

**BEFORE THE FEDERAL ELECTION COMMISSION**

**In the Matter of**

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**MUR 7226**

**Pawlowski2016.com,  
Lisa Pawlowski, Treasurer**

**DECLARATION**

1. This Declaration is voluntarily made and sworn to by me the undersigned, **LISA PAWLOWSKI**. I reside in Allentown, Pennsylvania. I am the original and current treasurer of Pawlowski2016.com (“the Committee”) which is the principal campaign committee of Ed Pawlowski who was briefly a candidate for the United States Senate in the 2016 election cycle in Pennsylvania. His campaign for this office began in April 2015 and ended on or about July 6, 2015. This DECLARATION supplements and augments a previous declaration (re: RR 16L-10) that I submitted to the Federal Election Commission (“FEC”) on June 30, 2016, and responds to a letter my counsel received from the FEC’s Office of General Counsel dated June 20, 2019.

2. Within about 10 days after June 20, 2019, my counsel submitted copies of documents that I located after a search of Committee records and FEC filings by the Committee. (The document copies were provided informally to the FEC’s Office of General Counsel.) The documents pertain to the rental of a motor vehicle by the Committee in June 2015. They disclose that the vehicle was rented from Precision Motor Cars, Inc., a PA corporation with its principal place of business in Allentown, PA. Precision submitted an invoice for \$265 to the Committee on or about June 30, 2015, which was paid in full by

the Committee on or about July 20, 2015. The vehicle was used by candidate Ed Pawlowski and Mike Fleck, who was then the campaign manager, for a brief (24 hours) round trip from Allentown to New York City to engage in campaign activity. To the best of my knowledge and information, the vehicle was returned to Precision within 24 hours after the rental period began.

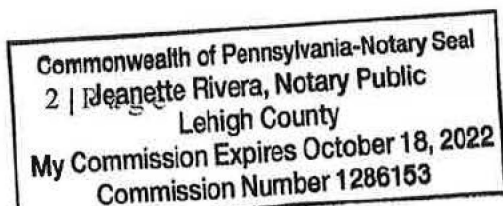
3. To the best of my knowledge, information and recollection, there was another motor vehicle rental for round-trip campaign travel between Allentown and Pittsburgh in either May or June 2015. As I recall, Ed Pawlowski and Mike Fleck made this trip together, and its duration was no more than a single overnight, parts of two calendar days. As explained more fully in the DECLARATION submitted to the FEC by Ed Pawloski, Fleck personally made the arrangements to obtain the use of this vehicle for this trip. After a recent search of Committee records, I was unable to locate any vendor invoice, rental contract, or other documentation as to the amount payable for this rental. I also did not find any documentation that the Committee paid any rental vehicle vendor (or any other person) for this rental. Because I am the Committee treasurer, my expectation would have been that Fleck, as campaign manager and as the person who obtained the rental vehicle for this trip, would provide me with any documentation as to the amount payable by the Committee for this campaign trip. To the best of my knowledge, information and belief no such documentation was given to me by Fleck or any other person on his behalf.

4. To the best of my knowledge, information, belief and recollection, there were no other vehicle rental contracts or informal agreements for the loan of any vehicle to the Committee for campaign travel between April and July 6, 2015. As Committee treasurer and as a frequent volunteer to otherwise assist with Committee activity, I used a family owned (or leased) vehicle to make local trips in the Allentown area in connection with campaign matters. Ed Pawlowski and I did not invoice the Committee for these trips.

*Lisa Pawlowski*

**LISA PAWLOWSKI**

Sworn to and subscribed before me on this  
9<sup>th</sup> day of August, 2019.



*Jeanette Rivera* Notary Public

## BEFORE THE FEDERAL ELECTION COMMISSION

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## DECLARATION

1. This Declaration is voluntarily made and sworn to by me the undersigned, ED PAWLOWSKI. I was the elected Mayor of Allentown, Pennsylvania, from 2006 to 2018. I filed with the Federal Election Commission ("FEC") as a candidate for the U.S. Senate (PA) on April 17, 2015, and my principal campaign committee is Pawlowski2016.com (FEC ID# C00576520). I ended my U.S. Senate campaign on or about July 3, 2015. I currently reside in Danbury, Connecticut.

2. During the period from March 2015 until on or about July 2, 2015, Mike Fleck was my campaign manager. In that time period he was owner and chief executive officer of H Street Strategies, an LLC registered in PA, with the business address of 840 Hamilton Street, Suite 321, Allentown, PA 18101. On or about July 2, 2015, the committee treasurer and I abruptly terminated his employment for good cause. Campaign finance reports and related documents filed with the FEC by my principal campaign committee (including legal counsel) explain that Fleck's termination was the direct result of his conversion of campaign funds (held in a committee bank account) to his personal use in the amount of \$76,500. This unlawful conversion occurred by means of a committee account bank check signed by Fleck, and made payable to H Street Strategies in the amount of \$76,500. This check purported to be a campaign expenditure, but the expenditure was never authorized by the campaign treasurer or by me, either before or after Fleck signed the check. Fleck unlawfully presented this check for payment, and it was honored by the drawee bank on or about July 2, 2015.

3. The terms of Fleck's brief employment by my Senate campaign were never defined or described in a written or oral contract. Fleck presented me with a contract proposal for political consulting

and campaign management services about six weeks before I filed with the FEC as a Senate candidate. His proposal included compensation at \$15,000 per month. I immediately balked at that amount, having recalled that the compensation level for consulting and management services he and his firm provided to my PA gubernatorial, state-wide campaign (2014 election cycle) was \$9,000 per month. We had several further discussions about compensation levels, but could not agree on an amount before I ended my campaign on July 3, 2015.

4. Fleck and I did reach an informal agreement (not reduced to writing) that the Senate campaign committee would pay Fleck's firm \$1,000 per month in rent for the use of office space, equipment and facilities (e.g. copy machine, phone, internet access, use of conference room) within his office suite at 840 Hamilton Street in Allentown. The committee paid \$3,000 in rent on June 10, 2015, to H Street Strategies in compliance with this informal contract. No other rental payments were made to Fleck's firm given that the campaign ended on July 3, 2015.

5. Among his campaign services, Fleck arranged for the use of motor vehicles that he and I used for travel on two out-of-town day trips to conduct campaign business: one to New York City and the other to Pittsburgh, PA. The vehicle used for the NYC trip was obtained from Precision Motor Cars, Inc., an Allentown business, and Precision issued an invoice to the committee that was paid in full and timely. (Use was in June 2015 and payment was made on or about July 15, 2015.) The vehicle used for the Pittsburgh trip was obtained by Fleck, but he did not disclose to me the terms on which the vehicle was made available. I do recall him saying something to the effect that he put the rental charge on his credit card, and I also recall telling him that the vehicle was not a comfortable ride for me. I never learned whether or not an invoice was presented to the campaign by the vendor, or whether the vendor was paid for our campaign use of the vehicle. I relied upon him to handle the payment details as he did in the past during my gubernatorial campaign.

6. To the best of my recollection, the motor vehicles I used for local travel in the Allentown area to engage in Senate campaign business, were vehicles owned/leased by me, volunteers or other campaign workers, and/or my wife, Lisa Pawlowski, who remains the treasurer of record for my Senate campaign

committee. To the best of my knowledge, information and belief, I never used any motor vehicle for local campaign travel (nor for campaign travel described in paragraph 5) that was owned by any foreign national or by any foreign corporation. Any allegations by Fleck or anyone else to the contrary are totally unsubstantiated and without merit. As Mayor of Allentown during the Senate campaign period (April to July 3, 2015) I did have access to a City-owned vehicle for official business and for travel between my residence and City Hall. While I do not have any specific recollections of this, it is possible that I used a City vehicle at the close of the regular work day to travel from City Hall to a local campaign event and then home. Or from home to a local campaign event and then to City Hall at the start regular work day. If such travel did occur, it would have been very incidental, and de minimus as compared to the hours and miles traveled when using a City vehicle for official and lawful personal purposes.

  
ED PAWLOWSKI

Sworn to and subscribed before me on this 15 day of August, 2019.

Notary Public

