

BEFORE THE
FEDERAL ELECTION COMMISSION

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FEDERAL ELECTION COMMISSION
AUGUST 19, 2022 1:02 PM
OFFICE OF GENERAL COUNSEL

End Citizens United
Amanda Bogden
PO Box 66005
Washington, DC 20035

MUR 8055

Complainant,

v.

Adam Laxalt
P.O. Box 751102
Las Vegas, NV 89136,

Laxalt for Senate and Cameron Phillips, Treasurer
P.O. Box 751102
Las Vegas, NV 89136
cameron@incompliance.net, and

Morning in Nevada PAC
P.O. Box 97212
Las Vegas, NV 89193
info@morninginnevadapac.org

Respondents.

COMPLAINT

This complaint is filed under 52 U.S.C. § 30109(a)(1) against Adam Laxalt; Laxalt for Senate and Cameron Phillips, its Treasurer; and Morning in Nevada PAC (collectively, “Respondents”), for violating the Federal Election Campaign Act of 1971, as amended (the “Act”) and Federal Election Commission (the “FEC” or “Commission”) regulations. In short, there is compelling evidence that Laxalt has violated the Act by controlling a soft money organization while a federal candidate, and that Laxalt received, and Morning in Nevada PAC made, excessive, unreported, and potentially prohibited in-kind contributions. We respectfully request that the Commission investigate this matter.

FACTUAL BACKGROUND

Adam Laxalt is the former Attorney General of Nevada. On August 15, 2021, he filed a Statement of Candidacy with the FEC in which he declared his intention to run for Senate and identified Laxalt for Senate as his principal campaign committee.¹ The same day, Laxalt for Senate filed a Statement of Organization with the Commission.²

Before becoming a federal candidate, Laxalt had a long history of involvement with a nonfederal PAC in Nevada, called Morning in Nevada PAC (“MIN”). According to MIN’s website, it was “created in 2015 by friends of then-Nevada Attorney General Adam Paul Laxalt.”³ According to the PAC’s state filings, Laxalt served as the President of the PAC beginning in February 2019.⁴ Laxalt was listed as President on the PAC’s amended registrations filed in February 2020 and January 2021.⁵ Nevada permits PACs to accept funds in unlimited amounts and from most sources (including corporations), and MIN has accepted funds from corporations and in excess of the federal PAC contribution limit.⁶

Since its inception, MIN has held an annual “Basque Fry” fundraising event. In 2021, that event was held on August 14. Laxalt served as President of the PAC on that date. On August 14, 2021, MIN posted a link on Facebook stating: “Morning In Nevada PAC President Adam Laxalt on the left’s cancel culture: ‘I encourage you to stand for truth, people are ready to stand with us, our state is ready fight against this, America is ready to fight against this. Let’s go

¹ See Adam Laxalt, Statement of Candidacy (Aug. 15, 2021), available at <https://docquery.fec.gov/cgi-bin/forms/S2NV00324/1534762/>.

² See Laxalt for Senate, Statement of Organization (Aug. 15, 2021), available at <https://docquery.fec.gov/cgi-bin/forms/C00787135/1534763/>.

³ Morning in Nevada PAC, About, at <https://www.morninginnevadapac.org/about> (last visited Aug. 16, 2022).

⁴ See Exhibit A.

⁵ See Exhibits B, C.

⁶ Morning in Nevada PAC Contributions and Expenses Report (Oct. 13, 2021) at <https://www.nvsos.gov/soscandidateservices/anonymousaccess/ViewCCEReport.aspx?syn=9uDGZiGKNYk1%252bVHCWkgijQ%253d%253d>.

get ‘em.’ #BasqueFry Watch live below!”⁷ The PAC again posted that day the following graphic, along with the statement “President of Morning In Nevada PAC Adam Laxalt is speaking addressing the 6th Annual Basque Fry now! Watch his full remarks live below!”



Laxalt and his allies used the 2021 Basque Fry event to foster support for his 2022 Senate candidacy. At the event, Senator Tom Cotton effectively announced Laxalt’s candidacy by stating:

Adam, I guess he’s not supposed to say that he’s going to be your next United States Senator. There’s some campaign finance rules against it. But what do I care about some stupid rules like that? Adam Laxalt is going to the United States Senate for the Battle Born state in 2022.⁸

Similarly, Florida Governor Ron DeSantis encouraged Laxalt to run for Senate at the event.⁹ And Richard Grenell, former acting director of national intelligence said he expected voters to hear from Laxalt on Tuesday: “We can’t make any announcements here about Adam’s future, but as a close friend of Adam’s, I’m telling you I am pushing him hard, that on Tuesday maybe he’ll make an announcement.”¹⁰

Laxalt remained listed as President of MIN on the PAC’s filings until August 31, 2021, at which point one of Laxalt long-standing advisors, Robert S. Uithoven, was identified as

⁷ Facebook (Aug. 14, 2021), available at <https://www.facebook.com/MorninginNevadaPAC/photos/a.526840620808385/2156282367864194/>.

⁸ Associated Press (Aug. 15, 2021), available at <https://mynews4.com/newsletter-daily/sen-tom-cotton-speaks-at-6th-annual-basque-fry-in-gardnerville>.

⁹ *Id.*

¹⁰ Nevada Independent (Aug. 15, 2021), available at <https://thenevadaindependent.com/article/sen-tom-cotton-announces-adam-laxalts-candidacy-for-u-s-senate>.

President of the PAC.¹¹ Uithoven ran Laxalt's campaign for Attorney General in 2014,¹² and Uithoven continues to advise Laxalt in connection with his Senate campaign.¹³ According to Commission records, Laxalt for Senate has paid Uithoven and his political consulting firm, Axiom Strategies, \$329,504.38 to date.¹⁴

Recipient	Description	Date	Amt
AXIOM STRATEGIES	STRATEGY CONSULTING SERVICES	6/17/22	\$10,000.00
AXIOM STRATEGIES	PRINTING AND PRODUCTION SERVICES	6/8/22	\$5,615.00
AXIOM STRATEGIES	DIGITAL MANAGEMENT SERVICES	6/7/22	\$126,771.00
AXIOM STRATEGIES	STRATEGY CONSULTING SERVICES	5/20/22	\$10,000.00
AXIOM STRATEGIES	STRATEGY CONSULTING SERVICES	5/6/22	\$10,000.00
AXIOM STRATEGIES	TRAVEL/ NO ITEMIZATION REQUIRED	4/29/22	\$325.49
AXIOM STRATEGIES	SEE BELOW/ TRAVEL	4/8/22	\$364.76
AXIOM STRATEGIES	PRINTING AND PRODUCTION SERVICES	4/8/22	\$88,447.00
AXIOM STRATEGIES	SEE BELOW/ TRAVEL	4/8/22	\$473.99
AXIOM STRATEGIES	STRATEGY CONSULTING SERVICES	3/11/22	\$10,000.00
AXIOM STRATEGIES	STRATEGY CONSULTING SERVICES	3/4/22	\$10,000.00
AXIOM STRATEGIES	SEE BELOW/ TRAVEL	2/12/22	\$339.09
AXIOM STRATEGIES	STRATEGY CONSULTING SERVICES	12/10/21	\$10,000.00
AXIOM STRATEGIES	SEE BELOW/ TRAVEL	12/3/21	\$16.54
AXIOM STRATEGIES	STRATEGY CONSULTING SERVICES	12/3/21	\$40,000.00
UITHOVEN, ROBERT	SEE BELOW/ TRAVEL, CATERING SERVICES	10/29/21	\$7,151.51

Laxalt has remained closely tied to MIN. To this day, MIN still prominently features biographical information about Laxalt on its website.¹⁵ And just this past week, Laxalt used the PAC's annual Basque Fry to again advance his campaign for U.S. Senate. At the event, Laxalt

¹¹ Morning in Nevada PAC Committee Registration Form at <https://www.nvsos.gov/elections/2488.pdf> (last visited Aug. 16, 2022).

¹² See <https://robertuithoven.com/> (last visited Aug. 16, 2022).

¹³ See Associated Press (Aug. 16, 2021), available at <https://www.rgj.com/story/news/politics/2021/08/16/republican-adam-laxalt-us-senate-candidate-nevada/8152974002/> (identifying Uithoven as Laxalt's "political consultant"); CNN (Dec. 7, 2021), available at <https://www.cnn.com/2021/12/07/politics/nevada-senate-race-2022-republican-hopes/index.html> (identifying Uithoven as "a Laxalt adviser").

¹⁴ https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00787135&recipient_name=axiom&recipient_name=uithoven

¹⁵ Morning in Nevada PAC, About, at <https://www.morninginnevadapac.org/about> (last visited Aug. 16, 2022).

gave a stump speech for his election, stating “So this is what we can get out of our leaders. This is what we could get if we fight in this state to get me in the United States Senate. Right?”

Laxalt later stated “We have the record. We have the policies. We have the ideas. If you elect me, I'm going to be able to join Senator Cruz and others. And we're going to be the 51st vote to start reversing this madness.”¹⁶

LEGAL ANALYSIS

I. Laxalt triggered federal candidacy on August 14, 2022.

Under the Act, an individual will become a federal candidate when they raise or spend more than \$5,000 in connection with a candidacy for federal office.¹⁷ While Commission rules provide for a “testing-the-waters” exemption, that exemption does not apply where a candidate has decided to become a candidate for federal office, such as where a candidate “makes or authorizes written or oral statement that refer to him or her as a candidate for a particular office.”¹⁸

Here, Laxalt received an in-kind contribution from MIN by using the 2021 Basque Fry to announce his federal candidacy. When a third party pays for the cost of an event where a candidate or his agents is permitted to expressly advocate the candidate’s election, it results in an in-kind contribution to that candidate.¹⁹ The Basque Fry is MIN’s marquee annual fundraising event and, on information and belief, the costs associated with it would have easily exceeded \$5,000. The Basque Fry is hosted at the Corley Ranch and MIN spent \$18,991 on Corley

¹⁶ A true and correct transcript of Laxalt’s speech is attached to Complaint as Exhibit D. A video of the speech is available from C-SPAN at <https://www.c-span.org/video/?521979-5/us-senate-candidate-adam-laxalt-r-nv-speaks-2022-basque-fry-nevada>.

¹⁷ 52 U.S.C. § 30101(2)

¹⁸ 11 C.F.R. §§ 100.72(b), 100.131(b).

¹⁹ See, e.g., Advisory Opinion 1996-11.

Ranches LLC, MIN spent \$144,185.64 on food and wine purchases, and \$50,315.91 on party rentals, all within a month of the date of the 2021 Basque Fry among other expenses likely related to hosting the event.²⁰

Moreover, the facts indicate that Laxalt – who was President of MIN on the date in question – discussed with the event’s attendees that he would soon be announcing his federal candidacy. This fact is revealed by the remarks of the various speakers at the event. Senator Cotton announced that Laxalt would be “your next United States Senator,” while admitting that the “stupid” campaign finance rules prohibited him from saying as much. And Richard Grenell indicated that an announcement could be expected from Laxalt on the following Tuesday. This indicates that there were discussions between the incipient Laxalt campaign and other event speakers about Laxalt’s impending announcement of his candidacy. And, as the Commission has advised, a statement that a person “will announce candidacy” on a date certain is itself a statement that triggers candidacy.²¹

In short, then, the facts indicate that Laxalt had announced his impending candidacy to his allies at or before the 2021 Basque Fry, and he received more than \$5,000 in in-kind support for his candidacy from MIN. Thus, he triggered candidacy no later than August 14, 2021.

II. Laxalt controlled an organization that spent soft money in connection with federal and nonfederal elections.

The Act, as amended by the Bipartisan Campaign Reform Act of 2002, prohibits federal candidates, and any organization that is “directly or indirectly” established, maintained, financed or controlled by a federal candidate, from raising or spending funds in connection with an

²⁰ Morning in Nevada PAC Contributions and Expenses Report (Oct. 13, 2021) at <https://www.nvsos.gov/soscandidateservices/anonymoussaccess/ViewCCEReport.aspx?syn=9uDGZiGKNYk1%252bVHCWkgijQ%253d%253d>.

²¹ Advisory Opinion 2015-09, at 6.

election that fall outside of the federal source restrictions and contribution limits.²² In the case of spending in connection with a federal election, that spending must also be subject to federal reporting requirements.²³

Laxalt and MIN have violated this prohibition. He was publicly identified as the President – a position unequivocally denoting control – of MIN as late as August 14, 2021, the day before he formally declared as a federal candidate. And he continued to be listed as President of the PAC on its state registration as late as August 31, 2021. During this period, MIN, with Laxalt as its chief executive officer, solicited nonfederal funds and spent nonfederal funds – funds that were raised outside of the federal contribution limits and source restrictions, and that were not reported to the Commission -- in connection with federal elections, specifically, by using the Basque Fry event to advance Laxalt’s federal candidacy.

Even if the Commission determines that Laxalt did not trigger candidacy until August 15, and that he formally cut ties with MIN after the August 14 Basque Fry but before he declared his candidacy on August 15, there is still ample evidence that Laxalt indirectly controlled MIN after that date. The Commission determines whether a candidate directly or indirectly controls an entity based on a variety of factors, including whether the candidate “directly or through its agent” has the authority or ability to direct or participate in the governance of the entity”; whether the candidate “has common or overlapping officers or employees with the entity”; and whether the candidate “has any members, officers, or employees who were members, officers or employees of the entity that indicates a formal or ongoing relationship.”²⁴ Here, after Laxalt left his position as President of MIN, Robert Uithoven, his long-time adviser, took over that role.

²² 52 U.S.C. § 30125(e)(1).

²³ *Id.* § 30125(e)(1)(A).

²⁴ 11 C.F.R. § 300.2(c)(2).

And, while President of MIN, Uithoven has continued to work as a key advisor to Laxalt's Senate campaign, receiving over \$300,000 in fees for that work to date. Thus, Laxalt may have continued to control MIN through his relationship with Uithoven even after he stepped down as President of MIN.

III. Laxalt received excessive, unreported, and possibly prohibited in-kind contributions from MIN.

Federal law prohibits candidates from accepting contributions from persons other than multicandidate committees of more than \$2,900 per election.²⁵ Federal candidates must also itemize all contributions that aggregate in excess of \$200 per source per election cycle.²⁶ Lastly, when unregistered organizations donate to a federal candidate, the organization must either donate from an account that contains only federally permissible funds or must demonstrate through a reasonable accounting that the contribution being made to the federal candidate consist of federally permissible funds.²⁷

Here, there is ample evidence that MIN made, and Laxalt received, multiple excessive and unreported contributions. First, Laxalt received an excessive in-kind contribution in August 2021 when he, then the President of MIN, used MIN's annual Basque Fry to develop support for this federal candidacy; as discussed above, the cost of the event was more than \$2,900, the contribution limit then in effect, and this in-kind support was not reported by Laxalt for Senate on its FEC filings.²⁸ This may have also resulted in an improper corporate contribution, unless

²⁵ 52 U.S.C. §30116.

²⁶ *Id.* § 30104(b)(3).

²⁷ 11 C.F.R. § 102.5(b).

²⁸ Even if Laxalt did not trigger candidacy until August 15, the same result must follow. Under the testing-the-waters exemption, an individual who is exploring a federal candidacy may only use funds that are subject to the federal limits and source restrictions in connection with those exploratory activities, and must report contributions received once that individual becomes a federal candidate. *Id.* § 100.72(a). Thus, even if the Commission concludes that Laxalt was still in the exploratory phase as of August 14, 2022, he violated the Act and Commission regulations by accepting an excessive contribution in connection with his exploratory activities and by failing to report that support once he triggered candidacy.

MIN used a reasonable accounting mechanism to identify sufficient federal funds on-hand to account for the contribution.

Second, Laxalt received an excessive in-kind contribution from MIN again in August 2022, when he gave a campaign stump speech at the 2022 Basque Fry. As stated above, the Commission has long held that, when a third party pays for the cost of an event where a candidate is permitted to expressly advocate his own election, it results in an in-kind contribution to that candidate.²⁹ That is precisely what happened here. The cost of the event was again, on information and belief, more than the \$2,900 contribution limit and Laxalt, for his part, failed to disclose any contribution from MIN. Accordingly, Laxalt again received an excessive unreported contribution from MIN.

REQUESTED ACTION

As shown, Respondents appear to have repeatedly violated the Act and Commission regulations by raising and spending soft money in connection with a federal election and making and accepting excessive and undisclosed contributions. Accordingly, we respectfully request that the Commission immediately investigate these violations, fine Respondents the maximum amount permitted by law, and enjoin Respondents from further violations of the law.

Sincerely,



End Citizens United
Amanda Bogden
PO Box 66005
Washington, DC 20035

²⁹ See, e.g., Advisory Opinion 1996-11.

SUBSCRIBED AND SWORN to before me this the 19th day of August 2022.

Mark Andrews

Notary Public

My Commission Expires:

MARK ANDREWS
NOTARY PUBLIC DISTRICT OF COLUMBIA
My Commission Expires July 14, 2024



MUR 8055**RECEIVED**

FEDERAL ELECTION COMMISSION

NOVEMBER 29, 2022 11:28 AM

EXHIBIT A**OFFICE OF GENERAL COUNSEL**

BARBARA K. CEGAVSKE
 Secretary of State
 101 North Carson Street, Suite 3
 Carson City, Nevada 89701
 (775) 684-5705
 Facsimile: (775) 684-5718
 Email: nvelect@sos.nv.gov
 Website: www.nvsos.gov

State of Nevada
Committee Registration Form

Use this form to register or make changes to a:

- Committee for Political Action (PAC)
- Committee for Political Action (PAC) Advocating Passage or Defeat of a Ballot Question
- Committee Sponsored by a Political Party
- Recall Committee

Select Committee Type			
<input checked="" type="checkbox"/> Committee for Political Action (PAC)	<input type="checkbox"/> Committee Sponsored by a Political Party	<input type="checkbox"/> Recall Committee	
<input type="checkbox"/> Committee for Political Action (PAC) Advocating Passage			
Action Requested (select all that apply)			
<input type="checkbox"/> New Registration	<input type="checkbox"/> PAC Annual Registration (Due on or before January 15 th of each year – <u>NRS 294A.230(4)(b)</u>)		
<input type="checkbox"/> Amended Registration (check all that apply):			
<input checked="" type="checkbox"/> Change Officers	<input type="checkbox"/> Change Registered Agent	<input type="checkbox"/> Change Address	<input type="checkbox"/> Reactivation
<input type="checkbox"/> Change Name (previous name of Committee)			
<input type="checkbox"/> Other			
Name of Committee Morning in Nevada PAC			
Mailing Address PO Box 97212		City Las Vegas	State NV
Email Address info@morninginnevadapac.org		Telephone Number (702) 798-5156	
PURPOSE: Briefly state the purpose for which the Committee was organized. The Corporation is established primarily to influence the selection, nomination, election appointment or defeat of candidates in state or local public office by conducting independent expenditure campaigns that advance common sense policy solutions.			
Name of Public Officer to be Recalled (include title of office held) *This section only applies to a Recall Committee*			
REGISTERED AGENT: Pursuant to NRS 294A.240, each PAC must appoint and keep in the State a registered agent, as provided in NRS 14.020, who must be a natural person who resides in the State of Nevada. *Recall Committees only need a Registered Agent if it is an organization located outside the State.*			
Name of Registered Agent Katrina Bruce		Email Address katrina@amnevada.com	Telephone Number (702) 798-5156
Physical Address 1880 E Warm Springs Rd 3100		City Las Vegas	State NV
		ZIP Code 89119	
REGISTERED AGENT ACCEPTANCE: I hereby accept appointment as Registered Agent for the above-named Committee.			
Signature of Registered Agent 		For Office Use Only	
Date 2/20/19		Office of the Secretary of State Barbara Cegavske Elections Division	
		KRhynes 2/27/19 #2488	

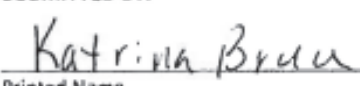
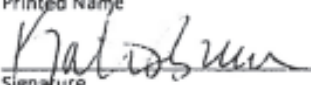
OFFICERS: List the name, title, address and telephone number of each officer (attach additional pages, if necessary).			
Officer Name and Title Adam Paul Laxalt, President		Telephone Number (702) 798-5156	
Mailing Address PO Box 97212	City Las Vegas	State NV	ZIP Code 89193
Officer Name and Title Jeffre F. Barr, Secretary and Treasurer		Telephone Number (702) 798-5156	
Mailing Address PO Box 97212	City Las Vegas	State NV	ZIP Code 89193
Officer Name and Title Paul J. Enos, Director		Telephone Number (702) 798-5156	
Mailing Address PO Box 97212	City Las Vegas	State NV	ZIP Code 89193
Officer Name and Title Michael McClellan, Director		Telephone Number (702) 798-5156	
Mailing Address PO Box 97212	City Las Vegas	State NV	ZIP Code 89193
AFFILIATIONS: If the PAC is affiliated with any other organizations, list the name, address and telephone number of each organization (attach additional pages, if necessary). <i>*Political Party Committees and Recall Committees may skip this section.*</i>			
Name of Organization		Telephone Number	
Mailing Address	City	State	ZIP Code
Name of Organization		Telephone Number	
Mailing Address	City	State	ZIP Code
SUBMITTED BY: <div style="display: flex; justify-content: space-between;"> <div>  Printed Name  Signature </div> <div> <div style="text-align: right;">702 798-5154</div> Telephone Number <div style="text-align: right;">2/20/19</div> Date </div> </div>			

EXHIBIT B



BARBARA K. CEGAUSKE
Secretary of State
101 North Carson Street, Suite 3
Carson City, Nevada 89701
(775) 684-5705
Email: nvelect@sos.nv.gov
Website: www.nvsos.gov

State of Nevada Committee Registration Form

Use this form to register or make changes to a:

- Committee for Political Action (PAC)
- Committee for Political Action (PAC) Advocating Passage or Defeat of a Ballot Question
- Committee Sponsored by a Political Party
- Recall Committee

Select Committee Type			
<input checked="" type="checkbox"/> Committee for Political Action (PAC)	<input type="checkbox"/> Committee Sponsored by a Political Party		<input type="checkbox"/> Recall Committee
<input type="checkbox"/> Committee for Political Action (PAC) Advocating Passage or Defeat of a Ballot Question			
Action Requested (select all that apply)			
<input type="checkbox"/> New Registration	<input checked="" type="checkbox"/> PAC Annual Registration (Due on or before January 15th of each year - NRS 294A.230(4)(b))		
<input type="checkbox"/> Amended Registration (check all that apply):			
<input type="checkbox"/> Change Officers	<input type="checkbox"/> Change Registered Agent	<input type="checkbox"/> Change Address	<input type="checkbox"/> Notice of Inactivity (NAC 294A.250) <input type="checkbox"/> Reactivation
<input type="checkbox"/> Change Name (previous name of Committee)			
<input type="checkbox"/> Other			
Name of Committee Morning in Nevada PAC			
Mailing Address PO Box 97212		City Las Vegas	State NV
			ZIP Code 89193
Email Address info@morninginnevadapac.org		Telephone Number (702) 361-7940	
PURPOSE: Briefly state the purpose for which the Committee was organized. The Corporation is established primarily to influence the selection, nomination, election appointment or defeat of candidates in state or local public office by conducting independent expenditure campaigns that advance common sense policy solutions.			
Name of Public Officer to be Recalled (Include title of office held) *This section only applies to a Recall Committee*			
REGISTERED AGENT: Pursuant NRS 294A.240, each PAC must appoint and keep in the State a registered agent, as provided in NRS 14.020, who must be a natural person who resides in the State of Nevada. *Recall Committees only need a Registered Agent if it is an organization located outside the State.*			
Name of Registered Agent Katrina Bruce		Telephone Number (702) 361-7940	
Physical Address 1880 E Warm Springs Rd #100		City Las Vegas	State NV
			ZIP Code 89119
REGISTERED AGENT ACCEPTANCE: I hereby accept appointment as Registered Agent for the above-named Committee.			
x Signature of Registered Agent Date 02/06/2020		For Office Use Only Office of the Secretary of State Barbara Cegauske Elections Division KRhynes 2/6/20 #2488	


OFFICERS: List the name, title, address and telephone number of each officer (attach additional pages, if necessary).			
Officer Name and Title		Telephone Number	
Adam Paul Laxalt, President		(702) 361-7940	
Mailing Address	City	State	ZIP Code
PO Box 97212	Las Vegas	NV	89193
Officer Name and Title		Telephone Number	
Jeffrey F. Barr, Secretary and Treasurer		(702) 361-7940	
Mailing Address	City	State	ZIP Code
PO Box 97212	Las Vegas	NV	89193
Officer Name and Title		Telephone Number	
Mailing Address	City	State	ZIP Code
Officer Name and Title		Telephone Number	
Mailing Address	City	State	ZIP Code
AFFILIATIONS: If the PAC is affiliated with any other organizations, list the name, address and telephone number of each organization (attach additional pages, if necessary). <i>*Political Party Committees and Recall Committees may skip this section.*</i>			
Name of Organization		Telephone Number	
Mailing Address	City	State	ZIP Code
Name of Organization		Telephone Number	
Mailing Address	City	State	ZIP Code
SUBMITTED BY			
Katrina Bruce		(702) 361-7940	
Printed Name		Telephone	
		02/06/2020	
Signature		Date	

EXHIBIT C



BARBARA K. CEGAVSKE
 Secretary of State
 101 North Carson Street, Suite 3
 Carson City, Nevada 89701
 (775) 684-5705
 Facsimile: (775) 684-5718
 Email: nvelect@sos.nv.gov
 Website: www.nvsos.gov

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Select Committee Type			
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<input type="checkbox"/> Committee for Political Action (PAC) Advocating Passage		<input type="checkbox"/> Recall Committee	
Action Requested (select all that apply)			
<input type="checkbox"/> New Registration		<input checked="" type="checkbox"/> PAC Annual Registration (Due on or before January 15 th of each year – <u>NRS 294A.230(4)(b)</u>)	
<input type="checkbox"/> Amended Registration (check all that apply):			
<input type="checkbox"/> Change Officers	<input type="checkbox"/> Change Registered Agent	<input type="checkbox"/> Change Address	<input type="checkbox"/> Reactivation
<input type="checkbox"/> Change Name (previous name of Committee)			
<input type="checkbox"/> Other			
Name of Committee Morning in Nevada PAC			
Mailing Address PO Box 97212		City Las Vegas	State NV
Email Address info@morninginnevadapac.org		ZIP Code 89193	
Telephone Number (702) 361-7940			
PURPOSE: Briefly state the purpose for which the Committee was organized.			
Name of Public Officer to be Recalled (Include title of office held) *This section only applies to a Recall Committee*			
REGISTERED AGENT: Pursuant to NRS 294A.240, each PAC must appoint and keep in the State a registered agent, as provided in NRS 14.020, who must be a natural person who resides in the State of Nevada. *Recall Committees only need a Registered Agent if it is an organization located outside the State.*			
Name of Registered Agent Katrina Bruce		Email Address katrina@amnevada.com	
Physical Address 1880 E Warm Springs Rd Ste 100		Telephone Number (702) 361-7940	
City Las Vegas		State NV	ZIP Code 89119
REGISTERED AGENT ACCEPTANCE: I hereby accept appointment as Registered Agent for the above-named Committee.			
Katrina Bruce <small>Digitally signed by Katrina Bruce DN: cn=Katrina Bruce, o=AMNEVADA, email=katrina@amnevada.com, c=US Date: 2021.01.15 12:44:39 -0800</small>		For Office Use Only	
		<div style="display: flex; justify-content: space-between;"> <div style="text-align: center;"> Office of the Secretary of State Barbara K. Cegavske Elections Division </div> <div style="border: 1px solid black; padding: 5px; text-align: center;"> KRhynes 1/15/21 #2488 </div> </div>	
Signature of Registered Agent 01/15/2021			
Date			

OFFICERS: List the name, title, address and telephone number of each officer (attach additional pages, if necessary).			
Officer Name and Title Adam Paul Laxalt, President		Telephone Number (702) 361-7940	
Mailing Address PO Box 97212	City Las Vegas	State NV	ZIP Code 89193
Officer Name and Title Jeffrey F. Barr, Secretary and Treasurer		Telephone Number (702) 361-7940	
Mailing Address PO Box 97212	City Las Vegas	State NV	ZIP Code 89193
Officer Name and Title		Telephone Number	
Mailing Address	City	State	ZIP Code
Officer Name and Title		Telephone Number	
Mailing Address	City	State	ZIP Code
AFFILIATIONS: If the PAC is affiliated with any other organizations, list the name, address and telephone number of each organization (attach additional pages, if necessary).			
Political Party Committees and Recall Committees may skip this section.			
Name of Organization		Telephone Number	
Mailing Address	City	State	ZIP Code
Name of Organization		Telephone Number	
Mailing Address	City	State	ZIP Code
SUBMITTED BY:			
Katrina Bruce		(702) 361-7940	
Printed Name		Telephone Number	
Katrina Bruce		01/15/2021	
Signature		Date	

EXHIBIT D

[00:19] **LAXALT:** Thank you. Special thanks to my wife Jaime and my wonderful kids. Thank you guys so much for putting up with this campaign. God bless. That's a tough duty, 4 kids and a new born in a giant US Senate campaign. So if you're the praying type, please pray for my wife Jaime.

[00:55] **LAXALT:** So it's hard to believe it's been a year since the last Basque Fry. That I stood up in front of many thousand Nevadans, and we talked about what was going on in America, in August of 2021. In August of 2021, we saw the left in its fastest advance we've ever seen in any of our lifetimes. We saw how powerful they had become. They've taken over, of course, the media, they've taken over big tech, they've taken over our ruling elites in Washington, they've taken over, of course, Hollywood, and every single day, we could feel how quickly they were taking our country and taking our culture.

[01:44] **LAXALT:** And I wish I could report to you today and then a year later, that they slowed down. Unfortunately, what they've done in the last year is absolutely shocking. We're experienced in our country, all time high inflation, and in this state 15% inflation, the likes of which we've never seen before. We experienced over \$6 gas in this state.

[02:15] **LAXALT:** \$6 gas that of course, you know, the Biden administration and Senator Masto wanted to blame on Putin. And then when that didn't work, then they move to greedy oil executives, and who have they moved to now?

[02:33] **CROWD:** You

[02:33] **LAXALT:** Private citizen Laxalt is somehow responsible for high gas prices in the state of Nevada. These people will say whatever it takes to win and hold power. What else have we gone through in the last 12 months? Well, we have surging crime, still our major cities across America. And while the defund people have kind of quieted down because they know it won't help their election. These left wing policies of no bail, of prosecuting less crimes, of being pro criminal, rather than pro victim. They're taking a toll in communities all across America.

[03:18] **LAXALT:** There have been 2 million people to come across the US border since last August of 2021. We have never seen a border crisis like this. And I'll challenge the media again today, as I often do. Is any media outlet in this state going to cover the effects of the border crisis in this state other than Fox News?

[03:47] **LAXALT:** We have people dying in this state every single day from fentanyl overdoses, people that are being trafficked, sold by the cartels. You know, I challenged the media the other day, it was down in Vegas, and I said there's almost no stories being written about fentanyl overdose deaths. And one of the media outlets had the audacity to respond with the one story that's been written in the last 18 months. I just had to laugh. Exactly. Was that only worth one story of all the toll that's taken on our country and in our state?

[04:29] **LAXALT:** How about Afghanistan? The biggest foreign policy disaster, in at least the generation, if not in our nation's history. Those of us that served in Iraq and have brothers and sisters that served in Afghanistan, for it to all end that way. Was the biggest, most shocking example of leadership failure we've seen in a long time.

[04:57] **LAXALT:** At least when I was in the military. If a ship captain ran a ship aground, guess what happened to that ship Captain. Relieved of command. Even if some E2 that was 19 years old screwed up, guess what, that captain was gone. Has a single person been held accountable for the disastrous Afghanistan withdrawal? General Milley, General Austin, they're still up there. They still think they're doing a swimming job. And so, issue after issue is going the wrong direction. And we could feel it right here, right?

[05:43] **LAXALT:** Our federal law enforcement, the FBI in particular. I'm gonna get to what happened this week. But did we forget about the chapter of labeling our parents domestic terrorists? This is October. October heading into the last election cycle. Parents had the audacity in this state and across the country, to stand up to lockdowns in schools that we never should have had. Not for one day.

[06:18] **LAXALT:** And what were they treated to? The FBI is going to investigate you and maybe put you behind bars for standing up for your children. For fighting against COVID lockdowns. Sisolak didn't get rid of all the mandates until the spring of this year. Just shocking, right. But this is why we have to put everything we can into saving our state and our country.

[06:50] **LAXALT:** This is our year. And we have some examples to look at. We heard Kristi Noem earlier, she's been a beacon of freedom in her state.

[06:59] [CROWD CLAPS]

[07:02] **LAXALT:** We have my dear friend Ron DeSantis, in the state of Florida. He's 43 years old. Three kids. Used to joke, we were the exact same age exact same kids, but I'm beating him at least one thing right now I got four kids. He single handedly defied our failed elites. Dr. Fauci was making it up. We know that. They literally have now admitted that the six foot distance thing, they just picked the number.

[07:42] **LAXALT:** How stupid were we to have to follow along with that? Well, as we know, up here, a lot of people just kind of ignored it. But nonetheless, we had to live under COVID For two years, COVID mandates. And so all this stuff has continued to get worse. And we can't forget that. We've got to make sure that's burning in our in the pits of our stomach, as we decide what we're going to do. And we need to look to the future of what leadership can look like, what our state could look like if we have leaders like Ron DeSantis, that are willing to fight against Disney, right?

[08:21] **LAXALT:** To protect our children in schools. This stuff takes courage. You're gonna be attacked, but he was willing to do it. You know, we're gonna have Senator Ted Cruz come up here in a little bit. Has anyone been a more consistent champion of fighting against the left every single day for the US Senate?

[08:43] [CROWD CHEERS]

[08:46] **LAXALT:** So this is what we can get out of our leaders. This is what we could get if we fight in this state to get me in the United States Senate. Right?

[08:56] [CROWD CHEERS]

[08:59] **LAXALT:** And so, this race is the 51st seat. That is not a stretch. It's not an exaggeration. The entire US Senate will hinge on this race. Senator Masto is considered the most vulnerable Senator in America. And why is she the most vulnerable senator? Well, first and foremost, after eight years of being Attorney General, I had to get in an office and clean up after her once right. And after 13 years, she had nothing to show for Nevada.

[09:36] **LAXALT:** And in all the fights we've needed her in just the last 12 months. Did you hear her calling General Milley or Austin to resign? Did she call for accountability for the Afghanistan disaster? Has she called on people to stop going after our children, to stop weaponizing the FBI? Not a chance. In fact just this Sunday she had a chance to stand with Nevada.

[10:09] **LAXALT:** She had a chance to break from this disastrous bill. 700 billion more dollars. More taxes on all of you. 87,000 IRS agents, that are going to be hired to rifle through everybody's personal returns. 87,000. That's Douglas County, Lyon County, Storey County, all your neighbors, everyone in your community, all IRS agents.

[10:45] **LAXALT:** Think of how many people that is. She had a chance to stand. But what did she prove on Sunday? No matter what she does with the media, no matter how many fancy commercials she puts up, she's a rubber stamp for Joe Biden, and a rubber stamp for the left.

[11:04] **LAXALT:** She has voted with the financial package of Joe Biden 100% of the time. We have inflation because of her vote. We have all time high gas prices because of her voting record. We have an open border because she has refused to stand against the left and this crazy open border policy. And so let me just tell you, folks, we have a generational opportunity to save our state.

[11:36] **LAXALT:** And now's go time. You see the commercials. You see all the literally 10's of millions of dollars, the left is pouring into this state to buy this seat for Catherine Cortez Masto. Are we gonna let them buy this seat?

[11:54] **CROWD:** NO!

[11:56] **LAXALT:** We have the record. We have the policies. We have the ideas. If you elect me, I'm going to be able to join Senator Cruz and others. And we're going to be the 51st vote to start reversing this madness. We're gonna push to secure the border. We're gonna stop spending money. We need to defund the 87,000 IRS agent, right?

[12:24] [CROWD CHEERS]

[12:28] **LAXALT:** We need accountability. We need hearings. We need to hold these Generals before us and find out what really happened and people need to be held accountable. The Secretary of Homeland Security we need to impeach this guy. His one job is to protect the homeland. Guess what, if you have an open border and terrorists are coming in, you can't keep our homeland secure. So this is what's on the line, a chance for us to go on offense.

[12:59] **LAXALT:** Of course, we need the Presidency back in 2024 to truly take our country back, right?

[13:05] [CROWD CHEERS]

[13:07] **LAXALT:** But I believe fundamentally in this state. I believe fundamentally that we are a right of center state. And we are ready to save Nevada. And this is our time. And so I won't repeat what everybody said. But whatever you've done to help in politics in the past, do more. We need you now more than ever, don't take anything for granted. And we can beat all the commercials with live Nevadans speaking to fellow Nevadans, right?

[13:38] **LAXALT:** So I want to thank you all so much for always joining us out here at this incredible event. And I just want to say this is going to be our year. We're going to experience a red wave. You need to keep the faith. We got to drive every single day. We only have 80 days left to save our state. And I'm gonna count on you all to save Nevada and save America. Thank you. God bless.

[14:03] [CROWD CHEERS]

[14:08] **LAXALT:** Thank you. Let's get it done.