



November 21, 2019

Corey R. Amundson
Chief, Public Integrity Section
U.S. Department of Justice
950 Pennsylvania Avenue, NW
Washington, D.C. 20530

Dear Chief Amundson:

The Campaign Legal Center respectfully requests that the Department of Justice exercise its authority to investigate whether Donald J. Trump, a candidate in the 2016 presidential election, his authorized campaign committee, Donald J. Trump for President, Inc., and his foundation, the Donald J. Trump Foundation, knowingly and willfully violated the soft money restrictions of the Federal Election Campaign Act (“FECA”), 52 U.S.C. § 30125(e)(1).

The attached complaint (dated July 11, 2018) and supplement (dated November 21, 2019) filed with the Federal Election Commission (“FEC”) detail the relevant facts establishing reason to believe these persons violated 52 U.S.C. § 30125(e)(1) and 11 C.F.R. § 300.61 by “solicit[ing],” “receiv[ing],” “direct[ing],” and “spend[ing]” soft money, i.e., funds “in connection with an election for federal office” that were not “subject to the limitations, prohibitions, and reporting requirements” of FECA. The evidence described in the complaint and supplement—drawn from emails and other evidence made public in the course of an investigation by the Charities Bureau of the New York State Office of the Attorney General, stipulations and judicial findings in subsequent state court proceedings, and other evidence—further indicate that these violations were knowing and willful.

Although the FEC has exclusive jurisdiction over civil enforcement of the campaign finance laws, 52 U.S.C. § 30109(a), the Department of Justice has its own separate responsibility to prosecute “knowing and willful” violations. 52 U.S.C. § 30109(d); *see generally* Dep’t of Justice, FED. PROSECUTION OF ELECTION OFFENSES (8th ed. Dec. 2017). The violations at issue here implicate one “of the principal prohibitions of FECA,” namely, the prohibition against the solicitation or receipt of “soft money” (52 U.S.C. § 30125). FED. PROSECUTION, *supra*, at 12-13.

Respectfully submitted,

/s/

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Enclosures