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FEDERAL ELECTION COMMISSION

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OFFICE OF GENERAL COUNSEL

September 13, 2022

MUR 8064

COMPLAINANT

Heather C. Kaiser

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USA

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ATTN: Federal Elections Commission

RESPONDANTS: The Clark County Panel to Protect Democracy, The shareholders, board members, and/or trustees, officers, employees, and registered agent(s) of The Clark County Panel to Protect Democracy.

ALLEGATIONS: Failure to register as a PAC with FEC and perform subsequent filings; Failure to disclose independent expenditures(s).

FACT #1 – The Clark County Panel to Protect Democracy is not registered with the FEC. *I attempted to find a registration for the organization by searching the FEC database, but was unable to find it.*

FACT #2: - The Clark County Panel to Protect Democracy is currently running a political website at www.joekentlies.info. *The website only features content which attacks Joe Kent's candidacy, platform, and character.*

FACT #3 – There is no entity named "The Clark County Panel to Protect Democracy" registered with the Washington Secretary of State. *I attempted to find a registration for the organization under the Washington Secretary of State website and was unable to find any organization or entity with this name.*

FACT #4 – The entity known as The Clark County Panel to Protect Democracy is engaging in federal election related advocacy. *An Instagram user posted the website underneath multiple posts on Joe Kent's congressional candidate Instagram page and the content on the page advocates strongly against Joe Kent's congressional candidacy.*

FACT #5 – The entity known as The Clark County Panel to Protect Democracy advocates against Congressional Candidate Joe Kent, therefore making independent expenditures (i.e. purchasing web hosting, website content). *The entity Clark County Panel to Protect Democracy maintains a website attacking Joe Kent by name and candidacy and features an edited/falsified photo of him making obscene gestures.*

FACT #5 – The entity known as The Clark County Panel to Protect Democracy failed to report independent expenditures against Joe Kent. *Since the entity known as The Clark County Panel to Protect Democracy did not register with the FEC, it can be concluded that the entity has not reported any independent expenditures.*

CAVEATS: The unknowns are as follows:

1. Who directs or controls this unregistered PAC?
2. Who has contributed to the PAC?
3. How much money does the PAC raise/spend?

I swear under penalty of perjury that the preceding information is true to the best of my knowledge and ability.

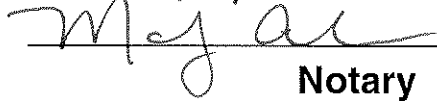


Heather C. Kaiser

Signed: September 13, 2022

State of Washington
Clark County

Date 9/13/2022



Notary

My Commission Expires: 5/2/2026

