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FEDERAL ELECTION COMMISSION
MAY 6, 2022 12:03 PM
OFFICE OF GENERAL COUNSEL

Terrance Whitehead
Chicago, IL 60651

April 21, 2022

MUR 7996

Office of General Counsel
Federal Election Commission
1050 First Street, NE
Washington, DC 20463

Electronic copy submitted to EnfComplaint@fec.gov.

To Whom It May Concern:

I am writing with a complaint regarding campaign finance violations by Patricia R Dowell, candidate for Congress in IL-01, and associated committee, Pat Dowell for Congress (C00799650). Below please find the outline of what I believe to be violations of campaign finance law.

Summary

Alderwoman Pat Dowell, a federal candidate for Congress, suspended her race for Secretary of State and announced she would run for Congress on January 5, 2022, but continued to use her nonfederal account to fund routine campaign expenses through March 31, 2022, as reported on her Illinois campaign finance disclosure on April 15, 2022, which appears to violate the law.

Facts

1. Alderwoman Pat Dowell announced her campaign for Illinois Secretary of State on April 7, 2021, and amended her nonfederal committee with the State of Illinois for reporting contributions and expenditures for this race on December 02, 2021.

CHICAGO SUN-TIMES

ELECTIONS NEWS POLITICS

Ald. Pat Dowell jumps into secretary of state's race with plans for licenses, literacy: 'We can do more'

Dowell also listed helping small and minority-owned businesses navigate the state's licensing requirements as a top priority.

By Rachel Winkler | Apr 1, 2021, 7:34am CDT

| | | | |
|--|--|---|---|
|  | FORM D-1 | STATEMENT OF ORGANIZATION (PLEASE PRINT IN BLOCK) | FOR OFFICE USE ONLY RECEIVED OCT 8 1971 U.S. DEPARTMENT OF JUSTICE FEDERAL BUREAU OF INVESTIGATION |
| | Full Name and complete mailing address of Political Organization Citizens for the District 6044 South State Street Chicago, IL 60637-5228 | | <input type="checkbox"/> Have no financial interests |
| <input type="checkbox"/> Organization has received contributions from a bank, stock, or other source | | | MULTIPLE COMPLETES INDICATE PAGE NO. 1172-12 |

2. On January 5, 2022, Dowell announced that she was suspending her campaign for Secretary of State, and launching a campaign for Congress in Illinois' First District. She organized a federal committee for reporting contributions and expenditures in that race on January 6, 2022.

CHICAGO SUN-TIMES

POLITICS NEWS CHICAGO

Ald. Pat Dowell drops secretary of state bid, jumps into House race to replace U.S. Rep. Bobby Rush

While Dowell was a longshot in the secretary of state primary, she starts her congressional race in a strong position, with a political and fundraising campaign operation already in place.

By Lynn Sweet | Jan 5, 2022 5:28pm CDT

FEC FORM 1

STATEMENT OF ORGANIZATION

FILING FEC-1554596

1. Pat Dowell for Congress
 1000 N. Dearborn
 Chicago, IL 60610
 Email: pdowell@patdowell.com

2. Date: 01/04/2022
 3. FEC Committee ID # C00000000 This committee is a Principal Campaign Committee Candidate: Patricia Dowell
 Party: Democratic Party
 Office Sought: House of Representatives
 State & District: IL-05

3. Dowell's nonfederal political committee continued to pay for routine campaigning expenses well into her Congressional campaign, as late as March 31, 2022, the last day which the April 2022 Quarterly report covers, according to her disclosures.

While some of these (i.e. consulting fees) could be reasonably explained as outstanding expenses from her Secretary of State's race, others are inarguably not: food, rent, gas, hall rental, cleaning, vote builder, utilities, printing, postage, Ubers (ride-share service), advertising, salaries, office supplies, and other expenses were all purchased well after she suspended her campaign and launched a federal campaign.

In total, Dowell spent **\$169,024.06** on campaign expenses from her nonfederal account Citizens for Dowell AFTER she announced she was no longer running for a non-federal race and she was running for Congress. They are as follows.

| Payee | Amount | Date | Purpose |
|------------------------|------------|---------|---|
| eF Design Group | \$2,425.00 | 1/5/22 | Printing |
| Matanky Partners XXIX | \$887.00 | 1/6/22 | Rent |
| Quill | \$174.89 | 1/7/22 | Office supplies |
| | | 1/10/22 | |
| Kurth Lampe Worldwide | \$4,000.00 | 2 | Political consulting and media relations services |
| | | 1/11/22 | |
| Erdman, Scott | \$4,500.00 | 2 | Legal fees |
| | | 1/12/22 | |
| amazon.com | \$116.94 | 2 | Office supplies |
| | | 1/12/22 | |
| Target | \$62.41 | 2 | Office supplies |
| | | 1/14/22 | |
| Goshen impact services | \$5,000.00 | 2 | Consulting-political outreach services for SOS race |
| | | 1/14/22 | |
| Charles, Robert | \$4,000.00 | 2 | Retainer_deputy campaign mgr/finance chairman |
| | | 1/18/22 | |
| 1833 Group | \$5,000.00 | 2 | Consulting |
| | | 1/18/22 | |
| Charles, Robert | \$4,000.00 | 2 | Retainer-deputy campaign mgr/Finance chairman |

| | | | | |
|------------------------------|------------|--------|---|---|
| Directv Service | \$230.46 | 1/20/2 | 2 | Utilities |
| Verizon Wireless | \$562.68 | 1/21/2 | 2 | Cell phone |
| Arka Pana Consult5ing | \$6,000.00 | 1/24/2 | 2 | Consulting |
| amazon.com | \$86.61 | 1/26/2 | 2 | Office supplies |
| Facebook | \$10.00 | 1/31/2 | 2 | Advertising |
| Facebook | \$10.00 | 1/31/2 | 2 | Advertising |
| Facebook | \$10.00 | 1/31/2 | 2 | Advertising |
| Facebook | \$15.00 | 1/31/2 | 2 | Advertising |
| Facebook | \$15.00 | 1/31/2 | 2 | Advertising |
| Facebook | \$25.00 | 1/31/2 | 2 | Advertising |
| Facebook | \$35.00 | 1/31/2 | 2 | Advertising |
| Grants Financial Services | \$1,297.00 | 2/1/22 | | Accounting fees |
| Facebook | \$50.00 | 2/1/22 | | Advertising |
| Google G Suite | \$108.00 | 2/2/22 | | Computer - software |
| Equality IL Institute | \$700.00 | 2/3/22 | | Donation |
| Grants Financial Services | \$1,697.00 | 2/7/22 | | Accounting fees |
| Jones, Sharon | \$500.00 | 2/7/22 | | Pastoral outreach service for Jan 2022 |
| Pickett, Hope | \$1,133.33 | 2/8/22 | | Campaign management salary |
| Pickett, Hope | \$8,500.00 | 2/8/22 | | Campaign management salary |
| Kurth Lampe Worldwide | \$8,000.00 | 2/9/22 | | Political consulting & media relations services |
| Dunkin Donuts | \$44.39 | 2/14/2 | 2 | Food |
| matanky realty group | \$2,661.00 | 2/14/2 | 2 | Rent for Nov, Dec, February |
| First Communications | \$228.05 | 2/14/2 | 2 | Telephones |
| Uber | \$32.37 | 2/15/2 | 2 | Transportation |
| Democratic Party of Illinois | \$2,000.00 | 2/16/2 | 2 | Computer - software: vote builder |
| L2 Lounge | \$5,960.78 | 2/16/2 | 2 | Meals |
| eF Design Group | \$1,000.00 | 2/16/2 | 2 | Printing |
| Uber | \$45.08 | 2/16/2 | 2 | Transportation |
| Facebook | \$275.00 | 2/17/2 | 2 | Advertising |

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|---------------------------|------------|--------|---|--|
| Uber | \$21.62 | 2/17/2 | 2 | Transportation |
| Facebook | \$175.00 | 2/18/2 | 2 | Advertising |
| Uber | \$35.10 | 2/18/2 | 2 | Transportation |
| Facebook | \$250.00 | 2/22/2 | 2 | Advertising |
| Ocean Prime | \$530.57 | 2/22/2 | 2 | Food |
| Zeglio | \$4,100.00 | 2/22/2 | 2 | Public relations |
| Uber | \$93.87 | 2/22/2 | 2 | Transportation |
| Arka Pana Consult5ing | \$7,500.00 | 2/23/2 | 2 | Consulting |
| QR Code | \$83.88 | 2/23/2 | 2 | QR barcode generator |
| Gallery Guichard | \$745.20 | 2/24/2 | 2 | Fundraising - hall rental |
| Facebook | \$296.88 | 2/28/2 | 2 | Advertising |
| Odelson, Burt | \$2,500.00 | 2/28/2 | 2 | Campaign attorney fee |
| Arka Pana Consult5ing | \$3,500.00 | 2/28/2 | 2 | Consulting |
| Friends of Jim Gleffe | \$350.00 | 2/28/2 | 2 | Donation |
| Goshen impact services | \$5,000.00 | 2/28/2 | 2 | Political outreach service for SOS race |
| Charles, Robert | \$3,000.00 | 2/28/2 | 2 | Retainer_deputy campaign Manager/finance chairma |
| Hopewell LLC | \$8,500.00 | 3/1/22 | | march 2022 |
| Pickett, Hope | \$8,500.00 | 3/1/22 | | Campaign management salary |
| 1833 group | \$5,046.40 | 3/1/22 | | Campaign Management Salary-March |
| Everywhere Wireless | \$714.15 | 3/1/22 | | Consulting |
| Everywhere Wireless | \$241.89 | 3/1/22 | | Internet access |
| Jones, Sharon | \$500.00 | 3/1/22 | | Internet access |
| Google | \$89.36 | 3/2/22 | | Pastoral outreach Services |
| Google G Suite | \$110.56 | 3/3/22 | | Advertising |
| Grassroots Analytics | \$275.60 | 3/3/22 | | Computer - software |
| Pearl's Place | \$212.40 | 3/3/22 | | Computer - software |
| Uber | \$13.00 | 3/3/22 | | Food |
| NGP Van Inc | \$1,308.00 | 3/3/22 | | Transportation |
| Powell Photography | \$1,035.00 | 3/4/22 | | Computer - software |
| Matanky Realty Group | \$887.00 | 3/4/22 | | Photography |
| Grants Financial Services | \$120.13 | 3/4/22 | | Rent |
| | | 3/7/22 | | Office supplies; checks |

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|---------------------------|------------|--------|---|
| Uber | \$73.23 | 3/7/22 | Transportation |
| NGP Van Inc | \$1,308.00 | 3/8/22 | Computer - software |
| Crowne Plaza Springfield | \$517.90 | 3/8/22 | Hotel |
| Crowne Plaza Springfield | \$17.82 | 3/9/22 | Food |
| | | 3/10/2 | |
| CABC | \$4,000.00 | 2 | Donation - year |
| | | 3/11/2 | Political Consulting & Media Relations Services – |
| Kurth Lampe Worldwide | \$4,000.00 | 2 | March 2022 |
| | | 3/11/2 | |
| Uber | \$13.17 | 2 | Transportation |
| | | 3/14/2 | |
| Cullens Porter | \$269.31 | 2 | Food |
| | | 3/14/2 | |
| amazon.com | \$195.03 | 2 | Office supplies |
| | | 3/14/2 | |
| First Communications | \$74.94 | 2 | Telephones |
| | | 3/14/2 | |
| Uber | \$121.11 | 2 | Transportation |
| | | 3/15/2 | |
| Dunkin Donuts | \$103.81 | 2 | Food |
| | | 3/15/2 | |
| Everywhere Wireless | \$241.89 | 2 | Internet access |
| | | 3/15/2 | |
| Dolly | \$450.00 | 2 | Movers |
| | | 3/15/2 | |
| Uber | \$32.30 | 2 | Transportation |
| | | 3/16/2 | |
| grassroots analytics | \$402.00 | 2 | Computer - software |
| | | 3/16/2 | |
| Uber | \$26.92 | 2 | Transportation |
| | | 3/17/2 | |
| Grants Financial Services | \$1,697.00 | 2 | Accounting fees |
| | | 3/17/2 | |
| Arka Pana Consulting | \$7,500.00 | 2 | Consulting |
| | | 3/17/2 | |
| Uber | \$17.30 | 2 | Transportation |
| | | 3/18/2 | |
| IVI-IPO | \$100.00 | 2 | Donation |
| | | 3/18/2 | |
| Target | \$406.96 | 2 | Office supplies |
| | | 3/18/2 | |
| amazon.com | \$57.41 | 2 | Office supplies |
| | | 3/21/2 | |
| Google | \$350.00 | 2 | Advertising |
| | | 3/21/2 | |
| Verizon Wireless | \$610.09 | 2 | Cell phone |
| | | 3/21/2 | |
| amazon.com | \$103.58 | 2 | Office supplies |
| | | 3/21/2 | |
| FedExOffice | \$237.53 | 2 | Postage |

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|----------------------------|------------|--------|---|-----------------------|
| USPS | \$129.60 | 3/21/2 | 2 | Postage |
| QR Code | \$113.77 | 3/21/2 | 2 | QR Barcode generator |
| Uber | \$36.25 | 3/21/2 | 2 | Transportation |
| Uber | \$23.87 | 3/21/2 | 2 | Transportation |
| Uber | \$188.22 | 3/21/2 | 2 | Transportation |
| Big Shoulders Consulting | \$1,500.00 | 3/22/2 | 2 | Consulting - Research |
| IVI-IPO | \$100.00 | 3/22/2 | 2 | Donation |
| IVI-IPO | \$100.00 | 3/22/2 | 2 | Donation |
| BP Amoco Gas Station | \$818.69 | 3/22/2 | 2 | Gasoline |
| Liberty Mutual Insurance | \$803.50 | 3/22/2 | 2 | Insurance |
| First Communications | \$151.67 | 3/22/2 | 2 | Telephone |
| Uber | \$24.42 | 3/22/2 | 2 | Transportation |
| Facebook | \$400.00 | 3/23/2 | 2 | Advertising |
| USPS | \$250.60 | 3/23/2 | 2 | Postage |
| Uber | \$56.71 | 3/23/2 | 2 | Transportation |
| IVI-IPO | \$150.00 | 3/24/2 | 2 | Donation |
| Planned Parenthood of IL | \$800.00 | 3/25/2 | 2 | Donation |
| Petterinos | \$186.44 | 3/25/2 | 2 | Food |
| Uber | \$70.09 | 3/25/2 | 2 | Transportation |
| Facebook | \$383.55 | 3/28/2 | 2 | Advertising |
| Dyer, Major "Clear" Sandra | \$750.00 | 3/28/2 | 2 | Cleaning |
| Dunkin Donuts | \$17.71 | 3/28/2 | 2 | Food |
| Wal-Mart | \$167.84 | 3/28/2 | 2 | Office supplies |
| USPS | \$17.90 | 3/28/2 | 2 | Postage |
| eF Design Group | \$5,969.10 | 3/28/2 | 2 | Printing |

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|-------------------|--------------------|--------|----------|-----------------|
| Uber | \$147.80 | 3/28/2 | 2 | Transportation |
| Constant Contact | \$212.55 | 3/30/2 | 2 | Advertising |
| Howard, Sean | \$4,000.00 | 3/30/2 | 2 | Consulting |
| Target | \$97.88 | 3/30/2 | 2 | Office supplies |
| Catering by David | \$1,295.00 | 3/31/2 | 2 | Food |
| TOTAL | \$169,024.0 | | 6 | |

4. Dowell's federal political committee's April 2022 Quarterly report shows few or no similar expenses, continuing to reinforce the fact that these expenses were used for her Congressional campaign. For example, there are no reported expenses for postage, transportation, voter file, NGP-VAN, G-suite, rent, printing, utilities, telephones, and office supplies during the same period in which she reports them on the nonfederal report.

Law

According to the Federal Election Commission, a candidate's authorized (federal) committee may not accept funds or assets transferred from a committee established by the same candidate for a nonfederal election campaign. At its option, however, a nonfederal committee of the same candidate may refund its leftover funds to its contributors and may coordinate arrangements with the federal campaign for a solicitation of those same persons. The full cost of this solicitation must be paid by the federal committee.

Further, federal law limits contributions from any given individual to \$2,900 per election, while Illinois law permits contributions from any individual to \$5,000 per Election. Illinois nonfederal committees are also permitted to accept contributions from corporations, whereas federal committees are not, so even if Dowell was able to use nonfederal money, such contributions would be not permissible and violate federal law. [DON'T KNOW WE NEED THIS]

Conclusion

There is reason to believe that Pat Dowell's Congressional campaign has benefitted from expenditures made by the nonfederal committee Citizens for Pat Dowell. Under those circumstances, Dowell appears to have violated campaign law by 1. Accepting "funds and assets" from a nonfederal campaign to a federal campaign and 2. Using nonfederal funds in excess of federal limits and nonqualified donors for a federal race. We request the Commission begin an immediate investigation, and if violation(s) are found, that Dowell be held accountable.

VERIFICATION

I, Terrance Whitehead, being first duly sworn on oath, state that I have read the foregoing FEC Complaint and that the statements therein are true and correct to the best of my knowledge and belief.

Terrance Whitehead
Complainant

Signed and sworn to before me, by TERRY WALKER
this 21st day of March, 2022.

Terry Walker
NOTARY PUBLIC

