Case Number MUR 7691

MUR # 7691

## FEDERAL ELECTIONS COMMISSION

In Re: FRIENDS OF DON BEYER (C00555888), THE VOICES OF THE AMERICAN FEDERATION OF GOVERNMENT EMPLOYEES SUPER PAC Super PAC (C00512293) and NATIONAL ACTIVE AND RETIRED FEDERAL EMPLOYEES ASSOCIATION POLITICAL ACTION COM (NARFE-PAC) (C00091561)

Respondents

DENERAL COUNSEL

REPLY TO FEC RE: FORMAL COMPLAINT

# From Major Mike Webb, Complainant

Major Mike Webb 955 S Columbus Street, #426 Arlington, VA 22204

Phone: (856) 220-1354

Email: Mike.Webb84@gmail.com

Complainant

## REPLY TO FEC RE: FORMAL VERIFIED COMPLAINT

- By letter, dated February 5, 2020, the Federal Elections Commission (FEC) acknowledged receipt of the Formal Complaint, alleging violations of the Federal Election Campaign Act of 1971, as amended, in the above referenced case on February 3, 2020.
- 2. By letter, dated February 7, 2020, the FEC advised Complainant acknowledged receipt of violations regarding Respondents Friends of Don Beyer (C00555888) and the Voices of American Federation of Government Employees Super PAC (C00512293), but indicated that there were no allegations referenced in the Formal Complaint regarding Respondent National Active and Retired Federal Employees Association Political Action Committee (NARFE-PAC) (C00091561), to which, now, Complainant replies.
- 3. As in evidence at Exhibit A, for the two-year reporting period of 2019 to 2020, as of February 28, 2020, and updated last on January 28, 2020, the FEC Form 1, Statement of Organization, for Respondent Voices of American Federation of Government Employees Super PAC (C00512293), discloses that this political action committee (PAC), is a separate segregated fund, which is connected organization, and that it is located at 80 F

Street, NW, Washington, DC 20001, with a contact email of: <a href="Kevin@Voicesofafge.com">Kevin@Voicesofafge.com</a>, having been filed with the FEC on August 21, 2012, with Everett Kelley, Assistant Treasurer, serving as Custodian of Records and Jeffrey David Cox, serving as Treasurer, and Kevin LaDana, Accountant, listed as the Designated Agent, and all reported as working at the same address as the organization.

- Amalgamated Bank, located at 275 Seventh Avenue, New York, New York 10001 is disclosed at the Bank/Depository.
- 5. However, the *Statement of Organization*, despite acknowledging connection to a labor organization, provides the answer "NONE" for its affiliated committees/organizations.
- 6. As of February 28, 2020, on the FEC website, Respondent NARFE-PAC (C00091561) discloses no information, for the two-year reporting period 2019 to 2020, regarding a current Statement of Organization, as in evidence at Exhibit B.
- 7. As in evidence at Exhibit C, the last Statements of Organization filed with the FEC by Respondent NARFE-PAC were for the two-year reporting period 2017 to 2018, which, as in evidence at Exhibit D, list the organization address as 606 N. Washington Street, Alexandria, Virginia 22314, distinct from the address for Respondent Voices of American Federation of Government Employees Super PAC (C00512293).
- 8. A Boolean Query on the FEC website, as in evidence at Exhibit E, provides no other obvious labor organizations, other than NARFE, with whom Respondent Voices of American Federation of Government Employees Super PAC (C00512293), may be affiliated.
- 9. At a minimum, it is evident that, with receipts totaling \$850,000.00, expenditures totaling \$530,567.29 and cash on hand totaling \$359,693.19 for the 2019 year-end report, Respondent Voices of American Federation of Government Employees Super PAC (C00512293), as in evidence at Exhibit F, with a current Statement of Organization; however, Respondent NARFE-PAC (C00091561), with receipts totaling \$1,085,388.64, expenditures totaling \$878,524.07 and cash on hand totaling \$1,218,292.25 for the 2019 year-end report, as in Evidence at Exhibit G, has yet to update its Statement of Organization for the current reporting period, and it is apparently associated with the labor organization, NARFE, or for retired and federal employees other than the one that is most popularly known.

## VERIFICATION

All the above statements are true to the best of my knowledge. I understand that a false statement in this Verified Complaint may subject me to penalties of perjury.

# TABLE OF EXHIBITS

<u>Exhibit</u>	<u>Description</u>
<b>A.</b>	Current FEC Form 1, Statement of Organization, for the Voices of American Federation of Government Employees Super PAC (C00512293)
В.	Nonexistent FEC Form 1, Statement of Organization, for NARFE-PAC (C00091561), the Two-Year Reporting Period 2019 to 2020
C.	Query Results for the Statements of Organization for NARFE-PAC (C00091561), for the Two-Year Reporting Period 2017 to 2018
D.	Statements of Organization for NARFE-PAC (C00091561), for the Two-Year Reporting Period 2017 to 2018
Е.	Boolean Query Results for "Federal Employees"
F.	2019 Year-End Report for Voices of American Federation of Government Employees Super PAC (C00512293)
G.	2019 Year-End report for NARFE-PAC (C00091561)

In Re: FRIENDS OF DON BEYER (C00555888), THE VOICES OF THE AMERICAN FEDERATION OF GOVERNMENT EMPLOYEES SUPER PAC Super PAC (C00512293) and NATIONAL ACTIVE AND RETIRED FEDERAL EMPLOYEES ASSOCIATION POLITICAL ACTION COM (NARFE-PAC) (C00091561)

Reply to FEC on Formal Complaint re: Unlawful Super PAC Contributions



#### **FEDERAL ELECTION COMMISSION**

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## FEC FORM 1

#### STATEMENT OF ORGANIZATION

#### FILING FEC-1373679

#### 1. The Voices of the American Federation of Government Employees

No. F. Moret, NW. Washington, TK in no. 4 Forum Konana University Specient

#### 2. Date: 08/31/3013

1917 Committee ID4 Corpussy, This committee is a separate segregated fund. Its connected organization is a Labor Department

#### Affiliated Committees/Organizations

SOST

#### Custodian of Records:

Mr. Dyrect Kelles Sold Street, NV Washington, DC 2000 Title: And Transacri Phone of participations

#### Treasurer:

Mr Jetter Emaltin No Fatort, NV Wathingto, IX greet Title, Trossore Place 4 2 2 2 2 2 2 2

#### Designated Agent(s):

Keste Laftens No F. Stroet, NW Washington, DK great Take Assummant Phone 4 (2020) for 1272

#### Banks or Depositories

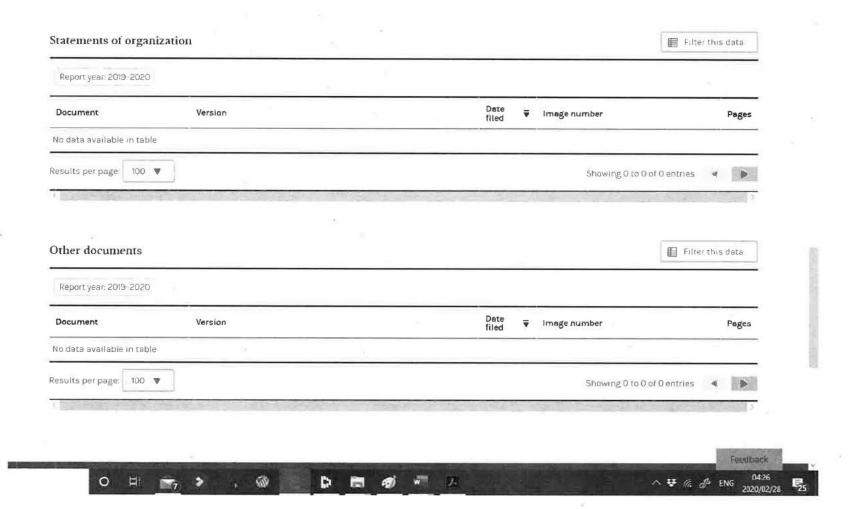
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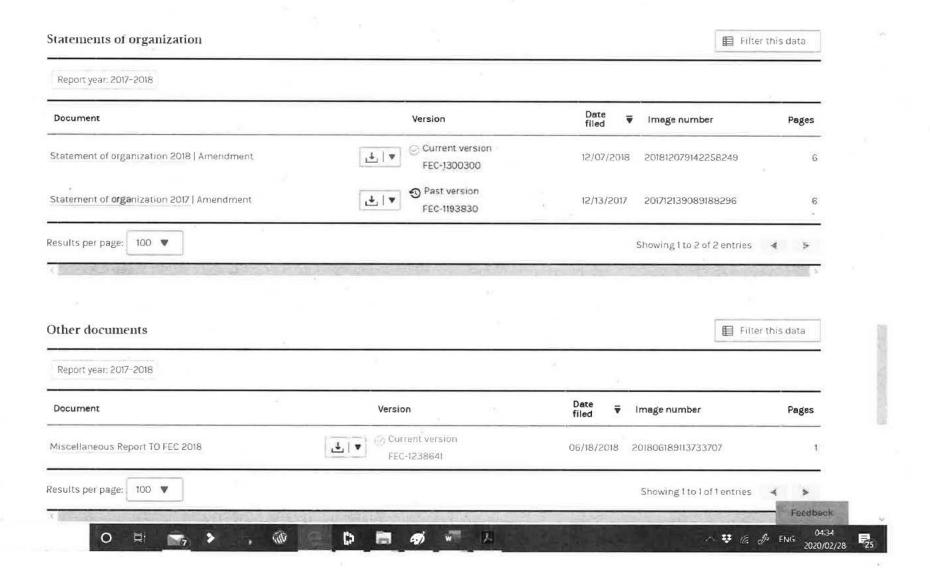
Signed: Mr. Jeffrey David Cox Date Signed: 01/28/2020 Official Committee URL: <u>EstingVoicesofafge.com</u>

#### (End FEC FORM 1)

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# **Exhibit C**



#### **FEDERAL ELECTION COMMISSION**

THE LABOUR CONVINCENCE OF THE LABOUR STREET

#### FEC FORM 1

#### STATEMENT OF ORGANIZATION

#### FILING FEC-1300300

1. NATIONAL ACTIVE AND RETIRED FEDERAL EMPLOYEES ASSOCIATION POLITICAL ACTION COM (NARFE-PAC)

MANAGEMANDENCHAN SPREET
MENINDRA TA SEMENT
FREE SOUTHER BEFORE TARROUGH OFF OF

NOTE: Pmail address is different than previously reported

#### 2 Date: 12/13/2017

§ 15) Vocasities [17] Constant [17] Ones of the committee is a separate segregated fund. Its connected regardation is a Membership Organization. In addition, this committee is a Lobbyiat Registrant P.W.

#### Affiliated Committees/Organizations

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#### Custodian of Records:

Kathon E. Herolog 666 N. Wachington M. Melantina, VA 2214 Francis and VA 2214 Francis Colonia, VA 2214 Physics — 1214 (1975)

#### Treasurer:

Karbon II. Hersing N. C. X. Westington in Grandens, Vogerse and II. Tries Soft, NORN INCLOSING A Proper 4

#### Designated Agent(s):

East, Open to 6 N Washington to Accusation, Virginia 2014 Teles Indiana Associate Phone 2 (2014) 124

#### Banks or Depositories

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PEDMONT WEALTH ADVISORY GOZO WARLEGATE DRIVE SUITE 100 BURNDON, VIQUES 20180

Signed: Kathryn E. Hensley Date Signed: 12/07/2018 Official Committee URL: HHD: | www.narfe.org

#### (End FEC FORM 1)

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#### **FEDERAL ELECTION COMMISSION**

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#### FEC FORM 1

#### STATEMENT OF ORGANIZATION

#### FILING FEC-1300300

#### 1. NATIONAL ACTIVE AND RETIRED FEDERAL EMPLOYEES ASSOCIATION POLITICAL ACTION COM (NARFE-PAC)

OLA NORTH WASHINGTON STREET MENUSPRAN VA GEOLOPIA Email: Settings that sing appendix the seg-

#### NOTE: Email address is different than previously reported

#### 3. Date: 12/13/2017

FFC Committee [114] County to This committee is a separate agreegated fund. Its connected organization is a Membership Organization. In addition, this committee is a Lobbyist Registrant P.W.

#### Affiliated Committees/Organizations

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#### Custodian of Records:

Kathon F. Hender oan N. Washington N. Areandria V. Lada Tale NATIL SERVING R. Photo 4 June 16 p. 144

#### Treasurer:

Artestantes con N. Washington Sc Veranchia V.- tra un Ald Tale NATI SCERVING SCERE Phone of Control Sciences

#### Designated Agent(s):

Reso Aprel Osco A, Washington St Accumenta, Virginia Lingua Tatle, Pocifical Associate Physics of Linking Court

#### Banks or Depositories

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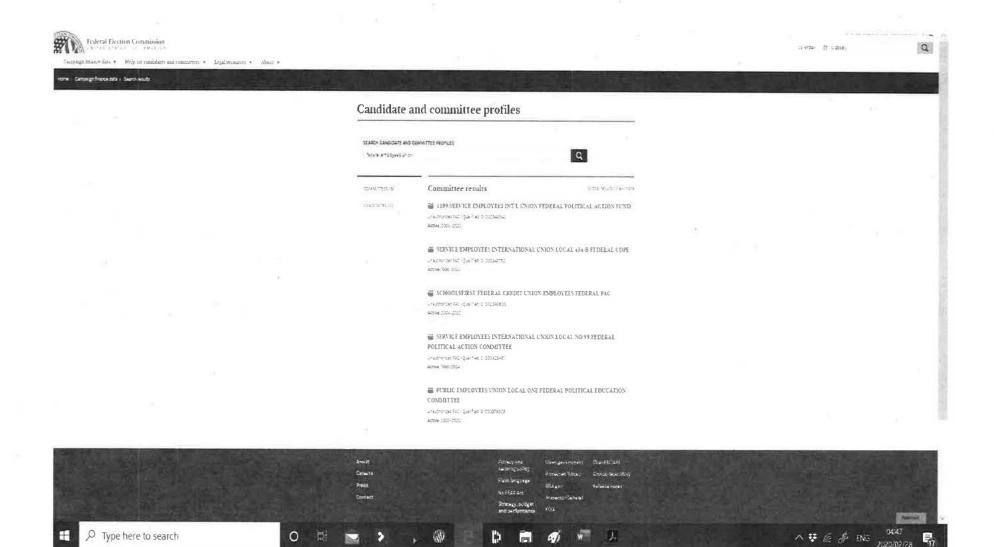
PIELING OF WEALTH MADERY
1969 WORLDOOFF DROTE
NOTE: 250
(ERNTO): Vorted and

#### Signed: Eathryn E. Hensley Date Signed: 12/07/2018 Official Committee URL: http://www.narfe.org

#### (End FEC FORM 1)

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**Exhibit E** 

MUR769100056

# THE VOICES OF THE AMERICAN FEDERATION OF GOVERNMENT EMPLOYEES

SUPER PAC (INDEPENDENT EXPENDITURE-ONLY) | ID: COOS12293 |

FINANCIAL SUMMARY	Financial summary	
Total related		
Total spent	TWO-YEAR PERIOO	
Cash summary	2019-2020	•
ABOUT THIS COMMITTEE		
RAIS NG	Total reised	■ Browde receipts
SPENDING	Doverage dates: 01/01/2019 to 12/31/2019	
FLINGS	TOTAL RECEIPTS II	\$850,000.00
	TOTAL CONTRIBUTIONS	\$850,000.00
	Fotal Individual contributions	\$850,000 00
	itemizeo individual contribuzione	\$850,000.00
	Uniternized Individual operationations	\$0.00
*	Party committee continuations	\$0.00
	Sther committee contributions -	\$0.00
	Predioent as public funds	
	TRANSFERS FROM APPRIATED COMMITTEES	\$0.00
	ALL LOANS RECEIVED	\$0.00
	LOAN REPAYMENTS RECEIVED	\$0.00
	OFFSETS TO OPERATING EXPENDITURES	\$0.00
	CANDIDATE REPUNDS	\$0.00
	OTHER RECEIPTS	\$0.00
	TOTAL TRANSFERS	\$0.00
	Non-federal transfers	\$0,00
	saven funds	\$0.00
	TOTAL FEDERAL RECEIPTS	\$850,000.00

Newly filled automory date may not appear for up to 48 hours

Total spent	Browse dispursements
Coverage dates: 01/01/2019 to 12/31/2019	
TOTAL DISBURSEMENTS III	\$530,567.26
OPERATING EXPENDITURES №	\$183.58
Allocated operating expanditures - federal	\$0.00
Allocated operating expenditures - non-federal	\$0.00
Other federal operating expenditures	\$19358
TRANSFERS TO AFFILIATED COMMITTEES	\$0.00
CONTRIBUTIONS TO OTHER COMMITTEES	\$530,373.71
INDEPENDENT EXPENDITURES	\$0.00
PARTY COORDINATED EXPENDITURES	\$0.00
LOANS MADE	\$0.00
LOAN REPAYMENTS MADE	\$0.00
TOTAL CONTRIBUTION REFUNDS	\$0.00
nd (vidua) refunds	\$0.00
Political party refunds	\$0.00
Other committee refunds	\$0.00
OTHER DISBURSEMENTS	\$0.00
TOTAL FEDERAL ELECTION ACTIVITY	\$0.00
Allocated faderal election activity - federal share	\$0.00
Allocated federal election activity - Lavin share	\$0.00
Federal election activity -federal only	\$0.00
TOTAL FEDERAL DISBURSEMENTS	\$\$30,587.26
Newly filed surrowary date may not appear for up to 48 hours	
Cash summary	
Coverage dates: 01/07/2019 to 12/51/2019	
BEGINNING CASH ON HAND	\$40,260.48
ENDING CASH ON HAND	\$359,693,19
DESTS/LOAMS OWED TO COMMITTEE	\$0.00

Newly filed summany data may not appear for up to 48 hours

DEBTS/LOANS OWED BY COMMITTEE

# **Exhibit F**

\$0.00



Campaign finance data ▼ Help for candidates and commuttees ▼ Legal resources ▼ About ▼

# NATIONAL ACTIVE AND RETIRED FEDERAL EMPLOYEES ASSOCIATION POLITICAL ACTION COM (NARFE-PAC)

MEMBERSHIP ORGANIZATION PAC - QUALIFIED | 10: C00091561

FINANCIAL SUMMARY	
Total rated	
Total spart	
Cash summary	
ASSULTED SOMETHE	· W
RAISING	
SPENDING.	
FILINGS	

#### Financial summary

TWO-YEAR PERIOD 2019-2020

Total raised

E Browse receiped

Coverage dates, 01/01/2019 to 12/31/2019

TOTAL RECEIPTS II	\$1,065,366,64
TOTAL CONTRIBUTIONS	\$1,043,128.96
Total Institlated sprot budgets	\$ : 0.13, : 29.96
ramitiva (nav leua) contrautions	\$129.160.96
Linderscale Individual contributions	\$3.0,769,01
Farty committee contributions	\$0.00
Other committee contributions	\$0.00
Precidence: public funds	
TRANSFERS FROM AFFILIATED COMMITTEES	\$0.00
ALL LOAKS RECEIVED	\$0.00
LOAN REPAYMENTS RECEIVED	\$0.00
OFFSETS TO OPERATING EXPENDITURES	\$23,998.70
CANDIDATE REPUNDS	\$0.00
OTHER RECEIPTS	\$18,259.88
TOTAL TRANSFERS	\$0.00
Non-federal transfero	\$3.00
Levinfunds	\$0.00
TOTAL FEDERAL RECEIPTS	\$1,085,388.84

New hit filed summary date may not appear for up to +6 hours.

Total spent

El Browse dispursements

Coverage dates: 01/01/2019 to 12/31/2019

TOTAL DISGURSEMENTS II	\$878,524,07
OPERATING EXPENDITURES ::	\$262,524.07
Allocated operating expenditures - federal	\$0.00
Allocated poerating expenditures - non-federal	\$0.00
Other federal operating expanditures	\$792,52407
TRANSFERS TO AFFILIATED COMMETTEES	\$6.00
CONTRIBUTIONS TO OTHER COMMITTEES	\$591,000.00
INDEPENDENT EXPENDITURES	50.00
PARTY COORDINATED EXPENDITURES	50.00
LOANS MADE	\$0.00
LOAN REPAYMENTS MADE	\$0.00
TOTAL CONTRIBUTION REFUNDS	\$0.00
Individual refunds	\$0.00
Political party refunds	\$0.00
Other committee refunds	\$0.00
OTHER DISBURSEMENTS	\$25,000.00
TOTAL FEDERAL ELECTION ACTIVITY	30.00
Allocated federal election activity - federal share	\$0.00
A roceted federal election activity - Levin chare	\$0.00
Federal election activity - federal only	\$0.00
TOTAL FEDERAL DISSURSEMENTS	\$878,524.07

Newly filed currency data may not appear for up to 48 hours

#### Cash nummary

Coverage dates: 01/01/2019 to 12/31/2019	
BEGINNING CASH ON HAND	\$1,011,427.68
ENDING CASH ON HAND	\$1,218,282.25
DESTS/LOANS OWED TO COMMITTEE	\$0.00
DESTS/LOANS OWED BY COMMITTEE	\$0.00

Newly filed purposery date may not appear for up to 48 hours.

# **Exhibit G**