

Zane Knight, responding on behalf of
Salem Snow
Zane Knight
& *Salem For Congress*
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United State
info@salemforcongress.com

in response to

Edward Harkins, Complainant

RE: MUR 7963

Salem For Congress, by and through Zane Knight, respectfully brings this response before the Federal Election Commission, respectfully representing as follows:

PARTIES

1. Edward Harkins served in a government relations position with Boilermakers Local 13, chaired Local 13's government affairs committee, and served on their state labor political action committee.
2. Salem Snow was a candidate to the United States Congress in Pennsylvania's 2nd congressional district.
3. Salem for Congress is an authorized political action committee registered with the Federal Election Commission.
4. Zane Knight is listed as the Treasurer for Salem for Congress.

FACTUAL BACKGROUND

1. According to a Fall 2020 report from Boilermakers website, Harkins has a history of political involvement on behalf of his preferred candidates (see; Respondent Exhibit A - copy of referenced text and link to the report).
2. According to that same report, “Harkins is active in LEAP in Washington, D.C. every year, slotting time to speak with every Pennsylvania lawmaker he can fit into his packed schedule” (Respondent Exhibit A).
3. According to the Boilermakers website “LEAP is the Brotherhood’s Legislative Education Action Program — a member-driven effort organized at the local lodge level, guided by the LEAP Executive Committee, and administered by the Department of Government Affairs. LEAP’s primary goal is to ensure jobs and job security through political and legislative action” (see; Respondent Exhibit B - link to the website and copy of referenced text).
4. On April 25 2018, Salem For Congress’s political opponent Brendan Boyle posted to his Facebook page entitled “Congressman Brendan Boyle” a photo of himself with Ed Harkins alongside a caption that reads “International Brotherhood of Boilermakers Local 13 Govt. Affairs Chair Ed Harkens dropped by the DC office today. Ed and I had a good discussion about working together to keep bringing good paying jobs for union members to Pennsylvania.” (see; Respondent Exhibit C - Facebook post from the Facebook page of Congressman Brendan Boyle)
5. The aforementioned statement suggests that Ed Harkins has a positive working political

relationship with Salem For Congress's political opponent as far back as 2018.

6. Said statement also implies that Ed Harkins travelled to DC to meet with Boyle, as Ed Harkins claims to be a resident of the 2nd congressional district of Pennsylvania.
7. On December 20 of 2019, the Salem For Congress Facebook page shared an article with quoted text discussing the announcement of Snow's candidacy for PA-02 in the 2020 cycle, gentrification in the district, and the fact that Snow would be the first openly LGBTQ+ person elected to U.S. Congressional delegation from Pennsylvania (see; Respondent Exhibit D - Salem For Congress Facebook post).
8. A Facebook profile with the name "Ed Harkins" commented on the aforementioned post with the following text: "Didn't you move into an African American neighborhood, that's seeing gentrification push African American families out of that area? Would that make you a part of the gentrification moving into "Olde" Kensington?" (see: Respondent Exhibit E - photo evidence of commentary).
9. Salem Snow is a resident of the Norris Square neighborhood in Philadelphia.
10. Norris Square is not a predominately African American neighborhood; Norris Square is a predominately latino neighborhood (see; Respondent Exhibit F - study indicating ethnic-racial demographics of Norris Square).
11. Both Salem Snow and his partner are of latino descent.
12. Taking 8-11 into consideration with full context, this displays Harkins has a history of targeting and making false public statements related to his preferred candidate's political opponents.
13. Harkins posted Snow's home address in a public setting (see; Respondent Exhibit G - proof of comment).

14. Respondent Exhibit D shows that Snow is an openly LGBTQ+ activist.
15. LGBTQ+ people are disproportionately targeted by acts legally considered violence, harassment, and/or hate crimes.
16. Taking 13-15 into consideration with full context, this displays that Harkins has no issue putting LGBTQ+ people at even higher risk of being targeted for harassment and violence for the political convenience of himself and his allies.
17. Exhibits presented by Complainant are dated back as far as June of 2021.
18. The FEC acknowledged the receiving the filed complaints of MUR 7963 from Complainant on February 23rd, 2022.
19. On February 23rd, 2022, it was announced that the date for petition signatures to get onto the ballot in Pennsylvania would begin on February 25th, 2022.
20. Taken into consideration together, 17-19 implies Harkins had the intent to sabotage the chance of Salem Snow's name appearing on the ballot in Pennsylvania in efforts to ensure that Harkins' political ally Brendan Boyle would win the primary election.

Summary of the Factual Background

Taking 1-16 into consideration with full context, this displays that **A)** Harkins has had a political working relationship with Brendan Boyle - the political opponent of Salem For Congress - since at least 2018, **B)** Harkins has a history of spreading disinformation and otherwise misleading information about Salem Snow that works to the advantage of Harkins' preferred candidate, Brendan Boyle, **C)** Harkins will knowingly put protected minorities and political opponents at risk for the benefit of his political allies, and **D)** Harkins abused the FEC and its processes for the political convenience of benefit of himself and his ally, Brendan Boyle.

Additional Context

1. In Salem Snow's first bid for congress in the 2020 cycle, Salem For Congress did not raise or spend \$5000, and was therefor not required to file with the FEC.
2. In the initial months of Salem Snow's second bid for congress in the 2022 cycle, Salem For Congress was still not required to file with the FEC.
3. In 2021, Salem For Congress made multiple attempts to recruit individuals educated in FEC compliance within the Democratic Party in efforts to prepare to meet compliance requirements.
4. Every individual contacted refused or backed out, but only after long wait times in-between responses.
5. Most contacted individuals refused to work with Salem For Congress because of unidentified "conflicts of interest" or were afraid to work with anyone challenging Brendan Boyle.
6. Since then, Salem For Congress has solidified the ability to submit and upkeep compliance,

and is in the process of getting our finances current with the FEC.

7. For full transparency, Salem For Congress has not fundraised more than \$35,000 in contributions from donors throughout the 2022 cycle.
8. For full transparency, Salem For Congress has received no more than 25 individual contributions that exceed \$200.

Direct Responses to “Factual Background” Claims of the Original MUR 7963 Complaint

1. At no point was it stated or even implied that Salem For Congress had filed or otherwise submitted campaign finance reports to the FEC.
2. While the copies of the emails displayed in Complainant’s Exhibits A, B and G do appear to lack "Paid For" or similar disclaimers due to a seemingly technical error unknown to us until this complaint, Complainant’s Exhibits C, D, E, and F **clearly** indicate who paid and is responsible for the emails, and also implies that the disclaimer is typically applied to emails. Complainant had to go through more than a year’s worth of electronic communications to find 3 pieces of emails that did not properly display the disclaimer due to a seemingly technical error. **Additionally, the political action committee’s name “Salem For Congress” is not only placed in every single email sent alongside its registered mailing address, the required disclaimer is clearly present in multiple links that are required to be visited before donating.**
3. The fact that the text message portrayed in Complainant’s Exhibit H included a "remove2quit" option, **does not** inherently suggest that said text message was automated or sent to a large number of people through a service paid for by Salem Snow and Respondent Salem for Congress - **it only proves that Salem Snow and Salem For Congress clearly give recipients the option to no longer receive text message communications** from Salem For

Congress.

Relief Requested

The respondent respectfully requests that the Federal Election Commission analyze the provided information in this document that serves as a response to our first complaint filed with the FEC, waive any penalties, and consider the matter nothing beyond political opposition taking advantage of missed filing deadlines - which is already in the process of being rectified, as has been previously stated here and communicated with representatives of the FEC.

Respectfully submitted by,

Zane Knight

on behalf of

Salem Snow

Zane Knight

& Salem For Congress

Respondent Exhibit A

The Reporter, Fall 2020 Volume 59 | Number 3

The official publication of the International Brotherhood of Boilermakers, Iron Ship Builders, Blacksmiths, Forgers & Helpers, AFL-CIO/CLC

Link: <https://boilermakers.org/sites/default/files/reporter/Boilermaker-Reporter-V59N3.pdf>

Text References:

Ed Harkins, who until recently headed up L-13's state government affairs committee, encouraged Monahan to run for the statehouse. "When he first became mayor, I saw that as a way for him to get his foot in the door with state legislators," Harkins says. "And it worked out. He would walk into some of those meetings in Harrisburg, he'd mention he was the mayor of Orangeville, and it would open doors for him."

page 14, paragraphs 3-4

"Growing up in a family of labor activists set the stage for Ed Harkins, Local 13 (Philadelphia), to make his mark on local, state and national politics. Union activism is in his blood. "It started before I was in the Boilermakers," Harkins says. "I come from a building trades family that was active in politics. Even as a kid, I always had an interest in watching the news and reading about issues and politics." He's passionate about Pennsylvania and the working men and women in union trades—something that has driven him to log thousands of hours of volunteer work over the years for state Democrats and the Local 13 state government affairs committee. In a roundabout way, Harkins credits former President George W. Bush for ramping up his political involvement as an adult. "I went to vote in a primary in the spring of 2003, shortly after Iraq was invaded," Harkins remembers. "And when I was leaving, this guy was handing out literature for the Democrats. I asked how I

could help out.”

The Pennsylvania Democrats took him up on this offer and put him to work. They appointed Harkins to the position of Democratic committeeman. “It means you’re a liaison between the voters in your precinct and the party,” he explains. He recalls one door-knocking adventure involving an older man, a Korean War vet, who was in serious trouble. The man had been receiving Social Security for about six years when the administration stopped payment. He’d lost his right to his retirement income due to an outstanding criminal charge from 30 years ago. “He was going to lose his house,” Harkins says. To prevent that, he took the man to Allyson Schwartz’s office—the U.S. House member for the 13th District—and talked to one of her aides. Two weeks later the vet called Harkins to thank him for saving his home. “It was the proudest moment in politics I’ve ever had,” Harkins says. “I haven’t been able to top that.” Because he sees what activism can do, Harkins encourages union members political involvement. He admits to “badgering” union brother Dan Engle to run a write-in campaign for Roseto Borough Council the week before the 2017 November election (Engle won!). And for the upcoming November election, he encouraged Bill Monahan to run for a seat in the Pennsylvania House of Representatives. An avid history buff, Harkins understands the principles behind different political theories. He saw what the country could do through the New Deal. He heard stories from his grandfather, a shipyard Boilermaker, and also from his dad. “All that knowledge is what got me involved in politics through the Boilermakers,” he says. Harkins is active in LEAP in Washington, D.C. every year, slotting time to speak with every Pennsylvania law-maker he can fit into his packed schedule. “First time I went to LEAP, I felt I was around rock stars,” Harkins says. “We’re a small building trade union but we had—and still have—this immense talent in our government affairs department.” Former L-13 BM-ST Martin Williams, now the National Coordinator of State Legislative Affairs, M.O.R .E. Work Investment Fund, says that if he

could choose one word to describe Harkins, it would be “dedicated.” “Labor’s history is replete with individuals who were not satisfied with the status quo and believed progress for working people comes with tenacity and sacrifice. Ed is one of those people,” says Williams. “Ed believes that every labor march, phone bank, rally, legislative meeting, candi-date interview—no matter how big or small—is worth it to advance the Boilermakers and the labor movement. He is union through and through and we’re all better for it.”Harkins’ activism has left a legacy in Pennsylvania and in the union. He encourages other union members to con-tinue to fight for working people across the U.S. “As Boilermakers, we’re often fighting as much for the non-union as for the people in unions,” he says. “At the end of the day, we tend to fight for those who still don’t have a voice, because it’s the right thing to do. Raising their wage and benefits packages puts our contractors on a more even keel, and puts less downward pressure on them to reduce our pay and benefits. It makes us stronger.”

Respondent Exhibit B

Boilermakers official website

Link: <https://boilermakers.org/leap>

Text Referenced:

LEAP is the Brotherhood's Legislative Education Action Program — a member-driven effort organized at the local lodge level, guided by the LEAP Executive Committee, and administered by the Department of Government Affairs. LEAP's primary goal is to ensure jobs and job security through political and legislative action.

Respondent Exhibit C

The Facebook page of Congressman Brendan Boyle

Link: <https://boilermakers.org/leap>



Congressman Brendan Boyle

International Brotherhood of Boilermakers Local 13 Govt. Affairs Chair Ed Harkins dropped by the DC office today. Ed and I had a good discussion about working together to keep bringing good paying jobs for union members to Pennsylvania.

Timeline photos · Apr 25, 2018 · 🌐

[View Full Size](#)

Respondent Exhibit D

Facebook post from the Facebook page of Salem For Congress



Salem For Congress

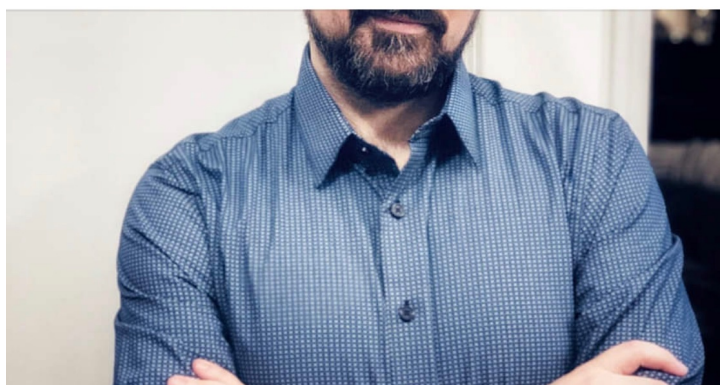
December 21, 2019 at 12:34 AM · 🌐

""The district's average individual income is hovering above \$20k a year," he said in a statement. "When you add in the opioid epidemic, and the fact that developers are displacing people of color and the poor at an alarming rate, what we have is an emergency. And it's being completely ignored by officials like Boyle, who are supposed to be representing us. But he's too busy playing footsie with the establishment."

Snow cited a 2018 list published on govtrack.us that showed Boyle the 64th most conservative member among 200 Democratic House members. He pointed to campaign contributions to Boyle from Goldman Sachs, Verizon and pharmaceutical companies, and vowed not to take corporate money.

"Brendan Boyle is a great talker, but actions speak louder than words" he said.

If elected, Snow would become the state's first openly gay [U.S.] congressman as well as the first millennial to hold the seat. His platform focuses on the Green New Deal, Medicare for All and "Housing For All."



NORTHEASTTIMES.COM

**Kensington democratic socialist to challenge Boyle
- Northeast Times**

Respondent Exhibit E

False statements made by Ed Harkins replying to aforementioned post from Salem For Congress in Respondent Exhibit D

Dec 20, 2019 · 🌐



northeasttimes.com
Kensington democratic socialist to challenge Boyle - Northeast Times

👍 Like 💬 Comment ➦ Share

👍❤️😂 288

48 Shares

All comments ▾



Ed Harkins
Didn't you move into an African American neighborhood, that's seeing gentrification push African American families out of that area? Would that make you a part of the gentrification moving into "Olde" Kensington?

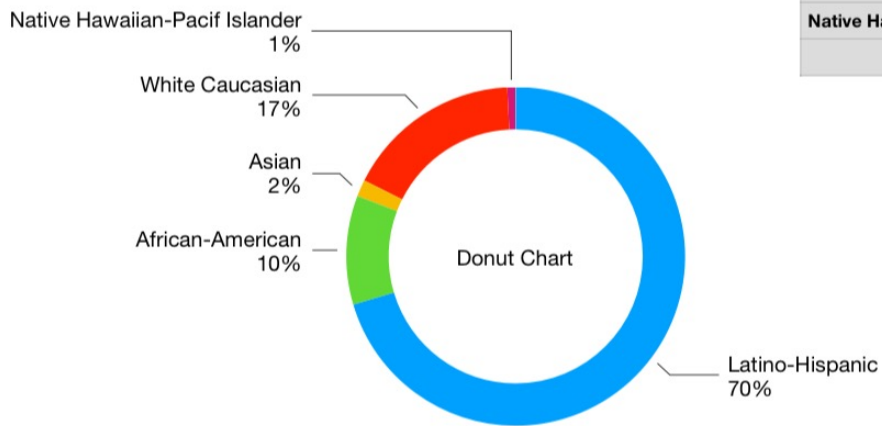
Respondent Exhibit F

Study indicating the racial and/or ethnic demographic of the Norris Square neighborhood

Race-Ethnicity of Respondents: 123

Question-5

Latino-Hispanic	88
African-American	13
Not Hisp or Latino or of Spanish Origin	
Asian	2
White Caucasian	21
Native Hawaiian-Pacif Islander	1



Respondent Exhibit G

Comment from Ed Harkins where he publicly lists candidate's address

Dec 20, 2019 · 🌐



Ed Harkins

Burden of proof, which you think a campaign would be glad to be transparent and offer...

2020 North Howard St. is the candidate's address.

<https://docquery.fec.gov/pdf/174/201912099166168174/201912099166168174.pdf>

