

Michael Howard Williams  
(Mike Williams for Congress)  
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**RECEIVED**  
FEDERAL ELECTION COMMISSION  
JUNE 13, 2024 4:54 PM  
OFFICE OF GENERAL COUNSEL

**MUR 8275**

FEC Complaint:

I, Mike Williams, was a candidate for Texas CD-31 in the 2024 Republican Primary. I became aware of a Candidate Fair being hosted by the Hamilton County Republicans scheduled for February 5 via Facebook on the morning of January 20. I had been locked out of Facebook for about a week at that point, and set-up a ghost Facebook page so I may monitor events scheduled for the six counties of my district. I routinely check the websites and Facebook pages of my six counties at least twice a week to stay informed.

I texted Mr. Lucas Robinson (Hamilton County Republican Chair) that morning (January 20) at 8: 54am to inquire as to details of the Fair. Mr. Robison replied that it was the last scheduled regular meeting in Hamilton County before election day, and that the speaker list was full and there would be no time allotted for me to speak. He also stated that four of my opponents for TX-31 are on the list of speakers. I offered to have the time of each speaker reduced to afford each candidate present equal time or cut speaking time for candidates in my race altogether, none of these solutions were acceptable to Mr. Robinson. This text thread went on until 2:44pm that afternoon without a satisfactory resolution.

I saw three of my opponents at a Candidate Forum being hosted by some Bell County Republican Precinct Chairs in Temple on the evening of Sunday January 21. I inquired as to how they became aware of the Candidate Fair in Hamilton on February 5; some replied via email and some via Facebook. Mr. Robinson has my email address and phone number; I was not afforded the same level of due diligence from Mr. Robinson as my opponents.

I submit that Mr. Robinson's handling of this matter constitutes an illegal campaign contribution to all of my opponents as the County party failed to report it. It is asserted that this action qualifies as an In-kind campaign contribution that is in violation of Federal campaign finance law:

1) a political party may only make a coordinated party expenditure in connection with a general election. 2) the contribution does not appear in John Carter's first quarter (2024) FEC filing. 3) the contribution exceeds the federal limit - a Party may only donate up to \$5,000 to a campaign.. Excluding candidates from a candidate forum makes the forum itself a communication in support of those included because the exclusion of certain candidates lends the sponsor's tacit support to those included as the candidates worthy of consideration by the audience. I assess the unreported value of the Candidate Fair as being \$6,000, based on my having hosted similar events in the 2022 primary election season. The Respondents are the Hamilton County Republican Party and the John Carter Campaign.

Subscribed and sworn to:

Date: June 13, 2024

Signature: 

Printed name: Michael Howard Williams

Notary Public



 6-13-2024