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September 19, 2020

General Counsel  
 Federal Election Commission  
 1050 First Street, NE  
 Washington, D.C. 20463  
 Filed by email to [EnfComplaint@fec.gov](mailto:EnfComplaint@fec.gov)

**MUR 7800**

Complaint against Kanye 2020 (campaign committee  
 ID #C00751701)

To the Commission:

I represent Anne L. Rooney of 806 Fair Oaks Ave., Oak Park, Il 60302, a complainant herein who, pursuant to 52 USC 30101(a)(1) complains against Respondent campaign committee Kanye 2020 (campaign committee ID #C00751701), 3202 Big Horn Ave, Cody, Wyoming 82414, Email: [info@kanye2020.country](mailto:info@kanye2020.country) as follows:

1. On September 16, 2020, the New York Times published an article about the Respondent campaign committee, attached hereto and incorporated herein by reference as Appendix A. Said article stated the fact that “Mercury Public Affairs \* a prominent bipartisan New York political consulting firm,” had provided substantial professional services to the Respondent committee prior to sometime in August 2020. The article quoted a partner at Mercury Public Affairs as saying: “Our role was limited to helping the campaign get started up, primarily by helping to recruit a ballot access team and launch that effort.”
2. Complainant herein is informed and does believe that the services of Mercury Public Affairs were of the type and of such value that any expenditure to (or in-kind contributions in payment to) were required by the campaign finance disclosure laws to have been reported to the Federal Election Commission.

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3. The Complainant herein has reviewed all filings to date of the Respondent Committee and does not find any disclosure of expenditures to (or in-kind payments to) Mercury Public Affairs.
4. Based upon the New York Times article (Appendix A.) and the complainant's own review of already made federal campaign disclosures, Complainant is informed and does believe that said Respondent committee is in violation of the campaign finance disclosure requirements of the laws of the United States for refusing and failing to report disclosure of expenditures to (or in-kind payments to) Mercury Public Affairs.
5. As relief, Complainant prays that the Federal Election Commission require the Respondent campaign committee to immediately disclose the dates, type of services, value of the services, and source of all monies used to pay for said services of Mercury Public Affairs.
6. As further relief, Complainant prays that the Federal Election Commission audit the records of the Respondent campaign committee pursuant to the Commission's powers pursuant to 11 C.F.R. §111.12.
7. As additional relief, Complainant prays that the Federal Election Commission require the Respondent campaign committee to pay a substantial fine or other penalty that is within the Commission's jurisdiction to impose.

Respectfully submitted,



Attorney for Complainant  
Anne L. Rooney

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## Affidavit

State of Illinois )

) SS.

County of Cook )

After first being duly sworn, Complainant Anne L. Rooney deposes and says that she has read the above Federal Election Commission complaint and says that the allegations therein are true to the best of her information and belief.



Anne L. Rooney

Subscribed and sworn to by

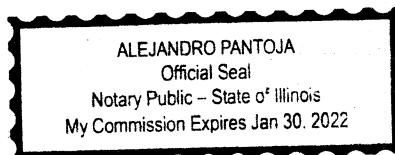
Anne L. Rooney this 21

day of September, 2020.



Notary Public

### SEAL



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## **Appendix A.**

# Kanye West's Perplexing Run as a Potential 2020 Spoiler

Even those around the hip-hop artist struggle to explain his motivations for a presidential candidacy that some Democrats worry could siphon votes from Joe Biden.



By **Danny Hakim and Maggie Haberman**

Sept. 16, 2020, 5:00 a.m. ET

Kanye West wants to bring back prayer in schools, give more government support to religious groups and has even asked his campaign staff to refrain from “fornicating” outside of marriage, according to people aiding his candidacy.

Mr. West, the billionaire hip-hop artist and fashion mogul turned Christian revivalist, is not running for president, but “walking,” as he puts it. He entered the race late and is not going to make the ballot in states including Florida, Texas and Michigan, but he will be on the ballot in others like Colorado, Minnesota and Iowa. Some Democrats fear he could be a spoiler, even if his political appeal is minuscule. Third-party candidacies don’t need that many votes to make an impact, as Jill Stein showed in 2016 and Ralph Nader in 2000.

In calls and texts with The New York Times, and in other recent comments, Mr. West made clear he believes he will become president — eventually — but said almost nothing about what he actually wanted to do if elected. Indeed, Mr. West’s curio candidacy has confused many fans and voters alike. His party is called the Birthday Party. His first piece of campaign art included pictures of that well-known populist Anna Wintour, the editor of Vogue, and of the actress Kirsten Dunst, who was puzzled. (“What’s the message here,” she tweeted, “and why am I apart of it?”)

An inescapable element of Mr. West’s candidacy is his bipolar disorder, which he has spoken about in the past. His wife, Kim Kardashian West, opened up about it for the first time days after Mr. West’s only campaign appearance, in South Carolina,

during which he broke down crying. Writing on Instagram, she called him a “brilliant but complicated person” who has to deal with “pressure and isolation that is heightened by his bipolar disorder.”

Because a variety of allies and supporters of President Trump are working on the ground to advance his campaign, many Democrats view his candidacy as a dirty trick by Republicans, a notion Mr. West has rejected. Still, in a year in which the president is working to undermine confidence in the election, Mr. West’s candidacy is one more point of uncertainty. And many Republicans, including Mr. Trump, appear confident he will siphon votes from Joseph R. Biden Jr., the Democratic nominee, though his appeal could be blunted by some of his conservative positions.

Mr. West has a bare-bones platform, focusing on general objectives like reforming the police, reducing household and student loan debt, and “restoring prayer in the classroom,” with each point reinforced by a bit of scripture. In discussions, the topic he brought up most was his opposition to abortion. He does not, however, want to ban abortion.

“You can’t do that,” he said in a phone call. “I don’t want to ban or stop or point fingers at anything.” Instead, he said he supported “stipends for families that need support, creating orphanages that are really high-level desirable for people to go to, and the redesign of communities and cities in general to be supporting of families.”

He didn’t elaborate on his views on other issues when asked, saying at one point that he had an album to finish.

A number of consulting firms are aiding his candidacy. Mercury Public Affairs, a prominent bipartisan New York political consulting firm, played an organizing role, though the firm was dismissed last month and was reluctant to discuss the matter.

“Our role was limited to helping the campaign get started up, primarily by helping to recruit a ballot access team and launch that effort,” said Michael McKeon, a partner at Mercury. “For a short time, we served as a liaison between the campaign and the team until they established independent relationships. That happened weeks ago, ending our involvement.”

Mr. McKeon would not say why Mercury was not included in the companies that received disbursements in the West campaign’s recent filing to the Federal Election Commission, which showed that Mr. West had lent the campaign nearly \$7 million.



Mr. West during a meeting with President Trump in 2018. A number of Republican operatives have aided efforts to add his name to ballots in various states. Gabriella Demczuk for The New York Times

The filing showed that Mr. West had also brought on both a Republican-oriented firm, the Atlas Strategy Group, and a Democratic-leaning one, Millennial Strategies, to help get him on the ballot. Millennial, however, bailed out after less than a month on the job, shortly after his South Carolina appearance, during which he said that Harriet Tubman “never actually freed the slaves” and that “she just had the slaves go work for other white people.”

Several Republican operatives were subsequently revealed to be aiding efforts to get Mr. West on the ballot, including Lane Ruhland, an election lawyer who has worked for the Trump campaign in Wisconsin; Rachel George, a Republican consultant in Colorado; and Atlas’s Gregg Keller, the former executive director of the American Conservative Union.

Third-party candidacies, of course, can influence the outcome of an election. While a Morning Consult/Politico survey last month of 1,983 registered voters nationwide found that Mr. West had the support of only 2 percent of them, presidential elections in some states have been decided by less. In 2016, Mr. Trump and Hillary Clinton were separated by fewer than 23,000 votes in Wisconsin, where the Libertarian Party candidate, Gary Johnson, won close to 107,000 votes.

“Winning the presidency can come down to a razor-thin margin in a single or handful of states,” Steffen Weiss, the managing director of research science for Morning Consult, said in an email. “Any independent candidate on the ballot in a battleground state, Mr. West included, could be consequential in an otherwise close race.”

Mr. West first called a Times reporter for this article on Aug. 11, close to midnight on the East Coast but a couple of hours earlier in Cody, Wyo., where he lives. He had just tweeted, “I’m willing to do a live interview with the New York Times about my meeting with Jared,” referring to a recent meeting he had with Jared Kushner, Mr. Trump’s son-in-law, that The Times had inquired about.

During the call, Mr. West was upset and insisted on a live interview on Zoom, demanding that the editor of The Times be present as well, to which the Times reporter demurred.

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[Election 2020](#) ›

## Live Updates ›

- 5m ago The Trump campaign uses Big Ten football to take a dig at Biden.
- 55m ago Michael Caputo takes a leave of absence from the Health Department after erratic rants.
- 2h ago An Iowa Republican uses the transitive property to tie his opponent to Ocasio-Cortez and Pelosi.

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“I’m Kanye, who are you?” Mr. West asked, adding, “I’m the head of everything.”

He also expressed anguish about abortion, said he didn’t reflexively support Democrats, and asked, “Does anyone at your magazine believe in Jesus?”

During a series of follow-up texts, Mr. West sent a video commentary about his candidacy from Mike Cernovich, a far-right activist, and also denounced a founder of Planned Parenthood, Margaret Sanger, as “an avowed racist” — she was recently disavowed by the group over her support for eugenics. He also sent myriad statistics about abortion rates among Black women, noting that they are higher than those for other ethnic groups, though the gap has been narrowing for years as abortion rates fall.

“Do you see abortion as the main reason you’re doing the presidential campaign?” he was asked in reply.

“How do these facts make you feel?” Mr. West texted back. “As a person.” “???”

Mr. West was later asked what he saw “as the purpose of the presidential campaign.”

“Do you have children” he asked in response.

“One of them has many of your albums on vinyl and plays them very loud,” the reporter told him. (“Lovely,” he replied.)

The next day he was asked: “with any candidate for any office, I ask - what is it you would actually do?”

He sent a handwritten outline of his plan to build an idyllic “eco-village” called Birthday Lake, which he later tweeted. Mothers could “safely experience pregnancy & birth” there, and children could be cared for afterward. He would not say if he envisioned the government building such places.

On another day, Mr. West was asked to react to two common questions about his candidacy: Why is he running in 2020, since he is too late to get on the ballot in every state? And is he being exploited by Republican operatives?

“Praise God for you” he texted back. “I’m finishing my album and I’m not answering questions this morning.” He added, “The first question is incorrect as I am already on some ballots,” using an emoji with a slight smile.



Mr. West, who has become a Christian revivalist, at a “Sunday service” performance in Paris in February. Valerio Mezzanotti for The New York Times

The Times put similar questions to John Boyd, a music manager who is an adviser to Mr. West, specifically asking why the performer was entering the race so late in the process.

“That’s you and I, the way we look at time,” said Mr. Boyd, who was with Mr. West in South Carolina.

“Kanye doesn’t look at time like that,” Mr. Boyd added. “For him, any time is a good time. He doesn’t look at time the way we look at time. For him, it probably wasn’t even an issue. That’s my humble perspective. If it were me, I would be thinking about — it’s too late, or this, or that. But that’s me. I’m not Kanye.”

Mr. West offered further detail during a recent interview with Nick Cannon, the actor and podcast host, in which he was dismissive of Mr. Biden, and said: “Let me tell you who’s the most racist, the liberal racist. When a white person can tell me you’re going to split the vote, better not step past the line, boy.”

He also said his political aspirations would not end in 2020.

“The reason why I know eventually — eventually could be three months, eventually could be three and a half years — the reason why I eventually will make a great president is because I’m sensitive,” Mr. West said. “I’m here to serve. Even as a Gemini, I feel the energy in the room, I read body language, I read this energy, and I hurt. I hurt for the country, I hurt not just Black people, but all people of America. And I hurt for all people of the world.”

Danny Hakim is an investigative reporter for the business section. He has been a European economics correspondent and bureau chief in Albany and Detroit. He was also a lead reporter on the team awarded the 2009 Pulitzer Prize for Breaking News. [@dannyhakim](#) . Facebook

Maggie Haberman is a White House correspondent. She joined The Times in 2015 as a campaign correspondent and was part of a team that won a Pulitzer Prize in 2018 for reporting on President Trump’s advisers and their connections to Russia. [@maggieNYT](#)

# Our 2020 Election Guide

Updated Sept. 16, 2020

## The Latest

At a town hall event, President Trump faced tough questions from undecided voters. [The primary season has ended](#), with victories in Delaware for Senator Chris Coons and Sarah McBride, a transgender candidate for state legislature.

## Paths to 270

Joe Biden and Donald Trump need 270 electoral votes to reach the White House. Try building [your own coalition of battleground states](#) to see potential outcomes.

## Voting Deadlines

Early voting for the presidential election starts in September in some states. Take a look at [key dates where you live](#). If you’re voting by mail, [it’s risky to procrastinate](#).



**Joe Biden**

Democrat



**Donald Trump**

Republican

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