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OFFICE OF GENERAL COUNSEL

MUR 8076

9/27/2022

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

Subject: Lake for Congress Complaint, Candidate Jeannine Lake for Indiana District#5

I, Janay Barnes, co-owner of Bloossum, a digital marketing agency, was contracted by Jeannine Lee Lake (Candidate for Indiana House, District #5) on February 23rd, 2022 for services that include campaign management, strategy, digital marketing, fundraising, communications, and content creation.

Background information

In March, Jeannine Lake informed us that she owed the FEC a few thousand dollars for past violations (not filing a new statement of candidacy, several quarterly finance reports were missing for 2020 and 2021, and several requests for responses were ignored). At that time, Jencelyn King-Witzel (co-owner of Bloossum) talked to the FEC to figure out how to fix those violations.

Jencelyn called accountant Steven Burriss to assist with correcting the reports and getting back into compliance. Using information given to him by Jeannine Lake, he filed the missing reports.

On March 10th, we had to create a brand new campaign committee: Lake for Congress.

Also in March, Jeannine Lake set up a new campaign bank account, which we did not have access to. We set up an Omella fundraising account and were added to her ActBlue fundraising account. We were aware that she was also using CashApp and Venmo. Jencelyn informed her that any donations from CashApp and Venmo needed to go into her campaign account and not her personal one. Jeannine Lake said that she would make sure that happened.

Since we never had access to the campaign bank account and didn't know about all the ways money was raised, we couldn't figure out how much money was raised in total to see if what she reported to the FEC was true.

Around June, Jeannine Lake's father passed away, and she was also in the middle of a divorce, rendering her unable to pay for our services and other vendors' services. We paused our contract, with the intention of starting back up later in the year after our past due balance (\$4k+) was paid up.

FEC Violations

In September, Jeannine Lake informed us that she would like us to start our contract back up. She paid 2K of the 4K, and on September 6th we began working for her again.

On September 16th, Jeannine Lake told us that she had not received any ActBlue funds and contacted ActBlue about why she had not received them.

Jencelyn took a meeting with volunteers who asked for literature to pass out. Jeannine Lake asked Jencelyn to pay for it and said that she would reimburse us. Jencelyn said no, as there was still a balance owed to us.

Jeannine Lake then told Jencelyn that she would pay for the campaign literature. Jencelyn informed her that it was time-sensitive and asked when the volunteers could expect to have the literature.

Jeannine Lake told Jencelyn that " it's my money. I can do what I want with it. I'll get it when I get it. " Jencelyn reminded her that any money donated is for the campaign, not personal funds to be used. Jeannine Lake admitted to using personal funds and campaign funds interchangeably.

Jeannine Lake also said she used campaign funds for travel expenses that were not all campaign related.

At that time, Blossum understood that there was misappropriation of funds happening and did our best to stop it and correct errors.

As we still had no time frame for receiving the literature and were told it was because of ActBlue, Jencelyn checked the ActBlue account. Jencelyn was able to confirm that the checks had indeed been issued. Jeannine Lake had insisted that the campaign had little money, which was shocking to us as we knew how much was raised in ActBlue and Omella, and knew that cash, check, Venmo, and Cashapp donations have also been coming in (though we did not know the exact amount of these, Jeannine just admitted to receiving donations). When asked about the money raised, Jeannine Lake said that she had lots of campaign bills.

Jencelyn then checked the compliance report and noticed that thousands of donations were unreported, and the most recent report was highly inaccurate. The inaccuracies are as follows:

- The FEC report listed the amount raised, but that only accounts for ActBlue. Not all of the cash, checks, Venmo, and Cashapp donations were received.
- \$3,500 was reportedly spent at the dollar general store. This was untrue per Jeannine Lake's own statements.
- Cash and check donations from campaign fundraising events were noted.

Jencelyn talked to Jeannine Lake, informing her that the report had several inaccuracies. Jeannine Lake then blamed Steven (the accountant) for the errors, but also said that there were no errors. Jencelyn contacted Steven, who said that he had filed exactly the information given to him and that he still had all communications.

Bloossum was put in contact with volunteers, including Bob and Sara Draper and Rebekah Renner. Bob and Sara have hosted campaign events and told Bloossum that Jeannine raised thousands of dollars in checks and cash. Jeannine told Jencelyn that she only raised \$500 at those events.

We sternly informed Jeannine Lake that she needed to correct the FEC report in a phone call between Jeannine Lake, Janay, and Jencelyn. Jeannine Lake adamantly refused and forbade us to report our findings initially. She finally conceded, and we suggested that Bob Draper take over the campaign finances as treasurer. She agreed, and Bob was given access to the ActBlue and Omella fundraising accounts, where he saw many discrepancies in what was reported and spoke to both Jencelyn and Janay about them.

We asked Jeannine to add Bob to the campaign bank account, and she agreed, but a few days before the appointment to do so, she started to show reservations. On the day of, she removed Bob from treasurer duties.

Jencelyn, Janay, and Bob Draper (new treasurer) talked and unanimously agreed that Jeannine Lake was intentionally misappropriating funds.

As of this date, no one has access to the Lake for Congress bank account to see all transactions. Based on reports, conversations, and actions, we believe there has been an intentional misreporting of three things: not reporting all cash, check, and online donations; illegally reporting unauthored expenses as authorized; and mixing of personal and campaign funds.

We believe violations reg cfr103.2 depository, 11cfr 102.15 permeable funds, and 11cfr 104.5 filing dates were committed.

Bloossum is no longer working with Jeannine Lake’s campaign. Bob and Sara Draper, Rebekah Renner, and a few others (all volunteers) have dropped out of the campaign for reasons that include misappropriating funds, harassment by Jeannine Lake, intentional lying, etc.

Jeannine Lake has since been attempting to put the blame for FEC errors on Bloossum, going so far as to threaten a defamation/libel lawsuit.

Attached are supporting emails, texts, and documents.

Janay Barnes

Signed,

Janay Barnes , Co-owner Bloossum

Bloossum Address: 6435 W Jefferson BLVD, #256 Fort Wayne, IN 46804

Notary:

State of Florida
County of Brevard

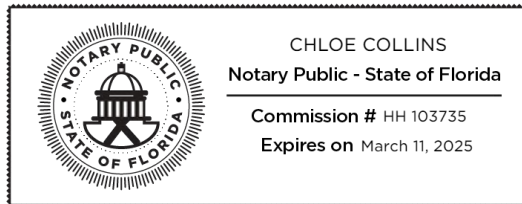
Signed and sworn to [or affirmed] before me on 4th October, 2022
by Janay Barnes (name(s) of individual(s) making statement).

Chloe Collins
(Notary’s official signature)

Chloe Collins

Notary Public
(Title of office)

03/11/2025
(Commission Expiration)



Notarized online using audio-video communication

< Jeannine Lee Lake

9:44 AM, Sep 27

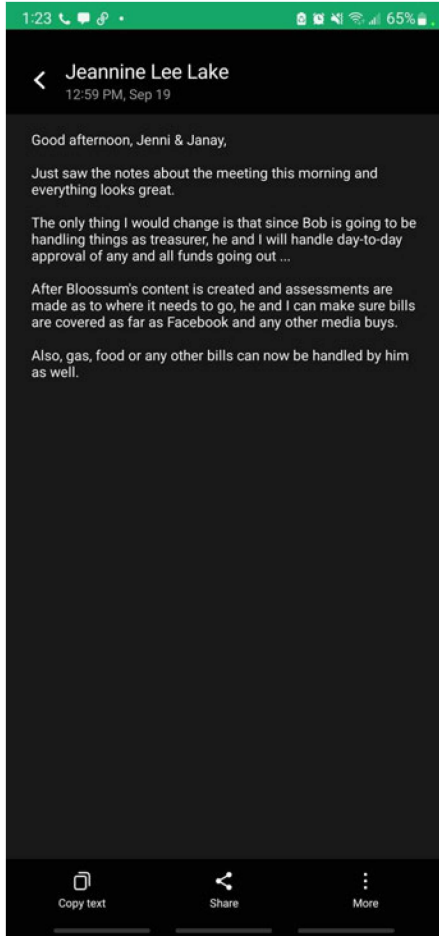
All is well.

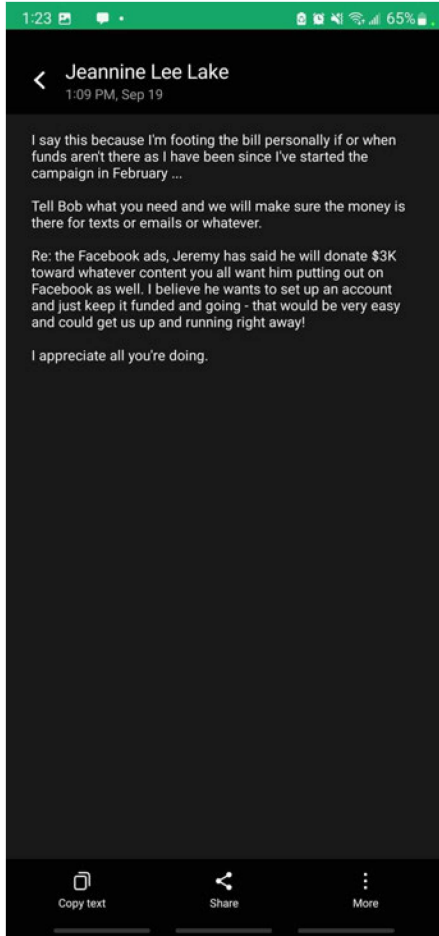
My accountant Michelle Harding is very familiar with FEC and is going to go ahead and review the last two reports tonight and make the needed changes.

Bob has never done any of this before and will be in a new field with all this and starting from scratch.

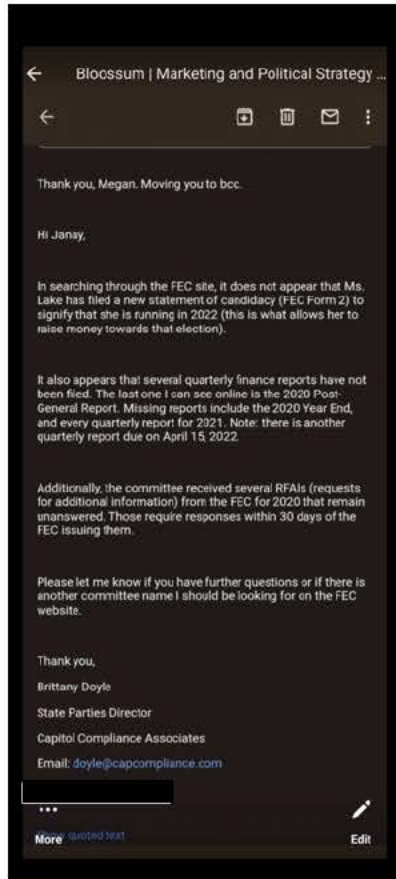
He doesn't deserve that and I feel bad putting him in that position.

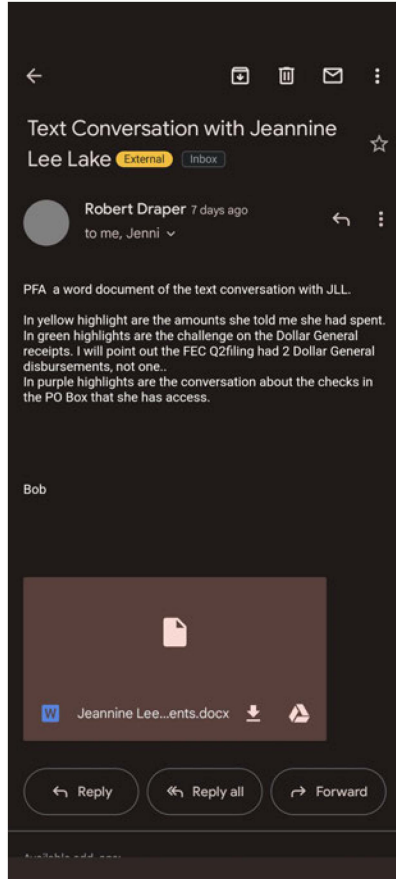
So from today, go ahead and do whatever you all need. We have enough to cover it all from what Janay sent.

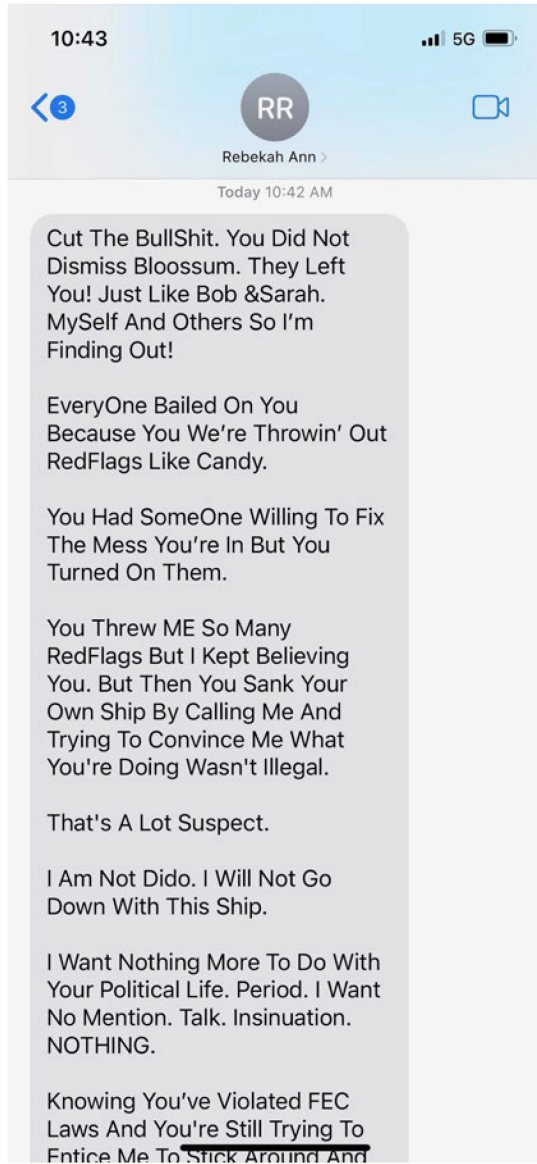















10:43 5G

Rebekah Ann >

RedFlags Like Candy.

You Had SomeOne Willing To Fix
The Mess You're In But You
Turned On Them.

You Threw ME So Many
RedFlags But I Kept Believing
You. But Then You Sank Your
Own Ship By Calling Me And
Trying To Convince Me What
You're Doing Wasn't Illegal.

That's A Lot Suspect.

I Am Not Dido. I Will Not Go
Down With This Ship.

I Want Nothing More To Do With
Your Political Life. Period. I Want
No Mention. Talk. Insinuation.
NOTHING.

Knowing You've Violated FEC
Laws And You're Still Trying To
Entice Me To Stick Around And
Help. But My Answer Was No
LastWeek. And It's Still The
Same.

Have A Blessed Day.