

OFFICE OF  
GENERAL COUNSEL  
BEFORE THE FEDERAL ELECTION COMMISSION

2020 MAR 7 PM 1:59

Theresa Thibodeau

Omaha, NE 68154

v.

MUR No.

7711

Matt Innis for U.S. Senate, Inc.  
3434 O St  
Lincoln, NE 68510

**COMPLAINT**

Complainant seeks an immediate investigation into Senate candidate Matt Innis for failing to comply with basic disclosure requirements mandated by the Federal Election Campaign Act of 1971, as amended, which requires the accurate disclosure of expenditures made by his campaign. Public records show, and an investigation will confirm, that Matt Innis has failed to properly disclose campaign expenditures, in violation of 11 CFR 102.9(b).

**ARGUMENT**

Matt Innis for U.S. Senate, Inc. is the principal campaign committee for Matt Innis' candidacy for the U.S. Senate race in Nebraska.<sup>1</sup> Under federal law, campaign committees are required to report an account of:

"all disbursements made by or on behalf of the political committee. Such account shall consist of a record of: (i) The name and address of every person to whom any disbursement is made; [and,] (ii) The date, amount, and purpose of the disbursement."<sup>2</sup>

This federal requirement is foundational to fair elections and ensures that candidates do not misappropriate campaign funds.

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<sup>1</sup> See FEC Form 2 Statement of Candidacy, FEC (August 24, 2019), <https://docquery.fec.gov/cgi-bin/forms/C00716977/1349673/>.

<sup>2</sup> 11 C.F.R. 102.9(b).

Facebook advertisement records demonstrate that Matt Innis for U.S. Senate, Inc. spent campaign funds on multiple Facebook advertisements promoting Matt Innis' candidacy between August 2019 and December 2019.<sup>3</sup> Specifically, Facebook's advertisement library shows his campaign spent \$457 on digital advertisements.<sup>4</sup>

Nevertheless, in its filings with the Federal Election Commission, Matt Innis for U.S. Senate, Inc. failed to report any disbursements to Facebook and failed to report any disbursements related to digital advertising.<sup>5</sup> Indeed, the campaign has only reported the following disbursements: "printing," "credit card merchant fee," "compliance consulting," "payroll," "payroll tax," and "travel."<sup>6</sup> As such, it is clear that none of the reported disbursements include the costs spent by the campaign to place the Facebook advertisements.

Given this discrepancy, it is imperative for the Commission to penalize Matt Innis and Matt Innis for U.S. Senate, Inc., and conduct an expedited investigation into the extent to which Innis has failed to report his campaign's overall spending. If for some reason Innis disclosed the Facebook advertisements within one of the six disbursement types listed above, it is essential for the Commission to penalize Innis for failing to properly report "the purpose of the disbursement" as required by 11 C.F.R. 102.9(b)(ii).

Obfuscation of campaign spending is a serious violation and an abuse of the public trust. When Nebraskans make a contribution to a candidate for public office, they deserve to know how those funds are spent.

Respectfully submitted,



Theresa Thibodeau

Omaha, NE 68154


Subscribed and sworn before me this 26 day of February, 2020

<sup>3</sup>[https://www.facebook.com/ads/library/?active\\_status=all&ad\\_type=political\\_and\\_issue\\_ads&country=US&impression\\_search\\_field=has\\_impressions\\_lifetime&view\\_all\\_page\\_id=102865027725023](https://www.facebook.com/ads/library/?active_status=all&ad_type=political_and_issue_ads&country=US&impression_search_field=has_impressions_lifetime&view_all_page_id=102865027725023). See also, Exhibit A.

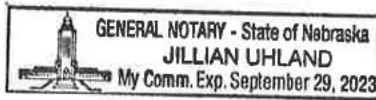
<sup>4</sup> *Id.*

<sup>5</sup>[https://www.fec.gov/data/disbursements/?committee\\_id=C00716977&two\\_year\\_transaction\\_period=2020&data\\_type=processed](https://www.fec.gov/data/disbursements/?committee_id=C00716977&two_year_transaction_period=2020&data_type=processed). See also, Exhibit B.

<sup>6</sup> *Id.*



Notary Public



My Commission Expires:

Sept 29, 2023  
Date

**EXHIBIT A**


[Help](#)

All Ads
Matt Innis for US Senate, Inc.

**Matt Innis for US Senate, Inc.**  
 Political Candidate · 883 likes

**Page transparency**  
 Page created Jul 26, 2019  
 Page name changed 1 time  
 Primary country location for people who manage this Page includes: United States (3)

**Total spent by Page on ads about social issues, elections or politics**  
 May 2018 - Feb 23, 2020  
 United States  
**\$457**  
[See spend details](#)

**Recently spent by Page on ads about social issues, elections or politics**  
 7 days - Feb 17 - Feb 23, 2020  
 United States  
**\$0**

17 results

Showing ads from Matt Innis for US Senate, Inc.

View: [All Ads](#) [Issue, Electoral or Political](#)Filter By: [United States](#) [Active and inactive](#) [All Impressions](#) [All Platforms](#) 0

Launched December 2019

Inactive

 Started running in Dec 19, 2019  
 (10/10/2019)


About social issues, elections or politics

 Matt Innis for US Senate, Inc.  
 Sponsored · (10/10/2019) Matt Innis for US Senate, Inc.

We've got some amazing volunteers!!! If you're interested in helping the campaign, let us know! (follow the link to the volunteer sign-up form)  
<http://bit.ly/2Q0uUD7>



Matt Innis for US Senate, Inc.

[Learn More](#)
[See Ad Details](#)

Launched November 2019

## EXHIBIT B

Spender	Recipient	State	Description	Disbursement date	Amount
MATT INNIS FOR U.S. SENATE, INC.	INNIS, MATT	NE	IN-KIND - TRAVEL	12/31/2019	\$1,979.11
MATT INNIS FOR U.S. SENATE, INC.	ANEDOT	TX	CREDIT CARD MERCHANT FEE	12/27/2019	\$40.30
MATT INNIS FOR U.S. SENATE, INC.	DESIGN 4	NE	PRINTING	12/26/2019	\$1,143.30
MATT INNIS FOR U.S. SENATE, INC.	THE COMPLIANCE CONSULTING COMPANY OF VIRGINIA	VA	COMPLIANCE CONSULTING	12/17/2019	\$2,000.00
MATT INNIS FOR U.S. SENATE, INC.	INTERNAL REVENUE SERVICE	OH	PAYROLL TAX	12/13/2019	\$504.90
MATT INNIS FOR U.S. SENATE, INC.	WADE, MIRANDA	MD	PAYROLL	12/12/2019	\$1,523.78
MATT INNIS FOR U.S. SENATE, INC.	PAYPAL	CA	CREDIT CARD MERCHANT FEE	12/03/2019	\$2.62
MATT INNIS FOR U.S. SENATE, INC.	DESIGN 4	NE	PRINTING	12/03/2019	\$1,200.00
MATT INNIS FOR U.S. SENATE, INC.	TRANSFORMATION MARKETING	NE	PRINTING	11/27/2019	\$1,000.00
MATT INNIS FOR U.S. SENATE, INC.	THE COMPLIANCE CONSULTING COMPANY OF VIRGINIA	VA	COMPLIANCE CONSULTING	11/20/2019	\$2,000.00
MATT INNIS FOR U.S. SENATE, INC.	WADE, MIRANDA	MD	PAYROLL	11/15/2019	\$1,523.77
MATT INNIS FOR U.S. SENATE, INC.	THE COMPLIANCE CONSULTING COMPANY OF VIRGINIA	VA	COMPLIANCE CONSULTING	10/17/2019	\$2,000.00
MATT INNIS FOR U.S. SENATE, INC.	THE COMPLIANCE CONSULTING COMPANY OF VIRGINIA	VA	COMPLIANCE CONSULTING	10/08/2019	\$2,000.00
MATT INNIS FOR U.S. SENATE, INC.	PAYPAL	CA	CREDIT CARD MERCHANT FEE	10/04/2019	\$7.73
MATT INNIS FOR U.S. SENATE, INC.	PAYPAL	CA	CREDIT CARD MERCHANT FEE	09/30/2019	\$9.66
MATT INNIS FOR U.S. SENATE, INC.	PAYPAL	CA	CREDIT CARD MERCHANT FEE	09/30/2019	\$13.71
MATT INNIS FOR U.S. SENATE, INC.	PAYPAL	CA	CREDIT CARD MERCHANT FEE	09/30/2019	\$26.07
MATT INNIS FOR U.S. SENATE, INC.	TRANSFORMATION MARKETING	NE	PRINTING	09/19/2019	\$5,300.00
MATT INNIS FOR U.S. SENATE, INC.	TRANSFORMATION MARKETING	NE	PRINTING	08/23/2019	\$520.02