



**FEDERAL ELECTION COMMISSION**  
Washington, DC 20463

1 **TO:** The Commission

2 **FROM:** Charles Kitcher *CK by JK*  
3 Associate General Counsel for Enforcement

4 Jin Lee *JK*  
5 Deputy Associate General Counsel for Enforcement

6 Peter G. Blumberg *PGB*  
7 Assistant General Counsel

8 Justine A. di Giovanni *JAG*  
9 Attorney

10 **RE:** MUR 7901 (Ethan Owens, *et al.*)

11 **SUBJECT:** Intent to Name and Notify Additional Respondent and Notify Respondent of  
12 Additional Violations

13 **DATE:** July 25, 2022

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14 This matter arose from a Reports Analysis Division (“RAD”) referral of the Adam  
15 Kokesh American Referendum Project and Angela Thornton in her official capacity as treasurer  
16 (the “Committee”), the authorized committee for Adam Kokesh’s 2020 presidential campaign.<sup>1</sup>  
17 The Commission previously found reason to believe that: (1) Ethan Owens, the Committee’s  
18 named treasurer, and Angela Fisher, its campaign manager, violated 52 U.S.C. § 30102(b)(3) and  
19 11 C.F.R. § 102.15 by commingling campaign funds with personal funds; (2) Ethan Owens  
20 violated 52 U.S.C. § 30102(c), (d) and 11 C.F.R. § 102.9 by failing to keep and maintain  
21 adequate records; and (3) Ethan Owens violated 52 U.S.C. § 30104(b) and 11 C.F.R. § 104.3 by  
22 failing to accurately report receipts, disbursements, and loans.<sup>2</sup>

23 The Commission took no action at that time regarding potential violations by the  
24 Committee of: (1) 52 U.S.C. § 30102(h)(1) and 11 C.F.R. § 103.3 by failing to deposit receipts in  
25 an account at a properly designated campaign depository; (2) 52 U.S.C. § 30102(b)(3) and  
26 11 C.F.R. § 102.15 by failing to keep campaign funds segregated from the personal funds of any  
27 individual; (3) 52 U.S.C. § 30102(a) and 11 C.F.R. § 102.7(b) by making disbursements during a

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<sup>1</sup> Referral (Aug. 20, 2018).

<sup>2</sup> Certification ¶ 2 (May 5, 2021).

1 period in which it had no treasurer; (4) 52 U.S.C. § 30102(c), (d) and 11 C.F.R. § 102.9 by  
 2 failing to keep and maintain adequate records; and (5) 52 U.S.C. § 30104(b) and 11 C.F.R.  
 3 § 104.3 by failing to file accurate reports concerning the Committee’s receipts, disbursements,  
 4 and loans.<sup>3</sup> Pursuant to the Commission’s findings, the Office of General Counsel commenced  
 5 an investigation to determine the full scope of Owens’s and Fisher’s violations.

6 We deposed Owens and Fisher on May 6, 2022. During her deposition, Fisher disclosed  
 7 that, while she worked for the Committee, Adam Kokesh was receiving approximately \$10,000  
 8 per month in cryptocurrency from Roger Ver.<sup>4</sup> Fisher also stated that Kokesh “was going to lend  
 9 the campaign [this] \$10,000 a month stipend” and “that was [from] where he was funding his  
 10 campaign events, that’s how he was able to hire and pay staff.”<sup>5</sup> Ver is a cryptocurrency  
 11 entrepreneur who renounced his U.S. citizenship in 2014.<sup>6</sup> He supported Kokesh’s candidacy in  
 12 2018.<sup>7</sup> Fisher did testify that Ver’s stipend to Kokesh was for Kokesh to “run a national  
 13 campaign to increase visibility of cryptocurrency,” but explained that he did so by “us[ing] the  
 14 presidential campaign as his national campaign to tour and to raise visibility about  
 15 cryptocurrencies.”<sup>8</sup> The Committee has not reported any contributions from Ver,<sup>9</sup> but over the  
 16 course of the campaign, it reported receiving \$175,830.50 from Kokesh, of which \$148,693.97 is  
 17 noted as being in the form of Bitcoin.<sup>10</sup>

18 Fisher also testified that Kokesh maintained an account with a cryptocurrency site called  
 19 “Steemit,” and that he “had a significant amount of donations accrue through Steemit” which

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<sup>3</sup> *Id.*

<sup>4</sup> Fisher Dep. at 34:5-8, 36:1-5 (May 6, 2022).

<sup>5</sup> *Id.* at 35:8-10; 91:24-25,

<sup>6</sup> See Cyrus Farivar, *Bitcoin Investor Who Renounced US Citizenship Now Can’t Get Back In*, ARS TECHNICA (Jan. 7, 2015), <https://arstechnica.com/tech-policy/2015/01/bitcoin-investor-who-renounced-us-citizenship-now-cant-get-back-in/>; Roger Ver (@rogerkver), TWITTER (Jan. 14, 2015, 8:56 AM), <https://twitter.com/rogerkver/status/555362718866087936> (“I renounced by US citizenship for many reasons.”); London Real, *Why I Renounced My US Citizenship us [trash can emoji] Roger Ver On His Prison Experience* at 3:26, YOUTUBE (Aug. 13, 2021), <https://www.youtube.com/watch?v=kApf5j-clzE> (showing Ver stating, “The prison experience definitely made me eager to renounce my U.S. citizenship. And then I have this additional added benefit that . . . I’m no longer on the hook for all these crazy U.S. taxes and regulations as well”).

<sup>7</sup> Roger Ver (@rogerkver), TWITTER (May 11, 2018, 11 :42 AM), <https://twitter.com/rogerkver/status/994966024444305409> (“Help us crowd fund a peaceful, responsible dissolution of the entire federal government via @adamkokesh[.] kokeshforpresident.com[.]”). Ver’s Twitter account is verified, which indicates that Twitter has confirmed his identity and that the account is authentic. See *About Verified Accounts*, TWITTER HELP CENTER, <https://help.twitter.com/en/managing-your-account/about-twitter-verified-accounts> (last visited July 21, 2022).

<sup>8</sup> Fisher Dep. at 39:7-17.

<sup>9</sup> *FEC Receipts: Filtered Results*, FEC.GOV, [https://www.fec.gov/data/receipts/?data\\_type=processed&committee\\_id=C00662197&contributor\\_name=ver](https://www.fec.gov/data/receipts/?data_type=processed&committee_id=C00662197&contributor_name=ver) (last visited July 21, 2022) (showing zero results for contributions made to the Committee from any source by the name “Ver”).

<sup>10</sup> *FEC Receipts: Filtered Results*, FEC.GOV, [https://www.fec.gov/data/receipts/?data\\_type=processed&committee\\_id=C00662197&contributor\\_name=kokesh](https://www.fec.gov/data/receipts/?data_type=processed&committee_id=C00662197&contributor_name=kokesh) (last visited July 21, 2022) (showing 116 contributions to the Committee from Kokesh between 2017 and 2020).

1 were not deposited in the account Fisher maintained for the Committee.<sup>11</sup> None of the  
2 Committee's reported receipts mention Steemit or Steem, the currency associated with the  
3 Steemit platform.<sup>12</sup> Fisher further testified that Kokesh held a fundraising poker tournament  
4 event in Acapulco, Mexico, where he raised approximately \$7,000 from relatively large donors  
5 that was never deposited in the campaign account, and about which she was given no real  
6 details.<sup>13</sup> The Committee does not appear to have reported any receipts that it noted as coming  
7 from Acapulco, Mexico, or a poker tournament.<sup>14</sup>

8 In light of the information obtained during the deposition, there appear to be credible  
9 allegations that Roger Ver may have made, and Kokesh and the Committee may have received,  
10 prohibited foreign national contributions. It also appears that the Committee may not have  
11 reported the alleged contributions from Ver or any other cryptocurrency receipts. We intend to  
12 notify Ver, Kokesh, and the Committee of the possible violations in order to afford them the  
13 opportunity to respond to the information if they wish to do so.<sup>15</sup> Based on the available  
14 information and their responses, we will then proceed with any appropriate recommendations to  
15 the Commission. We intend to circulate recommendations at the conclusion of the period for  
16 responding. We will also update the Commission on the results of the investigation with respect  
17 to the Commission's reason-to-believe findings.

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<sup>11</sup> Fisher Dep. at 38:17-24.

<sup>12</sup> *FEC Receipts: Filtered Results*, FEC.GOV, [https://www.fec.gov/data/receipts/?data\\_type=processed&committee\\_id=C00662197](https://www.fec.gov/data/receipts/?data_type=processed&committee_id=C00662197) (last visited July 21, 2022) (showing all Committee-reported receipts).

<sup>13</sup> Fisher Dep. at 30:4-13, 38:1-8, 126:16-25

<sup>14</sup> *FEC Receipts: Filtered Results*, FEC.GOV, [https://www.fec.gov/data/receipts/?data\\_type=processed&committee\\_id=C00662197](https://www.fec.gov/data/receipts/?data_type=processed&committee_id=C00662197) (last visited July 21, 2022) (showing all Committee-reported receipts).

<sup>15</sup> This is consistent with past practice. *See, e.g.*, Memorandum to the Commission Regarding Intent to Name and Notify Additional Respondents and Notify Respondent of Additional Violations (June 7, 2019), MUR 7226 (Michael Fleck, *et al.*).