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FEDERAL ELECTION COMMISSION

AUGUST 14, 2020 2:56 PM

OFFICE OF GENERAL COUNSEL

**BEFORE THE FEDERAL ELECTION COMMISSION**

Ken Martin

Eagan, MN 55122

**MUR 7779***Complainant,*

v.

Mr. Adam Charles Weeks

Goodhue, MN 55027

Weeks2020  
22115 350th St.  
Goodhue, MN 55027

Ms. Mary Weeks

Cannon Falls, MN 55009

*Respondents.***COMPLAINT**

This complaint is filed pursuant to 52 U.S.C. § 30109(a)(1) against Mr. Adam Charles Weeks, 2020 candidate for Minnesota Congressional District 2 (FEC ID# H0MN02167) Mr. Weeks's principal campaign committee, Weeks2020 (FEC ID# C00746875), and Ms. Mary Weeks, in her official capacity of treasurer for Weeks2020 (collectively, "Respondents"), for apparently violating the Federal Election Campaign Act of 1971, as amended (the "Act") and Federal Election Commission (the "Commission") regulations by failing to file at least one required campaign finance disclosure report. The Commission should immediately launch an investigation to determine whether Respondents violated the Act and Commission regulations.

## FACTUAL BACKGROUND

Mr. Adam Charles Weeks is a candidate for Minnesota's 2nd Congressional district in the 2020 general election. He is running as a member of the Legal Marijuana Now Party.<sup>1</sup> Mr. Weeks filed a statement of candidacy with the Commission on May 25, 2020.<sup>2</sup> Ms. Mary Weeks filed the Statement of Organization for Weeks2020 with the Commission on May 22, 2020.<sup>3</sup>

Two campaign finance disclosure report deadlines have passed since Mr. Weeks registered as a candidate and Respondents registered the Weeks2020 committee. The July Quarterly report, covering activity through June 30, 2020, was due to the Commission on July 15, 2020.<sup>4</sup> The Pre-Primary report, covering activity from July 1, 2020 through July 22, 2020, was due to the Commission on July 30, 2020.<sup>5</sup> Despite these deadlines, Weeks2020 has not filed any campaign finance disclosure reports since the committee registered in May 2020.<sup>6</sup>

## LEGAL ARGUMENT

The Act and Commission regulations require a federal candidate's principal campaign committee to file periodic reports of contributions and expenditures with the Commission.<sup>7</sup> A committee must file these reports if it is otherwise required to register with the Commission.<sup>8</sup> In the case of a principal campaign committee, the committee must register and report its contributions and expenditures if a person who qualifies as a candidate under federal law

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<sup>1</sup> See Weeks2020 Website, <https://www.weeks2020.com/> (last accessed Aug. 6, 2020).

<sup>2</sup> FEC Form 2, Statement of Candidacy of Adam Charles Weeks (May 25, 2020), <https://docquery.fec.gov/cgi-bin/forms/H0MN02167/1408409/> (last accessed Aug. 6, 2020).

<sup>3</sup> FEC Form 1, Statement of Organization of Weeks2020 (May 22, 2020), <https://docquery.fec.gov/pdf/917/202005229239492917/202005229239492917.pdf> (last accessed Aug. 6, 2020).

<sup>4</sup> FEC, 2020 Quarterly Reports, <https://www.fec.gov/help-candidates-and-committees/dates-and-deadlines/2020-reporting-dates/2020-quarterly-filers/> (last accessed Aug. 6, 2020).

<sup>5</sup> FEC, Pre-election Reports, <https://www.fec.gov/help-candidates-and-committees/filing-reports/pre-election-reports/>, (last accessed Aug. 10, 2020).

<sup>6</sup> See FEC, Committee Filings of Weeks2020, <https://www.fec.gov/data/committee/C00746875/?tab=filings> (last accessed Aug. 6, 2020) (showing that Weeks2020 has not filed any required campaign finance disclosure reports).

<sup>7</sup> See 52 U.S.C. § 30104(a); 11 C.F.R. § 104.1(a).

<sup>8</sup> See 11 C.F.R. § 104.1(a).

designates the committee as his or her principal campaign committee.<sup>9</sup> The principal campaign committee of a congressional candidate must file quarterly reports “no later than the 15th day following the close of the immediately preceding calendar quarter (on April 15, July 15, and October 15).”<sup>10</sup> During the election year, the principal campaign committee must also submit pre-election and post-election reports.<sup>11</sup>

Respondents plainly violated the Act and Commission regulations by failing to file two required campaign finance disclosure reports. Weeks2020 registered with the Commission on May 22, 2020 and the candidate subsequently filed his statement of candidacy on May 25, 2020. Assuming Mr. Weeks qualifies as a candidate and because he designated Weeks2020 as his principal campaign committee, Weeks 2020 is “a political committee required to register” and file campaign finance reports with the Commission.<sup>12</sup>

Evidence of Mr. Weeks’s campaign activity strongly suggests that he has received contributions and/or made expenditures in excess of \$5,000 in connection with his candidacy, meaning he is a “candidate” under federal campaign finance law.<sup>13</sup> The campaign accepts contributions through a contribution page on its website<sup>14</sup> and has reportedly engaged in a significant amount of fundraising activity. For example:

- On June 5, 2020, the campaign encouraged people to contribute to the campaign and posted a link to the campaign website.

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<sup>9</sup> *Id.* § 102.1 (requiring a principal campaign committee to file a Statement of Organization no later than ten days after the candidate designates the committee as the principal campaign committee).

<sup>10</sup> *Id.* § 104.5(a)(1); *see also* 52 U.S.C. § 30104(a)(2)(A)(iii).

<sup>11</sup> 11 C.F.R. § 104.5(a)(2); 52 U.S.C. § 30104(a)(2)(A)(i)-(ii).

<sup>12</sup> *See* 11 C.F.R. §§ 101.1(a) (requiring candidates to designate a principal campaign committee within 15 days after becoming a candidate), 102.1(a) (requiring the principal campaign committee to file a Statement of Organization within 10 days of being so designated), 104.1(a) (requiring all political committees that are required to register with the Commission to file campaign finance reports).

<sup>13</sup> 52 U.S.C. § 30101(2); 11 C.F.R. § 100.3(a).

<sup>14</sup> Weeks2020 Contribution Page, <https://secure.anedot.com/weeks-2020/donate> (last accessed Aug. 6, 2020) (via the “Donate Now” link on the home page of the Weeks2020 website, <https://www.weeks2020.com/>).

- On June 7, 2020, the campaign posted a screenshot of a contribution and wrote: “Keep those donations rollin’ in so that we can win this seat for the people this fall. Donate today at weeks2020.com.”
- On June 9, 2020, the campaign acknowledged receiving contributions: “I’d like to personally thank everyone who has been donating.”
- On June 13, 2020, the campaign posted that it was “[l]oving the \$4.20 donations, it’s amazing to see so many,” and wrote the campaign does “accept \$420.00 donations as well.”
- On June 18, 2020, the campaign posted a screenshot of two contributions, of \$100 and \$69, respectively, and declared the campaign had its “best week of fundraising yet.”
- On June 26, 2020, the campaign promised a Weeks2020 t-shirt to any person who contributed \$75 or more.
- On June 30, 2020, the campaign held a “2020 end-of-quarter birthday fundraiser.”
- On July 17, 2020, the campaign wrote about significant planned spending activity: “We can buy 100,000 beautiful green ‘Weeks 2020’ door hangers for \$6000. Please go to weeks2020.com and donate what you can to help our campaign reach the voters!”<sup>15</sup>

This activity demonstrates Mr. Weeks has more than likely crossed the threshold of becoming a “candidate” under the Act and Commission regulations, meaning his principal campaign committee must file campaign finance reports. In fact, the committee *publicly acknowledged* that it is required to file reports with the Commission. The campaign posted a message to its Facebook page on June 26, 2020 that started with the line: “Our deadline to file our fundraising data with the FEC for the 2nd quarter is only 4 days away, we need your help.”<sup>16</sup> While the end of the quarterly reporting period—not the filing deadline—was June 30, 2020, this post demonstrates that Weeks2020 has specific knowledge that it is required to file campaign finance reports with the Commission. Yet Weeks2020 has not filed any reports with the Commission since

<sup>15</sup> See Exhibit 1 (original posts available at <https://www.facebook.com/weeks2020>, last accessed Aug. 6, 2020).

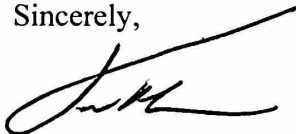
<sup>16</sup> See Exhibit 1, Facebook post dated June 26, 2020.

registering, including the quarterly report that was due on July 15, 2020 and the pre-primary report that was due on July 30, 2020. This lack of disclosure impedes the public interest in transparent financing of federal election campaigns and is a clear violation of the Act and Commission regulations.

### REQUESTED ACTION

As we have shown, there is a strong possibility that Respondents have violated federal law by failing to file two required campaign finance disclosure reports. Complainant respectfully requests that the Commission promptly investigate these violations of the Act and Commission regulations, and that Respondents be enjoined from further violations and fined the maximum amount permitted by law.

Sincerely,



Ken Martin

Eagan, MN 55122

SUBSCRIBED AND SWORN to before me this 14<sup>th</sup> day of August, 2020.



Notary Public

My Commission Expires:

1/31/25



# Exhibit 1





## Adam Weeks for Congress. 2020

@weeks2020 · Political Candidate

Send Message

Home About Events Photos More ▾

Like



### Adam Weeks for Congress. 2020

June 5 · 🌐



There is now a 3rd candidate running for [#Congress](#) in [#MN02](#). On Monday morning, a Republican filed to run against me and my Democratic opponent. Donate to our campaign today at [weeks2020.com](#)! [#Weeks2020](#) [#LegalMarijuanaNow](#) [#LMN](#) [#WeedOutCorruption](#)



WEEKS2020.COM

Home | Adam Weeks for Congress

Adam Weeks understands the struggle of growing up against the odds. Raised by a single mot...



5

1 Share



**Adam Weeks for Congress. 2020**

June 7 · 🌐



Keep those donations rollin' in so that we can win this seat for the people this fall. Donate today at [weeks2020.com](https://weeks2020.com)

**\$4.20**  
to **Weeks 2020**



3

4 Shares



Adam

# Weeks

*for Congress*



## Adam Weeks for Congress. 2020

@weeks2020 · Political Candidate

 Send Message

Home About Events Photos More ▼

 Like



### Adam Weeks for Congress. 2020

June 9 · 🌐




I'd like to personally thank everyone who has been donating. Especially the \$4.20 donations. A campaign unfortunately cannot be run without money. If everyone who reads this were to share it we could make the difference we all need. [Weeks2020.com](https://Weeks2020.com) is where you can donate today.




4

5 Shares

 Like

 Comment

 Share

**Adam Weeks for Congress. 2020**

June 13 · 🌐



Visit [weeks2020.com](https://weeks2020.com) for platform, bio, and to donate. Loving the \$4.20 donations, it's amazing to see so many. We do accept \$420.00 donations as well.

Adam

Weeks

*for Congress*

2020

WEEKS2020.COM

**Home | Adam Weeks for Congress**

Adam Weeks understands the struggle of growing up against the odds. Raised by a single mot...



4



Like



Comment



Share

**Adam Weeks for Congress. 2020**

June 18 · 🌐



Keep them coming. Real change starts with you. [#weeks2020](#) [#MN02](#) best week of fundraising yet. Unfortunately you can't compete without funds. We need our litterateur printed ASAP. Thank you all.

# \$100.00

to **Weeks 2020***General Fund*

# \$69.00

to **Weeks 2020***General Fund*

Like

Comment

Share



## Adam Weeks for Congress. 2020



June 26 · 🌐

Our deadline to file our fundraising data with the FEC for the 2nd quarter is only 4 days away, we need your help. Anyone donating a suggested donation of \$75 or more will receive a Weeks2020 t-shirt. Sizes are pretty varied. To be a real factor in the #MN02 race we need your support. Shirts are green with white print and will be shipped or delivered in person in about 10 days. Thanks Minnesota.



6

2 Comments 2 Shares



Like



Comment



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Most Relevant ▼



Adam Weeks  
I'm my own person.

Like · Reply · 4w



Paul DiNoto  
Democrat or republican?

Like · Reply · 4w

Adam

weeks

*for Congress*

2020



30

Adam

# Weeks

for Congress

2020

TUESDAY, JUNE 30, 2020 AT 8 PM – 11:55 PM CDT


## Weeks 2020 end-of-quarter birthday fundraiser


Online Event

[About](#)
[Discussion](#)
[☆ Interested](#)
[✓ Going](#)


...

### Details

 2 people responded

 Tuesday, June 30, 2020 at 8 PM – 11:55 PM CDT

 Public · Hosted by Adam Weeks for Congress. 2020 and TRU LBRT

 Online Event

As Adam blows out his birthday candles tonight, help us send the establishment up in smoke by donating to our end-of-quarter fundraiser.

Please donate generously today and let Ad... [See More](#)

[Causes](#)
[Online](#)

### Go With Friends

[See All](#)

2

WENT

0

INTERESTED

### Popular With Friends



SUN, AUG 9 AT 2 PM CDT

**United Wards for CPAC  
March/Rally**

Chicago, Illinois



Jay

[☆ Interested](#)


SAT, AUG 29 AT 5 PM CDT

**Black Lives Matter March:  
SHUTDOWN OUR MAGNIFICEN...**

The Wrigley Building



Jay

[☆ Interested](#)


FRI, AUG 14 AT 6 PM CDT

**10 KIL March & Rally 75 Women Of**

### Hosts



Adam Weeks for Congress. 2020

Political Candidate



TRU LBRT

Community Organization