

TOM TIFFANY

U. S. C O N G R E S S

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by Kathryn Ross
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March 3, 2020

VIA E-MAIL

Jeff S. Jordan, Esq.
Assistant General Counsel
Complaints Examination & Legal Administration
Federal Election Commission
1050 First Street NE
Washington, DC 20463

cela@fec.gov

Re: MUR 7704

Dear Mr. Jordan:

We have reviewed the complaint filed by Joanna Opela on February 16, 2020 (the “Complaint”) alleging various violations of federal campaign finance and ethics law by Tiffany for Wisconsin (“the Committee”). As described below, these allegations have no legal or factual foundation.

The Complaint alleges that Forms 1 and 2 do not provide sufficient address information as filed by the Committee. Upon review and consultation with the committee’s FEC Analyst, we have confirmed that both reports provide sufficient and appropriate address information as filed and that Form 2 does, in fact, provide a street address sufficient to establish the residency of the candidate.

The Complaint alleges that the Committee failed to file a 2019 Year End report. As the Federal Election Commission is aware, this deadline was waived for committees filing the WI-07 Special Primary reports. As such, the Committee has complied with all required campaign finance disclosures.

The Complaint alleges that the candidate failed to file a Financial Disclosure Statement which is false. This allegation is false. The Financial Disclosure Statement was filed in a timely manner in October 2019.

The Complaint alleges that the committee’s social media is missing disclaimer statements and Stand by Your Ad disclaimers. This allegation is false. The Committee has reviewed the federal regulations and guidance and have discussed these concerns with the FEC Information Division staff and have concluded that there are no disclaimer violations contained within any committee social media postings.

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The Complaint alleges that the Committee has disseminated TV and radio ads and yard signs without appropriate disclaimer statements. This allegation is false. The Committee has not disseminated any ads without proper disclaimers and does not know to what this allegation would be in reference. The Committee has a policy and approval process for committee disclaimers on all materials paid for and disseminated by the committee and all bear the appropriate disclaimers.

For the reasons set forth in this response, the committee respectfully requests that the Commission find there is no reason to believe that Tiffany for Wisconsin violated federal regulations and promptly dismiss this matter.

Sincerely,



Tom Tiffany