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By Office of the Commission Secretary at 10:42 am, Mar 15, 2023

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FEDERAL ELECTION COMMISSION

MARCH 14, 2023 11:30 AM

OFFICE OF GENERAL COUNSEL

Sarah Locke, Executive Director
Connecticut Democratic State Central Committee
750 Main Street, Suite 1108-3
Hartford, CT 06103

SENSITIVE

Complainant,

MUR 8121

v.

Mrs. Jayme Stevenson

[REDACTED]
Darien, CT 06820

JAYME STEVENSON FOR CONGRESS
and Mr. William G. Parrett in his official capacity
as Treasurer
24 East Ave #134
New Canaan, CT 06840

Respondents.

COMPLAINT

This complaint is filed against Mrs. Jayme Stevenson in her capacity as a former candidate for Congress in Connecticut's fourth district, and Mr. William G. Parrett in his official capacity as Treasurer, for violating Federal Election Commission regulations by filing a falsely disclosed report.

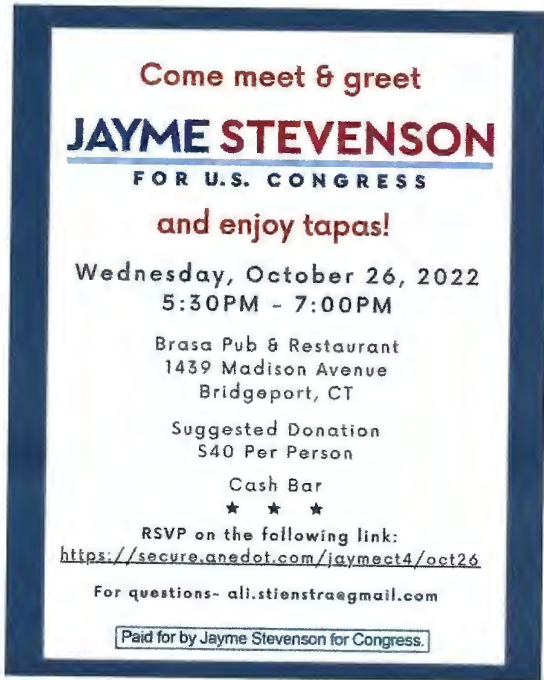
There is reason to believe Stevenson's campaign knowingly and willfully violated 52 U.S.C. § 30104(b) by filing a falsely disclosed post-general report for the 2022 cycle, including deliberately reporting inaccurate contribution figures that do not reflect campaign fundraising, as well as inaccurate expenditure activity.

STATEMENT OF FACTS AND EVIDENCE

In no less than three instances between October 20 and November 8, 2022, candidate Stevenson hosted fundraisers supporting her candidacy in Bridgeport, Norwalk, and Stamford. In each instance suggested donations were listed on event invitations, with corresponding event-specific contribution links.

Given this explicit campaign fundraising activity and lack of disclosure of both receipts received and expenditures in-kind or otherwise related to these events, it is clear that Jayme Stevenson is in violation of FEC law.

1. Jayme Stevenson advertised an October 26th fundraiser in Bridgeport, Connecticut



1a. Jayme Stevenson Facebook post from the October 26th fundraiser



Jayme Stevenson is in Bridgeport.

October 27, 2022 . 🌐

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Thank you [Brasa Pub & Restaurant](#) for providing delicious tapas and a gorgeous setting for last night's gathering!

And a very special thanks to all those who came out for great food and conversation -- I appreciate your support and look forward to representing you as your next Congresswoman!

[#USCongress](#) [#Connecticut](#) [#BridgeportCT](#) [#TeamJayme](#) [#ItsTime](#) [#ChampionforConnecticut](#)



2. Jayme Stevenson advertised a November 1st fundraiser in Norwalk, Connecticut

The countdown to
Election Day is on!

Join us for a final push to help
GET OUT THE VOTE for

JAYME STEVENSON

FOR U.S. CONGRESS

Nibbles will be served & cash bar

Tuesday, November 1, 2022
5:30PM - 7:00PM

The Blind Rhino
15 North Main Street
Norwalk, CT
★ ★ ★

\$40 per person
\$250 Election Day Operation Sponsor
\$1,000 GOTV Sponsor

<https://secure.anedot.com/jaymect4/nov1>

RSVP to Ali Stienstra at ali.stienstra@gmail.com
or 973-219-5354

Paid for by Jayme Stevenson for Congress.

3. Jayme Stevenson advertised a November 2nd fundraiser in Stamford, Connecticut

The countdown to
Election Day is on!

Join us for a final push to help
GET OUT THE VOTE for

JAYME STEVENSON

FOR U.S. CONGRESS

Nibbles will be served & cash bar

Wednesday, November 2, 2022
5:30PM - 7:00PM

Vinny's Backyard
1078 Hope Street
Stamford, CT
★ ★ ★

\$40 per person
\$250 Election Day Operation Sponsor
\$1,000 GOTV Sponsor

<https://secure.anedot.com/jaymect4/nov2>

RSVP to Ali Stienstra at ali.stienstra@gmail.com
or 973-219-5354

Paid for by Jayme Stevenson for Congress.

3a. Jayme Stevenson Facebook post from the November 2nd fundraiser



Jayme Stevenson

November 3, 2022 · 🌐

...

On the campaign trail thru the evening at Vinnys Backyard in #stamfordct a local favorite. Thanks for the gathering and support! Cheers!

#votejayme #jaymestevenson #jayme4congress #GOTV2022 #USCongress #connecticut

Stamford Government



4. On January 26, 2023, Jayme Stevenson's campaign filed a late post-election report. This report disclosed no receipts and no disbursements during the post-general reporting period. On January 31, 2023, her campaign filed a year-end report that, again disclosed no activity during the reporting period. In addition, Mrs. Stevenson's campaign filed no 48-Hour Notices for late contributions received prior to the general election. However, based upon information and belief, we believe it was more likely that Stevenson received a number of contributions and made several disbursements during this period. To our knowledge, Mrs. Stevenson did not cease campaign operations prior to the general election and continued campaigning through and on election day. Therefore, it is clear that her campaign knowingly filed false post-election and year-end FEC reports.
5. The lack of activity on the disclosure reports is especially troubling due to the fact that it is clear that the campaign held numerous campaign fundraising events the week prior to the election. Thus, the lack of reported activity strains credulity. In addition, based upon the social media posts, it appears that the campaign may have received in-kind contributions related to these events, including possible in-kind contributions from a corporation.

REQUESTED ACTION

In light of the foregoing, the Commission should immediately investigate whether Mrs. Stevenson's campaign filed a falsely disclosed post-general report for the 2022 cycle and whether Mrs. Stevenson's campaign accepted unreported in-kind contributions from corporate sources.

If such violations are found, we request the Commission compel disclosure of any receipts and/or expenditures made in connection with fundraising events held between October 20 and November 8, 2022, as well as any other campaign activity to further Mrs. Stevenson's candidacy, enjoin Mrs. Stevenson from further violations, and fine Mrs. Stevenson the maximum amount permitted by law.

Sincerely,

Sarah Locke
Connecticut Democratic State Central Committee
750 Main Street, Suite 1108-3
Hartford, CT 06103

Notary Public
Michelle Lee Rodriguez
Notary Public State of Connecticut

My Commission Expires
November 30, 2024
Date 03/08/23

Subscribed and sworn to before me personally appeared Sarah Locke on this 8th day of March 2023, New Haven Connecticut.