

BEFORE THE FEDERAL ELECTION COMMISSION

Tiffany Muller
End Citizens United
PO Box 66005
Washington, DC 20035

Complainant,

v.

JILL STEIN
17 Trotting Horse Drive
Lexington, Massachusetts 02421

JILL STEIN FOR PRESIDENT 2024
Christopher Cayer
PO Box 704
Stratton, Maine 04982

THE SYNAPSE GROUP
Jefferson Thomas
225 High Ridge Road, East Building
Stamford, CT 06905

IMPACT ADVOCACY GROUP LLC
Meghan Cox
Matthew Cohen
Samuel F. Wright
733 10th Street, NW
Suite 900
Washington, D.C. 20001

Respondents.

COMPLAINT

This Complaint is filed with the Federal Election Commission (“FEC” or the “Commission”) pursuant to 52 U.S.C. § 30109(a)(1) against Dr. Jill Stein (“Dr. Stein”), Jill Stein for President 2024, and Christopher Cayer in his official capacity as treasurer (together, “Stein Campaign”); Jefferson Thomas (“Thomas”) and The Synapse Group (together, “Synapse”);

Meghan Cox (“Cox”), Samuel F. Wright (“Wright”), Matthew Cohen (“Cohen”), and Impact Advocacy Group LLC (together, “IAG”); and currently yet unknown additional respondents (collectively, “Respondents”) for making, accepting, and/or facilitating excessive and illegal in-kind contributions and excessive and illegal coordinated expenditures in violation of the Federal Election Campaign Act of 1971, as amended (“FECA” or the “Act”).

Under FECA, candidates must finance their own campaigns for office, and individuals, corporations, and other groups may not provide direct monetary or in-kind assistance to Federal candidates outside the contribution limits and source prohibitions of the Act.¹ This Complaint provides conclusive evidence that Republican signature gathering firms—not being paid by the Stein Campaign—illegally colluded with the Stein Campaign and collected the necessary signatures to get her on the ballot in New Hampshire. This is true at least in New Hampshire, but continuing investigation is likely to uncover evidence that Dr. Stein, the Green Party, and the Stein Campaign welcomed Republican assistance to obtain ballot access across the country, despite being on opposite ends of the political spectrum and in full knowledge that Republicans were providing such assistance with the goal of electing Donald Trump. Countless news articles have detailed Republican operatives’ attempts to champion third-party candidates such as Dr. Stein and Dr. Cornel West in hopes they will siphon votes from Democratic Nominee Vice President Kamala Harris in November.² This point was driven home by Republican Nominee and former President Donald Trump when he praised Dr. Stein in a speech saying “[...]Jill Stein, I

¹52 U.S.C. § 30116; 52 U.S.C. § 30118.

²*How Republicans and Democrats are Boosting Third-Party ‘Spoiler’ Candidates—As Trump Lawyer Represents Jill Stein*, Alison Durkee, Forbes, <https://www.forbes.com/sites/alisondurkee/2024/09/18/how-republicans-and-democrats-are-boosting-third-party-spoiler-candidates-as-trump-lawyer-represents-jill-stein/> (last visited Sept. 18, 2024); *Republican Allies Boost Longshot Candidate Jill Stein as Democrats Try to Remove Her from Ballots in Battleground States*, Allison Novelo, CBS, <https://www.cbsnews.com/news/republican-allies-jill-stein-green-party-democrats-ballots-battleground-states/> (last visited Sept. 18, 2024); *GOP Network Props Up Liberal Third-Party Candidates in Battleground States*, Brian Slodysko, Associated Press, <https://why.org/articles/presidential-elections-2024-third-party-candidates-republicans/> (last visited Sept. 18, 2024).

like her very much. You know why? She takes 100 percent from them,” referring to Vice President Harris.³

Beyond the unquestionable evidence of coordinated signature gathering activity, given the unique and complicated nature of petition gathering for Presidential candidates, it is virtually impossible for these activities to be taking place without direct coordination between the Stein Campaign and the Respondents. Indeed, the Respondents would not know how many signatures the Campaign had or still needed without information from the Stein Campaign.

Petition submission rules in New Hampshire make this point even more salient. Petitioners for ballot access in New Hampshire are required to submit at the municipal level, rather than at the county or state level, meaning that these Republican operatives and the Stein Campaign would have had to know which of the 234 municipalities were going to be covered by the operatives and which of the remaining smaller towns could be covered by the Stein Campaign. Documentary evidence to date shows that such coordination with the Stein Campaign has occurred with no attendant reporting of payments for these activities. However, because these are paid petition gathering companies and not charitable entities, someone was paying. It just was not the Stein Campaign. This nondisclosure gets to the core of the corruption interests that undergird FECA.

Based upon the following facts, there is strong reason to believe the Stein Campaign, other Respondents named in this Complaint, and future Respondents yet unknown have grievously violated the Act by making, accepting, and/or facilitating excessive illegal in-kind contributions and excessive illegal coordinated expenditures. The Commission must investigate the extent of the FECA violations involved and levy the appropriate penalties on Respondents.

³*Donald Trump Reveals 'Favorite' Opponents*, Newsweek, <https://www.newsweek.com/donald-trump-reveals-favorite-opponents-1916249> (last visited Sept. 18, 2024).

FACTUAL BACKGROUND

Dr. Stein is a Green Party candidate for the office of President of the United States. Jill Stein for President 2024 is the authorized principal campaign committee for Dr. Stein registered with the FEC, and Christopher Cayer is the treasurer for the Stein Campaign. Dr. Stein recently attempted to gain ballot access in New Hampshire by nominating petition. Nominating petitions were submitted in cities and towns across New Hampshire, including six (6) of the largest by population: Derry, Hudson, Manchester, Merrimack, Nashua, and Rochester. Each location has a receipt, office log, or cover sheet showing who submitted the petitions, the date of the submission, and in most cases the signature of the submitter.

I. The Synapse Group

Jefferson Thomas is the President of The Synapse Group, a company that “partners with individuals, campaigns, and corporations[...]to provide[...]solutions to challenges presented in the government, public affairs, and campaign spaces.”⁴ Most notably, Synapse provides petition gathering services to help candidates get on the ballot.

Thomas, specifically, has been working through Synapse to bolster support for the Stein Campaign in New Hampshire, paying individuals to collect, organize, and submit nominating petitions supporting Dr. Stein’s Green Party bid to get on the ballot for President of the United States. Prior to his support scheme for Dr. Stein, Thomas served as Republican Joe O’Dea’s Senior Political Advisor for his 2022 US Senate campaign, as a consultant for Missouri Republican State Senator Lincoln Hough’s PAC, LincolnPAC, and as a Strategic Advisor to the American Freedom Coalition—a 501(c)(4) entity dedicated to supporting conservative

⁴The Synapse Group, <https://www.thesynapsegroup.org/> (last visited Sept. 18, 2024).

Congressmembers.⁵ Thomas has also worked for Doug Burgum, the Republican Governor of North Dakota, and Blake Masters, a Republican House of Representatives candidate in Arizona.⁶ Synapse additionally received \$935,000 in August 2024 for “Canvassing/Field Operations” work for America PAC⁷—an organization dedicated to boosting Republican Nominee and former President Donald Trump.⁸

On August 5, 2024, Thomas submitted 28 petitions to the City Clerk’s office in Rochester, according to a copy of the office log, which listed Thomas’s name and Synapse email address as the contact person for the forms.⁹ (Nearly two-thirds of these petitions were determined to be invalid by the town, according to the log.) That same day, Thomas submitted 242 petition signatures in Hudson and an additional 326 petition signatures in Derry, according to a cover sheet he submitted and signed with the Hudson petitions and a receipt of nominating petitions signed by the Derry Town Clerk.¹⁰ In Nashua, Thomas signed a cover sheet for 1,606 petitions that were ultimately delivered to the Nashua City Clerk’s Office by Matt Cohen, an employee of Impact Advocacy Group, according to the nomination papers receipt.¹¹ The following day, Thomas submitted 257 signatures to the town of Merrimack, again leaving a signed cover sheet. This sheet was later signed and dated by Samuel F. Wright, another

⁵The Synapse Group, <https://www.thesynapsegroup.org/> (last visited Sept. 18, 2024); The American Freedom Coalition, <https://americanfreedomcoalition.org/> (last visited Sept. 18, 2024).

⁶Doug Burgum for America Inc.: Year End Report, FEC (filed Jan. 31, 2024), available at <https://docquery.fec.gov/cgi-bin/fecimg/?202401319601250748>; Blake Masters for Congress: First Quarterly Report, FEC (Rev. May 3, 2024), available at <https://docquery.fec.gov/cgi-bin/fecimg/?202405039645465689>.

⁷America PAC: 24-Hour FEC Report, FEC (filed Aug. 14, 2024), available at <https://docquery.fec.gov/cgi-bin/fecimg/?202408149666193039>.

⁸*A Longtime GOP Operative Helped the Green Party’s Jill Stein Get on the N.H. Ballot. Democrats Smell Mischief*, Emma Platoff, The Boston Globe, <https://www.bostonglobe.com/2024/09/10/metro/jill-stein-new-hampshire-ballot-republican-help/?event=event12> (last visited Sept. 18, 2024).

⁹See Exhibit A

¹⁰See Exhibit A

¹¹See Exhibit A

employee of Impact Advocacy Group, suggesting that Wright picked up the petitions following the town's certification.¹²

II. Impact Advocacy Group

Impact Advocacy Group LLC (“IAG”), a company dedicated to “develop[ing] and implement[ing] national public engagement campaigns designed to support traditional lobbying efforts,”¹³ is led by its Chief Executive Officer Meghan Cox, who has worked with several GOP candidates including Senators John McCain and Dan Sullivan, and former President George W. Bush.¹⁴ Samuel F. Wright and Matthew Cohen are employees of IAG. Cohen, a known GOP operative, serves as the firm’s Executive Vice President.¹⁵ Cohen has previously consulted for former Republican Governor Chris Christie on his 2013 reelection campaign in New Jersey, as well as directly for the Republican National Committee.¹⁶ Wright, who serves as IAG’s Managing Director, previously served as a client strategist for Targeted Victory, a Republican public relations and consulting firm, and ran Missouri Republican State Senator Tony Luetkemeyer’s campaign in 2018.¹⁷

Jefferson Thomas previously worked with Cohen, Wright, and Cox at IAG, then known as HBS+, according to an archived webpage for the company.¹⁸

Wright and Cohen worked with Thomas to deliver nominating petitions for Dr. Stein in New Hampshire and were likely involved in the signature gathering process as well. As noted

¹²See Exhibit A

¹³Our Team, Impact Advocacy Group, <https://www.impactadvocacygroup.com/team> (last visited Sept. 18, 2024).

¹⁴Our Experts, Impact Advocacy Group, <https://www.impactadvocacygroup.com/team> (last visited Sept. 18, 2024).

¹⁵Our Experts, Impact Advocacy Group, <https://www.impactadvocacygroup.com/team> (last visited Sept. 18, 2024).

¹⁶Our Experts, Impact Advocacy Group, <https://www.impactadvocacygroup.com/team> (last visited Sept. 18, 2024).

¹⁷Our Experts, Impact Advocacy Group, <https://www.impactadvocacygroup.com/team> (last visited Sept. 18, 2024); Samuel Wright, LinkedIn, <https://www.linkedin.com/in/samuelfwright/> (last visited Sept. 18, 2024).

¹⁸Our Team, HBS+, <https://hbsplus.us/team/> [<https://web.archive.org/web/20230331034115/>] (last visited Sept. 18, 2024).

above, Wright signed a cover sheet submitted along with Stein petitions to the town of Merrimack that listed Thomas as the point of contact for the petitions.¹⁹ On August 6, 2024, Wright dropped off 2,261 nominating petitions for Dr. Stein in Manchester, according to the City Clerk’s receipt of nominating petitions, which Wright signed twice as the “Candidate or Designee,” denoting Wright—and by extension his employer IAG—as an authorized agent of the Stein Campaign.²⁰ (Fewer than half of these signatures were certified by the city as valid.) Cohen, as noted above, delivered 1,606 nominating petitions for Dr. Stein to the City Clerk’s Office in Nashua on August 5th. Although Cox’s name does not appear on the receipts or logs, she is the sole owner of IAG according to Arizona records.²¹ Therefore, the activities of Wright and Cohen as employees of IAG would have been conducted under her direction and control.

In total, the Stein Campaign reported on its website that it had gathered 7,619 petitions by the August 7, 2024 deadline for New Hampshire’s ballot access.²² Of the 7,619 petitions, at least 4,720 signatures—nearly two-thirds of the total—were submitted by Synapse and IAG employees on behalf of the Stein Campaign. Further examination of nominating petition receipts from other towns would likely show this to be an undercount and that Synapse and IAG operated widely across the state on behalf of Dr. Stein.

¹⁹See Exhibit A

²⁰See Exhibit A. While Wright does not list his professional affiliation on the town receipts, in Manchester he wrote down his personal phone number on the petition receipt, which he also used in a 2018 event notice for his then-boss State Sen. Candidate Tony Luetkemeyer; *Parade Walk With Tony Luetkemeyer - St. Joe Southside Fall Festival*, Platte County Republican Central Committee, <https://www.platterepublicans.org/event/parade-walk-with-tony-luetkemeyer-st-joe-southside-fall-festival/> (last visited Sept. 18, 2024).

²¹Entity Information for Impact Advocacy Group, Arizona Corporations Commission, <https://ecorp.azcc.gov/AzAccount> (follow “ecorp” hyperlink; then search entity field for “Impact Advocacy Group”).

²²Jill Stein for President Ballot Access Map, Jill Stein 2024, [https://www.jillstein2024ballotaccess.com/\[https://web.archive.org/web/20240901054745/\]](https://www.jillstein2024ballotaccess.com/[https://web.archive.org/web/20240901054745/]) (last visited Sept. 18, 2024).

LEGAL ANALYSIS

I. A “designee” is the equivalent of an “agent” for a candidate or authorized committee, indicating IAG and Synapse hold actual authority to act on behalf of the Stein Campaign.

While New Hampshire’s state laws do not define “designee” outright in the context of political campaigns or elections, other New Hampshire statutes offer instruction as to the meaning of the term and show that “designees” are strongly tied to those who have appointed them. In the medical context, a “designee” is “[someone] designated by the chief medical examiner to act on behalf of the chief medical examiner[.]”²³ In the New Hampshire criminal code, a commissioner’s designee is “a person officially connected with the commissioner,”²⁴ and Title 1 of New Hampshire’s code indicates designees are appointed by a person of higher authority.²⁵

Furthermore, Federal law in related contexts indicates that a “designee” is someone intentionally designated for a specific purpose and thus, directly affiliated with and a representative of their appointer. For instance, a “Presidential designee” is someone designated by the President “to have primary responsibility [of specific] functions[.]”²⁶ Additionally, Presidential designees are responsible for determining essential functions regarding ballot materials.²⁷

Another term for “designee” is an “agent.” Under FECA, an “agent” is “any person who has actual authority, either express or implied, to engage in [...] activities on behalf of [Federal

²³N.H. Rev. Stat. § 611-B:1(VI).

²⁴N.H. Rev. Stat. § 651-A:26(VII).

²⁵N.H. Rev. Stat. § 21-N:4(IV).

²⁶52 U.S.C. § 20301(a).

²⁷52 U.S.C. § 20310(2).

candidates.]”²⁸ According to the Restatement (Third) of Agency, “an agent’s actions may be attributed to a [Federal candidate] when the agent has actual authority (express or implied) or apparent authority.”²⁹ Agents hold express authority when the candidate gives specific written or oral instructions regarding actions to be taken.³⁰ Implied authority lacks the specificity from a Federal candidate, instead allowing the agent to make more pointed decisions based on the candidate’s general direction or intention for the agent.³¹ Apparent authority, however, is assumed when the Federal candidate “does something or permits the agent to do something which reasonably leads another to believe that the agent had the authority he purported to have.”³² Agents of Federal candidates are permitted to be “materially involved” in the creation, production, and distribution of communications on behalf of, or in support of, the candidate.³³ This includes contracting with a commercial vendor concerning the communication(s) to select the audience, poll the recipients, and, most importantly, “identifying voters or developing voter lists, mailing lists, or donor lists[.]”³⁴

Though New Hampshire’s code does not define “agent” in relation to a Federal candidate, in Title 63, Elections, of New Hampshire’s code an “agent” of a labor union is referred to as someone who is able to act “in behalf of such union [...] or by any organization

²⁸ 11 C.F.R. § 109.3.

²⁹ *Salyers v. Metro. Life Ins. Co.*, 871 F.3d 934, 940 (9th Cir. 2017) *citing* Restatement (Third) of Agency § 2 intro. note (2006).

³⁰ *Salyers v. Metro. Life Ins. Co.*, 871 F.3d 934, 940 (9th Cir. 2017) *citing*, *NLRB v. District Council of Iron Workers of the State of California and Vicinity*, 124 F.3d 1094, 1098 (9th Cir. 1997).

³¹ *Id.*

³² *Salyers v. Metro. Life Ins. Co.*, 871 F.3d 934, 940 (9th Cir. 2017) *citing* *Hawaiian Paradise Park Corp. v. Friendly Broad Co.*, 414 F.2d 750, 756 (9th Cir. 1969).

³³ 11 C.F.R. § 109.3(b).

³⁴ 11 C.F.R. § 109.21(d)(4)(ii).

representing or affiliated with any such union[.]”³⁵ Agents are also able to act on behalf of business organizations³⁶ and, most importantly, political candidates.³⁷

Here, the signature line on the receipt of the nominating petitions specified “Candidate or Designee signature,” indicating the signer was one of the two listed options. Based upon New Hampshire and Federal law, the petition receipt’s use of “designee” could not mean anyone other than an authorized, appointed individual, acting as an agent, designated for the responsibility of collecting, organizing, and submitting nominating petitions on behalf of Dr. Stein’s candidacy for the President of the United States. Thus, in signing on the “Candidate or Designee signature” line, Wright explicitly indicated and certified IAG’s status through Wright as a “designee” and “agent” holding actual authority from the Stein Campaign.

Additionally, it is indisputable that, at a minimum, Synapse held apparent authority as an agent on behalf of the Stein Campaign in submitting the nominating petitions on behalf of Dr. Stein. It is only reasonable to assume Dr. Stein and/or the Stein Campaign permitted Synapse to submit these petitions, and the Stein Campaign’s incorporation of those petitions into their website tally of signatures gathered further supports a reasonable assumption of agency. However, it is impossible for Synapse to not hold actual authority as an agent on behalf of the Stein Campaign, as indicated by their strategy in choice of location for nominating petition signature gathering. Without knowledge of the direction and intention of the Stein Campaign’s own signature gathering efforts, and permission to amplify those efforts, Synapse would not have known where, specifically, to collect so as not to duplicate the campaign’s efforts in the 234 municipalities of New Hampshire. In recognizing the Stein Campaign’s involvement in

³⁵N.H. Rev. Stat. § 664:4(II).

³⁶N.H. Rev. Stat. § 664:4-a(II).

³⁷N.H. Rev. Stat. § 664:2(XI).

Synapse’s efforts, it is undeniable that Synapse held actual authority to act as an agent on behalf of the Stein Campaign.

Thus, both IAG and Synapse are agents, under FECA, holding actual authority on behalf of the Stein Campaign.

II. Each of the nominating petitions submitted by Dr. Stein’s agents constituted coordinated expenditures and in-kind contributions required to be included on the Stein Campaign’s FEC reports.

Campaigns for Federal office are governed by the Act and interpretations of the Act through courts and the Commission. Under FECA, coordinated expenditures are treated as in-kind contributions to the recipient campaign.³⁸ Additionally, any group of persons that receive or make aggregate “contributions” or “expenditures,” respectively, greater than \$1,000 in any calendar year whose major purpose is electing Federal candidates is required to register and report as political committees with the Commission.³⁹ A “contribution” includes “any gift, subscription, loan, advance, or deposit of money anything of value made by any person for the purpose of influencing any election for Federal office[.]”⁴⁰ and an “expenditure” includes any “gift of[...]anything of value, made by any person for the purpose of influencing any election for Federal office.”⁴¹ In the current 2024 election cycle, individuals are limited to contributing a maximum of \$3,300 per election in either monetary or in-kind contributions.⁴² Imposing these restrictions on contributions protects “the integrity of our system of representative democracy.”⁴³

³⁸52 U.S.C. § 30116(a)(7)(B)(i).

³⁹52 U.S.C. § 30101(4)(A); *See Buckley v. Valeo*, 242 U.S. (1976).

⁴⁰52 U.S.C. § 30101(8)(A)(i).

⁴¹52 U.S.C. § 30101(9)(A).

⁴²Price Index Adjustments for Contribution and Expenditure Limitations and Lobbyist Bundling Disclosure Threshold, 88 Fed. Reg. 7,088, 7,089-90 (Feb. 2, 2023).

⁴³*Buckley v. Valeo*, 242 U.S. 1, 26-27 (1976).

While monetary contributions are easily identifiable, in-kind contributions come in many forms. The Commission has stated “the provision of any goods or services without a charge or at a charge that is less than the usual and normal charge [including membership and mailing lists,]”⁴⁴ and non-communication expenditures made with the intention of influencing Federal elections are both forms of in-kind contributions.⁴⁵ Nominating petition signatures intended to place a Federal candidate on the ballot are inherently a list of voters supporting that candidate’s bid for Federal office. Not only do petition signatures indicate a voter base, they include voter identification which would aid any party in contacting those specific voters using their name, address, phone number, and even date of birth, creating a list equivalent to a mailing or membership list—each identification is something of value. The FEC has explicitly stated mailing or membership lists supplied to a candidate or committee are an in-kind contribution unless they are provided in exchange for a “usual and normal charge[.]” as the value of such voter information exceeds contribution limits.⁴⁶ Organizations which have expended resources to compile a membership or mailing list, especially a mailing list including voters likely to, or who do, support a specific Federal candidate, have “created value that was passed on” by providing the list of supporters to the candidate.⁴⁷

Additionally, expenditures which are “made by any person in cooperation, consultation, or concert, with, or at the request or suggestion of, a candidate, his authorized political committees, or their agents,” are considered to be “coordinated expenditures.”⁴⁸ If an expenditure is not made for a communication but is intended to influence a Federal election, and

⁴⁴ 11 C.F.R. § 100.52(d)(1).

⁴⁵ 11 C.F.R. § 109.20(b).

⁴⁶ FEC Advisory Opinion 2022-12 (Ready for Ron), at 6-7, <https://www.fec.gov/files/legal/aos/2022-12/2022-12.pdf>.

⁴⁷ *Id.*

⁴⁸ 52 U.S.C. § 30116(a)(7)(B)(i).

is made in “cooperation, consultation or concert with, or at the request or suggestion of, a candidate, a candidate's authorized committee[,]”⁴⁹ it is an “in-kind contribution to. . .the candidate. . .with whom or with which it was coordinated.”⁵⁰ The Commission unanimously reaffirmed the value of lists and data resulting from canvassing earlier this year in Advisory Opinion 2024-01 (“TMP AO”), stating data provided to a Federal candidate or campaign for “less than the usual and normal charge” results in an excessive in-kind contribution to such candidate or campaign, as provided under 11 C.F.R. § 109.20.⁵¹

In MUR 5783, the Commission found that “expenses incurred in gathering signatures to qualify for a ballot for Federal office are expenditures.”⁵² If a third-party finances these ballot qualification efforts, and coordinates those efforts with a Federal candidate, their authorized committee, or agents thereof, “the expenditures constitute in-kind contributions to the candidate.”⁵³ The Commission voted 5-1 that the Green Party of Luzerne County Pennsylvania had made, and Green Party Senate candidate Carl J. Romanelli had accepted, excessive in-kind contributions by way of coordinated petition signature gathering efforts.⁵⁴

A. Impact Advocacy Group and its principals made excessive and illegal in-kind contributions which were accepted by the Stein Campaign.

IAG is an “agent” of Dr. Stein and/or the Stein Campaign. Since “designees” are considered in a virtually identical way to “agents” under both the New Hampshire and Federal

⁴⁹*Id.* § 109.20(a).

⁵⁰ 11 C.F.R. § 109.20(b). A different regulation, not applicable in the instant case, governs communication activities which are coordinated with a candidate.

⁵¹ FEC Advisory Opinion 2024-01 (Texas Majority PAC), at 4-7, <https://www.fec.gov/files/legal/aos/2024-01/2024-01.pdf>.

⁵² MUR 5783 (Green Party of Luzerne County), General Counsel’s Report #2, at 9, *citing* MUR 5581 (Nader for President 2004), Factual and Legal Analysis at 3; AO 2006-20 (Unity 08) at 3.

⁵³ MUR 5783 (Green Party of Luzerne County), General Counsel’s Report #2 at 9, *citing* MUR 5581, F&LA at 3; MUR 5533 (Nader for President 2004), Statement of Reasons at 2.

⁵⁴ MUR 5783 (Green Party of Luzerne County), Disposition.

law, in holding the title of “designee,” IAG is also an undeniable “agent” for Dr. Stein and the Stein Campaign as solidified by Wright’s signature attestation as a “designee” on the nominating petition certification submitted by IAG. As “designees” and “agents” are designated and directly affiliated and related to their designating authority, a contribution made by a “designee” in this context cannot be anything but coordinated with the candidate and/or candidate’s committee, due to the synonymous nature of “designee” and “agent,” making each of the nominating petitions submitted by IAG to the City of Manchester a coordinated expenditure and thus an in-kind contribution. Though the Stein Campaign did not, or has not yet, paid IAG to collect, organize, and submit these petitions, IAG’s actions in doing so, as an established “agent” for Dr. Stein and the Stein Campaign, as well as paying the expenses involved in the petition gathering efforts, are a gift of services to the Stein Campaign and thus, a contribution. As such, IAG’s collection, organization, and submission of each nominating petition to the City of Manchester, New Hampshire, was a coordinated expenditure and in-kind contribution required to be reported by Jill Stein for President 2024.

B. Synapse Group and its principals made excessive and illegal in-kind contributions which were accepted by the Stein Campaign.

Synapse’s submissions of each nominating petition to the cities and towns of Rochester, Nashua, Merrimack, Hudson, and Derry also constitute coordinated expenditures and in-kind contributions that should have been reported as such by the Stein Campaign under the Act. In paying petition circulators to collect signatures supporting the Stein Campaign, organizing the petitions, and submitting them to the respective city authorities, Synapse gifted the Stein Campaign services, in the form of 2,459 signed nominating petitions, which meet the standard for a contribution. In order to effectively gather signatures for the nominating petitions, without jeopardizing the Stein Campaign’s own signature gathering efforts, Synapse had to hold

knowledge of the direction and intention of the Stein Campaign, indicating Synapse's status as an agent with actual authority to act on behalf of the Stein Campaign. To date, the Stein Campaign has made no disclosure of a disbursement or expenditure to Synapse for ballot access consulting services, nor has the Stein Campaign disclosed any in-kind contributions received from Synapse.

C. The quantity of petitions submitted by these GOP operatives implicates explicit coordination by the Stein Campaign.

The sheer enormity of the amount of petition signatures gathered, organized, and submitted by IAG and Synapse compared to the total number of signatures reported by the Stein Campaign implicates the Stein Campaign's intentional and inevitable coordination. New Hampshire requires a total of 3,000 signatures to place a candidate on the ballot for President of the United States.⁵⁵ Without the 4,720 signatures from IAG and Synapse, it would not have been possible for the Stein Campaign to succeed in their New Hampshire ballot access ploy, leaving them with only 2,899 total signatures—101 short of New Hampshire's total requirement.

Not only would the Stein Campaign have been shy of the total requirement, but IAG and Synapse's efforts truly secured Stein's bid by providing 2,872 petitions in New Hampshire's 1st District—solidifying the minimum of 1,500 needed per district.⁵⁶ There is no conceivable way IAG and Synapse could have collected, organized, and submitted 4,720 nominating petitions securing the Stein Campaign's space on the ballot without inside information from the Stein Campaign on (i) how many signatures they still required to gain ballot access, and (ii) which areas the signatures needed to be located in to meet and exceed New Hampshire's statutory requirements. Seeing how the majority were collected in New Hampshire's 1st Congressional

⁵⁵N.H. Rev. Stat. § 655:42(I).

⁵⁶N.H. Rev. Stat. § 655:42(I).

District, the strategy executed in the collection by IAG and Synapse had to have been, at least in part, directed and dictated by the necessities and shortcomings of the Stein Campaign's own signature collection efforts—making these signature gathering, organizing, and submission services coordinated expenditures and in-kind contributions.

Further than just which of the New Hampshire Congressional Districts were short of New Hampshire's 1,500 requirement, the specific cities from which IAG and Synapse collected signatures is indicative of coordination with the Stein Campaign. IAG and Synapse collected, or directed the collection of, signatures in the cities of Manchester, Merrimack, Derry, Rochester, Hudson, and Nashua. According to New Hampshire's code, registered voters are only permitted to sign one nomination paper on behalf of a candidate for the office of President of the United States.⁵⁷ Had IAG and Synapse collected duplicate signatures, their efforts in gaining a ballot space for Dr. Stein would have collapsed. In the interest of best fulfilling their desire to secure ballot access for Dr. Stein, IAG and Synapse needed to know which cities, or even counties, the Stein Campaign was currently or had previously collected nominating petition signatures to avoid any chance of duplicating such signatures and thus, failing to secure the statutorily required number of signatures on behalf of the Stein Campaign. This knowledge would only have been attainable through concise coordination between IAG, Synapse, and the Stein Campaign. Respondents' coordination and financial responsibility for IAG and Synapse signature gatherers' services makes these efforts coordinated expenditures and thus, in-kind contributions.

Though they are not a monetary donation, they are an in-kind contribution required to be valued at the market price value of the services, including the amount the petition gatherers were

⁵⁷N.H. Rev. Stat. § 655:40.

paid by IAG and Synapse, as well as any other expenses related to collecting, organizing, and submitting the nominating petitions.

PRAYER FOR RELIEF

For the above reasons, the Commission should find reason to believe Respondents violated FECA and corresponding Commission regulations. The Commission has a responsibility to conduct an immediate investigation pursuant to 52 U.S.C. 30109(a)(2). The FEC should pursue appropriate sanctions for all violations, and it should pursue additional remedies as necessary and appropriate to procure compliance with the Act and corresponding Commission regulations, including any referrals for knowing and willful violations.

Sincerely,

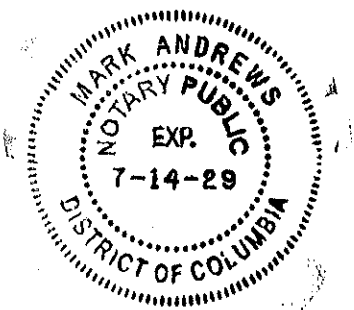


Tiffany Muller
End Citizens United
PO Box 66005
Washington, DC 20035

SUBSCRIBED AND SWORN to before me this 2nd day of October 2024.



Notary Public
My Commission Expires:



MARK ANDREWS
NOTARY PUBLIC DISTRICT OF COLUMBIA
... My Commission Expires July 14, 2029