

RECEIVED

By OGC/CELA at 9:19 pm, Jul 08, 2024

VENABLE LLP600 MASSACHUSETTS AVE., NW WASHINGTON, DC 20001
T 202.344.4000 F 202.344.8300 www.Venable.com

July 8, 2024

Ronald M. JacobsT 202.344.8215
F 202.344.8300
RMJacobs@Venable.com**DELIVERED VIA ELECTRONIC MAIL**

Wanda D. Brown
Assistant General Counsel
Complaints Examination & Legal Administration Federal Election Commission
1050 First Street, N.E.
Washington, DC 20463

Re: *Response to MUR 8254 for Matt Ricchiazzi*

Dear Ms. Brown:

This letter responds on behalf of Matt Ricchiazzi to the baseless Complaint filed by Defend the Vote (the “Complainant”) filed on May 1, 2024.

The Complaint alleges that Mr. Ricchiazzi violated the Federal Election Campaign Act of 1971, as amended (the “Act”) and Federal Election Commission (the “Commission”) regulations with his publication of *The South Bay Chronicle* and a direct mail piece (“The Stone Mailer”). The Complaint argues that both were coordinated with the Charlene Nijmeh for Congress 2024 campaign and that they did not contain the proper disclaimers. In addition, if they were not coordinated, then they allegedly were not reported correctly.

The Complaint should be dismissed with no further action. As detailed in this response, Mr. Ricchiazzi’s reporting in *The South Bay Chronicle* is exempt under the media exemption, and the costs of reporting on and publishing *The South Bay Chronicle* do not constitute a “contribution” or “expenditure” under the Act and Commission Regulations. The Commission has consistently avoided content-based distinctions or intrusions into editorial decision-making, which would violate his First Amendment rights.

Moreover, the Complaint’s conclusory allegations of coordination between Ms. Nijmeh, the Committee, and Mr. Ricchiazzi are similarly meritless. Mr. Ricchiazzi served as an unpaid volunteer for the campaign and was therefore not an agent or former employee of the campaign. At no point did he have the ability, express or implied, to act on behalf of the Committee, nor was Mr. Ricchiazzi ever employed by the Committee.

Federal Election Commission

July 8, 2024

Page 2

Finally, to the extent that The Stone Mailer did not have exactly the right disclaimer and was not reported in a timely fashion, the Commission should exercise its prosecutorial discretion to dismiss the Complaint or perhaps send a letter of admonishment to ensure future compliance.

FACTUAL BACKGROUND

Mr. Ricchiazzi is a citizen-journalist, writer, publisher, and activist who supports indigenous people. He is well-known as a publisher of small newspapers that he distributes himself. He has several day-jobs involving service to indigenous people. He volunteered for the Nijmeh campaign, but never held any paid role and never had “agency” authority there.

Mr. Ricchiazzi works for the Green Education Foundation as the Chief of Staff, and in support of the Muwekma Ohlone Tribe (the “Tribe”).¹ The Green Education Foundation (the “GEF”) is a nonprofit organization that is tax-exempt under Section 501(c)(3) and serves to educate students and the general public on providing for an environmentally safe society.² Charlene Nijmeh is the Chairwoman of the Tribe and the GEF. In his work for the GEF, Mr. Ricchiazzi has helped the GEF advance its charitable mission with program development work, RFP responses and business proposals, and legislative affairs, among other initiatives. In his work for the Tribe, Mr. Ricchiazzi has helped the Tribe affirm its federal status by developing legislative affairs strategies, advance its judicial strategies in light of rulings pertaining to the Tribe’s sovereign immunity, and cultivate and structure nation-to-nation relationships in Indian Country.

While Mr. Ricchiazzi serves as Chief of Staff for the GEF and the Tribe, he did not and does not serve as a Chief of Staff for Nijmeh personally or for the Committee.³ Mr. Ricchiazzi was one of dozens of volunteers who briefly volunteered as an unpaid volunteer for the Committee.⁴ He volunteered as a canvasser, went door knocking, passed out hangers, and helped with sign-in sheets at various events. He never received compensation for his volunteer efforts and had no formal title or campaign role.⁵ He also never performed any

¹ Exhibit A, Ricchiazzi Decl. ¶ 1.

² Green Education Foundation (EIN: 45-2552544), [IRS Form 990](#) for fiscal year 2022.

³ Exhibit A, Ricchiazzi Decl. ¶ 2.

⁴ *Id.* ¶ 3.

⁵ *Id.*

Federal Election Commission
July 8, 2024
Page 3

volunteer efforts on the GEF or Tribe time.⁶ He was not given any authority to act as an agent, and had no authority to act on behalf of the Committee.⁷

Mr. Ricchiazzi periodically publishes newspapers focused on political and policy discourse on issues critical to our communities' quality of life and American advancement, under various mastheads, including *The City Politic* (2010-12), *The Buffalo Chronicle* (since 2014), and *The South Bay Chronicle* (2024).⁸ He currently maintains several digital publications including BuffaloChronicle.com and SFinquirer.com, which produce news journalism, entertainment content, political commentary, satire, and other content.⁹ He also operated now-defunct domains including BostonSunday.com, WashingtonInquizitor.com, SenecaPost.com, and TheCityPolitic.com.¹⁰ Mr. Ricchiazzi has been publishing on political and policy discourse issues for more than 14 years.

Mr. Ricchiazzi currently operates his own publications; however, he previously worked as a paid journalist for *The Niagara Falls Reporter*, *Artvoice*, *The South Buffalo News*, and *The Lackawanna Front Page* from 2015-2016.¹¹ He was an unpaid regular contributor to *Buffalo Rising* from 2010 to 2014.¹²

As a citizen-journalist, Mr. Ricchiazzi does not have a separate legal entity under which he runs his publications.¹³ Mr. Ricchiazzi self-funds his publications, exercises final editorial and formatting control over the content of his publications, and Mr. Ricchiazzi's websites and newspapers are accessible to the public free of charge.

ARGUMENT

⁶ *Id.* ¶ 8.

⁷ *Id.* ¶ 10.

⁸ *Id.* ¶¶ 6, 8; *see* Exhibit C.

⁹ *Id.* ¶ 7.

¹⁰ *Id.*

¹¹ *Id.* ¶ 10.

¹² *Id.*

¹³ *Id.* ¶ 9.

Federal Election Commission
July 8, 2024
Page 4

We now address each of the allegations in the Complaint, beginning with *The South Bay Chronicle* and why it fits within the media exemption.

I. *The South Bay Chronicle* falls within the Media Exemption.

The Act and Commission Regulations generally exempt press activities from regulation.¹⁴ Specifically, 52 U.S.C. § 30101 provides that “any news story, commentary, or editorial distributed through the facilities of any broadcasting station, newspaper, magazine, or other periodical publication,” are exempt from the definition of regulated expenditures under the Act unless such facilities are owned or controlled by any political party, political committee, or candidate.¹⁵ Similarly, 11 C.F.R. § 100.73 exempts “[a]ny cost incurred in covering or carrying a news story, commentary, or editorial by any broadcasting station (including a cable television operator, programmer or producer), Web site, newspaper, magazine, or other periodical publication, including any Internet or electronic publication” from the Act’s definition of contribution unless the facility is owned or controlled by any political party, political committee, or candidate.¹⁶

To determine whether activities are protected by the media exemption, the Commission applies the two-step “*Readers Digest*” analysis: First, it asks whether the entity engaging in the activity is a “press entity.” If so, the Commission then considers whether the press entity is owned or controlled by a political party, political committee, or candidate and whether the entity is acting in its “legitimate press function.”¹⁷ In applying this analysis, the

¹⁴ Recognizing the “special and constitutionally recognized role” of the press “in informing and educating the public, offering criticism, and providing a forum for discussion and debate,” *First Nat’l Bank of Bos. v. Bellotti*, 435 U.S. 765, 781 (1978), the press exemption was intended to ensure that enforcement of the Act would not “limit or burden in any way the first amendment freedom[] of the press” and would protect “the unfettered right of the newspapers, TV networks, and other media to cover and comment on political campaigns.” Advisory Opinion 2019-05 (System73) (quoting H.R. Rep. No. 93-1239, 93d Cong., 2d Sess. at 4 (1974)).

¹⁵ 52 U.S.C. § 30101(9)(B)(i); *see also* 11 C.F.R. § 100.132 (“Any cost incurred in covering or carrying a news story, commentary, or editorial by any broadcasting station (including a cable television operator, programmer or producer), Web site, newspaper, magazine, or other periodical publication, including any Internet or electronic publication, is not an expenditures unless the facility is owned or controlled by any political party, political committee, or candidate[.]”).

¹⁶ 11 C.F.R. § 100.73.

¹⁷ Advisory Opinion 2005-16 (Fired Up!) at 4 (citing *Reader’s Digest Assoc. v. FEC*, 509 F. Supp. 1210, 1215 (S.D.N.Y. 1981)); *see also* Advisory Opinion 2016-01 (Ethiq) at 2-3 (reaffirming two-step *Reader’s Digest* framework).

Federal Election Commission
July 8, 2024
Page 5

Commission considers whether the entity's materials are available to the general public and whether they are comparable in form to those ordinarily issued by the entity.

A. Mr. Ricchiazzi is a "Press Entity."

Although neither the Act nor Commission Regulations define "press entity," the Commission has explained that "when determining whether the term applies to a particular entity, the Commission has focused on whether the entity in question produces on a regular basis a program that disseminates news stories, commentary, and/or editorials."¹⁸ In addition, the Commission has not limited the definition of "media entity" to "traditional news outlets," but rather has applied it to "news stories, commentaries, and editorials no matter in what medium they are published."¹⁹

The Complaint alleges that *The South Bay Chronicle* is not operating under any economic model used by the recognized press. Complainant states that it does not charge a subscription fee, nor does it seem to have advertising revenue. The Complainant also notes that *The South Bay Chronicle* does not include a "masthead" like a traditional newspaper, and the name "The South Bay Chronicle" does not appear on the California Secretary of State's website.²⁰

"Congress enacted the media exemption to ensure that the Act would not 'limit or burden in any way the first amendment freedoms of the press' and would protect 'the unfettered right of the newspapers, TV networks, and other media to cover and comment on political campaigns.'"²¹ The Commission has explained that the press exemption applies to a wide variety of online and offline activities.²² In the *Explanation and Justification for the Regulations on Internet Communications*, the Commission concluded that "[b]loggers who are covering and reporting news stories in the same way that traditional media entities have reported newsworthy events are entitled to the same media exemption protection that applies

¹⁸ Advisory Opinion 2019-05 (System73) at 4 (quoting Advisory Opinion 2008-14 (Melothe) at 4); see also Advisory Opinion 2016-01 (Ethiq) at 3.

¹⁹ Advisory Opinion 2008-14 (Melothe) at 3. See also *Explanation and Justification for the Regulations on Internet Communications*, 71 Fed. Reg. 18589, 18608-09 (Apr. 12, 2006) (citing H.R. Rep. No. 93-1239, 93d Congress, 2d Session at 4 (1974)) ("*Internet Communications Rulemaking*").

²⁰ Complaint at Factual Background & 1(b).

²¹ Advisory Opinion 2016-01 (Ethiq), at 3 (citing H.R. Rep. No. 93-1239, 93d Cong., 2d Sess. at 4 (1974)).

²² *Internet Communications Rulemaking*, at 18609.

Federal Election Commission
July 8, 2024
Page 6

to media entities, such as CNN, NBC, and other traditional media.” While this rulemaking addressed online activity, the Commission clearly acknowledges that the press exemption applies not only to traditional media, but also to others who are covering and reporting news stories in the same way that traditional media entities have reported.

The fact that the publication is not being produced by an incorporated legal entity does not impact the analysis, and the Complaint’s allegation that this is a “one off” publication is unfounded. Following its first edition, Mr. Ricchiazzi launched *The South Bay Chronicle* webpage, which publishes news content similar to Mr. Ricchiazzi’s other news sites, and he is in the process of finalizing the next newsprint issue of *The South Bay Chronicle* for distribution.²³ Mr. Ricchiazzi has demonstrated a pattern of publishing similar publications, including “Election Editions,” both in newsprint and online on a regular basis.²⁴ If the Commission were to deny the press exemption to new newspapers covering election news stories, it would be limiting the First Amendment freedoms in the press, which is specifically what the exemption aims to protect. Based on his current and ongoing news publications, Mr. Ricchiazzi has demonstrated that he is in the business of producing and disseminating news stories, commentary, and/or editorials, and is a press entity.

B. Mr. Ricchiazzi is not Controlled by a Candidate and *The South Bay Chronicle* Falls Within his “Legitimate Press Function.”

The second step of the *Reader’s Digest* framework has two sub-parts. It first asks whether the press entity is owned or controlled by a political party or candidate and then whether that entity is acting in its “legitimate press function.”

Ownership: Mr. Ricchiazzi is not a political party, political committee, or candidate. Nor is he an agent of the Campaign or otherwise controlled by the campaign. As explained in more detail below in Section II, Mr. Ricchiazzi works for Ms. Nijmeh at the Tribe and the GEF. He has never been employed by the campaign.²⁵ He was never an agent of the campaign. As such, the only question left is whether Mr. Ricchiazzi was acting in his “legitimate press function” when he published and disseminated *The South Bay Chronicle*.

²³ See Exhibit B.

²⁴ See Exhibit C (highlighting newsprint publications of *The Buffalo Chronicle* and *The City Politic*, which include commentary on candidates).

²⁵ Exhibit A, Ricchiazzi Decl. ¶ 2.

Federal Election Commission
July 8, 2024
Page 7

Legitimate Press Function: To make this determination, the Commission generally looks to whether the news material at issue is available to the general public, and whether it is comparable in form to those ordinarily issued by the entity.²⁶

The South Bay Chronicle is available to the general public.²⁷ As explained above, Mr. Ricchiazzi has demonstrated a pattern of publishing similar publications, including “Election Editions,” both in newsprint and online on a regular and continued basis.²⁸ Mr. Ricchiazzi currently operates *The Buffalo Chronicle* and digital publications at BuffaloChronicle.com and SFinquirer.com. His distribution of news content and political commentary is at the core of his publication operations, and his business model involves the regular and continued production and distribution of news and political commentary. Mr. Ricchiazzi is reporting on newsworthy events relevant to the South Bay of San Francisco in newsprint via *The South Bay Chronicle*, similar to how he has featured news reporting in Buffalo via *The Buffalo Chronicle*. The format of the publication was not any different from the formats, distribution, and content of Mr. Ricchiazzi’s other publications that he ordinarily issues. As such, he was engaging in a legitimate press function when he published and publicly disseminated *The South Bay Chronicle*.

C. It would be Unconstitutional to Apply the Media Exemption in the Manner Urged by Complainant.

The legislative history of the media exemption indicates that Congress did not intend to “limit or burden in any way the First Amendment freedoms of the press and of association.”²⁹

The Complaint offers shallow claims that *The South Bay Chronicle* is not subject to the media exemption because it is “campaign literature.” Complainant’s unhappiness with Mr. Ricchiazzi’s reporting or editorial decision making, however, has no bearing on the applicability of the media exemption. The Commission has long recognized that an entity otherwise eligible for the exemption “would not lose its eligibility merely because of a lack of objectivity in a news story, commentary, or editorial, even if the news story, commentary, or

²⁶ Advisory Opinion 2016-01 (Ethiq) (citing *FEC v. Mass. Citizens for Life*, 479 U.S. 238, 251 (1986)).

²⁷ See www.southbaychronicle.com.

²⁸ See Exhibit C (highlighting newsprint publications of *The Buffalo Chronicle* and *The City Politic*, which include commentary on candidates).

²⁹ *Internet Communications Rulemaking*, at 18608-09.

Federal Election Commission

July 8, 2024

Page 8

editorial expressly advocates the election or defeat of a clearly identified candidate for Federal office.”³⁰

The fact that the Complainant disagrees with the statements in *The South Bay Chronicle* does not mean that the newspaper constitutes “fake news.” Frivolous accusations, such as the one set forth by the Complainant, are an attempt to silence those with whom the Complainant does not agree. The same article may be presented differently by news networks that have different political leanings or ideologies. For example, the fact that news networks might take different positions reporting on the same facts does not mean that the network that does not align with the political ideology of the viewer is promulgating “fake news.” The flippant use of the term “fake news” is an attempt to discredit news sources and instill fear in the public regarding the legitimacy of reporting sources.

“It is not the role of the Federal Election Commission to determine whether a news story issued by a press entity is legitimate, responsible, or verified. . . . Whether particular broadcasts were fair, balanced, or accurate is irrelevant given the applicability of the press exemption.”³¹ If individuals, such as Complainant, could take print newspapers off the shelves because of “fake news,” allegations would be never ending. The right to speak and the right to publish under the First Amendment has been interpreted widely to protect individuals and society from government attempts to suppress ideas and information, and to forbid government censorship of books, magazines, and newspapers.

The Complaint is an attempt to squash speech that is unflattering. These types of efforts seek to stifle speech of political discourse with which one does not agree. Free speech is the essence of American-style democracy. The reporting at issue is substantive and deeply nuanced, and the Commission should be encouraging speech by news, rather than limiting or burdening the freedoms of the press.

Ultimately, because Mr. Ricchiazzi (1) is a “press entity” that is not owned or controlled by any candidate, political party, or political committee, and (2) *The South Bay Chronicle* constitutes a legitimate press function, the costs of reporting on and publishing

³⁰ Advisory Opinion 2005-16 at 6; Factual & Legal Analysis at 3, MUR 6579 (ABC News, Inc.) (July 5, 2012); see also Advisory Opinion 2010-08 (“While Citizens United’s films may be designed to further its principal purpose as a non-profit advocacy organization, an entity otherwise eligible for the press exemption does not lose its eligibility merely because of a lack of objectivity in a news story, commentary, or editorial.”).

³¹ *Internet Communications Rulemaking*, at 18609.

Federal Election Commission
July 8, 2024
Page 9

The South Bay Chronicle do not constitute an “expenditure” or “contribution” under the Act and Commission Regulations. Accordingly, there is no basis for finding that Mr. Ricchiazzi made a coordinated or independent expenditure related to *The South Bay Chronicle*.

II. Mr. Ricchiazzi did not Coordinate *The South Bay Chronicle* or The Stone Mailer with Ms. Nijmeh, the Committee, or any agent of the Committee.

The Complaint alleges that Mr. Ricchiazzi made two different in-kind contributions to the Committee in the form of coordinated communications for *The South Bay Chronicle* and The Stone Mailer. As discussed above, *The South Bay Chronicle* is exempt from regulation under the media exemption. However, in the unlikely event that the Commission does not find the media exemption applies, there was no coordination.

To find reason to believe that the Committee has made a “coordinated communication” under 11 C.F.R. § 109.21, and therefore an in-kind contribution to the Committee, a complaint must allege *sufficient specific facts* that meet all three prongs of the regulation: the payment prong, the content prong, and the conduct prong.³² As for the conduct prong, the complaint must show that the candidate or campaign conveyed information regarding its “plans, projects, activities, or needs” to the Committee, and that this information was both nonpublic and material to the “creation, production, or distribution” of a particular communication disseminated by the Committee.³³ A complaint is insufficient if it “presents nothing more than idle, unsupported speculation.”³⁴ And where a complaint is based solely on speculation, respondents do not bear the burden of proving their innocence.³⁵

³² 11 C.F.R. § 109.21(a). The payment and content prongs are not in dispute.

³³ *Id.* § 109.21(d).

³⁴ See MUR 5467 (Michael Moore), First General Counsel’s Report at 6 (July 22, 2004); see also MUR 7868 (Twitter), Supplemental Statement of Reasons, Vice Chair Dickerson & Comm’r Trainor at 4 (Sept. 13, 2021); see also MURs 6789/6852 (Special Operations for America, *et al.*), Statement of Reasons, Vice Chairman Petersen & Comm’r Hunter at 4 (May 28, 2019) (“We do not authorize Commission investigations based on mere speculation.”).

³⁵ MUR 7501 (Bill Nelson for U.S. Senate, *et al.*), Statement of Reasons of Vice Chair Allen Dickerson and Comm’rs Sean J. Cooksey and James E. “Trey” Trainor III at 2 (June 28, 2021), citing MUR 6747 (Rick Santorum for President), Statement of Reasons of Vice Chair Caroline C. Hunter and Comm’rs Lee E. Goodman and Matthew S. Petersen at 2 (Feb. 15, 2017) (“[M]ere ‘official curiosity’ will not suffice as the basis for FEC investigations. Therefore, “[t]he Commission cannot launch investigations into Americans’ political activities based on speculation or official curiosity, or shift the burden to respondents to prove their innocence.”).

Federal Election Commission

July 8, 2024

Page 10

The “conduct prong” of the test is only met if at least one of six enumerated standards are met.³⁶ Here, the Complaint alleges that Mr. Ricchiazzi was an “agent” or “former employee or independent contractor” of the Committee based on the fact that Mr. Ricchiazzi briefly volunteered for the Committee and “self identified” as Ms. Nijmeh’s chief of staff. The Complaint also alleges that *The South Bay Chronicle* must have been coordinated because of the vast amount of content in the publication, yet cites no specific facts to support this allegation.³⁷ The Complaint is a tangled mess of conjecture and speculation about the relationship between Mr. Ricchiazzi and the Committee and what was done. None of the purported “facts” are at all clear enough to establish a potential violation of the Act and the Commission should dismiss the Complaint promptly.

A. Mr. Ricchiazzi was not a Former Employee.

The Complaint falsely concludes that because Mr. Ricchiazzi volunteered for the Committee and served as “chief of staff,” the “former employee or independent contractor” conduct prong has been met.³⁸ Mr. Ricchiazzi has never been an employee of the Committee nor did he have any authority to create, produce, or disseminate public communications.³⁹ He was an unpaid volunteer whose efforts were limited to canvassing, door hanging, and other similar grassroots efforts to spread awareness regarding Ms. Nijmeh’s candidacy. In this short-term limited volunteer role, Mr. Ricchiazzi was not in any position to receive information about the plans, projects, activities, or needs of the Committee nor did he receive such information.⁴⁰

Further, Mr. Ricchiazzi did not serve as “Chief of Staff” to the Committee, and his activities as Chief of Staff to the GEF and the Tribe were wholly separate and unrelated from his limited unpaid Committee volunteer efforts and cannot be attributed to employment by the Committee.

While Commission Regulations do not specifically define the term “employee” in Section 109.21, the Commission has explained, when adopting the former employee

³⁶ 11 C.F.R. § 109.21(a)(3).

³⁷ See Complaint at I.

³⁸ *Id.*

³⁹ Exhibit A, Ricchiazzi Decl. ¶ 11.

⁴⁰ *Id.* ¶¶ 4, 11-13.

Federal Election Commission

July 8, 2024

Page 11

regulation, that the term “former employee” does not apply to individuals who are “volunteers” (i.e., unpaid individuals working for the campaign).⁴¹ The Commission even noted that even though some volunteers may operate as highly placed consultants privy to information about the plans, projects, activities, or needs of the candidate, the Commission was excluding volunteers from the former employee conduct standard because Congress’s use of the term “employee” indicated its intent to limit the term to those individuals employed by the campaign for pay. Because Mr. Ricchiazzi was not employed by the Committee, he cannot be considered a former employee.

B. Mr. Ricchiazzi was not an Agent of the Committee.

The Complaint alleges that Mr. Ricchiazzi “self-identifies as Nijmeh’s chief of staff,” and therefore serves as an “agent of Nijmeh.”⁴² There is no dispute that Mr. Ricchiazzi serves as Chief of Staff for the Tribe and the GEF, but nothing in the Complaint suggests he was Chief of Staff and acted as an agent for the Committee. Indeed, the article on which the Complaint relies makes this clear.⁴³ The Complaint selectively quotes the article to paint Mr. Ricchiazzi as a campaign chief of staff. Further, Mr. Ricchiazzi’s declaration expressly attests otherwise.⁴⁴ Mr. Ricchiazzi did not have any express or implied authority to engage in the enumerated communication-related activities that would qualify him to be an agent acting on the Committee’s behalf for the purposes of the coordinated communications regulations.⁴⁵

As a volunteer, Mr. Ricchiazzi had no authority to engage in any of the enumerated activities required by 11 C.F.R. 109.3(b) to qualify as an “agent” on the Committee’s behalf. The Committee had paid staff that served as Committee advisors. Further, the fact that Mr. Ricchiazzi serves a “Chief of Staff” for the GEF and the Tribe did not and does not give him

⁴¹ Coordinated and Independent Expenditures, Final Rules & Explanation & Justification, 68 Fed. Reg. 439 (Jan. 3, 2003).

⁴² Complaint at 1(a).

⁴³ *Silicon Valley Congressional Candidate Tied to Fake Newspaper*, SAN JOSE SPOTLIGHT (Feb. 12, 2024), <https://sanjosespotlight.com/silicon-valley-congressional-candidate-charlene-nijmeh-tied-to-fake-newspaper-misinformation-zoe-lofgren-election-2024/#:~:text=News%20articles%20in%20a%20publication.Screenshot>.

⁴⁴ Exhibit A, Ricchiazzi Decl. ¶ 2.

⁴⁵ 11 C.F.R. § 109.3(b). A person only qualifies as an agent if he or she “(1)[r]eceives actual authorization, either express or implied, from a specific principal to engage in the specific activities listed in 109.3; (2) engages in those activities on behalf of the specific principal; and (3) those activities would result in a coordinated communication if carried out directly by the candidate, authorized committee staff, or a political party official.

Federal Election Commission

July 8, 2024

Page 12

the authority to act on behalf of the Committee. In fact, Mr. Ricchiazzi would be prohibited from doing so under his role as “Chief of Staff” of the GEF, which is prohibited from supporting candidates as a 501(c)(3) tax-exempt organization. Mr. Ricchiazzi was never paid by the Committee and did not have any authority, express or implied, to act on behalf of the campaign to approve or authorize expenditures by Committee, or to create, produce, disseminate or distribute any public communication on behalf of the Committee. Accordingly, he cannot be considered an agent of the Committee.

Mr. Ricchiazzi did not make an in-kind contribution to the Committee in the form of coordinated communications because he was not a former employee or agent of the Committee.

C. Ms. Nijmeh did not Assent to the Communications.

The Complaint alleges that Ms. Nijmeh assented to *The South Bay Chronicle* because she permitted Mr. Ricchiazzi to follow and report on the campaign but provides no facts to substantiate any knowledge that Ms. Nijmeh was aware of any specific communication. Moreover, both Ms. Nijmeh and Mr. Ricchiazzi have attested that no such discussions or assent occurred.⁴⁶

The Complaint states no facts to support its false allegations that the public communications by Mr. Ricchiazzi were coordinated with the Committee because of his volunteer activities on the campaign or role as “Chief of Staff” of the GEF and Tribe. Mr. Ricchiazzi was never an employee or agent of the Committee and has attested to the fact that all public communications were independently developed, created, and produced by himself, without any involvement by or discussion with the Committee.⁴⁷ Mr. Ricchiazzi has further attested under oath that he was not privy to any proprietary, non-public information regarding the needs, activities, plans, or projects of the Committee while he briefly served as a volunteer.⁴⁸

⁴⁶ Exhibit A, Ricchiazzi Decl. ¶¶ 11-15.

⁴⁷ *Id.* ¶ 12.

⁴⁸ *Id.* ¶ 4.

Federal Election Commission

July 8, 2024

Page 13

The Complaint fails to provide any evidence of actual “coordinating” conduct that is described in 11 C.F.R. § 109.21(d). Without any evidence of qualifying conduct, the Commission cannot find reason to believe a violation occurred.

III. The Stone Mailer – Disclaimer and Independent Expenditure Allegations.

Finally, we address the minor disclaimer and reporting issues raised in the Complaint about The Stone Mailer.⁴⁹

A. Disclaimer Allegations.

The Complaint alleges that Mr. Ricchiazzi distributed The Stone Mailer as a coordinated communication in advance of the March 1, 2024 primary election without a complete disclaimer as required to be included on printed materials pursuant to 11 C.F.R. § 110.11. The Complaint acknowledges that it is possible that the mailer was conducted independently of the Committee, in which case the mailer would have instead triggered independent expenditure reporting.

As explained above, Mr. Ricchiazzi did not coordinate with Ms. Nijmeh or the Committee regarding The Stone Mailer.⁵⁰ As such, The Stone Mailer was not a coordinated communication. Mr. Ricchiazzi, however, does not dispute that The Stone Mailer constitutes an independent expenditure. He made an expenditure that expressly advocated the election or defeat of a clearly identified candidate that was not made in concert or cooperation with or at the request or suggestion of such candidate, the candidate’s authorized political committee, or its agents.⁵¹

Mr. Ricchiazzi was unaware of the Act and Commission Regulations regarding independent expenditures. He believed that The Stone Mailer included the required disclaimer (“Paid for by Matt Ricchiazzi”), which the Complaint admits was disclosed on the face of the mailer and is visible in the images included in Exhibit E.⁵² The Complaint targets Mr. Ricchiazzi for failing to include the additional disclaimer text required under 11 C.F.R.

⁴⁹ Complaint at II.

⁵⁰ See also Exhibit A, Ricchiazzi Decl. ¶¶ 11-15.

⁵¹ 52 U.S.C. § 30101(17).

⁵² See also Exhibit A, Ricchiazzi Decl. ¶ 16.

Federal Election Commission

July 8, 2024

Page 14

§§ 109.11 and 110.11(b)(3) indicating they were “not authorized by any candidate or candidate’s committee.”

Mr. Ricchiazzi was not aware that the mailer should have included this language and now understands that such language is required to be included within the printed box on printed communications that constitute independent expenditures. His failure to include the required disclaimer was inadvertent, and Mr. Ricchiazzi apologizes for his lack of understanding of the Regulations.

The Complaint does not claim that there was any uncertainty regarding who paid for The Stone Mailer, nor does the Complaint allege facts suggesting that the omission of the additional “not authorized by any candidate or candidate’s committee” language was intentional or impacted the electoral process in any way. Of note, Mr. Ricchiazzi’s name and address was included clearly in the return address on the envelope. The Commission has consistently determined that a complaint such as this alleging omission of a required disclaimer is a low priority for Commission action.

B. Alleged Independent Expenditure Reporting Violations.

The Complaint alleges that Mr. Ricchiazzi failed to file required a required 24-Hour Report and subsequent April Quarterly Report with the Commission as required by 11 C.F.R. § 109.10 in connection with his printing and distribution of The Stone Mailer.

Mr. Ricchiazzi disseminated approximately 20,000 copies of The Stone Mailer on or around February 21, 2024, which supported Charlene Nijmeh and opposed Zoe Lofgren and Peter Hernandez, each of whom were candidates in the 18th Congressional District of California. Mr. Ricchiazzi expended \$12,047.75 for The Stone Mailer on February 21, 2024.⁵³

Mr. Ricchiazzi acknowledges that he did not timely disclose the \$12,047.75 expenditure in a 24-Hour Report of Independent Expenditures, and subsequently did not file a quarterly report in April 2024 to re-disclose that cost. His failure to file the requisite reports was unintentional. Mr. Ricchiazzi did not seek to hide the source of the payor. Mr. Ricchiazzi conspicuously disclosed that he paid for the mailer himself, with his name and return address labeled clearly on the face of the envelope. However, Mr. Ricchiazzi did not understand that

⁵³ See Exhibit D (reflecting total amount invoiced and paid).

Federal Election Commission
July 8, 2024
Page 15

this communication was reportable as an independent expenditure with the Commission, and the failure to report was inadvertent.

For the foregoing reasons, given the small amount of spending at issue and the accidental nature of the violation, the Commission should exercise its discretion to dismiss the allegations regarding the failure to file a 24-Hour Report and subsequent quarterly report.

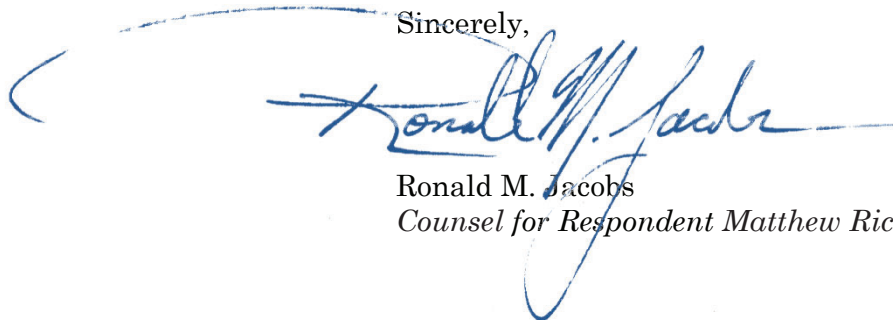
CONCLUSION

The Commission should find no reason to believe that Mr. Ricchiazzi has violated the Act or Commission Regulations. As demonstrated above, *The South Bay Chronicle* is subject to the media exemption and is not subject to Commission regulation. Further, the Complaint presents unsubstantiated allegations of impermissible coordination between Mr. Ricchiazzi, Charlene Nijmeh, and Charlene for Congress 2024 related to both *The South Bay Chronicle* and *The Stone Mailer*.

While there were minor disclaimer mistakes, Mr. Ricchiazzi is a novice in the world of political mailings. He included the key elements of the disclaimer saying that he paid for the communication and now knows about the need to include the additional sentence. In addition, he has learned his lesson about being civically involved with his own money and has learned of the need to file independent expenditure reports. Given the small nature of these first-time violations, the Commission should exercise its prosecutorial discretion to dismiss those aspects of the Complaint.

Thank you for your consideration of this matter. Please do not hesitate to contact me with any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ronald M. Jacobs", is written over a large, light blue circular scribble. The signature is fluid and cursive.

Ronald M. Jacobs
Counsel for Respondent Matthew Ricchiazzi

EXHIBIT A

**Before the
Federal Election Commission**

**In the Matter of Charlene Nijmeh, Charlene |
For Congress 2024, Stacey Owens in her |
official capacity as Treasurer of Charlene |
for Congress 2024, and Matthew Ricchiazzi |**

MUR 8254

Declaration of Matthew Ricchiazzi

I, Matthew Ricchiazzi, a competent adult of sound mind, hereby declare under penalty of perjury under the laws of the United States of America:

1. I am the “Chief of Staff” for Green Education Foundation, a 501(c)(3) tax-exempt nonprofit organization, and for the Muwekma Ohlone Tribe.
2. I was never a paid member of the Charlene for Congress 2024 (“Committee”) campaign staff at any time. I did not serve as Chief of Staff or in any other paid staff capacity for the Committee.
3. I served as an unpaid volunteer to the Committee in California and assisted with canvassing, door hangers, sign-up sheets, and other organizing efforts prior to the California primary in March 2024. I did not receive any compensation or other payment from the Committee for serving as a volunteer.
4. I was never privy to any non-public proprietary information about the needs, activities, plans or projects of the Committee.
5. I paid for and authored *The South Bay Chronicle* at issue in the Complaint.
6. I am a publisher and citizen-journalist who has been producing newsprints focused on political and policy discourse on issues critical to our communities’ quality of life and American advancement, under various mastheads, including *The City Politic* (2010-12), *The Buffalo Chronicle* (since 2014), and *The South Bay Chronicle* (2024).
7. I currently maintain digital publications including *BuffaloChronicle.com* and *SFinquirer.com*, which produce news journalism, entertainment content, political commentary, satire, and other content. At times, I had operated now-defunct domains including *BostonSunday.com*, *WashingtonInquizitor.com*, *SenecaPost.com*, and *TheCityPolitic.com*.
8. In recent weeks I’ve launched the digital edition of *The South Bay Chronicle* at *southbaychronicle.com*, which is intended to cover politics and community issues in the Greater San Jose area.
9. I do not have separate legal entities through which I produce and disseminate my publications. I publish these myself. I am not employed by any publication, and I

do not work on publications other than my own. I do not work on any publications on Foundation or Tribe time.

10. I did work as a paid journalist for *The Niagara Falls Reporter*, *Artvoice*, *The South Buffalo News*, and *The Lackawanna Front Page* from 2015-2016. I was an unpaid regular contributor to *Buffalo Rising* from 2010 to 2014.
11. During my volunteer activities during the weeks preceding the California primary, I was not authorized to and did not create, develop, produce, disseminate or distribute *The South Bay Chronicle* or the Roger Stone mailer for or on behalf of the Committee.
12. *The South Bay Chronicle* and the Roger Stone mailer produced, developed and disseminated by myself were based on independent information and knowledge, and were never based upon any non-public proprietary information from the Committee regarding the needs, activities, plans or projects of the Committee.
13. *The South Bay Chronicle* and the Roger Stone mailer were not created, developed or produced with any involvement or discussion whatsoever by Charlene Nijmeh, the Committee, or any agent or vendor of the Committee.
14. Charlene Nijmeh, the Committee, its agents, employees, or representatives had no material involvement or substantial discussions regarding *The South Bay Chronicle* or the Roger Stone mailer.
15. *The South Bay Chronicle* and the Roger Stone mailer were not made at the behest, suggestion, or request of the Committee, Charlene Nijmeh, or any agent of the Committee. I did not have any conversations with Charlene Nijmeh regarding *The South Bay Chronicle* or the Roger Stone mailer and Charlene Nijmeh did not assent to the publication of these communications.
16. I produced a mailer highlighting Roger Stone's criticism of the incumbent, with a clear and unambiguous disclosure: "Paid for by Matt Ricchiazzi," which I understood to be the correct disclaimer. No effort was made to hide the origin of the mailer.

Dated: July 8, 2024

Matthew Ricchiazzi

Matthew Ricchiazzi

EXHIBIT B

The South Bay Chronicle

Insider Information. Outsider perspective.

LATEST NEWS



Uncategorized

Pelosi meets with 14th Dalai Lama in India, reaffirms congressional support for Tibet

Editor-in-Chief



Uncategorized

Assemblyman Evan Low introduces bill to protect election integrity and ensure funding transparency in election recounts

Editor-in-Chief



Uncategorized

Rep. Swalwell introduces bill to make housing more affordable for teachers

Editor-in-Chief



House of Representatives

Rep. Khanna introduces bill in honor of the late Rev. James Lawson

Editor-in-Chief

POLITICS AND GOVERNMENT AFFAIRS

EXHIBIT C

The Buffalo Chronicle

THE 101st EDITION
June 25, 2019

Piccirillo can't shake City Hall bias scandals in bid for Niagara Falls Mayor



were to preference a restoration of the structure, citing its historical standing. That excited Merle Se... local preservationist who restored a dozen turn-of-the-century residential structures and breakfast... City's historic neighborhood... Niagara Falls, N.Y. Mayor Paul Dwyer's administration even issued a Request for Proposals in September of 2017 that



Katrinna Martin backs a new Bills Stadium downtown

County Legislature candidate Katrinna Martin is calling on Buffalo Bills stadium in downtown Buffalo District -- and she has a plan to do so that won't burden property taxpayers. "We have the very worst Stadium in the NFL -- but we have the very best fans -- and we all deserve a high-caliber

venue that we can be proud of -- and that will help the team recruit players who really crave to play here," Martin explains. "A better stadium will help us recruit an even better team." Martin is preparing a bipartisan lobbying effort of Governor Andrew Cuomo to ensure that Western New York gets its fair share from New York State. Downstate stadiums have Continued pg. 5

Haudenosaunee retake Six Nations Council House, may dismiss federal officials

Observers of indigenous politics are calling it the next 'Standing Rock' -- and protesters are expected to grow all over long -- during a primary election year, to acknowledge it's limited role... (SNEC) from their chambers and senior administrators from their offices. The shutdown is being enforced until SNEC

The Melhus Building at 550 Main Street in downtown Niagara Falls was of classic American commercial architecture typified in the early 1900s, at the peak of Niagara's industrial prowess, boasting a dense mix of uses on a narrow lot, with a storefront abutting Main and office and apartment spaces located above. Most in the development of Niagara Falls, asserted that the building was of considerable preservation value, located within eyeshot of the Falls itself and only a short two-block walk

As far as preservation opportunities go, the Melhus Building was ripe for a glorious restoration and a prime case for Mayor Paul Dwyer's administration even issued a Request for Proposals in September of 2017 that

The Buffalo Chronicle

Stop bashing teachers, says Senator
Al Cappola, on brink of primary win



Pancipino's campaign asks Paul Caputo's raises eyebrows NYSAFE Act



Grissa's best of West Side 1 infirmary base

Peoples-Stokes blamed for no Eastside money



Thompson outlines bold plan on property tax reforms



Recently back into common services & protection where cities in South, West, Westchester, and Albany.
Thompson outlines the bold plan to reform the property tax system. He says the plan will benefit new jobs and all other taxpayers.
Mr. Thompson is the former mayor of Albany and is now a member of the Albany City Council. He is also a member of the Albany County Board of Supervisors. He is currently running for the Albany City Council in the November election.

Not quite four years ago, a newly elected Governor, the then Mayor of Albany, and the then Mayor of Buffalo...
The Albany City Council is currently reviewing the plan. It is expected to be implemented in the next few months.



...of the Albany City Council...
...of the Albany City Council...
...of the Albany City Council...

CONTENDERS, EPIC WILLOWMORE DISTRICT



GOV. HOCHUL?



DARIUS A HEATED V



The City Politic

Buffalo Niagara's most insightful politics, news, and analysis with a humanizing twist



BUFFALO

August 23, 2010

The City Politic: where truth conquers fiction

AUG 23, 2010

Read Online at TheCityPolitic.com

THE EMPIRE STATE'S POLITICS

Hoyt: Golombek is in the pocket of the Teachers' Unions

BY BRAD FULLER

Assemblyman Sam Hoyt faces a tough primary challenge in the 144th Assembly district from longtime City Councilman Joe Golombek. Each candidate's strategy is taking shape, and the primary remains less than a month away. It's going to be a tough fight for both contenders, and the polls have the race in a dead heat.

Councilman Golombek will say that Hoyt's list of successes is too short to justify another term. Hoyt will ask, "what has Golombek done with his nine years on the Common Council?"

(continued on page 2)

Poll: DiPietro takes the lead in the 59th senate district

BY BRAD FULLER

Former East Aurora Mayor and Tea Party candidate Dave DiPietro has taken a clear lead in the 59th district's Republican primary. Over the course of two days (August 8 to August 9), The City Politic contacted 250 likely voters in the 59th district. Of the 85 respondents, 46% said they intended to vote for DiPietro, 28% said they intended to vote for former party chairman James Donagabadi, 20% said they intended to vote for former Erie County Sheriff Patrick Gallivan, and 7% said they were undecided.

(continued on page 2)

Kennedy attempts to push out Casey

BY MATTHEW RICCHIAZZI

(Aug. 18, 2010) - Timothy Kennedy's campaign for State Senate is trying to push Tom Casey out of the 58th District's Democrat Party primary. Now, even a day after the Board of Elections made a preliminary ruling that Casey does have enough advance signatures to be placed on the primary ballot, Kennedy's campaign and Timothy Whalen is objecting and file an order to show cause. It is unlikely that Casey will be kicked off the ballot, without use of "extra-legal" tactics.

Casey's inclusion in the Democrat primary has considerable implications for that race. The most obvious implication is that Kennedy will have a much more difficult time.

(continued on page 2)



Incurrent State Sen. Bill Stachowski

Stachowski, an old dog still plays tricks

BY MATTHEW RICCHIAZZI

Sen. Bill Stachowski still knows how to play political tricks, and this summer those tricks have been on full display. Stachowski orchestrated what some politicians are calling "the theft of the Independence Party line" from County Legislator and Senate candidate Tim Kennedy, using his challenger's reluctance to acknowledge stolen his signature.

Over the course of circulating nominating petitions this summer, Chairman Frank Max of the Checkersburg Democrats decided to run Chris Ahrens for State Senate on the Independence Party line. Ahrens is a 23 year old employee of the Town of Checkersburg Department of Law Enforcement.

(continued on page 2)

Quinn's biggest liability

BY KEVIN THOMAS

Assemblyman Jack Quinn, III is the favorite to win the 38th District Senate seat, which political observers expect to be vacated by incumbent Sen. Bill Stachowski. But Quinn's cozy relationship with the State's various teachers' unions might become a fatal liability in the general election.

Quinn has refused to oppose the State's Taylor Law, which grants an extraordinarily lucrative level of rights and job securities for public employees' unions. The law prevents government administrators from terminating incompetent or underperforming state employees.

(continued on page 3)



State Senate candidate Jack Quinn, III

Why is Paladino against gay marriage?

BY KEVIN THOMAS

For a guy whose staff is not unlike a West Village Pride Parade, it is puzzling why gubernatorial candidate Carl Paladino decided to take such a staunchly anti-marriage equality policy position early in his campaign. The obvious initial strategic motivation was to position Paladino as the conservative's conservative... solidly attacking his moderate opponent from the right. That strategy seems to be paying off, and Paladino is making great strides and will be the likely winner of the primary.

Since Paladino announced his candidacy, the national discussion has found a new

(continued on page 3)



State Senate candidate Tom Casey

Weekly Roundup

Mayor Byron Brown has faced questions about his managerial competence in the wake of revelations that Human Resources Committee Chairman Karle Thomas made over \$2 million in investment program arrangements for himself and his family.

Thomas is the former chairperson of GreenTrust. He was fired despite lacking requisite qualifications for the position specifically requires.

The allegation of incompetence comes only two weeks after Mayor Brown appointed Daniel Derenda as Police Commissioner, another political appointment of an individual that lacks basic education and experiential prerequisites.

North District Councilman Joe Golombek is being accused of being a member of the Tea Party, because of an appearance he made at Rep. Thompson's "TEA" event. Golombek has long called himself a "conservative Democrat." It's unclear how that message is going to play in the liberal 144th Assembly district.

SEN. ANTHONY THOMPSON thinks he can win reelection on these issues: crime, schools, and the environment. But the anti-progress Teachers' unions back him. He has said that he was friends with those involved in the gang related shooting outside of The City Hall. He chairs the environment committee. Hoyt Lake at Delaware Park (at the heart of his district) remains an unbearably polluted lake. What's that rebound again?

Political tidbit...

Individual rights are not subject to a public vote; a majority has no right to vote away the rights of a minority; the political function of rights is precisely to protect minorities from oppression by majorities (and the smallest minority on earth is the individual).

- Ayn Rand

...it really makes you think about Paladino's position on the Marriage

Zeitgeist: Bass Pro Debauch Averted (is Buffalo getting its swagger back?)... Skidding towards fall, by James Howard Kunstler... MUCH MORE

Conspiracy Theories: Carl Paladino's Taxpayer's Party has just made him the most powerful man in Buffalo... Stach and Schim have been behaving badly... MORE

Interested in advertising with The City Politic? Contact us at advertising@thecitypolitic.com
For letters to the editor and opinion submissions you can contact editor@thecitypolitic.com

ISSUE THREE -- VOL 1

EXHIBIT D

Invoice



Date	Invoice No.
02/20/24	41139

Diamond Quality Printing Inc.
1465 Monterey Rd
San Jose Ca 95110

Bill To:

Matthew Ricchiazzi

Item	Description	Quantity	P.O. Number	Terms
			M.Ricchiazzi	Due on receipt
			Rate	Amount
Article	8.5 x 11 full color two sided on 100# gloss text + fold in half total qty=23,715 Roger Stone Print/Mail price includes all setup & delivery	1	2,632.00	2,632.00T
Mailing Services	NCOA, sort, tab, address, tray & del to PO (5 versions) qty=23,715 Mailing Services	1	2,150.00	2,150.00
postage	Postage	1	7,019.00	7,019.00
	Billing date 2/20/24 Sales Tax		9.375%	246.75
			Total	\$12,047.75

Business Adv Fundamentals : Account Activity Transaction Details

Post date: 02/21/2024**Amount:** -11,015.00**Type:** Debit**Description:** BKOFAMERICA BC 02/21 [REDACTED]
WITHDRWL 99 S 4th St San Jose CA**Merchant name:** BKOFAMERICA BC WITHDRWL 99 S 4th St CA
**Merchant
information:****Transaction
category:** Cash, Checks & Misc: ATM/Cash Withdrawals

EXHIBIT E

PATRIOTS!

DON'T VOTE FOR PETER HERNANDEZ!



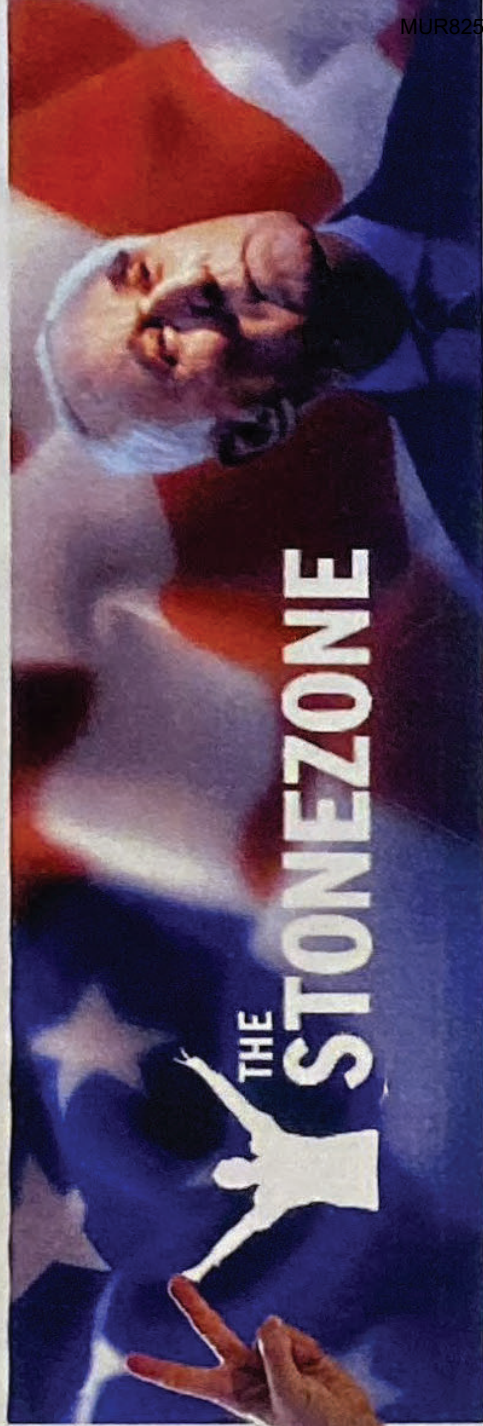
It's statistically impossible for a Republican to win the 18th congressional district. But a moderate Democrat will send Zoe Lofgren packing!

Scan to read Roger Stone's message to Republican voters in the 18th district:



“Zoe Lofgren is an absolutely vile human being.”

ENCLOSED IS A TOP SECRET MESSAGE FROM THE DESK OF ROGER STONE



MUR825400129

Matt Ricchiazzi



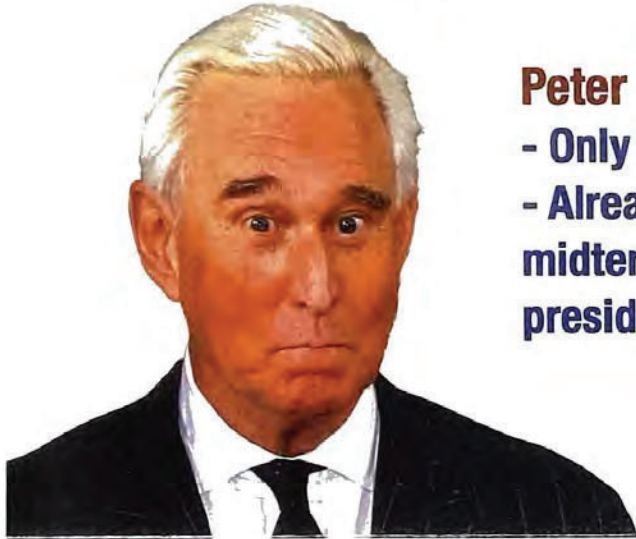
San Jose, CA 95113

PRSR T S
U.S. POST PAID
SAN JOSE PERMIT 1



THIS MESSAGE IS TOP SECRET - DO NOT SHARE WITH NON-REPUBLICANS

In a psycho-liberal state like California, Republican voters are forced to think strategically. If you want to oust a crooked incumbent, you often need a Democrat to get through the jungle primary in order to have a competitive choice in November.



Peter is a great guy, but he just can't win:

- Only 19% GOP enrollment in the 18th district
- Already lost 35% to 66% to Lofgren during the midterms, when GOP turnout is higher than presidential election years

It's just statistics.



This is why I'm calling on GOP voters to back Charlene Concepción Nijmeh on March 5th.

Zoe Lofgren is a repulsive human being:

- Suffers from Trump Derangement Syndrome
- Sham 'Impeachment Manager' against Trump twice
- January 6 hoax committee member that sent law abiding innocent people to prison
- Big Tech's 'Madam' on Capitol Hill
- Refuses to regulate Big Tech and supports the censorship industrial complex



Lord help us if Lofgren becomes Chair of the Science & Tech Committee. There will be no First Amendment rights left.



FEDERAL ELECTION COMMISSION
1050 First Street, NE
Washington, DC

STATEMENT OF DESIGNATION OF COUNSEL

Provide one form for each Respondent/Witness

EMAIL cela@fec.gov

AR/MUR/RR/P-MUR# 8254

Name of Counsel: Ronald Jacobs

Firm: Venable LLP

Address: 600 Massachusetts Ave NW

Washington, DC 20001

Office#: 202-344-8215 Fax#: 202-344-8300

Mobile#: [REDACTED]

E-mail: RMJacobs@Venable.com

The above-named individual and/or firm is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

6/3/2024

Date

Matthew Ricchiazzi

(Signature - Respondent/Agent/Treasurer)

Title

Matt Ricchiazzi

(Name - Please Print)

RESPONDENT: Matt Ricchiazzi
(Please print Committee Name/ Company Name/Individual Named in Notification Letter)

Mailing Address: [REDACTED]
(Please Print)

San Jose, CA 95113

Home#: _____ Mobile#: [REDACTED]

Office#: _____ Fax#: _____

E-mail: matt@muwekma.org

This form relates to a Federal Election Commission matter that is subject to the confidentiality provisions of 52 U.S.C. § 30109(a)(12)(A). This section prohibits making public any notification or investigation conducted by the Federal Election Commission without the express written consent of the person under investigation.