

June 21, 2018

OFFICE OF
GENERAL COUNSEL

2018 JUN 27 AM 10:13

Office of General Counsel
Federal Election Commission
1050 First Street, NE
Washington, DC 20463

MUR # 7420

To whom it may concern:

Please accept this letter as a Complaint filed pursuant to 52 U.S.C. § 30109(a) and 11 C.F.R. § 111.4 against Gregory for Congress and Jeffrey Casale, in his official capacity as Treasurer, for violation of the Federal Election Campaign Act of 1971 (the "Act"), as amended, and Federal Election Commission (the "Commission") regulations.

Based on information and belief and the facts outlined below, Gregory for Congress has violated the Act and Regulations by failing to report in-kind contributions from Town of Babylon Democratic Committee in violation of 52 U.S.C. § 30104(b)(3)(B) and 11 C.F.R. § 104.3(a)(4)(ii).

Statement of Facts

The contact address listed at www.duwaynegregory.com and www.babylondeinocrats.com are identical (74 East Sunrise Highway, Lindenhurst). Please reference the attached evidence marked A and B.

DuWayne Gregory tagged himself and volunteers via Instagram at The Town of Babylon Democratic Committee on April 18, 2018. Please reference the attached evidence marked C, D, E, and F.

Per DuWayne Gregory's post on Facebook dated May, 27, 2018, he advertised a day of action with address listed 74 East Sunrise Highway, Lindenhurst. Please reference the attached evidence marked G.

Relevant Law and Analysis

Section 30104(b)(2) of the Act and Section 104.3(a) require that candidate committees report to the Commission the total receipts received by the committee during a reporting period. In addition, the committee must itemize all contributions, monetary and in-kind, that aggregate to \$200 or more during the election cycle. Contributions *of any amount* from another political committee must be itemized. The definition of "contribution" includes the provision of goods or services without charge, including facilities. 11 C.F.R. § 100.52(d)(1).

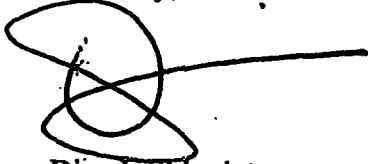
Candidates for New York's Second District Democratic Primary election on June 26, 2018 had a pre-primary report due on June 14, 2018, covering receipts and disbursements between April 1 and June 6, 2018. The Gregory for Congress pre-primary report did not include any in-kind contributions for use of office space outlined in the Statement of Facts, nor did it report any expenditures for use of office space. This is a violation of the Act's reporting requirements.

Conclusion

Based upon the facts stated here and upon information and belief, Gregory for Congress and Jeffrey Casale, in his official capacity as Treasurer, have violated the Act and the Commission's regulations by failing to report in-kind contributions for use of office space. Therefore, I respectfully request that the Commission find reason to believe that Gregory for Congress violated the Act and the Commission's regulation and open an investigation into the matter.

This Complaint is accurate and correct to the best of my knowledge and beliefs.

Sincerely,

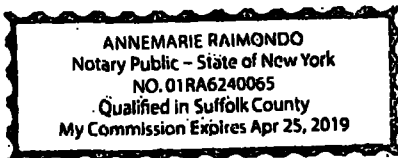


Dina L. Shingleton

Signed and sworn before me on this 21 day of June, 2018.



Signature of Notary





A



Contact Us

If you'd like to mail a check, please make checks payable to:

Gregory For Congress

PO Box 406

Copiague, NY 11726

Call us at (631) 530 - 5518

Email us at info@duwaynegregory.com

Visit us at 74 E. Sunrise Highway Lindenhurst, NY 11757

Share this



COMMENTS



babylondemocrats.com

B



Town of Babylon Democratic Committee
 74 East Sunrise Highway, Lindenhurst, New York 11757 | t. 631.991.3081 | info@babylondems.com

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Contact Us



Babylon Democratic Committee

74 East Sunrise Highway
Lindenhurst, NY 11757

Tel: 631-991-3081 | info@babylondemocrats.com

You can reach us using the information above or send us an email by using the contact form below.

First Name *

Last Name *

Your e-mail address *

Subject *

Message *

C

Verizon LTE 6:41 PM 6%

Post

gregoryforny2
Town of Babylon Democratic Committee



Liked by minoritymillennials, suemollerl and 67 others
gregoryforny2 Our amazing interns teaching me about social media.

View all 3 comments

APRIL 16



D

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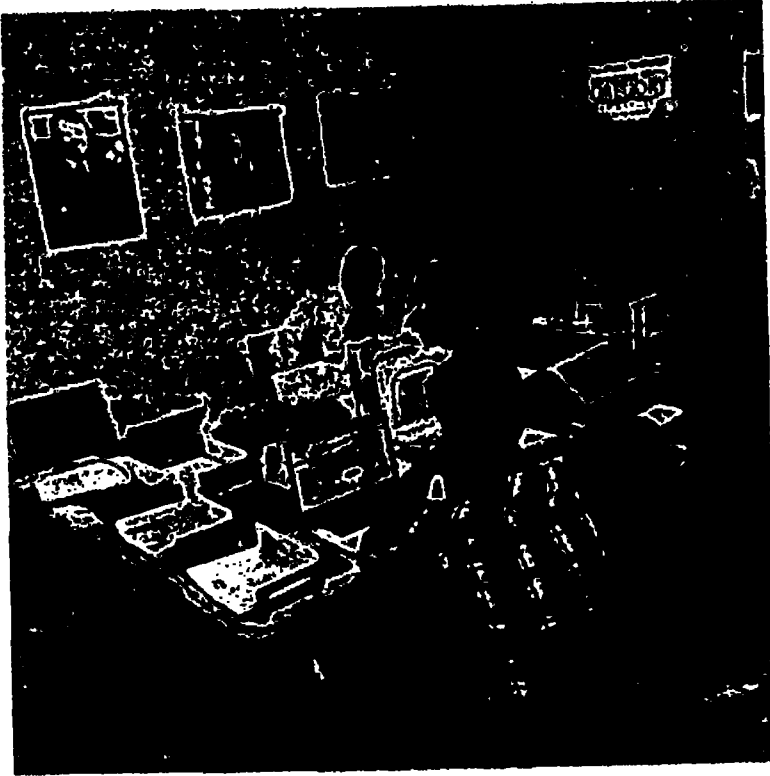
Post



gregoryforny2

Town of Babylon Democratic Committee

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Liked by minoritymillennials, suemollerfi and 67 others

gregoryforny2 Our amazing interns teaching me about social media.

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APRIL 18



E

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Post



gregoryformy2

Town of Babylon Democratic Committee

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gregoryformy2 Come by and volunteer! Our address is 70-76 Hedwig street (74s sunrise highway)

View all 4 comments

got_checked Thank you for always supporting youth and

our #notchecked? campaign... we do appreciate you



F

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6:41 PM

5%



Post



gregoryforny2

Town of Babylon Democratic Committee

...



Liked by solinyevents, minoritymillennials and 40 others
gregoryforny2 Come by and volunteer! Our address is
70-76 Hedwig street (74s sunrise highway)

View all 4 comments

got_checked Thank you for always supporting youth and
our "got checked?" campaign... we so appreciate you





DuWayne Gregory
@GregoryForCongress

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DuWayne Gregory
May 27 at 12:08 PM

Every Saturday is a Day of Action for #TeamGregory! Join us!!

DuWAYNE GREGORY
FOR CONGRESS

Saturday Days of Action

Knock Doors! Make Calls! Help get Du Wayne Elected!

May 26th: 10AM - 8PM
June 2nd: 10AM - 8PM
June 8th: 10AM - 8PM
June 16th: 10AM - 8PM

Address: 74 E Sunrise Hwy, Lindenhurst, NY 11757
(Off N. Clinton St and Sunrise Hwy)
Contact Tyler at tyler@gregoryforcongress.com with any questions

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Political Organization

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Re-Elect Valerie M. C... Like

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