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By OGC/CELA at 5:22 pm, Sep 19, 2023

**Roger W. Knight, P. A.**  
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Raleigh, North Carolina 27615  
Phone 919.518.8040  
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September 19, 2023

Mr. Roy Q. Lockett  
Acting Assistant General Counsel  
Complaints, Examination and Legal Administration  
Federal Election Commission  
1050 First Street, NE  
Washington, DC. 20463  
Attn: Kathryn Ross

Via email: [cela@fec.gov](mailto:cela@fec.gov)

RE: Education First Alliance, Deirdre Morrison in her capacity as Treasurer,  
FEC ID# C00806554  
Supplemental Response to Complaint MUR 8114

Dear Mr. Lockett and Ms. Ross,

My firm represents Education First Alliance (hereinafter “EFA”), registered with the Commission as a Political Action Committee (“PAC”), and assigned the above FEC ID number. I am writing to inform the Commission that, upon a review, it is apparent to me that EFA should never have registered with the Commission, did not intend to operate as a PAC, has not operated as a PAC, has not raised funds under the promise of spending them to support or oppose Federal candidates and has not, during the existence of the organization, donated funds to Federal candidates nor has the organization expended funds to support Federal candidates.

EFA was founded in 2022. At the time, the founders mistakenly believed that all organizations intending to support candidates were “political action committees” without understanding the distinction between “political committees” and “political action committees” under North Carolina law.<sup>1</sup> In addition, the founders mistakenly believed that because EFA intended to impact elections, any elections, it had to register with the Federal Election Commission.

Despite its registration with the FEC on February 24, 2022, EFA has not operated as a Federal PAC and has not contributed to Federal candidate committees nor has it raised funds for the purpose of contributing to Federal candidate committees. It has not solicited funds for the purpose of supporting or opposing Federal candidates nor has it spent any funds on supporting

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<sup>1</sup> NCGS Section 163-278.6(74) and 163-278.38Z

Federal Election Commission  
Attention: Kathryn Ross

Federal candidates. It has not donated directly to candidates or candidate committees of any sort, Federal, State or local. Since EFA's inception, the only funds spent supporting or opposing candidates are listed on Exhibit 1, attached hereto.

The founders and current board members of EFA have always intended to focus solely upon State and local races within the State of North Carolina. Consistent with its name, the majority of EFA's fund raising and spending has been in support of county school board candidates.<sup>2</sup> Attached as Exhibit 2 is a list of the names and locations of the donors to EFA since its inception. Of the 54 donors listed, all but 7 are from North Carolina. While the list is not exclusively made of North Carolina residents, the list does support our contention that EFA has been focused on matters inside of this State.

Also attached as Exhibit 3 are copies of all fundraising solicitations or appeals from EFA. Without exception, the solicitations reference matters solely within North Carolina, specifically education related matters. There are references to legislative action, matters of concern at specific local school boards in North Carolina and local and State school policies.

I am also attaching as Exhibit 4 an affidavit signed by EFA Chair and founder, Sloan Rachmuth. In the affidavit, Ms. Rachmuth explains the decision to register with the FEC and sets out EFA's activities since its registration.

Registering with the FEC and filing reports with the FEC was a regrettable misunderstanding of both the nature of political organizations and the jurisdiction of the FEC. EFA is up to date in its FEC filings, so there has been no attempt at subversion of the obligation to report its activities. EFA simply misunderstood the proper reporting authority and will now have to take corrective action. EFA is currently preparing the proper reports to the North Carolina State Board of Elections in order to be current on its filing obligations.

On behalf of EFA, I respectfully request that the Commission dismiss the complaint filed in MUR 8114, as the FEC has no real jurisdiction. In connection with this Supplemental Response, EFA is filing Form 99 and final Form 3X.

Very truly yours,



Roger W. Knight  
Roger W. Knight P.A.

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<sup>2</sup> See Exhibits 2 and 4

Federal Election Commission  
Attention: Kathryn Ross

cc: Kevin McQueen  
Federal Election Commission, Reports Analysis Division (via U.S. Mail)

Exhibit 1

**List of candidates, dates, and amount spent:****May 2022** - Ralph Hise, NC Senate - \$2,327.08**May 2022** - Paul Holcombe Superior Court, Johnston County - \$2,314**November 2022** - Sandy Moyer, Board of Education - \$800**November 2022** - Laura Blackwell, Cabarrus Board of Education - \$317.83**November 2022** - Melanie Freeman, Cabarrus Board of Education -  
\$317.83**November 2022** - Sean Turner, Cabarrus Board of Education - \$317.83

Exhibit 2

Eileen	Allen	4108 Rollisby Ct.	Apex	NC	27539
rod	allen	406 N 15th St	Wilmington	NC	28401
Robin	Anders	800 Woods of McCoy Rd	New Hill	NC	27562
James	Anthony Jr	1201 Edwards Mill Rd	Raleigh	NC	27607
Connie	Archuleta	995 Maple Hill Rd	Liberty	KY	42539
John	Boesch	119 Cobalt Creek Way	Holly Springs	NC	27540
Robert	Bortins	625 E Hedgelawn Way	Southern Pines	NC	28387
James	Botts	5319 Lair Drive	Greensboro	NC	27407
Judith	Carlton	310 Whisperwood Dr	Cary	NC	27518
Virginia	Craft	16323 Platinum Dr	Spring Hill	FL	34610
Brett	Curle	80 Packforest Road	Taylors	SC	29687
Mary	DeMartino	5366 7LKS W	West End	NC	27376
Jonathan	Dowdy	19918 Weeping Water Run	Cornelius	NC	28031
bridget	Echirico	32520 Archdale Drive	Chapel Hill	NC	27517
Courtney	Eccard	506 Daylily Ct	Carthage	NC	28327
Michelle	Entrop	6413 Sassafras Ln	Raleigh	NC	27614
Jeff	Finch	3089 Mavisbank Circle	Apex	NC	27502
Rick	Foster	529 Ridge View Dr	Cameron	NC	28326
Shelley	Freeman	33532 Agua Dulce Canyon Rd	Agua Dulce	CA	91390
Heather	Gaskins	402 Stowe Rd	Belmont	NC	28012
Pat	Gavigan		Raleigh	NC	
William	Halprin	152 Lombard St	San Francisco	CA	94111
Sarah	Harden	326 Forsyth St	Raleigh	NC	27609
Gina Krause	Hayek	443 Shadowdale Lane	Rolesville	NC	27571
Matt	Henry	2425 Monticello Dr	Gastonia	NC	28056
David	Hensley	9796 Aberdeen Rd	Aberdeen	NC	28315
Gail	Hester	243 Maple Twig Court	Fuquay Varina	NC	27526
Andrew	Johnson	487 Alexis Dr	New Bern	NC	28562
Christopher	Johnson	1 Carolina Shore Pkwy	Carolina Shores	NC	28467
Lucy	Jordan	4624 Gamelyn Walk	Raleigh	NC	27612
Thomas	Kakadelis	420 Midland Dr	Pinehurst	NC	28374
Penny	Kavanaugh	11107 Lakes Dr	Seven Lakes	NC	27376
Earl	Key	207 Tartan Trail	Southern Pines	NC	28387
Fran	Lavery	4935 Ocotillo Rd	Las Cruces	NM	88011
Eric	Leibman	2520 SW Bertha Blvd	Portland	OR	97239

Exhibit 2

Steve	Mccarroll	2654 London Ln	Winston-Salem	NC	27103
Caroline	Miles	PO Box 579	Pittsboro	NC	27312
colleen	miller	3912 Bentley Brook Dr	Raleigh	NC	27612
Olivia	Oxendine	2400 N McMillan Ave	Lumberton	NC	28358
Steven	Page	90009 Hoey	Chapel Hill	NC	27517
Lynne	Patton	3535 Forbush View LN	East Bend	NC	27018
Matthew	Peragine				
Gerald	Potts	102 Trombay Drive	Wilmington	NC	28412
Sloan	Rachmuth		Apex	NC	
John	Richardson	151 Fearrington Post	Pittsboro	NC	27312
Joyce	Rogers	112 Caudle Meadows Dr.	Advance	NC	27006
Craig	Seibert	406 Lynderhill Ln	Matthews	NC	28105
Gary	Sephton	1457 Kelly Rd	Apex	NC	27502
Thomas	Shuford	1229 Camelot Court	Lenoir	NC	28645
Danielle	Simpson	4806 Ferncrest Dr.	Greensboro	NC	27410
Tony	Spencer	405 Dixie Trail	Raleigh	NC	27607
Patsy	Surles	1972 Godwin Lake Rd	Benson	NC	27504
Thomas	Truden	2711 Fishermans Dr NW	Concord	NC	28027
Frank	Young	383 Wampee St NW	Calabash	NC	28467

VIA WIX FOR EVENT TICKETS, no addresses provided

Scot	Rapp
Paul	Galletta
Jessica	Cook
Janet	Kraft
Sean	Strain
Forrest	Leah
Chad	McHenry
Craig	Seibert
Donna	Lally
Jonathan	Barbee
Karen	Henning

Exhibit 2

Shelly	Chandler
Bill	Fountain
Rick	Dunlap
Cheryl	Davis
Jane	Cornell
John	Wright
Sarah	Absher
Sarah	Keeter
Peter	Morcombe
Bill	Montross
Alton	Absher



Exhibit 3-A



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Exhibit 3-A

## **Mainstream media shuts down the truth.**

### **We expose it and get results:**

Six months ago, we exposed biological boys were hurting girls in high school sports. As a result, the General Assembly passed Fairness in Women's Sports Act last week.

Our team has been reporting on ECU's "gender" clinic for kids 4 and up for months. A week after exposing ECU's plan to spread these clinics across rural North Carolina, chairs of the Senate Health Committee proposed a bill to divest tax dollars from organizations offering child sex change services.

***We need your help to expose the truth of the Left's radical war being waged on our children in schools and in clinics.***

**Can you sponsor the work of our hard-working journalists?**

***We need voices for truth and accountability now more than ever!***

**Your financial gift is critically important to our work. Please give your best gift HERE.**

GIVE

Share on social



Our website 

Exhibit 3-A

Exhibit 3-B



# Please Support Us!

It's not too late to give!

Exhibit 3-B

# #GivingTuesday



Exhibit 3-B

**Dear Friends of Education First Alliance,**

Today is **Giving Tuesday**, the International Day of Giving.

This Giving Tuesday, we need YOUR help to fund our vital work supporting children and fighting indoctrination and grooming in K-12 North Carolina schools.

Can we count on you?

Let's do this TOGETHER!

With sincere appreciation,

Sloan Rachmuth

Education First Alliance PAC President

GIVE HERE

Share on social



Our website 

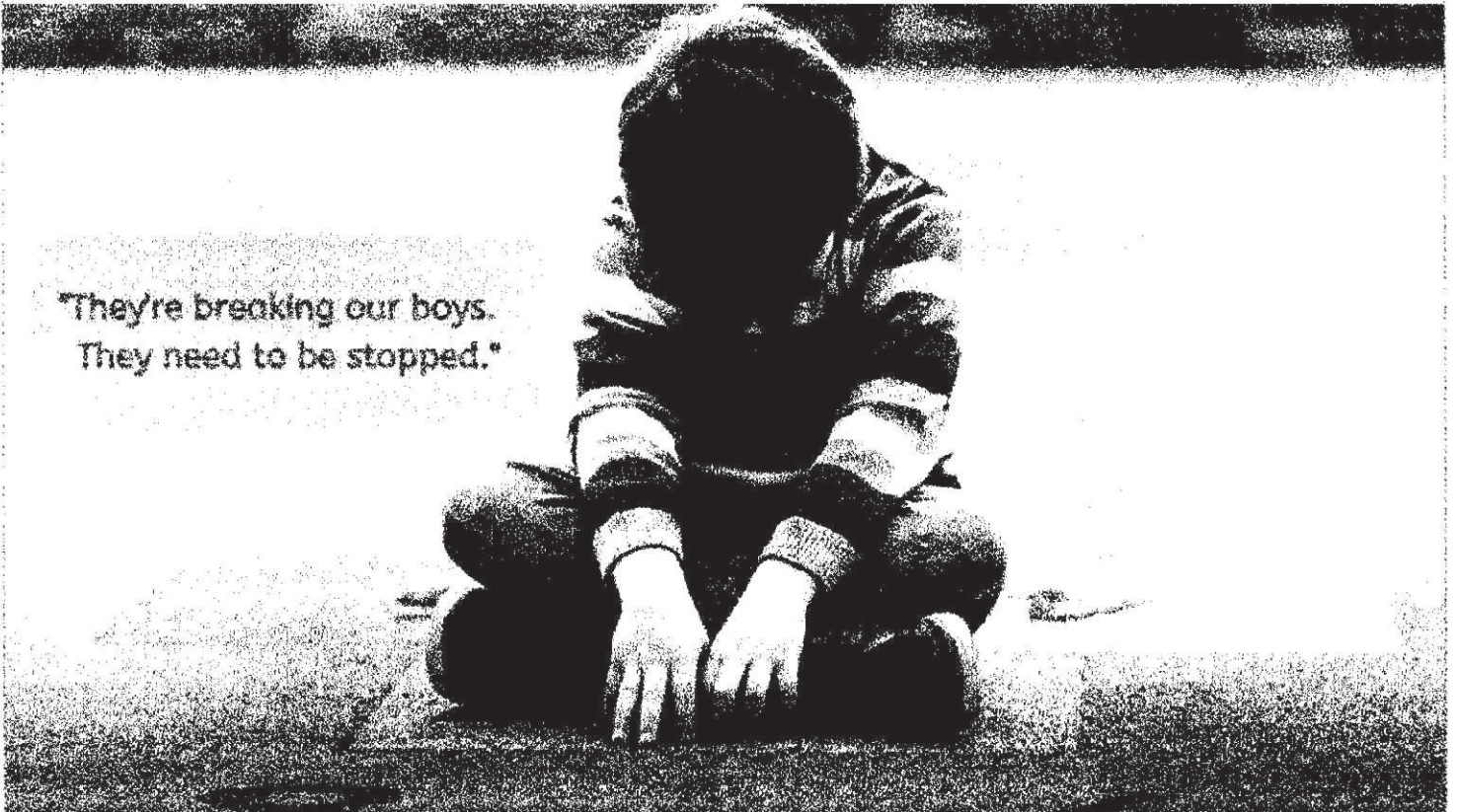
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Join us on our members app to stay updated and keep in touch.

 [Download & Join](#)



Exhibit 3-C



"They're breaking our boys.  
They need to be stopped."

**Education First Alliance** stepped in to provide support to a family of a 6 year-old special needs boy when a Charlotte principal called 911 regarding unsubstantiated allegations of sexual harassment.

Exhibit 3-C

Dear \${contact.Name.First} ,

We cannot thank you enough for your donation which funds our advocacy.

With your support, we were able to help children who were mistreated by school officials through investigative journalism, as well as connect them with legal and educational resources.

**In the past year and a half, we have published 90 stories exposing these important topics:**

- CRT in NC schools
- The dangers of the Transgender grooming agenda
- NC schools hiring predatory teachers
- Out-of-control school violence
- Fraud and abuse from the top at the Department of Public Instruction

**We must get conservatives elected all over the state to make a greater impact on public education.**

**Which is why we need your support now more than ever!**

We are expanding outreach efforts to include people who are concerned about the direction of education, but haven't consistently voted for conservatives.

**You can help us reach our goal of converting 10K voters in three North Carolina districts from progressivism to conservatism!**

PLEASE GIVE

Share on social



Our website →



Exhibit 3-C

Join us on our members app to stay updated and keep in touch.

 [Download & Join](#)

Exhibit 3-D



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Exhibit 3-D

## **Mainstream media shuts down the truth.**

### **We expose it and get results:**

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***We need your help to expose the truth of the Left's radical war being waged on our children in schools and in clinics.***

**Can you sponsor the work of our hard-working journalists?**

***We need voices for truth and accountability now more than ever!***

**Your financial gift is critically important to our work. Please give your best gift HERE.**

GIVE

Exhibit 3-D

Share on social



Our website 

Exhibit 3-E



**THE LEFT WANTS YOUR KIDS.  
WE'RE FIGHTING BACK.**

**It's time to pass NC's Parental Rights Bill**

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## Exhibit 3-E

Last year, we began our campaign to protect families and children in our state from **critical race theory and Transgender grooming in the classroom**. With our grassroots movement, we asked the general assembly to pass legislation to :

- Prohibit school discussions on sexual orientation and gender identity in K-12
- Reverses Superintendent Catherine Truitt's policy to allow children to change their gender and legal name on their official school records, often without parental knowledge
- Allow children to choose pronouns without parental consent
- Require written parent permission for in-school mental health providers
- Prohibit School officials from conspiring to hide emotional changes from parents INCLUDING gender dysphoria
- Give parents the right to sue schools for violations of civil rights and get attorney's fees if they win

**Yesterday, the Senate passed North Carolina's Parents Bill of Rights with nearly all of what we asked for! Now the bill is on the way to the NC House for approval.**

**Now Progressive LGBTQ groups like Equality NC and the Trevor Project have descended on North Carolina promising to bring "payback" to all who vote for the bill.**

**WE ARE ON THE TIP OF THE SPEAR IN FIGHTING BACK!**

PLEASE help us fuel this fight with a \$10, \$15, or \$25 monthly contribution to Education First Alliance.

***Our journalism and activism depend on your support—and are driving the anti-Marxist education agenda.***

Exhibit 3-E

CONTRIBUTE

Share on social



Our website 

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Join us on our members app to stay updated and keep in touch.

 [Download & Join](#)



Exhibit 3-F

**VOLUNTEER**

**DONATE**

The Left has been building a war chest of thousands of dollars to defeat the parent movement in North Carolina.

Today, we are fighting back against the ***teachers union*** and their radical allies on the ground.

The NCAE teachers union is prepared to spend a record amount to defeat all of us. In fact, the latest spending report shows that the NCAE has already raised \$100K to campaign ***for critical race theory*** and ***against school choice***.

But can win. We can SAVE OUR CHILDREN AND OUR SCHOOLS.

***But we can't do it without YOU.***

**Please consider donating to Education First Alliance while we battle the left's seemingly endless resources.**

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CONTRIBUTE NOW

Share On Social



WEBSITE 

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Join me on the Wix mobile app to stay updated, share posts and keep in touch.

Exhibit 3-F

 [Download & Join](#)

Exhibit 4

State of North Carolina  
Wake County

Affidavit of Sloan Rachmuth

The undersigned Affiant, being duly sworn, states as follows:

1. I am the founder and Executive Director ("ED") of the Education First Alliance (hereinafter "EFA"). As the ED I am responsible for the operations of EFA.
2. From the outset, it has been my intention to make sure EFA complied with all laws and regulations, especially with regards to required disclosures of donors of expenditures and transparency of the organization's financial activities. From the outset it was my understanding or belief that, because EFA would be attempting to influence elections, it was required to register with the Federal *Election* Commission.
3. At the time I founded EFA, I was not fully informed that the FEC did not have responsibility for all elections, nor was I informed that State and local elections were handled solely within the State of North Carolina.
4. I was also not aware of the distinction between a *Political Committee* and a *Political Action Committee*. Under North Carolina law, a North Carolina *political committee* can collect contributions from almost any source and in any amount, but operates solely within North Carolina and reports to State authorities. A North Carolina *political action committee* operates under the same restrictions as an FEC – registered PAC, but also operates solely within the State. I am informed that it is common for persons new to political activities to conflate the two different types of organizations into the word "PAC". That was our mistake at EFA and I apologize on behalf of the organization.
5. Since its founding, EFA has operated as a "political committee" also known as an independent expenditure committee. There was never an intention on anyone's part for EFA to contribute directly to candidate committees as a traditional PAC. All of EFA's election-related spending has been for independent expenditures.
6. Neither I nor anyone else connected with EFA has solicited a contribution based upon a stated goal of supporting or opposing candidates in a Federal election. We have not attempted to imply activity in Federal elections. All solicitations have reflected EFA's interest in education issues in North Carolina.
7. All of EFA's independent expenditures have been made to support candidates for either the North Carolina State Legislature or local offices such as school boards.

8. EFA is current in its FEC reports. The obligation to report contributions and disbursements to government agencies is to insure transparency and disclosure. EFA has shown by its conduct it is not trying to hide any contributions or disbursements. It has simply registered and disclosed its activities to the wrong government agency.

9. EFA now has to correct the mistakes. EFA has incurred and will continue to incur substantial expense in closing the FEC registration and registering with the State. State reports will have to be filed dating to the organization's inception. It is my intention to close the FEC registration as soon as possible.

This the 8 day of September, 2023

J. Sloan Rachmuth  
Sloan Rachmuth

Sworn to and subscribe to before me  
This the 8th day, of September, 2023.

[Signature]  
Notary Public



Trisha Schwartz  
Printed Name

My Commission Expires: 7-11-2024