



FEDERAL ELECTION COMMISSION
Washington, DC 20463

VIA CERTIFIED MAIL
AND ELECTRONIC MAIL

joannaopela@me.com

August 12, 2020

RETURN RECEIPT REQUESTED

Joanna Opela, Treasurer
Trail Blazers for Michael Opela Committee
228045 Weinkauff Road
Edgar, WI 54426

RE: MUR7699
Church for Wisconsin
and Paul Kilgore, as treasurer
Jason Church

Dear Ms. Opela:

The Federal Election Commission has considered the allegations contained in your complaint dated February 16, 2020. On August 6, 2020, based upon the information provided in the complaint, and information provided by the respondents, the Commission decided to exercise its prosecutorial discretion to dismiss the allegations as to Church for Wisconsin and Paul Kilgore, in his official capacity as treasurer, and Jason Church, and closed its file in this matter. The General Counsel's Report, which more fully explains the basis for the Commission's decision, is enclosed.

Documents related to the case will be placed on the public record within 30 days. *See Disclosure of Certain Documents in Enforcement and Other Matters*, 81 Fed. Reg. 50,702 (Aug. 2, 2016), effective September 1, 2016.

The Federal Election Campaign Act allows a complainant to seek judicial review of the Commission's dismissal of this action. *See* 52 U.S.C. § 30109(a)(8). If you have any questions, please contact Don Campbell, the attorney assigned to this matter, at (202) 694-1650.

Sincerely,

Lisa J. Stevenson
Acting General Counsel

A handwritten signature in blue ink, appearing to read "Jeff S. Jordan".

BY: Jeff S. Jordan
Assistant General Counsel

Enclosure
General Counsel's Report

BEFORE THE FEDERAL ELECTION COMMISSION
ENFORCEMENT PRIORITY SYSTEM
DISMISSAL REPORT

MUR: MUR 7699

Respondent: Church for Wisconsin.
and Paul Kilgore, as treasurer
(the “Committee”)
Jason Church

Complaint Receipt Date: February 18, 2020

Response Date: March 11, 2020

**Alleged Statutory/
Regulatory Violations:** **52 U.S.C. §§ 30101(2), 30102(e), 30104(a), (b), 30120
11 C.F.R. §§ 100.3, 102.12, 104.1, 104.2, 104.3, 110.11**

The Complaint alleges that Church improperly filed his Statement of Candidacy, and alleges the Committee improperly filed its Statement of Organization and failed to file its 2019 Year-End financial disclosure report.¹ The Complaint further alleges that the Committee included inadequate disclaimers on TV and radio ads, yard signs, and social media posts.² The Response asserts that Church’s Statement of Candidacy and the Committee’s Statement of Organization complied with the requirements of the Federal Election Campaign Act of 1971, as amended (the “Act”), and Commission regulations, and states that the Commission waived the requirement to file a Year-End Report for authorized committees participating in Wisconsin’s 7th District Special Primary.³ Respondents also assert that the Committee displayed the proper disclaimers on its social media and public communications.⁴

¹ Compl. at 1-2 (Feb. 18, 2020). Church was a Republican primary candidate in the 2020 Special Election race for U.S. Representative in Wisconsin’s 7th District. Church lost the primary election with 42.5% of the vote.

² *Id.* The Complaint also alleges that Church failed to file his Personal Disclosure Affidavit, however this issue is not under the Commission’s jurisdiction. *Id.*

³ Resp. at 1-2 (Mar. 11, 2020). *See also* <https://www.fec.gov/help-candidates-and-committees/dates-and-deadlines/2020-reporting-dates/special-election-report-notice-wi07/>. The Committee filed its 2020 Pre-Primary Report on February 6, 2020, and filed twelve 48-Hour Notices of Contributions Received.

⁴ *Id.* at 2-3.

