

RECEIVED
FEDERAL ELECTION COMMISSION
JULY 16, 2020 5:30 PM
OFFICE OF GENERAL COUNSEL

July 13, 2020

ATTN: Office of General Counsel
Federal Election Commission

MUR 7762

Complainant: Mr. Sean E. Lester (Treasurer)
P.O. Box 17978
Nashville, TN 37217

Mr. Ben Shelton (Designated Agent)
1116 Lawrence Avenue
Madison, TN 37115

Committee # C00739227, BROOKS FOR SENATE

For: August 6, 2020 Primary Election Complaint – Illegal Collection / Use of Resources, Impersonation

To Whom It May Concern:

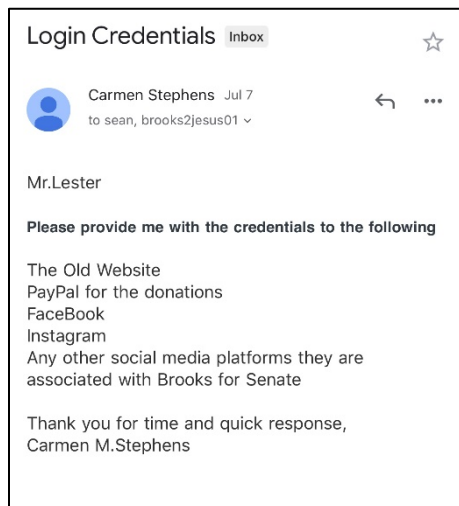
This complaint is being filed against 2020 U.S. Senatorial Candidate – Natisha Brooks (Republican), ID # S0TN00235. The accusations being filed against the Candidate include:

- Illegal Collection of Campaign Donations
- Improper Use of Campaign Donations
- Campaign Impersonation
- Non-Disclosure of Expenses
- Withholding Campaign Donations
- Withholding Campaign Mail

As a Treasurer for a primary campaign during a Federal election, I expend great effort to ensure the efficiency and legality of all campaign donation receipts, campaign expenses, and campaign financial reports. I take much pride in my position, yet it is imperative that this complaint be filed due to the improper behaviors performed by the Candidate.

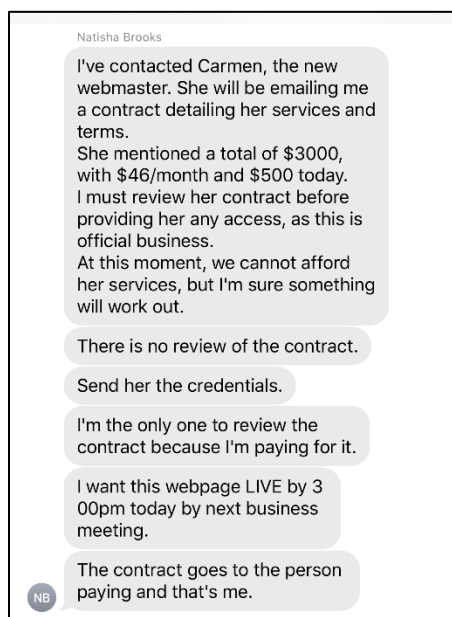
Count 1: Illegal Collection of Campaign Donations

On July 7, 2020, Campaign Treasurer, Sean E. Lester, received the following e-mail request from one Carmen Stephens, webmaster, for privileged access to the registered campaign website *www.brooksforenate.org*.

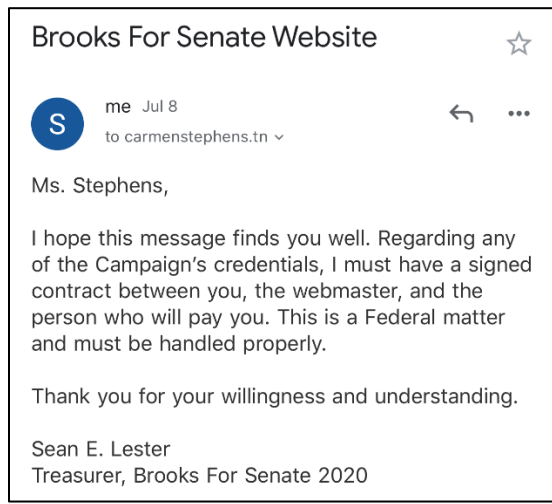


This request was not fulfilled because there was not yet a written / signed contract between Ms. Stephens and the BROOKS FOR SENATE Campaign.

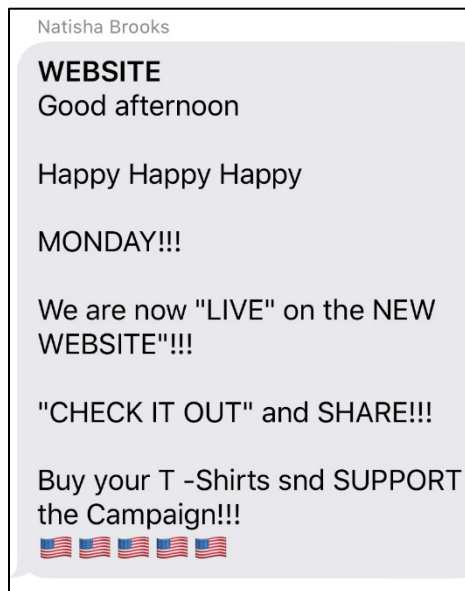
Also on July 7, 2020, Candidate Brooks sent Treasurer Lester the following text message in which she claimed to be the sole entity needing to review a contract for the FEC registered BROOKS FOR SENATE campaign website:



Treasurer replied to Carmen Stephens on July 8, 2020 with the following e-mail:

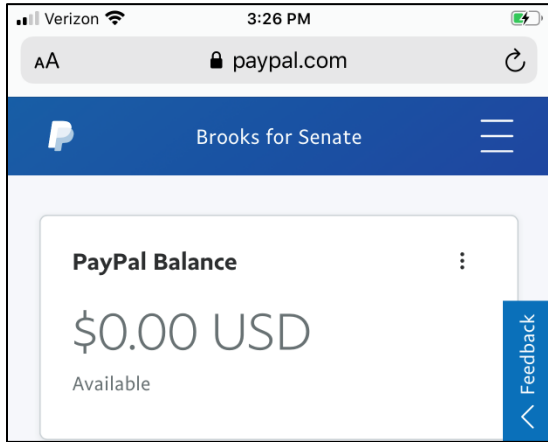


This was the end of correspondence on the topic of website amendment, until Monday, July 13, 2020 when Treasurer received the following text message from Candidate Brooks:

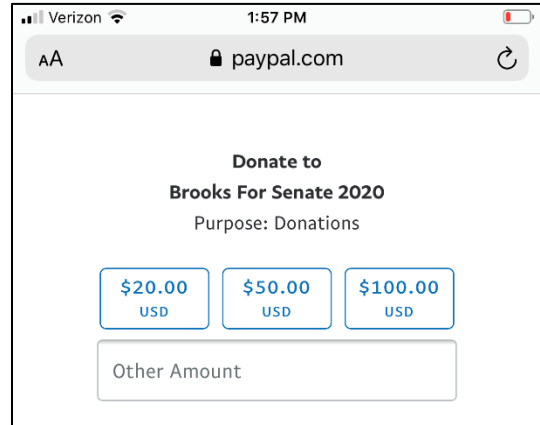


This text message shows that Candidate Brooks has likely entered a contract with webmaster Carmen Stephens to alter the FEC registered campaign website, www.brooksforsenate.org, without the Campaign's (i.e. Treasurer or Designated Agent) knowledge or permission.

Upon inspection of the amended website, *www.brooksforsenate.org*, it was discovered that a new PayPal account link was established to collect online donations. Here are photos showing the contrast between the original Campaign PayPal account, Brooks For Senate, and the fraudulent PayPal account, “Brooks For Senate 2020”:

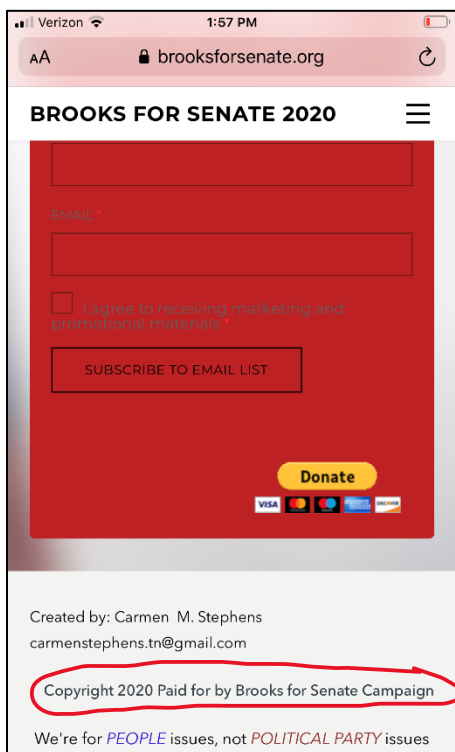


Actual Campaign Account – Brooks For Senate



Fraudulent Account – Brooks For Senate 2020

Not only has a fraudulent account been arranged to receive donations, Carmen Stephens, webmaster, has claimed that the new site was paid for with BROOKS FOR SENATE campaign funds, as shown here:

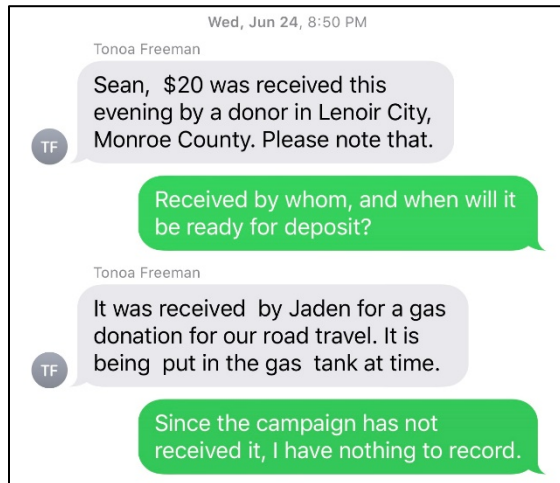


This behavior by Candidate Brooks and Carmen Stephens is false impersonation of a Federal campaign.

Count 2: Improper Use of Campaign Donations

Candidate Brooks and associates, Jaden Falls and Tonoa Freeman, have received and utilized campaign donations from the public without forwarding said funds to the treasury.

On June 24, 2020, associate Tonoa Freeman sent the following text message to the Treasurer:



The following day, June 25, 2020, associate Freeman submitted an online donation of \$10.00. This payment did not replace the full amount of the previous days' contribution.

<div> <div>< > AA paypal.com</div> <div> <div></div> <div>+</div> <div></div> </div> </div>				
All	Search for transactions			
Archive Active	Transaction Type All transactions	Date Past 30 days	Amount & Currency All currencies	
Jun 26, 2020	Instant Withdraw to	Debit Card	Completed	-\$9.41 USD
Jun 25, 2020	Payment from	Tonoa Foster-Freeman	Completed	\$10.00 USD

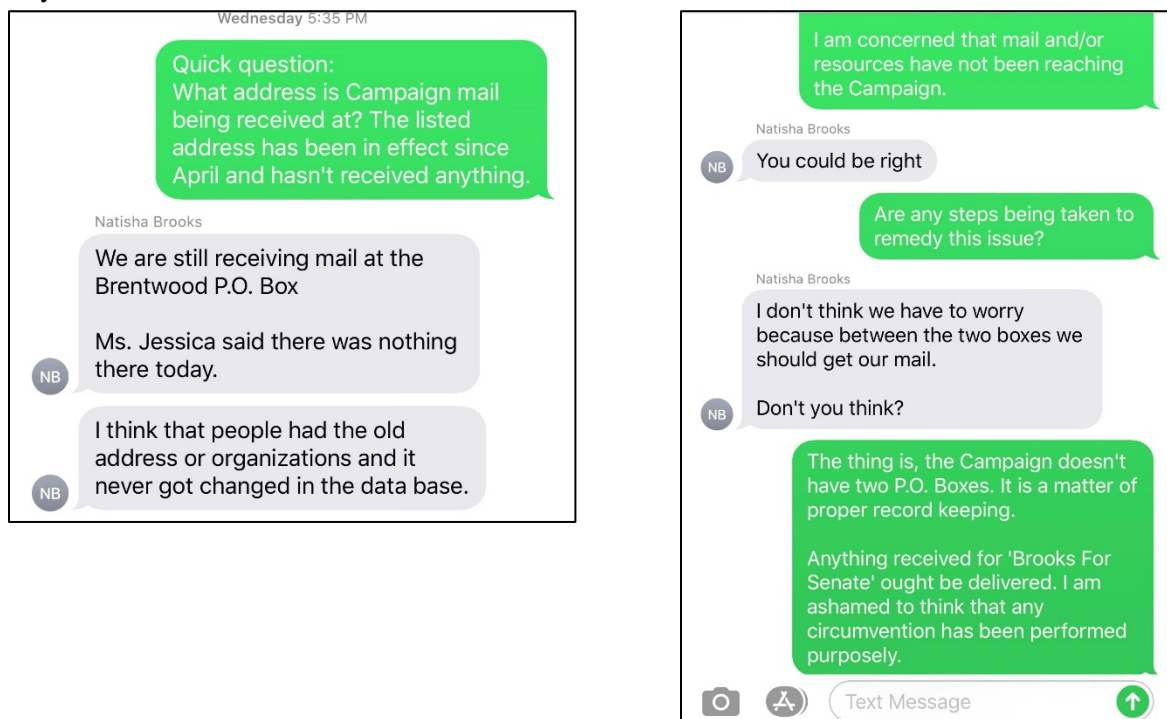
These behaviors show that funds have been received, improperly used, and have not been fully delivered to the Campaign Treasurer.

Count 3: Withholding Mail and Resources

The BROOKS FOR SENATE primary campaign has purchased P.O. Box #17424, located at 301 Ezell Pike, Nashville, TN 37217. This agreement was entered into on April 9, 2020.

Candidate Brooks utilizes a separate P.O. Box for her personal business. It is believed that Campaign contributions and general correspondence have been directed to her mailbox rather than the proper campaign address. The following text message depicts a conversation between Treasurer and Candidate Brooks:

July 8, 2020



In these messages, Candidate Brooks shows lack of concern for the incorrect receipt of mail. Once Treasurer explicitly stated the possibility of funds being misdirected, Candidate Brooks' reply was simply, "You could be right".

Being that the mail has been delivered to her personally registered address, there is reason to believe she knows the contents of said P.O. Box.

Count 4: Withholding of Campaign Donations

According to Candidate Brooks, she, along with her personal associates, have received an amount near \$2,500.00 from the public. These associates are not operating with express consent of the Campaign to collect funds, nor have these alleged funds been received in the campaign treasury.

The following e-mail message shows that Candidate Brooks has solicited personal assistance, including minors, to collect funds:

July 8, 2020

They (Brooks Academy Scholars) did the following for me and of course Received a Grade for what it takes to run for The United States Senate.

A. They were with me when I "Pulled my Petition"!
B. They had to raise the money for the campaign.
Thus far they have raised about \$2500 and I'm darn PROUD OF THEM!!!

Count 5: Non-Disclosure of Expenses

Candidate Brooks has not disclosed the extent of her personal spending on In-Kind Donations. The attempt to hide expenses shows lack of respect for the record-keeping responsibility of the Treasurer. These expenditures were neither authorized by the Campaign, nor did these purchases benefit any listed campaign member.

The following e-mail from Candidate Brooks to Treasurer clearly displays the non-reporting of expenses incurred:

I've spent over \$3500 in Hertz Rental Car Fees for the Campaign and you didn't ask to read that contract.

You did ask for the receipts. To date I've only given you one car rental receipt because I knew the campaign didn't have the money.

The previous report has expressed clear and present concern for the current state of the BROOKS FOR SENATE primary campaign. The complaints filed here are made in good faith, founded in fact, and reach beyond reasonable doubt.

Affirmation

I, Sean E. Lester, and I, Ben Shelton,
(Treasurer) (Designated Agent)

hereby swear and affirm the facts presented in this complaint on July 15 2020.

Printed Name: Mr. Sean E. Lester, Treasurer

Printed Name: Mr. Ben Shelton, Designated Agent

Signature: Sean E. Lester

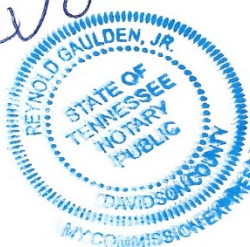
Date: 07/15/2020

Signature: Ben Shelton

Date: 07/15/2020

Notary:

[Signature]



9-7-2020