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Attorney for Plaintiff

MUR 7963

EDWARD HARKINS	:	FEDERAL ELECTION COMMISSION
	:	
V.	:	
	:	
SALEM SNOW, RESPONDENT	:	
	:	
SALEM FOR CONGRESS, RESPONDENT	:	
	:	
ZANE KNIGHT, RESPONDENT	:	

COMPLAINT

Edward Harkins, by and through his attorney, R. Emmett Madden, Esquire, respectfully brings this complaint before the Federal Election Commission, respectfully representing as follows:

PARTIES

1. Edward Harkins is a resident of and registered voter in Pennsylvania's 2nd congressional district.
2. Respondent Salem Snow is a candidate to the United States Congress in Pennsylvania's 2nd congressional district.
3. Respondent Salem for Congress is an authorized political action committee registered

with the Federal Election Commission formed by Salem Snow to operate on his behalf in assisting him in his campaign for election to the United States House of Representatives, with an address of P.O. Box 29335, Philadelphia, PA 19125.

4. Respondent Zane Knight is listed as the Treasurer for Salem for Congress, and under the provisions of Federal Election Commission regulations, is responsible for signing and filing all required reports and statements on time and complying with all other applicable laws and regulations.

FACTUAL BACKGROUND

5. On July 29, 2021 Respondent Salem Snow sent an email (a copy of said email is attached hereto and incorporated herein by reference, marked as Exhibit A).
6. Said email noted that it was being sent from Salem Snow and the email address of the sender was team@salemforcongress.com. The domain "salemforcongress.com" is associated with and controlled by Respondent Salem for Congress.
7. Said email had a logo saying "Salem Snow, Democrat for Congress PA-2" in a format substantially the same as the logo on Respondent Salem for Congress's website.
8. The email ends with the writer's identification of "Salem Snow."
9. In the body of the email Respondent Salem Snow makes the following claim:
"As it stands, we need to raise another \$8,000 in order to meet our monthly fundraising goal for July"
10. On July 31, 2021, Respondent Salem Snow sent an email (a copy of said email is attached hereto and incorporated herein by reference, marked as Exhibit B).

11. Said email noted that it was being sent from Salem Snow and the email address of the sender was team@salemforcongress.com. The domain "salemforcongress.com" is associated with and controlled by Respondent Salem for Congress.
12. Said email had a logo saying "Salem Snow, Democrat for Congress PA-2" in a format substantially the same as the logo on Respondent Salem for Congress's website.
13. The email ends with the writer's identification of "In these Streets, Salem Snow."
14. In the body of the email Respondent Salem Snow makes the following claim:

"...we have just a few more hours to raise the \$5,322 we need to reach our goal."
15. The implicit claim within both emails referenced as Exhibit A and Exhibit B is that between July 29, 2021 and July 31, 2021, Respondent Salem Snow and Respondent Salem for Congress raised a total of \$2,678 in new contributions, bringing the stated amount of contributions needed to reach the end of month goal referenced in Exhibit A of \$8,000 down to the \$5,322 left to raise referenced in Exhibit B.
16. The email referenced as Exhibit A further notes that Respondent Salem Snow and Respondent Salem for Congress "need to raise another \$8,000", implying that Respondent Salem Snow and Respondent Salem for Congress had already successfully raised that amount previously.
17. On August 31, 2021 Respondent Salem Snow sent an email (a copy of said email is attached hereto and incorporated herein by reference, marked as Exhibit C).
18. Said email noted that it was being sent from "Team Salem Finance HQ" and the email address of the sender was team@salemforcongress.com. The domain

“saalemforcongress.com” is associated with and controlled by Respondent Salem for Congress.

19. Said email had a logo saying “Salem Snow, Democrat for Congress PA-2” in a format substantially the same as the logo on Respondent Salem for Congress’s website.

20. The email ends with the writer’s identification of “Team Salem.”

21. In the body of the email the following claim is made:

“...we are now only \$1,632 away from the goal we set for online donations”

22. Later in the body of the email referenced as Exhibit C, text claiming to be from a previous email from Respondent Salem Snow, dated August 30, 2021 makes the following claim:

“We are only \$4,400 away from reaching our online fundraising goal for August.”

23. The implicit claim within the email referenced as Exhibit C is that between August 30, 2021 and August 31, 2021, Respondent Salem Snow and Respondent Salem for Congress raised a total of \$2,768 in new contributions, bring the stated amount needed to reach the end of month goal referenced in the email dated August 30, 2021 from \$4,400 down to the \$1,632 amount referenced in the email dated August 31, 2021.

24. On September 29, 2021 Respondent Salem Snow sent an email (a copy of said email is attached hereto and incorporated herein by reference, marked as Exhibit D).

25. Said email noted that it was being sent from Salem Snow and the email address of the sender was team@saalemforcongress.com. The domain “saalemforcongress.com” is associated with and controlled by Respondent Salem for Congress)

26. Said email had a logo saying “Salem Snow, Democrat for Congress PA-2” in a format substantially the same as the logo on Respondent Salem for Congress’s website.

27. The email ends with the writer's identification of "Salem."
28. In the body of the email Respondent Salem Snow makes the following claim:

"If we can raise another \$10,000 by tomorrow at midnight, it will set us up for a strong race." implying that Respondent Salem Snow and Respondent Salem for Congress had already successfully raised that amount previously.
29. On November 24, 2021 Respondent Salem Snow sent an email (a copy of said email is attached hereto and incorporated herein by reference, marked as Exhibit E).
30. Said email noted that it was being sent from Salem Snow and the email address of the sender was team@salemforcongress.com. The domain "salemforcongress.com" is associated with and controlled by Respondent Salem for Congress.
31. Said email had a logo saying "Salem Snow, Democrat for Congress PA-2" in a format substantially the same as the logo on Respondent Salem for Congress's website.
32. The email ends with the writer's identification of "In these Streets, Salem Snow."
33. In the body of the email Respondent Salem Snow makes the following claim:
34. "We need to bring in AT LEAST another \$9,000 before the month closes out." implying that Respondent Salem Snow and Respondent Salem for Congress had already successfully raised that amount previously.
35. Taken together, the contents of emails referenced in this complaint as Exhibits A, B, C, D and E demonstrate that Respondent Salem Snow and Respondent Salem for Congress have raised in excess of \$10,000, and as much as \$32,446 if each amount of money claimed raised from each Exhibit is taken as a standalone figure.
36. On December 27, 2021 Respondent Salem Snow sent an email (a copy of said email is attached hereto and incorporated herein by reference, marked as Exhibit F).

37. Said email noted that it was being sent from Salem Snow and the email address of the sender was info@salemforcongress.com. The domain "salemforcongress.com" is associated with and controlled by Respondent Salem for Congress)
38. The email ends with the writer's identification of "Let's do this! Salem Snow."
39. In the body of the email Respondent Salem Snow makes the following statement:
"As we near the final days of December (our final FEC filing in 2021), we MUST make a big statement with our numbers, but I cannot do this work alone!"
40. The statement made in the email referenced as Exhibit F demonstrates that respondent Salem Snow and Respondent Salem for Congress have an understanding of both FEC filing deadlines and filing requirements, and imply that previous campaign finance report filings have been submitted to the FEC.
41. On June 28, 2021, July 29, 2021 and July 31, 2021, Respondent Salem Snow sent emails (a copy of said emails are attached hereto and incorporated herein by reference, marked as Exhibit A, Exhibit B and Exhibit G).
42. Said emails noted that they were being sent from Salem Snow and the email address of the senders was team@salemforcongress.com. The domain "salemforcongress.com" is associated with and controlled by Respondent Salem for Congress.
43. Said emails had a logo saying "Salem Snow, Democrat for Congress PA-2" in a format substantially the same as the logo on Respondent Salem for Congress's website.
44. Said emails end with the writer's identification of "Salem Snow."
45. The emails referenced as Exhibits A, B and G lack any "Paid For" or similar disclaimer clearly indicating who paid or is responsible for the emails.

46. On September 30, 2021, Respondent Salem Snow and Respondent Salem for Congress sent an unsolicited mass text message to recipients (a copy of said text message is attached hereto and incorporated herein by reference, marked as Exhibit H).
47. Said text message clearly identified the sender as Salem Snow, and claims “our FEC deadline is hours away.”
48. Said text message included a “remove2quit” option, suggesting that said text message was automated and sent to a large number of people through a service paid for by Respondent Salem Snow and Respondent Salem for Congress.
49. In early 2021 (exact date unknown), Respondent Salem Snow and Respondent Salem for Congress posted a Facebook status on the Salem for Congress Facebook page linking to a January 27, 2021 article in The Northeast Times, a local Philadelphia newspaper (a copy of said Facebook status along with a link to the article noted in the status is attached hereto and incorporated herein by reference, marked as Exhibit I).
50. The status clearly notes that the article is “Sponsored” and “Paid for by Salem for Congress”, indicating that the status was being more widely circulated as a paid advertisement funded by Respondent Salem for Congress through Facebook.
51. Taken together, Exhibits H and I illustrate that Respondent Salem Snow and Respondent Salem for Congress have actively spent campaign funds, in addition to claims noted in Exhibits throughout the rest of this complaint that they have raised in excess of \$10,000.
52. As of February 22, 2022, Respondent Salem Snow, Respondent Salem for Congress and Respondent Zane Knight have not filed any campaign finance reports with the Federal Election Commission for any election cycle.

LEGAL ISSUES AND VIOLATIONS

53. Federal Election Commission regulations provide that an individual running for federal office must register and file financial reports when he or she raises or spends more than \$5,000 in contributions or expenditures.
54. Federal Election Commission regulations further provide that any public communication made by a political committee—including communications that do not expressly advocate the election or defeat of a clearly identified federal candidate or solicit a contribution—must display a disclaimer.
55. Respondent Salem Snow, Respondent Salem for Congress and Respondent Zane Knight violated Federal Election Commission regulations by raising or spending in excess of \$5,000 in campaign contributions in 2021, while failing to file any campaign finance reports with the Federal Election Commission.
56. Respondent Salem Snow and Respondent Salem for Congress further violated Federal Election Commission regulations by mass distributing several pieces of electronic mail (referenced as Exhibits A, B, and G in this complaint) that failed to include any disclaimer noting the source of these public communications.
57. Respondent Salem Snow and Respondent Salem for Congress demonstrated a clear understanding of FEC filing requirements and deadlines in the email referenced as Exhibit F, and falsely implied in this email that FEC campaign finance reports had previously been filed.

RELIEF REQUESTED

The complainant respectfully requests that the Federal Election Commission investigate these violations, that the appropriate respondents be sanctioned as the FEC deems appropriate, that the appropriate respondents be fined the maximum amount permitted by law, and that the respondents be enjoined from further violations of Federal Election Commission regulations and other applicable law.

Respectfully submitted by:



R. EMMETT MADDEN, ESQUIRE

THE PHILLY LAWYERS

Attorney I.D. No. 86894

711 West Avenue

Jenkintown, PA 19046

Tele: 215-884-9300


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Email: emadden@ThePhillyLawyers.com

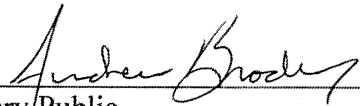
Attorney for Edward Harkins

VERIFICATION

The Complainant, Edward Harkins, hereby swears and verifies that the information contained in this complaint is true and correct to the best of his knowledge and belief.


Edward Harkins

Sworn and subscribed before me this 22nd day of February, 2022


Notary Public

Commonwealth of Pennsylvania - Notary Seal
ANDREW BRODEN, Notary Public
Philadelphia County
My Commission Expires October 12, 2024
Commission Number 1301374

EXHIBIT A

From: Salem Snow team@salemforcongress.com
Subject: Scott, we can't mess this up.
Date: July 29, 2021 at 12:25 PM
To: [REDACTED]



[REDACTED] -- All over the country, there are more progressive and insurgent campaigns than ever before.

These candidates are running on the people's mandate. Candidates who see healthcare and housing as human rights. Candidates who are fighting for living wages, educational opportunities and a livable planet. **Candidates like me.**

What we are witnessing; what we aim to achieve in our campaign for PA-02 isn't about being trendy or sounding woke.

This is a movement born out of frustration with the status quo, the massive inequities and an opportunity to do better.

[As the first month of Q3 comes to a close, I am asking you to be a part of this movement, please don't sit this out.](#)

We can't mess this up. We must all fight for structural change while demanding accountability from our leaders. We must redefine what it means to be a "representative." But in order to achieve this vision we must meet the political machine with a movement.

So, here's the truth -- we really need your help.

As it stands, we need to raise another \$8,000 in order to meet our monthly fundraising goal for July. Our campaign doesn't accept a dime of corporate PAC money, so we are relying on \$2 and \$3 contributions from supporters like you to keep our operations going.

Will you contribute any grassroots amount to our movement today?

If you've saved your payment information with ActBlue Express, your donation will go through immediately:

\$2	\$5
\$10	\$25
\$50	Other

This race, this movement isn't about "left or right," it's about improving the quality of life for every American. Candidates like me are running because we know if we fight hard enough, things don't have to stay the same. They can be better. Much better.

Let's change the narrative and make history in 2022.

Salem Snow

Support Salem's campaign

Salem Snow is a progressive Democrat running for Congress in Pennsylvania's Second district, which covers north and eastern Philadelphia. If you believe, like we do, that it's time for working people across the country to have a voice in Congress to drown out the corporate influence and corruption, we invite you to join us by pitching in today. Thank you!

DONATE >>

Visit Salem's website



Salem for Congress
PO Box 29335
Philadelphia, PA 19125
United States

If you believe you received this message in error or wish to no longer receive email from us, please
unsubscribe using the link below.

[unsubscribe](#)

EXHIBIT B

From: Salem Snow team@salemforcongress.com
Subject: We're in these streets
Date: July 31, 2021 at 11:48 AM
To: [REDACTED]



Salem Snow

DEMOCRAT FOR CONGRESS PA-2

[REDACTED] -- My team has been working hard to organize our community, reach voters all across Philly, and secured some big support for our campaign.

This month, we garnered the support from local leaders in the community and national organizations fighting for progressive change.

Last week, my team and I took to the streets and joined millions of people, all across the country, to demand Congress and President Biden FINALLY pass Medicare for All.





Now, we need your help to finish July strong by helping close our \$5,322 fundraising goal we must hit by midnight tonight.

The money we raise between now and midnight will go towards purchasing campaign literature, digital ad buys and much needed campaign staff to help us expand our operations here in PA-02.

██████, we have just a few more hours to raise the \$5,322 we need to reach our goal. Can you chip in \$5 today to help us close the gap?

Contribute \$5

It's time to build grassroots, progressive energy in Philly. Your help is urgently needed.

██████, I know you're probably getting a ton of these emails asking for money right now. But the work we do is essential to changing the future of Philly, our country and humanity.

Anything you are able to give right now will help immensely.

Can I count on your contribution today to help us raise the \$5,322 we need to hit our fundraising goal before tomorrow at midnight?

If you've saved your payment information with ActBlue Express, your donation will go through immediately:

\$10	\$25
\$50	\$100
\$250	Other

In These Streets,

Salem Snow

Support Salem's campaign

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[DONATE >>](#)

Visit Salem's website



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United States

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EXHIBIT C

From: Team Salem Finance HQ team@salemforcongress.com
Subject: Fwd: We can do so much better than "just another Democrat."
Date: August 31, 2021 at 4:25 PM
To: [REDACTED]



Hello [REDACTED],

We wanted to reach out to you on Salem's behalf, as he continues to make donor calls to ensure we hit our critical fundraising goal for the month of August.

Thanks to several of you who already contributed \$4, we are now only \$1,632 away from the goal we set for online donations.

We've never had this small of a gap to close, and we are grateful to everyone who has made August so successful.

[If you haven't yet, can you chip in \\$4 or \\$5 before Midnight tonight?](#)

Grateful for each of you.

- Team Salem

-----Begin forwarded message-----

From: Salem Snow <team@salemforcongress.com>
Date: Mon, Aug 30, 2021 at 12:17 PM

[REDACTED] -- Thank you to everyone of you who has invested in our campaign for PA-02! We are only \$4,400 away from reaching our online fundraising goal for August

goal for August.

Supporters like you make grassroots campaigns like mine thrive. Which is why I'm asking you just once more to help us get over the finish line for our month of August goal TONIGHT. **And if you haven't been able to contribute yet, I could really use your help today.**

Can you give just \$4 and show my opponent and our critics that it's time for an end to the status quo; that we can do so much better than "just another Democrat?"

Contribute \$4

Every single dollar matters in this race. **With your help we will defeat one of the last remaining pro-life House Democrats in Congress.**

Thank YOU for all you do for me and other progressive candidates.

In these streets,

Salem Snow

Support Salem's campaign

Salem Snow is a progressive Democrat running for Congress in Pennsylvania's Second district, which covers north and eastern Philadelphia. If you believe, like we do, that it's time for working people across the country to have a voice in Congress to drown out the corporate influence and corruption, we invite you to join us by pitching in today. Thank you!

DONATE >>

Visit Salem's website



Our mailing address is:
Salem for Congress
P.O. Box 29335
Philadelphia, PA 19215

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Paid for by Salem for Congress.

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EXHIBIT D

From: Salem Snow team@salemforcongress.com
Subject: We must seize this opportunity
Date: September 29, 2021 at 11:35 AM
To: [REDACTED]



[REDACTED] -- This is it. No more waiting for a representative who will fight for the progressive values the people of our district believe in.

I've stepped up because we have a climate crisis to urgently address. I'm in this fight because reproductive freedom is under attack. I'm running for Congress because Democrats must follow through with the promises our party made -- promises voters are counting on us to follow through with.

And I'm counting on you to make our 100% people-funded, grassroots campaign possible.

With only two days left in the month, we are still short of our quarterly goal. The people of PA-02 deserve better than lies and empty promises. They deserve a leader who will fight for them, no matter what.

[If we can raise another \\$10,000 by tomorrow at midnight, it will set us up for a strong race. Can you help us close this gap by pitching in \\$100, \\$50, \\$25 or any amount you can today?](#)

My opponent is in lock step with Democrats like Joe Manchin. He's anti-choice, and is funded by corporations and Dark money interests.

His actions and voting record are keeping working people struggling for the basics and stretched too thin, and it has to stop.

This will be an uphill battle, so please chip in what you can today.

This will be an uphill battle, so please chip in what you can today.

If you've saved your payment information with ActBlue Express, your donation will go through immediately:

\$10	\$25
\$50	\$100
\$250	Other

Are you with us?

Salem

Support Salem's campaign

Salem Snow is a progressive Democrat running for Congress in Pennsylvania's Second district, which covers north and eastern Philadelphia. If you believe, like we do, that it's time for working people across the country to have a voice in Congress to drown out the corporate influence and corruption, we invite you to join us by pitching in today. Thank you!

DONATE >>

Visit Salem's website





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Philadelphia, PA 19215

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EXHIBIT E

From: Salem Snow team@salemforcongress.com
Subject: Our opponent runs as a Democrat, but sure acts like a Republican in Congress.
Date: November 24, 2021 at 8:31 AM
To: [REDACTED]



[REDACTED] -- The holiday season is extremely tough for grassroots campaigns like ours. This time of year is hectic and overloaded for most folks. Between travel and family gatherings, politics is not top of mind for the majority of us.

That said, my team really can't afford to fall short in November. We need to bring in AT LEAST another \$9,000 before the month closes out.

Here is why hitting this goal is so important:

Our opponent runs as a Democrat, but behaves like a Republican in Congress. **He has a deeply troubling record on issues such as reproductive justice and LGBTQ+ rights, and he accepts money from the same corporate PACs and high-dollar donors that delivered us Donald Trump.**

If you've saved your payment information with ActBlue Express, your donation will go through immediately:

\$10	\$25
\$50	\$100
\$250	Other

This is not the representation the people of PA-02 deserve, and in a bright blue district like ours, it's completely unnecessary to play GOP-like games.

I'm running to ACTUALLY fight for progressive, Democratic values. I will NOT fold on the social and economic issues our party champions because I believe Democrats cannot falter on the promises of progress we made to voters in 2020.

Working families are counting on our majorities in the House and Senate to deliver; for President Biden to continue on the progress that has been made in the recent passage of the Build Back Better Act. In order to do that, we must defeat representatives who are Democrats in name only.

[Today, I'm asking if you will step up with a \\$25 contribution to our campaign and elect a REAL Democrat to represent the people of North Philly in Congress.](#)

I can't do any of this without you, so thank you for all you do to keep our momentum and our movement going.

In these streets,

Salem Snow

Support Salem's campaign

Salem Snow is a progressive Democrat running for Congress in Pennsylvania's Second district, which covers north and eastern Philadelphia. If you believe, like we do, that it's time for working people across the country to have a voice in Congress to drown out the corporate influence and corruption, we invite you to join us by pitching in today. Thank you!

DONATE



Visit Salem's website



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EXHIBIT F

From: Salem Snow info@salemforcongress.com
Subject: I am not a politician or part of the Democratic establishment.
Date: December 27, 2021 at 1:16 PM
To: [REDACTED]



[REDACTED] -- It's time for a new voice in North Philly. As a working-class candidate who understands the struggles of everyday people, I'm running to give the voters of PA-02 true representation.

I am not a politician or part of the Democratic establishment. I'm running because the system as it is has been an abject failure and it's time to change that.

I know what it's like to struggle, and I'll be guided by how my votes in Congress will impact everyone in our district, *especially* the most vulnerable ones.

[Help me win this seat with a \\$10 donation today!](#)

Your support will help us take this seat and bring a solid and determined voice to Congress. With your help, we will close this year strong and have the resources we need to stand, fight, and WIN in 2022.

If you've saved your payment information with ActBlue Express, your donation will go through immediately.

\$10	\$27
\$50	\$100
\$250	Other

As we near the final days of December (our final FEC filing in 2021), we MUST make a big statement with our numbers, but I cannot do this work alone!

Can I count you today?

Can I count you today?

Let's do this!

Salem Snow

Support Salem's campaign

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DONATE >>

Visit Salem's website

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EXHIBIT G

From: Salem Snow team@salemforcongress.com
Subject: Discrimination is alive and well
Date: June 28, 2021 at 12:45 PM
To: [REDACTED]



[REDACTED] -- Today is the anniversary of the Stonewall Riots -- a protest born out of the LGBTQ+ community's frustration with police brutality and community violence -- I wanted to do a little reflecting.

Less than a year ago, I was assaulted for being openly gay.

My partner and I were walking home when a man began yelling homophobic slurs at us. We told him to leave us alone, but he only became more aggressive. And at the peak of his egregious display, he threw water on me, threatened us with violence, and called me a f****t.

Many people in my community have experiences such as this, ending in real tragedy and physical harm, so I was largely relieved that my situation didn't have a worse outcome. But the most traumatic part of my experience wasn't even what happened, it was thinking about what could have happened.

People should not be traumatized just for existing.

The hard truth: **Almost 1 out of 3 LGBTQ+ folks report having been harassed. They are four times more likely to experience violence than non-LGBTQ+ people.**

[This is why we need policy. This is why we need action. And this is why I'm running. Because my community, every community, deserves visible representation in Congress!](#)

If elected, I would be the first openly LGBTQ+ person in PA's

congressional delegation. It's long past time that we break down the barriers that have held our community down. **But electing openly LGBTQ+ folks isn't the end goal - it's just a few first steps to equality and safety.**

To truly improve outcomes for our community, we need to treat healthcare and housing as a human right, expand legal protections against discrimination and violence, and a public education curriculum that includes LGBTQ+ history, health and culture. But in order to get this done, I'm going to need your help.

[Can I count on you to have my back by chipping in any amount to help us keep this campaign thriving and continue the fight for equality and justice?](#)

If you've saved your payment information with ActBlue Express, your donation will go through immediately:

\$10	\$25
\$50	\$100
\$250	Other

█ in 2021, bigotry is alive and well, even in big Democratic cities like Philadelphia. And while we celebrate the progress that our community and society have made over the years, we also must remember that there is still much work to be done.

In These Streets,

Salem Snow

Support Salem's campaign

Salem Snow is a progressive Democrat running for Congress in Pennsylvania's Second district.

which covers north and eastern Philadelphia. If you believe, like we do, that it's time for working people across the country to have a voice in Congress to drown out the corporate influence and corruption, we invite you to join us by pitching in today. Thank you!

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United States

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EXHIBIT H

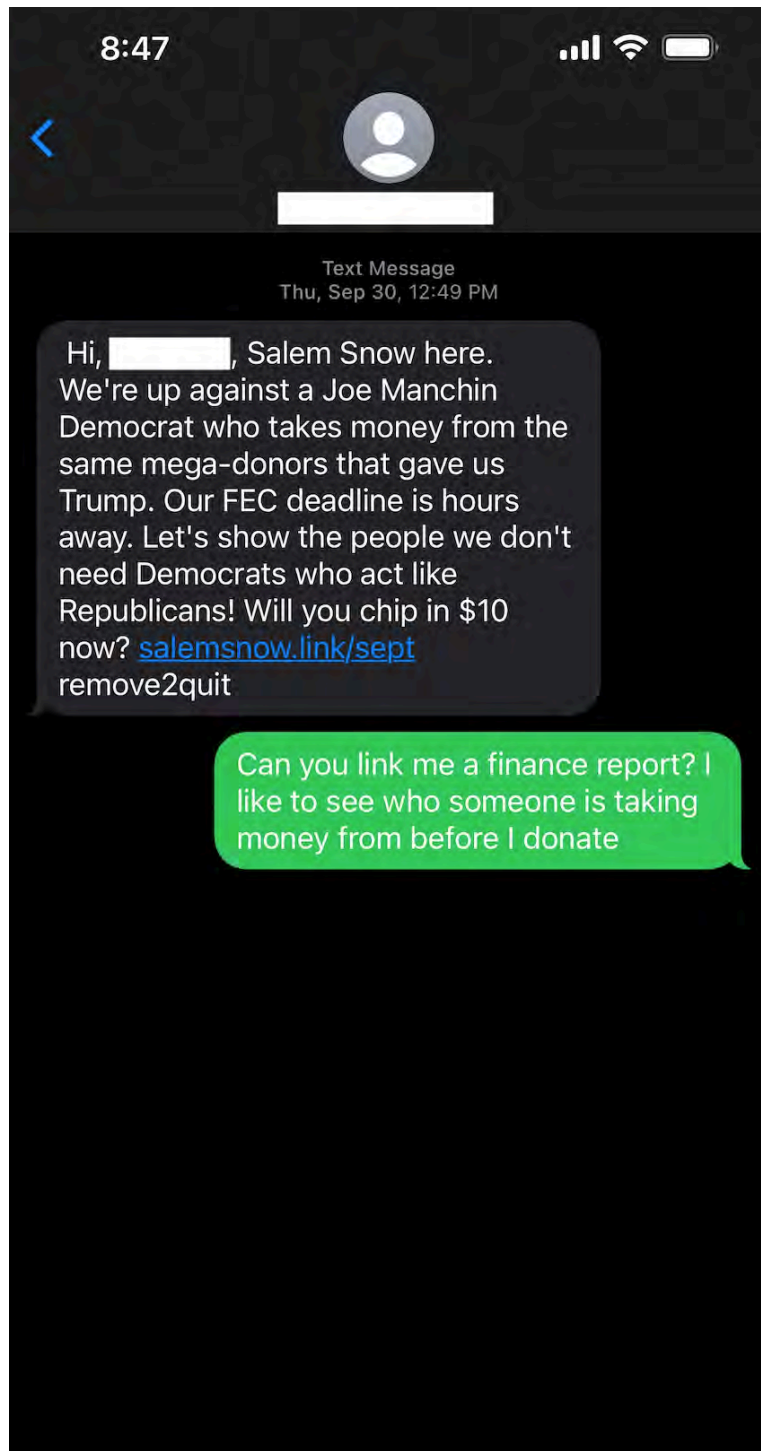






EXHIBIT I




 **Salem For Congress** ⋮
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“Things were rough for working-class folks before COVID, but the pandemic has really highlighted the failures in our system created by corporate politicians,” said Sn... See More





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