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FEDERAL ELECTION  
COMMISSION

2016 JUN 24 PM 12: 21

Seth R. Gunning

Roswell, Georgia 30075

OFFICE OF GENERAL  
COUNSEL

MUR # 7092

Office of General Counsel,  
Federal Election Commission  
999 E Street, N.W.,  
Washington, D.C. 20463

June 22, 2016

### Political Action Committee Complaint

My name is Seth Ryan Gunning. I reside at \_\_\_\_\_, Roswell, Georgia, 30075. I write today to file a formal complaint against the Non-Connected Political Action Committee "Socially Responsible Government" (Committee ID number C00600817), formerly known as the "Feel Bern" PAC, created on 12/28/2015. This complaint alleges potential legal and regulatory violations committed by the "Socially Responsible Government" PAC (hereinafter referred to as "the PAC"), and its CEO Kyle Prall of 7301 RR 620 North, Suite 155-146, Austin, Texas, 78726.

Information provided in this complaint is sourced from publicly available material including from the Federal Election Commission's online "Candidate and Committee Viewer," the PAC's filings to the FEC, the PAC's website, which is listed on its FEC Statement of Organization filings ([www.feelbern.org](http://www.feelbern.org)), and from the offices of the Secretary of States of Michigan, Wyoming, and Texas.

This complaint is broken into three parts. Each represents a potential violation of Federal Election Commission Regulations and/or Federal Law:

1. Unauthorized use of a candidate's name
2. Fraudulent solicitation of funds
3. Misuse of committee funds and accounts

The evidence in this complaint supports the finding that the PAC has violated at least the following Federal Election Commission Regulations and federal laws governing campaign finance. This list is not exhaustive and may not include all applicable statutes.

- The Federal Election Campaign Act (FECA) of 1971;
- Lanham (Trademark) Act (enacted 1946), codified at 15 U.S.C. § 1051;
- 11CFR 102.14 (a) and 102.14 (b)(3)- Name of Political Organizations;
- 11CFR 113.1 (g) - Permitted and Prohibited Use of Campaign Accounts;
- 2USC 439 and 52 USC 30114- Use of Contributed Amounts for Certain Purposes.

#### Unauthorized use of a candidate's name

Pursuant to 11CFR 102.14(a) and (b)(3) a nonconnected political action committee that is not an authorized committee of a candidate for Federal Office may not use a candidate's

name in any title under which the committee makes solicitations or in other communications to the general public, unless the name clearly shows opposition to the candidate. The "Socially Responsible Government" PAC is not registered as an authorized committee of any candidate. Yet, the PAC has used the name of Sen. Bernie Sanders in the title of its website, in its online fundraising solicitation material, the name under which it is soliciting online donations, and in its logo.

In its Statement of Organization filings with the FEC, The PAC provides that its website is [www.feelbern.org](http://www.feelbern.org). This website name clearly includes the name of Sen. Sanders, candidate for President of the United States. Though the full name "Bernie Sanders" is not included in the website title, any reasonable person would conclude that the "Bern" in "[www.feelbern.org](http://www.feelbern.org)" is referring to Sen. Sanders. The PAC also refers to itself as "Feel the Bern" -- the former name of the PAC -- in several places on that website (appendix A).

In addition to the unauthorized use of Sanders' name in the title and content of its website, the PAC also uses the full name of Bernie Sanders in its logo, which is prominently displayed on every page of that website. This logo reads: "Socially Responsible Government / Feel The Bern / Committee to Elect Bernie Sanders" as is seen here (appendix B):



The PAC also uses the name of Bernie Sanders in fundraising solicitation, which appears on its website (<https://secure.qgiv.com/for/feethber>) and in online fundraising advertisements. The following claim is made on the fundraising page of [www.feelbern.org](http://www.feelbern.org) (appendix B):

"Your contribution goes directly toward paying for training volunteers to knock on doors, make phone calls and spread the word about Bernie's movement."

Lastly, the PAC uses the name "Feel the Bern Committee" in advertisements purchased and run on search engines and on social media platforms (appendix C). I believe that this use not only violates FEC statute governing the use of a candidate's name, but also is a False Designation of Origin under the Lanham Act.

I believe that the PAC and its administrators have clearly used the name of Bernie Sanders in a means that violates FEC regulations on the use of a candidate's name and committee naming. The PAC is not an "authorized PAC," does not oppose the candidacy of Sen. Sanders for President (which would allow the use of the candidate's name), and has clearly used the Senator's name in order to solicit funding. Copies of the PAC's campaign website, logo, online fundraising page and samples of PAC-funded online fundraising advertisements are provided in the appendix of this document. It appears, due to the PAC's pervasive disregard for and violation of the statutes governing the use of candidate names and the naming of Political Action Committees, that the PAC's actions have meant to intentionally

and maliciously deceive potential contributors into believing they are donating to an authorized committee or directly to the campaign of Bernie Sanders for President.

### **Fraudulent Solicitation of Funds**

A Political Action Committee that misleads contributors about its support of and operations to support a candidate in order to induce contributions is committing false advertising for its own commercial purposes. As was found in *Ken Cuccinelli For Governor, Inc. v. Conservative Strikeforce PAC*, this type of false advertising and fraudulent solicitation occurs to the detriment of the candidate competing with the PAC for contributions and is, therefore, I believe, in violation of the Lanham Act. Just as the Federal Trade Commission uses this law to prevent and penalize a product manufacturer that uses misleading advertising to increase its own product sales to the detriment of its competitors, I believe it is also the duty of the FEC to enforce agency statute -- and develop them where they do not already exist -- to prevent and penalize fraudulent solicitation of PAC donations by the making of false claims.

Based on the publicly available evidence that I provide in this document, I believe "Socially Responsible Government" has engaged in fraudulent solicitation of funds by the making of false claims and false advertisements and is operating as what has popularly become known as a "Scam PAC," where committee fundraising is the end in itself, and the political candidate invoked in the PAC's solicitations is merely a means to the PAC's commercial end.

In addition to claiming on its public website that the PAC will develop television, radio, and Internet advertisements, the PAC makes at least three specific claims about how the committee will "directly" and "primarily" spend money raised from online donations in the 2016 primary election cycle. Despite these claims, according to all the PAC's FEC filings available to date (representing the fourth quarter of 2015 and first quarter of 2016), the PAC has spent \$1,500 or less than 1% of its total expenditures on these initiatives. On its website, the PAC lists three major committee initiatives being funded by online donations:

- Free Voter ID Transportation Assistance Initiative
- Free Voter Transportation Drive Initiative
- Training Volunteers for "Get Out the Vote" campaign efforts

First, the PAC -- identifying itself again as "Feel The Bern" on this particular website page -- claims that it will use contributions to the PAC to provide free transportation to assist individuals in the acquisition of necessary voter identification prior to elections. From the [www.feelbern.com](http://www.feelbern.com) website, "Initiatives" page (appendix A):

#### **"WHAT WILL YOUR DONATION BE USED FOR?"**

Volunteers will coordinate the charter buses and individual shuttle drivers which will transport individuals to government offices such as the social security office, DMV, Veterans Affairs and others. Elderly and disabled individuals will be assisted in reaching offices and facilities, completing forms, and registering to vote. Effort and money will first be focused on areas with high numbers of at-risk individuals when it comes to having the necessary documents to vote.

Inner cities and low income areas tend to represent the highest concentration of individuals who lack ID.

### **FUNDING GOAL**

Our goal is to raise \$25,000 in donations over the next 10 months. This money will go directly to chartering buses and paying for fuel to assist voters in obtaining the necessary ID to vote."

Secondly, the PAC claims that donations will be used "primarily" to provide free transportation to the elderly and disabled to reach voting polls. The PAC lists eight U.S. cities in which it will conduct this initiative and provide free transportation services to voters. From the [www.feelbern.com](http://www.feelbern.com) website, "Initiatives" page (appendix D):

### **"WHAT WILL YOUR DONATION BE USED FOR?"**

The donations will be used primarily to charter buses for transportation to the voting polls during the US Presidential elections. The money will also be used to reimburse volunteers who use their own cars to transport people for fuel. The geographic areas that will be selected for this initiative include major cities in political swing states such as:

- Miami, FL
- Cleveland, OH
- Milwaukee WI
- Philadelphia, PA
- Des Moines, IA
- Las Vegas, NV
- Denver, CO
- Virginia Beach, VA

This is not an all inclusive list, and the planned cities may be adjusted to include states where the Presidential election is very close. Volunteers will assist the elderly and those with disabilities to get on and off the bus, and assistance at the polling places.

### **FUNDING GOAL**

Our goal is to raise \$25,000 in donations over the next 10 months. This money will go directly to chartering buses and paying for fuel to transport voters to Presidential election polls."

Lastly, the PAC makes several unfulfilled claims regarding primary election 'Get out the Vote' efforts. On the "Democratic Primary Voting Drive Initiative" page of the website the PAC claims that the PAC will purchase television and radio advertisements in battleground states. Additionally, on both the "Democratic Primary Voting Drive Initiative" and "Donate" pages of its [www.feelbern.org](http://www.feelbern.org) website that the PAC will use donations to fund door-to-door canvassing initiatives, phone-drives, and to purchase of campaign materials like pamphlets (appendix B and E):

"Your contribution goes directly toward paying for training volunteers to knock on doors, make phone calls and spread the word about Bernie's movement. It also helps pay for our initiatives to help voters obtain the appropriate ID and transportation to voting facilities."

"3. Word-of-Mouth – Grassroots voter drives, door-to-door knocking, local events and phone calls are some of the most effective means of spreading the word with minimal cost. Volunteers in every state are standing by to begin these various initiatives. The funds raised will be used to pay for informational pamphlets, buttons, bumper stickers, t-shirts, and other campaign swag. In addition, funds will also be used for phone drives and for donations to other local Bernie support groups for door-to-door knocking drives."

For each of these three initiatives the PAC even goes so far as to provide a fundraising goal and timeline for funding the particular initiative. The website shows that these pages were published in July and November of 2015. These statements are found at the bottom of each initiative page.

"FUNDING GOAL Our goal is to raise \$25,000 in donations over the next 10 months. This money will go directly to chartering buses and paying for fuel to assist voters in obtaining the necessary ID to vote."

Cumulatively, these fundraising goals and initiative budgets total \$70,000. A review of the PAC's FEC filing shows that by the end of Q1 2016 the PAC effectively raised nearly four times that amount (\$261,213). Despite having raised significantly more than the claimed budget for each initiative the PAC has spent just \$1,500 of its nearly \$200,000 in total disbursements, or less than 1%, to support these "Democratic Primary" initiatives, according to the PAC's currently available FEC filings. This \$1,500 comes in the form of just two independent expenditures; one made on 2/24/2016 to the Democratic Party (\$1,000) and one made on 3/30/2016 to [www.voteriders.org](http://www.voteriders.org) (\$500). Notably, the PAC's expenditure made to [www.voteriders.org](http://www.voteriders.org) (an organization that does provide transportation assistance to voters) came *AFTER* the primary and caucus elections of six of the eight locations the PAC lists as target areas for its transportation assistance program. To date, it appears that no expenditures have been made to support the PAC's other claimed operations/initiatives, including but not limited to: the training of campaign volunteers to conduct door-knocking canvasses or make phone calls on behalf of the candidate Bernie Sanders, or to provide transportation to individuals in order to acquire appropriate voter identification.

I believe these findings clearly detail how the PAC has fraudulently solicited funds by making false advertisements under a false designation of origin, and by the making of false claims about the nature and operations of the committee.

### **Misuse of committee funds and accounts**

A review of the PAC's FEC filings shows that instead of using contributions to fund the campaign initiatives it promises on its website, the PAC is actually a) funneling an exorbitant amount of the PAC's dollars to a small handful of PAC operatives and b) funding the growth and maintenance of its online fundraising apparatus.

As previously stated, I believe this sort of "Scam PAC" activity -- where the PAC is clearly using false advertisement and the name of a popular political candidate to procure

donations solely for its own commercial ends in detriment to the candidate whose campaign the PAC invokes to solicit those donations -- is in direct violation of the Lanham Act. Furthermore, I believe that the excessive and suspicious volume of payments made to three of the PAC's associates (PAC CEO Kyle Prall, his attorney Joseph Centrich, and PAC associate/contractor Johan Garcia) -- especially when viewed in their proportion of total PAC expenditures -- presents a clear use of the PAC and PAC contributions by PAC administrators for personal use, in violation of 11CFR 113.1 (g) - Permitted and Prohibited Use of Campaign Accounts and 2USC 439 and 52 USC 30114 - Use of Contributed Amounts for Certain Purposes. In addition, I believe that the PAC made and reported four expenditures payments to a Miami, Florida night club, which clearly violates statutes that outline the prohibition of the use of funds for personal use, admission to and gratuity at recreational events and venues, and for non-PAC related expenses (11CFR 113.1 (g)(1)(i)(F), 11CFR 113.1 (g)(1)(i)(G) and 52 USC 30114 (b)).

Below, I provide the publicly available evidence I have been able to gather that substantiates these beliefs. However, corporate privacy/secretcy laws have allowed the PAC administrators to obfuscate, to some degree, the nature of these violations by funnelling PAC expenditures through recently created shell corporations. I provide as much information about these corporations, their relationship to PAC administrators, the nature of their alleged work, and the flow of PAC money to them, as is publicly available and as I have been able to gather. I believe PAC administrators have/are using these shell corporations, and an anonymous online independent contracting service, to hide violations of misuse of PAC funds and use of PAC accounts for personal use.

The PAC's total expenditures for the last quarter of 2015 and first quarter of 2016 were \$199,115, according to the PAC's FEC filings. A review of the PAC's filing shows that roughly 33% of the PAC's disbursements, or roughly \$66,000, have been used to procure online advertisement space from two vendors: Facebook and Google. The PAC does claim in its "initiatives" page that some funds will be used to purchase online advertisements in support of Bernie Sander's bid for Democratic Party nominee for President. However, as previously mentioned, the content of the advertisements purchased by the PAC (under the name "Feel the Bern") *are solely to generate additional contributions to the PAC* rather than to support any candidate or educate an audience on a particular issue important to the Candidate's campaign(appendix c). The content of these advertisements, published under the "Team Bern" and "Feel the Bern" committee names, provides no information about either the candidate or the positions of the candidate, while using the candidate's name and images of the candidate to ask advertisement audiences to "Donate to Our Campaign" or "Take the Next Step and Contribute Today."

Further review of the PAC's filings shows that at least 44% (\$88,000), and as much as 51% (\$102,000), of the PAC's total expenditures has likely been funnelled to just three individuals involved in the PAC's administration: CEO Kyle Prall, of Austin, Texas, Attorney Joseph Centrich, also of Austin, Texas, and online marketer Johan Garcia, of Miami/Ft. Lauderdale, Florida. From a review of the PAC's independent expenditure reporting to the FEC in Q4 2015 and Q1 2016, we see that the largest single and cumulative expenditures made to entities other than Facebook or Google are made to just four entities: LCGM LLC of Eaton Rapids, Michigan; NHT Productions of Eaton Rapids, Michigan; CEO Kyle Prall; and DMF Marketing Solutions LLC of Cheyenne, Wyoming.

Before going further I believe it relevant to provide background information on PAC CEO Kyle Prall. In addition to his position at the "Socially Responsible Government" PAC, Prall is listed as the Director and President of Citizens Information Associates, LLC and previously as the CIA of Star Nine Ventures Inc, both incorporated in the State of Texas (appendix F). Citizen Information Services and Star nine Ventures are well known for their websites [www.bustedmugshots.org](http://www.bustedmugshots.org) and [www.mugshotsonline.com](http://www.mugshotsonline.com). In previous years, these websites published and publicized individual mugshots through online website, advertisements, and search engine optimization. The companies then offered, the subjects of those mugshots, for the images to be removed if they agreed to pay the company an exorbitant fee. The practice was widely criticized in a series of national newspaper articles in 2011-2012 as a form of online-extortion. At least one class action lawsuit has been filed and settled which alleged Mr. Prall had, among other things; violated the Pattern of Corrupt Activities Act, had extorted money from defendants, and had wrongfully appropriated, without consent, the names, photographs, images, and likenesses of individuals for a commercial purpose that benefits only the defendant's (appendix G). In settlement, Mr. Prall and company were forced to pay reparations to defendants and to cease the company's practice of requesting payment to remove photos from their websites. This history helps to demonstrate a pattern of Mr. Prall attempting to skirt the law while ripping off individuals online by, in part, misappropriating the names and images of individuals for personal profit.

According to PAC FEC filings, every two weeks during Q1 2016 the PAC made payment to CEO Prall in the amount of \$3,845, made in two payments on the same day, for a total of \$23,070. Below is a brief summary of each of the three LLC's that have received a lionshare of the PAC's remaining expenditures, including their relationship to PAC administrators:

- LCGM, LCC was incorporated in Michigan on 2/4/16 by a filing agent working for Incorp Services, INC. LCGM, LLC received its first and largest payment from the PAC -- \$16,849 -- just seven days after incorporating. Over three payments; LCGM is paid \$31,641.93 by the PAC in less than six weeks. The State of Michigan requires little information for incorporation, and after extensive searching I have found no other publicly available information on the nature of operation for LCGM, LLC. However, one Johan Garcia (himself a direct recipient of a PAC expenditure/payment of \$3,300 on 1/05/2016) is listed as the webmaster for [www.LCGM-LLC.com](http://www.LCGM-LLC.com), registered with a Florida address. This provides reasonable suspicion that Mr. Garcia is also the owner of the LCGM, LLC registered in Michigan and recipient of the over \$31,000 in PAC expenditures. Filing paperwork for LCGM LLC and webmaster administration for [www.lcgm-llc.com](http://www.lcgm-llc.com) are provided as appendix H.
- NHT Productions, LLC was also incorporated in Michigan on 1/20/2016 by the same filing agent company that incorporated LCGM, LLC, (Incorp Services Inc). NHT has the same business address listed as LCGM, LLC (a P.O. Box in Michigan). NHT Productions received its first and largest payment on 2/02/2016, just 12 days after incorporating -- for \$12,500. NHT received a total of \$22,075 in expenditures from the PAC made in just two payments within 20 days of one another. After extensive searching I have found no publicly available information on the nature NHT

Productions business or on any agents of NHT Productions, LLC. Filing paperwork for NHT Productions, LLC is provided as appendix I.

- DMF Marketing Solutions, LLC was incorporated on 2/03/2016 in Cheyenne, Wyoming. They were incorporated by the same filing agent as both LCGM, LLC and NHT Productions, LLC. DMF Marketing Solutions LLC receives one expenditure payment from the PAC for \$8,750 just one month after incorporating. Joseph Centrich of Woodland, Texas, is listed as the "organizer" of DMF Marketing Solutions LLC on its Wyoming incorporation filings. Mr. Joseph Centrich, a business litigation attorney practicing in The Woodlands, Texas, is also listed as the filing agent for a Citizens Information Associates, LLC of which PAC CEO Prall is President and Director. Mr. Centrich also acted as attorney to CEO Prall during the class action lawsuit brought in US District Court against Mr. Prall and Citizens Information Associates LLC. Filing paperwork for DMF Marketing Solutions LLC and Citizens Information Associates LLC are provided in appendix J.

In addition, on 2/29/2016 the PAC has reported making four expenditures totalling \$3,101.92 at a Miami, Florida, based nightclub called E11Even. According to the Nightclub's publicly available calendar, the venue was open to the public for a concert on February 29th, 2016 (<http://11miami.com/calendar/>). These expenditures violate statutes that outline the prohibition of the use of funds for personal use, for admission to and gratuity at recreational events and venues, and for non-PAC related activity (11CFR 113.1 (g)(1)(i)(F), 11CFR 113.1 (g)(1)(i)(G) and 52 USC 30114 (b). This single set of expenditures to a popular Miami nightclub is over 200% of the expenditures the PAC has made to fund its claimed 'primary' get-out-the-vote and transportation initiatives (\$1,500).

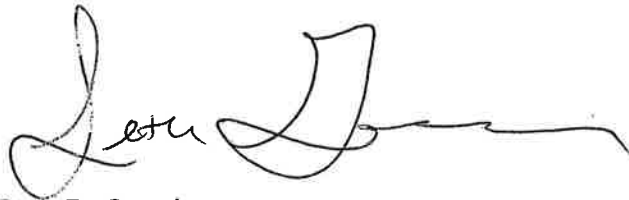
Lastly, I think it important to note that in the PAC's filings there is a recurring weekly payment made to [www.upwork.com](http://www.upwork.com). These payments range from \$100 to \$2,300 weekly, and total \$14,701 over the available reporting periods. Upworks.com is an online platform that connects independent contractors working in fields of Internet technology, digital development, online customer service, consulting, and sales/marketing fields to employers and provides a medium for payment upon completion of work. Payments are made to the website based on a selected contractor's work on an hourly or project basis, but neither the contractor nor their work is disclosed. The PAC's FEC filings fail to list either the recipient of or purpose for these recurring expenditures.

Given the preponderance of evidence, including: CEO Prall's reputation for and history with online extortions and with infringement on publicity rights, the PAC's willful and pervasive disregard for FEC statutes governing the use of candidate name, the blatantly false claims and false advertising used to solicit funds for the PAC, and the clear use of committee funds and accounts for personal use, I believe it reasonable to suspect that PAC funds distributed to [www.upworks.com](http://www.upworks.com) and to NHT Production LLC (totalling \$36,776) are, in fact, being recieved by Prall for personal or non-PAC related use. In my view, the exorbitant amounts of money paid to PAC CEO and associates, especially when viewed in relation to the less than 1% of PAC funds used to support its stated initiatives and objectives, presents a clear use of the PAC and PAC contributions by PAC administrators for personal use, in violation of 11CFR 113.1 (g) - Permitted and Prohibited Use of Campaign Accounts and 2USC 439 and 52 USC 30114- Use of Contributed Amounts for Certain Purposes.



**Conclusion**

Given the allegations and evidence provided within this complaint I feel it important to note that I am neither a donor to the PAC nor an agent of any Political Action Committee, candidate, or campaign. I have also not been aggrieved by or party in anyway to any of CEO Prall's other business ventures. I am simply a citizen of the United States residing in the State of Georgia interested in a fair political process and ethical business practice. In my opinion, part of the reason why tens of millions of Americans have already voted for Bernie Sanders for President is because of the candidate's stance on campaign finance reform and the need to end the corrupting influences of money in politics. I believe that the "Socially Responsible Government" PAC is more than irresponsibly disregarding current campaign finance law, but is acting as a predatory scam committee intent on abusing and exploiting campaign finance statutes to defraud well-meaning Americans trying to participate in the political process to strengthen our nation's democracy. This sort of "Scam PAC" is perhaps just what we have come to expect from a political system flooded with the corrupting influence of money, but I believe Sen. Sanders would agree that it is not the type of behavior that the American people and our government agencies should accept. I implore the FEC to investigate these claims and to hold accountable the responsible parties to the fullest extent of the law, so as to prevent future aberrations of this sort on our democratic process.



Seth R. Gunning  
June 22, 2016

STATE OF GEORGIA  
COUNTY OF Fulton

I do swear, under penalty of perjury, that this complaint was affirmed by the complainant under. Signed and sworn to before me this 22 day of June, 2016, at Alpharetta Georgia, by Seth Gunning





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# Free Voter ID Transportation Assistance Initiative

**Providing transportation for individuals who lack the necessary documents to vote is necessary to ensure all citizens have a voice in their government.**

Restrictive new voter ID laws threaten to disenfranchise potentially millions of voters by making it difficult for low income, elderly and disabled individuals to obtain the necessary documents and travel to the licensing office. While these new laws disproportionately impact minorities voting rights, this is a problem that affects people from all walks of life.

Feel the Bern will be sponsoring shuttle services for individuals who need to obtain the necessary documents and travel to the licensing office. These individuals will also be instructed on how to register to vote while they are obtaining their ID, if necessary and available. Help us to empower those disenfranchised by harsh

Appendix A



Appendix A

new voting laws by donating today and sharing this with your friends and family.

**WHAT WILL YOUR DONATION BE USED FOR?**

Volunteers will coordinate the charter buses and individual shuttle drivers which will transport individuals to government offices such as the social security office, DMV, Veterans Affairs and others. Elderly and disabled individuals will be assisted in reaching offices and facilities, completing forms, and registering to vote.

Effort and money will first be focused on areas with high numbers

of at-risk individuals when it comes to having the necessary documents to vote. Inner cities and low income areas tend to represent the highest concentration of individuals who lack ID.

**FUNDING GOAL**

**Our goal is to raise \$25,000 in donations over the next 10 months.** This money will go directly to chartering buses and paying for fuel to assist voters in obtaining the necessary ID to vote.

Share your love for Bernie, Share it with your friends.



Donate Now To This Initiative

DONATE NOW

Paid for by the Socially Responsible Government (formerly the Feel The Bern Committee) (www.feelbern.org) and not authorized by any candidate or candidate's committee. - feelbern.org © 2015 All Rights Reserved. This private political organization is not to be confused with Bernie Sander's Official campaign.

PRIVACY POLICY

Appendix A

# Appendix B



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Your contribution goes directly toward paying for training volunteers to knock on doors, make phone calls and spread the word about Bernie's movement. It also helps pay for our initiatives to help voters obtain the appropriate ID and transportation to voting facilities. **With your help we can take back our country.**

[Share on Facebook](#) [Share on Twitter](#)

Please Select an Option

Donation  Moneybombs

Please select the amount you would like to donate.

Like

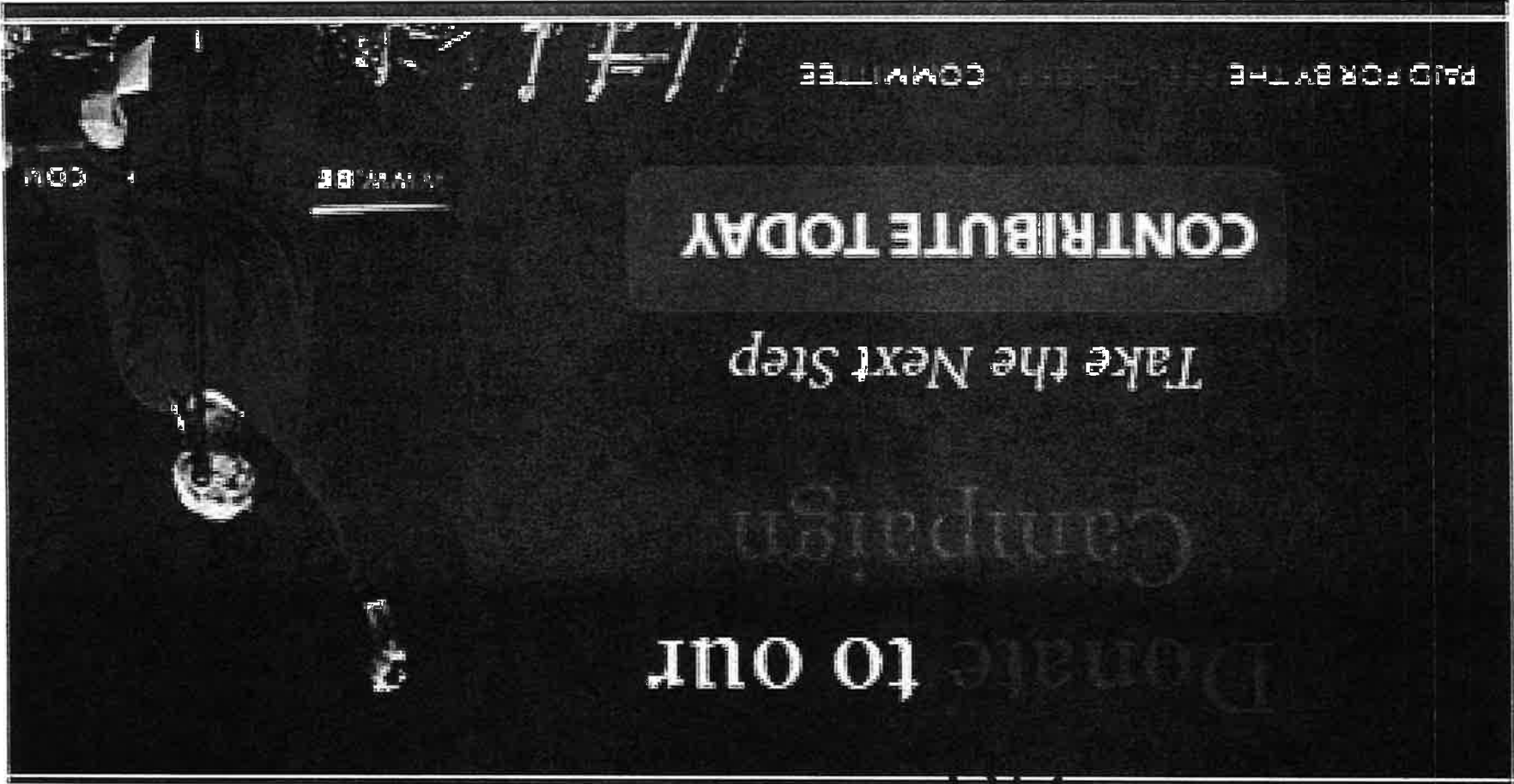
Comment

Share

FEELBERN.ORG/HELP-BERNIE-MA...

Help Bernie make history! If we work together, Bernie can sweep the primaries and win the presidential election. We're Team Bern, a group of volunteers who are working to help Bernie Sanders get elected president. We're constantly mobilizing...

# Help Bernie make history! - Feelbern



Donate to our

Take the Next Step

CONTRIBUTE TODAY

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COMMITTEE

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FEELBERN



# Appendix D

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## Free Voter Transportation Drive Initiative

**Providing free transportation to voting polls helps ensure that all eligible voters are given a voice in our nation's presidential election.**

Many of our fellow Progressives and Democrats who live in the inner city are at risk of not having a voice in our presidential elections through no fault of their own. We must ensure these individuals have access to voting polls by providing free transportation for those who need a ride. Feel the Bern is helping to organize shuttles and other transportation in large cities for those who cannot get to the polls on their own. **Please help us provide this assistance today by chipping in a few dollars and sharing this initiative with your friends and family.**

### **WHAT WILL YOUR DONATION BE USED FOR?**

The donations will be used primarily to charter buses for transportation to the voting polls during the US Presidential elections. The

Appendix D

money will also be used to reimburse volunteers who use their own cars to transport people for fuel. The geographic areas that will be selected for this initiative include major cities in political swing states such as

- Miami, FL
- Cleveland, OH
- Milwaukee WI
- Philadelphia, PA
- Des Moines, IA
- Las Vegas, NV
- Denver, CO
- Virginia Beach, VA

This is not an all inclusive list, and the planned cities may be adjusted to include states where the Presidential election is very close.

Volunteers will assist the elderly and those with disabilities to get on and off the bus, and assistance at the polling places.

### **FUNDING GOAL**

**Our goal is to raise \$25,000 in donations over the next 10 months.**

This money will go directly to chartering buses and paying for fuel to transport voters to Presidential election polls.

**Donate Now To This Initiative**

 DONATE NOW

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Paid for by the Socially Responsible Government (formerly the Feel The Bern Committee)

(www.feelbern.org) and not authorized by any candidate or candidate's committee. -

feelbern.org © 2015 All Rights Reserved. This private political organization is not to be confused with Bernie Sander's Official campaign.

PRIVACY POLICY





Appendix E

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[Get Involved](#) [Donate](#)

## Democratic Primary Voting Drive Initiative

**The first major challenge to electing Bernie Sanders as President will be the Democratic Primary election.**

The Democratic primaries begin in Iowa on February 1, 2016. It is imperative that Bernie supporters begin spreading the word about Bernie's platform through various media campaigns including online campaigns, TV and radio advertisements, and through word-of-mouth. **Please help us to spread the word and educate the primary voters by donating today, and sharing this page with your friends.**

### **WHAT WILL YOUR DONATION BE FOR?**

Feel the Bern has a three pronged media blitz planned for supporting Bernie's campaign:

- 1. Online Media Advertising** – Many of Bernie Sanders' supporters are young people that use the internet as the primary means of receiving news and information. This group is also known to have relatively low turnouts, so it is absolutely essential that the Bernie Sanders campaign reach

out to this group as much as possible to encourage participation in the Democratic Primaries. The funds raised will be used to purchase such things as advertisements on Google, Facebook, Twitter, as well as email campaigns. Our staff consists of two online advertising specialists who volunteer their time, so we will be able to deploy these advertising campaigns at a minimal cost.

Appendix E

2. **TV and Radio Advertising** – Targeted TV and radio advertising can be a very effective method of raising awareness around a candidate's campaign platform. Since this type of advertising tends to be the most expensive, but also the most effective at reaching large audiences, our plan will to target battleground states where Bernie Sanders' has limited exposure in order to bring out as many Bernie voters as possible.
3. **Word-of-Mouth** – Grassroots voter drives, door-to-door knocking, local events and phone calls are some of the most effective means of spreading the word with minimal cost. Volunteers in every state are standing by to begin these various initiatives. The funds raised will be used to pay for informational pamphlets, buttons, bumper stickers, t-shirts, and other campaign swag. In addition, funds will also be used for phone drives and for donations to other local Bernie support groups for door-to-door knocking drives.

### **FUNDING GOAL**

**Our goal is to raise \$20,000 in donations over the next 3 months.**

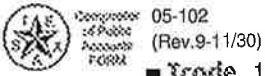
This money will go directly to promoting Bernie Sanders and educating voters on why he makes the best choice to lead this great nation. The advertising focus will be on Democratic primary elections areas where the campaign needs the most help.

# Appendix F

## Texas Franchise Tax Public Information Report

To be filed by Corporations, Limited Liability Companies (LLC) and Financial Institutions

This report **MUST** be signed and filed to satisfy franchise tax requirements



Code 13196 Franchise

Taxpayer number

3 2 0 4 3 3 4 0 8 8 7

Report year

2 0 1 5

You have certain rights under Chapter 552 and 559, Government Code, to review, request, and correct information we have on file about you. Contact us at (800) 252-1381 or (512) 463-4600.

Taxpayer name <b>CITIZENS INFORMATION ASSOCIATES, LLC</b>				Secretary of State (SOS) file number or Comptroller file number <b>0801366419</b>			
Mailing address <b>4301 W WILLIAM CANNON DR STE 150NO191</b>							
City <b>AUSTIN</b>		State <b>TX</b>		ZIP Code <b>78749</b>		Plus 4	

Blacken circle if there are currently no changes from previous year; if no information is displayed, complete the applicable information in Sections A, B and C.

Principal office

Principal place of business

*Please sign below!*

Officer, director and manager information is reported as of the date a Public Information Report is completed. The information is updated annually as part of the franchise tax report. There is no requirement or procedure for supplementing the information as officers, directors, or managers change throughout the year.



### SECTION A Name, title and mailing address of each officer, director or manager.

3204334088715

Name <b>KYLE PRALL</b>	Title <b>President</b>	Director <input type="radio"/> YES	Term expiration m m d d y y
Mailing address <b>7301 RANCH RD 620N STE 150</b>	City <b>AUSTIN</b>		State <b>TX</b> ZIP Code <b>78726</b>
Name <b>KYLE PRALL</b>	Title <b>DIRECTOR</b>	Director <input checked="" type="radio"/> YES	Term expiration m m d d y y
Mailing address <b>7301 RANCH RD 620N STE 150</b>	City <b>AUSTIN</b>		State <b>TX</b> ZIP Code <b>78726</b>
Name	Title	Director <input type="radio"/> YES	Term expiration m m d d y y
Mailing address	City		State ZIP Code

### SECTION B Enter the information required for each corporation or LLC, if any, in which this entity owns an interest of 10 percent or more.

Name of owned (subsidiary) corporation or limited liability company	State of formation	Texas SOS file number, if any	Percentage of ownership
Name of owned (subsidiary) corporation or limited liability company	State of formation	Texas SOS file number, if any	Percentage of ownership

### SECTION C Enter the information required for each corporation or LLC, if any, that owns an interest of 10 percent or more in this entity or limited liability company.

Name of owned (parent) corporation or limited liability company <b>Star Nine Ventures, Inc.</b>	State of formation <b>TX</b>	Texas SOS file number, if any <b>801033275</b>	Percentage of ownership <b>76.0</b>
--	---------------------------------	---	--

Registered agent and registered office currently on file. (see instructions if you need to make changes)

Agent: **C T CORPORATION SYSTEM**  Blacken circle if you need forms to change the registered agent or registered office information.

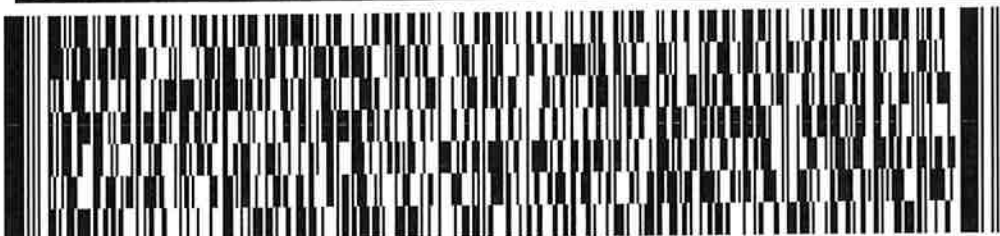
Office: **1999 BRYAN ST., STE. 900** City **DALLAS** State **TX** ZIP Code **75201**

The above information is required by Section 171.203 of the Tax Code for each corporation or limited liability company that files a Texas Franchise Tax Report. Use additional sheets for Sections A, B, and C, if necessary. The information will be available for public inspection.

I declare that the information in this document and any attachments is true and correct to the best of my knowledge and belief, as of the date below, and that a copy of this report has been mailed to each person named in this report who is an officer, director or manager and who is not currently employed by this, or a related, corporation or limited liability company.

Signature: **Joseph F Centrich** Title **Electronic** Date **06-03-2015** Area code and phone number **( 281 ) 210 - 0140**

### Texas Comptroller Official Use Only



VE/DE  PIR IND



# Appendix G

## IN THE COURT OF COMMON PLEAS LUCAS COUNTY, OHIO

Debra Lashaway,	)	Case No. 2012-6547
	)	
Holland, Ohio 43528,	)	Judge Hon. James D. Jensen
	)	
Phillip Kaplan	)	<b>AMENDED COMPLAINT,</b>
	)	<b>INCLUDING CLASS ACTION</b>
Toledo, Ohio 43620	)	<b>CLAIMS UNDER CIV. R. 23, PRAYER</b>
	)	<b>FOR LEGAL AND EQUITABLE</b>
Otha Randall	)	<b>RELIEF, WITH JURY DEMAND</b>
	)	<b>ENDORSED HEREON</b>
Toledo, OH 43604-831	)	
	)	Fritz Byers (0002337)
on behalf of themselves and all	)	414 N. Erie Street, 2 <sup>nd</sup> Floor
others similarly situated	)	Toledo, Ohio 43604
	)	Phone: 419-341-8013
<i>Plaintiffs,</i>	)	Fax: 419-241-4215
	)	Email: <a href="mailto:fritz@fritzbyers.com">fritz@fritzbyers.com</a>
-vs-	)	
	)	
ARTHUR D'ANTONIO III	)	Scott A. Ciolek (0082779)
Owner of JustMugshots.com	)	Ciolek Ltd. - Attorneys at Law
Owner of Mugshots.mobi	)	520 Madison Ave. Suite 820
	)	Toledo, Ohio 43604
Costa Mesa, CA 92626,	)	Tel: (419) 740-5935
	)	Fax: (866) 890-0419
	)	Email: <a href="mailto:scott@counselor.pro">scott@counselor.pro</a>
CITIZENS INFORMATION	)	
ASSOCIATES LLC	)	
Owner of BustedMugshots.com	)	Jon D. Richardson (0011833)
Owner of MugshotsOnline.com	)	414 N.Erie Street, 2 <sup>nd</sup> Floor
c/o Registered Agent: Joseph	)	Toledo, Ohio 43604
Centrich, Esq.	)	Phone: 419-241-6168
2002 Timberloch Place Suite 200	)	Fax: 419-241-4215
The Woodlands, Texas 77380,	)	Email: <a href="mailto:jonrich42@gmail.com">jonrich42@gmail.com</a>
	)	
	)	<i>Attorneys for Plaintiffs</i>

For their Amended Complaint, plaintiffs Debra Lashaway, Phillip Kaplan and Otha Randall, on behalf of themselves and all other members of the class of persons defined in this Amended Complaint, allege:

### OVERVIEW

1. This is an action for violation of Ohio's Right of Publicity statute, R.C. 2741.01, et seq., and Ohio's Pattern of Corrupt Activities Act, R.C. 2923.32. It is brought by the named plaintiffs on behalf of themselves and all other members of a state-wide class consisting of more than 250,000 persons, seeking redress for injuries caused by the unlawful conduct of the defendants, who have acted individually and collectively and whose actions have injured plaintiffs.
2. The defendants' conduct that is the subject of this civil action entails their wrongful appropriation, without consent, of the names, photographs, images, and likenesses of the plaintiffs for a commercial purpose that benefits only the defendants, and to extort money from the plaintiffs.
3. Specifically, defendants, acting individually and in concert, publish on various websites the names and photographs (commonly called "mugshots") of individuals who have had some involvement with the state's criminal judicial process, along with information purporting to be a statement of the allegations or charges brought against the individual.
4. The defendants, acting individually and in concert, then offer to remove this information from the website in exchange for a "removal" or "takedown" fee.

Timberloch Place, Suite 200, Woodlands, Texas, 77380. CIA operates the websites BustedMugshots.com and MugshotsOnline.com, and conducts business in the State of Ohio.

15. Defendant Jeremy Brooks is a resident of the state of Texas. He is sued in his individual capacity and also, based on information and belief, in his capacity as owner, officer, and employee of CIA and Star Nine.

16. Defendant Kyle Prall is a resident of the state of Texas. He is sued in his individual capacity and also, based on information and belief, in his capacity as owner, officer, and employee of CIA and Star Nine.

17. Defendant Ryan Russell is a resident of the state of Texas. He is sued in his individual capacity and also, based on information and belief, in his capacity as owner, officer, and employee of CIA and Star Nine.

18. Defendant Star Nine Ventures Inc. is a Texas Domestic For-Profit Corporation with its registered agent, Joseph Centrich, Esq., at 2002 Timberloch Place, Suite 200, Woodlands, Texas, 77380. Star Nine Ventures operates, promotes, and markets the websites BustedMugshots.com and MugshotsOnline.com, as well as others and conducts business in the State of Ohio.

19. On information and belief, defendant Gullermo Cuevas is a resident of the state of Florida. He is the owner and operator of a website with the URL FindMugshots.com, which does business in the state of Ohio.

20. On information and belief, Defendant Openbare Dienst Internationale, LLC operates a website with the URL mugshots.com. Its principal place of business

26. Plaintiffs' images have commercial value, as is shown by defendants profiting from the unlawful appropriation of those images for commercial purposes.
27. Defendants' respective websites, along with Plaintiffs' images, were indexed by Google.com, and the images appear under Google Images when a web search for Plaintiffs' name is conducted.
28. Each defendant's use of the plaintiffs' images is for a commercial purpose, among other purposes.
29. For example, Defendant CIA charges a monthly membership fee ranging between \$12.95 to \$19.95 to individuals who want to view the plaintiffs' photos that are displayed on BustedMugshots.com.
30. Each defendant operates one or more websites that are used to display the plaintiffs' images as part of a commercial enterprise.
31. The display by defendants of plaintiffs' images is intended, among other things, to subject the individual plaintiff to hatred, contempt, or ridicule, or to damage the plaintiff's personal or business repute, or to impair the plaintiff's credit.
32. Each defendant, acting on its own or in conjunction with one or more of the other defendants, makes available to plaintiffs a service to remove the plaintiff's image for a removal fee: By way of example, Defendant BustedMugshots charges an image and name removal fee of approximately \$178 for rush removal of the booking photos from its website.
33. Unless Defendants are enjoined from further use and publication of Plaintiffs' images and names, Plaintiffs will suffer further irreparable injury.

plaintiff to hatred, contempt, or ridicule, or to damage the plaintiff's personal or business repute, or to impair the plaintiff's credit.

### **Typicality**

38. The claims of the plaintiffs are typical of the claims of the other members of the putative class. The representative parties' claims arise from the same practice and course of conduct that give rise to the claims of the other class members, and the claims are based on the same legal theories.
39. The legal infringements suffered by the plaintiffs are typical of the legal infringements suffered by the other class members.
40. The plaintiffs' claims for statutory damages are typical of the statutory-damages claims of the other class members.

### **Adequacy of Representation**

41. The named plaintiffs will adequately fairly and adequately protect the interests of the class.
42. The named plaintiffs' interests are not antagonistic to, but rather are in unison with, the interests of other class members.
43. The named plaintiffs' counsel have substantial experience in handling complex litigation, including civil actions involving rights of privacy and publicity, false-light invasion of privacy, and related claims.

### **Superiority of Class Action**

44. The questions of law and questions of fact that are common to the class predominate over any questions affecting only individual members.



- b. Separate actions by individual members of the class against the defendants would create a risk of inconsistent or varying adjudications with respect to the class members, and incompatible standards of conduct for the defendants;
- c. The plaintiffs have no knowledge of any other claims currently pending specifically addressing the issues herein; and
- d. Separate prosecution of each individual claim against the defendants would create enormous difficulties and expense for the Court, the individual parties, and the public, requiring each individual claimant to establish liability on the part of the defendants, resulting in duplicative and unnecessary consumption of judicial and other resources.

**CAUSES OF ACTION FIRST CAUSE OF ACTION  
VIOLATION OF OHIO REVISED CODE SEC. 2741.01**

- 51. Plaintiffs reallege the factual allegations of paragraphs 1 through 48, above.
- 52. R.C. 2741.01(A) defines persona to mean an individual's name, voice, signature, photograph, image, likeness, or distinctive appearance, if any of these aspects have commercial value.
- 53. R.C. §2741.01(B) state that "Commercial purpose" means, in part, the use of or reference to an aspect of an individual's persona in any of the following manners:
- 54. On or in connection with a place, product, merchandise, goods, services, or other commercial activities not expressly exempted under this chapter;

**SECOND CAUSE OF ACTION Ohio RICO, R.C. 2923.31, et seq.**

61. Plaintiffs reallege the allegations of paragraphs 1 through 57, above.
62. Defendants have, with the purpose to obtain a valuable thing or a valuable benefit from plaintiffs, exposed or threatened to expose a matter tending to subject the plaintiff to hatred, contempt, or ridicule, or to damage the plaintiffs' personal or business repute, or to impair the plaintiffs' credit.
63. Defendants' conduct constitutes extortion in violation of R.C. 2905.11.
64. R.C. 2923.32 states that "No person employed by, or associated with, any enterprise shall conduct or participate in, directly or indirectly, the affairs of the enterprise through a pattern of corrupt activity."
65. "Corrupt activity" is defined to include conduct that constitutes a violation of, among other things, the Ohio extortion statute, R.C. 2905.11, a third-degree felony.
66. A "pattern of corrupt activity" under the Ohio RICO statute means two or more incidents of corrupt activity that are related to the affairs of the same enterprise, are not isolated, and are not so closely related to each other and connected in time and place that they constitute a single event.
67. Plaintiffs are entitled under R.C. 2923.34 to seek relief from any person whose conduct violates R.C. 2923.32, including divestiture of the defendant's interest in any enterprise, reasonable restrictions on the individual's future activities, dissolution of the enterprise, an award of treble damages, and an award of costs and reasonable attorney fees.

**Jury Demand**

The Plaintiffs demand a trial by jury on all issues so triable.

---

Scott Ciolek  
*One of Plaintiffs' Attorneys*

**CERTIFICATE OF SERVICE**

I hereby certify a copy of foregoing Amended Complaint was filed. Notice of this filing to all parties will be served by regular U.S. mail.

---

Scott Ciolek  
*One of Plaintiffs' Attorneys*

ARTHUR D'ANTONIO III  
Owner of JustMugshots.com  
Owner of Mugshots.mobi

Costa Mesa, CA 92626,

CITIZENS INFORMATION ASSOCIATES LLC  
Owner of BustedMugshots.com  
Owner of MugshotsOnline.com  
c/o Registered Agent: Joseph Centrich, Esq.  
2002 Timberloch Place Suite 200  
The Woodlands, Texas 77380,

GUILLERMO CUEVAS  
Owner of findmugshots.com

Weston, Florida 33326,

JEREMY BROOKS

Cedar Park, Texas 78613,

JUSTMUGSHOTS.COM CORP.  
Registered Agent:  
Virtual Post Solutions, Inc.  
340 S. Lemon Ave.  
Walnut, CA 91789,

▶ **Lcgm-llc.com**

The webmaster's name is **Johan Garcia** & the last known nameservers were set to:

**NS1.ATT-WEBSITES.COM**

**NS2.ATT-WEBSITES.COM**

This domain was bought at **Melbourne It, Ltd. D/b/a Internet Names Worldwide** on **02-mar-2016** updated on **02-mar-2016** and will expire on **02-mar-2017**.

☎ **+11 (786) 556-1479**

✉ **---@johangarcia.com**

Appendix #

*Appendix #*

**MICHIGAN DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS**  
**FILING ENDORSEMENT**

***This is to Certify that the ARTICLES OF ORGANIZATION (DOMESTIC L.L.C.)***

***for***  
***LCGM, LLC***

***ID NUMBER: E78951***

***received by facsimile transmission on February 3, 2016 is hereby endorsed.***

***Filed on February 4, 2016 by the Administrator.***

***This document is effective on the date filed, unless a subsequent effective date within 90 days after received date is stated in the document.***



***Sent by Facsimile Transmission***

***In testimony whereof, I have hereunto set my hand and affixed the Seal of the Department, in the City of Lansing, this 4th day of February, 2016.***

*Julia Dale*

***Julia Dale, Acting Director***  
***Corporations, Securities & Commercial Licensing Bureau***

Appendix I

OSCLJGD-700 (Rev. 01/14)

MICHIGAN DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS CORPORATIONS, SECURITIES & COMMERCIAL LICENSING BUREAU	
Date Received	(FOR BUREAU USE ONLY)
This document is effective on the date filed, unless a subsequent effective date within 90 days after received date is stated in the document.	
Name Sara Brautigam on behalf of InCorp Services, Inc.	
Address 2380 Corporate Circle · Suite 400	
City Henderson, NV	State NV
ZIP Code 89074-7739	
EFFECTIVE DATE:	

Document will be returned to the name and address you enter above. If left blank, document will be returned to the registered office.

ARTICLES OF ORGANIZATION

For use by Domestic Limited Liability Companies  
(Please read information and instructions on reverse side)

Pursuant to the provisions of Act 23, Public Acts of 1993, the undersigned executes the following Articles:

ARTICLE I

The name of the limited liability company is: NHT Productions, LLC

ARTICLE II

The purpose or purposes for which the limited liability company is formed is to engage in any activity within the purposes for which a limited liability company may be formed under the Limited Liability Company Act of Michigan.

ARTICLE III

The duration of the limited liability company if other than perpetual is: Perpetual

ARTICLE IV

- The name of the resident agent at the registered office is: InCorp Services, Inc.
- The street address of the location of the registered office is:  
2285 S. Michigan Road Eaton Rapids, Michigan 48827  
(Street Address) (City) (Zip Code)
- The mailing address of the registered office if different than above:  
PO Box 266 Eaton Rapids, Michigan 48827  
(P.O. Box or Street Address) (City) (Zip Code)

ARTICLE V (Insert any desired additional provision authorized by the Act; attach additional pages if needed.)

Signed this 19th day of January, 2016

By [Signature] (Signature(s) of Organizer(s))

Joseph E. Centrich (Type or Print Name(s) of Organizer(s))

Appendix J

**STATE OF WYOMING \* SECRETARY OF STATE  
ED MURRAY  
BUSINESS DIVISION**

2020 Carey Avenue, Cheyenne, WY 82002-0020

Phone 307-777-7311 · Fax 307-777-5339

Website: <http://soswy.state.wy.us> · Email: [business@wyo.gov](mailto:business@wyo.gov)

### Filing Information



Please note that this form **CANNOT** be submitted in place of your Annual Report.

Name	<b>DMF Marketing Solutions, LLC</b>		
Filing ID	<b>2016-000705387</b>		
Type	Limited Liability Company	Status	Active

#### General Information

Old Name		Sub Status	Current
Fictitious Name		Standing - Tax	Good
		Standing - RA	Good
Sub Type		Standing - Other	Good
Formed in	Wyoming	Filing Date	02/03/2016 9:16 AM
Term of Duration	Perpetual	Delayed Effective Date	
		Inactive Date	

#### Principal Address

2002 Timberloch Pl Ste 550 A  
The Woodlands, TX 77380

#### Mailing Address

2002 Timberloch Pl Ste 550 A  
The Woodlands, TX 77380

#### Registered Agent Address

Incorp Services, Inc.  
1910 Thomes Ave  
Cheyenne, WY 82001

#### Parties

Type	Name / Organization / Address
Organizer	Joseph Centrich
Organizer	Joseph Centrich

#### Notes

Date	Recorded By	Note
------	-------------	------

#### Annual Report History

Num	Status	Date	Year	Tax
-----	--------	------	------	-----

#### Amendment History