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FEDERAL ELECTION COMMISSION

MARCH 17, 2021 2:34 PM

March 12, 2021

OFFICE OF GENERAL COUNSEL

Office of General Counsel

MUR 7891

Federal Election Commission 1050 First Street, NE Washington, DC 20463

To whom it may concern:

I am writing to file a formal complaint against Dan Feehan, who was the Democrat candidate to Congress in Minnesota's First District, and the Friends of Dan Feehan campaign committee.

During the 2020 primary and general election cycles, Mr. Feehan and his campaign committee received in-kind labor contributions from three individuals who were compensated by two non-profit entities. In the final receipt and expenditure report for 2020 that was filed on January 31, 2021, none of these in-kind contributions were reported.

- 1) Micah Joselow, compensated by Leadership for Educational Equity, a 501(c)(4) organization as a Fellow, and who worked on the Feehan campaign from June thru November 2020.
- 2) Christina Beros, compensated by Leadership for Educational Equity, a 501(c)(4) organization as a Fellow, and who worked on the Feehan campaign from July thru November 2020.
- 3) Monali Bhakta, compensated by National Lead for America, a 501(c)(3) organization as a Fellow, and who worked on the Feehan campaign from April thru November 2020.

I have attached three slides which provide further detail on these in-kind contributions for your review.

In addition, it is highly likely that each of these individuals provided labor valued more than the \$5,800 contribution limit for both the primary and general election campaigns. For example, if Mr. Joselow worked full-time for five months at 40 hours per week and would have been compensated for the labor at \$30 per hour (which is a conservative rate), the value of the in-kind contribution would've been approximately \$26,000. My understanding is that the Feehan campaign committee should've compensated Mr. Joselow the difference between the in-kind contribution and the \$5,800 contribution limit, or around \$20,000.

I request that you investigate this matter since it is blatantly unfair in closely contested Congressional races such as this one was to utilize material amounts of labor, funded by outside parties, in excess of the contribution limits and failing to report it to the FEC.

Sincerely,

Subscribed and sworn to before me on this

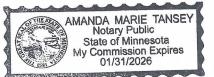
17 day of March, 2021

Randal D. Schreiner

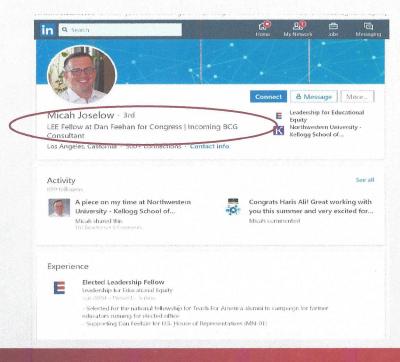
Mahtomedi, MN 55115

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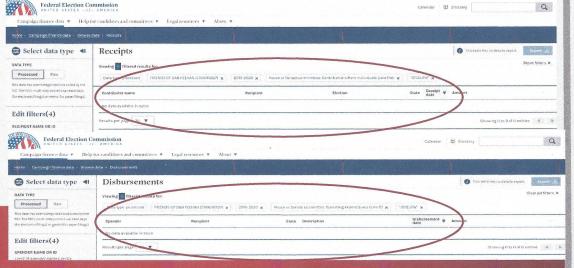
Amunu Marie Tamas



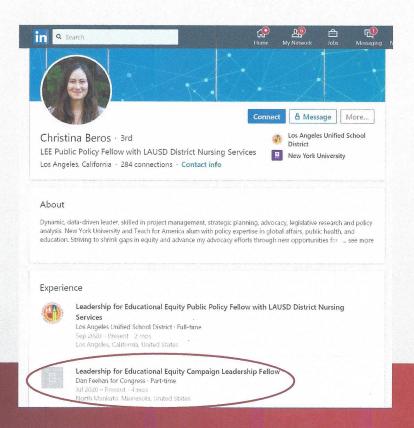
LEADERSHIP FOR EDUCATIONAL EQUITY (LEE) THE CURIOUS CASE OF MICAH JOSELOW



- MR JOSELOW RECEIVED A FELLOWSHIP FROM LEE TO WORK SPECIFICALLY ON MR FEEHAN'S CAMPAIGN AS SHOWN ON HIS PROFILE ON LINKED-IN
- PER HIS REPRESENTATION, HE STARTED WORKING ON THE CAMPAIGN IN JUNE 2020
- THIS IS AN IN-KIND CONTRIBUTION TO THE CAMPAIGN THAT MUST BE DISCLOSED AND IS LIMITED BY FEC REGULATIONS
- THE MOST RECEIPT AND EXPENDITURE FEC FILING THRU DECEMBER 31, 2020 SHOWED NO IN-KIND DISCLOSURES OF MR JOSELOW'S INVOLVEMENT



LEADERSHIP FOR EDUCATIONAL EQUITY (LEE) THE CURIOUS CASE OF CHRISTINA BEROS



- MS BEROS RECEIVED A FELLOWSHIP FROM LEE TO WORK SPECIFICALLY ON MR FEEHAN'S CAMPAIGN AS SHOWN ON HER PROFILE ON LINKED-IN
- PER HER REPRESENTATION, SHE STARTED WORKING ON THE CAMPAIGN IN JULY 2020
- THIS IS AN IN-KIND CONTRIBUTION TO THE CAMPAIGN THAT MUST BE DISCLOSED AND IS LIMITED BY FEC REGULATIONS
- THE MOST RECEIPT AND EXPENDITURE FEC FILING THRU DECEMBER 31, 2020 SHOWED NO IN-KIND DISCLOSURES OF MS BEROS' INVOLVEMENT



NATIONAL LEAD FOR AMERICA (NLFA) ANOTHER CURIOUS CASE - MONALI BHAKTA

