

(603) 563-7420 Fax (603) 563-7490 (800) 726-4871 Fax (800) 726-3076

FEDERAL ELECTION COMMISSION COMPLAINT

January 16, 2018

MUR# 7315

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

To the Office of General Counsel:

RESPONDENT:

Rebecca Sanchez, Treasurer Allen Weh for Senate C/O CSI Aviation 3700 Rio Grande Boulevard Suite 1 Albuquerque, NM 87107

COMPLAINANT:

Stephen C. Meyers, President SCM Associates, Inc. 1283 Main Street P.O. Box 254 Dublin, NH 03444

REASON FOR COMPLAINT: Failure of the RESPONDENT to file accurate Federal Election Commission Campaign Finance Reports about debts owed by the committee. Failure of the RESPONDENT to take Federal Election Commission approved steps to clear campaign debt.

FACTS:

SCM Associates, Inc. is a NH corporation that provides direct response services to Republican campaigns and organizations. During the 2014 campaign, we were engaged by the RESPONDENT to run a direct mail fundraising program for Allen Weh for Senate. After the campaign ended unsuccessfully, the RESPONDENT owed the COMPLAINANT \$4,982.13. This amount has increased to \$7,217.85 with interest included. The RESPODENT has refused to

GENERAL COUNSEL

FEDERAL ELECTION COMMISSION COMPLAINT

RESPONDENT: Rebecca Sanchez, Treasurer - Allen Weh for Senate COMPLAINANT: Stephen C. Meyers, President - SCM Associates, Inc.

January 16, 2017

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settle this debt and has not reported the debt on its Federal Election Commission campaign finance reports. This is why we are filing a complaint that the RESPONDENT has failed to file accurate reports or taken Federal Election Commission approved steps to clear this debt.

Attached are the following Exhibits:

Exhibit 1 – SCM Statement showing the outstanding balance

Exhibit 2 – Email dated 10-14-17 from Robert Perea, Deputy Campaign Manager for Finance and agent of the Respondent requesting the housefile mailing for 10-27-14.

Exhibit 3 – SCM Associates Report showing the mailing raised \$10,804 for the campaign (based on numbers provided by the campaign.

Exhibit 4 – A sample of the mailing (Weh HF Annual Appeal #14-1025).

Sincerely,

Stephen C. Meyers. President

SCM Associates, Inc.



FEDERAL ELECTION COMMISSION COMPLAINT



1283 Main Street • Post Office Box 264 • Dublin, NH 03444-0254

(603) 563-7420 Fax (603) 563-7490 (800) 726-4871 Fax (800) 726-3076

Statement

TO: Allen Weh for Senate

PO Box 26086

Albuquerque, NM 87125-6086

Statement Date:

Jan 23, 2018

Ē	<u>Date</u>	Date Due	Reference	<u>Paid</u>	<u>Description</u>	<u>Amount</u>	Balance
12/3	31/16	1/30/17	2016 Balance		- 1-	7,217.85	7,217.85
1/1/	/17	1/31/17	FC 1-1-17			108.27	7,326.12
1/31		3/2/17	FC 1-31-17			108.54	7,434.66
B/1/		3/1/17	FC 3-1-17			111.52	
1/1/		4/1/17	FC 4-1-17			113.19	7,659:37
Þ/1/	/17	5/1/17	FC 5-1-17			114.89	7,774.26
			·				
L			·		1 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2	Total	7,774.26

0-30	31-60	61-90	Over 90 days
0.00	0.00	0.00	7,774.26

his is a STATEMENT. It shows unpaid invoices on this date.

In general, our payment terms are that all list-rental, production, and postage costs must be pre-paid by the client prior to the mail date. Pre-payment is made based on an estimated invoice. Following the mailing, a final invoice is issued and any remaining balance must be paid upon receipt. 1.5% finance charge on overdue balances after 30 days.

Stephen Meyers

From:

Robert Perea <robert@allenweh.com>

Sent: To: Tuesday, October 14, 2014 3:07 PM

Subject:

Stephen Meyers Final Mail

Stephen,

Final mail -

- 1 Do not do any more McCain mail packages.
- 2 Please mail the House File 1 more time around the 27th.

Thanks,

Robert

Robert R. Perea
Deputy Campaign Manager for Finance

www.AllenWeh.com



SCANTES ASSOCIATES				UPDATED	· ·	eh for AAIL SU	Senate JMMARY STHROUG	Allen Weh for Senate DIRECT MAIL SUMMARY 11/14/14 (RESULTS THROUGH 11/14/14)							
PROJECTIJOB#	DATE	QTY	RESP	GROSS	LIST COST	MAIL	MAIL COST	NET	AVG	%	CPN	RPN	NPN	\$dO	ROS
							_								
14 DONORS			~						-						
Lapsed Donors 14-0167	02/28/14	1.443	108' \$	10,137.00		<u>ه</u>	1,907.80	8,229.20	\$ 93.86	7.48%	\$ 1.32	\$ 7.02	\$ 5.70	\$ 0.19	\$ 5.31
HF Courage 14-0332	04/18/14	1.960	92, 8			 (0)	3,705.93	1,880.07	\$ 60.72	ļ į	1.89	\$ 2.85	\$ 0.96	တ	5 1.51
HF Primary Match 14-0442	06/06/14	1,249	200 \$		1	ا دود	2,514.97	32,139.03	\$ 173.27	16.01%	\$ 2.01	\$ 27.75	\$ 25.73	\$ 0.07	\$ 13.78
HF July 14-0560	07/22/14	2,607	249. \$	25,303.00		(a)	3,793.81	21,509.19	\$ 101.62	9.55%	\$ 1.46	\$ 9.71	\$ 8.25	\$ 0.15	\$ 6.67
HF August 14-0659	08/27/14	2,125	276 \$			S	2,757.65	\$ 27,131.35	\$ 108.29	12.99%	\$ 1.30	\$ 14.07	\$ 12.77	\$ 0.09	\$ 10.84
HF 7 Weeks 14-0754	09/17/14	2,491	288 \$	32,247.00		s	3,093.70	29,153.30	\$_111.97	11.56%	\$ 1.24	\$ 12.95	\$ 11.70	\$ 0.10	\$ 10,42
HF Washington 14-0853	10/02/14	2,950	255, \$			ø	_	\$ 22,617.74	\$ 103.43	8.64%	\$ 1.27	\$ 8.94	\$ 7.67	\$ 0.14	\$ 7.02
HF Time 14-0919	10/17/14	3,616	159 \$	14,998.00		69	3,707.73	\$ 11,290.27	\$ 94.33	4,40%	\$ 1.03	\$ 4,15	\$ 3.12	\$ 0.25	\$ 4,05
HF Final Appeal 14-1025	10/27/14	3,860	1201 \$	10,804.00		္တ	3,982.13	\$ 6,821.87	\$ 90.03	3.11%	\$ 1.03	\$ 2.80	\$ 1.77	\$ 0.37	\$ 2.71
		j		- 1			—# 			- -	1		1		
Miscellaneous			214.8	24,848.50				\$ 24,848.50	1	· †	†		1	† 	
Z014 DONORS TOTAL		22,301	1961	1961 \$ 214,840.50		\$ 29	29,219.98	\$ 185,620.52	\$ 109.56	8.79%	\$ 1.31	\$ 9.63	\$ 8.32	\$0.14	\$ 7.35
14 PROSPECTING	7 	†					-					!			
NM Prospect 14-0202	02/28/14	14,198	275. \$	20,471.00	\$ 910.78	s	9,971.51	\$ 9,588.71	\$ 74.44	1.94%	\$ 0.77	\$ 1.44	\$ 0.68	\$ 0.53	\$ 1.88
NM Prospect 2 14-0278	03/31/14	18,509	226 \$		\$ 2,678.87		11,846.41	4,658.72	\$ 84.88	1.22%	\$ 0.78	\$ 1.04	\$ 0.25	\$ 0.76	\$ 1.32
June Prospect 14-0505	06/20/14	12,402	390. \$		\$ 762.24	i i	8,583,41	\$ 23,104.35	\$ 83.21	3.14%	\$ 0.75	\$ 2.62	\$ 1.86	\$ 0.29	\$ 3.47
July NM Prospect 14-0561	07/30/14	18,292	358.8	34,405.00	\$ 2,374.30	69	10,652.98	\$ 21,377.72	\$ 96.10	1.96%	\$ 0.71	5 1.88	\$ 1.17	\$ 0.38	\$ 2.64
Romney Appeal 14-0647	08/14/14	7,010	155 \$	11,507.00		s	. :	\$ 5,451.75	\$ 74.24	. !	98.0	1.64	\$ 0.78	\$ 0.53	`
McCain Appeal 14-0566	08/22/14	8,474	82	1	\$ 1,159.26	8	-+	\$ 6,202,14	69		80.8	\$ 1.57	\$ 0.73	S 0.53	- 1
1	09/12/14	22,512	303 \$	1	8	1		18,800.08	, e	1.35%	Ī	- 1	- (S	- 1
54	09/16/14	16,214	146: \$	١	\$ 1,853.92	9	10,442.77 \$	(2,880.69)	.	. %06.0	\$ 0.76			φ¦	S 0.77
McCain Drop 2 14-0783	09/22/14	18,679	106 8		S	9	11,001.57	(3,262.84)	\$ 96.39	0.57%	\$ 0.72	\$ 0.55	_1	<u>ه</u>	\$ 0.76
July NM Prospect RO 1 14-0784	09/25/14	16,285	316. \$	29,258.00	\$ 2,951.73	so.	12,071.78	\$ 14,234.49	\$ 92.59	1.94%	\$ 0.92	\$ 1.80	\$ 0.87	\$ 0.51	\$ 1.95
Wiscollandin		1	֓֞֝֞֜֜֞֜֜֝֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֡֓֓֡֓֓֡֓֓֡֓֡֓֡֓֡֓֡֓	7 647 50			+	03.479.4	1		+	-			
mscellaneous			3	Ì				00/104/			†		1	1	
2014 PROSPECTING TOTAL		152,575	2455 \$	2455 \$ 222,797.50	\$18,796.61		99,078.96	\$ 104,921.93	\$ 90.75	1.61% \$ 0.77	٠., ١	\$ 1.46	\$ 0.69	\$0.53	\$ 1.89
		-					- 1		1 9						!
OTAL DIRECT MAIL		174.876	4,415	4,416 \$ 437,638.00	\$18,796.61	\$ 128	128,298.94	\$ 290,542.45	\$ 99.10	2.53%	\$ 0.84	\$ 2.50	S 1.66	50.34	5 2.98

CPN = Cost Per Name RPN = Return Per Name NPN = Net Per Name CP\$ = Cost Per \$ Raised ROI = Return Per \$ Invested Page 1 of 6



www.AllenWeh.com

Post Office Box 26086, Albuquerque, NM 87125-6086

October 24, 2014

Mr. Stephen C. Meyers SCM Associates, Inc PO Box 254 Dublin, NH 03444-0254

Dear Stephen,

We are at the moment of truth.

We're within striking distance of defeating first term Democratic Senator Tom Udall. There are just 11 days to go. He is wrong for New Mexico and victory is within reach.

Please write your "Allen Weh for Senate" check for at least \$1,000 right away.

I am technically still the underdog. But, in reality, I would rather be where I am today than where he is today. Tom Udall, a creature of Washington with a 94% compliance record for President Obama's policies, is waging a losing battle with New Mexico voters who don't like what they are seeing in Washington. It's becoming readily apparent they feel compelled to change the people they send there.

Sixteen years in Washington has given Incumbent Tom Udall a ton of connections and a bunch of tricks up his sleeve. He hopes to get re-elected by simply scaring voters about their Social Security checks. What does that tell you about Tom Udall? It tells me he is a desperate Washington career politician.

When I start to tick off Udall's 1-o-n-g list of bad votes . . . a deciding vote for ObamaCare that stripped \$716 Billion out of Medicare, being opposed to a Balanced Budget Amendment, support for animals on the Endangered Species Act that are harming the livelihoods of our farmers and ranchers, the Middle East in a cauldron of conflict and he says "our pathway of diplomacy is a good one;" New Mexico's voters understandably shake their heads in disgust.

He is supposed to be representing us? So why is he so bound-and-determined to support President Obama virtually all the time even when it's very clear that Obama is wrong? He needs to represent New Mexicans, not pledge allegiance to his party first.

Stephen, you've been with me from the start. I am grateful for your financial support with our campaign. Now we must run a gauntlet of desperate Udall attack ads in the final 11 days to win.

With your last-minute critical help of \$1,000, \$1,500, or even \$2,500, I will be able to sustain our TV and radio advertising which is expensive, but absolutely necessary to win. When we win this race, I promise you I will go to Washington and shake things up. I am going to serve the state and country I love one more time . . . let's finish strong, and win!



Allen Weh for Senate Post Office Box 26086 Albuquerque, NM 87125-6086

PERSONAL REPLY TO Allen Weh



SENATE

PLEASE MAKE CHECK PAYABLE TO: Allen Weh for Senate Post Office Box 26086 Albuquerque, NM 87125-6086

You are going to win Allen, and I'm going to help you.

We will finish strong and beat left wing Reactionary Tom Udall. Here is my last-minute, emergency contribution to help make this happen.

\$1,000

18044443242

\$1,500

\$2,500

Other \$___

Dublin, NH 03444-0254

Mr. Stephen C. Meyers SCM Associates, Inc.

3877

(12345-14M09A)

PO Box 254

Get the letest campaign news - please provide your email: ..

CONTRIBUTE IMMEDIATELY ONLINE:	www.AllenWeh.com
use the back of this form to ma	ke your contribution by credit car

CREDIT CARD CONTRIBUTION	•		- 7			
Please charge my contribution of \$ to my credit card.						
□:MasterCard □ Visa	American Express	□ Discover	j			
This contribution is made on a personal credit or debit card for which I have the legal obligation to pay, and is not made on a corporate or business entity card.						
Account Number		Expiration Date				
Card Security Number : for MC/Visa/Discovor, 3-digit number appears on the algnoture strip on the back of the eard. For AAEXi 4-digit security number appears on front above account number.						
Name as it appears on your card						
Signature			٠			
E-Mai) (Please provide your e-mail for a confirmation of your credit card contribution.)						
Paid for by Allen Weh for Senate						

Federal law requires us to use our best efforts received and report the name, mailing address, occupation and name of employer of individuals whose contributions exceed \$200 in an election cycle. Please complete the following information:

Name

Mailing Address

Employer

Occupation

Contributions to Allen Weh for Senate are not tax deductible as charitable contributions for federal income tax purposes. Contributions are prohibited from corporations and foreign nationals (unless a green card holder). Contributions made in the name of another are prohibited. The maximum an individual may contribute is \$2,600 per election (\$2,600 for the Primary Election and \$2,600 for the General Election).