



May 6, 2019

Lisa J. Stevenson, Esquire Acting General Counsel Federal Election Commission 1050 First Street, N.E. Washington, D.C. 20463

RE: Advisory Opinion Request

Dear Ms. Stevenson:

Pursuant to 52 U.S.C. § 30108 I am writing as the founder and Chairman of Mad Dog PAC to request an advisory opinion on the permissibility of the commercial marketing plan as outlined below under the applicable Federal Election Commission statute and regulations.

## Mad Doc PAC

Mad Dog PAC [FEC Committee ID: C00663211] engages in high-visibility, high-impact, peaceful activities - broadly anti-Trump, anti-GOP and anti-NRA in nature - with a specific focus on generating support for the removal of Donald J. Trump from office by impeachment or the ballot.

Unlike PACs funded by wealthy individuals or special interest groups, Mad Dog PAC relies exclusively on grass root volunteer and economic support from citizens who want to make a difference. Individual donations and merchandise sales are our only means of funding this mission.

## **Proposed Marketing Plan**

We intend to sell T-Shirts featuring the facial likenesses of various candidate members of the Democratic Party seeking that party's nomination in the 2020 presidential election. Photographic mock-ups of the front of several representative T-Shirts are attached. The T-Shirts will be sold through our website at <a href="https://maddogpac.com">https://maddogpac.com</a>.

The goal of this campaign is two-fold. First, we will increase citizen involvement by encouraging awareness and enthusiasm with the liberal values we espouse, in this instance as collectively articulated by the campaigns of various significant potential Democratic Party nominees.

## GO. FIGHT. WIN.

www.MadDogPAC.com info@MadDogPAC.com 2000 14<sup>th</sup> Street NW Suite 104 Box 73071 Washington, DC 20056 Second, we will raise money to continue and expand our efforts to advance the Mad Dog PAC agenda.

You will note the T-Shirt design is comprised of and limited to duplicate images of a candidate surrounded by a border repeating that candidate's name. The only other writing anywhere on the garment will be the addition of the Mad Dog PAC logo and/or URL. Our marketing of these shirts will be expressly limited to the promotion of Mad Dog PAC and its values. To the extent an individual T-Shirt sale presumptively favors one candidate over the others, that candidate support will be the decision of the purchaser, not Mad Dog PAC.

## **Additional Thoughts**

Unlike the T-Shirt proposal addressed by the Commission in Advisory Opinion 1976-50, we will not share any sales proceeds with any candidate or other committee.

Our T-Shirt also differs significantly from that reviewed by the Commission in Advisory Opinion 1994-30. Our T-Shirt promotion will not advocate the election or defeat of any individual candidate, or solicit contributions for any candidate or committee. In keeping with the guidance provided by the Opinion, we will not share any information on the details of our T-Shirt promotions or coordinate our marketing efforts with any candidates or their campaigns.

Since the present universe of candidates is larger than is economically feasible to accommodate with individual T-Shirts, we plan to limit our initial offering to no more than ten different shirts. The selection criteria which we expect to apply and the price we will charge will be based on economic considerations consistent with our goal of maximizing funding to support our mission.

Because we do not endorse or favor the candidacy of any individual candidate, candidate information, slogans, website links or any other information which might assist voters in finding or donating to a particular campaign will be excluded from our marketing materials.

We appreciate the Commission's consideration of this request, and I look forward to its response. If you or the Commission have any questions or concerns please contact me at claude@maddogpac.com or at the mailing address shown below.

Respectfully,

an a

Claude Taylor, Chairman Mad Dog PAC

attachments



www.MadDogPAC.com info@MadDogPAC.com 2000 14<sup>th</sup> Street NW Suite 104 Box 73071 Washington, DC 20056 Mad Dog PAC

Four proposed T-Shirts for sale at MadDogPAC.com



Dear Ms Helmsley, your Assistance. Claude Taylor. Your email is correct in all its particulars. We appreciate

Sent from my iPhone

On Jun 4, 2019, at 3:52 PM, Cheryl Hemsley <<u>chemsley@fec.gov</u>> wrote:

Mr. Taylor,

Thank you for taking the time to speak with me and Mr. Knop this afternoon regarding your letter dated May 6, 2019, on behalf of Mad Dog PAC. Kindly either confirm the accuracy of the following supplementary information or correct as necessary:

- <!--[if !supportLists]-->1. <!--[endif]-->Mad Dog PAC will use only open source photos of candidates on the t-shirts discussed in your letter and will not obtain any of the photos from the featured candidates' authorized committees or any other political committee; and
- <!--[if !supportLists]-->2. <!--[endif]-->Mad Dog PAC, in addition to the source prohibition questionnaire already included on its website "Shop" page, intends to provide information to the effect that the entire purchase price of the t-shirts discussed in the letter constitutes a contribution to Mad Dog PAC.

Your response may be considered part of your advisory opinion request; if so, it will be posted as such on the Commission's website.

Best Regards, Cheryl Hemsley Attorney, Policy Division Office of General Counsel Federal Election Commission