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OFFICE OF GENERAL
COUNSEL

Office of General Counsel
Federal Election Commission
999 E Street NW
Washington DC 20463

To whom it may concern:

I write to alert you to a potential violation of the Federal Election Campaign Act and Commission regulations.

In the 2014 Election Cycle, contributions to candidates by persons other than multicandidate political committees were limited to $2,600 per election. 11 CFR §110.1.

Political committees are considered affiliated and share a single contribution limit where the committees are "established, financed, maintained or controlled by ... the same person or group of persons." 11 CFR §110.3(a)(2).

Based on information and belief, the following individuals and committees exceeded the contribution limit applicable to affiliated committees, or circumvented contribution limits in a scheme that used non-connected committees as straw donors to make aggregate contributions in excess of legal limits:

1. Gwendolyn Beck (H4VA08331), in her capacity as a candidate ("Beck");
2. The Committee to Elect Gwendolyn Beck (C00562157) ("Campaign Committee");
3. Coalition of Independent Voices in Congress (CIVIC) (C00566026) ("CIVIC"), a non-connected committee, and its treasurer, Gwendolyn Beck;
4. Eagles Party PAC (C00557017), a non-connected committee, and its treasurer, Gwendolyn Beck;
5. Richard Kramer of 41 W Putnam Ave, Greenwich CT 06830 ("Kramer"), a contributor to both Campaign Committee and Eagles Party PAC; and
6. Jeffrey Epstein of 6100 Red Hook Quarter Apt B3, St. Thomas, VI 00802 ("Epstein"), a contributor to Campaign Committee, CIVIC, and Eagles Party PAC.

Statements of fact are supported by the reports filed by Campaign Committee, CIVIC, and Eagles Party PAC in 2014.

Affiliated Committees

CIVIC and Eagles Party PAC appear to be affiliated. Beck and an associate, Ginger Vuich, serve (or in Vuich's case, served) as agents of both committees. Both committees are financed, in whole or in part, by Epstein.

CIVIC

Ginger Vuich filed a Statement of Organization for CIVIC on July 10, 2014, listing Beck as assistant treasurer. The Commission noted that CIVIC did not complete line 6 and requested that the Committee amend its statement to indicate complete line 6 to show either "none" or any connected organization, affiliated committee, joint fundraising representative or leadership PAC sponsor. Vuich filed an amended statement of organization showing "none" on line 6, again listing Beck as assistant treasurer on or about October 1, 2014. Vuich attempted to resign as treasurer using a Form 99 submission on November 26, 2014. Beck filed an amended statement of organization naming herself as treasurer on December 17, 2014. Beck was, at all times, an agent of the Committee.

CIVIC has received only one contribution. Epstein gave $5,000 on July 11, 2014.

CIVIC has made only one contribution. It contributed $2,600 to Campaign Committee on November 5, 2014.

CIVIC appears to have been established by and to be controlled by Beck. It appears to have been financed by Epstein.

Eagles Party PAC

Beck filed a statement of organization for Eagles Party PAC on February 11, 2014. The statement listed Beck as "National Director/Treasurer" and Ginger Vuich as assistant treasurer. As with CIVIC, the Commission requested that line 6 be completed. Beck filed an amended statement on March 10, 2014 with "none" listed on line 6. Another amended statement was filed on December 17, 2014, removing Vuich as an agent.

Beck, Epstein, and Kramer are the only donors to Eagles Party PAC. Beck having contributed $700 and Epstein and Kramer contributing $5,000 each (NB: A Form 99 submission indicates that Beck contributed $1,700, but the quarterly report shows a loan repayment of $1,000).

Eagles Party PAC made only one contribution. It contributed $2,600 to Campaign Committee.

Eagles Party PAC appears to have been established by and to be controlled by Beck. It appears to have been financed by Epstein and Kramer.

CIVIC and Eagles Party PAC appear to have been established and controlled by Beck. The Committees appear to have been financed, in whole or in part, by Epstein. Vuich appears to have played some role in establishing and controlling the Committees.

The Committees appear to be affiliated and, as such, should each show the other as an affiliated committee on line 6 of the statement of organization and should share a single contribution limit of $2,600—a limit exceeded when each committee independently gave $2,600 to the Campaign Committee on November 5, 2014.

Nonconnected Committee Straw Donors

Regardless of whether CIVIC and Eagles Party PAC are affiliated, it appears that Epstein and Kramer, knowingly or unknowingly, through Beck's management used the Committees to make excessive contributions to Campaign Committee.

Epstein contributed $2,600 to campaign committee on April 22, 2014; $5,000 to Eagles Party PAC on April 17, 2014; and $5,000 to CIVIC on July 11, 2014.

Kramer contributed $5,000 to Eagles Party PAC on February 7, 2014 and $2,500 to Campaign Committee on June 17, 2014.

Between direct and indirect contributions, Epstein and Kramer contributed $10,300 to Campaign Committee, well in excess of the $5,200 that would result from each contributing the $2,600 allowed by law.

Had Epstein and Kramer been among several donors to CIVIC and Eagles Party PAC and those committees had made contributions to more than one candidate's campaign committee, there might be an alternative explanation for these transactions, but it strains credulity to argue that these were anything other than straw donations.

In *McCutcheon*, et al. *v. FEC*, the Commission based its defense of aggregate contribution limits, in part, on the theory that they served the legitimate interest of "prevent[ing] evasion of the $1,000 contribution limitation by a person who might otherwise contribute massive amounts of money to a particular candidate through the use of unearmarked contributions to a political committee likely to contribute to that candidate..." Brief for the Appellee at 33, McCutchen, et al., v Federal Election Commission, No. 12-536 (U.S. Apr. 2, 2014) (quoting *Buckley v Valeo*, 424 U.S. 1, 38 (1976) (*per curiam*)).

While the Court ultimately declined to uphold the aggregate limits, no one doubts that employing the scheme described in Buckley is illegal circumvention of contribution limitations.

Improper Reporting

In addition to the issues surrounding contribution limitations, the reports filed by Campaign Committee and Eagles Party PAC are riddled with errors.

Campaign Committee, for example, in its post-general report, showed contributions from an individual and from CIVIC and Eagles Party PAC on line 11(b) of Schedule A, which is reserved for contributions from party committees, rather than on line 11(a) and 11(c) respectively.

Eagles Party PAC failed to report the source of its opening balance on its April Quarterly report. In response to the Commission's request, the Committee attempted to disclose the source using Form 99. Its explanation appears to indicate that the Committee exceeded the $1,000 registration threshold in 2013 with $1,700 in receipts, but failed to file a statement of organization until February 2014.

Thank you for considering this complaint. I look forward to learning the outcome of the complaint when the case is closed.

Sincerely,

Christopher M. Marston

Alexandria VA 22314

City of Alexandria
Commonwealth of Virginia
The foregoing instrument was subscribed and sworn before me this 23 day of Feburary, 2015 by Christopher M. Marston

Brenda M. Hankins
Notary Registration Number: 7611263
My Commission expires: 7/31/2018

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