

RECEIVED  
ELECTION  
COMMISSION

Paul Sapperstein

JAN 31 2 48 PM

Alexandria, Virginia 22315

OFFICE OF GENERAL  
COUNSEL

January 31, 2017

Lisa J. Stevenson, Acting General Counsel  
Office of General Counsel  
Federal Election Commission  
999 E Street, N.W.  
Washington, DC 20463

MUR # 7212

Ms. Stevenson,

I write today to file a complaint against the campaign committee Hoosiers for Jim Pfaff. This committee was organized for the candidacy of James R. Pfaff, for the 2016 election to the United States House of Representatives in the 9th congressional district of Indiana. Mr. Pfaff currently resides at Bloomington, IN, 47401.

Mr. Pfaff offered me, the complainant, the position of Deputy Campaign Manager on December 27, 2015 for a monthly compensation in the amount of \$3,500 (see Attachment 1). I have also attached the email communication with the campaign manager, Jadan Horyn to which the offer letter was attached (See Attachment 2). My employment began on January 18, 2016 in Smithville, Indiana. My work included scheduling and assisting Mr. Pfaff, making fundraising calls, submitting meeting requests, conducting donor research and correspondence, attending local Republican party meetings, among other duties.

I provided Mr. Pfaff with a detailed expense report on February 16, 2016 of campaign related expenses going back to October 2015, when I served in a voluntary capacity on the campaign, totaling \$639.68 (see Attachment 3). In October 2015, I was instructed to purchase pocket constitutions for the campaign at my expense and was told that I would be reimbursed by the campaign. I've attached the email communication showing this and highlighted the relevant portion (see Attachment 4). Mr. Pfaff never acknowledged the February 16 report or offered partial payment, even though he asked me to put meals on my personal credit card promising to repay me. One instance being the charge on February 2, 2016 to Golden China Restaurant in the amount of \$49.92.

After Mr. Pfaff failed to pay me the agreed upon monthly compensation or reimbursements, I left the campaign and moved back to Alexandria, Virginia on February 19, 2016. Despite continuous attempts to receive payment over the past year, Mr. Pfaff has not responded to any communications regarding payment. Attached is a letter personally handed to Mr. Pfaff on August 25, 2016 (see Attachment 5) as well as the email I sent him with the letter attached (see Attachment 6). This letter was accompanied by the original offer letter and expense report. His failure to respond or pay the \$4,139.68 that I am owed (\$3,500 for my month of services to the campaign and \$639.68 in itemized reimbursable expenses) has necessitated this official complaint.

Mr. Pfaff's failure to pay and his actions regarding this situation are in violation of multiple FEC laws. First, Mr. Pfaff has not reported my uncompensated services as debt as required by the FEC in 11 CFR 104.11(b) and 11 CFR 116.6. Additionally, if Mr. Pfaff believes I am not owed compensation, he has not properly reported to the FEC my requests for payment as required in 11 CFR 116.10(a).

Finally, I have not consented to or signed any statement agreeing for my uncompensated services to be converted to volunteer work, nor have I agreed to a settlement or forgiveness of this debt therefore I am entitled to payment for my services rendered.

I appreciate the General Counsel's office appropriately addressing this violation.

Sincerely,



Paul Sapperstein

State of DC, County of USA

Signed and sworn to before me this 30 day of Jan, 2017, at 10:37 AM

by Paul Sapperstein

Sarah Hubal, Signature of Notary Public

SEAL

Sarah Hubal, Print Name of Notary Public

Notary Public, State of DC  
My commission expires: 1/14/2021



Attachment 1



Hoosiers for Jim Pfaff

PO Box 270, Smithville, IN  
47458

December 27, 2015

Paul,

It is my pleasure to offer you the position of Deputy Campaign Manager for my campaign for Congress in the 9th Congressional District of Indiana.

Your start date is January 18, 2015. Compensation shall be \$3,500 per month, which will include housing and Mileage. We look forward to having you on the team. Sincerely,

Jim Pfaff  
Candidat  
e

## Attachment 2



Paul Sapperstein



## Offer Letter

9 messages

Jadan Horyn <jadan@jimpfaff.com>  
To: Paul Sapperstein

Sat, Jan 2, 2016 at 6:35 PM

Paul,

Please Review

Regards,

Jadan

PaulOfferLetter (1).pdf  
56K

Paul Sapperstein  
To: Jadan Horyn <jadan@jimpfaff.com>

Sat, Jan 2, 2016 at 6:51 PM

Jadan,

Thank you for the offer. I look forward to joining the team! I believe a base salary of \$4,000 would be acceptable given my experience and commitment to this campaign. Please let me know if this is agreeable.

Best,  
Paul

Sent from my iPhone

> On Jan 2, 2016, at 6:35 PM, Jadan Horyn <jadan@jimpfaff.com> wrote:  
>  
> Paul,  
>  
> Please Review  
>  
> Regards,  
>  
> Jadan  
> <PaulOfferLetter (1).pdf>

Jadan@jimpfaff.con <jadan@jimpfaff.com>  
To: Paul Sapperstein

Sat, Jan 2, 2016 at 6:56 PM

Paul,

Would \$3,250 work for you?

Sent from my iPhone  
[Quoted text hidden]

Paul Sapperstein  
To: "Jadan@jimpfaff.con" <jadan@jimpfaff.com>

Sat, Jan 2, 2016 at 7:11 PM

Jadan,

1/28/2017

Gmail - Offer Letter

What about \$3,750?

Thanks,  
Paul

Sent from my iPhone

[Quoted text hidden]

---

Jadan@jimpfaff.com <jadan@jimpfaff.com>  
To: Paul Sapperstein >

Sat, Jan 2, 2016 at 7:16 PM

Paul,

Would \$3,500 work for you?

Sent from my iPhone  
[Quoted text hidden]

---

Paul Sapperstein  
To: "Jadan@jimpfaff.com" <jadan@jimpfaff.com>

Sat, Jan 2, 2016 at 7:29 PM

Jadan,

Yes, \$3,500 will work. I look forward to moving to Indiana and working on the campaign!

Best,  
Paul

Sent from my iPhone

[Quoted text hidden]

---

Jadan@jimpfaff.com <jadan@jimpfaff.com>  
To: Paul Sapperstein >

Sat, Jan 2, 2016 at 7:30 PM

I'll send over an updated offer letter

Sent from my iPhone  
[Quoted text hidden]

---

Jadan Horyn <jadan@jimpfaff.com>  
To: Paul Sapperstein

Sat, Jan 2, 2016 at 7:44 PM

Paul,

Please see updated offer letter.

Jadan  
[Quoted text hidden]

---

 PaulOfferLetter (2).pdf  
56K

---

Paul Sapperstein < >  
To: Jadan Horyn <jadan@jimpfaff.com>

Sat, Jan 2, 2016 at 7:55 PM

Thanks Jadan,

I'm excited to accept the position and begin work on the 18th. I look forward to joining the team!



January-Feb15

\$639.<sup>68</sup>

To: paul@jimpfaff.com  
 From: paul@jimpfaff.com  
 Dates: Oct 12, 2015 to Feb 6, 2016

## Fuel/Mileage - \$141.17







DATE	MERCHANT	COMMENT	TOTAL
Jan 17, 2016	Bf Foods	\$20	\$20.80
Jan 17, 2016	Pilot #454	\$13	\$13.73
Jan 18, 2016	Circle K	\$18	\$18.12
Jan 26, 2016	Fuel	\$18	\$18.83
Jan 29, 2016	Marathon Gas	\$18	\$18.38
Feb 2, 2016	Smithfield Food Market	\$18	\$18.90
Feb 3, 2016	Franklin Food Mart	\$16	\$16.13
Feb 6, 2016	On The Way	\$18	\$18.48
			<b>\$141.17</b>

## Meals - \$117.08









DATE	MERCHANT	COMMENT	TOTAL
Feb 5, 2016	Au Bon Pain	\$4	\$4.77
Feb 5, 2016	Ballard Vending	\$3	\$3.90
Feb 5, 2016	In Gov Center	\$5	\$5.88
Feb 5, 2016	Starbucks	\$2	\$2.65
Feb 5, 2016	Texas Roadhouse	\$60	\$60.24
Feb 6, 2016	Burger King	\$8	\$8.10
Feb 6, 2016	Fairfax Market	\$18	\$18.15
Feb 6, 2016	Hardees	\$1	\$1.73
Feb 6, 2016	Taco Bell	\$11	\$11.66
			<b>\$117.08</b>

## Other - \$324.08

DATE	MERCHANT	COMMENT	TOTAL
Oct 12, 2015	Constitutions	\$247	\$247.50
Jan 26, 2016	Ups Stores	\$4 Printing	\$4.13
			<b>\$324.08</b>

DATE	MERCHANT	COMMENT	TOTAL
 Jan 26, 2016	Walmart	 \$19.00 Clipboards	\$4.15
 Jan 29, 2016	Bulk Marathon	 \$12.00	\$18.38
 Feb 2, 2016	Golden China Restaurant	 \$115.00	\$49.92
			<b>\$324.08</b>

Uncategorized - \$57.35

DATE	MERCHANT	COMMENT	TOTAL
 Jan 20, 2016	La Charreada	 \$10.03	\$10.03
 Jan 21, 2016	Office Depot	 \$29.94	\$29.94
 Jan 22, 2016	Meljer #204	 \$12.63	\$12.63
 Jan 28, 2016	Paul Sapperstein	 \$4.75	\$4.75
			<b>\$57.35</b>




#### Policy Violations

^ Potential duplicated expense

#### Notes

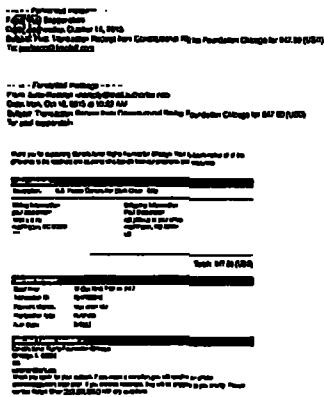
+ Receipt not verified by SmartScan

#### Report History & Comments

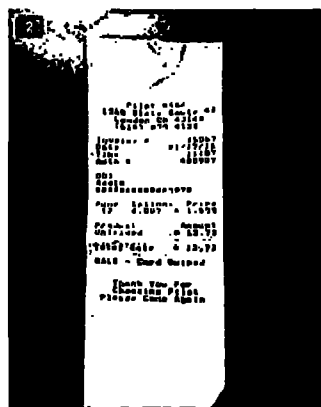
-  Feb 16, 2016 6:50 AM PDT  
You closed this report.
-  Feb 16, 2016 6:50 AM PDT  
You submitted this report (automatically closed due to submit-only policy) to you
-  Feb 16, 2016 6:48 AM PDT  
This report was created.

#### Receipt Thumbnails

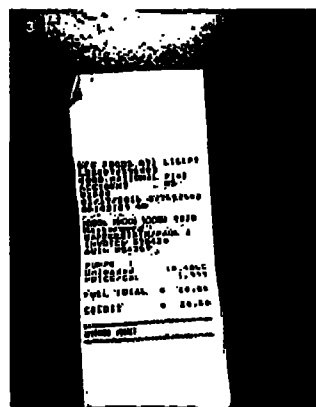




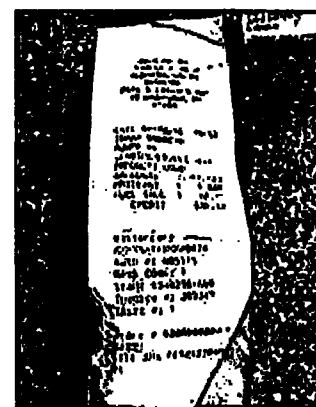
Date: Oct 12, 2015  
Merchant: Constructions  
Total: \$247.50  
Category: Other



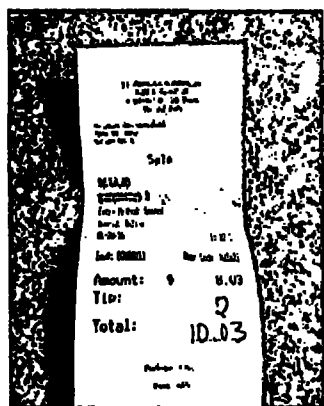
Date: Jan 17, 2016  
Merchant: Pilot #454  
Total: \$13.73  
Category: Fuel/Mileage



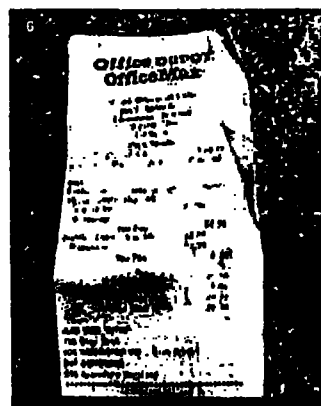
Date: Jan 17, 2016  
Merchant: Bf Foods  
Total: \$20.80  
Category: Fuel/Mileage



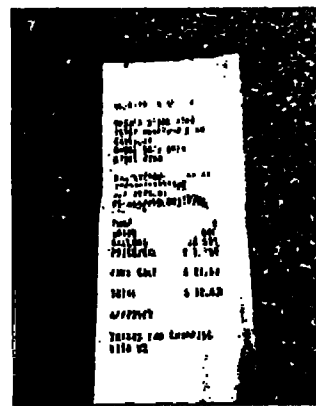
Date: Jan 18, 2016  
Merchant: Circle K  
Total: \$18.12  
Category: Fuel/Mileage



Date: Jan 20, 2016  
Merchant: La Charreada  
Total: \$10.03



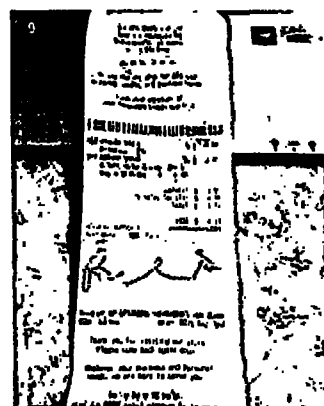
Date: Jan 21, 2016  
Merchant: Office Depot  
Total: \$29.94



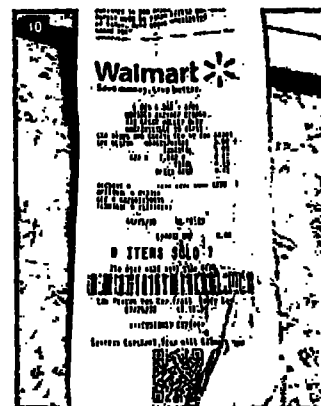
Date: Jan 22, 2016  
Merchant: Meijer #204  
Total: \$12.63



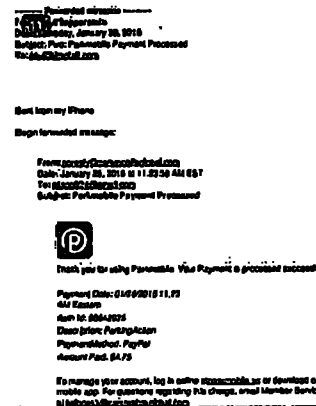
Date: Jan 26, 2016  
Merchant: Fuel  
Total: \$18.63  
Category: Fuel/Mileage



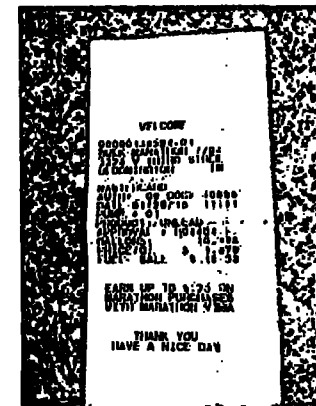
Date: Jan 26, 2016  
Merchant: Ups Stores  
Total: \$4.13  
Category: Other  
Comment: Printing



Date: Jan 26, 2016  
Merchant: Walmart  
Total: \$4.15  
Category: Other  
Comment: Clipboards



Date: Jan 28, 2016  
Merchant: Paul Sapperstein  
Total: \$4.75



Date: Jan 29, 2016  
Merchant: Marathon Gas  
Total: \$18.38  
Category: Fuel/Mileage

**Date:** Jan 29, 2016  
**Merchant:** Bulk Marathon  
**Total:** \$18.38  
**Category:** Other

**Date:** Feb 2, 2016  
**Merchant:** Smithfield Food Market  
**Total:** \$18.90  
**Category:** Fuel/Mileage

**Date:** Feb 2, 2016  
**Merchant:** Golden China Restaurant  
**Total:** \$49.92  
**Category:** Other

**Date:** Feb 3, 2016  
**Merchant:** Franklin Food Mart  
**Total:** \$16.13  
**Category:** Fuel/Mileage

**Date:** Feb 5, 2016  
**Merchant:** Au Bon Pain  
**Total:** \$4.77  
**Category:** Meals

**Date:** Feb 5, 2016  
**Merchant:** In Gov Center  
**Total:** \$5.88  
**Category:** Meals

**Date:** Feb 5, 2018  
**Merchant:** Starbucks  
**Total:** \$2.65  
**Category:** Meals

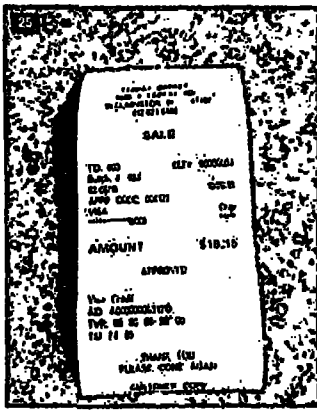
**Date:** Feb 5, 2016  
**Merchant:** Ballard Vending  
**Total:** \$3.90  
**Category:** Meals

**Date:** Feb 5, 2016  
**Merchant:** Texas Roadhouse  
**Total:** \$60.24  
**Category:** Meals

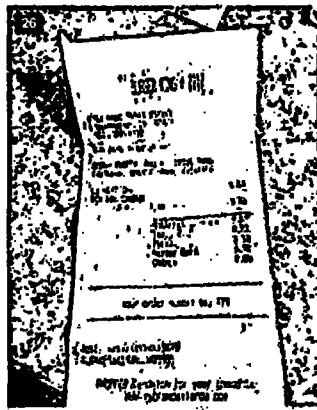
**Date:** Feb 6, 2016  
**Merchant:** Taco Bell  
**Total:** \$11.66  
**Category:** Meals

**Date:** Feb 6, 2016  
**Merchant:** On The Way  
**Total:** \$16.48  
**Category:** Fuel/Mileage

**Date:** Feb 6, 2016  
**Merchant:** Hardees  
**Total:** \$1.73  
**Category:** Meals



Date: Feb 6, 2016  
Merchant: Fairfax Market  
Total: \$18.15  
Category: Meals



Date: Feb 6, 2016  
Merchant: Burger King  
Total: \$8.10  
Category: Meals

## Attachments

----- Forwarded message -----

From: **Paul Sapperstein**

Date: Wednesday, October 14, 2015

Subject: Fwd: Transaction Receipt from Constitutional Rights Foundation Chicago for 247.50 (USD)

To: [paulsapp@jimpfaff.com](mailto:paulsapp@jimpfaff.com)

----- Forwarded message -----

From: **Auto-Receipt** <[noreply@mail.authorize.net](mailto:noreply@mail.authorize.net)>

Date: Mon, Oct 12, 2015 at 10:22 AM

Subject: Transaction Receipt from Constitutional Rights Foundation Chicago for 247.50 (USD)

To: paul sapperstein

Thank you for supporting Constitutional Rights Foundation Chicago. Your support makes all of the difference to the teachers and students who benefit from our programs and resources.

**Order Information**

Description: U.S. Pocket Constitution (Bulk Order - 500)

**Billing Information**

paul sapperstein

washington, DC 20002

US

**Shipping Information**

Paul Sapperstein

will pick up at your office

washington, DC 20004

US

**Total: 247.50 (USD)**

**Payment Information**

Date/Time: 12-Oct-2015 7:22:41 PDT

Transaction ID: 7612905046

Payment Method: Visa

Transaction Type: Purchase

Auth Code: 012653

**Merchant Contact Information**

Constitutional Rights Foundation Chicago

Chicago, IL 60606

US

[coleman@crfc.org](mailto:coleman@crfc.org)

Thank you again for your support. If you made a donation, you will receive an official acknowledgement letter soon. If you ordered materials, they will be shipped to you shortly. Please contact Margie Chan ([312-663-9057](tel:312-663-9057)) with any questions.

## Attachment 4



Paul Sapperstein

&gt;

**Did we order constitutions?**

14 messages

Jim Pfaff <j >  
 To: Jadan Horyn >, Paul Sappersrein > Sun, Oct 11, 2015 at 4:57 AM

--  
 --  
 Jim Pfaff  
 Candidate, Hoosiers for Jim Pfaff

Phone:  
 Email:  
 Website: <http://www.jimpfaff.com>  
 Skype: jim.pfaff  
 Address: P.O. Box 5823, Bloomington, IN 47407

IMPORTANT: The contents of this email and any attachments are confidential. They are intended for the named recipient(s) only. If you have received this email by mistake, please notify the sender immediately and do not disclose the contents to anyone or make copies thereof.

Jadan Horyn Sun, Oct 11, 2015 at 12:12 PM  
 To: Jim Pfaff <jimpfaff@gmail.com>, Myra Pfaff  
 Cc: Paul Sappersrein >, Naysa Woomer >, Sean Langille

Correct us if we are wrong Carlyle was point on that?

If not let's do it ASAP.

Paul can you do it and send Jim the bill for reimbursement?

Jim, can we have a 10pm conference call with Dave Shuey?

Also please view the notes from Paul from debate prep.

Myra, please write out ALL the questions on 3x5 note cards. We will decide which to use.

Jim did you give me website access?

Paul can you schedule tweets and fb posts advertising the debate time, location and Jim's readiness for the issues.

3 tweets/FB posts a day.

Jim thoughts on paying \$100 to boost a FB post or ad to get the word out to the voters?

Naysa, please schedule a fundraising committee conference call.

Sean, can you find the interviews of Jim with Tony Kurtz in Indy and his interview with OAN and push them out on Jim social media?

All, please be retweeting/sharing news stories Jim is in.

Paul, please send reminder of action items from the last week for me to follow-up on/do.

150561c8700c342a

1/28/2017

Gmail - Did we order constitutions?

Myra, can you call the debate number and see if we can 1. Record the debate 2. Have a table for Jim in the hallway of the debate. I can email you the number of need be.

Everyone, thank you for your hard work I know it's been a crazy week but let's get Jim to and over debate day!

Sent from my iPhone

[Quoted text hidden]

Paul Sapperstein

Sun, Oct 11, 2015 at 1:44 PM

To: Jadan Horyn

Cc: Jim Pfaff

, Myra Pfaff

>, Naysa Woomer

>, Sean

Langille

If Carlyle hasn't, I can order the constitutions. I just need to know a address to ship them and how many are needed. They need to be ordered in the next few hours to ensure delivery.

Jadan, here are your action items from the this weeks notes:

- call the organizer to see if there can be a table at the back
- Follow up with Jim and Myra and make sure they have the campaign flyers printed
- figure out what will go on the labels for the constitutions

I can schedule social media but I need access to the Facebook and Twitter accounts and some idea of content.

Sent from my iPhone

[Quoted text hidden]

Jim Pfaff

Sun, Oct 11, 2015 at 6:25 PM

To: Paul Sapperstein

Jadan Horyn <

>

Cc: Myra Pfaff <

>, Naysa Woomer <

>, Sean Langille <

>

**Order them Paul**

[Quoted text hidden]

Jadan Horyn

Sun, Oct 11, 2015 at 7:02 PM

To: Jim Pfaff

Cc: Paul Sapperstein <

>, Myra Pfaff <

>, Naysa Woomer

< >, Sean Langille <

>

Jim he needs an address ASAP!

Sent from my iPhone

[Quoted text hidden]

Jim Pfaff

Sun, Oct 11, 2015 at 7:26 PM

To: Jadan Horyn <

>

Cc: Paul Sapperstein <

>, Myra Pfaff <

>, Naysa Woomer

< >, Sean Langille <

>

3600 E Cleve Butcher Rd Bloomington IN 47401

[Quoted text hidden]

Jim Pfaff

Sun, Oct 11, 2015 at 9:34 PM

To: Jadan Horyn

>

1/28/2017

Gmail - Did we order constitutions?

Cc: Paul Sapperstein < , Sean Langille  
Myra Pfaff < , Naysa Woomer  
>, Dave Shuee < >

I want to personally thank everyone for your work and patience in all this process as we reconstitute some of our campaign responsibilities and actions. And thank you for your patience with me in my belated and missing follow ups.

Answers below to the list of questions

**Also, please start to use jim@jimpfaff.com for all campaign items for me. I am finding that I am losing them in my gmail missing timely follow up. Thanks**

Please follow up with Myra's items on the phone with her

Jim

Correct us if we are wrong Carlyle was point on that?  
RESOLVED

If not let's do it ASAP.

Paul can you do it and send Jim the bill for reimbursement?

Jim, can we have a 10pm conference call with Dave Shuey?  
==Let's get Shuee scheduled for a call Monday

Also please view the notes from Paul from debate prep.  
==Paul.....please resend

Myra, please write out ALL the questions on 3x5 note cards. We will decide which to use.  
==Resend to Myra and me

Jim did you give me website access?  
==Completed

Paul can you schedule tweets and fb posts advertising the debate time, location and Jim's readiness for the issues.

3 tweets/FB posts a day.

Jim thoughts on paying \$100 to boost a FB post or ad to get the word out to the voters?  
==I'm willing to do this

Naysa, please schedule a fundraising committee conference call.  
==Start to use jim@jimpfaff.com for my items

Sean, can you find the interviews of Jim with Tony Kurtz in Indy and his interview with OAN and push them out on Jim social media?

All, please be retweeting/sharing news stories Jim is in.

Paul, please send reminder of action items from the last week for me to follow-up on/do.

Myra, can you call the debate number and see if we can 1. Record the debate 2. Have a table for Jim in the hallway of the debate. I can email you the number of need be.

Everyone, thank you for your hard work I know it's been a crazy week but let's get Jim to and over debate day!



**Jim Pfaff**

Candidate, Hoosiers for Jim Pfaff



Phone: 812-329-0218

Email: jim@jimpfaff.com

Website: http://www.jimpfaff.com

Skype: jim.pfaff

Address: P.O. Box 5823, Bloomington, IN 47407

Attachment 5

Paul Sapperstein

Alexandria, VA 22315

August 25, 2016


Jim,

THIS DOCUMENT IS A COPY OF THE ORIGINAL DOCUMENT  
This letter and attached documentation is to request the \$4,139.68 owed to me from my work for Hoosiers for Jim Pfaff and then Friends of Jim Pfaff. Attached is a detailed expense report for the time I was in Indiana working on your campaign. These charges include travel to official campaign events, constitutions ordered in October 2015, as well as meals I was promised would be reimbursed. All of this accruing on my credit card while I received no compensation for my work.

I believe it is important to note I am the only person to have quit a job to work for your campaign. Believing I would be compensated (offer letter attached), I continued to work well past multiple days that payment was promised.

Please provide payment to the address above and notify me once sent. I have waited over six months for you to do the right thing to pay this debt, believing you would honor your word. However, if a payment in the amount of \$4,139.68 is not sent by September 25th, one month from today, I will notify the State of Indiana Election Commission of this matter.

Sincerely,

  
Paul Sapperstein





Paul Sapperstein

&gt;

**Attached**

2 messages

Paul Sapperstein <  
To: Jim Pfaff <

Thu, Aug 25, 2016 at 4:17 PM

Jim,

Attached is the documentation I gave you as you left. I wanted to make sure you had an electronic copy as well. Please let me know if you have any questions.

Paul

Paul Sapperstein

 Paul Sapperstein--Pfaff.pdf  
729K

Paul Sapperstein <  
To: Jim Pfaff  
Cc: Myra Kinser Pfaff <

Thu, Sep 15, 2016 at 8:58 AM

Jim,

You owe me this money. It's in writing and signed by you. I don't understand what the hold up is. Please let me know when payment will be sent.

Paul

Preview attachment Paul Sapperstein--Pfaff.pdf



Paul Sapperstein--Pfaff.pdf  
728 KB

[Quoted text hidden]