

OFFICE OF
GENERAL COUNSEL**BEFORE THE
FEDERAL ELECTION COMMISSION**

2023 AUG -1 PM 2: 21

Rhode Island Republican State Central Committee
1800 Post Road, Suite 17-I
Warwick, RI 02886

Complainant

v.

MUR # 8151

Marvin Abney for Congress
169 Broadway
Newport, RI 02840

Respondent

COMPLAINT

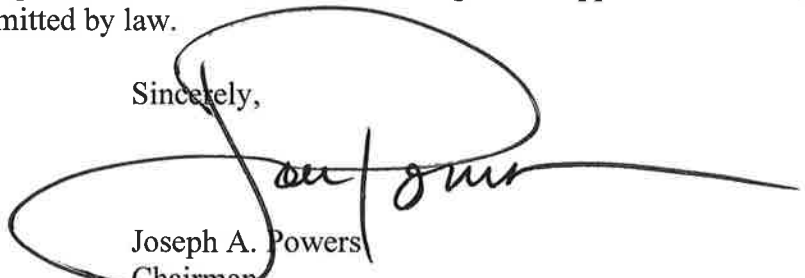
Pursuant to 52 U.S.C. § 30109(a)(1), comes now the Rhode Island Republican State Central Committee, by and through its Chairman Mr. Joseph A. Powers, and files this complaint with the Federal Election Commission (the "Commission") against Marvin Abney for Congress (the "Abney's Campaign") for violating 11 C.F.R. § 100.52 by accepting a loan to his campaign of \$50,000, which does not appear to be from a bank or an advance on a candidate's brokerage account, credit card, home equity line of credit, or other line of credit. This \$50,000 loan to the Abney's Campaign from John Brooks is a contribution that exceeds the federal campaign contribution limitations.

On May 1, 2023, Abney's Campaign received a loan from John Brooks of \$50,000 (See Exhibit A: Marvin Abney FEC Campaign Finance Report for 2nd quarter of 2023, at 14, 22). Mr. Brooks' employer is Engineered Textile Solutions, which does not appear to be a bank or some type of financial institution (See Exhibit B: Providence Journal 7/19/23). Marvin Abney did not respond to press inquiries as to how this loan complies with federal law (*id.*). The federal limits on contributions made by persons to candidates is currently \$3,300 per election, per candidate. The amount of \$50,000 exceeds that limit. At present, Abney's Campaign only has \$14,771.88 on hand (See Marvin Abney FEC Campaign Finance Report for 2nd quarter of 2023, at 2).

Based upon a public search of the Commission's campaign finance data and public news reports, the Respondent appears to have violated 11 C.F.R. § 100.52 by accepting a loan of \$50,000 from John Brooks.

Complainant respectfully requests that the Commission investigate this apparent violation; and assign the maximum fines permitted by law.

Sincerely,


Joseph A. Powers
Chairman
Rhode Island Republican State Central Committee

State of Rhode Island

County of Kent

SUBSCRIBED AND SWORN TO before me on this 20 day of July in the year 2023


Notary Public

My commission expires:

07/25/2023



Image# 202307119582481593

EXHIBIT A

PAGE 1 / 22

**FEC
FORM 3X****REPORT OF RECEIPTS
AND DISBURSEMENTS**
For Other Than An Authorized Committee

Office Use Only

1. NAME OF
COMMITTEE (in full)

TYPE OR PRINT ▼

Example: If typing, type
over the lines.

12FE4M5

Marvin Abney for Congress

ADDRESS (number and street)

PO Box 2546

169 Broadway

Newport

RI

02840

☐ Check if different
than previously
reported. (ACC)

2. FEC IDENTIFICATION NUMBER ▼

CITY ▲

STATE ▲

ZIP CODE ▲

C

C00839126

3. IS THIS
REPORT☒NEW
(N)

OR

☐AMENDED
(A)

4. TYPE OF REPORT

(Choose One)

(a) Quarterly Reports:

- ☐ April 15
Quarterly Report (Q1)
- ☒ July 15
Quarterly Report (Q2)
- ☐ October 15
Quarterly Report (Q3)
- ☐ January 31
Year-End Report (YE)
- ☐ July 31 Mid-Year
Report (Non-election
Year Only) (MY)
- ☐ Termination Report
(TER)

(b) Monthly
Report
Due On:

- ☐ Feb 20 (M2) ☐ May 20 (M5) ☐ Aug 20 (M8) ☐ Nov 20 (M11)
(Non-Election
Year Only)
- ☐ Mar 20 (M3) ☐ Jun 20 (M6) ☐ Sep 20 (M9) ☐ Dec 20 (M12)
(Non-Election
Year Only)
- ☐ Apr 20 (M4) ☐ Jul 20 (M7) ☐ Oct 20 (M10) ☐ Jan 31 (YE)

(c)

12-Day

☐

Primary (12P)

☐

General (12G)

☐

Runoff (12R)

PRE-Election

Report for the:

☐

Convention (12C)

☐

Special (12S)

Election on

M M / D D / Y Y Y Y

in the
State of

(d)

30-Day

POST-Election

☐

General (30G)

☐

Runoff (30R)

☐

Special (30S)

Report for the:

Election on

M M / D D / Y Y Y Y

in the
State of

5. Covering Period

M M / D D / Y Y Y Y
04 01 2023

through

M M / D D / Y Y Y Y
06 30 2023

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Tsandilas, Michael, , ,

Type or Print Name of Treasurer

Signature of Treasurer

Tsandilas, Michael, , ,

[Electronically Filed]

Date

M M / D D / Y Y Y Y
07 11 2023

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 52 U.S.C. § 30109.

Office
Use
Only**FEC FORM 3X**
Rev. 05/2016

Image# 202307119582481606

EXHIBIT A

**SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS**Use separate schedule(s)
for each category of the
Detailed Summary PageFOR LINE NUMBER:
(check only one)

PAGE 14 OF 22

<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input type="checkbox"/> 12	<input type="checkbox"/> 17
<input checked="" type="checkbox"/> 13	<input type="checkbox"/> 14	<input type="checkbox"/> 15	<input type="checkbox"/> 16	<input type="checkbox"/> 17

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

Marvin Abney for Congress

A. Full Name of Individual (Last, First, Middle Initial) or Full Organization Name
Brooks, John, , ,

Mailing Address 32 Division Street

City
NewportState
RIZip Code
02840FEC ID number of contributing
federal political committee.

C

Name of Employer (for Individual)
SelfOccupation (for Individual)
Retired

Receipt For: 2023

☐ Primary ☐ General☒ Other (specify) ▼
Special Primary-2023

Aggregate Year-to-Date ▼

53300.00

Date of Receipt

M M / D D / Y Y Y Y
05 01 2023

Transaction ID : A-12

Amount of Each Receipt this Period

50000.00

☐ Memo Item**B.** Full Name of Individual (Last, First, Middle Initial) or Full Organization Name

Mailing Address

City

State

Zip Code

FEC ID number of contributing
federal political committee.

C

Name of Employer (for Individual)

Occupation (for Individual)

Receipt For:

☐ Primary ☐ General☐ Other (specify) ▼

Aggregate Year-to-Date ▼

Date of Receipt

M M / D D / Y Y Y Y

Amount of Each Receipt this Period

☐ Memo Item**C.** Full Name of Individual (Last, First, Middle Initial) or Full Organization Name

Mailing Address

City

State

Zip Code

FEC ID number of contributing
federal political committee.

C

Name of Employer (for Individual)

Occupation (for Individual)

Receipt For:

☐ Primary ☐ General☐ Other (specify)

Aggregate Year-to-Date ▼

Date of Receipt

M M / D D / Y Y Y Y

Amount of Each Receipt this Period

☐ Memo Item**SUBTOTAL** of Receipts This Page (optional).....▶

50000.00

TOTAL This Period (last page this line number only).....▶

50000.00

Image# 202307119582481594

EXHIBIT A
SUMMARY PAGE
OF RECEIPTS AND DISBURSEMENTS

FEC Form 3X (Rev. 05/2016)

Page 2

Write or Type Committee Name

Marvin Abney for Congress

Report Covering the Period:

From:

M	M	/	D	D	/	Y	Y	Y	Y
0	4		0	1		2	0	2	3

To:

M	M	/	D	D	/	Y	Y	Y	Y
0	6		3	0		2	0	2	3

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. (a) Cash on Hand January 1, <div><div>Y</div><div>Y</div><div>Y</div><div>Y</div><div>2023</div></div>	<div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><di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This committee has qualified as a multicandidate committee. (see FEC FORM 1M)

For further information contact:

Federal Election Commission
 999 E Street, NW
 Washington, DC 20463

Toll Free 800-424-9530
 Local 202-694-1100

Image# 202307119582481614

EXHIBIT A

SCHEDULE C (FEC Form 3X)**LOANS**Use separate schedule(s)
for each category of the
Detailed Summary Page

PAGE 22 OF 22

FOR LINE 13 OF FORM 3X

NAME OF COMMITTEE (In Full)

Transaction ID : C-12

Marvin Abney for Congress

LOAN SOURCE Full Name (Last, First, Middle Initial)
Brooks, John, , ,N ☐ Memo Item

Election: 2023

☐ Primary☐ General☒ Other (specify) ▼

Mailing Address 32 Division Street

City

Newport

State

RI

ZIP Code

02840

Special Primary-2023

Original Amount of Loan

50000.00

Cumulative Payment To Date

0.00

Balance Outstanding at Close of This Period

50000.00

TERMS

Date Incurred

M 05 / D 01 / Y Y Y Y 2023

Date Due

M M / D D / Y Y Y Y

Interest Rate

6.5%

% (apr)

Secured:

☐ Yes☒ No**List All Endorsers or Guarantors (if any) to Loan Source**

1. Full Name (Last, First, Middle Initial)

Name of Employer

Mailing Address

Occupation

City

State

ZIP Code

Amount
Guaranteed
Outstanding:

2. Full Name (Last, First, Middle Initial)

Name of Employer

Mailing Address

Occupation

City

State

ZIP Code

Amount
Guaranteed
Outstanding:

3. Full Name (Last, First, Middle Initial)

Name of Employer

Mailing Address

Occupation

City

State

ZIP Code

Amount
Guaranteed
Outstanding:

4. Full Name (Last, First, Middle Initial)

Name of Employer

Mailing Address

Occupation

City

State

ZIP Code

Amount
Guaranteed
Outstanding:**SUBTOTALS** This Period This Page (optional)..... ►

50000.00

TOTALS This Period (last page in this line only)..... ►

50000.00

Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.

EXHIBIT B

The Providence Journal

POLITICS

CD1 candidate fell 42 signatures short of qualifying. But did a loan violate FEC campaign laws?

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Rhode Island House Finance Committee Chairman Marvin Abney's brief congressional campaign could turn out to be expensive.

Abney, an Army veteran and respected member of House leadership, fell 42 signatures short of qualifying for the Democratic primary ballot and will now turn his attention back to representing Newport at the State House.

Despite credentials, Abney lagged in fundraising

Abney, who led the powerful House committee at the center of writing the state budget, struggled to raise enough money in his congressional campaign to keep up with Democratic primary rivals.

In the three months he was running, Abney collected only \$27,000 in donations and spent \$62,000, according to his second-quarter filing with the Federal Election Commission. (By comparison, Democratic rivals Aaron Regunberg and Gabe Amo each raised over \$400,000 in the second quarter.)

Abney's campaign needed a loan to stay afloat, but did it follow the rules?

To make up the difference and push on toward the September primary, the Abney campaign borrowed \$50,000 from Newport resident and political donor John Brooks.

Although the loan from Brooks kept Abney's campaign out of the negatives, it is unclear whether it complies with federal election rules.

EXHIBIT B

According to the FEC website, a loan from a person to a campaign "is considered a contribution" under election law and is subject to the federal \$3,300 individual annual limit on donations to any one candidate.

"Bank loans" are not considered contributions subject to the individual limit, the FEC says, "if made in the ordinary course of business and on a basis that assures repayment."

Since Brooks, who lists Engineered Textile Solutions as his employer with the state Board of Elections, is not a bank, that exemption does not appear to apply.

A \$50,000 contribution on its own would be over the annual legal limit, but Brooks also donated \$3,300 to Abney's campaign on May 1, the same day the loan was reported.

Brooks has donated to a number of top Democratic politicians in recent years, including Gov. Dan McKee, former Gov. Lincoln Chafee, Attorney General Peter Neronha and gubernatorial candidate Helena Foulkes.

Asked Monday whether the \$50,000 loan complied with federal contribution limits, Abney said he would need to check with the person who manages the campaign's finances. He could not be reached Tuesday.

In addition to Brooks, Abney's donors included House Speaker K. Joseph Shekarchi (\$1,000,) former Senate president Teresa Paiva Weed (\$250) and Chafee (\$2,000).

Even with those contributions, the money from Brooks made up more than two-thirds of Abney's campaign cash.

If he had made the ballot, the \$15,000 Abney had in the bank at the end of June would have put him at a massive financial disadvantage against a crowded field where six candidates had more than \$100,000 in the bank at the start of this month.