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November 3, 2020

**VIA E-MAIL**

Jeff S. Jordan  
Assistant General Counsel  
[cela@fec.gov](mailto:cela@fec.gov)  
Federal Elections Commission  
Office of Complaints Examination & Legal  
Administration  
1050 First Street, NE  
Washington DC 20463

Re: MUR 7816

Dear Mr. Jordan:

Our office represents Dan Feehan and the Friends of Dan Feehan campaign committee.<sup>1</sup> We write in response to your October 19, 2020 letter regarding the complaint filed by Congressman Jim Hagedorn. The complaint is meritless and should be dismissed.

The complaint alleges that salary and wage payments to Mr. Feehan from 2017 to 2019 were not paid as compensation for *bona fide* work and, thus, constitute excess campaign contributions to Mr. Feehan's campaign. This is false. Mr. Feehan performed *bona fide* work for both Leadership for Educational Equity ("LEE") and New Politics Leadership Academy ("NPLA") and the salaries and wages he received were paid exclusively as compensation for such work.

As an initial matter, the complaint grossly overstates the payments to Mr. Feehan. The financial disclosures filed with the U.S. House of Representatives on October 31, 2019 initially double counted compensation paid to Mr. Feehan by reflecting the amounts paid in 2019 in the columns for both the current year and the preceding year. *See* Declaration of Daniel Feehan ("Feehan Decl.") at ¶ 2; Ex. 1. Mr. Feehan and his campaign discovered this error and submitted corrected disclosures by September 28, 2020—eleven days before the complaint was signed by Mr. Hagedorn. Feehan Decl. at ¶ 2; Ex. 2. The updated disclosure confirms that Mr. Feehan was paid a total of \$184,500 by LEE and NPLA in 2018 and 2019; not \$349,500 as shown in the initial report. *Id.*

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<sup>1</sup> See the enclosed Statement of Designation of Counsel.

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Although the complaint focuses on the payments from LEE and NPLA, it seeks to cast doubt on all compensation paid to Mr. Feehan since 2017. To avoid any doubt regarding the validity of these payments, the following summarizes the *bona fide* work Mr. Feehan performed for each organization:

**Leadership for Educational Equity – \$50,000 (2017); \$120,000 (2019)**

- In 2017, Mr. Feehan was a consultant for Leadership for Educational Equity (“LEE”) where he was responsible for assisting with LEE’s Veteran’s Initiative. Feehan Decl. at ¶ 5. Specifically, Mr. Feehan worked on developing curriculum and programs to engage Teach for America alumni who were military veterans interested in continuing their public service. *Id.* Mr. Feehan was paid \$50,000 for these services. *Id.* In 2019, Mr. Feehan was employed by LEE where he was responsible for designing a campaign internship program that allowed Teach for America alumni to get experience with political campaigns while also continuing his work assisting with LEE’s Veteran’s Initiative. *Id.* Mr. Feehan was paid \$120,000 for these services. *Id.* Mr. Feehan’s compensation from LEE was paid completely independent of his candidacy. *Id.*

**Sheffield Asset Management LLC – \$875 (2017)**

- In 2017, Mr. Feehan was a consultant for Sheffield Asset Management LLC where he reviewed and provided feedback for Department of Defense procurement procedures. Feehan Decl. at ¶ 6. Mr. Feehan was paid \$875 for these services. *Id.* Mr. Feehan’s compensation from Sheffield Asset Management was paid completely independent of his candidacy. *Id.*

**Wildflower Schools – \$900 (2017)**

- In 2017, Mr. Feehan was a consultant for Wildflower Schools where he was responsible for developing a program to help qualified military spouses gain licensure as Montessori teachers and determining the locations where the programs should be launched and expanded. Feehan Decl. at ¶ 7. Mr. Feehan was paid \$900 for these services. *Id.* Mr. Feehan’s compensation from Wildflower Schools was paid completely independent of his candidacy. *Id.*

**Center for New American Security – \$7,916 (2017); \$55,412 (2018)**

- In 2017 and 2018, Mr. Feehan was a Senior Adjunct Fellow for the Center for New American Security (“CNAS”) where he was responsible for contributing to and writing various research projects for CNAS focused on civil-military relations. Feehan Decl. at ¶ 8. Mr. Feehan was paid a total of \$63,328 (\$7,916 in 2017 and \$55,412 in 2018) for these services. *Id.* Mr. Feehan’s compensation from CNAS was paid completely independent of his candidacy. *Id.*

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**New Politics Leadership Academy – \$9,000 (2018); \$55,500 (2019)**

- After the November 2018 general election and in 2019, Mr. Feehan was a Senior Fellow for New Politics Leadership Academy (“NPLA”) where he researched the effects of the “urban-rural” divide using his experience as a candidate for Congress in 2018 along with sophisticated regression analysis. Feehan Decl. at ¶ 9. In addition, Mr. Feehan led trainings as a co-facilitator for NPLA’s “Foundations” program, which provides leadership training and support for military veterans, AmeriCorps alumni, and Peace Corps alumni considering running for public office in the future. *Id.* Mr. Feehan was paid a total of \$64,500 for these services. *Id.* Mr. Feehan’s compensation from NPLA was paid completely independent of his candidacy. *Id.*

All compensation paid to Mr. Feehan since 2017 was the result of *bona fide* employment that is genuinely independent of his candidacy and was made exclusively in consideration for the services Mr. Feehan provided to each organization. There is no basis to conclude that Mr. Feehan violated the Federal Election Campaign Act and, therefore, the complaint should be dismissed.

Please feel free to contact me with any questions.

Thank you.

Very truly yours,

LOCKRIDGE GRINDAL NAUEN P.L.L.P.



Charles N. Nauen

Enclosures

c: D. Feehan  
Friends of Dan Feehan  
D. Zoll