

RECEIVED
FEDERAL ELECTION COMMISSION
APRIL 15, 2022 1:11 PM
OFFICE OF GENERAL COUNSEL

OFFICIAL FEC COMPLAINT

April 15, 2022

MUR 7980

Office of General Counsel
Federal Election Commission
1050 First Street, NE
Washington, DC 20463
ENFCOMPLAINT@FEC.GOV

VIA ELECTRONIC SUBMISSION (1st) and MAIL SUBMISSION (2nd)

FACT PATTERN

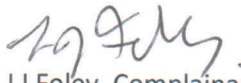
1. On or abouts November 9, 2021 Deborah J. Adeimy of Palm Beach County filed a statement of organization with the Federal Elections Commission to run for US Congress in the State of Florida's currently defined 21st Congressional district.
2. The facts in this document if specific are outlined with any supporting material as direct personal knowledge versus those which if stated are based on information or belief.
3. The respondent at all times are both Deborah Adeimy personally as well as the Deborah Adeimy for Congress Committee.
4. This complaint is NOT a sua sponte submission to be clear.
5. On or abouts April 15, 2022, candidate Deborah Adeimy directed a vendor Orion Printing to mail out a mass mailing post card that was 8.5 x 11 inches to approximately 32,000 specifically identified individuals who are voters in Palm Beach County despite numerous concerns around compliance being communicated to Ms. Adeimy.
6. This mass communication is considered a public communication by a political committee as defined by 11 CFR 100.26 as this communication was sent to more than 500 individuals and the post card was identical from a content perspective with the exception of the target individuals names and address information changing on each piece.
7. This mass communication is also covered under the scope of § 110.11 Communications; advertising; disclaimers (52 U.S.C. 30120).
8. This matter as such falls under the jurisdiction of the Federal Elections Commission.

9. In the days leading up to the directive from Ms. Adeimy to Orion Printing to authorize the distribution of the mass mailing, on or abouts April 7, 2022, Ms. Adeimy had agreed along with her internal team as well as the owner Jennifer Kerbs of the graphic design firm Alpha Graphics who was preparing the creative print ready content for the mass mailing to follow a rigorous controlled process that was established by the campaign's General Consultant to ensure adequate reviews were done and so that there were no potential problems with FECA compliance for communications, advertising, and disclaimers. The process that was agreed to verbally by all parties is described below:
 - a. An initial draft of the desired communication and content would be provided by the campaign's General Consultant as a single point of contact for the campaign to the outside graphic design vendor, Alpha Graphics located in Palm Beach County, Florida. Note: This initial draft had gone through many reviews to ensure the materials would be clear, distinct in terms of disclaimer, etc. The General Consultant on more than four to five verbal discussions repeatedly communicated concerns regarding the disclaimer that is required to the candidate.
 - b. Alpha Graphic's graphic designer would take the mock-up provided by the campaign's single point of contact and create a final camera-ready document that could be reviewed by the campaign
 - c. The General Consultant for the campaign would facilitate the process with the Candidate to review with the candidate the final camera-ready mock-up.
 - d. Any changes or feedback would be discussed between the General Consultant and the Candidate, Deborah Adeimy internally first. This would ensure that since the candidate was a first-time candidate that any communicated changes to the outside vendor Alpha Graphics would not potentially be a FECA violation.
 - e. The General Consultant would submit in writing all agreed to changes to Alpha Graphics in written form as a punch/check list for the graphic designer to work from so it followed a rigorous controlled process, the changes were clear, and the changes were authorized.
10. On Friday, April 8, 2022 at 1:07PM, the graphic designer from Alpha Graphics, Maria Galavis, communicated what was supposed to be a final camera-ready proof to be reviewed. Aside from the fact the document was unprofessional looking compared to the version sent to her by the campaign, the document had serious formatting issues, accuracy issues, etc. it became obvious quickly that there was interference with the agreed controlled process as content had been changed inclusive but not limited to the actual disclaimer on the mass mailing piece by not following the agreed process.
11. The General Consultant communicated these issues to the candidate Ms. Adeimy immediately upon receipt of the document from Maria Galavis, at which time Ms. Adeimy informed the General Consultant she intentionally breached the controlled process taking matters into her own hands and she alone was directing the outside vendor what to do and not to do.

12. During that conversation the General Consultant advised Ms. Adeimy that if she puts inaccurate information out to the public in that document which clearly she had instructed the Graphic Designer to do that given one of the opponents in the Republican Primary was an attorney and another was a multi-millionaire with unlimited funds that she would more than likely get sued for that alone. In addition to communicating the aforementioned, the General Consultant also advised Ms. Adeimy during that call that given the fact the mass mailing communication was a full frontal attack on her Republican Primary Opponents that if she was not compliant with FECA she also faced the likelihood that one or more of her opponents especially the ones just noted would file a FEC Complaint/MUR with the Federal Elections Commission in regards to the disclaimer. The General Consultant pointed out the changes on the disclaimer that Ms. Adeimy had ordered the graphic designer to make which raised red flags.
13. After receiving that advisement Ms. Adeimy informed her General Consultant that she didn't care and that she had intentionally directed against the advisement of the General Consultant to place the disclaimer in as small of font as possible and hidden in the left corner so that it would conceal as much as possible the identity of whom the mailing was from. Once again, the General Consultant re-iterated to Ms. Adeimy that she cannot be deceptive and that it must be changed.
14. In a separate incident on Monday April 11, 2022, the General Consultant tried multiple times to get ahold of Ms. Adeimy via phone when he found out the disclaimer change had still not been made inclusive of texting the repeated warning to Ms. Adeimy and even talking with Ms. Adeimy's friend named Kate.
15. Up until this time the General Consultant acting as the agreed to single point of contact with outside vendors inclusive of the printer Orion Printing discovered that to perpetuate the concealment that Ms. Adeimy also went around the agreed to controls with Orion Printing and met with them giving them instructions without the General Consultant present.
16. Orion Printing had a call on or about the afternoon of April 11, 2022 with the General Consultant post the discussion with Ms. Adeimy and the General Consultant communicated the concerns about the disclaimer being deceptive in size and placement and the printer who handles printing for multiple political candidates in the area agreed that it was not consistent with what they print for other candidates.
17. The General Consultant for Ms. Adeimy's campaign attempted to reach the Campaign's Treasurer, David Satterfield, of Huckaby Davis Lisker, Inc. during the morning of April 12, 2022 prior to printing of the mass mailing being printed and had even ordered all parties the printing was on hold. The General Consultant reached out to David Satterfield via phone since he would be the first person to receive and file a FEC Complaint. The General consultant was unable to reach Satterfield by phone and then emailed him at 9:08 advising her needed a call within 5 minutes. Not getting a phone call back at 11:17AM on April 12, 2022 the General Consultant sent a second email to Satterfield asking who will be handling FEC Complaints and MURS regarding Ms. Adeimy's actions since he had not received a returned phone call.

18. On or abouts 12:10PM on April 12, 2022, eventually David Satterfield returned the call to the General Consultant and was advised that Ms. Adeimy was about to implode her campaign with compliance issues, was out of control, was refusing to listen to compliance concerns, and the General Consultant conveyed that he needed David Satterfield who worked with Ms. Adeimy for more than 6 months to attempt to talk sense into the candidate.
19. As a follow-up to that conversation on the phone, the General Consultant even emailed David Satterfield re-iterating the repeated attempts in regards to this mailer as well as with a previous audio recording on March 29, 2022 to get Ms. Adeimy to include a Paid for By Message in the audio recording against sent to more than 500 people.
20. The email to David Satterfield advised how Ms. Adeimy was intentionally trying to be deceptive with the disclaimer, how she had been advised multiple times to not do that, and was hell bent on breaking the law.
21. Ms. Adeimy informed her General Consultant at 1:52PM on April 12, 2022 that due to his concerns and her behavior of willful violations of the law that the Treasurer was on the verge of resigning.
22. Ms. Adeimy ordered the General Consultant not to communicate any compliance concerns to the treasurer as a way to further conceal her nefarious activities and ensure no one would intervene in any attempt to stop her.
23. Ms. Adeimy has numerous certifications and licenses with the SEC so she CANNOT claim she is ignorant or clueless to the importance of compliance issues as she works in a regulated industry or at least she did up until she was forced to resign the fall of November 2021.

It is unfortunate that this complaint has to be filed but given the reckless mumpsimus and cavalier attitude Ms. Adeimy has demonstrated in regards to FEC compliance and an increase pattern of risk-taking on her part it is imperative action be taken to enforce the statutes. The above facts are mostly direct knowledge unless stipulated as a strong belief based on the evidence at hand.

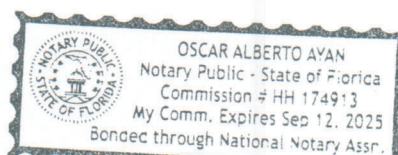

LJ Foley, Complainant

Miami, FL 33177

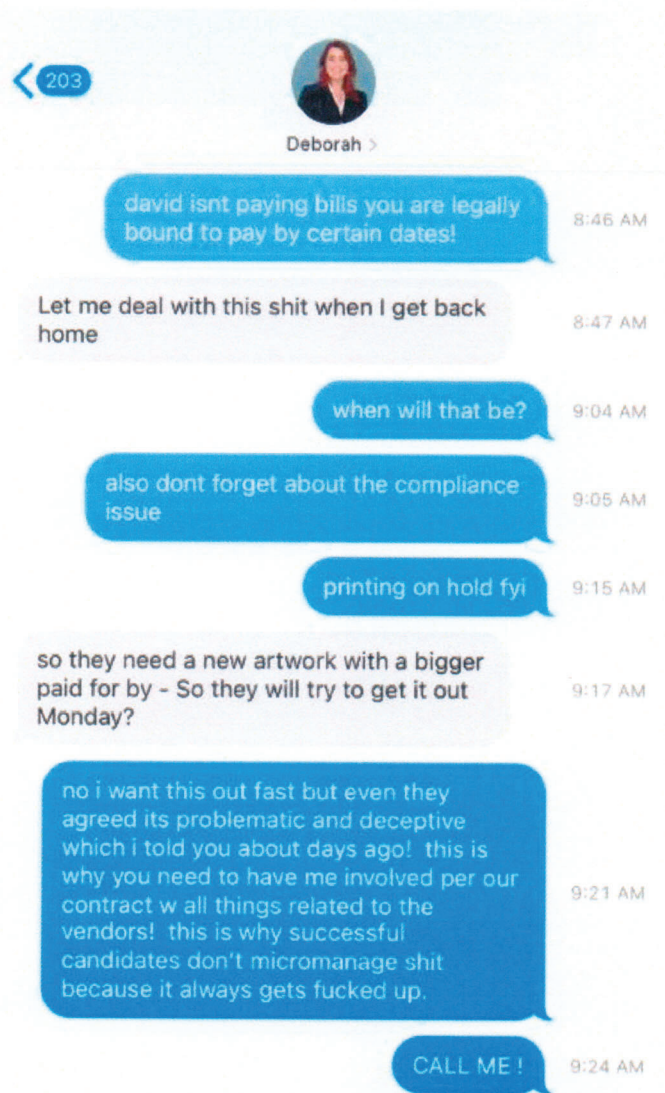
NOTARY CERTIFICATE:

This complaint was signed and sworn to before me on the April 15, 2022 to the best of the complainants knowledge the facts are true under the penalty of perjury.





Appendix 1. Text messages from GC to Ms. Adeimy on Monday April 11, 2022 reminding of compliance issues with mass mailing, in the message it is clear this has been communicated to her repeatedly and going over a number of days.



Appendix 2. Email to Satterfield requesting a discussion to intervene on compliance issues on April 12.



From: **Foley LJ** >

To: **Satterfield David** >

April 12, 2022 at 9:08 AM

**Re: Invoice for Approval for ACH
Payment**

call me plz, need 5 mins.

Appendix 3. Tuesday April 12, 2022 email to Satterfield asking who will respond to FEC Compliant or MUR

From: LJ Foley <lj@voterinfusion.com>
Date: April 12, 2022 at 11:17:38 AM EDT
To: David Satterfield <dsatterfield@hdafec.com>
Subject: FEC Violations/etc

David, do you get the MURs from the FEC or legal process service for the campaign for Deb or is it another party do you know?

please advise
LJ

Appendix 4. Tuesday April 12, 2022 email to Satterfield as follow-up outline continual compliance disregard by Ms. Adeimy amongst other unrelated issues.

Deb's Compliance/Fundraising/Legal Issues

From: **ljfoley**
To: **dsatterfield** <dsatterfield@hdafec.com>
Sent: Tuesday, April 12, 2022 at 1:01 PM
Encrypted: **No**
Signed: **No**
Attachments: VoterInfusion-8.5x11-Proof[2].pdf

Hi David, here is the document we discussed. I'm very nervous about my company's name being in the PDF name too to be honest. My understanding from my own FEC counsel as well as just general history is based on the below (see end of email). I had repeated discussions with Deb on this specific matter that she cannot make this like 7 point font or so hard to read and intentionally conceal it in a corner which is what she stated to me she is trying to do. I spoke with the printer and even they agreed that their other clients don't do this and I asked if they could graphically edit the bottom make it bigger and center and they said yes if they got the go-ahead. I told them to put a hold on this until Deb could get this worked out.. My recommendations multiple times to Deb were that it needs to be at least 12 point font, in a box, and centered at the bottom of the page so it sets somewhat apart from the other contents of the communication. Deb basically went rogue on this and I again sent her an urgent text yesterday afternoon to get this fixed and to be in compliant in addition to talking with her assistant Kate. We already had an issue where I told her in an audio recording at the end, even if it is fast, she should be saying, "this is Deborah Adeimy and I approve of this message" or "Paid for by Deborah Adeimy for Congress" and she stated she was "overriding". I worry that this callous attitude towards compliance is going to require the campaign to set aside large amounts of \$ to deal with MURs and more. As an FYI, this compare contrast will really put a spot light on the other competitors and they will then look for any little thing to go after Deb the only thing I think they can bust on is the Disclaimer being intentionally concealed. One opponent is a Lawyer so costs him nothing to go after and the other's family is worth hundreds of millions of dollars and his mom was one of Trump's Ambassadors so hiring big gun lawyers to nail Deb to the wall for a FEC violation is nothing to them. I was just advised by the Printer that Deb basically told them to just print it. This is very reckless when you have a team of people who throw a red flag on the field saying we have a problem and she just throws caution to the wind.

I asked Deb (because the previous guys apparently never did it) to get me by traunch people she knows or has contacts with that can be in the below tranches. I got big people I'm trying to recruit to help her with all facets of fundraising but they don't think she will even help herself and are all asking me if she has the below basic list that all candidates have. She does not and I've requested this 6 times. I also requested for that March 31st even to make sure (even setup a donation link specific for it) that the hosts and all their friends donate in advance so we had the money in the bag, Deb did nothing (and these are her contacts and friends) to ensure 1 person donated on the links in the week leading up to the event. The people I'm pulling in to add engines to the fundraising plane their attitude to me is if Deb has 30 years experience in Wealth Management she has to know something about money, managing money, and must have "Wealthy" clients that love her as she says why hasn't she approached any of them, why hasn't her family maxed out, if she is claiming her family has 5 generations in palm beach and knows everyone, why aren't deb and her family reaching out to help with connections only they know the name of to create this list and approach. This is literally \$196K sitting on the table. That right there is what I need to do all the voter digital communications to seal

the primary up (text, email, vm, my DSP, hygienics of the data, amends, etc.). I am constantly asking Deb when she is going out to the Breakers for drinks with people, going to this event, that event, etc. what her rake in terms of donations were for that and the answer is always \$0. At this point if there is no end goal for going to an event and no results where deb walks away with at least \$1,000 or at least one person \$2,900 then partying, whooping it up, look at me I'm the vanity candidate is not working and albeit I've given talking points/30 second elevator speech recommendations they are not being used. I don't know if there is a scared position to ask people for \$ but that is what a hungry candidate has to do and the donor's want to hear it from the candidate not from the Treasurer or the GC.

At a tranch of \$5,800 there should be at least 10 people in your network that can donate or \$58,000

At a tranch of \$2,900 there should be at least 20 people in your network that can donate or \$58,000

At a tranch of \$1,000 there should be at least 40 people in your network that can donate or \$40,000

At a tranch of \$500 there should be at least 80 people in your network that can donate or \$40,000

Deb also has it crystal clear in my contract that I have authorization to manage all vendors, invoices, approvals, etc. to make sure we are not short of funds for things we strategically need. She is not letting the pro's do their job and about to implode her own campaign which I don't want to see happen because like we discussed she has no job in financial services anymore and this is ALL she has so she has to succeed. Deb was supposed to make sure my stuff was paid on 4/1 and I even had the TIN for the company in the legally binding contract. I didn't ask her for a retainer so she would have more cash on hand at end of the quarter and agreed to hold off the payment until 4/1 in the contract to help her out. It is like when the lifeguard is trying to save you but the person drowning is kicking the lifeguard in the teeth yet they are the one trying to save you. I cannot for the life of me understand what these other folks even did or why some of this basic stuff I'm having to start from scratch with her on wasn't done. I also on the other hand have to wonder was she doing the same thing and they just threw their hands up in the air. Either way I'm not the kind of guy that tells her what she wants to hear I'm trying to tell her what she needs to hear. I just heard this AM that one of her largest endorsements just pulled the endorsement.

From where I see things and you will have to tell me what her current cash on hand position is that she has by time all is done for quarter end maybe \$70K cash on hand. She needs to pay you probably for March and April and May \$6K, mine is \$12K due on 4/1 and 8,500 on May 1. Just with that we are at \$26K less so \$44K left, and with these other people I think she should only pay for the video so peg that at say \$14K, she has \$30K left. If she blows \$20K on this printing that only leaves her \$10K left and so she is basically dead in the water. This is why I told her albeit it may cost a few bucks more by stretching mailing deliveries out, to only spend \$10K because the buzz will cascade outward and then as the \$ comes in quickly do the other so your not short on funds. I've also told her she needs to earmark funds for travel to DC and other events I can take her to in order to introduce her to Donors.

I'd love your thoughts on the compliance issue or if you have any other clients (that aren't independently wealth) that do NOT build the above list I've been begging her to help me get setup. Need some help man,

thanks

LJ

Special Rules for Printed Communications

In printed communications, the disclaimer must be contained within a printed box set **apart from the contents of the communication. The font size of the disclaimer must be of sufficient size to be "clearly readable" by the recipient of the communication, and the print must have a reasonable degree of color contrast between the background and the printed statement. Black text in 12-point font on a white background is one way to satisfy this requirement for printed material measuring no more than 24 inches x 36 inches.**

**A comparison of Republican Primary Candidates competing to defeat incumbent Democrat
Lois Frankel in FL CD-21 on November 8, 2022.**

VOTER CONSIDERATION	WHEELEN	FRANZESE	ADEIMY	MARKS	DORILAS	BONGI
Knowledge & Time In PB County	20+ Years	6 Mos	Lifetime / 50+ Years	17 Years P/T	1 Year	10+ Years
Family Roots in PB County	None	None	5 Generations	None	None	None
Prior Democrat Voting Record	No	No	No	Y – Hillary 2016	Yes	No
Multi-State Voter Registration	No	Yes – Verified NY/FL	No	No	No	No
Married	Married	Married	Previously	Single	Estranged	Single
Children	2	2	3	0	0	0
Last Employment	Walmart	Natl Bank of Canada	Morgan Stanley	Yoga Studio	Attorney	Tech Co.
Years of Solid Work Experience	6	21	30	8	1	30
Years Military Service	0	0	0	0	5	0
College Graduate	No	Yes	Yes	Yes	Yes	No
Last Known Graduation	Court Ordered Anger Mgmt Class	Amherst & Univ of PA	Loyola / Thomas Edison / FAU	NYU / John Hopkins	FIU/Syracuse	Microsoft Certification
Last Known Profession	None / Volunteer	Bond Trader	Financial Advisor, CFP®, Fiduciary	Yoga Instr.	Lawyer	Tech Consultant
Exaggerates Resume, Biography	Yes	Yes	No	Yes	Yes	No
Bankruptcy or Judgements	Yes	No	No	No	No	No
Criminal Court Records & Arrests	<ul style="list-style-type: none"> • Dom. Violence • Assault/Battery • Burglary • Auto Theft 	No	No	No	No	No
Foreign Entity Associations, Ties	China	China, Canada, Spain, France	None	None	None	None
Palm Beach County Voter Points of Interest	<ul style="list-style-type: none"> • Multiple Criminal Records • Financials • Anger issues • Education • Inexperience 	<ul style="list-style-type: none"> • Mortgage Concerns & FL Residency Issues • Registered Voter in 2 States (NY/FL) • No district knowledge • Spouse Supports "White Fragility", CRT authors 	<ul style="list-style-type: none"> • Knows PB County • 30 Yrs Professional Experience • Mother • Knows Frankel's History • Finance Expert • Most Credentialed 	<ul style="list-style-type: none"> • Didn't Vote for Trump • Democrat • Woke Disney Ties • Inexperience • Silver Spoon 	<ul style="list-style-type: none"> • Lack of Experience • Democrat • Resume Inflater • No District Knowledge 	<ul style="list-style-type: none"> • Didn't Vote for Trump in '16 Pres. Primary • History of Hostile Threats • Education

Note: Voters may conduct own research and ask candidates regarding the above, which is based on public information, social media, internet, and candidate websites.



SAVE THE DATE POSTCARD
Critical Republican Primary Candidate Comparison and Early Voting Information

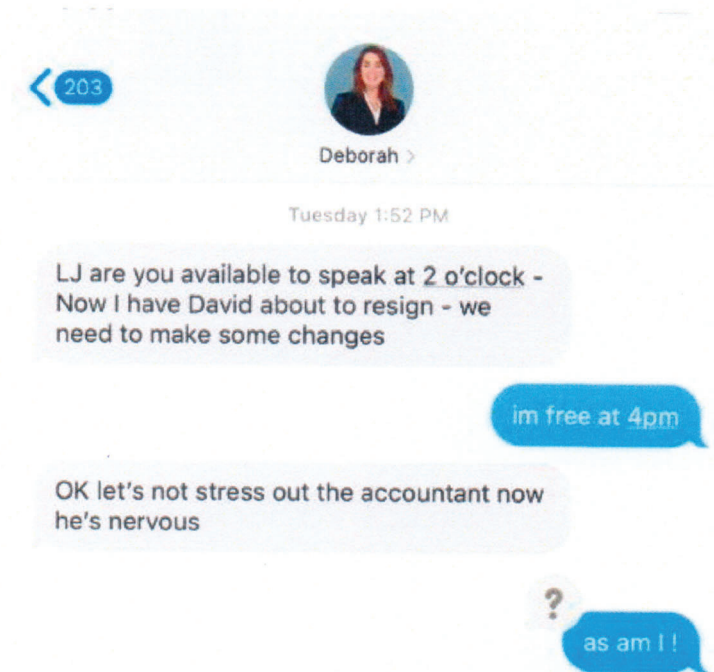
Early Voting for the Republican Primary is from August 8th - 21st at the below locations

Voting Location	Address	City, State, Zip
Acreage Branch Library	15801 Orange Blvd	Loxahatchee, FL 33470
Belle Glade Branch Library	725 NW 4 th Street	Belle Glade, FL 33430
Ezell Hester Community Center	1901 N Seacrest Blvd	Boynton Beach, FL 33435
Florida Atlantic University	777 Glades Road, Rm 109	Boca Raton, FL 33431
Gardens Branch Library	11303 Campus Drive	Palm Beach Gardens, FL 33410
Hagen Ranch Rd. Branch Library	14350 Hagen Ranch Road	Delray Beach, FL 33446
Jupiter Community Center	200 Military Trail	Jupiter, FL 33458
Lantana Branch Library	4020 Lantana Road	Lake Worth, FL 33462
SOE Glades Branch Office	2976 State Rd #15, 2 nd Floor	Belle Glade, FL 33430
South County Civic Center	16700 Jog Road	Delray Beach, FL 33446
Spanish River Branch Library	1501 NW Spanish River Blvd	Boca Raton, FL 33431
Delray Beach Community Center	50 NW 1 st Avenue	Delray Beach, FL 33444
Wellington Branch Library	1951 Royal Fern Drive	Wellington, FL 33414
Wells Rec Community Center	2409 Avenue H West	Riviera Beach, FL 33404
West Boca Branch Library	18685 State Road 7	Boca Raton, FL 33498
WPB City Hall Flagler Gallery	401 Clematis Street	West Palm Beach, FL 33401
Summit Main Library	3650 Summit Blvd	West Palm Beach, FL 33406
Greenacres Community Center	501 Swain Blvd	Greenacres, FL 33463

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PRSRV STD
US POSTAGE
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MIAMI, FL
PERMIT NO. 1894


Appendix 5. Tuesday April 12, 2022 text from Ms. Adeimy indicating her Treasurer is nervous about the compliance issues and is potentially on the verge of resignation because of her.



Appendix 6. Requests made orally to re-record audio going to more than 500 to include disclaimer on or about March 29, 2022

< 203



Deborah >




ill splice out the phone you put cannot use
it want them contacting via the website 1:05 PM

also u dont say this thursday march 31st 1:07 PM

better to just re-record 1:07 PM

 1:25 PM
New Recording 4.m4a

 1:36 PM
New Recording 5.m4a

Sat, Mar 26, 5:37 PM