

**BEFORE THE FEDERAL ELECTION COMMISSION**

Foundation for Accountability and Civic Trust  
1717 K Street NW, Suite 900, Washington, D.C. 20006

v.

MUR No. 7728

Burkett For Utah (FEC# C00704437)  
970 E. 700 S., #77, St. George, UT 84790

and

Stronger America Fund Inc.  
6920 Braddock Rd, Suite B #662, Annandale, VA 22003

**COMPLAINT**

The Foundation for Accountability and Civic Trust (FACT) is a nonprofit organization dedicated to promoting accountability, ethics, and transparency in government and civic arenas. This complaint is submitted,<sup>1</sup> upon information and belief, to request the Federal Election Commission (FEC) investigate Mary Burkett, her campaign committee, Burkett for Utah, and Stronger America Fund Inc. (a 501(c)(4) organization). There is reason to believe Stronger America Fund made, and Burkett and Burkett for Utah accepted, an illegal in-kind contribution in the form of a coordinated communication. We request the Commission investigate and if coordination is found, take appropriate enforcement actions to address the violations of the Federal Election Campaign Act.

**I. Facts**

Mary Burkett is a federal candidate for Congress and her campaign committee is Burkett for Utah. On April 29, 2019, Burkett for Utah filed its Statement of Organization with the FEC, which listed Patrick Krason as Treasurer and was signed by Krason.<sup>2</sup> In 2019 and 2020, Krason was also listed as the campaign's contact for media purposes. For instance, in October 9, 2019 and March 3, 2020 press releases, Burkett for Utah stated: "Media Contact: Patrick Krason . . . Email: pkrason@burkett4utah.com."<sup>3</sup> As recently as April 13, 2020, Krason was identified as the

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<sup>1</sup> This complaint is filed pursuant to 52 U.S.C. § 30109(a)(1).

<sup>2</sup> Burkett for Utah, *Statement of Organization*, FEC, filed Apr. 29, 2019, available at <https://docquery.fec.gov/pdf/552/201904299149603552/201904299149603552.pdf>.

<sup>3</sup> Burkett For Utah, *Meet The Utah Trump Supporter Running For Congress In 2020 – Who Can't Stand Mitt Romney*, Press Release, Oct. 9, 2019, available at <https://burkett4utah.com/press-releases/> (attached as Exhibit A); Burkett For Utah, *Utah Republican Candidate Mary Burkett's Response To Congressman Stewart's*

campaign's treasurer in Burkett's pre-convention campaign finance report, which Krason also signed.<sup>4</sup>

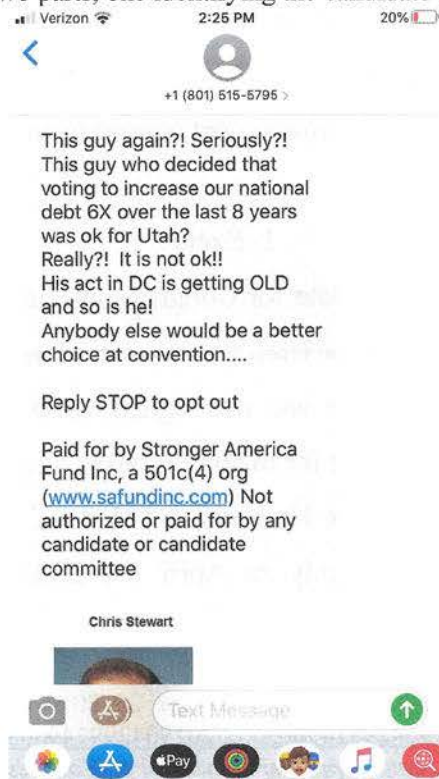
In April 2020, Stronger America Fund distributed a text message in opposition of a candidate Burkett is running against.<sup>5</sup> The text message identified Burkett's opposing candidate by name, advocated for voters to choose "anybody else," and contained a disclosure stating: "Paid

*Refusal To Debate Prior To Caucus Night*, Press Release, March 3, 2020, available at <https://burkett4utah.com/debate/> (attached as Exhibit B):



<sup>4</sup> Burkett For Utah, Pre-Convention Report, FEC, filed Apr. 13, 2020, available at: <https://docquery.fec.gov/pdf/629/202004139216667629/202004139216667629.pdf>.

<sup>5</sup> The communication appeared in two parts, one identifying the candidate and another with text:



See also, Burkett for Utah, Facebook post on April 8, 2020 (indicating the text was distributed prior to April 8, 2020).

for by Stronger America Fund Inc.”<sup>6</sup> Stronger America Fund was registered with the District of Columbia on April 18, 2017, with Patrick Krason as the Incorporator.<sup>7</sup> Krason is also listed as a Governor of Stronger America Fund.<sup>8</sup>

On April 8, 2020, in a Facebook post, Burkett addressed the text message sent by Stronger America Fund and the connection to her campaign.<sup>9</sup> Burkett stated that Krason had been a “consultant” and performed “campaign manager” tasks, and continued to work for her campaign as a “volunteer”:



Republican Mary Burkett For Utah 2020 - 2nd Congressional District

April 8 at 10:50 AM · 🌟

A text from the Chris Stewart campaign was just released. It accuses my campaign of going negative. This is untrue. I have been campaigning for over a year and I have never gone negative. Apparently a 501(c)4, group sent out a text yesterday reminding delegates of Chris Stewart's spending voting record. The group exists but I have NO connection to it. The specific person the Stewart text mentions, Patrick Krason, is NOT a paid employee. He is a volunteer and has been such since November of last year. Prior to that he was a consultant and yes, he did some of the tasks of a campaign manager. Until the recent travel restrictions, I have driven all over the district. I do not appreciate a third party stepping in and implicating me or my campaign negatively. I am running on my own ideas: balancing the budget, pro-life, pro-legal immigration and states rights, and on Chris's bad voting record on spending. He continues to say he fights for limited spending but his voting record, the only way a voter can tell that he is fighting and getting results for lowering spending, tells a very different story. I am going to reach out the group that sent the text and demand that they stop. But I also have to wonder if, because the Stewart campaign felt the need to respond and launch false accusations, if the original text hit a nerve?

👍👎👏 12

8 Comments

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

<sup>7</sup> [District of Columbia Dept. of Consumer and Regulatory Affairs](#), accessed April 9, 2020:

Stronger America Fund, Inc. - Initial File Number: N00005682050

Main Reports Trade Names Beneficial Owners					
Beneficial Owners					
Business Contact Type	Name	Address	Executing Officer	File Number	Actions
Governor	Krason, Patrick	700 Pennsylvania Avenue SE 2nd Floor Washington, DC 20003	Is Executing Officer?: No	000006068986	<a href="#">View</a>
Incorporator	Krason, Patrick	6920 Braddock Rd Suite B #662 Annandale, VA 22003	Is Executing Officer?: No	N00005682050	<a href="#">View</a>

<sup>8</sup> *Id.*; “‘Governor’ means a: . . . (B) Director or trustee of a nonprofit corporation.” D.C. Code § 29–101.02 (2020).

<sup>9</sup> Mary Burkett, [Facebook](#), April 8, 2020.



Accordingly, Burkett for Utah's FEC filings state that in 2019, it paid \$21,271.66 to "A Political Firm, LLC" for consulting, texting services, website expenses, research, and expense and travel reimbursements.<sup>10</sup> "A Political Firm" was formed in 2017, and its corporate filings with the State of Virginia list Patrick Krason as an Organizer, Member, and Registered Agent of the company.<sup>11</sup> In its most recent registered agent filing in December 2018, Krason signed the filing as a Member of "A Political Firm."<sup>12</sup>

## II. Law

Under federal law, candidates for federal office are subject to regulations that limit or prohibit contributions from and interactions with individuals, groups, and organizations. Among these regulations, federal candidates are prohibited from soliciting or accepting contributions from an individual or a non-multicandidate PAC in excess of \$2,800, from a multicandidate PAC in excess of \$5,000, or from any corporation or labor organization in any amount.<sup>13</sup> Federal candidates are also prohibited from accepting contributions from entities that accept contributions from corporations or labor organizations.<sup>14</sup> Additionally, individuals, groups, and organizations are also prohibited from making any illegal contribution.<sup>15</sup>

Contributions are broadly defined to include cash donations, but also "anything of value . . . for the purpose of influencing any election for Federal office."<sup>16</sup> When a person or entity pays for a communication that is coordinated with a candidate or campaign, it is an in-kind contribution.<sup>17</sup> To determine whether the communication was coordinated, a three-part test applies:

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<sup>10</sup> FEC, available at

[https://www.fec.gov/data/disbursements/?committee\\_id=C00704437&two\\_year\\_transaction\\_period=2020&recipient\\_name=A+POLITICAL+FIRM%2C+LLC&data\\_type=processed](https://www.fec.gov/data/disbursements/?committee_id=C00704437&two_year_transaction_period=2020&recipient_name=A+POLITICAL+FIRM%2C+LLC&data_type=processed), accessed April 9, 2020.

<sup>11</sup> Exhibit C. A Political Firm, LLC was formed on January 9, 2017. The company is registered in the State of Virginia, although its status is currently inactive due to nonpayment of registration fees. Its registered agent is listed as Patrick Daniel Krason, 3453 Annandale Rd., Falls Church, VA 22042. Another entity, Patrick Krason Solutions LLC was formed on August 27, 2018. The company is registered in the State of Virginia, although its status is currently inactive due to nonpayment of registration fees. Its registered agent is A Political Firm, LLC, 3453 Annandale Rd., Falls Church, VA, 22042.

<sup>12</sup> Exhibit C. A Political Firm, LLC, *Statement of Change of Registered Office and/or Registered Agent Change*, State Corporation Commission of the Commonwealth of Virginia, filed Dec. 4, 2018.

<sup>13</sup> 52 U.S.C. §§ 30116, 30118.

<sup>14</sup> 52 U.S.C. §§ 30101, 30118.

<sup>15</sup> See, e.g., 52 U.S.C. § 30116(a)(7)(B).

<sup>16</sup> 52 U.S.C. § 30101(8)(A).

<sup>17</sup> Federal law defines the following expenditure as a contribution: "[E]xpenditures made by any person in cooperation, consultation, or concert, with, or at the request or suggestion of, a candidate, his authorized political committees, or their agents, shall be considered to be a contribution to such candidate[.]" 52 U.S.C. § 30116(a)(7)(B)(i).

(1) the communication is paid for by a third-party; (2) the communication satisfies a “content” standard of 11 C.F.R. § 109.21(c); and (3) the communication satisfies one of the “conduct” standards of 11 C.F.R. § 109.21(d).<sup>18</sup>

### **III. Cause of Action: Illegal In-Kind Contribution of a Coordinated Communication**

There is reason to believe Stronger America Fund made, and Burkett and Burkett for Utah accepted, an illegal in-kind contribution. Specifically, a communication is coordinated with a candidate, an authorized committee, or a political party committee when: (1) it satisfies the payment standard, i.e. is paid for by a person or entity other than the “candidate, authorized committee, or political party committee”; (2) it satisfies a “content standard” of 11 C.F.R. § 109.21(c), i.e. expressly advocates for the election or defeat of a clearly identified candidate for Federal office or is the functional equivalent of express advocacy; and (3) satisfies a “conduct standard” of 11 C.F.R. § 109.21(d), i.e. the paying entity and campaign share a common vendor or former employee or independent contractor.<sup>19</sup>

First, the payment standard was clearly satisfied on the face of the communication because the disclaimer stated, “Paid for by Stronger America Fund Inc.” and not the candidate.

Second, the content standard was clearly satisfied because the communication identified a federal House candidate by name and advocated for a vote against the candidate.<sup>20</sup> Additionally, the communication “is susceptible of no reasonable interpretation other than as an appeal to vote for or against a clearly identified Federal candidate.”<sup>21</sup>

Third, there is reason to believe the communication satisfied a conduct standard because the campaign and outside organization were connected by a single individual. Specifically, the communication was distributed by Stronger America Fund, which lists Krason as an Incorporator and Governor of the organization. Krason is also the Treasurer for Burkett for Utah. Burkett explained that Krason performed “campaign manager” work in 2019, and continues to perform work for the campaign on a “volunteer” basis. Moreover, the campaign’s press release in March 2020 also identified Krason as the campaign’s media contact, indicating he was performing work

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<sup>18</sup> 11 C.F.R. § 109.21.

<sup>19</sup> 11 C.F.R. § 109.21.

<sup>20</sup> 11 C.F.R. § 109.21(c)(3).

<sup>21</sup> 11 C.F.R. § 109.21(c)(5).

related to “media strategy” or “consulting” or “otherwise providing political or media advice.”<sup>22</sup> Thirty-five days before the text message was distributed by Stronger America Fund, Krason was the treasurer of and performing media related work for the campaign on March 3, 2020; and only a few days after the text message was distributed, Krason continued to be identified as the campaign’s treasurer on an April 13, 2020 campaign finance report.<sup>23</sup>

Under the law, a coordination is communicated if the paying entity and campaign share a “common vendor” or “former independent contractor or employee.”<sup>24</sup> The facts of this case go beyond the requirements of either alternative. Either the “common vendor” or “former employee or independent contractor” analysis applies because (1) the communication was paid for by Stronger America Fund, of which Krason is a Governor; and (2) Krason, personally or through his company “A Political Firm,” performed work for the campaign in the 120 days prior to the text communication being sent. In both alternatives, Krason is associated with the person paying for the communication (which includes the entity or agent of an entity) and is the campaign’s commercial vendor (including any owner, officer, or employee) or contractor that performed work at the same time the text communication was sent.<sup>25</sup>

#### IV. Conclusion

There is reason to believe Stronger America Fund made, and Burkett and Burkett for Utah accepted, an illegal in-kind contribution in the form of a coordinated communication. The two entities both appear to be affiliated with the same individual during the time Stronger America Fund disseminated and paid for a communication beneficial to Burkett. If so, it would constitute an illegal in-kind contribution to Burkett’s campaign. We request the Commission immediately investigate and if a violation is found, act immediately and impose appropriate penalties.

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<sup>22</sup> 11 C.F.R. § 109.21(d)(4)(ii)(A) and (I).

<sup>23</sup> 11 C.F.R. § 109.21(d)(4) and (5). There is no requirement the common vendor, employee, or independent contractor be paid by the campaign. *Id.*

<sup>24</sup> 11 C.F.R. § 109.21(d)(4) and (5).

<sup>25</sup> 11 C.F.R. § 109.21(d)(4)(ii).

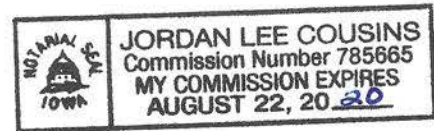
Respectfully submitted,

*K Arnold*

Kendra Arnold, Executive Director  
Foundation for Accountability & Civic Trust  
1717 K Street NW, Suite 900  
Washington, D.C. 20006

STATE OF IOWA  
COUNTY OF POLK

)  
) ss.  
)



Subscribed and sworn to before me on April 22<sup>nd</sup>, 2020.

*Jordan Lee Cousins*

Notary Public in and for the State of Iowa

Exhibit A

[DEBATE](#) [VISION](#) [ISSUES](#) [PRESS](#) [ENDORSEMENTS](#) [GET INVOLVED](#) [CONTACT](#) [OFFICIAL RULES](#)[DONATE](#)

# PRESS RELEASES

## Meet Mary Burkett Utah 2020 Congressional Candidate 2nd District

\*Meet Mary Burkett Utah 2020 Congressional Candidate 2nd District. Join national political commentator and host of US National Elections Chauncey I. Brown III as we speak with 2020 US Congressional candidate Mary Burkett as she discusses her plan for Utah and the American people.

\*Click on link to listen live @ <https://www.blogtalkradio.com/usnationalelections/2020/01/22/meet-mary-burkett-utah-2020-congressional-candidate-2nd-district>

## Meet the Utah Trump supporter running for congress in 2020 — who can't stand Mitt Romney

[Click here to read more](#)



**PRESS RELEASE**

For Immediate Release – October 9, 2019

Media Contact: Patrick Krason

Telephone: 202-567-1171

Email: pkrason@burkett4utah.com

Website: www.burkett4utah.com

Mary Burkett is available for all press interviews and inquiries. Please contact Patrick Krason to schedule.

**Utah Republican House Candidate Mary Burkett Calls on Senator Mitt Romney to end his personal vendetta against President Trump**

Utah District 02 Congressional Candidate, Mary Burkett of St. George, announces today that she is calling on Senator Mitt Romney to end his personal vendetta and war of words against President Trump and begin working to unite, rather than divide, the Republican Party and America.

"Senator Romney's attacks on President Trump are appalling. He attacks the President's personal style and behavior, but not the substance of what President Trump has achieved for America. As a Senator who votes with the President 79.2% of the time, I wonder why Senator Romney feels it is necessary to further divide the country this way.

My mother used to say that if you don't have anything nice to say, don't say anything at all. With the amount of media attention Senator Romney receives, he should be using his platform to give support to the President's agenda, work on uniting a fractured Republican Party, and help to begin healing the rift in American society.

I taught my children that real leaders lead by example, by their actions. I expect as much from my Senator. As a man who spends a lot of time complaining about the lack of decorum shown by the President, I expect Senator Romney to exhibit some, even if he doesn't personally like the man in the Oval Office right now.

Most Americans are well aware of the animosity between these two men. It is not appropriate for a sitting Senator to throw gas on the fire of conjecture and half truths in pursuit of winning his personal squabble with the President. Like the rest of us, he needs to give the time required to examine all of the facts and get to the truth.

Senator Romney was elected to represent the people of Utah. What he does in our name matters and affects every Utahan.

Senator Romney would do well focusing his energy on real problems in this country, particularly our out of control national debt, comprehensive immigration reform, and veterans' issues."

Mary Burkett is running for Utah's 2<sup>nd</sup> Congressional District on a platform that focuses on reducing the national debt, protecting life at all stages, and developing comprehensive immigration reform plan that includes a physical barrier on the southern border.



Exhibit B

[DEBATE](#) [VISION](#) [ISSUES](#) [PRESS](#) [ENDORSEMENTS](#) [GET INVOLVED](#) [CONTACT](#) [OFFICIAL RULES](#)[DONATE](#)

# Debate

In light of the precautions taken to minimize the spread of Corona Virus, we will proceed to hold debates but will do so in smaller venues that hold a minimal number of people. Debates will be live streamed in an interactive format to be sure that anyone who wants to ask questions, has the opportunity to do so.

March 27, 2020/Washington County Library/Washington City Branch/220 North 300 East/Washington City, UT 6:30 pm

Friends and Delegates, my Congressional Campaign issued the following press release today concerning Congressman Chris Stewart's refusal to debate prior to the caucus night and to allow the delegates and voters to hear from the candidates. Read the release. There will be debates whether Chris Stewart attend or not. We hope he attends.

Mary

For Immediate Release – March 3, 2020

Media Contact: Patrick Krason

Telephone: 202-417-7385

Email: [pkraason@burkett4utah.com](mailto:pkraason@burkett4utah.com)

Website: [www.burkett4utah.com](http://www.burkett4utah.com)

Mary Burkett is available for press interviews and inquiries. Please contact Patrick Krason to schedule.

## Utah Republican Candidate Mary Burkett's Response to Congressman Stewart's Refusal to Debate Prior to Caucus Night

Mary Burkett shared, "It is with frustration and dismay that I must inform the voters and delegates of Utah's 2nd Congressional District that Congressman Chris Stewart has declined a written invitation to have two debates prior to the upcoming caucus night. It is my belief that the delegates and voters should have the opportunity to hear directly from the candidates before they choose who to support."



February 20, 2020

Mrs. Mary Burkett,

Thank you for your interest in a debate. I will gladly debate any candidate who qualifies for a primary election in June.

Federal candidates historically do not conduct debates before state convention, and it is my understanding that the Utah Debate Commission will only host debates post-convention. I am running to be the Republican nominee for the 2nd District and will only seek nomination through caucus- convention, as I have always done, and not through signature gathering as other candidates for this office may choose to do.

I will happily accept a Utah Debate Commission invitation to debate with anyone who should qualify for a primary election. My platform has always been to support the Constitution, ensure our national defense, reduce the size and influence of the federal government, and cut deficit spending and debt. I'm confident that my record, throughout my service in Congress supporting this platform, will ensure the trust of the delegates at convention to become the nominee for Utah's 2nd Congressional District.

I look forward to seeing you on the campaign trail.

Sincerely,

Chris Stewart  
[Info@StewartForUtah.com](mailto:Info@StewartForUtah.com)  
[www.StewartForUtah.com](http://www.StewartForUtah.com)

"With that said, I don't give up easily. Working with the other declared Republican candidates, I am working to schedule two debates before the caucus night. It is sad that Congressman Stewart hides behind the Utah Debate Commission as an excuse not to debate. It is sad Chris Stewart refuses to focus on his constituents in Utah. It is sad, but not surprising, that Chris Stewart wants to hide from his voting record, a voting record he can't defend in Utah 02.

The debates being planned will be open to all of the FEC registered Republican Candidates in Utah CD 02. We hope Congressman Stewart will take the opportunity to join us. The voters deserve as much."

More specific information concerning the debates will be release within the next week.

Mary Burkett is running for Utah's 2nd Congressional District on a platform that focuses on reducing the national debt, protecting life at all stages, and developing a comprehensive immigration reform plan that includes a physical barrier on the southern border.



COMMONWEALTH OF VIRGINIA  
STATE CORPORATION COMMISSION

Office of the Clerk

January 9, 2017

PATRICK DANIEL KRASON  
7213 FARR ST  
ANNANDALE, VA 22003

RECEIPT

RE: A Political Firm, LLC

ID: S6564829

DCN: 17-01-09-5718

Dear Customer:

This is your receipt for \$100.00 to cover the fee(s) for filing articles of organization for a limited liability company with this office.

The effective date of the filing is January 9, 2017.

If you have any questions, please call (804) 371-9733 or toll-free in Virginia, (866) 722-2551.

Sincerely,

Joel H. Peck  
Clerk of the Commission

RECEIPTLC  
LLNCD  
CISECOM



COMMONWEALTH OF VIRGINIA  
STATE CORPORATION COMMISSION

AT RICHMOND, JANUARY 9, 2017

The State Corporation Commission has found the accompanying articles submitted on behalf of  
A Political Firm, LLC

to comply with the requirements of law, and confirms payment of all required fees. Therefore, it  
is ORDERED that this

CERTIFICATE OF ORGANIZATION

be issued and admitted to record with the articles of organization in the Office of the Clerk of the  
Commission, effective January 9, 2017.

STATE CORPORATION COMMISSION

By

A handwritten signature in black ink, appearing to read 'J. C. Dimitri', written over a horizontal line.

James C. Dimitri  
Commissioner

DLLCACPT  
CISECOM  
17-01-09-5718

**ARTICLES OF ORGANIZATION  
OF  
A POLITICAL FIRM, LLC**

The undersigned, pursuant to Chapter 12 of Title 13.1 of the Code of Virginia, states as follows:

1. The name of the limited liability company is A Political Firm, LLC.
2. The purpose for which the limited liability company is formed is to engage in any lawful business, purpose or activity for which a limited liability company may be formed under the Virginia Limited Liability Company Act.
3. The name of the limited liability company's initial registered agent is Patrick Daniel Krason. The initial registered agent is an individual who is a resident of Virginia and a member or manager of the limited liability company.
4. The address of the limited liability company's initial registered office, which is identical to the business office of the initial registered agent, is 7213 Farr St, Annandale, VA 22003. The initial registered office is located in Fairfax County, Virginia.
5. The address of the limited liability company's principal office where the records of the limited liability company are to be kept is 7213 Farr St, Annandale, VA 22003.

ORGANIZER:

/s/ Patrick D Krason Date: January 9, 2017

Patrick D Krason  




COMMONWEALTH OF VIRGINIA  
STATE CORPORATION COMMISSION

Office of the Clerk

PATRICK DANIEL KRASON  
2221 S CLARK ST  
ARLINGTON, VA 22202

April 17, 2018

RECEIPT

RE: **A Political Firm, LLC**

ID: **S6564829**

DCN: **1804175942**

Dear Customer:

This is to acknowledge the filing of a statement of change of registered office and/or registered agent for the above-referenced limited liability company with this office.

The effective date of the change is April 17, 2018.

If you have any questions about this matter, please contact this office at the addresses or telephone numbers shown below.

RECEIPT  
CISECOM

Sincerely,

Joel H. Peck  
Clerk of the Commission



eFile  
(12/09)

COMMONWEALTH OF VIRGINIA  
STATE CORPORATION COMMISSION

STATEMENT OF CHANGE OF REGISTERED OFFICE  
AND/OR REGISTERED AGENT CHANGE

1. RE: **A Political Firm, LLC**  
  
ID: **S6564829**
2. Current registered agent's name and registered office address on record (including the jurisdiction in which the registered office is physically located):  
PATRICK DANIEL KRASON  
7213 FARR ST  
ANNANDALE, VA 22003-0000 (FAIRFAX COUNTY)
3. The current registered agent is an individual who is a resident of Virginia and a member or manager of the limited liability company.
4. The registered agent's name and registered office address after this statement is filed with the Commission (including the jurisdiction in which the registered office is physically located):  
PATRICK DANIEL KRASON  
2221 S Clark St  
Arlington, VA 22202 (ARLINGTON COUNTY)
5. The registered agent named in item 4 is an individual who is a resident of Virginia and a member or manager of the limited liability company.
6. After the foregoing change or changes are made, the limited liability company will be in compliance with the requirements of § 13.1-1015 of the Code of Virginia.

Signed on April 17, 2018, on behalf of A Political Firm, LLC

By: Patrick Krason, Member

/s/ Patrick Krason





COMMONWEALTH OF VIRGINIA  
STATE CORPORATION COMMISSION

Office of the Clerk

December 4, 2018

PATRICK DANIEL KRASON  
3453 ANNANDALE RD  
FALLS CHURCH, VA 22042

RECEIPT

RE: **A Political Firm, LLC**

ID: **S6564829**

DCN: **1812046817**

Dear Customer:

This is to acknowledge the filing of a statement of change of registered office and/or registered agent for the above-referenced limited liability company with this office.

The effective date of the change is December 4, 2018.

If you have any questions about this matter, please contact this office at the addresses or telephone numbers shown below.

RECEIPT  
CISECOM

Sincerely,

Joel H. Peck  
Clerk of the Commission



eFile  
(12/09)

COMMONWEALTH OF VIRGINIA  
STATE CORPORATION COMMISSION

STATEMENT OF CHANGE OF REGISTERED OFFICE  
AND/OR REGISTERED AGENT CHANGE

1. RE: **A Political Firm, LLC**

ID: **S6564829**

2. Current registered agent's name and registered office address on record (including the jurisdiction in which the registered office is physically located):

PATRICK DANIEL KRASON

2221 S CLARK ST

ARLINGTON, VA 22202-0000

(ARLINGTON COUNTY)

3. The current registered agent is an individual who is a resident of Virginia and a member or manager of the limited liability company.

4. The registered agent's name and registered office address after this statement is filed with the Commission (including the jurisdiction in which the registered office is physically located):

PATRICK DANIEL KRASON

3453 Annandale Rd

Falls Church, VA 22042

(FAIRFAX COUNTY)

5. The registered agent named in item 4 is an individual who is a resident of Virginia and a member or manager of the limited liability company.

6. After the foregoing change or changes are made, the limited liability company will be in compliance with the requirements of § 13.1-1015 of the Code of Virginia.

Signed on December 4, 2018, on behalf of A Political Firm, LLC

By: Patrick D Krason, Member

/s/ Patrick D Krason