



**FEDERAL ELECTION COMMISSION**  
Washington, DC 20463

August 12, 2020

**VIA ELECTRONIC MAIL**

Peter J. Corrigan, Treasurer  
Laverne Gore for Congress  
PO Box 22649  
Beachwood, OH 44122  
[peterjcorrigan@cs.com](mailto:peterjcorrigan@cs.com)

RE: MUR 7656

Dear Mr. Corrigan:

On October 30, 2019, the Federal Election Commission (“Commission”) notified Laverne Gore for Congress and you, as treasurer, 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 you at that time. On August 6, 2020, based upon the information contained in the complaint and information provided by you, the Commission voted to dismiss allegations that Laverne Gore, Laverne Gore Congress, and you, 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 Cerissa Cafasso, the attorney assigned to this matter, at (202) 694-1210.

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:** 7656

**Respondents:** Laverne Gore for Congress  
and Peter J. Corrigan,  
as Treasurer  
("the Committee")  
Laverne Gore<sup>1</sup>

**Complaint Receipt Date:** October 28, 2019

**Response Date:** November 13, 2019

**EPS Rating:**

**Alleged Statutory &  
Regulatory Violations:**

**52 U.S.C. §§ 30101(2); 30103(a); 30120(a)(1)  
11 C.F.R. §§ 102.1(a); 110.11(a)(1)**

The Complaint alleges that the Committee's October 18, 2019, video announcing Gore's candidacy did not contain the required disclaimer,<sup>2</sup> and the Committee had not filed disclosure forms with the Commission.<sup>3</sup> The Response states that the Committee was not required to file disclosure reports because it had not raised any money before October 18, 2019, and as of the date of the response, it had collected less than \$5,000 in contributions.<sup>4</sup> The Response further notes that the Committee has added a disclaimer to its announcement video.<sup>5</sup>

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<sup>1</sup> Gore is currently a candidate for Ohio's eleventh district in the U.S. House of Representatives.

<sup>2</sup> Compl. at 1 (Oct. 28, 2019). The link to the video announcement provided in the Complaint leads to a page stating: "This video has been removed by the user." See [https://youtu.be/wp0TmXC\\_W08](https://youtu.be/wp0TmXC_W08), provided in Compl. at 1.

<sup>3</sup> Compl. at 1. The Complaint also refers to a company logo at the end of the original announcement video "possibly of the production company." *Id.* As previously noted, the video to which the Complaint refers is not available. The announcement video currently accessible from Committee's website and available on the "Laverne Gore" channel on YouTube (which also bears a "Laverne Gore for Congress" logo) does not contain a company logo. See <https://youtu.be/JzLTwzfazPc>.

<sup>4</sup> Resp. at 1-2 (Nov. 13, 2019). The Committee filed a Form 2 (Statement of Candidacy) on October 18, 2019 (see <https://docquery.fec.gov/pdf/109/201910189165049109/201910189165049109.pdf>) and Gore filed a Form 1 (Statement of Organization) on October 25, 2019 (see <https://docquery.fec.gov/pdf/593/201910259165300593/201910259165300593.pdf>).

<sup>5</sup> Resp. at 1-2 (Nov. 13, 2019). The Committee states it added a disclaimer on October 25, 2019. *Id.* The current version of the video has a written disclaimer that reads, "Paid for by Laverne Gore 4 Congress," and in the video, Gore twice tells the viewer that she is running for Congress. See Laverne Gore, *Laverne's Big Announcement*, YOUTUBE, <https://youtu.be/JzLTwzfazPc> (last accessed on Dec. 10, 2019).

Based on its experience and expertise, the Commission has established an Enforcement Priority System using formal, pre-determined scoring criteria to allocate agency resources and assess whether particular matters warrant further administrative enforcement proceedings. These criteria include (1) the gravity of the alleged violation, taking into account both the type of activity and the amount in violation; (2) the apparent impact the alleged violation may have had on the electoral process; (3) the complexity of the legal issues raised in the matter; and (4) recent trends in potential violations and other developments in the law. This matter is rated as low priority for Commission action after application of these pre-established criteria. Given that low rating, the Committee's remedial actions, and unlikelihood that the general public would have been misled as to the party responsible for the video, we recommend that the Commission dismiss the Complaint consistent with the Commission's prosecutorial discretion to determine the proper ordering of its priorities and use of agency resources. *Heckler v. Chaney*, 470 U.S. 821, 831-32 (1985). We also recommend that the Commission close the file as to all Respondents and send the appropriate letters.

Lisa J. Stevenson  
Acting General Counsel

Charles Kitcher  
Acting Associate General Counsel

12.16.19  
Date

BY:   
Stephen Gura  
Deputy Associate General Counsel

  
Jeff S. Jordan  
Assistant General Counsel

  
Cerissa Cafasso  
Attorney