



FEDERAL ELECTION COMMISSION
Washington, DC 20463

VIA ELECTRONIC MAIL

allison@ashby.law

Allison McKenzie

Ashby Law

602 Cameron Street, Suite 102

Alexandria, VA 22314

August 12, 2020

RE: MUR 7699
Church for Wisconsin
and Paul Kilgore, as treasurer
Jason Church

Dear Ms. McKenzie:

On February 21, 2020, the Federal Election Commission ("Commission") notified your clients of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended (the "Act") and Commission regulations. A copy of the complaint was forwarded to your clients at that time. On August 6, 2020, based upon the information contained in the complaint and information provided by respondents, the Commission voted to dismiss allegations that Church for Wisconsin and Paul Kilgore, in his official capacity as treasurer, and Jason Church, violated provisions of the Act. The Commission then closed its file in this matter. A copy of 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 Statement of Policy Regarding Disclosure of Closed Enforcement and Related Files, 68 Fed. Reg. 70,426 (Dec. 18, 2003) and Statement of Policy Regarding Placing First General Counsel's Reports on the Public Record, 74 Fed. Reg. 66132 (Dec. 14, 2009). If you have any questions, please contact Don Campbell, the attorney assigned to this matter, at (202) 694-1650.

Sincerely,

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

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.

