

RECEIVED
FEC MAIL CENTER
2019 OCT 23 PM 5:11
2019 OCT 25 PM 12:40
Youth Policy Institute, Inc.
6464 Sunset Blvd., Ste. 650
Los Angeles, CA 90028

OFFICE OF
FEDERAL COUNSEL

Complainant,

v.

MUR # 7653

Dixon Slingerland

Studio City, CA 91604

Respondent.

COMPLAINT

Complainant files this complaint under 52 U.S.C. § 30109(a)(1) against Dixon Slingerland for violations of the Federal Election Campaign Act (“FECA”), as described below.

COMPLAINANT

1. The Youth Policy Institute, Inc. (“YPI”) is a 501(c)(3) non-profit organization headquartered in Los Angeles, California. YPI operates after-school and extra-curricular programs at approximately 100 sites across the city, serving tens of thousands of impoverished youth and adults and providing access to high-quality education and economic opportunities.

RESPONDENT

2. In 1996, Respondent Dixon Slingerland became head of YPI, and thereafter held various titles, including Executive Director, Chief Executive Officer, and President.

3. Slingerland was terminated on September 23, 2019.

FACTUAL ALLEGATIONS

4. In April 2019, as part of the annual independent audit, YPI’s auditor identified various expenditures by Respondent that the auditor believed were irregular. The auditor reported these concerns to the Board of Directors, which formed a Special Committee to

investigate Respondent's expenses. The Special Committee retained counsel and a forensic accountant, who reviewed five years of statements of YPI's American Express card and Respondent's reimbursement reports.

5. The investigation revealed a number of questionable transactions, including three contributions to federal political committees (the "Contributions"):

- On May 15, 2018, Respondent used the YPI American Express card to make a \$5,000 contribution to the Democratic Midterm Victory Fund.
- On May 31, 2018, Respondent used the YPI American Express card to make a \$5,000 contribution to the Kaine Victory Fund.
- On October 2, 2018, Respondent used the YPI American Express card to make a \$5,000 contribution to the American Possibilities Fund.

6. YPI funds were used to pay the charges that Respondent incurred on the American Express card. YPI had not approved the transactions for the Contributions. Respondent did not tell or ask anyone at YPI about the Contributions transactions. The Federal Election Commission ("FEC" or "the Commission") reports indicate that Respondent as an individual made the Contributions even though the funds were in fact from YPI.

7. On October 3, 2019, in light of these facts, YPI made a *sua sponte* submission with the Commission. On October 10, the Commission requested that YPI file this complaint.

8. Also on October 3, 2019, YPI notified the three political committees that received the Contributions and requested the funds be returned. On October 21, YPI received a refund from the Kaine Victory Fund.

COUNT I

9. FECA prohibits making a contribution in the name of another person or knowingly permitting one's name to be used to effect such a contribution. 52 U.S.C. § 30122. Respondent knowingly permitted his name to be used to effect the Contributions using the funds of another, thus violating the FECA prohibition.

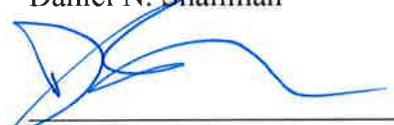
COUNT II

10. FECA requires federal political committees to submit reports that identify each person who makes a contribution or contributions that have an aggregate amount or value in excess of \$200 within the calendar year. 52 U.S.C. § 30104(b)(3)(A). When making the contributions, Respondent falsely certified that the funds were his own and were not from an organization or corporation. He thus caused erroneous reports to be made to the FEC by the federal political committees that received the Contributions.

WHEREFORE, YPI requests that the Commission conduct an investigation into these allegations, declare the respondent to have violated the federal campaign finance laws, impose sanctions appropriate to these violations and take such further action as may be appropriate.

Respectfully submitted,

Anthony Herman
Daniel N. Shallman



*Counsel for the Special Committee of
The Youth Policy Institute, Inc.*

CALIFORNIA JURAT WITH AFFIANT STATEMENT

GOVERNMENT CODE § 8202

See Attached Document (Notary to cross out lines 1-6 below)
 See Statement Below (Lines 1-6 to be completed only by document signer[s], *not* Notary)

A line graph showing a curve that starts at the origin (0,0) and curves upwards to the right, representing a function that increases at a decreasing rate. The x-axis is labeled "Signature of Document Signer No. 1" and the y-axis is labeled "Signature of Document Signer No. 2 (if any)". The curve passes through approximately (1, 1), (2, 1.5), (3, 2), (4, 2.2), (5, 2.4), (6, 2.5), (7, 2.6), (8, 2.7), (9, 2.8), and (10, 2.9).

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California

County of Los Angeles

Subscribed and sworn to (or affirmed) before me

on this 22nd day of October, 2019,
by Date Month Year

by
(1) Daniel N. Shallman

(and (2)),

Name(s) of Signer(s)

proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.

Signature Rita L. Joann L

Seal
Place Notary Seal Above

OPTIONAL

Though this section is optional, completing this information can deter alteration of the document or fraudulent reattachment of this form to an unintended document.

Description of Attached Document

Title or Type of Document: Complaint Document Date: 10/22/2019

Number of Pages: 3 Signer(s) Other Than Named Above: None