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July 9, 2022

SENT VIA EMAIL AND U.S. MAIL

Jared DeMarinis, Director
Candidacy and Campaign Finance Division
Maryland State Board of Elections
151 West Street, Suite 200
Annapolis, Maryland 21401

Re: VoteVets PAC

Dear Mr. DeMarinis:

The undersigned represents Catherine Curran O'Malley for Maryland. The campaign has reviewed the recent filing by the above referenced Independent Expenditure. In so doing, we believe the report is deficient in several respects and would request that the State Board of Elections investigate the sufficiency of the filing. Specifically, we feel the report violates Election Law §13–306 in the following manner:

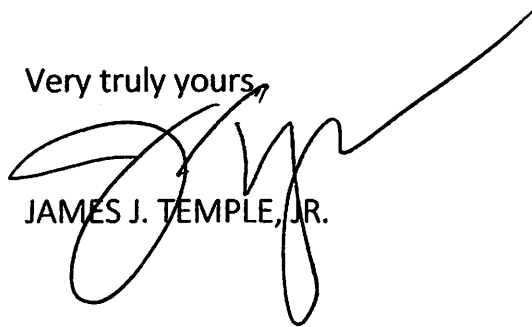
1. The report indicates that there were expenditures (by means of wire transfer) totaling \$399,651.41. However, the report only states contributions of \$275,000.00. As such, the PAC has failed to disclose the contributor(s) of the balance of \$124,651.41. Thus, the report violates the transparency provision of the above section of the Election Law.
2. Even when the report does list the contributors, it fails to adequately identify one of them. The report states that a contribution of \$25,000.00 was made by SMP. It does identify the type of entity or the address of that entity on the form. This would seem to be a clear violation of §13–306(e).

3. Additionally, it appears that the 48-hour expenditure reporting rule of §13–306 was not met. The two expenditures were made on 7/5/2022 but the report was not submitted until 7/8/2022. Moreover, if the contract for the purchase of expenditure was done prior to 7/5/2022 then §13–306(f) would apply and further substantiate a violation of the 48-hour rule.

The very purpose of §13–306 is to make sure that the public is fully advised of the involvement of entities unrelated to individual campaigns. The failure to adhere to the statutory requirements undermines its stated purpose.

Thank you for your attention to this matter.

Very truly yours,

A handwritten signature in black ink, appearing to read 'J. Temple, Jr.', with a long, sweeping flourish extending to the right.

JAMES J. TEMPLE, JR.

JJT/jjt

cc: Catherine Curran O'Malley for Maryland