

OFFICE OF
GENERAL COUNSEL

October 26, 2018

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Office of General Counsel
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Dear Sir or Ma'am:

Lara Trump, daughter-in-law to President Donald Trump, violated Federal Election Campaign Laws on or about September 28, 2018, by donating \$10,000.00 to a 501c3 non-profit organization from the Donald J. Trump Campaign Fund. Paws Place Dog Rescue, located in Winnabow, NC, was the recipient of this donation. Paws Place is a 501c3 entity. The FEIN # is 56-2146059.

Peggy Durso, Director of Operations of Paws Place, accepted the donation from Lara Trump. The purpose of the donation was to help rebuild the kennels destroyed by the flooding during Hurricane Florence.

The donation was widely publicized in the local media, on the Paws Place Facebook page, and on Lara Trump's Facebook page (*see supporting documents*).

Lara Trump (**Respondent**) serves as senior advisor to the Donald J. Trump 2020 reelection campaign. I believe her address is: Trump Parc East,
14G, New York, NY 10019.

According to the Federal Campaign Laws publication,

§ 30125. Soft money of political parties

(C) Prohibiting involvement of national parties, federal candidates and officeholders, and state parties acting jointly. Notwithstanding subsection (e) (other than sub-section (e)(3)), amounts specifically authorized to be spent under subparagraph (B)(iii) meet the requirements of this subparagraph only if the amounts—

(d) Tax-exempt organizations. A national, State, district, or local committee of a political party (including a national congressional campaign committee of a political party), an entity that is directly or indirectly established, financed, maintained, or controlled by any such national, State, district, or local committee or its agent, and an officer or agent acting on behalf of any such party committee or entity, shall not solicit any funds for, or make or direct any donations to—

(1) an organization that is described in section 501(c) of the Internal Revenue Code of 1986 and exempt from taxation under section 501(a) of such Code (or has submitted an application for determination of tax-exempt status under such section) and that makes expenditures or disbursements in connection with an election for Federal office (including expenditures or disbursements for Federal election activity);

Enclosed is a Facebook posting from Paws Place Dog Rescue dated Oct. 5, 2018. Also enclosed is an article posted by WECT News on Sept. 28, 2018. In addition, I have enclosed an article published September 29, 2018, in the Wilmington, NC newspaper the *Star-News*.

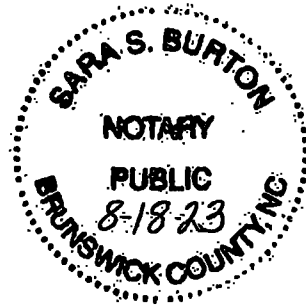
In the past, Lara Trump donated money to Paws Place out of her own pocket. When she married Eric Trump, she asked guests to send checks to Paws Place rather than purchase wedding gifts. Lara Trump should have continued to donate to Paws Place from her personal finances, rather than violate Federal Election Campaign Laws.

Cordially,

Renee S. Clement
Renee Shawn Clement (**Complainant**)

Southport, NC 28461

WCDUC/ID
Sara S Burton



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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Office of Inspector General

October 23, 2018

Dear Ms. Clement:

Thank you for submitting a complaint to the Federal Election Commission (FEC) Office of Inspector General (OIG). We take all complaints seriously and thoroughly review each submission.

It is natural to want to know what has happened to your complaint once we receive it. However, all OIG complaints and investigative matters are confidential under the Inspector General Act of 1978, as amended, and other laws and regulations. Confidentiality is critical for the OIG to be able to effectively and independently conduct administrative and criminal investigations. Therefore, our office does not provide notice of the opening or closing of complaint-based inquiries or investigations, or information regarding the progress, developments, decisions, results or outcomes of complaint-based inquiries or investigations.

There are two instances in which you might hear back from the OIG. The first of these is if a complaint is misfiled with our office when it should have been filed with another FEC office or another agency, such as the Department of Justice or Election Assistance Commission. Second, in some instances, we may need to contact you for additional information to be able to proceed with an inquiry.

IMPORTANT NOTICE: Complaints involving an alleged violation of federal election or campaign finance law fall under the jurisdiction of the FEC Office of General Counsel (OGC), not the Office of Inspector General. The OIG does not forward or transfer election and campaign finance law complaints to the OGC due to statutory requirements set forth in the Federal Election Campaign Act of 1971, as amended, specifically 2 U.S.C. 437g(a)(1). Therefore, if your complaint involves an alleged violation of federal election or campaign finance law, you must file it directly with the OGC and follow the guidelines found at <http://www.fec.gov/pages/brochures/complain.shtml>. Mary Beth Debeau, an OGC paralegal, is available to assist you with the complaint filing process, and she may be reached toll-free at 800-424-9530 (press 0, then extension 1650), or locally at 202-694-1650.

Complaints regarding voter or election fraud, candidate eligibility or fraud, access to or issues involving polling places, or voter intimidation or harassment should generally be directed to the U. S. Department of Justice or local and state authorities.

Please do not hesitate to contact us with any additional information you believe might be relevant to your complaint.

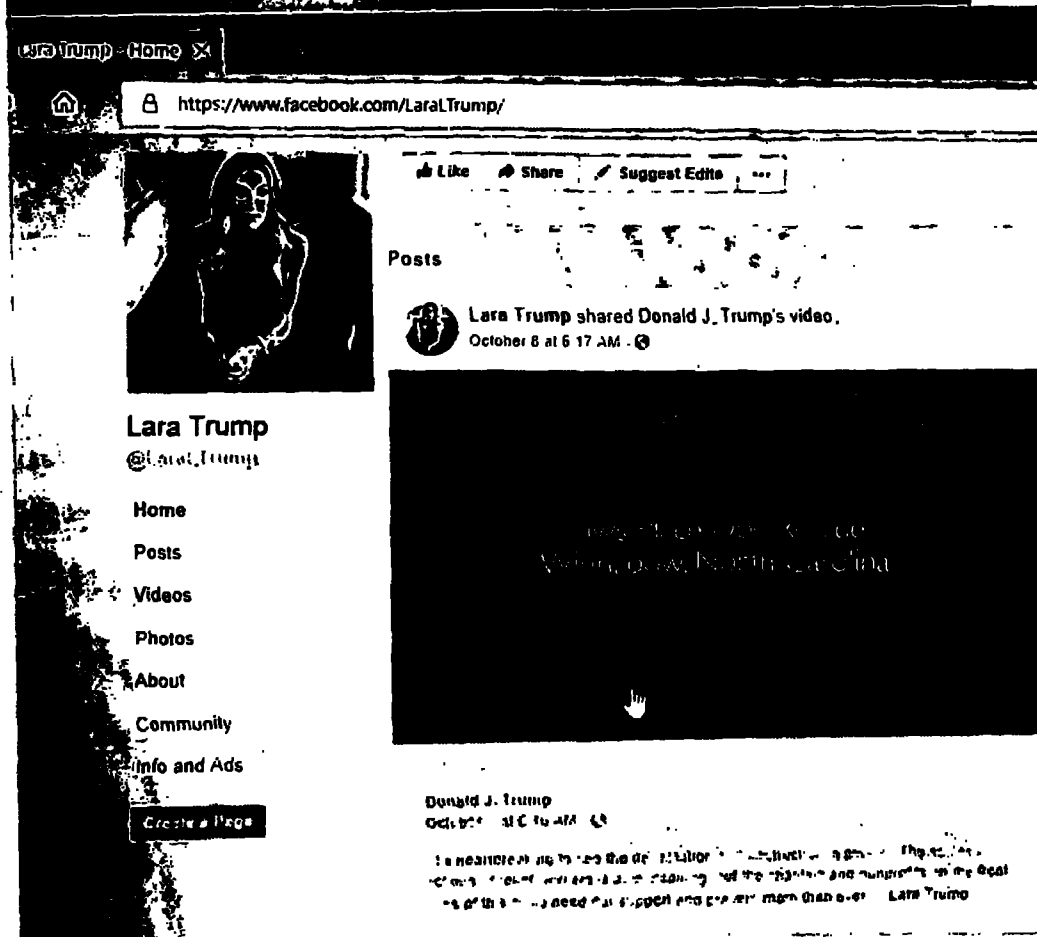
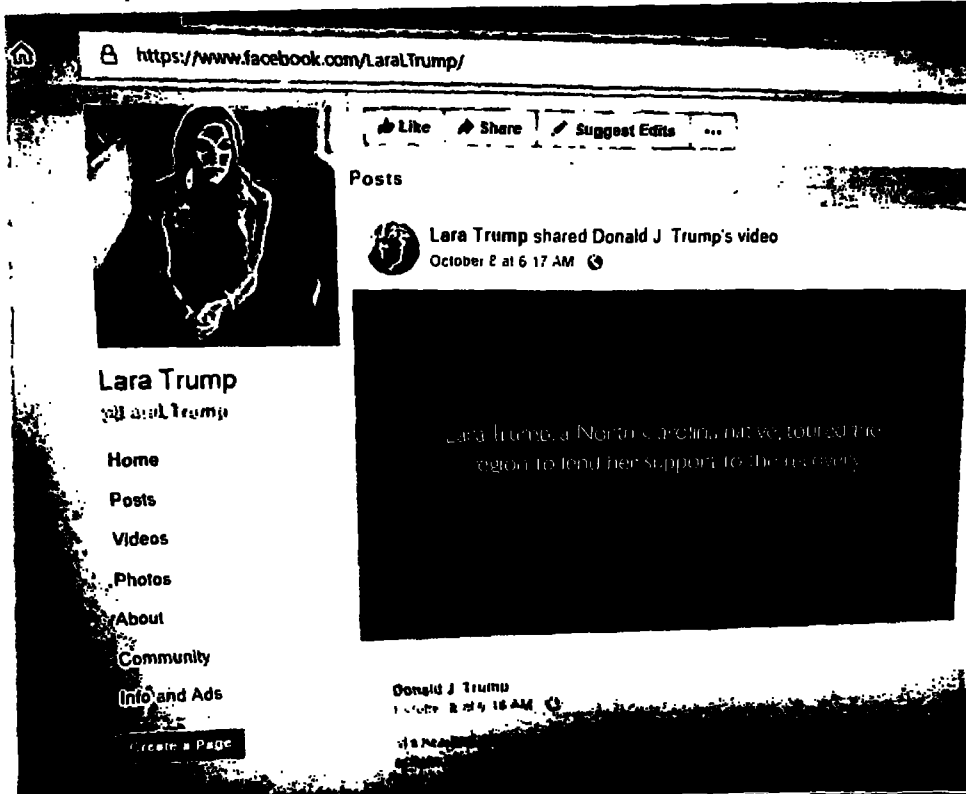
Handwritten signature of Carla Smith in cursive script.

Carla Smith

Counsel to the Inspector General and Chief Investigator

Screen shots from video posted on Lara Trump's Facebook page on Oct. 8, 2018

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Final Screen shot from video posted on Lara Trump's Facebook page on Oct. 8, 2018

<https://www.facebook.com/LaraLTrump/>



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@LaraLTrump

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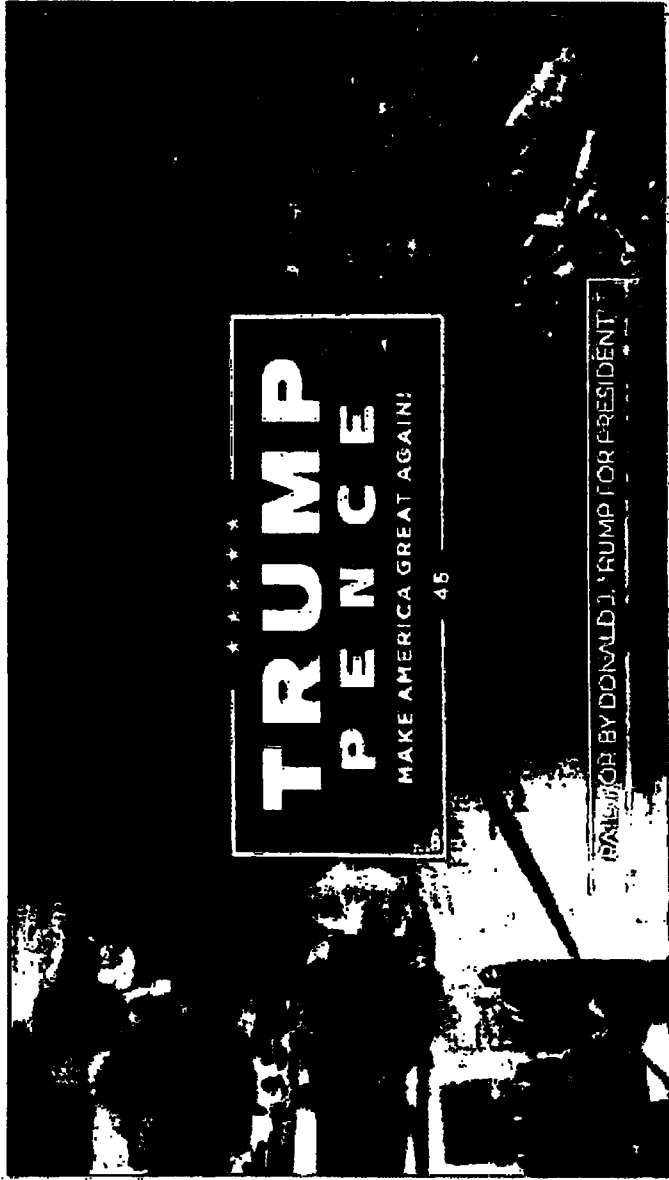
See All

Posts



Lara Trump shared Donald J. Trump's video.

October 8 at 6:17 AM · 🌐



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Report Abuse



Paws Place Dog Rescue

October 5 at 6:34 PM ·

We want to express our sincere gratitude to Lara Yunaska Trump for for visiting Paws Place at this critical time to bring us the donation of \$10,000 from the Trump Campaign to help us rebuild our kennel facility. Lara is from Wrightsville Beach and has been a good friend, volunteer, and supporter of Paws Place for many years. She was the first one to reach out to us to see how we managed in the storm. Lara has been busier lately, but she's never forgotten us. We are fortunate to have so many wonderful, long-time supporters to help us in our mission. We are eager to get back on our feet so we can begin to rescue dogs that have been abandoned or misplaced as a result of Hurricane Florence.



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Lara Trump surveys damage in Brunswick County

Local native revealed \$10,000 donation to Paws Place

By Hunter Ingram
StarNews Staff

WINNABOW — Tears welled up in Peggy Durso's eyes as soon as Lara Trump went in for the hug.

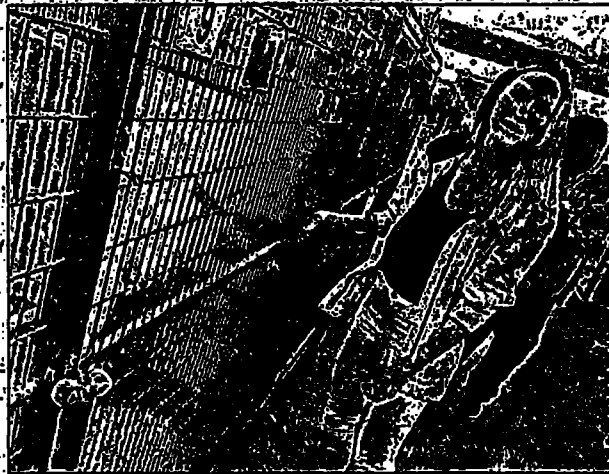
The two know each other well, so the lengthy embrace was more than a single gesture. It was a reunion.

Trump, the daughter in law of President Donald Trump and a Wrightsville Beach native, has been a supporter of and volunteer at Durso's Paws Place for more than five years — well before she became a member of the nation's first family and Paws Place moved into its Winnabow facility in 2017 after two decades as an outdoor facility.

On Friday, Trump stopped by to check in on Durso and staff as she toured Brunswick County, surveying the damage done by Hurricane Florence.

"Lara was the first one to reach out to us to see how we managed in the storm," Durso said. "She's been a good friend to us. She's been busier lately, but she's never forgotten us."

Trump had already toured the devastated Stoney Creek community in Leland, and would soon head to the food distribution center at Brunswick Baptist Association and Brunswick County Animal



Wrightsville Beach native Lara Trump visits Paws Place in Winnabow Friday as she toured areas in Brunswick County damaged by Hurricane Florence. [HUNTER INGRAM/STARNEWS]

Shelter. Like so many, Paws Place is still hurting from the storm. Right inside the front door, the destruction was immediately clear.

"It's overwhelming," Durso said, scanning the building. "We lost all of our equipment and our furniture. We lost everything."

All operations, including feeding and cleaning, have to move into the kennel portion of the facility, which was spared by much of the flooding damage.

After their long hug, Trump joined Durso to tour the facility, showing her the damage and the recovery efforts already well underway. After greeting the dogs — hyper and barking in their kennels — Trump let Durso know she hadn't visited empty handed.

The president's 2020 reelection campaign, for

which Lara is a senior advisor, will donate \$10,000 to Paw Place's recovery fundraiser.

Durso's tears resurfaced hearing the news.

Their Crowdrise online fundraiser has already raised more than \$24,000, but it's only a portion of what they need.

"We need at least \$80,000 or \$100,000 to get back where we were," Durso said.

Processing the devastation at Paws Place and in the surrounding community, Trump said what she's seen has been shocking.

"It is really horrible," she said. "People, houses are completely destroyed, some with water to the second floor. Those people have such a long road to recovery."

Reporter Hunter

Ingram can be reached at Hunter.Ingram@StarNewsOnline.com.

Lara Trump helps Paws Place shelter by donating money



Lara Trump visits Paws Place shelter in Brunswick County and donates \$10,000.
(Source: WECT)

By Caroline Burkard | September 28, 2018 at 2:09 PM EST -
Updated September 28 at 5:26 PM

WILMINGTON, NC (WECT) - Brunswick County was hit hard by Hurricane Florence, leaving hundreds without homes due to significant flooding, including the new Paws Place shelter.

Paws Place board member Peggy Durso says the shelter is not in a flood zone, so it didn't feel the need to get flood insurance.

However, the building had to be gutted after the storm. "We need all the help we can get because we don't know if insurance is going to cover us or not because we didn't

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have flood insurance," Durso said. "We're not in a flood zone, like many people."

Wrightsville Beach native Lara Trump made appearances in Brunswick County on Friday and toured Paws Place shelter, where she has a longstanding relationship with Durso.

The no-kill dog shelter endured significant flooding while housing 24 dogs during the hurricane. No dogs were hurt during the storm.

Durso says repairs will cost nearly \$100,000.

"It's been more traumatic than I've allowed myself to think about because being here and living it is something entirely different," Durso said. "Being evacuated by the National Guard, it's just something you think only happens to other people."

Trump donated \$10,000 from the Trump campaign to help get Paws Place back on its feet.

"It's a small portion to what they're going to need ultimately, but it's just a little something to get them on the way to recovery," Trump said.

Trump made other appearances at the Brunswick County Animal Shelter and the Brunswick Baptist Association, which is storing food, water and other household supplies for hurricane survivors.

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Contact Information

Catherine Helgesen, President
Paws Place Board of Directors

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Wilmington, NC 28411

Phone

Peggy Durso, Director of Operations of Paws Place

Member of Paws Place Board of Directors

Phone 330-416-4748

Home address:

Southport, NC 28461

Tony Durso, Treasurer of Paws Place

Phone 330-416-4391

Home address:

Southport, NC 28461

Member of Paws Place Board of Directors

Paws Place Dog Rescue website

www.pawsplace.org

Paws Place FEIN number is: 56-2146059

Paws Place Physical Address:

Paws Place

242 George II Highway

Winnabow, NC 28479

Paws Place Mailing Address:

Paws Place

P.O. Box 67

Winnabow, NC 28479

180044447442000



The Restriction of Political Campaign Intervention by Section 501(c)(3) Tax-Exempt Organizations

Under the Internal Revenue Code, all section 501(c)(3) organizations are absolutely prohibited from directly or indirectly participating in, or intervening in, any political campaign on behalf of (or in opposition to) any candidate for elective public office. Contributions to political campaign funds or public statements of position (verbal or written) made on behalf of the organization in favor of or in opposition to any candidate for public office clearly violate the prohibition against political campaign activity. Violating this prohibition may result in denial or revocation of tax-exempt status and the imposition of certain excise taxes.

Certain activities or expenditures may not be prohibited depending on the facts and circumstances. For example, certain voter education activities (including presenting public forums and publishing voter education guides) conducted in a non-partisan manner do not constitute prohibited political campaign activity. In addition, other activities intended to encourage people to participate in the electoral process, such as voter registration and get-out-the-vote drives, would not be prohibited political campaign activity if conducted in a non-partisan manner.

On the other hand, voter education or registration activities with evidence of bias that (a) would favor one candidate over another; (b) oppose a candidate in some manner; or (c) have the effect of favoring a candidate or group of candidates, will constitute prohibited participation or intervention.

Page Last Reviewed or Updated: 04-Sep-2018

10/21/18 11:40 AM