

OFFICE OF
GENERAL COUNSEL

July 24, 2019

2019 JUL 29 AM 11: 20

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

MUR # 7626

RE: Complaint of Violation of Federal Election Laws by candidate Cori Bush (H8MO01143); Cori Bush 2018 Campaign Committee (C00638767); Brand New Congress PAC (C00613810); Justice Democrats PAC (C00630665) During the 2018 Election and the Cori Bush for Congress Campaign Committee (C00638767)¹ Continuing into 2020 Election

Office of the General Counsel:

Cori Bush 2018 Campaign and the Cori Bush for Congress Campaign Committees violated the financing for federal elections by failing to report goods and services received. The contractual relationship and coordinated campaigning actions in the 2018 elections between the Cori Bush 2018 Campaign, Brand New Congress PAC, and its affiliated Justice Democrats PAC violated contribution and expenditure financing rules for a federal election.

The information presented is based on Brand New Congress PAC and Justice Democrats PAC original & current website information, documentaries, articles in print and social media, FEC reports, and personal knowledge.

The Cori Bush 2018 Campaign and the Cori Bush for Congress Campaign share the same FEC Candidate Identification Number but have two different reports filed under the same candidate for the same office. How can the Cori Bush 2018 Campaign go from having \$34,443 cash on hand at the end of year report to the Cori Bush for Congress Campaign starting with \$0 cash on hand? Where is the \$34,440 from the Cori Bush 2018 Campaign? Between the FEC request for the End of the Year Report, Cori Bush for Congress became the committee of record and started filing for both committees. An April 15, 2019 report filed by the Cori Bush 2018 Committee amends the October 2018 FEC Report increasing the cash on hand to \$34,440 Cash on Hand. In December 2018 the Cori Bush for Congress Committee files the end of the year report with \$0 Cash on Hand. The sequence these committees report to the FEC is convoluted and the existence of the \$34,440 gets lost in the shuffle.

Additionally, Cori Bush 2018 had radio commercials on at least two stations 7 days out and through Election Day, playing many times each day with the disclaimer recorded by the candidate. The FEC reports do not show disbursements by the Cori Bush 2018 campaign reflective of that amount of radio commercial buys. Who paid for the commercials?

¹Cori Bush 2018 Campaign Committee reports are found under the new name, Cori Bush for Congress (2017-2018)

Cori Bush applied, interviewed and accepted the political agenda to serve as the Brand New Congress PAC and Justice Democrats PAC congressional candidate in the 1st Congressional District. In exchange the PACs handle the operations of Cori Bush's campaign committee(s).

Based on the respondents FEC Reports and my personal belief there exist a contract between Cori Bush 2018 Campaign and Brand New Congress PAC and Justice Democrats PAC. I believe private companies receiving reported payments for "Political Strategies" from the PACs were payments made to further the candidacy of the Cori Bush 2018 Campaign in the form of expenditures for radio commercials; messaging, preparations, speechwriting and coaching, facility and set design, Act Blue, Nation builder, bank accounts and post office boxes set ups, attending social and political meetings, arranging travel, GOTV rallies and completed endorsement applications on the candidates behalf, as well as FEC reporting compliance and other administrative functions paid for by the fundraising efforts of Brand New Congress PAC and Justice Democrats PAC constituting a contribution exceeding the FEC PAC cash and in-kind limits. Neither PAC reports to the FEC any independent expenditures for the Cori Bush 2018 Campaign.

Justice Democrats PAC reported disbursing \$3,800 to the Cori Bush 2018 Campaign Committee and forgiving a debt owed by the Cori Bush 2018 Campaign Committee as an in-kind contribution. The Cori Bush 2018 Campaign does not report to have incurred a loan from or received goods/services from Justice Democrats in the 2018 cycle.

For these reasons I believe the federal campaign contribution rules were and continue to be violated.

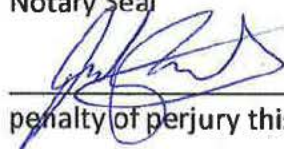
Sincerely,



Michelle Clay

St. Louis, MO 63112

Notary Seal



Sworn to and affirmed the above statement to be the truth under penalty of perjury this day 2nd, of July, 2019.

Notary Seal

Commission Date of Expiration

6/18/2023

JOEL A PINEDA
NOTARY PUBLIC
MONTGOMERY COUNTY
MARYLAND
MY COMMISSION EXPIRES JUNE 18, 2023