds.

### B. RESPONSE:

The Complaint should be dismissed because the funds Mr. Gray loaned to his campaign committee were his own funds originating from inheritance moneys he received in 2017 and thereafter in 2021.

First, on March 30, 2021, Mr. Gray loaned his campaign committee \$125,000. The source of the funds for this loan were moneys he received from a family trust (liquidated in 2017). That trust was originally set up in 2017, or earlier, by Mr. Gray's grandfather, Siegfried C. Ringwald. That trust listed Mr. Gray as a beneficiary. We note that on the advice of legal counsel, Mr. Ringwald liquidated that trust at the end of 2017 and transferred the proceeds (approximately \$250,000) directly to Mr. Gray. This is the source of funds for the \$125,000 loan to Mr. Gray's campaign committee.

Second, on June 29, 2021, Mr. Gray loaned his campaign committee \$165,000. The source of the funds for this loan were moneys he received as an inheritance. We note that, on December 19, 2020, and after an amazing life and career, Mr. Gray's grandfather, Mr. Ringwald, passed away at the age of 94. He was survived by his two daughters (Lydia and Anita) and his two grandchildren (Alexis R. Gin and Mr. Gray). Specifically, Mr. Ringwald's Last Will and Testament provided for his children and grandchildren, including Mr. Gray. Upon the liquidation of the testamentary estate, Mr. Gray received approximately \$550,000 — from several distributions between May 28, 2021, and June 1, 2021. The distributions were made to Mr. Gray by the Executor and Trustee of Mr. Ringwald's estate. This is the source of funds for the \$165,000 loan to Mr. Gray's campaign committee.

We note that at the time of Mr. Ringwald's death, Mr. Gray had been a member, since 2016, of the Wyoming House of Representative for House District 57. On March 4, 2021, Mr. Gray announced his decision to run for Wyoming's lone congressional seat, then held by Liz Cheney. Mr. Gray suspended his campaign for Congress on September 14, 2021.

#### C. FINANCIAL DISCLOSURE REPORT:

On May 16, 2022, Mr. Gray filed the required Financial Disclosure Report for the period of January 1, 2021, through April 30, 2022. The information he provided was true, accurate and complete noting that Schedule A discloses Assets and Unearned Income, valued at \$147,006 to \$430,000. Although Mr. Gray had received approximately \$550,000 in 2021 from his grandfather, such income is not required to be reported pursuant to an exclusion for funds or property received by inheritance or bequests. *See, U.S. House of Representatives, Committee on Ethics, Instruction Guide, Financial Disclosure Statements and Periodic Transaction Reports (2021) (bequests and inheritances are not required to be reported)*. Further, bequests and inheritances are excluded from Schedule B. *Id.* page 29.

We note that pursuant to Mr. Gray's due diligence in completing the Financial Disclosure Report, he personally consulted with House Ethics personnel who confirmed for him that this inheritance was not reportable.

#### D. CONCLUSION:

We respectfully submit that the facts and evidence in this matter conclusively establish that the Complaint should be dismissed with no action. At all times during Mr. Gray's contemplation to run for office and during his campaign, he has properly acted regarding his reporting and disclosure obligations. The Complaint on its face is speculative and absent corroboration or evidence. The Complaint should be dismissed.

If there are any further questions we may address or any documentation you require, please let us know.

Best Regards,



Oberheiden, P.C.