

BEFORE THE FEDERAL ELECTION COMMISSION

CAMPAIGN LEGAL CENTER
1101 14th Street NW, Suite 400
Washington, DC 20005

ROGER G. WIEAND
1101 14th Street NW, Suite 400
Washington, DC 20005

v. MUR No. _____

LIAM MADDEN and LAUREN MADDEN
30 Meeting House Rd.
Bellows Falls, VT 05101

OONA MADDEN
3 Gove St. House Rd.
Bellows Falls, VT 05101

DARRY MADDEN
33 Lillian St.
Greenfield, MA 01301

LIAM MADDEN FOR CONGRESS
COMMITTEE and LIAM MADDEN in
his official capacity as treasurer
PO Box 244
Bellows Falls, VT 05101

UNKNOWN RESPONDENT
who made contributions to Liam Madden for
Congress Committee in the names of Liam
Madden, Lauren Madden, June Madden,
Oona Madden, and Darry Madden

COMPLAINT

1. Liam Madden, a 2022 candidate for the U.S. House of Representatives in Vermont, orchestrated an illegal straw donor scheme, in which — according to Madden’s own statements — he drew funds from his wife’s business account to contribute over \$25,000 in the names of his family members to his authorized campaign committee, the Liam

Madden for Congress Committee (the “Committee”). During a publicly aired radio interview, Madden acknowledged that he set up this straw donor contribution scheme, which he described as a “legal loophole,” to meet a fundraising threshold to participate in a candidate debate. During the interview, Madden also acknowledged that the Committee partially reimbursed him for the illegal contributions in the guise of candidate salary payments. This is consistent with the campaign’s disclosure reports, which show \$13,500 in payments for “staff” disbursed to Liam Madden, who also served as the Committee’s treasurer.

2. As set forth in this complaint, there is reason to believe that Liam, Lauren, Darry, Oona, and June Madden were not the true sources of \$25,600 in contributions made to the Committee on May 1 and May 10, 2022, and that the true contributor was an unidentified business owned or operated by Lauren Madden, which may be “Lala Earth.” As such, there is reason to believe this unidentified business violated 52 U.S.C. § 30122 by making contributions in the name of another; that Liam, Lauren, Darry, and Oona Madden violated the same provision by knowingly permitting their names to be used to effect contributions in the name of another;¹ and that the Liam Madden for Congress Committee and Liam Madden in his official capacity as treasurer (“the Committee”) violated the same provision by knowingly accepting contributions in the name of another.
3. The available information also supports finding reason to believe that the unidentified source of the contributions, which may be Lala Earth, violated either 52 U.S.C. § 30116(a)(1)(A) by making contributions in excess of the prevailing limit of \$2,900 per

¹ While the Committee reported receiving a contribution in the name of June Madden, June was reportedly three years old at the time and therefore did not “knowingly” permit his name to be used to facilitate a contribution in the name of another. *See* 52 U.S.C. § 30122.

election, or 52 U.S.C. § 30118(a) by making prohibited corporate contributions, and that the Committee violated 52 U.S.C. § 30116(f) or 30118(a) by knowingly accepting these excessive or prohibited corporate contributions.

4. In addition, the available information supports finding reason to believe that the Committee knowingly filed false disclosure reports indicating that it disbursed \$13,500 in candidate salary payments to Liam Madden, when those disbursements were actually reimbursements for the illegal straw donations from Lauren Madden’s business.
5. This complaint is filed pursuant to 52 U.S.C. § 30109(a)(1) and is based on information and belief that respondents violated the Federal Election Campaign Act (“FECA”), 52 U.S.C. § 30101, *et seq.* “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.”²

FACTUAL BACKGROUND

6. Liam Madden was a candidate for the U.S. House of Representatives in Vermont’s 1st Congressional district. His principal campaign committee was the Liam Madden for Congress Committee, for which he also served as treasurer.³
7. The Committee reported receiving \$5,800 from Liam Madden, \$5,800 from Lauren Madden, \$5,800 from Oona Madden, and \$5,300 from June Madden, on May 1, 2022. It also reported receiving \$2,900 from Darry Madden on May 10, 2022.⁴ These contributions totaled \$25,600.

² 52 U.S.C. § 30109(a)(2) (emphasis added); *see also* 11 C.F.R. § 111.4(a).

³ Liam Madden for Congress Committee, Statement of Org. at 2 (Sept. 13, 2022).

⁴ Rebirth Democracy Committee, July 2022 Quarterly Report at 6, 7, 11 (Jul. 14, 2022). Madden’s principal campaign committee was originally registered as the “Rebirth Democracy Committee” before being renamed the “Liam Madden for Congress Committee” per the Federal Election Commission’s requirements.

8. The Committee raised \$47,659.85 during the 2022 election cycle,⁵ such that the \$25,600 in contributions made in the names of Liam Madden and his family members constituted the majority (53%) of the Committee's funding.
9. On October 27, 2022, Liam Madden appeared on The Morning Drive with Marcus & Kurt, a radio show on WVMT, a radio station based in Burlington, Vermont. During the broadcast, he discussed the above contributions:

HOST: I want to give you a chance to respond to a couple of, uh, criticisms that have been, we have heard, either from a candidate or someone else, one being that on your financial report, your uhm, young son is listed as contributor.

MADDEN: Yeah, um, so, in order to qualify for a couple debates in the primary, there was a, uh, minimum bar of fundraising you had to do, which I thought was BS. And so *the legal loophole around that was to basically just drain all the funds out of my wife's business operating account, and distribute that to members of my family to donate to my campaign. And since we can't actually afford to donate \$25,000, um, we had to basically pay that back by quote-unquote paying the candidate*, which is also legal. So I basically just made some legal loopholes happen to be resourceful to actually get into the debates which helped me win the primary.

HOST: So you had to meet a \$25,000 threshold –

MADDEN: For – in – it had to do \$35,000, but I had actually raised ten at that point.

HOST: And that, uh, explain that again, that, uh – that threshold allowed you to be in the debates?

MADDEN: There was – there were several debates where there was gatekeepers, and they said we're only gonna have these top-tier candidates that can raise X amount of money.

HOST: And this was during the primary.

⁵ Liam Madden for Congress Committee, Raising, <https://www.fec.gov/data/committee/C00812008/?tab=raising> (last visited Dec. 15, 2022).

MADDEN: Yeah, so I was like fine, I'll y'know, show that I raised that amount of money legally, but, it's, y'know, *it's obviously just a paper donation*.

HOST: And you – you said you drained money out of your own bank account?

MADDEN: *My wife's business account had enough money to fund that as long as we paid it back pretty much immediately*, which is –

HOST: And the, you said there was a legal – and you've checked and this is legal?

MADDEN: Yes.

HOST: And what it was was, you, in that account, you put it under family members' names.

MADDEN: Well, we – *we took the money out of my wife's business account and then gave it to family members and then they donated to my campaign. And then, from there I need to get them that money back, so I had to pay the candidate*, which you have to do over the course of weeks, because you're only allowed to legally pay the candidate so much at a time.⁶

10. Madden further described the scheme in posts on his Twitter account, “Liam Madden Vermont Congressional Candidate” (@LiamAwakening). On October 28, 2022 — *i.e.*, the day after the radio interview — Madden posted in reply to an @VTGOP comment: “There is no need for this tweet. The business is a sole proprietorship[.] And is not incorporated. I am sure I’m within the bounds of the law. I am being outspent 100:1, my fundraising isn’t the story.”⁷

11. In another Tweet on October 28, 2022, Madden wrote:

I gave \$ to my son: legal. Asked him to support my campaign:
legal. My wife and I gave our own \$: legal. All within legal limits.
All so they'd let me debate. My wife's biz is sole proprietorship,

⁶ The Morning Drive with Marcus & Kurt (Oct. 27, 2022), <https://podcasts.apple.com/us/podcast/the-morning-drive/id1463676492?i=1000584125144> (emphases added) (“Radio Interview”).

⁷ Liam Madden Vermont Congressional Candidate (@LiamAwakening), Twitter (Oct. 28, 2022, 1:01 PM), <https://twitter.com/LiamAwakening/status/1586040498418057219> (screenshot attached as Exhibit A).

not Corp, meaning, it's our \$, not a corp. Meanwhile Balint gets \$1.7MM from lobby.⁸

12. On October 29, 2022, Madden posted a thread of multiple linked posts on his Twitter account:

It has come to my attention that I may have misinterpreted FEC rules and violated them inadvertently. . . In May, multiple primary debates had a requirement of \$35,000 in donations in order to participate. As a first time candidate with no party support or donor lists, I was nearly \$20k short of achieving this criteria. . . . So, among my family, me, my wife, and my son June, who is three years old, donated the maximum legal donations, which were filed appropriately on my report for that quarter. I was not aware that this is actually an issue, so long as my son consented, which he did. . . . *I actually could not afford to have all of those family donations to be donations, they were intended only to help me be able to debate, and they needed to be paid back. The only legal way I saw to recoup the donations which I couldn't afford, was to give 'the candidate' a salary according to the FEC specifications, until we could pay back our family account, which was all also documented on FEC filings, and is legal.*⁹

13. “Lala Earth” is a Vermont business that first registered on October 10, 2016, to Lauren Murphy at 30 Meeting House Road, Bellows Falls, VT 05101, which is the address associated with the contributions to the Committee from Lauren Madden, Liam Madden, and June Madden.¹⁰ A local news article on Liam Madden’s candidacy refers to his wife as “Lauren Murphy.”¹¹ On its website, Lala Earth states that “my name is Lauren and I am the face and maker behind Lala Earth.”¹²

⁸ Liam Madden Vermont Congressional Candidate (@LiamAwakening), Twitter (Oct. 28, 2022, 10:30 PM), <https://twitter.com/LiamAwakening/status/1586183547886268417> (screenshot attached as Exhibit B).

⁹ Liam Madden Vermont Congressional Candidate (@LiamAwakening), Twitter (Oct. 29, 2022, 11:44 PM), <https://twitter.com/LiamAwakening/status/1586564589210181632> (screenshot attached as Exhibit C) (emphasis added).

¹⁰ VT Sec’y of State, Corps. Div., Business Information (attached as Exhibit D.)

¹¹ Chelsea Edgar, *Veteran, Anti-War Activist and GOP Congressional Candidate Liam Madden Defies Labels*, <https://www.sevendaysvt.com/vermont/veteran-anti-war-activist-and-gop-congressional-candidate-liam-madden-defies-labels/Content?oid=36367557> (last visited Dec. 15, 2022).

¹² Lala Earth, About, <https://www.lalaeearth.com/pages/about> (last visited Dec. 15, 2022).

SUMMARY OF THE LAW

Contributions in the Name of Another

14. FECA provides that “[n]o person shall make a contribution in the name of another person or knowingly permit his name to be used to effect such a contribution and no person shall knowingly accept a contribution made by one person in the name of another person.”¹³
15. The Commission regulation implementing the statutory prohibition provides the following examples of contributions in the name of another:
 - a. “Giving money or anything of value, all or part of which was provided to the contributor by another person (the true contributor) without disclosing the source of money or the thing of value to the recipient candidate or committee at the time the contribution is made.”
 - b. “Making a contribution of money or anything of value and attributing as the source of the money or thing of value another person when in fact the contributor is the source.”¹⁴
16. The requirement that a contribution be made in the name of its true source promotes Congress’s objective of ensuring the complete and accurate disclosure by candidates and committees of the political contributions they receive,¹⁵ and ensures that the public and complainants are fully informed about the true sources of political contributions and expenditures. Such transparency also enables voters, including complainant Wieand, to

¹³ 52 U.S.C. § 30122.

¹⁴ 11 C.F.R. § 110.4(b)(2)(i)-(ii).

¹⁵ *United States v. O’Donnell*, 608 F.3d 546, 553 (9th Cir. 2010) (“[T]he congressional purpose behind [Section 30122]—to ensure the complete and accurate disclosure of the contributors who finance federal elections—is plain.”); *Mariani v. United States*, 212 F.3d 761, 775 (3d Cir. 2000) (rejecting constitutional challenge to section 30122 in light of the compelling governmental interest in disclosure).

have the information necessary to evaluate candidates for office, “make informed decisions[,] and give proper weight to different speakers and messages.”¹⁶

17. FECA and Commission regulations provide that a person who furnishes another with funds for the purpose of contributing to a candidate or committee “makes” the resulting contribution, whether funds are advanced to another person to make a contribution in that person’s name or promised as reimbursement of a solicited contribution.¹⁷ Moreover, the “key issue . . . is the source of the funds” and, therefore, the legal status of the funds when conveyed from a conduit to the ultimate recipient is “irrelevant to a determination of who ‘made’ the contribution for the purposes of [Section 30122].”¹⁸
18. Straw donor contributions like those alleged here are serious violations of federal campaign finance law that have led to criminal indictments and convictions in recent years.¹⁹ As explained in one such indictment, the straw donor ban works in tandem with other campaign finance laws to protect the integrity of our electoral system and to ensure that all candidates, campaign committees, federal regulators, and the public are informed of the true sources of money spent to influence federal elections.²⁰

¹⁶ *Citizens United v. FEC*, 558 U.S. 310, 369-71 (2010).

¹⁷ See *United States v. Boender*, 649 F.3d 650, 660 (7th Cir. 2011) (holding that to determine who made a contribution “we consider the giver to be the source of the gift, not any intermediary who simply conveys the gift from the donor to the donee”); *O’Donnell*, 608 F.3d at 550, 555.

¹⁸ *United States v. Whittemore*, 776 F.3d 1074, 1080 (9th Cir. 2015) (holding that defendant’s “unconditional gifts” to relatives and employees, along with the suggestion they contribute the funds to a specific political committee, violated Section 30122 because the source of the funds remained the individual who provided them to the putative contributors).

¹⁹ See Colin Moynihan, *Lev Parnas, Ex-Giuliani Ally, Is Convicted of Campaign Finance Charges*, N.Y. Times (Oct. 22, 2021), <https://www.nytimes.com/2021/10/22/nyregion/lev-parnas-guilty-giuliani.html>; Dep’t of Justice, *Lev Parnas and Igor Fruman Charged with Conspiring to Violate Straw and Foreign Donor Bans* (Oct. 10, 2019), <https://www.justice.gov/usao-sdny/pr/lev-parnas-and-igor-fruman-charged-conspiring-violate-straw-and-foreign-donor-bans>; Dep’t of Justice, *Entertainer/Businessman and Malaysian Financier Indicted for Conspiring to Make and Conceal Foreign and Conduit Contributions During 2012 U.S. Presidential Election* (May 10, 2019), <https://www.justice.gov/opa/pr/entertainerbusinessman-and-malaysian-financier-indicted-conspiring-make-and-conceal-foreign>.

²⁰ Grand Jury Indictment, *United States v. Lev Parnas, et al.*, Cr. No. 19-725 (S.D.N.Y. Oct. 10, 2019), <https://www.justice.gov/usao-sdny/press-release/file/1208281/download>.

19. Even for contributions that would otherwise be legal — *i.e.*, contributions that would not be prohibited or excessive, if made in the true contributor’s own name — the prohibition of contributions in the name of another serves FECA’s core transparency purposes by ensuring that voters have access to complete and accurate information regarding the sources of electoral contributions.

Excessive and/or Prohibited Corporate Contributions

20. FECA prohibits any “person” from making aggregate contributions in excess of a specified amount, currently \$2,900 per election, to any candidate and his or her authorized campaign committee.²¹ FECA further prohibits all candidates and political committees from knowingly accepting any contributions in violation of the relevant contribution limits.²²
21. Moreover, FECA prohibits corporations from making contributions to candidates and their authorized campaign committees, and prohibits candidates and their authorized campaign committees from knowingly accepting or receiving any such prohibited corporate contributions.²³

Disbursement Reporting

22. FECA mandates that all political committees, including a candidate’s authorized campaign committee, must file periodic disclosure reports with the Commission that disclose, among other things, the total disbursements made by the committee, and, in addition, the name and address of any person receiving disbursements aggregating in excess of \$200 in an election cycle.²⁴

²¹ 52 U.S.C. § 30116(a)(1)(A).

²² *Id.* § 30116(f).

²³ *Id.* § 30118(a); *see* 11 C.F.R. § 114.2(b), (d).

²⁴ 52 U.S.C. § 30104(a), (b)(4)-(5).

23. Under Commission regulations, for itemized disbursements, authorized campaign committees must provide the “date, amount and purpose of each expenditure,” and the “purpose” must include a “brief statement or description of why the disbursement was made.”²⁵

CAUSE OF ACTION

COUNT I

LIAM MADDEN, LAUREN MADDEN, OONA MADDEN, DARRY MADDEN, THE LIAM MADDEN FOR CONGRESS COMMITTEE, AND AN UNKNOWN RESPONDENT VIOLATED 52 U.S.C. § 30122

24. The available information supports finding reason to believe that Liam Madden, Lauren Madden, June Madden, Oona Madden, and Darry Madden were not the true source of \$25,600 contributed in their names to the Committee. Indeed, the available information indicates that they served as straw donors for these contributions, merely transmitting the funds of the true contributor, Lauren Madden’s unidentified business, thus concealing the true contributor’s identity from public disclosure — a scheme that is explicitly prohibited under FECA.
25. In an October 27, 2022, radio interview, Liam Madden publicly and explicitly acknowledged that the funds contributed to his campaign in his name and the names of his family members were not, in fact, from those individuals, but were “funds out of my wife’s business operating account” that were “distribute[d] . . . to members of my family to donate to my campaign.” Madden admitted that he and his family “can’t actually afford to donate \$25,000” but that his “wife’s business account had enough money to fund that as long as we paid it back pretty much immediately.” At the end of the radio

²⁵ 11 C.F.R. § 104.3(b)(4)(i).

interview, Madden stated again: “[W]e took the money out of my wife’s business account and then gave it to family members and then they donated to my campaign.”²⁶ This is the textbook definition of a straw donor scheme.

26. Liam Madden’s on-air statements are consistent with the disclosure reports filed by the Committee, which show that the Committee received a total of \$25,600 contributed by Liam, Lauren, June, Oona, and Darry Madden on May 1, 2022, and May 10, 2022.²⁷
27. Liam Madden’s online posts on Twitter further support the conclusion that these contributions were part of an illegal straw donor scheme. Indeed, on October 29, 2022, Liam Madden posted that “among my family, me, my wife, and my son June, who is three years old, donated the maximum legal donations. . . . *I actually could not afford to have all of those family donations to be donations . . . and they needed to be paid back. The only legal way I saw to recoup the donations which I couldn’t afford, was to give ‘the candidate’ a salary[.]*”²⁸
28. These statements, along with the corresponding disclosure information provided by the Committee, support finding reason to believe that Liam, Lauren, Oona, and Darry Madden knowingly permitted their names to be used to effect contributions in the name of another, and that the Committee knowingly accepted contributions in the name of another from these individuals.
29. Further, there is reason to believe the true contributor was an unidentified business owned or operated by Lauren Madden a/k/a Lauren Murphy, which may be a Vermont registered business known as “Lala Earth.” Lala Earth’s registration with the Vermont Secretary of

²⁶ Radio interview.

²⁷ See Rebirth Democracy Committee, July 2022 Quarterly Report at 6, 7, 11.

²⁸ Exh. 3 (emphasis added).

State lists the same address — 30 Meeting House Road, Bellows Falls, VT 05101 — listed on the Committee’s disclosure reports in connection with the contributions from Lauren Madden, Liam Madden, and June Madden.²⁹ That address is also the Committee’s registered address.³⁰ As such, it is likely that Lala Earth is the unidentified business from which Liam Madden drew the funds used to make the contributions in the name of him and his family members. Accordingly, there is reason to believe that the unidentified business, which may be Lala Earth, was the true source of the contributions at issue, and therefore made contributions in the name of another.

30. The available facts therefore support finding reason to believe that Liam Madden, Lauren Madden, Oona Madden, and Darry Madden violated 52 U.S.C. § 30122 by serving as straw donors for \$25,600 in contributions to the Committee, that Lauren Madden’s unidentified business — which may be Lala Earth — violated 52 U.S.C. § 30122 by providing funds to Liam Madden, Lauren Madden, June Madden, Oona Madden, and Darry Madden for the purpose of making \$25,600 in contributions in their own names to the Committee, and that the Committee violated 52 U.S.C. § 30122 by knowingly accepting these contributions in the names of others.

COUNT II

**AN UNKNOWN RESPONDENT VIOLATED 52 U.S.C. § 30116(A)(1)(A)
OR 52 U.S.C. § 30118(A), AND THE LIAM MADDEN FOR CONGRESS COMMITTEE
VIOLATED 52 U.S.C. § 30116(F) OR 52 U.S.C. § 30118(A)**

31. Based on the foregoing, there is reason to believe that Lauren Madden’s unidentified business was the true contributor of \$25,600 given in the names of others to the

²⁹ Exh. 4.

³⁰ Statement of Org. at 1, *supra*.

Committee, and that it therefore made either excessive or prohibited corporate contributions to the Committee.

32. Liam Madden made multiple statements indicating that his wife’s business was the source of the funds he gave to various family members to contribute to his campaign, and that this business is not a corporation. In a post on Twitter on October 28, 2022, he wrote: “The business is a sole proprietorship[.] And is not incorporated.” Again, in a second Tweet, Madden stated that “My wife’s biz is sole proprietorship, not Corp, meaning, it’s our \$, not a corp.” As such, there is reason to believe the resulting contributions from this unidentified business, which may be Lala Earth, exceeded the permitted amount that any “person” — a term that FECA defines to include partnerships, corporations, and “any other organization or group of persons” — can give to a candidate’s authorized committee.
33. The prevailing per-election contribution limit during the 2022 election cycle was \$2,900. As such, if the true contributor of the \$25,600 was an unincorporated business entity, then that entity could legally have given Madden’s campaign up to \$5,800 for the primary and general elections. Accordingly, by contributing \$25,600, there is reason to believe Madden’s wife’s unidentified business made excessive contributions of \$19,800 in violation of 52 U.S.C. § 30116(a)(1)(A), and that the Committee knowingly accepted these excessive contributions in violation of 52 U.S.C. § 30116(f).
34. Alternatively, if Madden’s wife’s business is a corporation — notwithstanding Madden’s statements to the contrary — then it would be prohibited outright from making contributions to any candidate’s authorized campaign committee. Under those circumstances, there is reason to believe this unidentified business made, and the

Committee knowingly accepted or received, \$25,600 in prohibited corporate contributions, in violation of 52 U.S.C. § 30118(a).

COUNT III

THE LIAM MADDEN FOR CONGRESS COMMITTEE VIOLATED 52 U.S.C. § 30104(B)

35. There is reason to believe the Committee violated FECA’s reporting requirements in connection with the payment of \$13,500 to Liam Madden that it falsely described in its disclosure reports as “staff” payments, but which were actually reimbursements for the contributions made by Lauren Madden’s business in the names of others.
36. As noted above, in a radio interview, Liam Madden explained that to meet a fundraising threshold to qualify for a candidate debate, he “drain[ed] all the funds out of my wife’s business operating account, and distribute[d] that to members of my family to donate to my campaign,” but added that because “we can’t actually afford to donate \$25,000 . . . we had to basically pay that back by quote-unquote paying the candidate.”³¹ He also stated: “My wife’s business account had enough money to fund that as long as we paid it back pretty much immediately.”³² Toward the end of the interview, he reiterated the reimbursement aspect of the straw donor scheme: “we took the money out of my wife’s business account and then gave it to family members and then they donated to my campaign. And then, from there I need to get them that money back, so I had to pay the candidate, which you have to do over the course of weeks, because you’re only allowed to legally pay the candidate so much at a time.”³³
37. Consistent with his statements in the radio interview, Madden also posted on Twitter on October 29, 2022: “I actually could not afford to have all of those family donations to be

³¹ Radio Interview.

³² *Id.*

³³ *Id.*

donations, they were intended only to help me be able to debate, and they needed to be paid back. The only legal way I saw to recoup the donations which I couldn't afford, was to give 'the candidate' a salary according to the FEC specifications, until we could pay back our family account, which was all also documented on FEC filings.”³⁴

38. The Committee's disclosure reports show that between May 31, 2022, and August 13, 2022, the Committee made twelve disbursements to Liam Madden for an identical amount, \$1,125, an aggregate total of \$13,500.³⁵ Eleven of these disbursements were described as “Staff” and the twelfth was described as “Staffing.”³⁶
39. Viewed in light of Madden's admission that he could not afford to drain funds from his wife's business to make contributions to his campaign without paying those funds back, which he did by “paying the candidate,” there is reason to believe these twelve disbursements were actually reimbursements for the straw donations made to the Committee to qualify Madden for candidate debates, and thus that these disbursements were falsely reported as payments to Madden for “staff.”
40. FECA requires that political committees accurately report all disbursements, including by specifying the purpose of each disbursement. It is clear that the Committee intentionally obscured the true purpose of these twelve disbursements to avoid acknowledging that these were reimbursements for straw donor contributions. Accordingly, there is reason to believe that the Committee violated FECA's reporting requirements at 52 U.S.C. § 30104(b) by misreporting the purpose of twelve disbursements totaling \$13,500.

³⁴ Exh. 3.

³⁵ Liam Madden for Congress Committee, Disbursements, https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00812008&recipient_name=madden&two_year_transaction_period=2022

³⁶ *Id.*

PRAYER FOR RELIEF

41. Wherefore, the Commission should find reason to believe that Respondents have violated 52 U.S.C. § 30101 *et seq.*, and conduct an immediate investigation under 52 U.S.C. § 30109(a)(2).
42. Further, the Commission should seek appropriate sanctions for any and all violations, including civil penalties sufficient to deter future violations, injunctive relief to remedy these violations and prohibit any and all future violations, and such additional remedies as are necessary and appropriate to ensure compliance with FECA.

Respectfully submitted,

/s/ Saurav Ghosh
Campaign Legal Center, by
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/s/ Roger G. Wieand
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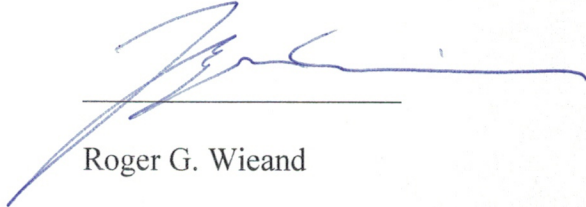
Saurav Ghosh, Esq.
Campaign Legal Center
1101 14th Street NW, Suite 400
Washington, DC 20005
Counsel to the Campaign Legal Center,
Roger G. Wieand
January 17, 2023

VERIFICATION

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

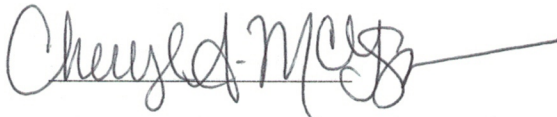
Sworn pursuant to 18 U.S.C. § 1001.

For Complainant Roger G. Wieand



Roger G. Wieand

Sworn to and subscribed before me this 13th day of January 2023.



Notary Public



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 Campaign Legal Center



Saurav Ghosh, Esq.

Sworn to and subscribed before me this 17th day of January 2023.



Notary Public



EXHIBIT A



Liam Madden Vermont Congressional Candidate ✓

@LiamAwakening



Replying to [@VTGOP](#)

There is no need for this tweet. The business is a sole proprietorship And is not incorporated. I am sure I'm within the bounds of the law. I am being outspent 100:1, my fundraising isn't the story. 1/2

1:01 PM · Oct 28, 2022



EXHIBIT B



Liam Madden Vermont Congressional Candidate ✓

@LiamAwakening

...

Replying to [@vtdigger](#)

I gave \$ to my son: legal. Asked him to support my campaign: legal. My wife and I gave our own \$: legal. All within legal limits. All so they'd let me debate. My wife's biz is sole proprietorship, not Corp, meaning, it's our \$, not a corp. Meanwhile Balint gets \$1.7MM from lobby.

10:30 PM · Oct 28, 2022

EXHIBIT C



Liam Madden Vermont Congressional Candidate ✓

@LiamAwakening



1. Regarding the Farce of a Story about my so-called campaign finance violations, here's a letter I am sending to FEC for clarification to all concerned:

Dear FEC,

It has come to my attention that I may have misinterpreted FEC rules and violated them inadvertently. [#VTPoli](#)

11:44 PM · Oct 29, 2022

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Replying to @LiamAwakening

2. In May, multiple primary debates had a requirement of \$35,000 in donations in order to participate. As a first time candidate with no party support or donor lists, I was nearly \$20k short of achieving this criteria which prevents modestly funded candidates from participating



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3. in critical parts of our election process.

So, I read the FEC website to see if I could reach the goal that would enable me to participate in the debates by donating to my own campaign and have family members donate as well. I saw that this practice was allowed

[@vtdigger](#)





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4. (within donation limits) and that it was allowed for children to donate. There was NO SPECIFIC AGE restrictions for children listed. So, among my family, me, my wife, and my son June, who is three years old, donated the maximum legal donations, which were filed appropriately



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5. on my report for that quarter. I was not aware that this is actually an issue, so long as my son consented, which he did. **Given the lack of specificity on age of consent on FEC's website,** I did not see a clear line that I was crossing. But after relaying this process



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6. publicly, many people claim that it is, in fact, an issue, so I am writing this letter to clarify and self-report if it is. A little bit of context may be helpful to consider this case, my campaign has raised less than \$45,000. I am a first time candidate with no staff other



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7. than a part time employee who worked for around 6 weeks several months ago. I have a full time day job. I am being out spent by 100:1. I am not hiding a sophisticated network of donors, I used my own family's money to help close a gap so that I could have my voice be a part of



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8. the debates. I am also not wealthy. I have less than \$###,### in my personal bank account, and no assets other than the equity in my family's modest home. I actually could not afford to have all of those family donations to be donations, they were intended only to help me be



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9. able to debate, and they needed to be paid back. The only legal way I saw to recoup the donations which I couldn't afford, was to give 'the candidate' a salary according to the FEC specifications, until we could pay back our family account, which was all also documented on FEC



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10. filings, and is legal.
So, if I did inadvertently break a rule, which is unclear to me since there is no specific age limitations on what constitutes a consenting donor, I want you to regard this as a good faith error from a regular person running a political campaign who



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11. cannot afford severe fines.
My understanding of the purpose of preventing "straw donors" is so that people who have the means don't circumvent donation limits by giving their money to people acting as conduits, i.e. it prevents rich people from having too much influence,



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12. especially hidden influence. Even if my son's donation was crossing a technical line, this case does not seem to violate this principle. As a candidate, I am legally allowed to spend as much of my money, without any limitations, on my own campaign. I am not a straw donor to



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13. myself, that makes no sense, because I don't need the donations to get the money in question for any campaign expenditures... if I had the money I could have just spent it without limit. I only needed the money to go through the formality of a donation so I could participate



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14. in debates. The idea of using a straw donor as a means to funnel money I couldn't have access to otherwise does not apply to this situation at all. Lastly, the irony would be too ridiculous to contain in any sane person's mind, to punish the candidate who has raised



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15. less than 1% of the money in the race, for having a single donation that derived from the candidate himself, while my opponent was funded by SuperPACs to the tune of \$1.7MM, \$1.1M of which came from a single millionaire, whose SuperPac seemed to have illegally coordinated



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16. with her. Irony poisoning could be a thing, and you'd risk it by ruling my actions as violations worthy of any punitive measures, or really any time at all of FEC employees who I hope have more important matters to which they could attend.

Please advise if further action is



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17. needed.

Respectfully,

Liam Madden

Candidate - Vermont's U.S. Representative

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"You never change things by fighting against the existing reality. To change something, build a new model that makes the existing model obsolete." -

Buckminster Fuller



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Liam Madden for Congress




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18.

- Winner - Vermont Primary Election
- Climate Fellow - Echoing Green
- Institute for Policy Studies - Human Rights Award Winner
- M.I.T. Climate Solver
- Chairman Iraq Veterans Against the War



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EXHIBIT D

[Back](#)**Business Information****Business Details****Business Name:** LALA EARTH**Business ID:** 0323531**Registration Type:** Assumed Business Name**Registration Status:** Expired**Expiration Date:** 12/09/2021**Registration Date:** 10/10/2016**Next Renewal Period Begins:** 10/09/2021**NAICS Code:** 44-Retail Trade**NAICS sub code:** 199-All Other Health and Personal Care Stores**Principal Office Business Address:** 30 Meeting House Road,
Bellows Falls, VT, 05101,
USA**Principal Office Mailing Address:** 30 Meeting House Road,
Bellows Falls, VT, 05101,
USA**Citizenship:** Domestic/VT**Individual Registrant Information****Name:****Address:**

Lauren Murphy

30 Meeting House Road, Bellows Falls, VT, 05101, USA

Registered Agent Information**Name:** Lauren Murphy**Physical Address:** 30 Meeting House Road, Bellows Falls, VT, 05101, USA**Mailing Address:** 30 Meeting House Road, Bellows Falls, VT, 05101, USA**Agent Type:** Individual Person**Business Registrant Information**

No Business Registrants associated with this Assumed Name..

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