

Lisa J. Stevenson (lstevenson@fec.gov)
Deputy General Counsel – Law

Kevin Deeley (kdeeley@fec.gov)
Acting Associate General Counsel

Harry J. Summers (hsummers@fec.gov)
Assistant General Counsel

Kevin P. Hancock (khancock@fec.gov)
Attorney

FOR THE PLAINTIFF
FEDERAL ELECTION COMMISSION
999 E Street NW
Washington, DC 20463
(202) 694-1650

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION**

<hr/>)	
FEDERAL ELECTION COMMISSION,)	
)	
Plaintiff,)	Case No. 2:15CV00439 TC
)	
v.)	
)	
JEREMY JOHNSON,)	COMPLAINT
)	
Defendant.)	District Judge Tena Campbell
<hr/>)	

**PLAINTIFF FEDERAL ELECTION COMMISSION’S COMPLAINT FOR CIVIL
PENALTY, DECLARATORY, INJUNCTIVE, AND OTHER APPROPRIATE RELIEF**

Plaintiff Federal Election Commission (“Commission” or “FEC”), for its Complaint
against defendant Jeremy Johnson, alleges as follows:

INTRODUCTION

1. During the 2009-2010 campaign cycle for federal elections, Utah businessman
Jeremy Johnson knowingly and willfully made campaign contributions that violated the Federal

Election Campaign Act (“FECA” or “Act”) because they exceeded applicable limits and were made in the names of other persons.

2. In 2009 and 2010, FECA provided that no person could contribute in excess of \$2,400 per election to any federal candidate. During that time, however, Johnson contributed approximately \$100,000 to Mark Shurtleff’s United States Senate campaign, about \$50,000 to Mike Lee’s Senate campaign, and about \$20,000 to then-Senate Majority Leader Harry Reid’s Senate campaign. Johnson contributed at least a substantial part of these unlawful amounts with the hope that doing so would help protect Johnson’s business interests from federal prosecution.

3. To contribute these excessive amounts, Johnson unlawfully used “straw donors” — that is, contributors who gave funds ostensibly in their own names to the candidates but with the understanding that Johnson would either advance them the funds or reimburse them after the contributions were made. Johnson advanced or reimbursed approximately \$170,000 to the straw donors he recruited, who in turn gave funds to the Shurtleff, Lee, and Reid campaigns.

4. To remedy these violations, the Commission seeks a declaration that Johnson violated FECA’s limit on the amount a person may contribute per election to a federal candidate, *see* 52 U.S.C. § 30116(a)(1)(A), and FECA’s prohibition on any person contributing to a federal candidate in the name of another person, *see* 52 U.S.C. § 30122. The FEC also requests that the Court assess appropriate civil penalties against Johnson, permanently enjoin Johnson from committing future similar violations, and impose any other appropriate relief.

JURISDICTION AND VENUE

5. This action seeks civil penalties, a declaratory judgment, a permanent injunction, and other appropriate relief as authorized by the Federal Election Campaign Act, 52 U.S.C.

§§ 30101-46 (formerly 2 U.S.C. §§ 431-57).¹

6. This Court has jurisdiction over this suit pursuant to 28 U.S.C. § 1345, since it is an action brought by an agency of the United States expressly authorized to sue by an act of Congress. *See* 52 U.S.C. §§ 30107(a)(6), 30109(a)(6).

7. Venue is properly found in the United States District Court for the District of Utah pursuant to 28 U.S.C. § 1391(b) and 52 U.S.C. § 30109(a)(6)(A), because Johnson is found, resides, and transacts business in this District and because a substantial part of the acts or omissions giving rise to this suit occurred in this District.

THE PARTIES

8. Plaintiff FEC is the independent agency of the United States government with exclusive jurisdiction over the administration, interpretation, and civil enforcement of FECA. *See* 52 U.S.C. §§ 30106(b)(1), 30107(a), 30109. The Commission is authorized to investigate possible violations of the Act, *id.* § 30109(a)(1)-(2), and to file civil lawsuits in the United States district courts to enforce the Act, *id.* §§ 30107(e), 30109(a)(6).

9. Defendant Jeremy Johnson is a Utah resident who has conducted business in Utah. At all times relevant to this case, Johnson has owned or effectively controlled a company named Triple 7, an internet-marketing company named I Works, Inc. (“I Works”), and other businesses that processed transactions for online-poker companies.

RELEVANT STATUTORY AND REGULATORY PROVISIONS

10. During the 2009-2010 election cycle, FECA prohibited any person from contributing in excess of \$2,400 per election to any candidate for federal office and his or her

¹ On September 1, 2014, FECA’s provisions moved from Title 2 of the United States Code to newly created Title 52. The alleged violations and some of the administrative actions in this matter occurred prior to this change. A full transfer table is available at http://uscode.house.gov/editorialreclassification/t52/Reclassifications_Title_52.html.

authorized political committees. 52 U.S.C. § 30116(a)(1)(A) (formerly 2 U.S.C. § 441a(a)(1)(A)); Price Index Increases for Contribution and Expenditure Limitations, 74 Fed. Reg. 7435-02, 7437 (Feb. 17, 2009).

11. The Act further provides that “[n]o person shall make a contribution in the name of another person.” 52 U.S.C. § 30122 (formerly 2 U.S.C. § 441f). Additionally, no person may “[k]nowingly help or assist” any person contribute in the name of another. 11 C.F.R. § 110.4(b)(iii). A person has knowingly helped or assisted a person to contribute in the name of another when he or she has “initiate[d] or instigate[d] or ha[d] some significant participation in a plan or scheme to make a contribution in the name of another.” Prohibited Contributions, 54 Fed. Reg. 34,098, 34,105 (Aug. 17, 1989) (Explanation and Justification for 11 C.F.R. § 110.4).

12. The Act authorizes a United States district court to order a defendant who has knowingly and willfully contributed excessive amounts to a federal candidate in violation of 52 U.S.C. § 30116(a) to pay a civil penalty. That civil penalty may not exceed the greater of \$16,000 or 200% of the contributions involved in the violation. *See* 52 U.S.C. § 30109(a)(6)(C); 11 C.F.R. § 111.24(a)(2)(i) (2010).

13. The Act authorizes a United States district court to order a defendant who has knowingly and willfully made contributions in the name of another in violation of 52 U.S.C. § 30122 to pay a civil penalty. That civil penalty may not be less than 300% of the contributions involved in the violation and may not be more than the greater of \$60,000 or 1,000% of the contributions involved in the violation. 52 U.S.C. § 30109(a)(6)(C); 11 C.F.R. § 111.24(a)(2)(ii) (2010).

14. For a defendant who has violated FECA, but has not done so knowingly and willfully, the Act authorizes a United States district court to order that defendant to pay a civil penalty that does not exceed the greater of \$7,500 or an amount equal to any contribution involved in the violation. 52 U.S.C. § 30109(a)(6)(B); 11 C.F.R. § 111.24(a)(1) (2010).

15. In addition to imposing civil penalties, FECA authorizes a United States district court to “grant a permanent or temporary injunction, restraining order, or other order” against any defendant who has violated the Act. 52 U.S.C. § 30109(a)(6)(B).

FACTUAL BACKGROUND

16. During the 2009-2010 election cycle, Johnson knowingly and willfully used straw donors to contribute amounts in excess of FECA’s limits to three candidates for United States Senate at least in part in an attempt to further and protect his business interests.

Johnson’s Unlawful Contributions to the Shurtleff Campaign

17. In 2009, Johnson used the names of others to contribute approximately \$100,000 to Mark Shurtleff, who was then the Attorney General of Utah and a candidate in the June 2010 Republican primary election for United States Senate in Utah.

18. During the time relevant to this case, Johnson’s business interests included companies that made tens of millions of dollars by processing financial transactions for online-poker companies. Also during the time relevant to this case, Johnson was aware that the United States Attorney’s Office in the Southern District of New York had been filing lawsuits to seize the assets of online-poker companies, including those like Johnson’s companies that processed financial transactions relating to online poker games.

19. In 2009, Johnson met John Swallow, Utah's Chief Deputy Attorney General and a fundraiser for the Shurtleff campaign. Johnson agreed with Swallow to contribute amounts in excess of FECA's limits to the Shurtleff campaign.

20. Johnson offered to write a check for Shurtleff's campaign in an amount in excess of FECA's limits. Swallow told Johnson, however, about the statutory limit to the amount that any one person could legally contribute to a federal candidate. Swallow and Johnson then discussed the possibility of illicitly contributing additional amounts to Shurtleff's campaign by giving the funds to straw donors and arranging for those straw donors to pass on the funds to the Shurtleff campaign.

21. Johnson entered into arrangements or understandings with his straw donors that they would contribute funds to Shurtleff's campaign and that Johnson would supply them with the funds for those contributions.

22. Johnson's straw donors transmitted funds to Shurtleff's campaign that collectively amounted to approximately \$100,000. Johnson supplied his straw donors with those funds by either advancing them the money for the donations they would make to Shurtleff's campaign, or reimbursing them for the donations they had already made to Shurtleff's campaign.

23. Johnson made the contributions described in paragraphs 17-22 for the purpose of influencing the 2010 Republican primary election for United States Senate in Utah.

24. Johnson made the contributions described in paragraphs 17-22 voluntarily and with an awareness that they were unlawful.

Johnson's Unlawful Contributions to the Lee Campaign

25. In 2010, Johnson used the names of others to contribute approximately \$50,000 to Mike Lee, who was then a candidate in the June 2010 Republican primary election for United

States Senate in Utah, and who, after winning that election, became a candidate in the November 2010 general election for United States Senate in Utah.

26. In November 2009, Shurtleff ended his campaign, and in January 2010, Mike Lee entered the race for the Republican nomination for Senate in Utah, with Shurtleff's endorsement.

27. Johnson agreed with Swallow to contribute amounts in excess of FECA's limits to the Lee campaign, just as Johnson had for Shurtleff. Swallow and Johnson discussed how contributing to Lee's campaign would help protect and advance Johnson's business interests. In particular, Swallow told Johnson that if Johnson contributed to Lee, and if Lee won election to the Senate, Lee could then play a key role in the appointment of a United States Attorney in Utah who could protect Johnson's business interests from prosecution by other United States Attorneys.

28. For example, Johnson has reported that Swallow said to him: "[I]t is important that we raise this money and make Mike Lee our guy. . . . [H]e is going to be choosing the next U.S. Attorney and you gotta have him in your corner and you gotta have the U.S. Attorney in your corner especially while you are processing poker in this district."

29. Johnson entered into arrangements or understandings with his straw donors that they would contribute funds to Lee's campaign and that Johnson would supply them with the funds for those contributions. As Johnson has described, he would simply tell a potential straw donor: "Hey would you donate to Mike Lee? I'll get you the money."

30. Johnson's straw donors transmitted funds to Lee's campaign that collectively amounted to approximately \$50,000. Johnson supplied his straw donors with those funds by either advancing them the money for the contributions they would make to Lee's campaign or reimbursing them for the contributions they had already made to Lee's campaign.

31. Johnson made the contributions described in paragraphs 25-30 for the purpose of influencing the 2010 Republican primary election for United States Senate in Utah or the 2010 general election for United States Senate in Utah.

32. Johnson made the contributions described in paragraphs 25-30 voluntarily and with an awareness that they were unlawful.

Johnson's Unlawful Contributions to the Reid Campaign

33. In 2010, Johnson used the names of others to contribute approximately \$20,000 to then-Majority Leader Harry Reid, who was a candidate in the June 2010 primary election for the Democratic nomination for United States Senate in Nevada, and who, after winning that election, became a candidate in the November 2010 general election for United States Senate in Nevada.

34. In 2010, Johnson discussed with individuals in the online-poker gaming industry, including Ray Bitar, a principal of an internet-poker company called Full Tilt Poker, using straw donors to contribute unlawful amounts to federal candidates, including Majority Leader Reid, in an attempt to protect or further their business interests. Full Tilt Poker became a defendant in a civil asset forfeiture case brought by the United States Attorney's Office in the Southern District of New York in 2011. *See United States v. Pokerstars, et al.*, No. 11-cv-2564 (S.D.N.Y.).

35. During the time relevant to this case, Johnson owned an internet-marketing company named I Works. In 2010, the Federal Trade Commission was investigating complaints that I Works charged customers without authorization and engaged in other fraudulent trade practices. In the latter half of 2010, Johnson unsuccessfully sought Majority Leader Reid's assistance in halting the Federal Trade Commission's investigation. In December 2010, the Federal Trade Commission filed suit against Johnson and some of his associates and businesses, including I Works, in the United States District Court for the District of Nevada. *See FTC v.*

Johnson, et al., No. 2:10-cv-2203 (D. Nev.). Also as a result of I Works' allegedly unlawful business practices, Johnson was criminally indicted in June 2011 in the United States District Court for the District of Utah. *See United States v. Johnson et al.*, No. 2:11-cr-0501 (D. Utah).

36. Johnson entered into arrangements or understandings with his straw donors that they would contribute funds to Majority Leader Reid's campaign, and that Johnson would supply them with the funds for those contributions.

37. Johnson's straw donors transmitted funds to Majority Leader Reid's campaign that collectively amounted to approximately \$20,000. Johnson supplied his straw donors with those funds by either advancing them the money for the contributions they would make, or reimbursing them for the contributions they had already made, to the Reid campaign.

38. Johnson made the contributions described in paragraphs 33-37 for the purpose of influencing the 2010 Democratic primary election for United States Senate in Nevada or the 2010 general election for United States Senate in Nevada.

39. Johnson made the contributions described in paragraphs 33-37 voluntarily and with an awareness that they were unlawful.

Johnson's Straw Donors and Efforts to Conceal His Unlawful Contributions

40. The straw donors for Johnson's unlawful contributions to the Shurtleff, Lee, and Reid campaigns included Johnson's family members, employees, friends, and business associates.

41. In an attempt to conceal his illicit scheme, Johnson sometimes used cash to advance funds to his straw donors or to reimburse them for their donations to the candidates.

42. Also, Johnson and his straw donors at times used companies and accounts that they owned or effectively controlled to execute and attempt to conceal Johnson's illegal contributions.

43. For example, Johnson enlisted one of his business associates, Arvin Lee Black II, to act as a straw donor and to recruit other straw donors for Johnson's illicit contributions. On June 14, 2010, Triple 7, a company Johnson owned or effectively controlled, issued a check for \$14,400 to Sole Group LLC, a company owned or controlled by Black. The \$14,400 amount of that check was the exact amount needed to fund six contributions of \$2,400 each, which was FECA's applicable limit for contributions to federal candidates in the 2009-2010 election cycle.

44. The same day that Triple 7 issued its \$14,400 check to Sole Group LLC, Sole Group LLC issued six checks for \$2,400 each (totaling \$14,400) made payable sequentially to Arvin Lee Black II, Atia Black, Matthew Black, Savannah Jones, Kyle Boyer, and Tiffany Boyer. Each of those six individuals attempted to make contributions in the amount of \$2,400 each to the Lee campaign in June 2010. Some of their checks bounced, but at least four of the contributions, for a total of \$9,600, were successfully made.

45. Swallow informed Johnson about the four bounced contribution checks, and Johnson responded that he would "fix" the problem immediately. The following day, three of the four contributors whose contributions had bounced issued new contribution checks to the Lee campaign.

ADMINISTRATIVE PROCEEDINGS

46. On June 30, 2014, the Commission received an administrative complaint alleging, among other things, that Johnson used the names of others to contribute \$50,000 to the Lee Senate campaign; that Black was one of Johnson's straw donors; and that Swallow had

previously discussed with Johnson using the names of others to contribute to Shurtleff's 2010 Senate campaign.

47. On July 3, 2014, the Commission notified Johnson that the administrative complaint had been filed. The Commission provided Johnson with a copy of the administrative complaint and an opportunity to respond. *See* 52 U.S.C. § 30109(a)(1). Johnson did not submit a written response to the administrative complaint.

48. After reviewing the then-available information, on November 18, 2014, the Commission, by an affirmative vote of at least four of its members, found reason to believe that Johnson had violated 52 U.S.C. §§ 30116(a)(1)(A) and 30122 by making excessive contributions in the names of others to the Lee campaign. The Commission notified Johnson of its reason-to-believe findings in a letter dated December 22, 2014. *See* 52 U.S.C. § 30109(a)(2).

49. After conducting an investigation, the Commission's Office of the General Counsel notified Johnson by letter dated March 11, 2015 that it was prepared to recommend that the Commission find probable cause to believe that Johnson knowingly and willfully violated 52 U.S.C. §§ 30116(a)(1)(A) and 30122. The Office of the General Counsel also provided Johnson with a brief stating its position on the legal and factual issues of the matter. *See* 52 U.S.C. § 30109(a)(3). Johnson did not submit a reply.

50. After reviewing the information then available, on April 16, 2015, the Commission, by an affirmative vote of at least four of its members, found probable cause to believe that Johnson knowingly and willfully violated 52 U.S.C. §§ 30116(a)(1)(A) and 30122 by making excessive contributions in the names of others to federal campaigns. *See* 52 U.S.C. § 30109(a)(3).

51. The Commission notified Johnson of its probable cause findings against him by

letter dated April 20, 2015. The Commission then endeavored to correct Johnson's violations through informal methods of conference, conciliation, and persuasion, for a period of not less than 30 days. *See* 52 U.S.C. § 30109(a)(4)(A).

52. On May 15, 2015, Johnson signed an agreement tolling the statute of limitations for 30 days.

53. Unable to secure an acceptable conciliation agreement, on June 15, 2015, the Commission, by an affirmative vote of at least four of its members, authorized filing this suit against Johnson. *See* 52 U.S.C. § 30109(a)(6).

54. The Commission has satisfied all of the jurisdictional requirements in FECA that are prerequisites to filing this action.

FIRST CAUSE OF ACTION

55. Paragraphs 1 through 54, inclusive, are incorporated herein by reference.

56. Defendant Jeremy Johnson knowingly and willfully violated 52 U.S.C. § 30116(a)(1)(A) by contributing approximately \$100,000 to Mark Shurtleff's United States Senate campaign, about \$50,000 to Mike Lee's Senate campaign, and about \$20,000 to Majority Leader Harry Reid's Senate campaign during the 2009-2010 election cycle.

SECOND CAUSE OF ACTION

57. Paragraphs 1 through 54, inclusive, are incorporated herein by reference.

58. Defendant Jeremy Johnson knowingly and willfully violated 52 U.S.C. § 30122 by using straw donors to contribute approximately \$100,000 to Mark Shurtleff's United States Senate campaign, about \$50,000 to Mike Lee's Senate campaign, and about \$20,000 to Majority Leader Harry Reid's Senate campaign during the 2009-2010 election cycle.

PRAYER FOR RELIEF

WHEREFORE, plaintiff Federal Election Commission prays that this Court:

- A. Declare that defendant Jeremy Johnson knowingly and willfully violated 52 U.S.C. § 30116(a)(1)(A) by making contributions in excess of the lawful limits.
- B. Declare that defendant Jeremy Johnson knowingly and willfully violated 52 U.S.C. § 30122 by contributing money in the names of others.
- C. Permanently enjoin defendant Jeremy Johnson from contributing amounts in excess of FECA's limits to federal candidates.
- D. Permanently enjoin defendant Jeremy Johnson from contributing money in the names of others to federal candidates.
- E. Assess an appropriate civil penalty against defendant Jeremy Johnson:
 1. for each knowing and willful violation of 52 U.S.C. § 30116(a), a civil penalty that is not more than the greater of \$16,000 or 200% of the amount involved in the violation, *see* 52 U.S.C. § 30109(a)(6)(C), 11 C.F.R. § 111.24(a)(2)(i) (2010);
 2. for each knowing and willful violation of 52 U.S.C. § 30122, a civil penalty that is not less than 300% of the amount involved in the violation and is not more than the greater of \$60,000 or 1,000% of the amount involved in the violation, *see* 52 U.S.C. § 30109(a)(6)(C), 11 C.F.R. § 111.24(a)(2)(ii) (2010); and
 3. for any violation that the Court may find to be not knowing and willful, a civil penalty not to exceed the greater of \$7,500 or the amount of any contributions or expenditures involved, *see* 52 U.S.C. § 30109(a)(6)(B), 11 C.F.R. § 111.24(a)(1) (2010).
- F. Award plaintiff Federal Election Commission its costs in this action; and

G. Grant plaintiff Federal Election Commission such other relief as may be appropriate.

Respectfully submitted,

/s/ Lisa J. Stevenson

(Signed by Filing Attorney with permission of Plaintiff Attorney)

Lisa J. Stevenson (lstevenson@fec.gov)

Deputy General Counsel – Law

/s/ Kevin Deeley

(Signed by Filing Attorney with permission of Plaintiff Attorney)

Kevin Deeley (kdeeley@fec.gov)

Acting Associate General Counsel

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Harry J. Summers (hsummers@fec.gov)

Assistant General Counsel

/s/ Kevin P. Hancock

Kevin P. Hancock (khancock@fec.gov)

Attorney

June 19, 2015

FOR THE PLAINTIFF
FEDERAL ELECTION COMMISSION
999 E Street, NW
Washington, DC 20463
(202) 694-1650

JS 44 (Rev. 12/12)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

<p>I. (a) PLAINTIFFS Federal Election Commission</p> <p>(b) County of Residence of First Listed Plaintiff _____ <i>(EXCEPT IN U.S. PLAINTIFF CASES)</i></p> <p>(c) Attorneys <i>(Firm Name, Address, and Telephone Number)</i> See Attachment</p>	<p>DEFENDANTS Johnson, Jeremy</p> <p>County of Residence of First Listed Defendant <u>Washington County</u> <i>(IN U.S. PLAINTIFF CASES ONLY)</i></p> <p>NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.</p> <p>Attorneys <i>(If Known)</i></p>
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<p>II. BASIS OF JURISDICTION <i>(Place an "X" in One Box Only)</i></p> <p><input checked="" type="checkbox"/> 1 U.S. Government Plaintiff</p> <p><input type="checkbox"/> 2 U.S. Government Defendant</p> <p><input type="checkbox"/> 3 Federal Question <i>(U.S. Government Not a Party)</i></p> <p><input type="checkbox"/> 4 Diversity <i>(Indicate Citizenship of Parties in Item III)</i></p>	<p>III. CITIZENSHIP OF PRINCIPAL PARTIES <i>(Place an "X" in One Box for Plaintiff and One Box for Defendant)</i></p> <table style="width:100%; border-collapse: collapse;"> <tr> <td style="width:33%;"></td> <td style="width:33%; text-align: center;">PTF</td> <td style="width:33%; text-align: center;">DEF</td> </tr> <tr> <td>Citizen of This State</td> <td style="text-align: center;"><input type="checkbox"/> 1</td> <td style="text-align: center;"><input type="checkbox"/> 1</td> </tr> <tr> <td>Citizen of Another State</td> <td style="text-align: center;"><input type="checkbox"/> 2</td> <td style="text-align: center;"><input type="checkbox"/> 2</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td style="text-align: center;"><input type="checkbox"/> 3</td> <td style="text-align: center;"><input type="checkbox"/> 3</td> </tr> <tr> <td>Incorporated or Principal Place of Business In This State</td> <td style="text-align: center;"><input type="checkbox"/> 4</td> <td style="text-align: center;"><input type="checkbox"/> 4</td> </tr> <tr> <td>Incorporated and Principal Place of Business In Another State</td> <td style="text-align: center;"><input type="checkbox"/> 5</td> <td style="text-align: center;"><input type="checkbox"/> 5</td> </tr> <tr> <td>Foreign Nation</td> <td style="text-align: center;"><input type="checkbox"/> 6</td> <td style="text-align: center;"><input type="checkbox"/> 6</td> </tr> </table>		PTF	DEF	Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4	<input type="checkbox"/> 4	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6
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IV. NATURE OF SUIT *(Place an "X" in One Box Only)*

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES		
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<p>PERSONAL INJURY</p> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<p>PERSONAL INJURY</p> <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <p>PERSONAL PROPERTY</p> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input checked="" type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes	
<p>REAL PROPERTY</p> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<p>CIVIL RIGHTS</p> <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	<p>PRISONER PETITIONS</p> <p>Habeas Corpus:</p> <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <p>Other:</p> <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement	<p>LABOR</p> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act	<p>PROPERTY RIGHTS</p> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark	<p>SOCIAL SECURITY</p> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))	<p>FEDERAL TAX SUITS</p> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609

V. ORIGIN *(Place an "X" in One Box Only)*

1 Original Proceeding 2 Removed from State Court 3 Remanded from Appellate Court 4 Reinstated or Reopened 5 Transferred from Another District *(specify)* 6 Multidistrict Litigation

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing *(Do not cite jurisdictional statutes unless diversity):*
 52 U.S.C. 30116(a)(1)(A), 30122 Federal Election Campaign Act.

Brief description of cause:
 Illegal contributions in the names of others to federal candidates

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. **DEMAND \$** _____ CHECK YES only if demanded in complaint:
JURY DEMAND: Yes No

VIII. RELATED CASE(S) IF ANY *(See instructions):* JUDGE _____ DOCKET NUMBER _____

DATE 6/16/15 SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

Attorneys for Plaintiff Federal Election Commission

FEDERAL ELECTION COMMISSION

999 E Street, N.W.

Washington, DC 20463

(202) 694-1650

Lisa J. Stevenson

Deputy General Counsel – Law

lstevenson@fec.gov

Kevin Deeley

Acting Associate General Counsel

kdeeley@fec.gov

Harry J. Summers

Assistant General Counsel

hsummers@fec.gov

Kevin P. Hancock

Attorney

khancock@fec.gov