



MARYLAND DEMOCRATIC PARTY

April 11, 2017

Via e-mail and U.S. Mail

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

Dear Mr. DeMarinis:

The Maryland Democratic Party (the "Party" or "MDP") files this complaint against Governor Larry Hogan, Republican candidate for re-election as Governor of Maryland, and against Larry Hogan for Governor (the "Hogan Committee"), for violations of Ann. Code Md. Election Law Art. §13-235. Specifically, it appears that a high-ranking state official, acting on behalf of the Governor, during the General Assembly session just ended, solicited contributions for a fundraising event for the Hogan Committee.

The attached e-mail from Alfred W. Redmer, Jr., Maryland Insurance Commissioner, to an individual who passed the e-mail to the MDP, asks the recipients to serve on the Host Committee for a fundraising event to be held for the Hogan Committee on July 9, 2017. The e-mail was sent on April 2, 2017, during the 2017 regular General Assembly session. The e-mail "invite[s]" the recipient to "play a leadership role" in the fundraiser by "generating" contributions of a minimum of \$1,000.

Section 13-235(b)(3) prohibits anyone "person acting on behalf of" the Governor from soliciting a contribution as to a campaign finance entity of any candidate finance entity for State office which, of course, would include the Hogan Committee. There is no reason to believe that this high-ranking state official appointed by the Governor would be acting without any authorization in soliciting contributions for the Hogan fundraising event.

Accordingly, the Maryland Democratic Party respectfully requests that the State Board conduct an investigation of this violation and determine whether this violation was knowing; and if so, refer the matter to the State Prosecutor for criminal prosecution. If the Board finds the violation was not intentional, it should, pursuant to Election Law Article §13-604(d), require return of all contributions solicited from prospective hosts through this e-mail, and impose a civil penalty in the full amount of such contributions.

Thank you for your prompt attention to this matter.

Sincerely,

Kathleen Matthews
Interim Chair

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