



State of Delaware  
Department of Elections

November 5, 2018

**Re: Committee to Elect Paradee**

Dear

In response to your complaint regarding contributions to the Committee to Elect Paradee ("Paradee Committee"), I have reviewed the records of the Delaware Campaign Finance Reporting System and learned as follows. C-11 is a political committee formed on September 12, 2018. It is organized as a political committee, not a political action committee as you state in your complaint. *See* attached Statement of Organization. It is affiliated with the Democratic Party. These two checkboxes inform the outcome of your complaint.

Let me direct your attention to 15 *Del. C.* § 8002(19) and (20), which read:

(19) "Political committee" means:

- a. Any organization or association, whether permanent or created for the purposes of a specific political campaign, which accepts contributions from or makes expenditures to any candidate, candidate committee or political party in an aggregate amount in excess of \$500 during an election period, not including independent expenditures; and
- b. *All political parties* and candidate committees. (emphasis added)

(20) "Political party" means an organization eligible to be listed on any general election ballot under § 3001 of this title, or any other organization which desires to be

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**State Election Commissioner**  
905 S Governors Ave Ste 170  
Dover DE 19904  
Phone: (302) 739-4277

**New Castle County Office**  
Carvel State Office Bldg  
820 N French St STE 400  
Wilmington DE 19801  
Phone: (302) 577-3464

**Kent County Office**  
100 Enterprise Pl Ste 5  
Dover DE 19904  
Phone: (302) 739-4498

**Sussex County Office**  
119 N Race St  
PO Box 457  
Georgetown DE 19947  
Phone: (302) 856-5367

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listed on any ballot on any election, and any constituent part of such party which receives contributions and makes expenditures. *For purposes of the contribution limits of subchapter II of this chapter, a "political party" includes all constituent parts of such party, including the statewide, county, regional, municipal and district committees, all finance committees and all other committees, subdivisions and organizations related to the political party.* (emphasis added)

Read together, for purposes of this analysis, these provisions define a political party as all committees related to the Democratic Party. One type of political committee is a political party. By organizing itself a political committee, C-11 is permitted to contribute the same amount that a political party may contribute under 15 *Del. C.* § 8010(b). The \$2000 contribution by C-11 to the Paradee Committee does not itself exceed the contribution limit imposed by 15 *Del. C.* §8010(b)(6).<sup>1</sup>

You complain as well of what you characterize as a straw-man contribution. Senate D PAC, which is a political action committee, contributed \$600 to the Paradee Committee, which is the limit imposed by 15 *Del. C.* § 8010(a). Senate D PAC also contributed \$5000 to C-11, which enabled C-11 to contribute \$2000 to the Paradee Committee. You believe that these transactions allowed C-11 to improperly circumvent contribution limits using a fictitious name. I do not agree.

Fifteen *Del. C.* § 8011 limits contributions to political parties to \$20,000 per each election period. The contribution from Senate D PAC to C-11, a political party, did not exceed this limit. Moreover, Senate D PAC did not use a fictitious name when it contributed \$5000 to C-11 and \$600 to the Paradee Committee. Each of these contributions were made in the name of the contributor. Each were fully disclosed on the filings made with the State Election Commissioner. Based on the facts that you allege, all of the contributions and expenditures at issue comply with the provisions of 15 *Del. C.* Ch. 80.

I trust I have addressed all of the issues raised in your October 29, 2018 complaint. I thank you for your inquiry.

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<sup>1</sup> The total contribution amount from all of the constituent parts of the Democratic Party to the Paradee Committee may not exceed \$5000. You do not allege that the Democratic Party exceeded this limit. In light of your complaint, however, I have researched the records of the Delaware Campaign Finance Reporting System and determined that the total amount of contributions by the Democratic Party to the Paradee Committee did not exceed the statutory limit of \$5000 imposed by 15 *Del. C.* § 8010(b)(6).

November 5, 2018

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Very truly yours,

A handwritten signature in cursive script that reads "Elaine Manlove".

Elaine Manlove  
State Election Commissioner

Attached: Statement of Organization

Cc: Governor John C. Carney  
Attorney General Matt Denn  
Erik Raser-Schramm, Chairman, Delaware Democratic Party  
Michael Harrington, Sr., Chairman, Delaware Republican Party  
David McCorquodale, Green Party  
Sean Goward, Libertarian Party

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M. OF ELECTIONS

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CANDIDATE COMMITTEE

POLITICAL ACTION COMMITTEE

POLITICAL COMMITTEE

3rd PARTY ADVERTISER

In order to register with the Campaign Finance Section of the Office of the State Election Commissioner, you must complete a Statement of Organization. If any information for your organization changes, you must complete an amended Statement of Organization and submit it to the Campaign Finance Section.

NEW

AMENDED

DATE OF ORIGINATION:

09/12/2018

### ORGANIZATIONAL DATA

FULL ORGANIZATION NAME

C-11

OTHER NAME:

PHYSICAL ADDRESS

724 Yorklyn Road, Suite 310

Hockessin

Delaware

19707

ADDRESS

CITY

STATE

ZIP

MAILING ADDRESS:

724 Yorklyn Road, Suite 310

Hockessin

Delaware

19707

ADDRESS

CITY

STATE

ZIP

CONTACT INFORMATION:

OFFICE PHONE

FAX NUMBER

patrick@allenstrategiesllc.com

EMAIL ADDRESS

WEB ADDRESS

**ORGANIZATIONAL DATA (Continued)**

NAME OF PARTY IF ENTIRE TICKET IS SUPPORTED:

DEMOCRATIC     REPUBLICAN     OTHER \_\_\_\_\_

SHORT STATEMENT OF PURPOSE :

The purpose of this committee is to support and elect Democratic candidates in the State of Delaware.

PARTY AFFILIATION :

DEMOCRATIC     REPUBLICAN     OTHER \_\_\_\_\_  
LIST FULL NAME OF PARTY

**OFFICER DATA**

NAME OF TREASURER : **Mr. Patrick Allen**

PHYSICAL HOME ADDRESS :

<b>724 Yorklyn Road, Suite 310</b>	<b>Hockessin</b>	<b>Delaware</b>	<b>19707</b>
ADDRESS	CITY	STATE	ZIP

MAILING ADDRESS :

<b>724 Yorklyn Road, Suite 310</b>	<b>Hockessin</b>	<b>Delaware</b>	<b>19707</b>
ADDRESS	CITY	STATE	ZIP

CONTACT INFORMATION :

<b>(302) 299-6422</b>	HOME PHONE
WORK PHONE	
CELL PHONE	FAX NUMBER
<b>patrick@allenstrategiesllc.com</b>	
EMAIL ADDRESS	

**OFFICER DATA(Continued)**

NAME OF ADDITIONAL OFFICER : **Ms. debra allen**

ROLE : **Administrator**

PHYSICAL HOME ADDRESS :

<b>4 BAR DR</b>	<b>NEWARK</b>	<b>Delaware</b>	<b>19702</b>
ADDRESS	CITY	STATE	ZIP

MAILING ADDRESS :

<b>4 BAR DR</b>	<b>NEWARK</b>	<b>Delaware</b>	<b>19702</b>
ADDRESS	CITY	STATE	ZIP

CONTACT INFORMATION :

WORK PHONE HOME PHONE

CELL PHONE FAX NUMBER

**debra.s.allen@hotmail.com**

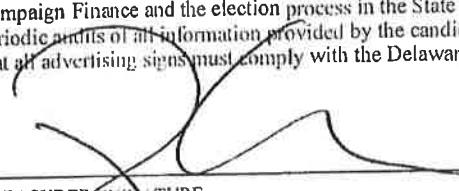
EMAIL ADDRESS

# Delaware elections

Campaign Finance Section  
Statement of Organization

## CERTIFICATION

I authorize that all information included in this Statement of Organization is accurate and correct. I agree to abide by all rules and regulations regarding Campaign Finance and the election process in the State of Delaware. I understand that the Office of the State Election Commissioner will perform periodic audits of all information provided by the candidate and treasurer listed on this report as well as other officers of my organization. I understand that all advertising signs must comply with the Delaware DOT Sign Law.



9-17-18

TREASURER SIGNATURE

DATE

STATE OF

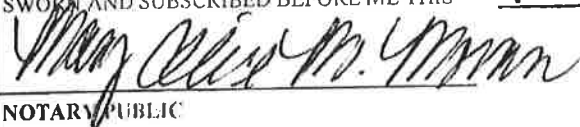
Delaware

COUNTY OF

New Castle

SWORN AND SUBSCRIBED BEFORE ME THIS

17<sup>th</sup> day of Sept. 2018



NOTARY PUBLIC

