

**RECEIVED****By OGC/CELA at 7:28 pm, Apr 05, 2024****BakerHostetler**

Baker&amp;Hostetler LLP

Washington Square, Suite 1100  
1050 Connecticut Avenue, N.W.  
Washington, DC 20036-5403T 202.861.1500  
F 202.861.1783  
www.bakerlaw.comTrevor M. Stanley  
direct dial: 202.861.1551  
tstanley@bakerlaw.com

April 5, 2024

**VIA E-MAIL**Federal Election Commission  
Office of Complaints Examination  
and Legal Administration  
Attn: Kathryn Ross, Paralegal  
1050 First Street, NE  
Washington, DC 20463*Re: MUR# 8219: Thomas E. Montgomery, III v. Tief Gibbs Jensen 4 Congress 2024*

Dear Ms. Ross:

We represent, on a pro bono basis, Tief Gibbs Jensen 4 Congress 2024 and Staci Goede, Treasurer, Tief Gibbs Jensen 4 Congress (collectively "Jensen"). We have reviewed the allegations in the Complaint filed by Mr. Montgomery, and we respond as follows:

On January 16, 2024, Jensen purchased 2000 doorhangers for \$335.25. *See* Exhibit A, Declaration of Staci Goede at ¶2. The doorhangers were given to volunteers to distribute to voters. *Id.* at ¶3. Because Jensen's campaign was staffed entirely by volunteers and had no paid staffers, Jensen initially failed to notice that the doorhangers arrived without the required disclaimer. *Id.* at ¶4-5. At some point during the distribution of the doorhanger, the candidate herself noticed that the disclaimer was missing. *Id.* at ¶6. Jensen then notified the handful of volunteers passing out doorhangers to stop distributing the door hangers and to destroy them. *Id.* at ¶7. Jensen does not know the number of doorhangers distributed to voters. *Id.* at ¶8.

As noted above, the doorhanger did not include the language "Paid for by" as required by the Federal Election Campaign Act of 1971. The doorhanger did, however, include Jensen's website, her email address, and her phone number. In addition, the Complainant did not suffer any confusion over the fact Jensen paid for and distributed the doorhangers.

The election is now complete, and Jensen's campaign account balance will be less than \$500 after processing outstanding refunds. *Id.* at ¶9. The campaign is not aware of any other instances where material was distributed without a proper disclaimer. The campaign adhered to the disclaimer requirements throughout the primary campaign and the oversight in this instance was not intentional. *Id.* at ¶10.

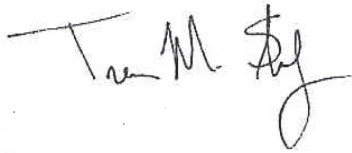
April 5, 2024

Page 2

Should the Commission wish to pursue this complaint, Jensen respectfully requests that this Complaint be referred for Alternative Dispute Resolution for resolution by a Conciliation Agreement.

Thank you for your consideration of this request. Please let me know if you have any questions or need any additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Trevor M. Stanley". The signature is written in a cursive, flowing style with a large, stylized "S" at the end.

Trevor M. Stanley

# EXHIBIT A

BEFORE THE  
FEDERAL ELECTION COMMISSION

Declaration of Staci Goede

I, Staci Goede, declare under penalty of perjury that the following is true and accurate:

1. I am the Treasurer for Tief Gibbs Jensen 4 Congress 2024. The statements in this declaration are based upon my personal knowledge to the best of my recollection.
2. On January 16, 2024, the campaign purchased 2000 doorhangers for \$335.25.
3. The doorhangers were given to volunteers to distribute to voters.
4. The campaign had no paid staffers.
5. The volunteers distributed doorhangers to voters.
6. After volunteers started distributing the doorhangers, the candidate noticed there was no disclaimer on the doorhangers.
7. The candidate notified the handful of volunteers passing out doorhangers to stop distributing the door hangers and to destroy them.
8. Nobody on the campaign knows the number of doorhangers distributed to voters.
9. The campaign bank account will have a balance of less than \$500 after processing outstanding refunds.
10. I am not aware of any other instances where material was distributed without a proper disclaimer. The campaign adhered to the disclaimer requirements throughout the primary campaign and the oversight in this instance was not intentional.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

By: Staci Goede  
Staci Goede

Date: April 5, 2024