

**RECEIVED**

FEDERAL ELECTION COMMISSION

**MUR 7907**

MAY 18, 2021 10:43 AM

OFFICE OF GENERAL COUNSEL

To Whom It May Concern:

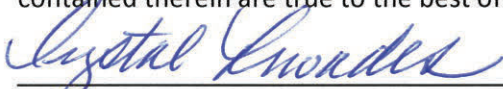
May 18, 2021

I wish to file a complaint against the Nebraska Democratic Party.

On January 26, 2021 the FEC sent a RFAI (IDENTIFICATION NUMBER: C00039880) to the Nebraska Democratic Party (NDP). Item 5 requests additional information pursuant to 11 CFR 300.33 (c)(2) which requires salaries and benefits for employees who spend more than 25% of their compensated time in a given month of Federal Election Activity (FEA) be paid from a federal account. As the former chair of the Douglas County Democratic Party, I have firsthand knowledge that many of the employees listed were spending more than 25% of their time of FEA and have provided exhibits from public websites.

1. Exhibit #1 – "Growing Our Party to Win" dated June 29, 2020 is a fundraising document found on the NDP website which welcomes 14 new hires and explains they will be engaged in Get Out the Vote activities in NE CD1 and CD2. The employees referenced are Peter Coyne, Drew Rodriguez, Fatima Flores-Lagunas, Giselle Bergmeier, Preston Love, Adonna Bryant, Alejandra Escobar, Nathan Johnson, and Jaden Wade.
2. In addition to the employees listed above the following employees also worked more than 25% of their time on the NE CD2 race. Including: John Santner, Julio Gonzalez-Virgen, Wellesley Michael, and Riley Kessler.
3. Exhibit #2 is a screen print from the NDP website listing many of these employees as working on the coordinated campaign.
4. Exhibit #3 is a screen print of the office hours of Giselle Bergmeier for NE CD2 race.
5. Exhibit #4 is a screen print from facebook made by NE CD2 candidate affirming Jaden Perkins (Wade) is an organizer for the campaign.
6. Exhibit #5 is a screen print from facebook made by CD2 candidate affirming Fatima Flores-Lagunas as a field director for the campaign.

I Crystal Rhoades do swear (or affirm) that I am the complainant as alleged above and this complaint and all attachments thereto have been examined by me and that the allegations contained therein are true to the best of my knowledge and belief under penalty of perjury



Crystal Rhoades

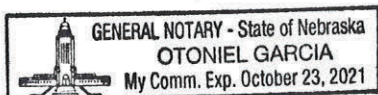
Omaha, NE 68106

Signed and sworn before me this day of



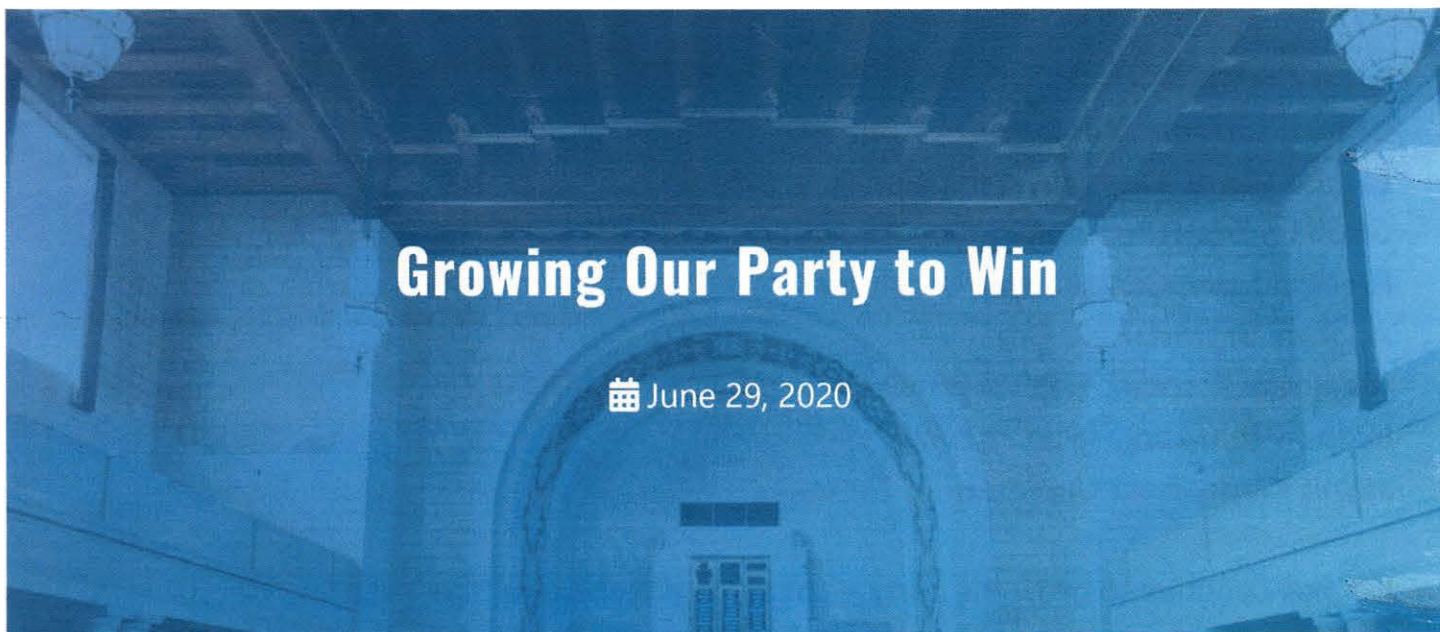
5/18/2021

Notary Public



*Exhibit #1*

Menu



The Nebraska Democratic Party is excited to announce investments into our state's Get-Out The-Vote efforts as we head toward the Nov. 3 General Election.

Our NDP team is now a strong and diverse team of 14 staff members to help us elect Democrats up and down the ballot this November — including reclaiming the "Blue Dot" in Congressional District 2.

Chair Jane Kleeb welcomes the investments, "Our party is growing and building every single day in order to bridge urban and rural voters and elect Democrats up and down the ballot. National partners recognize the work we've put in to build up our state party's infrastructure and we intend to make history together by sending the first women — Kate Bolz and Kara Eastman — to represent the First and Second Congressional Districts."

### **Become a Nebraska Blue monthly donor.**

Working with committed Nebraska donors alongside national partners — the Democratic Congressional Campaign Committee, the Democratic National Committee and the team of Vice President Joe Biden — we have gained additional resources that made several new hires possible and to expand our Block Captain, Voter Guide and Vote-By-Mail programs.





Please join the party in welcoming new members to our strong and diverse campaign team:

**Peter Coyne**, Operations Director

**Drew Rodriguez**, Regional Field Director

**Fatima Flores-Lagunas**, Campaign Field Director

**Giselle Bergmeier**, Mobilization Director

**Preston Love**, Constituency Organizer

**Adonna Bryant**, Field Organizer

**Alejandra Escobar**, Field Organizer

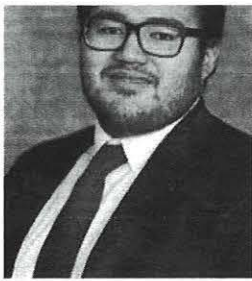
**Nathan Johnson**, Field Organizer

**Jaden Wade**, Field Organizer

Help us continue to grow the party — [become a Nebraska Blue monthly donor today.](#)

LIKE THIS ARTICLE?



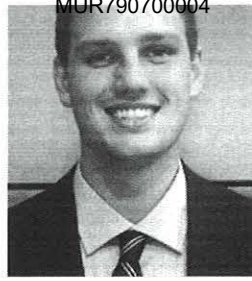


**Ron Rivera**

FIELD AND DATA DIRECTOR

402-686-9094

Ronr@NebraskaDemocrats.org



**Drew Rodriguez**

REGIONAL FIELD DIRECTOR

drew@nebraskademocrats.org



**Fatima Flores-Lagunas**

COORDINATED CAMPAIGN FIELD  
DIRECTOR

Fatima@nebraskademocrats.org



**Giselle Bergmeier**

COORDINATED CAMPAIGN  
MOBILIZATION DIRECTOR

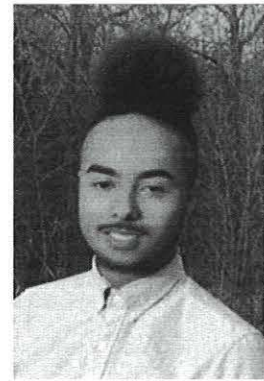
Giselle@nebraskademocrats.org



**Alejandra Escobar**

COORDINATED CAMPAIGN FIELD  
ORGANIZER

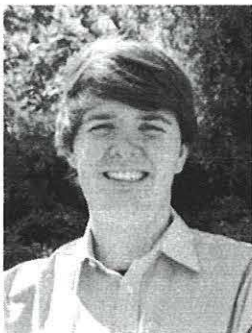
alejandra@NebraskaDemocrats.org



**Jaden Wade**

COORDINATED CAMPAIGN FIELD  
ORGANIZER

jaden@NebraskaDemocrats.org



**Nathan Johnson**

COORDINATED CAMPAIGN FIELD  
ORGANIZER

nathan@nebraskademocrats.org



**Adonna Bryant**

COORDINATED CAMPAIGN FIELD  
ORGANIZER

adonna@nebraskademocrats.org



**Gina Frank**

COORDINATED CAMPAIGN FIELD  
ORGANIZER

gina@NebraskaDemocrats.org



MUR790700004

Exhibit #2



The Party ▾

Our Dems ▾

Take Action ▾

Get News ▾

Contact

Contribute



Exhibit #3



Signups: ☆☆☆

Log in

# Giselle Bergmeier Office Hours

Virtual Meeting · Hosted by Kara Eastman for Congress



## Time

**Mondays,  
Tuesdays and  
Thursdays**  
Multiple times  
available

## Location

**Virtual event**  
Join from anywhere  
Hosted in Omaha,  
NE 68106

## About this event

Have any questions about upcoming volunteer events or just need some additional training? I can help! Sign up here to chat with me.

## ADA accessibility

Unknown [Show details](#)

### SIGN UP WITH KARA EASTMAN FOR CONGRESS

First name \*

Last name \*

Email \*

Mobile number \*

ZIP code \*

### Available times

- ☒ Mon, Jul 27, 10:00am–10:30am CDT  
2 spots left
- ☒ Mon, Jul 27, 10:30am–11:00am CDT  
2 spots left
- ☐ Tue, Jul 28, 4:00pm–4:30pm CDT  
2 spots left
- ☐ Tue, Jul 28, 4:30pm–5:00pm CDT  
2 spots left
- ☐ Thu, Jul 30, 12:00pm–12:30pm CDT  
2 spots left
- ☐ Thu, Jul 30, 12:30pm–1:00pm CDT  
2 spots left



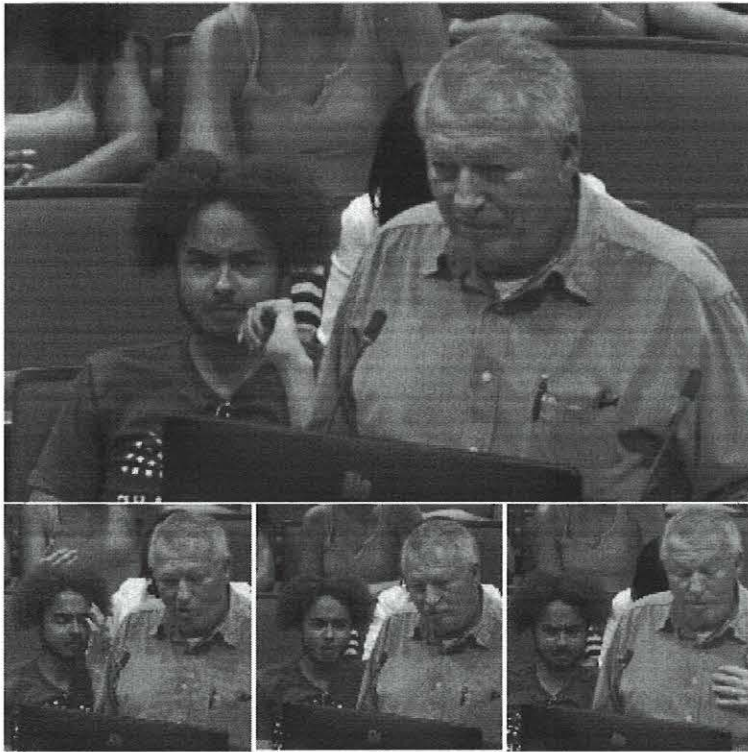
## Exhibit #4



Alejandra Escobar

June 2 · 🌐

Jaden Perkins at the city council meeting today. His face expressions are a whole mood. 🤔



Kara Eastman 🌐

June 2 · 🌐

This is our organizer Jaden (with the purple shirt and cool hair) at an Omaha City Council meeting just now!!!! 🤔🤔🤔

This is what Jaden's face looks like when someone perpetuates strange Trump talking points...



52

5 Comments



Like



Comment



Share

View comments

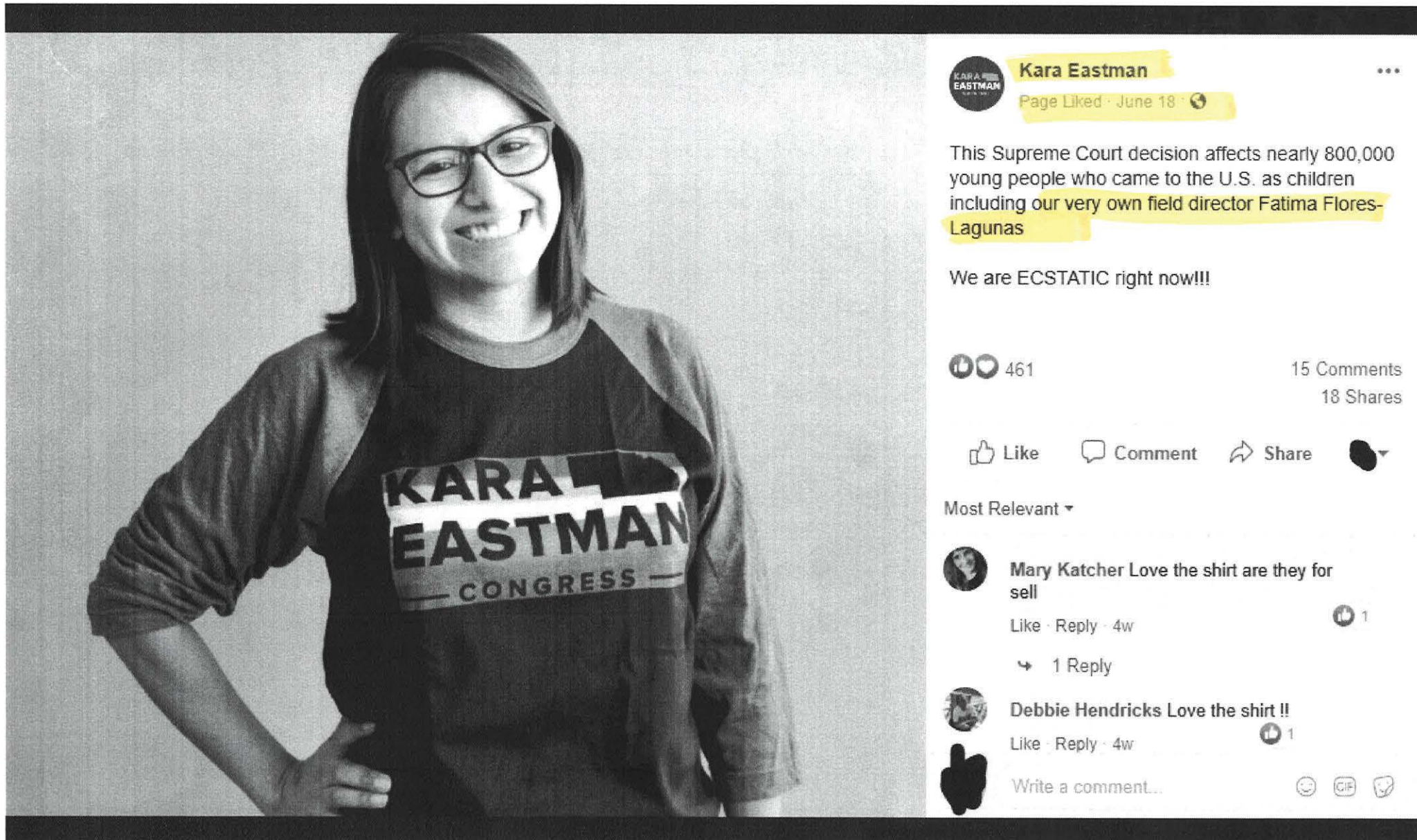


Write a comment...

Press Enter to post



Exhibit #5

**Kara Eastman**

Page Liked · June 18 · 🌐

This Supreme Court decision affects nearly 800,000 young people who came to the U.S. as children including our very own field director Fatima Flores-Lagunas

We are ECSTATIC right now!!!

461

15 Comments  
18 Shares

Like

Comment

Share



Most Relevant ▾



Mary Katcher Love the shirt are they for sell

Like · Reply · 4w

1

↩ 1 Reply



Debbie Hendricks Love the shirt !!

Like · Reply · 4w

1



Write a comment...

