

BEFORE THE FEDERAL ELECTION COMMISSION

CAMPAIGN LEGAL CENTER
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MARGARET CHRIST
1101 14th Street NW, Suite 400
Washington, DC 20005
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v.

MUR No. _____

ANTONE FOR CONGRESS
Dennis Melton, Treasurer
P.O. Box 582859
Minneapolis, MN 55458

COMPLAINT

1. This complaint is filed with the Federal Election Commission (“FEC” or “Commission”) pursuant to 52 U.S.C. § 30109(a)(1) and is based on information providing reason to believe that candidate Antone Melton-Meaux’s campaign committee, Antone for Congress (ID: C00729582), has violated the reporting requirements of the Federal Election Campaign Act (“FECA”), 52 U.S.C. § 30101, *et seq.*
2. Antone for Congress has disguised over 77 percent of its total spending by routing funds through three recently created LLCs. The candidate himself has publicly acknowledged that the LLCs are being used as conduits to disguise the identities of the campaign’s ultimate vendors, and additionally described a motive to conceal their identities. None of the three LLCs appears to have other clients, nor do they appear to have any existence outside of the campaign; instead, the facts indicate that the LLCs were created for the purpose of contracting with Antone for Congress. By failing to report payments to the campaign’s true

vendors and employees, Antone for Congress has violated federal law's transparency requirements and undermined the vital public information role that reporting is intended to serve.

3. The campaign's failure to itemize disbursements to its ultimate vendors means that the public is left in the dark about the entities working for Antone for Congress, the nature of their services, and the full amount they are paid. Such secrecy undermines enforcement of other FECA provisions, such as the ban on campaigns converting funds to personal use and limitations on coordination between campaigns and outside groups via common vendors. This secrecy scheme deprives contributors of an opportunity to monitor the campaign's stewardship of funds. And it denies voters their informational interest in knowing "where political campaign money comes from and how it is spent," *Buckley v. Valeo*, 424 U.S. 1, 66 (1976), so that they may "make informed decisions," *see Citizens United v. FEC*, 558 U.S. 310, 370 (2010).
4. "If the Commission, upon receiving a complaint . . . has reason to believe that a person has committed, or is about to commit, a violation of [FECA] . . . [t]he Commission *shall* make an investigation of such alleged violation. . . ." 52 U.S.C. § 30109(a)(2) (emphasis added); *see also* 11 C.F.R. § 111.4(a).

FACTS

5. Antone for Congress is the authorized campaign committee of Antone Melton-Meaux, a candidate for the Democratic-Farmer-Labor Party nomination in Minnesota's Fifth Congressional District.¹

¹ Antone for Congress., Statement of Organization, FEC Form 1 at 1, 2 (filed Dec. 3, 2019), <https://docquery.fec.gov/pdf/636/201912039166154636/201912039166154636.pdf>.

6. Lake Point Consulting LLC has been paid \$102,500 by Antone for Congress for “strategic consulting” services.² The entity was formed in Delaware by a generic registered agent on December 2, 2019,³ one day before Antone for Congress filed its statement of organization.⁴
7. North Superior Consulting LLC has been paid \$17,500 by Antone for Congress for “strategic consulting” services.⁵ The entity was formed in Delaware on November 4, 2019 by the same generic registered agent that created Lake Point Consulting.⁶
8. On July 17, 2020, *MinnPost* reported that Antone for Congress “has paid almost \$100,000 to two newly established Delaware corporations for ‘strategic consulting,’ but has refused to disclose what specifically the firms are doing for the campaign or who is involved in the firms.”⁷ The campaign said in a statement that “[b]oth Lake Point Consulting LLC and North Superior Consulting LLC are communications and strategy consulting firms that work largely outside of politics, with very limited political experience. Both organizations aren’t affiliated with the [Minnesota Democratic-Farmer-Labor Party], and are people that Antone knows and who were referred to his campaign by supporters.”⁸

² Antone for Congress, 2020 Pre-Primary Report, FEC Form 3 at 287 (filed July 28, 2020), <https://docquery.fec.gov/pdf/504/202007309261195504/202007309261195504.pdf>; Antone for Congress, 2020 July Quarterly Report, FEC Form 3 at 1912-13 (filed July 13, 2020), <https://docquery.fec.gov/pdf/648/202007159249689648/202007159249689648.pdf>; Antone for Congress, 2020 April Quarterly Report, FEC Form 3 at 181-82 (filed Apr. 14, 2020), <https://docquery.fec.gov/pdf/450/202004159216846450/202004159216846450.pdf>; Antone for Congress, 2019 Year-End Report, FEC Form 3 at 81 (filed Jan. 30, 2020), <https://docquery.fec.gov/pdf/382/202001319185081382/202001319185081382.pdf>.

³ Lake Point Consulting LLC, Certificate of Formation, State of Delaware Secretary of State (Dec. 2, 2019), available at https://www.minnpost.com/wp-content/uploads/2020/07/235531262_351420_033521.pdf.

⁴ Antone for Congress, Statement of Organization, *supra* note 1.

⁵ Antone for Congress, 2020 July Quarterly Report, *supra* note 2, at 1919; Antone for Congress, 2020 April Quarterly Report, *supra* note 2, at 187; Antone for Congress, 2019 Year-End Report, *supra* note 2, at 84.

⁶ North Superior Consulting LLC, Certificate of Formation, State of Delaware Secretary of State (Nov. 4, 2019), available at https://www.minnpost.com/wp-content/uploads/2020/07/234633512_361420_033638.pdf.

⁷ Gabe Schneider, *Antone Melton-Meaux’s campaign paid almost \$100,000 to two consulting companies — but won’t say who is involved or what work they do*, MINNPOST (July 17, 2020), <https://www.minnpost.com/national/2020/07/antone-melton-meauxs-campaign-paid-almost-100000-to-two-consulting-companies-but-wont-say-who-is-involved-or-what-work-they-do/>.

⁸ *Id.*

9. On reports filed with the Commission, Antone for Congress additionally reported approximately \$2,570,508 in payments to “WCPA,” for services described as “TV/digital ad buy,” “TV ad buy and production,” “digital advertising,” “media buy,” “direct mail,” and “retainer.”⁹ The campaign reported paying WCPA at the address P.O. Box 87583, Chicago, IL 60680, but there is no public record of an entity called “WCPA” at that address.¹⁰ However, an entity called “WPCA LLC” was created in Delaware on May 29, 2020 by a generic registered agent,¹¹ approximately two weeks before Antone for Congress’s first payments to “WCPA” on June 12, 2020.¹² No other federal committees have disclosed payments to either “WCPA” or “WPCA.”¹³
10. Antone for Congress’s broadcast advertisements have been placed by Canal Partners Media, according to records on file with the Federal Communications Commission (“FCC”); neither WCPA nor WPCA appears to have placed any of the campaign’s broadcast advertisements.¹⁴ Antone for Congress has not reported any disbursements to Canal Partners Media on its reports filed with the FEC.¹⁵
11. To date, the \$2,690,508 that Antone for Congress has paid to these three LLCs constitutes over 77 percent of the campaign’s total spending.¹⁶ No other federal committees have

⁹ Antone for Congress, 2020 July Quarterly Report, *supra* note 2, at 1922-23; Antone for Congress, 2020 Pre-Primary Report, *supra* note 2, at 297-99.

¹⁰ See, e.g., Andrew Perez, *Ilhan Omar’s Challenger Is Routing Cash Through Mystery Firms*, TMI (Jul. 21, 2020), <https://sirota.substack.com/p/ilhan-omars-challenger-is-routing>.

¹¹ See *Entity Details: WPCA LLC*, DELAWARE DIVISION OF CORPORATIONS, available at <https://www.documentcloud.org/documents/6998817-WPCA-LLC-DE.html>.

¹² Antone for Congress, 2020 July Quarterly Report, *supra* note 2, at 1922-23.

¹³ All Committees, Disbursements to “WCPA” or “WPCA,” 2019-20, FEC.GOV, https://www.fec.gov/data/disbursements/?data_type=processed&recipient_name=WCPA&recipient_name=WPCA&two_year_transaction_period=2020 (last visited Aug. 6, 2020).

¹⁴ See Public Inspection Files, FCC, <https://publicfiles.fcc.gov/search> (last visited Aug. 5, 2020).

¹⁵ Antone for Congress, Disbursements to Canal Partners, 2019-20, FEC.GOV, https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00729582&recipient_name=canal+partners&two_year_transaction_period=2020 (last visited Aug. 6, 2020).

¹⁶ Antone for Congress, 2020 Pre-Primary Report, *supra* note 2, at 4 (showing \$3,457,465 in total disbursements to date).

disclosed payments to Lake Point Consulting LLC,¹⁷ North Superior Consulting LLC,¹⁸ or WCPA or WPCA LLC.¹⁹ None of the three LLCs appears to have a website or social media presence.

12. On July 29, 2020, the *Washington Post* reported that Melton-Meaux had been critiqued “for not disclosing all of the contractors he has tapped for his campaign. As of mid-July, the challenger had paid nearly \$1.2 million to three Delaware-based LLCs, which have little to no record of work for other candidates”:

Asked if he would reveal the identities of the contractors, Melton-Meaux said that some “have to remain within an NDA” because of the Democratic Congressional Campaign Committee’s “blacklist” of contractors who work to defeat incumbents, a policy [House Speaker Nancy] Pelosi supports.

“You have organizations and consulting firms trying to preserve their professional careers and their livelihoods, because of the onerous decision by the DCCC, frankly, that I think is trying to chill the democratic process,” Melton-Meaux said.²⁰

13. During an August 5, 2020 press conference, Melton-Meaux addressed questions about his campaign routing its spending through the three LLCs, stating:

This is really the result of the Democratic Congressional Campaign Committee and an edict they put out in the fall of last year that they would blacklist any vendor that worked for someone like me—someone that’s running against an incumbent—they’re basically gonna put these folks out of business. And so now, these individuals and organizations, have to protect themselves. And they’ve done it in a legal way.²¹

¹⁷ All Committees, Disbursements to “Lake Point,” 2019-20, FEC.GOV, https://www.fec.gov/data/disbursements/?data_type=processed&recipient_name=lake+point (last visited Aug. 6, 2020).

¹⁸ All Committees, Disbursements to “North Superior,” 2019-20, FEC.GOV, https://www.fec.gov/data/disbursements/?data_type=processed&recipient_name=north+superior&two_year_transaction_period=2020 (last visited Aug. 6, 2020).

¹⁹ All Committees, Disbursements to “WCPA” or “WPCA,” 2019-20, FEC.GOV, https://www.fec.gov/data/disbursements/?data_type=processed&recipient_name=WCPA&recipient_name=WPCA&two_year_transaction_period=2020 (last visited Aug. 6, 2020).

²⁰ Rachael Bade & David Weigel, *Pelosi Endorses Rep. Tlaib in Primary Fight, Moves to Help Members of ‘the Squad,’* WASH. POST (July 29, 2020), https://www.washingtonpost.com/powerpost/pelosi-endorses-rep-tlaib-in-primary-fight-moves-to-help-members-of-the-squad/2020/07/29/028b5692-d1c6-11ea-9038-af089b63ac21_story.html.

²¹ Antone for Congress, Press Conference, FACEBOOK at 25:52-26:16 (Aug. 5, 2020), https://www.facebook.com/watch/live/?v=3135153886581134&ref=watch_permalink.

SUMMARY OF THE LAW

14. FECA requires that each treasurer of a political committee file reports of receipts and disbursements with the Commission. 52 U.S.C. § 30104(a)(1). Such reports must disclose the name and address of each person to whom operating expenditures or other disbursements in excess of \$200 are made, “together with the date, amount, and purpose” of those operating expenditures or other disbursements. 52 U.S.C. § 30104(b)(5)(A), (b)(6)(B)(v).
15. Commission regulations similarly require that authorized political committees disclose the date, amount, and purpose of expenditures and disbursements over \$200. 11 C.F.R. § 104.3(b)(4)(i).
16. Public reporting requirements like these help inform the public about “where political campaign money comes from and how it is spent.” *Buckley*, 424 U.S. at 66. Such reporting serves important informational interests; as the Court has explained, “transparency enables the electorate to make informed decisions.” *Citizens United*, 558 U.S. at 370.
17. In Advisory Opinion 1983-25 (Mondale), the Commission determined that a committee need not separately itemize a media firm vendor’s “payments to other persons, which are made to purchase services or products used in performance of [the vendor’s] contract with the Committee.” Advisory Opinion 1983-25 (Mondale) at 2. This determination rested on the contract between the committee and vendor being the product of “arm’s-length negotiations”: the Commission found it significant that the vendor “has a legal existence that is separate and distinct from the operations of the Committee, and its principals do not hold any staff position with the Committee,” and that the vendor “will not be required to devote its ‘full efforts’ to the contract with the Committee” and will have other clients. *Id.* at 3.

18. The Commission has distinguished Advisory Opinion 1983-25 in subsequent enforcement matters, finding that a committee must itemize payments to a “sub-vendor” when the immediate vendor receiving the itemized disbursement does not have an “arm’s-length” relationship with the committee, and/or when the immediate vendor is merely acting as a “conduit” for disbursements to sub-vendors. *See, e.g.*, MUR 3847 (Stockman); MUR 4872 (Jenkins); MUR 6724 (Bachmann for President). Under these circumstances, failing to itemize disbursements to the ultimate payee violates 52 U.S.C. § 30104(b)(5).
19. In MUR 3847 (Stockman), the Commission found probable cause to believe that Friends of Steve Stockman violated 52 U.S.C. § 30104(b)(5) by failing to itemize disbursements to sub-vendors paid through a vendor, Political Won Stop (“PWS”). PWS was started by a Stockman campaign official and payments from the Stockman committee to PWS were “used to pay, inter alia, its principals, employees, and third-party vendors to carry out services for the campaign.” General Counsel’s Brief at 32-33, MUR 3847 (Stockman). In determining that the Stockman committee was required to itemize ultimate payees paid through PWS, the Commission found that the committee and PWS did not have “sufficiently separate and distinct identities to warrant the less detailed type of reporting permitted by the Commission in Advisory Opinion 1983-25.” First General Counsel’s Report at 4, MUR 3847 (Stockman). The Commission concluded that the Stockman committee and PWS were not “conducting their professional relationship at arm’s length,” since PWS was devoted largely to the Stockman campaign, worked out of that campaign's headquarters, and used its facilities, and since one of PWS’s two principals held a position with the campaign. *Id.* at 5; *see also* General Counsel’s Brief at 34-35, MUR 3847 (Stockman). The Commission concluded that, “[b]ecause the relationship between the committee and Political Won Stop does not appear to

be at arm's length, then the committee may have been required to itemize the expenditures made by Political Won Stop to others." First General Counsel's Report at 5, MUR 3847 (Stockman).

20. In MUR 4872 (Jenkins), the Commission found reason to believe that Jenkins for Senate 1996 and Louis E. "Woody" Jenkins knowingly and willfully violated 52 U.S.C. § 30104(b)(5)(A) and entered into a conciliation agreement. There, Jenkins's campaign had hired a vendor called Impact Mail to perform computerized phone bank services, based on the recommendation of white supremacist David Duke. Conciliation Agreement at 2, MUR 4872 (Jenkins). When the campaign discovered that Duke's name appeared on the caller ID for calls placed by Impact Mail, the campaign sought to terminate its relationship with the firm, yet was unable to do so under the terms of the contract. *Id.* at 2-3. To avoid public association with Duke, Jenkins "directed that Impact Mail be paid through Courtney Communications, the campaign's media firm" so as to avoid listing Impact Mail on disclosure reports. *Id.* at 3. The Jenkins campaign issued three \$27,500 checks to Courtney Communications, and Courtney Communications, "in turn, made out three checks in the same amount to Impact Mail." *Id.* Although Courtney Communications was a vendor that provided media services for the committee during the period in question, the Commission concluded that "Impact Mail was not an 'ultimate vendor or sub-vendor of Courtney Communications," because Courtney Communications "had no involvement whatsoever with the services provided by Impact Mail." *Id.* at 3-4. Indeed, the Jenkins campaign, not Courtney Communications, had hired and "contracted directly with Impact Mail." *Id.* Based on these facts, the Commission found that "Courtney's only role in this matter was to serve

as a conduit for payment to Impact Mail so as to conceal the transaction with Impact Mail.”
Id.

21. In MUR 6724 (Bachmann for President), the Commission found reason to believe that Bachmann for President violated 52 U.S.C. § 30104(b)(5) by failing to properly disclose disbursements to Iowa State Senator Kent Sorenson; Bachmann for President ultimately signed a conciliation agreement and paid a financial penalty. The Bachmann campaign’s disbursements to Sorenson were made through C&M, a political consulting firm owned by the Bachmann campaign’s National Political Director, Guy Short. To avoid detection of compensation paid to Sorenson, which may have violated the Iowa Senate Code of Ethics, the campaign—as well as the candidate’s leadership PAC—paid additional funds to C&M, and “C&M would then pass the additional amount to Sorenson” through a consulting firm owned by Sorenson (Grassroots Strategy, Inc.). First General Counsel’s Report at 7, MUR 6724 (Bachmann for President). “As in MURs 4872 (Jenkins) and 3847 (Stockman), here the Committee used C&M merely ‘to serve as a conduit for payment’—thereby failing to report the true, intended recipient of the disbursements.” *Id.* at 14 (citing Conciliation Agreement at 4, MUR 4872 (Jenkins)). Facts cited in support of the reason to believe finding included that the Bachmann campaign “made the decision to hire Sorenson and negotiated the terms of his compensation,” and that it did “not appear that C&M exercised any independent control over the funds it received” from the Bachmann campaign that “were ‘earmarked’ for Sorenson.” *Id.* “By contrast, available evidence indicates that Sorenson reported to and took direction from the Committee.” Factual & Legal Analysis at 10, MUR 6724 (Bachmann for President). The Commission also noted that, as in MUR 3847 (Stockman), “C&M’s only principal (Short) held an official position with the Committee and appears to have worked out of

campaign headquarters, used its facilities, and devoted himself largely to the Bachmann campaign, casting doubt on the arm's length nature of the relationship.” First General Counsel’s Report at 14, MUR 6724 (Bachmann for President).

22. The Commission rejected Bachmann for President’s argument that AO 1983-25 (Mondale) relieved it of any sub-vendor reporting obligations because the facts were “materially distinguishable” from those in the Mondale matter. *Id.* at 15. First, the Office of General Counsel (“OGC”) concluded that C&M “does not meet the definition of a legitimate ‘vendor’ as set forth in AO 1983-25: (1) C&M’s principal, Short, held a staff position on the Bachmann committee, which “calls into question whether the contract was negotiated at arm’s length”; (2) “it appears that C&M devoted its ‘full efforts’ solely to the Committee”; (3) C&M’s “only known client” was the candidate’s leadership PAC; and (4) the Bachmann committee had an interest in C&M’s contract with the leadership PAC. *Id.* at 15-16. OGC additionally noted that the Bachmann campaign may have “had a motive to conceal the true recipient of its payments.” *Id.* at 16. Second, OGC determined that *even if* C&M were a “vendor” under the Mondale factors, “there is no evidence that Sorenson’s services . . . were ‘used in the performance of’ C&M’s contract with the Committee.” *Id.*; *see also* Factual & Legal Analysis at 10-11, MUR 6724 (Bachmann for President).

CAUSE OF ACTION

COUNT I:

ANTONE FOR CONGRESS VIOLATED FECA’S REPORTING REQUIREMENTS BY LAUNDERING UNITEMIZED DISBURSEMENTS THROUGH LLCs

23. FECA and Commission regulations require that authorized committees itemize each disbursement in excess of \$200, together with the “purpose” of the disbursement. 52 U.S.C. § 30104(b)(5), (b)(6)(B)(v); 11 C.F.R. § 104.3(b)(4)(i).

24. The Commission has found that a campaign must itemize disbursements to the ultimate recipients of its spending when the vendor appearing on the FEC report is merely acting as a “conduit” for disbursements to the campaign’s ultimate payees, and/or where the vendor receiving the reported disbursement does not have an “arm’s-length” relationship with the committee. In such instances, failing to itemize disbursements to the ultimate payee violates 52 U.S.C. § 30104(b)(5); this is particularly the case when a campaign has “a motive to conceal the true recipient of its payments.” First General Counsel’s Report at 16, MUR 6724 (Bachmann for President).
25. Melton-Meaux has publicly acknowledged that the three LLCs appearing on Antone for Congress’s FEC reports operate to disguise the identities of the ultimate recipients of his campaign’s payments; Melton-Meaux and his campaign admitted to the *Washington Post* and *MinnPost* that they knew the identities of the individuals and entities being paid via the LLCs, but stated that the names of those recipients would not be publicly disclosed.²² Melton-Meaux additionally described a *motive* to conceal those recipients, claiming that their identities were being hidden because the DCCC would “blacklist” those contractors if their names were made publicly available, as FECA requires.²³
26. The candidate’s and campaign’s public statements indicate that Antone for Congress is using North Superior Consulting LLC, Lake Point Consulting LLC, and WCPA (or WPCA LLC) “merely ‘to serve as a conduit for payment’—thereby failing to report the true, intended recipient[s] of the disbursements.” First General Counsel’s Report at 14, MUR 6724 (Bachmann for President) (citing Conciliation Agreement at 4, MUR 4872 (Jenkins)); *see also* General Counsel’s Brief at 32-33, MUR 3847 (Stockman) (finding probable cause to

²² Bade & Weigel, *supra* note 20; Schneider, *supra* note 7.

²³ Bade & Weigel, *supra* note 20; Antone for Congress, Press Conference, *supra* note 21.

believe when a campaign used a vendor as a conduit “to pay . . . its employees . . . to carry out services for the campaign”). Moreover, it appears that Antone for Congress “made the decision to hire [the ultimate payees] and negotiated the terms of [their] compensation.” First General Counsel’s Report at 14, MUR 6724 (Bachmann for President); *see also* Conciliation Agreement at 1, MUR 4872 (Jenkins) (finding reason to believe when the campaign, rather than the itemized vendor, had hired and contracted with the ultimate payee). For example, Antone for Congress admitted to *MinnPost* that the individuals who are paid via Lake Point Consulting LLC and North Superior Consulting LLC “are people that Antone knows and who were referred to his campaign by supporters.”²⁴

27. Additionally, the three LLCs do not have an “arm’s-length” relationship with Antone for Congress: the firms were created for the purpose of contracting with the campaign and have no apparent existence or clients outside of the campaign. Melton-Meaux appears to have been considering a run for office since at least October 15, 2019, when the domain AntoneforCongress.com was registered;²⁵ North Superior Consulting LLC was created on November 4, 2019,²⁶ Lake Point Consulting LLC was created on December 2, 2019,²⁷ and Antone for Congress filed its statement of organization on December 3, 2019.²⁸ The “WCPA” listed on the committee’s FEC reports does not have a discernible legal existence, but WPCA LLC was created on May 29, 2020, just weeks before Antone for Congress’s first payment to “WCPA” on June 12, 2020.²⁹ None of the three entities appears to have a website or social media presence, and no other federal committee has reported disbursements to the

²⁴ Schneider, *supra* note 7.

²⁵ WhoIs Search Results for “AntoneforCongress.com,” GODADDY, <https://bit.ly/33vsHNY> (last visited Aug. 5, 2020).

²⁶ See sources cited *supra* ¶ 7.

²⁷ See sources cited *supra* ¶ 6.

²⁸ Antone for Congress, Statement of Organization, *supra* note 1.

²⁹ See sources cited *supra* ¶ 9.

entities.³⁰ As in the Stockman and Bachmann matters, the three LLCs are “devoted . . . largely to the . . . campaign,” First General Counsel’s Report at 15-16, MUR 6724 (Bachmann for President) (citing Conciliation Agreement at 6-7, MUR 3847 (Stockman)), and the “only known client” of each is Antone for Congress, First General Counsel’s Report at 15-16, MUR 6724 (Bachmann for President).

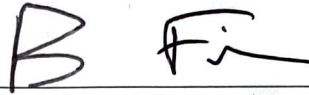
28. Taken together, the evidence indicates that North Superior Consulting LLC, Lake Point Consulting LLC, and WCPA (or WPCA LLC) are acting as conduits to conceal the ultimate recipients of Antone for Congress’s spending, and the candidate and the committee have acknowledged both an intention to conceal and a motive for concealing the identities of those recipients. Therefore, there is reason to believe that Antone for Congress filed false reports by inaccurately reporting disbursements to North Superior Consulting LLC, Lake Point Consulting LLC, and WCPA, and failing to itemize payments to ultimate payees in violation of FECA’s reporting requirements at 52 U.S.C. § 30104(b)(5), (b)(6)(B)(v).

PRAYER FOR RELIEF

29. Wherefore, the Commission should find reason to believe that Antone for Congress has violated 52 U.S.C. § 30101, *et seq.*, and conduct an immediate investigation under 52 U.S.C. § 30109(a)(2).
30. Further, the Commission should seek appropriate sanctions for any and all violations, including civil penalties sufficient to deter future violations and an injunction prohibiting the respondents from any and all violations in the future, and should seek such additional remedies as are necessary and appropriate to ensure compliance with the FECA.

³⁰ See sources cited *supra* ¶ 11.

Respectfully submitted,



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August 7, 2020

VERIFICATION

The complainants listed below hereby verify that the statements made in the attached Complaint are, upon their information and belief, true.

Sworn pursuant to 18 U.S.C. § 1001.

For Complainant Margaret Christ



Margaret Christ

Sworn to and subscribed before me this 07 day of August 2020.



Notary Public

For Complainant Campaign Legal Center

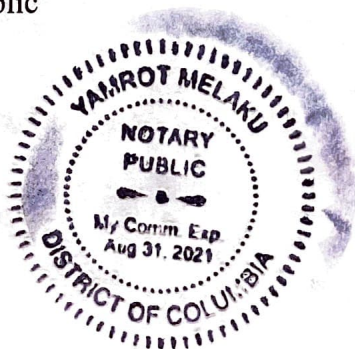


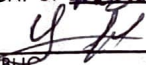
Brendan M. Fischer

Sworn to and subscribed before me this 07 day of August 2020.



Notary Public



DISTRICT OF COLUMBIA: SS
SUBSCRIBED AND SWORN TO BEFORE ME
THIS 07 DAY OF AUG. 2020.

NOTARY PUBLIC
My Commission Expires 08-31-2021