MUR805200001



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FEDERAL ELECTION COMMISSION

AUGUST 12, 2022 11:30 AM

OFFICE OF GENERAL COUNSEL

August 10, 2022

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

MUR 8052

Sent via U.S. Mail and email to: EnfComplaint@fec.gov

This Complaint is filed against American Muckrakers PAC, Inc., FEC ID C00776062 for substantial and numerous violations of the federal election campaign laws and Federal Election Commission regulations. The violations are summarized below and evidence substantiating ach violation is attached.

I. Introduction

American Muckrakers PAC, Inc. ("PAC") has violated federal campaign laws and regulations by failing to properly report independent expenditures and failing to include required disclaimers on PAC advertising and solicitation materials. These violations occurred as part of the PAC's aggressive engagement on federal candidate elections through its website, press releases, and social media posts. Most recently, the PAC expressly advocated for the defeat of Lauren Boebert in Colorado's Third Congressional District immediately before the primary election, where the PAC manufactured and broadcast patently false and defamatory statements without the required reporting or disclaimers. See Daniel Dale, Fact check: Democratic group makes multiple false claims in its dramatic allegations about Lauren Boebert's past, CNN (June 25, 2022), available at:

https://edition.cnn.com/2022/06/25/politics/fact-check-super-pac-lauren-boebert-escort-abortion-sugar-daddy/index.html (last visited July 12, 2022).

As detailed below, these violations include failure to report independent expenditures in violation of 11 CFR § 104.4, failure to include required independent expenditure disclaimers in violation of 11 CFR § 110.11, and failure to include required solicitation disclaimers in violation of 11 CFR § 102.5.

II. Violations

A. Independent Expenditures

The PAC has created and maintains the website https://www.fireboebert.com/. On this website, the PAC expressly advocated the defeat of Rep. Boebert in the June 28, 2022, primary election. The website contained the explicit words "fire Lauren Boebert" to advocate her defeat and is subject to the only reasonable interpretation that it advocated a vote against Rep. Boebert in the primary election. See **Exhibit A**.

FEC Complaint: Muckrakers

Page 2

The PAC created a video and other communications that it distributed to voters via the website and social media posts in the weeks prior to the primary election that expressly advocated against Rep. Boebert, explicitly supporting Rep. Boebert's primary opponent by stating "Vote for Colorado Senator Don Coram for Congress" and also urging "No. Second. Term. For. Lauren. Boebert." "@AdamForColorado can win and we like him a lot! Please follow him and support him." See **Exhibit B.** There is a substantial amount of time and expense involved in the PAC's efforts to create and distribute communications that all include the explicit words "fire Lauren Boebert." See **Exhibit C** (including social media posts over about one month, from June 20 through the end of July).

The PAC did not disclose independent expenditures on its FEC Reports of Receipts and Disbursements for this website, content development, or social media distribution as independent expenditures made against Rep. Boebert. In addition, the PAC's website and social media communications omitted the required disclaimer stating that the communication was not authorized by any candidate.

B. Fundraising Solicitations

The PAC solicits contributions on its website via direct donation and donations in exchange for a t-shirt. See **Exhibit D**. The PAC fails to state the disclaimer that the communication was not authorized by any candidate and fails to inform donors that their contributions will be used in connection with a federal election or that they are subject to the limitations and prohibitions of the Federal Election Campaign Act.

Furthermore, we have submitted notice to the Internal Revenue Service that the PAC violated Section 6113 of the Internal Revenue Code requiring political committees to include a special notice on solicitations informing solicitees that their contributions are not tax deductible.

C. Text Communications

The PAC's recent reports include disclosure of expenditures for "text messaging services." See American Muckrakers PAC Pre-Primary report, FEC-1602933, filed 06/16/2022. While I am not in receipt of any texts sent on behalf of the PAC, it is likely that the messages expressly advocated against Rep. Boebert given the other activities and the PAC's mission of having its "sights are set on Lauren Bobert" [sic]. **Exhibit E**. The FEC can obtain these text message communications to determine whether these PAC-funded text messages expressly advocated against Rep. Boebert and if the PAC failed to report these independent expenditures.

III. Conclusion

Muckrakers registered with the FEC as an independent expenditure committee and engaged in express advocacy and electioneering communications without filing required disclosures and including required disclaimers. This letter details specific violations under the FEC's jurisdiction and requests that the FEC investigate the full scope of violations.

FEC Complaint: Muckrakers

Page 3

Muckrakers is not an inexperienced organization that inadvertently failed to comply with legal requirements. This is a well-funded and sophisticated political organization. FEC reports show the organization retained campaign counsel and has engaged in multiple federal elections. Muckrakers pays high retainer amounts to its professional political consultant/PAC President and Treasurer, David Wheeler. Despite all of this, Muckrakers chose not to comply with basic federal campaign finance rules. Muckrakers continues to engage in improper conduct through its ongoing activities.

Muckrakers routinely makes false claims against federal candidates and their families to serve its partisan political objectives. It is critical that the public have access to who is responsible for this activity through legally required disclaimers and reporting. Muckrakers chose not to report or disclose its political activity as required by law and it is imperative that the FEC complete an enforcement action to address Muckrakers substantial legal violations.

Thank you for your prompt attention to this ongoing FEC non-compliance matter.

Sincerely,

Jonathan M. Anderson

Jon M. anterson

State of Colorbox Nevada County of	
Signed and sworn to before me on _ by Jonathan Anderson	11th day of August, 2022 (name(s) of individual(s) making
statement).	Notarial act performed by audio-video communication.
(Notary's official signature) Notary Public	Mark A. Braddy NOTARY PUBLIC
(Title of office) 01/07/2026	STATE OF NEVADA Appt. No. 22693701
(Commission Expiration)	Expires January 7, 2026

MUR805200004

EXHIBIT A





Sources Boebert Abortions Tax Fraud Shirts Mike Bishop Drunk Lauren More



Donate Here To Fire Boebert

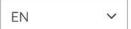
ABOUT FIRE BOEBERT

We helped fire

Madison Cawthorn.

Let's Chat!

https://www.fireboebert.com





Sources Boebert Abortions Tax Fraud Shirts Mike Bishop Drunk Lauren More

Donate Here



Join Our Email List - We'll Keep You Up to Date on Our Progress!

First Name *	
Last Name *	
Email *	
Phone (Optional)	
I'm Interested In:	
Digital Ambassador	
Donate - Call Me!	
Host an Event	
Raise Hell	
Im not a robot	APTCHA ry Terma

Let's Chat!

https://www.fireboebert.com

MUR805200007

Home | FireBoebert.com

Drunk Lauren More



EN ~

Sources Boebert Abortions Tax Fraud Shirts Mike Bishop

into@tirepoepert.com

or

(970) 610-6001

Our mailing address is:

American Muckrakers PAC, Inc.

PO Box 51

Spruce Pine, NC 28777-0051

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Let's Chat!

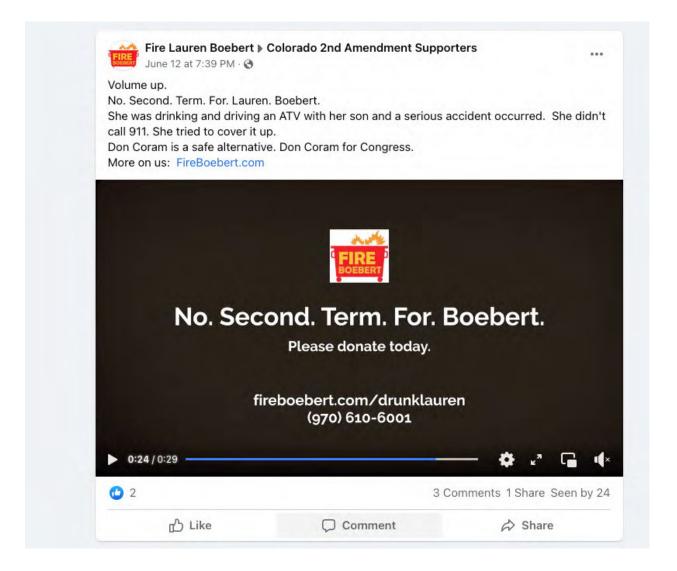
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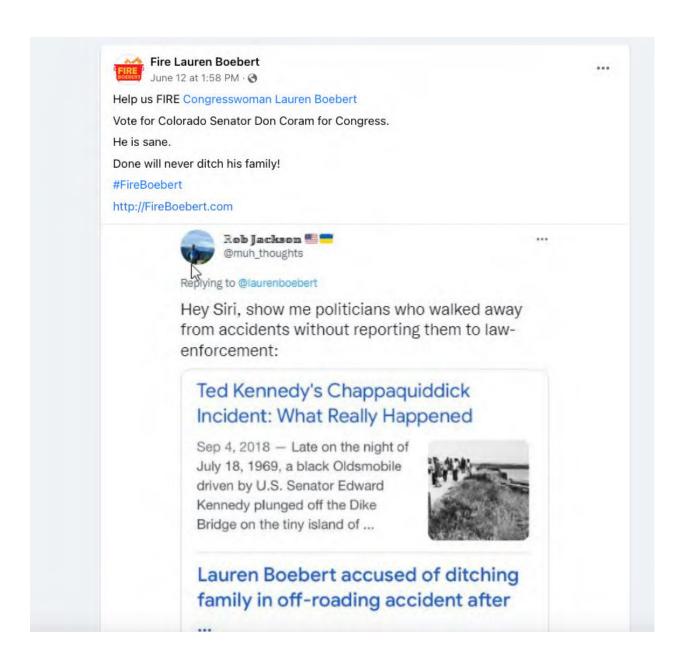
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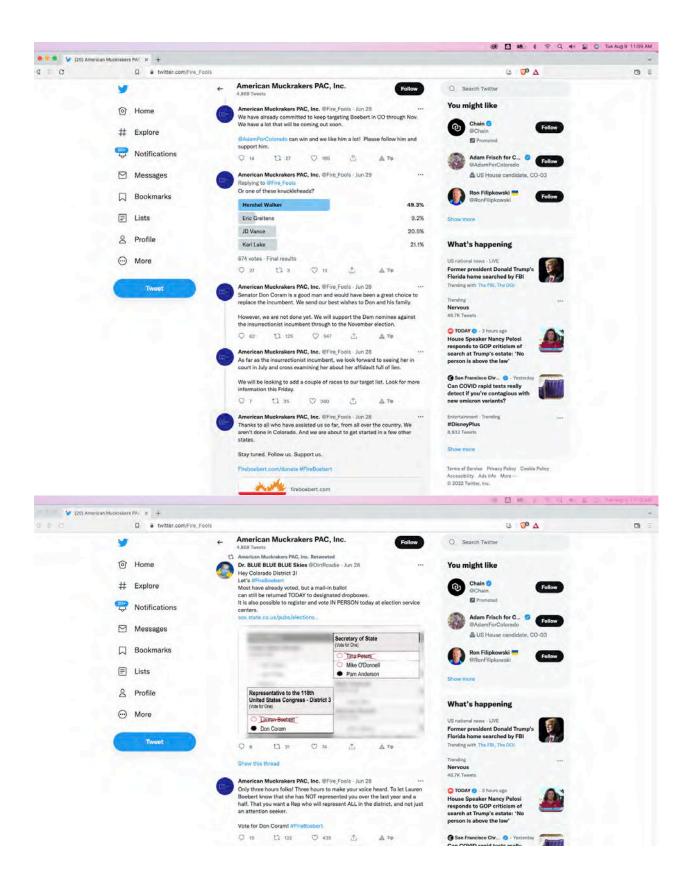
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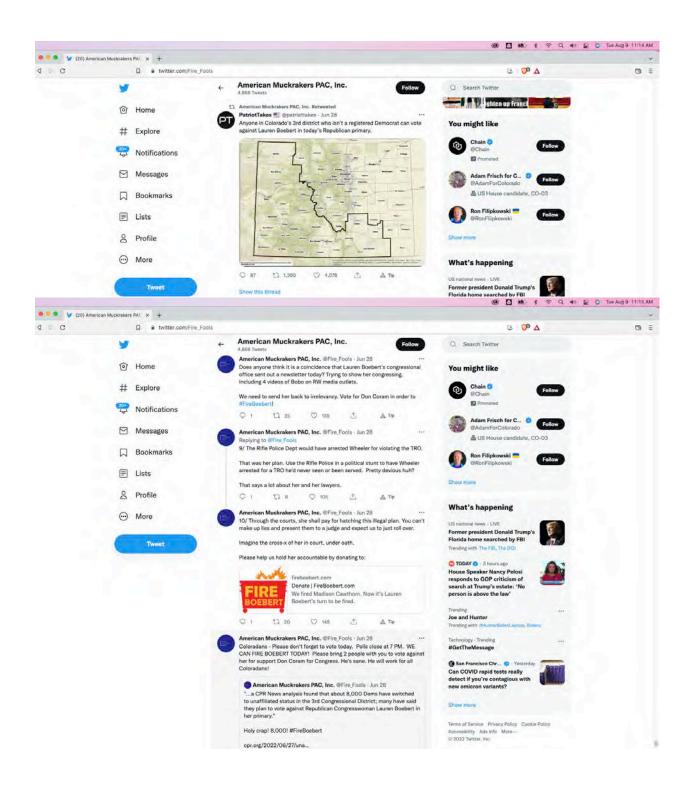
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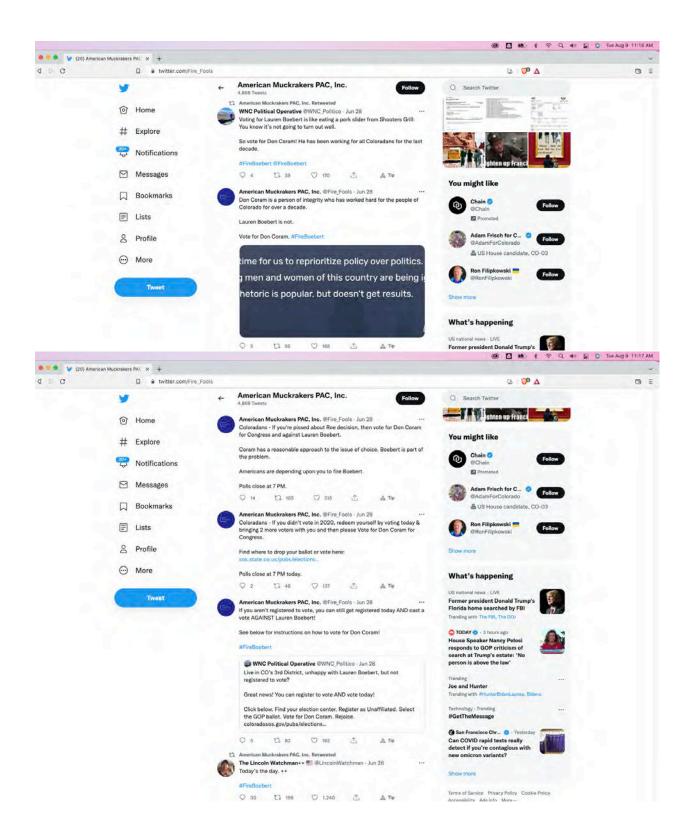
EXHIBIT B

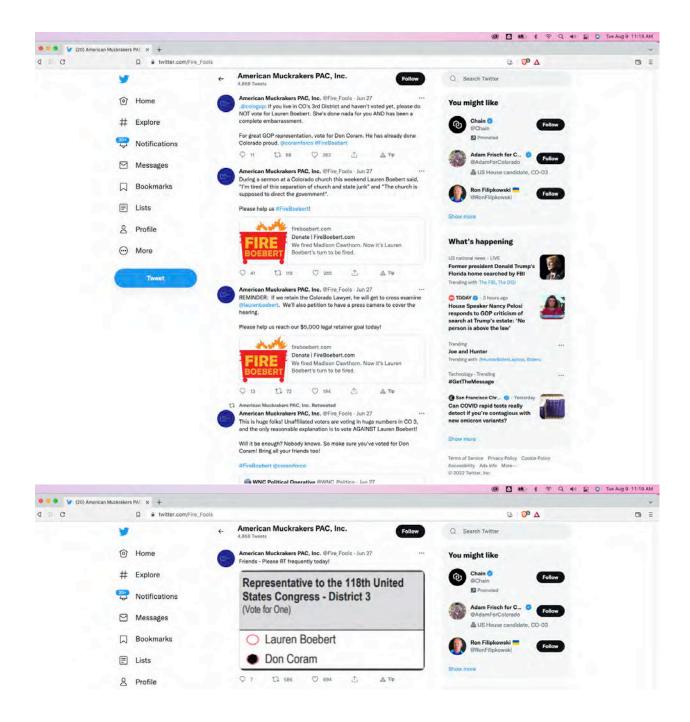


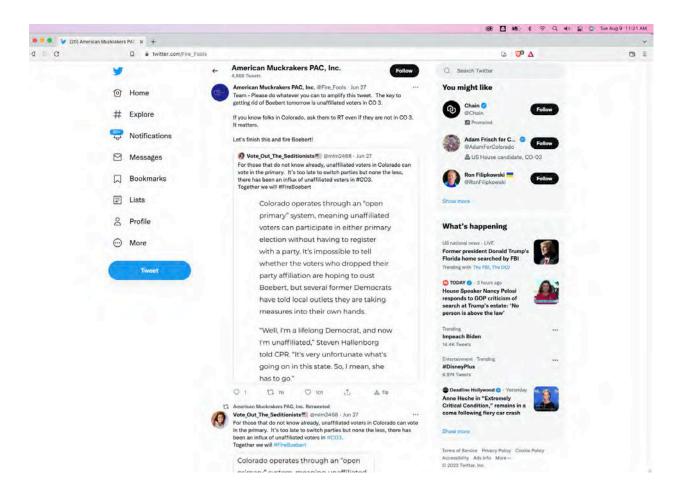


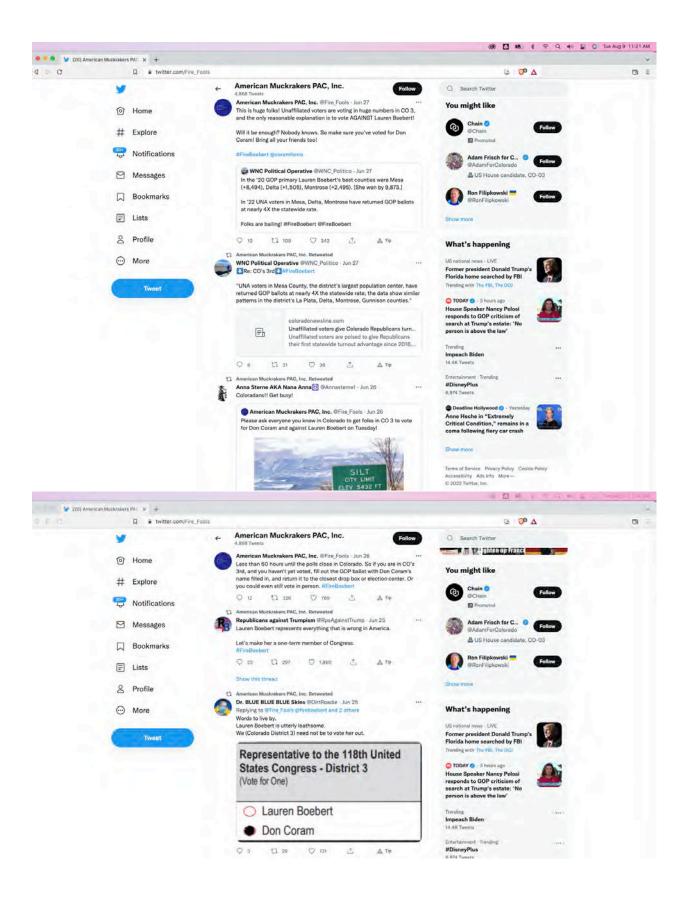


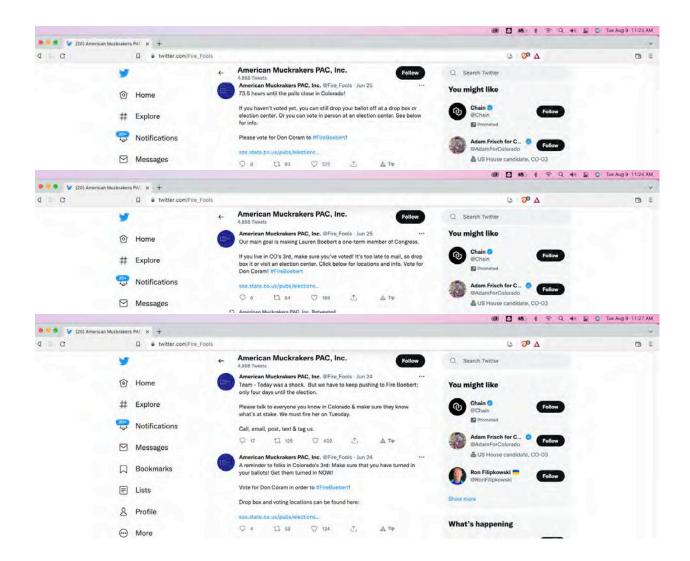


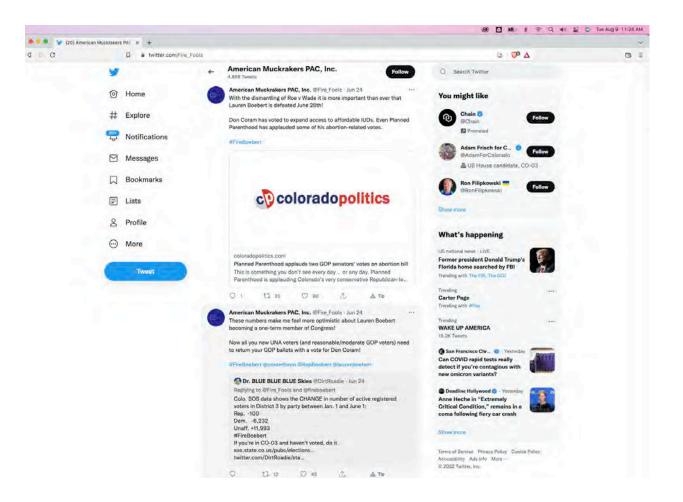


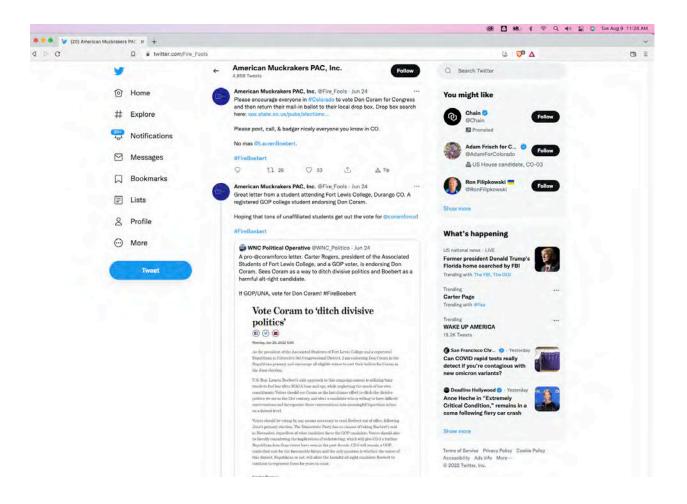


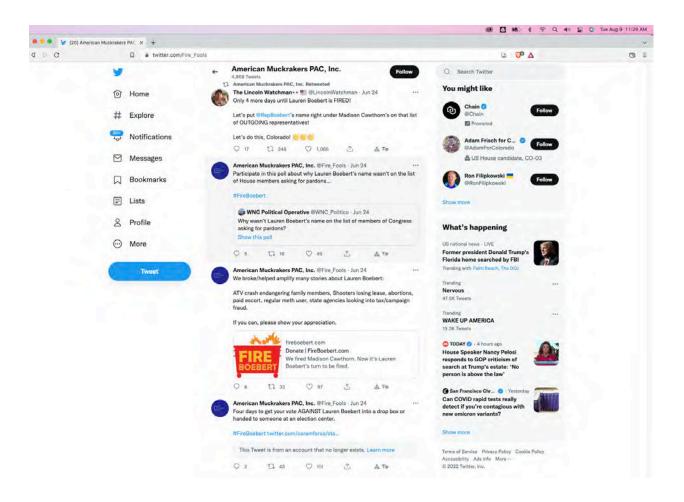


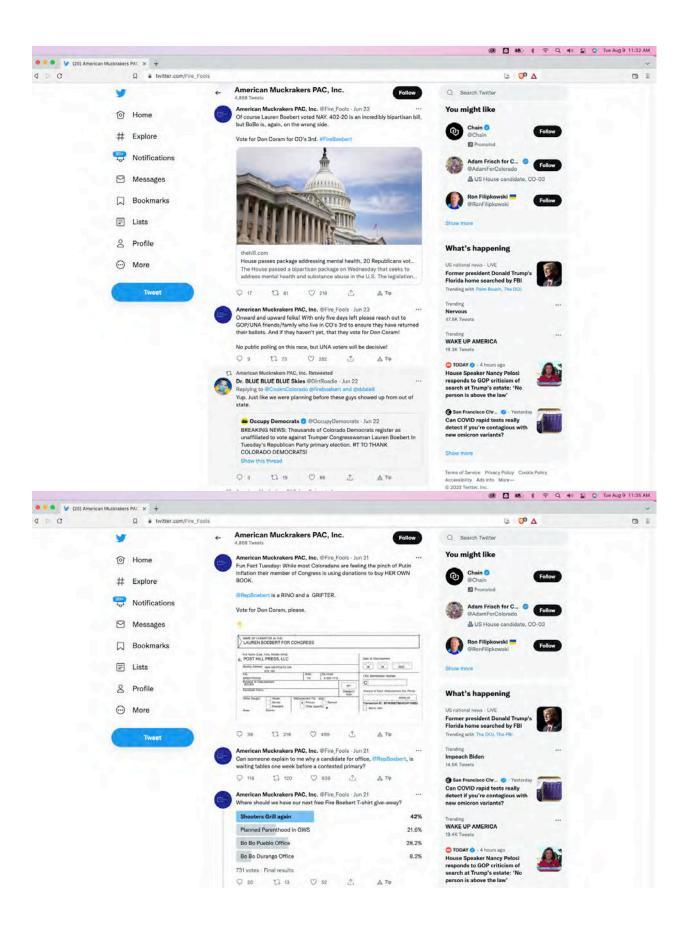












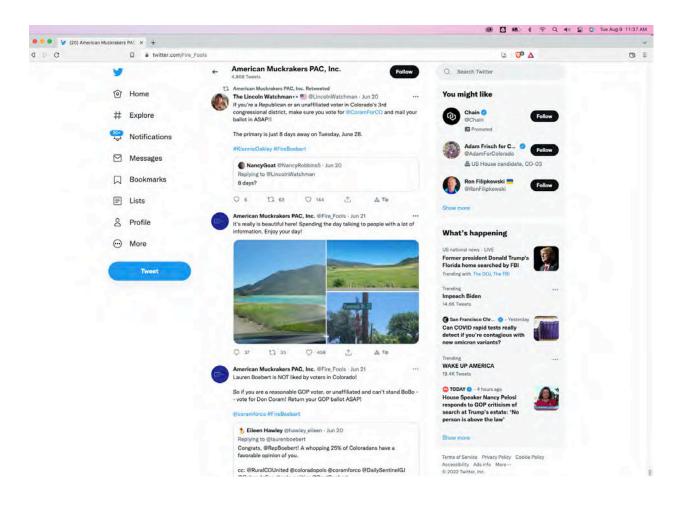


EXHIBIT C





Lauren Boebert Was a Paid Escort and Had Two Abortions

Want More Stories Like This? Please Donate!

Read our Press Release on Lauren Boebert's **Escort Career and Abortions**



FOR IMMEDIATE RELEASE

REP. LAUREN BOEBERT WAS AN UNLICENSED PAID ESCORT WITH SUGARDADDYMEET.COM AND HAD TWO ABORTIONS

BOEBERT MET SENATOR TED CRUZ IN ASPEN THROUGH INTRODUCTION BY KOCH FAMILY MEMBER & "CLIENT"

BOEBERT HAD AN ABORTION AT PLANNED PARENTHOOD IN GLENWOOD SPRINGS, COLORADO DUE TO HER WORK WITH SUGARDADDYMEET.COM

June 14, 2022 - SILT, COLORADO: The American Muckräkers PAC, Inc., today announced their team and volunteers have uncovered that Lauren Boebert was an unlicensed, paid escort and met clients through SugarDaddyMect.com. Text messages show she was bankrupt at the time and looking for "side income" and called her work "pay to play". She was paid to "escort" wealthy men.

According to our investigation, Boebert was hired by a wealthy male client in Aspen, Colorado, who was a Koch family member. Boebert's rich client subsequently introduced her to U.S. Senator Ted Cruz (R-TX) in Aspen. After meeting with Senator Cruz, Boebert was encouraged by Cruz to run for political office. When Boebert amounteed her campaign for Congress in December 2019, Senator Cruz donated at least \$136,250.00 to the Boebert Campaign and helped her raise large sums of money during trips Boebert made. to Texas. Boebert didn't disclose a \$70,500.00 donation made by Cruz until Cruz's Federal Election Commission fillings contradicted her own fillings.

Boebert had an abortion at a clinic in Grand Junction, Colorado, sometime in 2004 or 2005 when she was approximately eighteen years old. It is not known whether this abortion was related to SugarDaddyMeet.com clients or someone clse. Then, Boebert, twenty-three at the time, had an abortion in 2009 at the Planned Parenthood Clinic in Glernwood Springs, Colorado, "due to her work with a SugarDaddyMeet.com elient".

American Muckrakers obtained this information through an exhaustive investigation and a lip from a verified source close to this matter who has requested anonymity for fear of reprisals

(continued)

(Revised 06/14/ (Revised 06/17/

Support Our Work By Donating Here >





Boebert Abortions Tax Fraud Mike Bishop Drunk Lauren Donate

Page 2. June 14, 2022

David B. Wheeler, President of the American Muckrakers PAC, Inc. said the following:

"Lawren Opal Boebert is as big of a hypocrite as Madison Cawthorn. He says one thing and does another. She says she is against abortion but has apparently had at least two abortions. She claims to be a devout Christian but is paid to escort wealthy men without a license and has two abortions she wants to make illegal for other women. She takes money from Ted Cruz but doesn't report it. If she is a law-and-order candidate, imagine what else she'll do to line her pockets. There is clearly no moral line Boebert won't cross and it's all about getting as much money as she can, not the needs of the citizens of Colorado.

Our coalition of Republicans, Democrats, and Unaffiliated voters are pleading with all voters in Colorado's 3rd District to take a good long look at Lauren Boebert and what she does, not what she so

- Boebert had two abortions but says other women shouldn't be able to make this decision.
 Boebert was driving an ATV in Moch and had a serious wreck with her son in the back and her
 sister-in-law is seriously injured she has to be flown to the hospital via life flight.
 Boebert doesn't report the accident as required by Utah law and then actively works to cover up
 the accident two weeks before the primary election, including paying her sister-in-law off to
- remain silent.
- Boebert uses donor money to pay her taxes and restaurant rent.
- Boebert still owes her employees back pay and threatens them if they protest.

 Jayson Boebert has a "consulting" contract for an oil and gas company for \$460,000.00 a year but has zero consulting experience.



Download Press Release and Text Messages Here

Note From FireBoebert.Com Team

We make no judgement about Boebert's abortions. That is her right as a woman in Colorado.

However, we are reporting on the unbelievable hypocrisy of her ralling against women that want that same right. Boebert has consistently been against woman in Colorado and the entire country having the same rights to make their own healthcare

In addition, we don't take a position about the propriety of being a paid escort and respect any men or women that choose this career. However, escorts are regulated in Colorado and must register under state law. We have searched and requested to see her registration without success. If Boebert has an escort registration we will correct our story and apologize to Boebert. However, we aren't holding our breath.

Finally, no one at Planned Parenthood or any other medical practice anywhere provided Boebert's medical records or violated HIPAA rules. We did not consult with or receive any tips from any medical providers, staff, admins, technicians, etc. Nor did we hack or receive any medical records or obtain any information in such a way that would violate any Colorado or U.S. laws. We have never seen any of Boebert's medical records.

All the facts came from a source we trust and others on our team know. We verified the abortion claims with another source. We stand by our story. We've not seen nor heard anything that would refute our allegations if we do, we'll let you know.

After reviewing several dates with our sources, at 8:30 PM on June 14, 2022, we revised our press release to include specific dates of Boebert's abortions and the specific donation amounts from Ted Cruz. Previously, we had round figures for the donations given to us by our source and didn't include any years for the abortions.

In addition, we posted an updated press release on June 15, 2022, at 5:44 PM, without a picture we have been told is someone else. We have contacted the Daily Mail to confirm the identity of the photo as our source still claims it is Boebert.

Lauren Boebert's Actual











Messages Confirming Boebert Was a Paid Escort & Met Koch Family Member on SugarDaddyMeet.com

Source: Our source requested we not reveal their name, location, or any other information.

Note: The screenshots are the actual text messages in sequential order from our source to FireBoebert.com team. Several texts were excluded or part of them excluded to protect their identity. In no case did we edit the actual text sent by our source.



Want More Stories Like This? Donate!





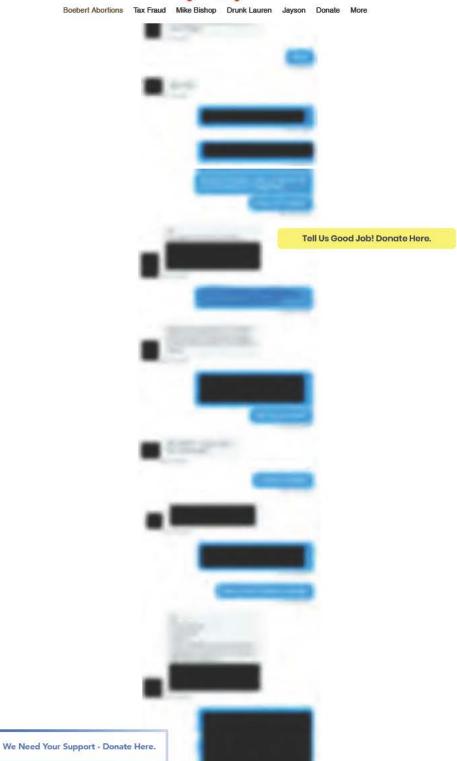


EN

MUR805200028 Boebert Abortions | FireBoebert.com









Colorado Statutes on Being a Paid Escort



FIRE

Fire Lauren Boebert

info@fireboebert.com or (970) 610-6001 Our mailing address is: American Muckrakers PAC, Inc. PO Box 51 Spruce Pine, NC 28777-0051

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Boebert Abortions Tax Fraud Mike Bishop

Drunk Lauren Jayson Donate

Lauren Boebert's Drunken 4X4 Wreck with Son in Vehicle

Exclusive Details Revealed Here

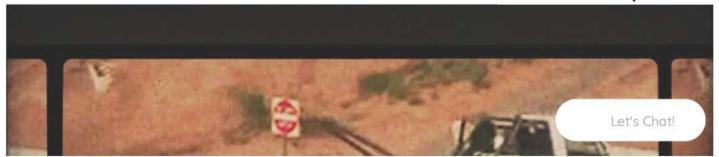
Boebert nearly killed her sister-in-law during a drunk driving accident while driving a 4X4 in Moab, Utah.

Boebert Begged Sister-in-Law to Say Nothing and Covered Up the Accident

Utah and Colorado Officials requested to investigate Boebert for "Reckless Child Abuse" for drinking and driving.

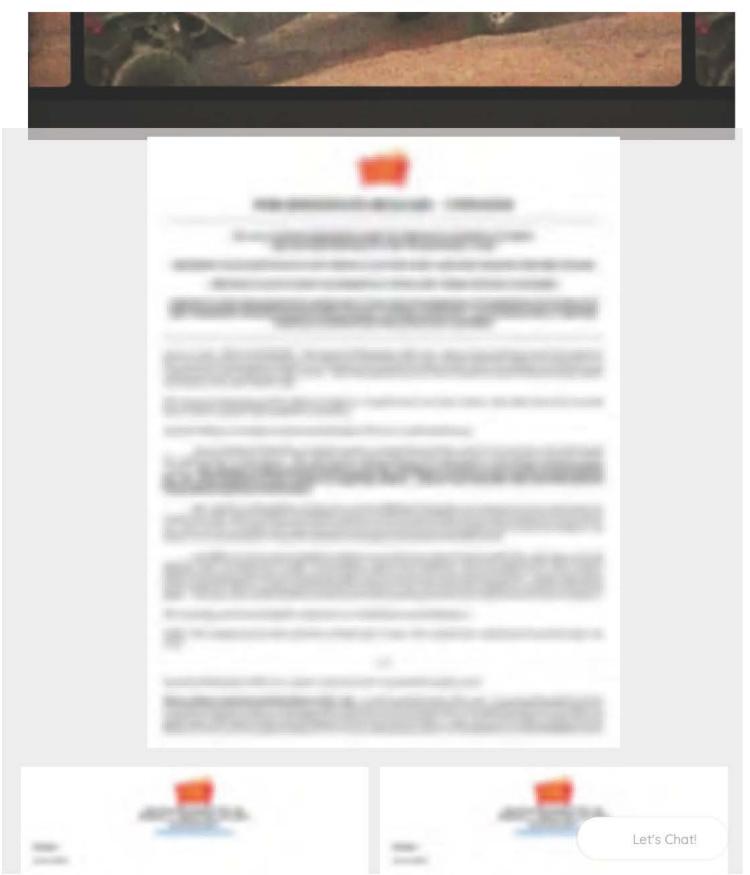
Below are all the details and our press release.

You must watch this with volume up.



















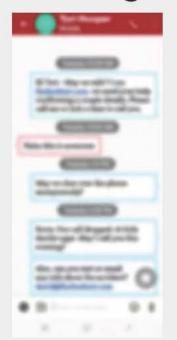
Exclusive Daily Mail News Story Here

Audio of Tic Tac Tow Owner
Confirming Accident



Audio of Tic Tac Tow in Moab, UT Confirming Accident

Tori Hooper Audio and Text Messages











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The Mike Bishop Episodes

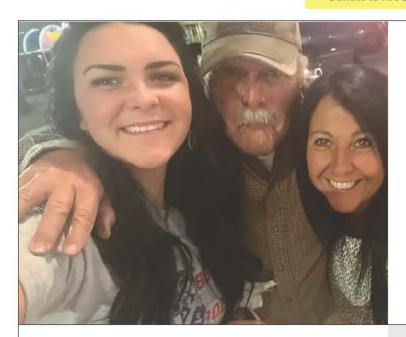
About

On June 1, 2022, one of our team called Mike Bishop to learn more about the plane he sold Lauren and Jayson Boebert. What unfolded was a series of more than 15 calls over the course of a week. During the calls Mike brags about his access to Lauren, how she will do whatever he says, and lots of details about the plane, Lauren and Jayson's money, and politics in Colorado.

This is the sort of supporter Boebert has in Colorado. We hope you'll listen and share with other voters in Colorado and vote Boebert out.

We'll be posting new episodes every couple days. Enjoy.

Donate to Fire Boebert Here



Mike Bishop - Episode One: The N Word

What follows is an excerpt from the first call between our team member and Mike Bishop. During the call he explains why Lauren Boebert bought the plane, describes Jayson Boebert using the "N" word and other details about the plane. Also included, China, Nancy Pelosi, Hunter Biden, guns, and more.



Mike Bishop: Episode 1 - The "N" Word

00:00 / 06:49

Donate to Fire Boebert Here

Episode 2 - "I would bend her over my knee and paddle her..."

Mike is fired up in this episode. We talk about whether Boebert is flying drugs in her airplane.





kid" and that former Congressman Tipton is a "... piece of shit, that did nothing for anyone..." Ed Wilkerson elected her according to Mike. Enjoy.



Mike Bishop Episodes 2

00:00 / 11:40

Donate to Fire Boebert Here





Fire Lauren Boebert

info@fireboebert.com



or (970) 610-6001 Our mailing address is: American Muckrakers PAC, Inc. PO Box 51 Spruce Pine, NC 28777-0051

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FOR IMMEDIATE RELEASE - EXCLUSIVE

REP. LAUREN BOEBERT UNDER INVESTIGATION FOR TAX FRAUD AND MONEY LAUNDERING

COLORADO ATTORNEY GENERAL REFERS OUR COMPLAINT TO DEPARTMENT OF REVENUE
AND DEPARTMENT OF LABOR AND EMPLOYMENT FOR INVESTIGATION

BOEBERT CREATED THIS PROBLEM - NOT ANYONE ELSE SHE MUST TAKE RESPONSIBILITY FOR HER ACTIONS

June 8, 2022 - SILT, COLORADO: The American Muckrakers PAC, Inc., today announced their team and volunteers have uncovered that Lauren Boebert is under investigation by the Colorado Department of Revenue and the Colorado Department of Labor and Employment after a referral from the Colorado Attorney General's Criminal Division on June 7, 2022.

Boebert is accused of falsifying mileage records to pay herself from donations and then use that cash to pay off a tax lien placed on her business by the Colorado Department of Labor and Employment for unpaid unemployment insurance premiums.

David B. Wheeler, President of American Muckrakers PAC, Inc., said the following:

"Colorado citizens should be disgusted with Lauren Boebert. Lauren Boebert created this problem on her own and is finally going to be held accountable. This is what happens when you elect a clown that can't even pay her employees money owed to them or pay the appropriate taxes. She should be ashamed of her actions and immediately apologize to her former employees and the citizens of Colorado.

The liberal media or our PAC didn't cover up this vital information when it occurred. It was Lauren Boebert and her staff that covered it up. They are accountable for this illegal activity. Why didn't Rep. Boebert disclose this information and publicly apologize to the victims? The answer is that Lauren Boebert, just like Madison Cawthorn, never takes responsibility for her bad judgment. This is not the first time she has lied to Coloradans and won't be the last.

Our coalition of Republicans, Democrats and Unaffiliated Coloradans are urging all voters and citizens to review the documents we've filed, then ask Boebert why she covered up this illegal activity and used donor money to pay her taxes? We hope voters will help us fire Boebert by supporting Don Coram for Congress. He's sane and pays his taxes on time, every time.

Anyone that uses donor money to pay their taxes is not fit to hold public office. We hope voters will fire Boebert in the June 28, 2022, primary election and elect Don Coram."

The documents can be downloaded at: FireBoebert.com/taxfraud

##

American Muckrakers PAC, Inc, contact: (970) 610-6001 or press@firemadison.com

More about American Muckrakers PAC, Inc.: American Muckrakers PAC, Inc., is a non-profit political action committee dedicated solely to ensuring terrible politicians are held accountable and hopefully fired. Our first fight was against Rep. Madison Cawthorn (FireMadison.com); he was fired on May 17, 2022. Our current fight is against Lauren Boebert. We are an FEC registered Super PAC. For more information about us: FireMadison.com and FireBoebert.com.



Download Full Press Release and Docs to AG Here

The New York Times





Boebert Abortions Tax Fraud Mike Bishop Drunk Lauren Jayson Donate More
The states attorney general has referred for review a
fraud complaint from the group that targeted
Representative Madison Cawthorn, in a sign of
trouble for the first-term congresswoman.



6/17/22, 11:27 AM



Boebert Abortions Tax Fraud

Mike Bishop Drunk Lauren Jayson Donate More



Fire Lauren Boebert

info@fireboebert.com

or

(970) 610-6001

Our mailing address is:

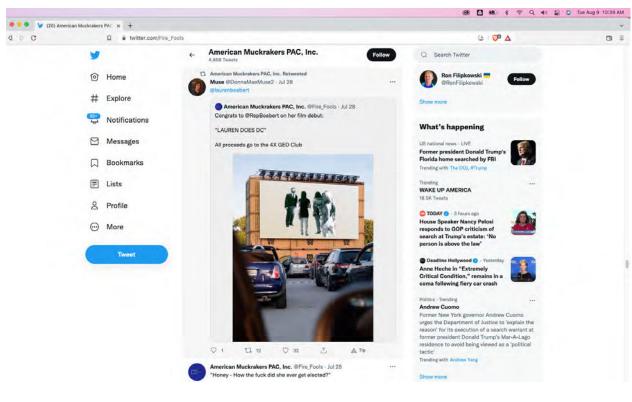
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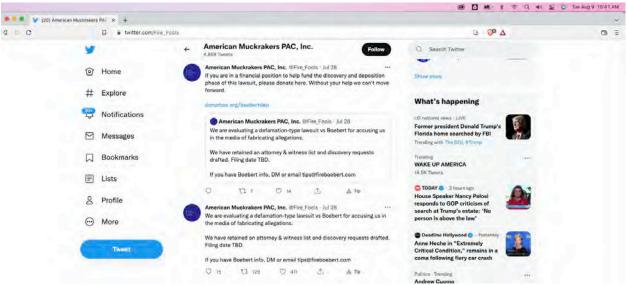
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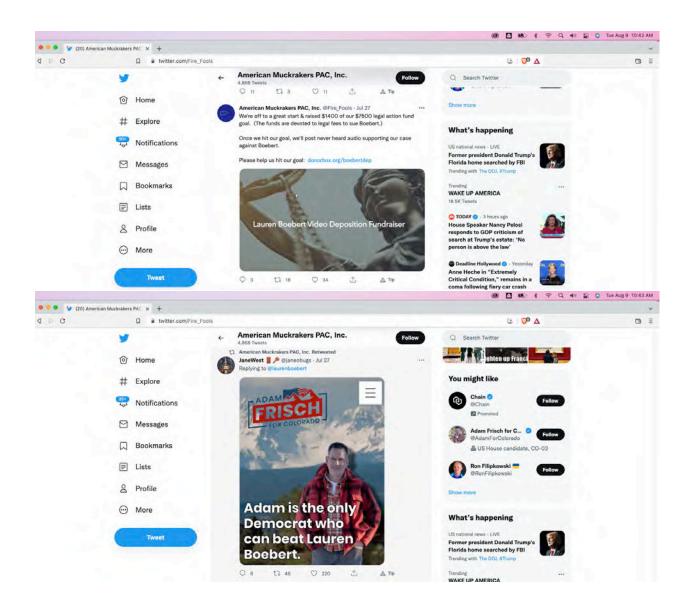
Spruce Pine, NC 28777-0051

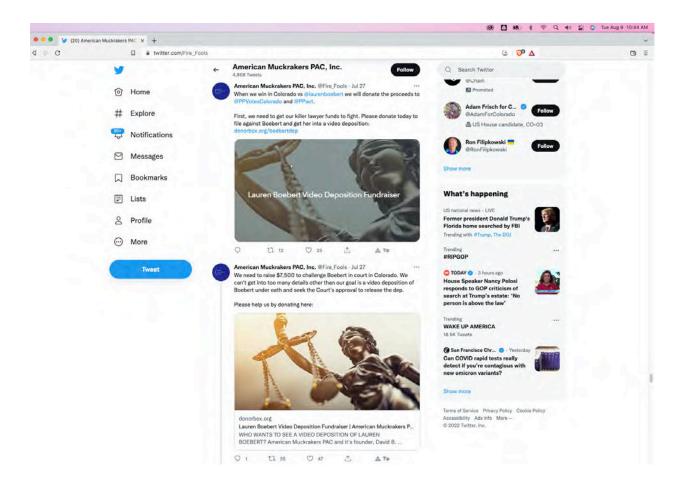
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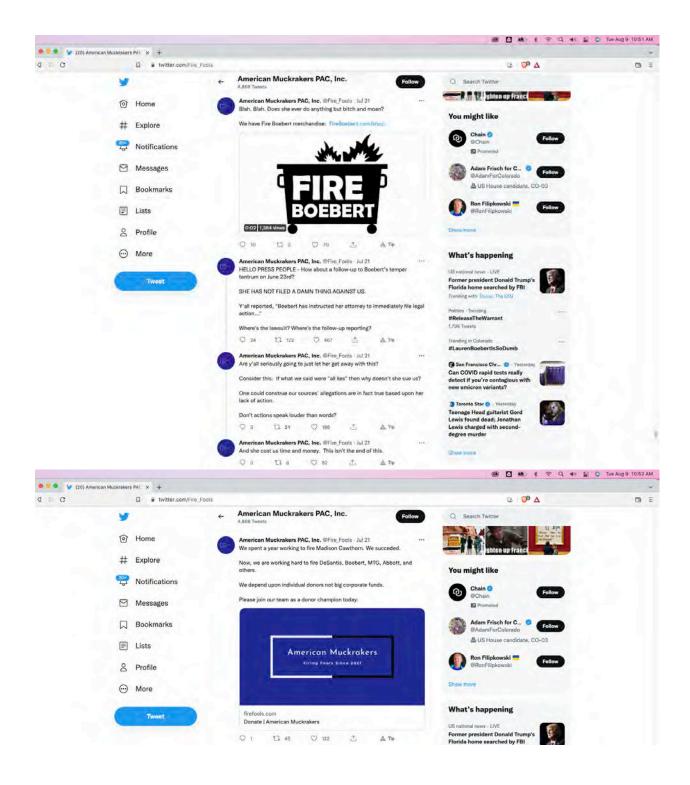
Let's Chat!

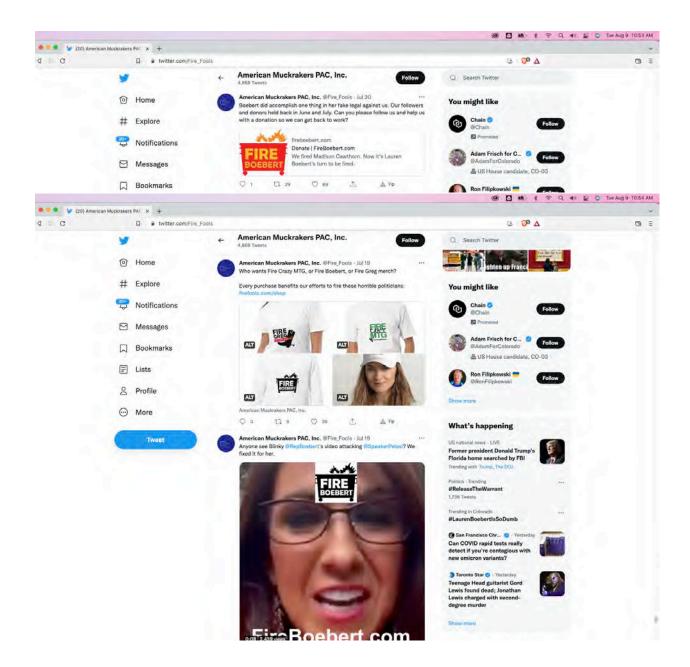


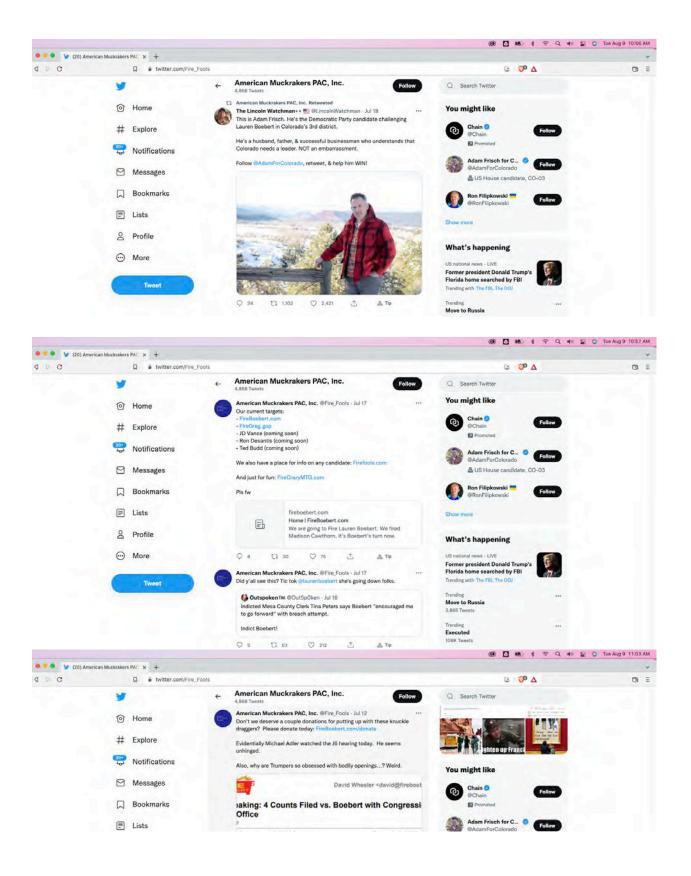


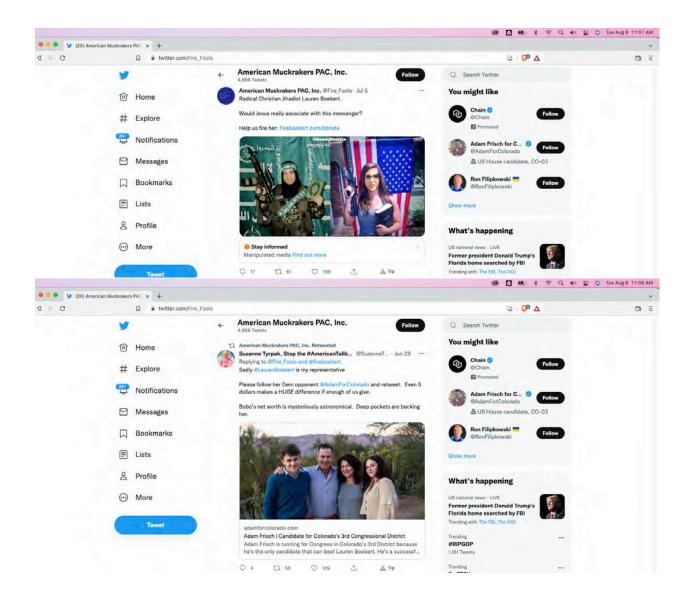


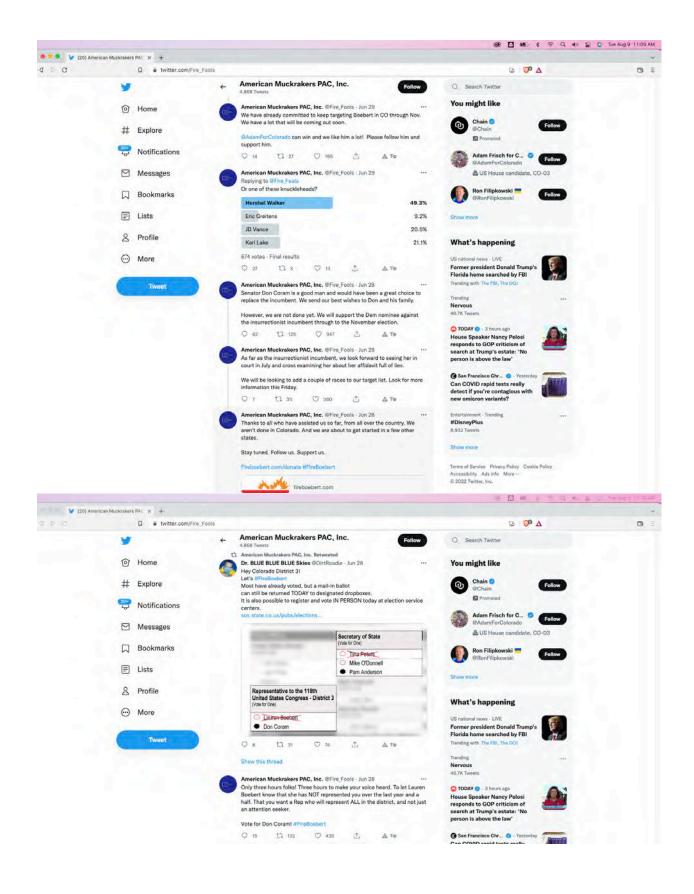


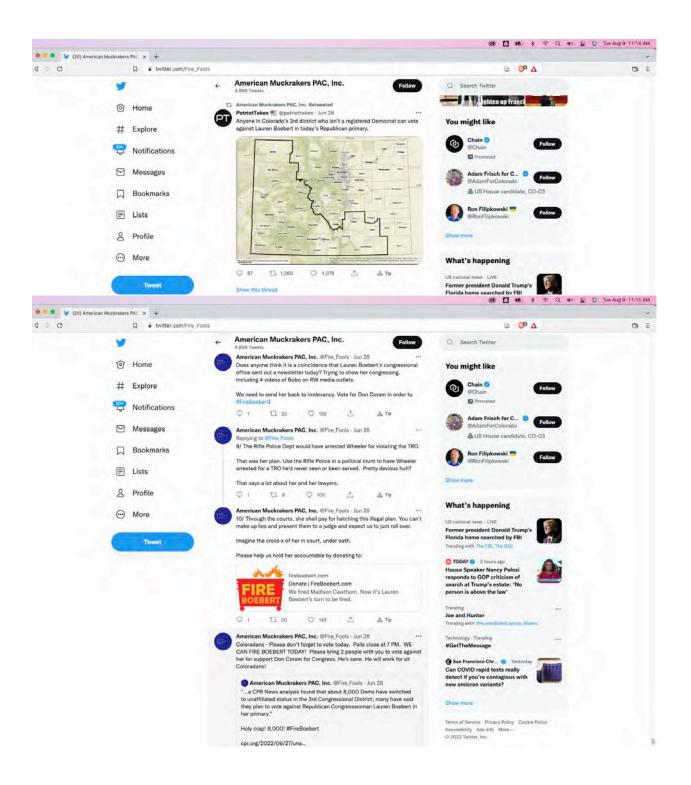


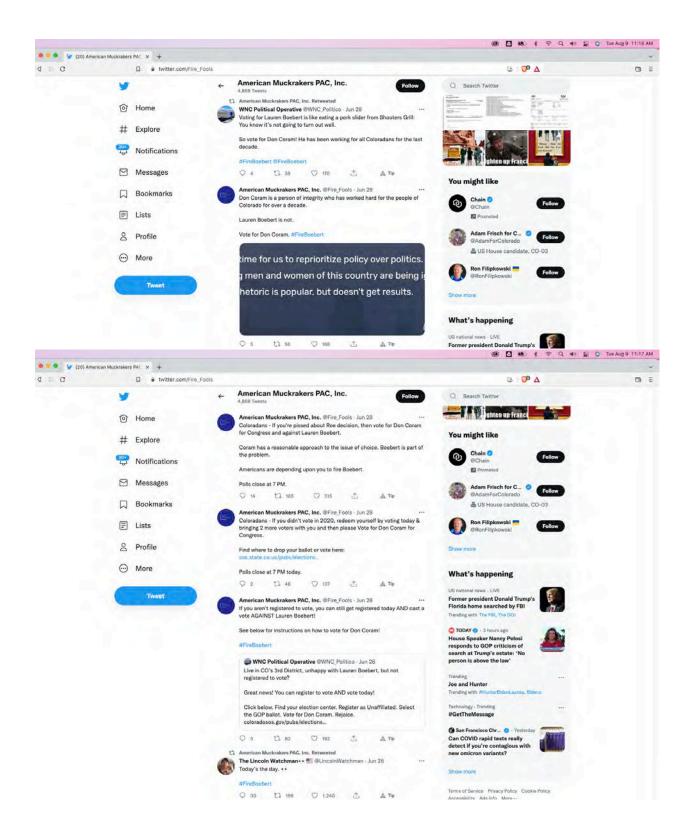


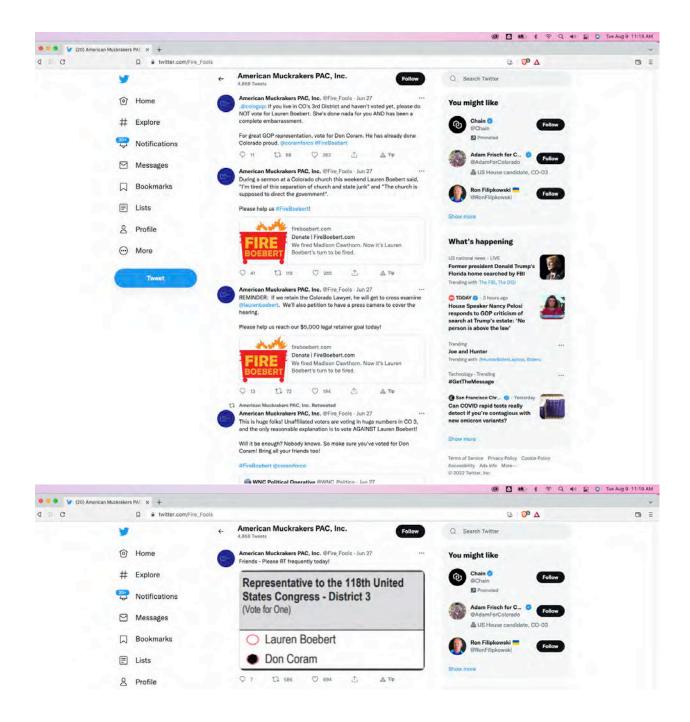


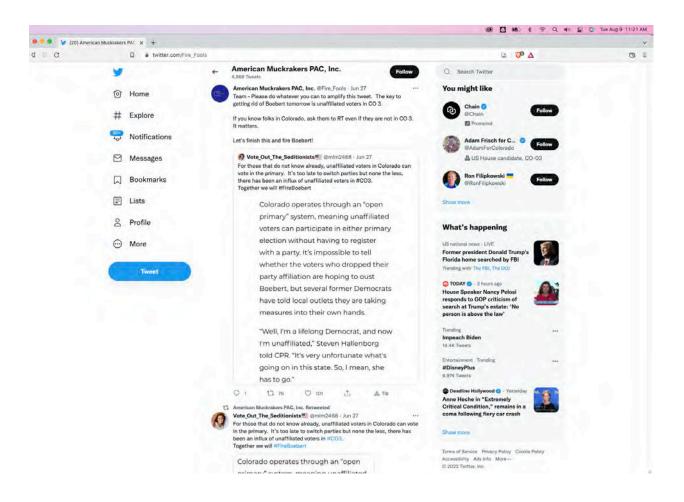


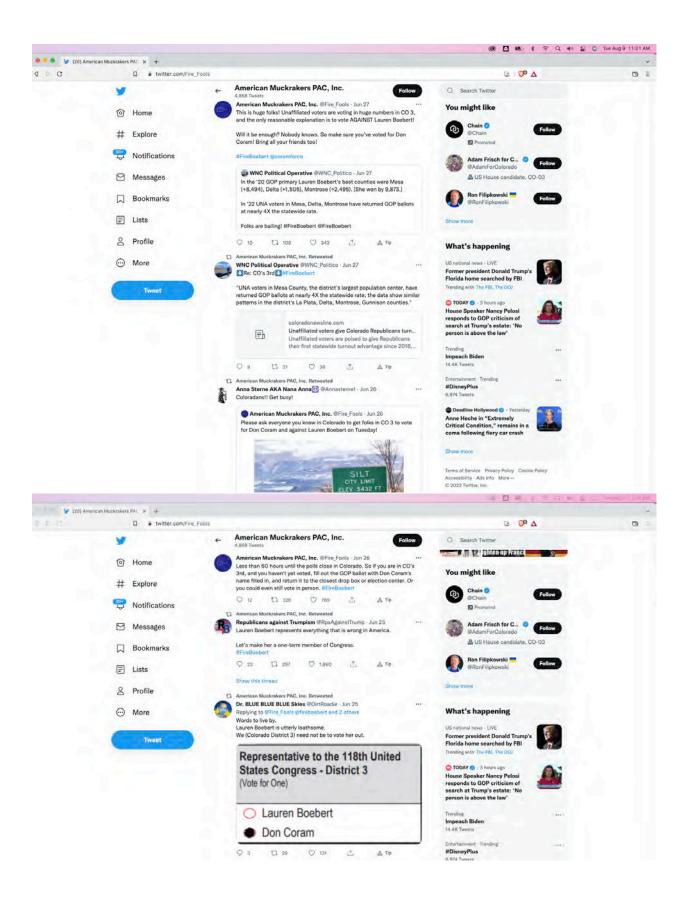


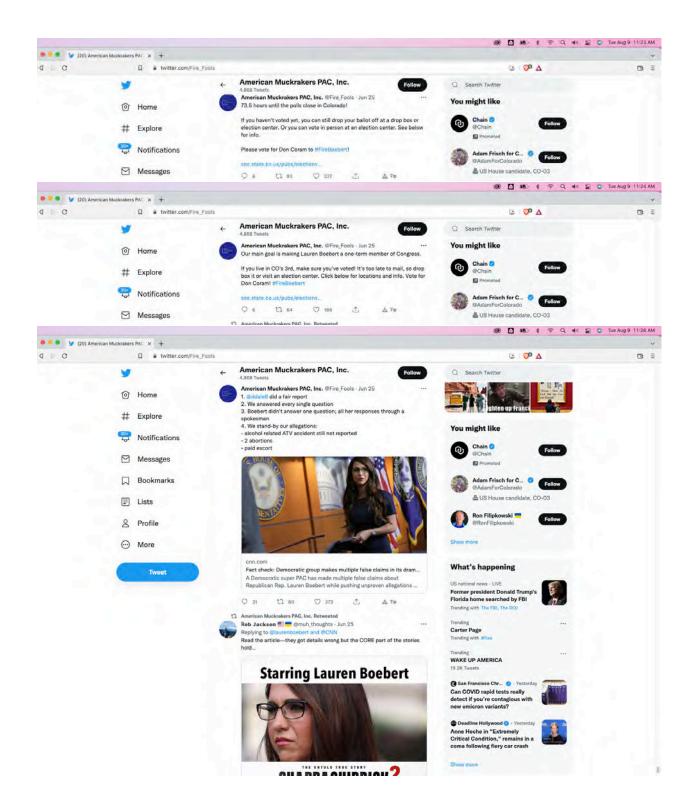


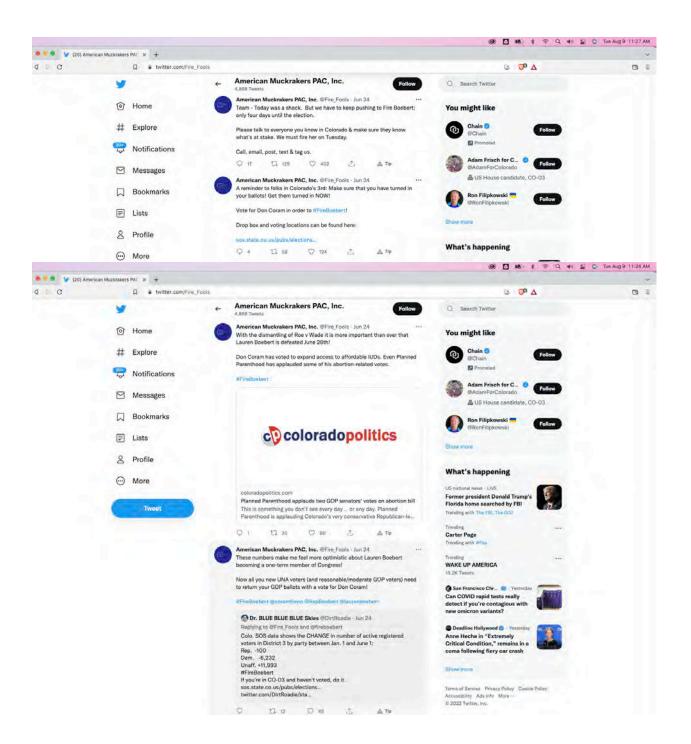


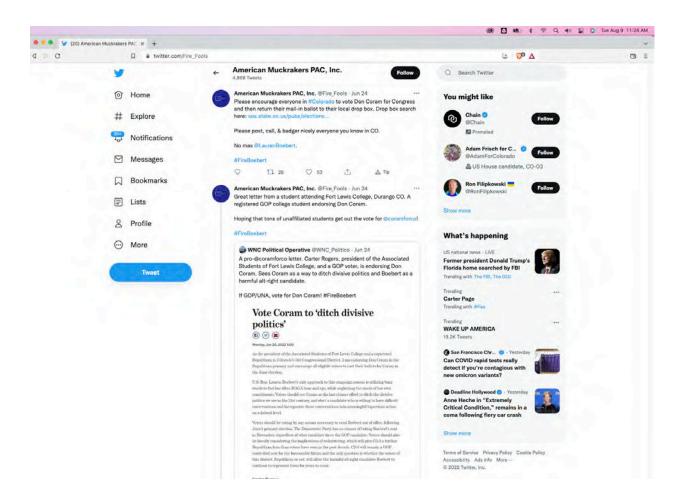


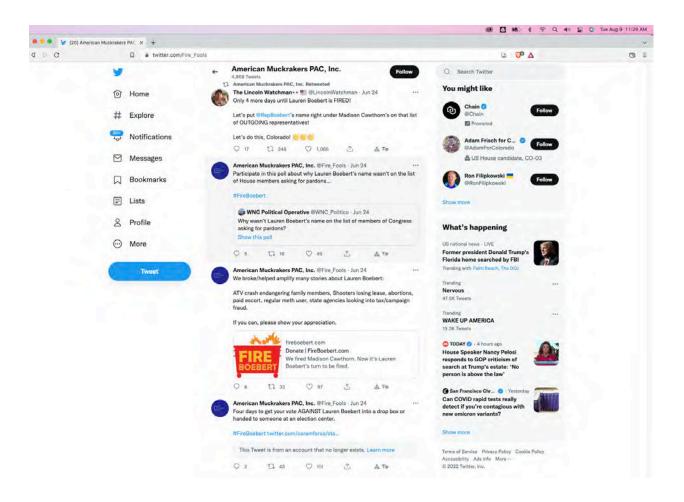


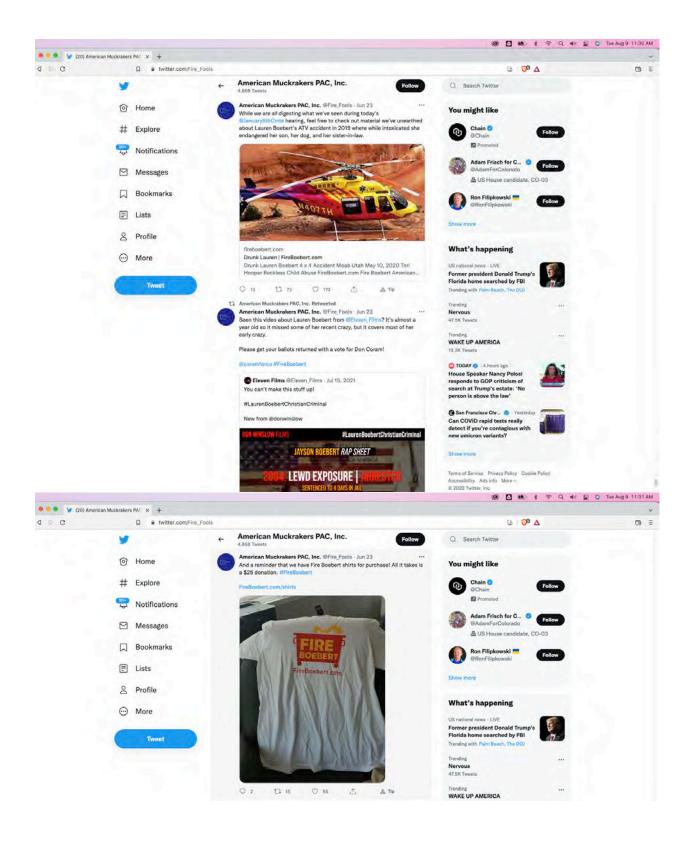


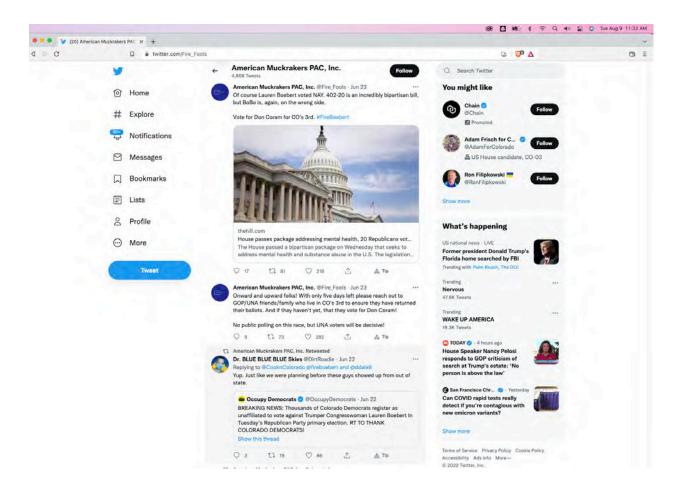


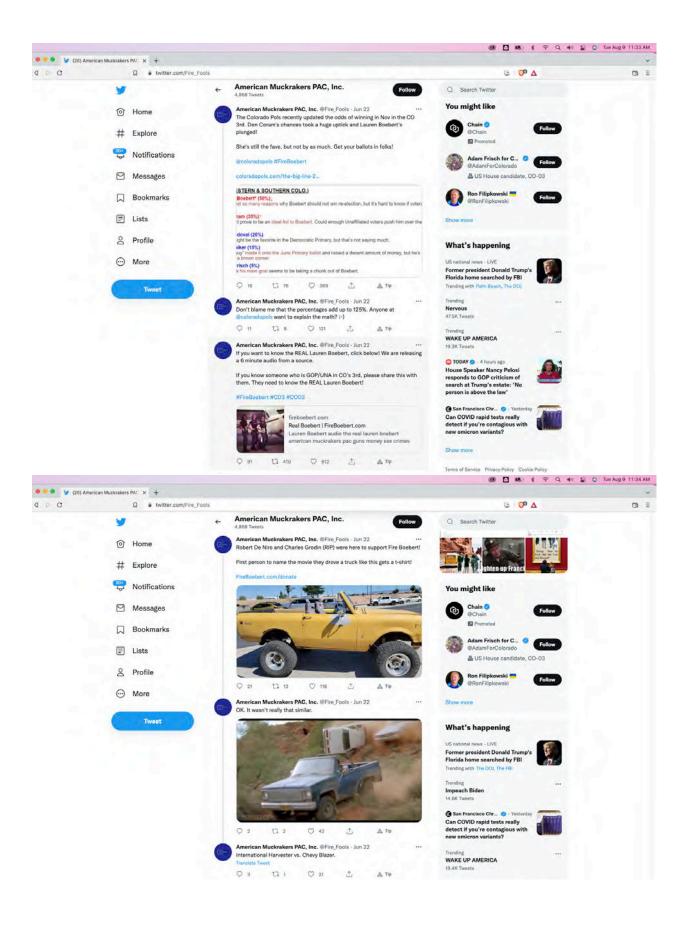


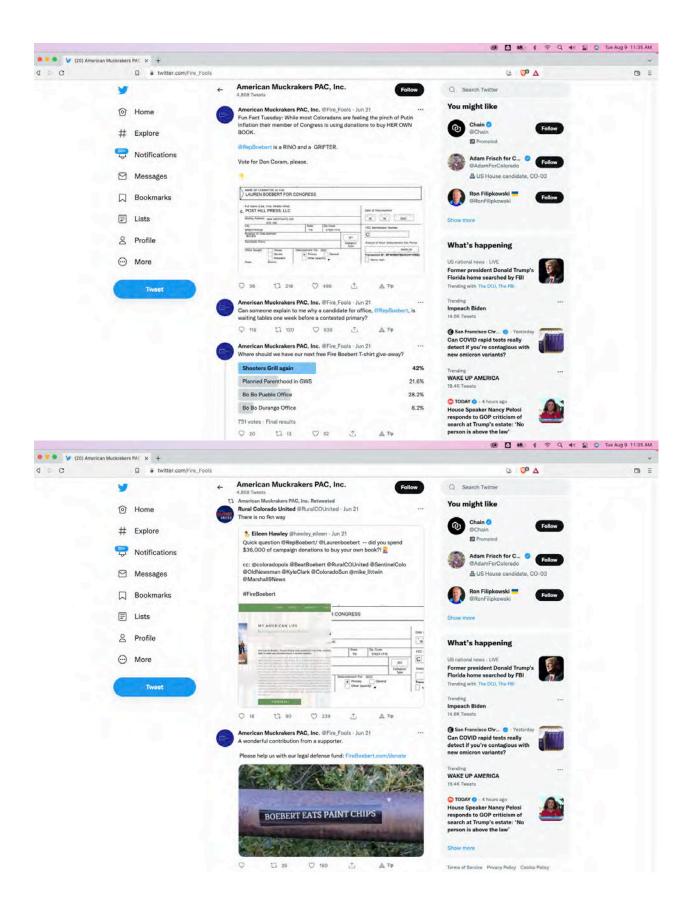


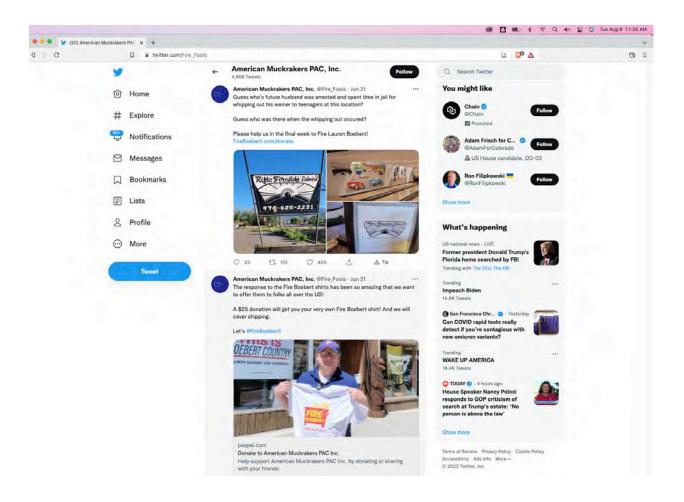


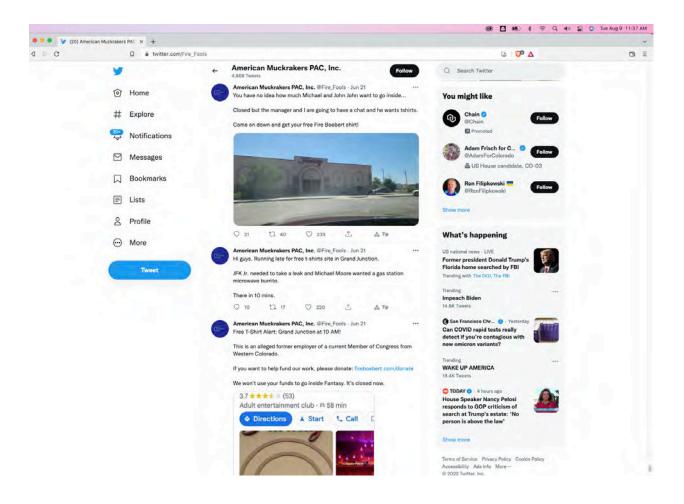


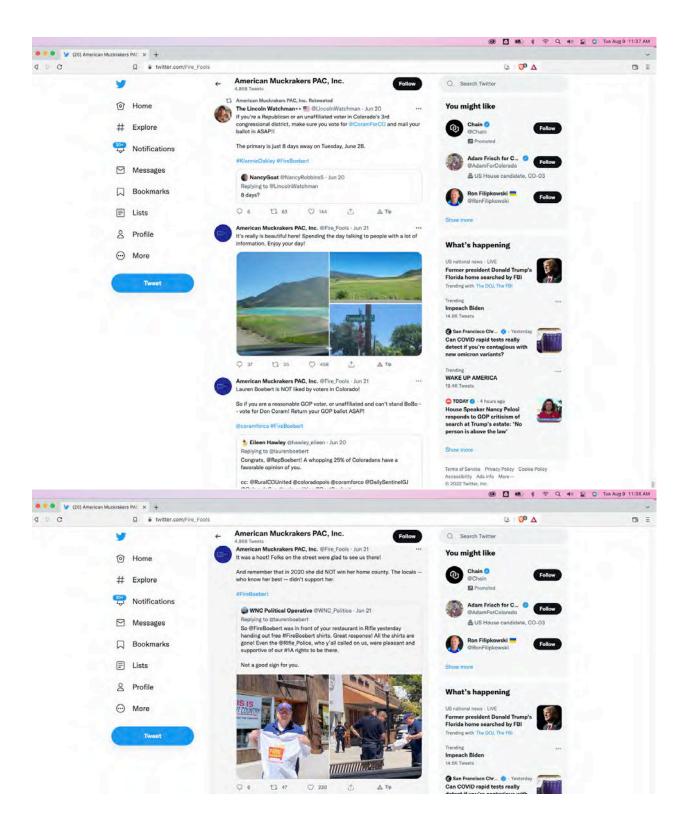


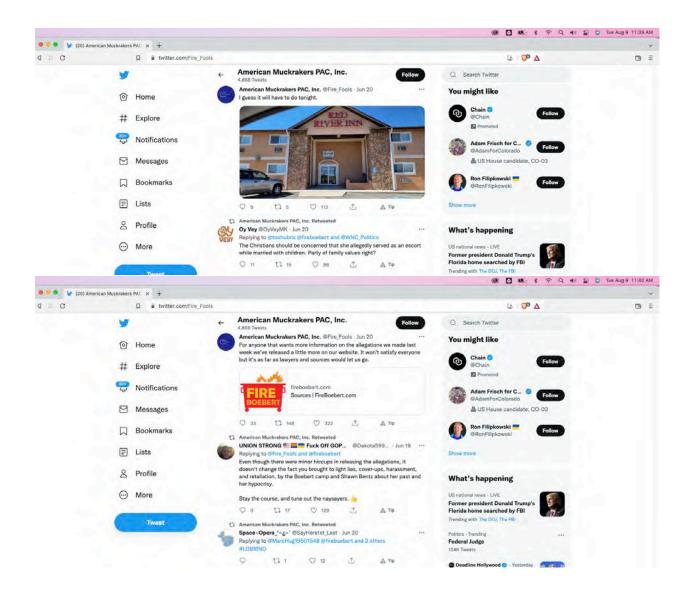


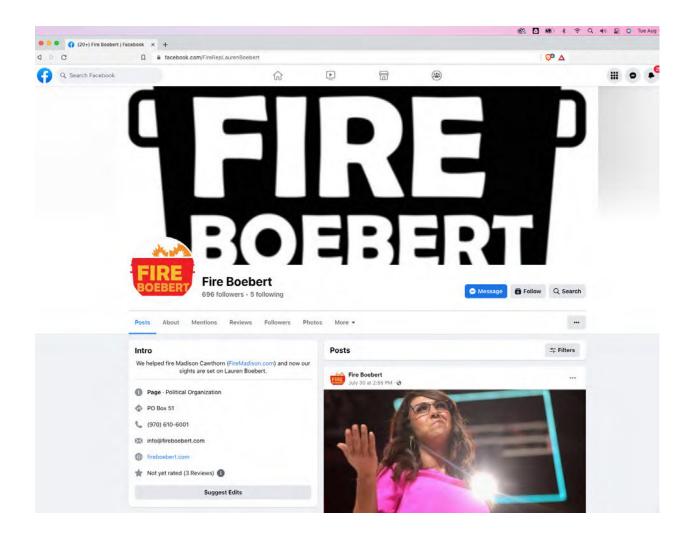


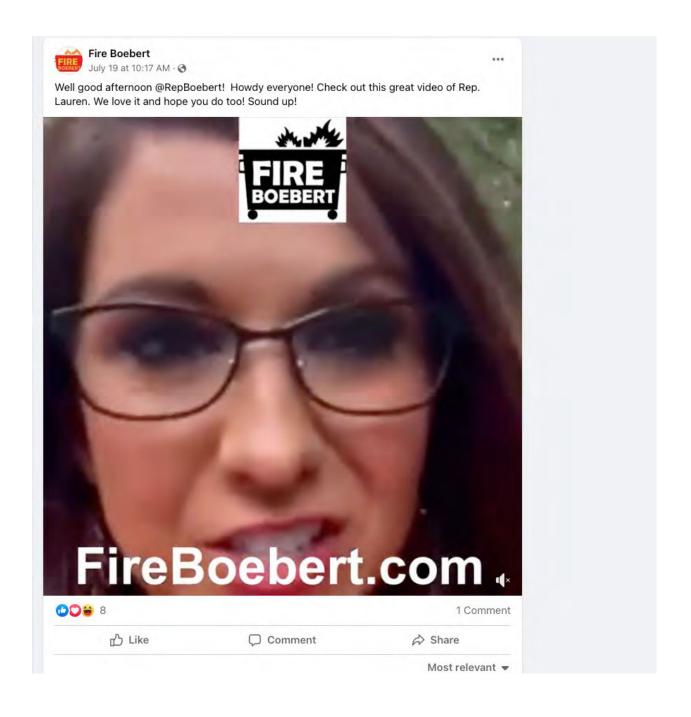


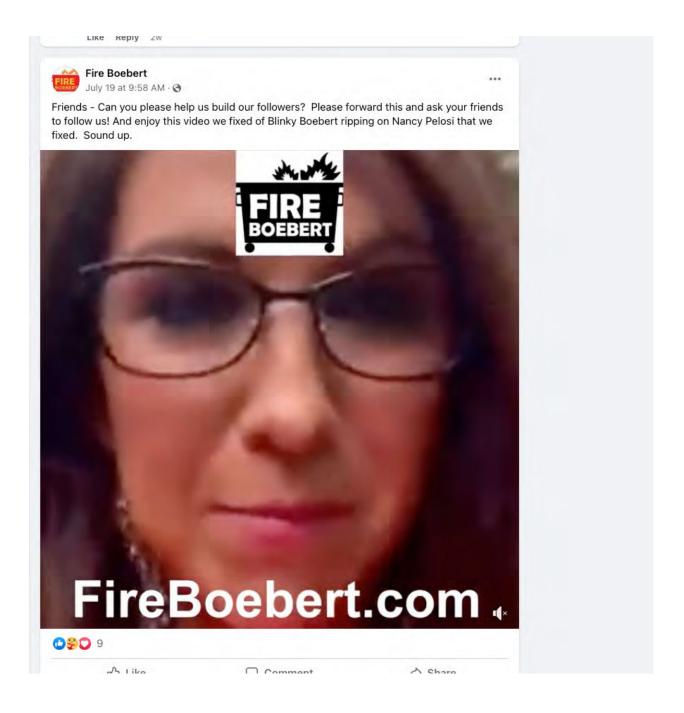


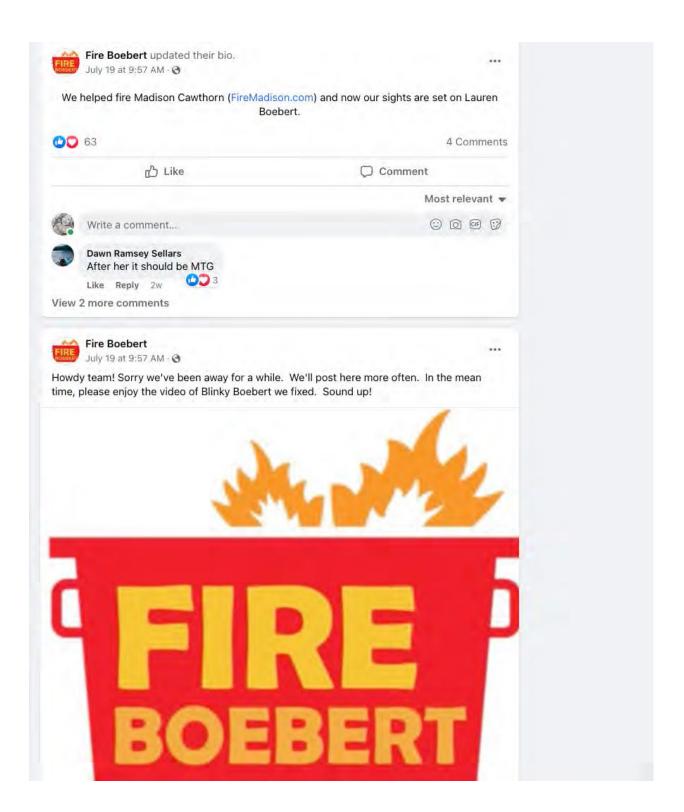


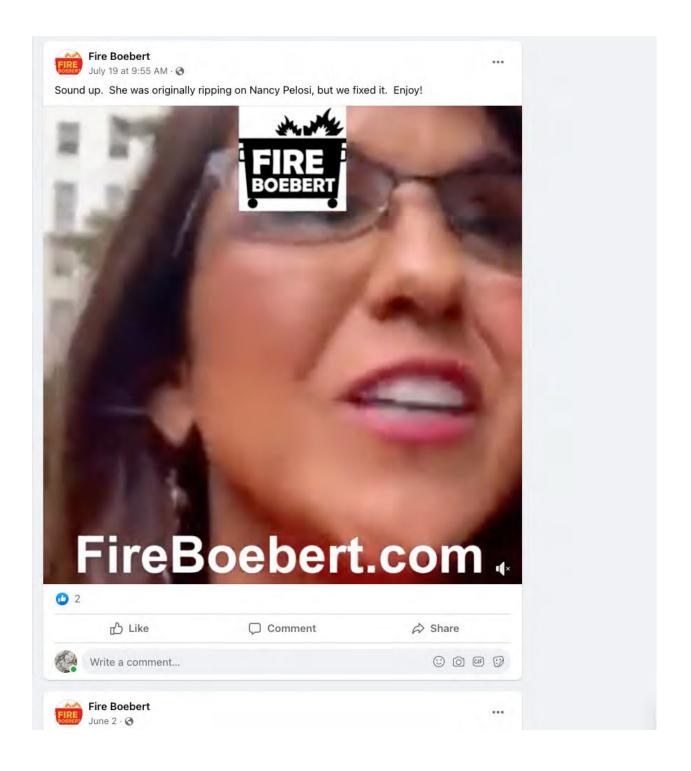












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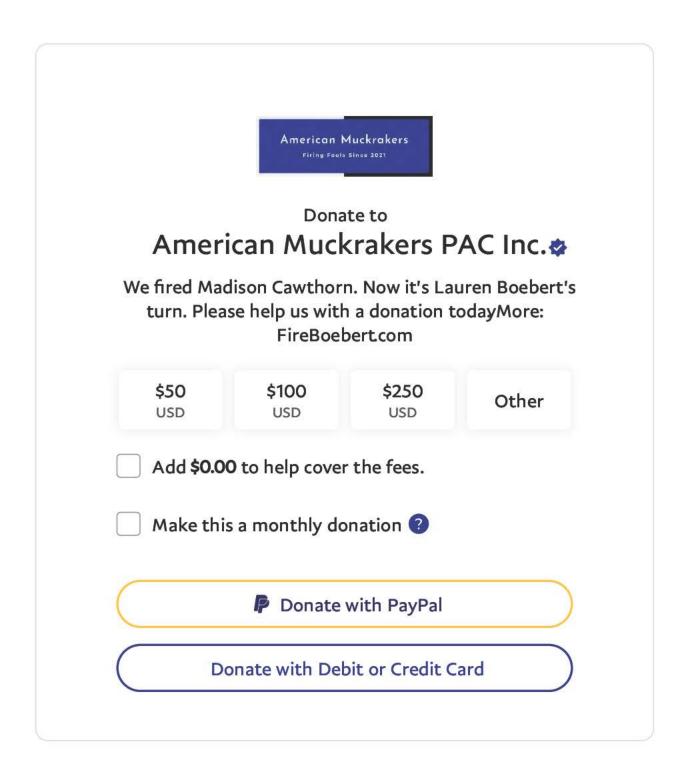
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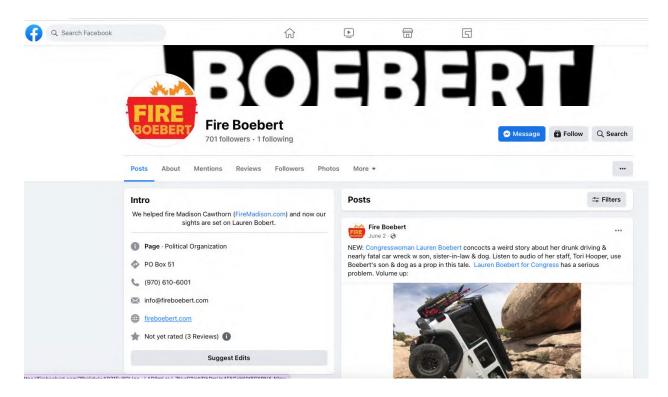
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