

OFFICE OF  
GENERAL COUNSEL

March 30, 2018

2018 MAY -3 AM 11: 53

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

MUR # 7377

Dear Sir or Madam:

I write to file a complaint against Benjamin Wolf, a former candidate for the U.S. House of Representatives in Illinois' Fifth Congressional District, and his campaign committee, Wolf 2018, for which Mr. Wolf himself serves as Treasurer, over violations committed in connection with the recently concluded March 20, 2018 Democratic primary election.

The available facts indicate that Mr. Wolf made a large, undisclosed contribution to his campaign so that he could finance and conceal an unsuccessful effort to remove his opponent from the ballot. The facts indicate also that Mr. Wolf repeatedly violated the "stand by your ad" provisions of the Bipartisan Campaign Reform Act of 2002. The Commission should investigate these violations, seek the maximum penalties available under law, and seek injunctive relief so that Mr. Wolf cannot commit these same violations while seeking office again.

*First*, a federal candidate's campaign committee must itemize and report all contributions it receives aggregating more than \$200 in the election cycle, including expenditures which the candidate makes on behalf of the campaign. *See* 11 C.F.R. 104.8(a); *see also* Campaign Guide for Congressional Candidates at 91 (2014), <https://www.fec.gov/resources/cms-content/documents/candgui.pdf>.

However, Mr. Wolf issued check number 1830 dated November 30, 2017 for \$1,000 to Tom Greenhaw for a "software program" – a transaction Wolf never reported on his 2017 Year-End Report. *See* Exhibit A; *see also* <http://docquery.fec.gov/pdf/358/201801119090393358/201801119090393358.pdf>. Mr. Greenhaw's software offers candidates "a way ... [to] check their opponents' petition signatures quickly." Nona Tepper, *RF candidate hopes for write-in votes for County Clerk*, OakPark.com (Feb. 28, 2018), <http://www.oakpark.com/News/Articles/2-28-2018/RF-candidate-hopes-for-write-in-votes-for-County-Clerk/>. Mr. Greenhaw himself has said:

It is a disturbingly common tactic to file an overwhelming amount of forged, fake and fraudulent signatures on a candidate's petition. It's done in the hope of making it too difficult to review them all in the very short time period that the signatures can be contested ... The PetitionReview software helps campaigns and their volunteers review petition signatures much faster to help them object to these fraudulent petition signatures.

Mr., Wolf himself prepared and filed the 2017 Year End Report – he was the treasurer for his own campaign. *See*

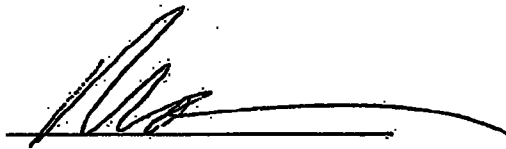
<http://docquery.fec.gov/pdf/358/201801119090393358/201801119090393358.pdf>.

Thus, the facts strongly indicate that Mr. Wolf engaged Mr. Greenhaw in a failed effort to disqualify his opponent, paid Mr. Greenhaw personally, and then purposefully omitted the transaction from the FEC report to conceal the effort. I believe that Mr. Greenhaw can verify the circumstances of the payment.

*Second*, a federal candidate's authorized broadcast, cable and satellite communications must have a clear written statement during the last four seconds, stating that the candidate approved the communication. See 11 C.F.R. 110.11(c)(3)(iii). It is possible that *none* of Mr. Wolf's ads complied with this requirement, even while carefully crafted to garner media attention by showing him brandishing assault weapons, <https://www.youtube.com/watch?v=pxvCgJ6Rxp8> and petting his dog, <https://www.youtube.com/watch?v=pxvCgJ6Rxp8>. See also <https://www.youtube.com/watch?v=pxvCgJ6Rxp8> (also omitting required disclaimer). Mr. Wolf's repeated failure to "stand by his ads" cannot be explained away as a one-time mistake. He simply acted as if the law did not exist at all, thus making enforcement the only appropriate remedy.

Together, these violations evidence Mr. Wolf's clear, purposeful, and personal disregard for the campaign finance laws. I respectfully ask the Commission to investigate these violations, seek the highest penalties available under law, and obtain an injunction so that they never recur. In the case of the undisclosed contribution, because of the clear motive for concealment, and because of Mr. Wolf's direct involvement both in purchasing the software and filing the report that failed to disclose the purchase, the Commission should determine whether referral for criminal prosecution is warranted.

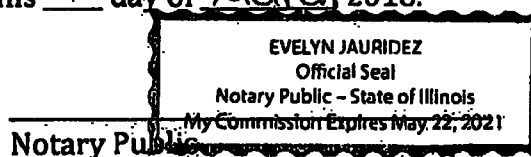
Sincerely,



Robin Dusek

Chicago, IL 60614

SUBSCRIBED AND SWORN to before me this 30 day of March 2018.



My Commission Expires:

Date	Description	Amount	Account
12/01/2017	Check 1830	\$1,000.00	

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**BENJAMIN T. WOLF**  
1728 N DAMEN AVE 215  
CHICAGO, IL 60647

1830  
CHECK #

11/30/2017

Pay to the Order of Tom Gersthan \$ 1000.00  
one thousand dollars Dollars

 **USAA FEDERAL SAVINGS BANK**  
LISTED MEMBER FDIC  
SAN ANTONIO, TEXAS 78204  
875 BRIDGE 1-800-433-8700

For software program

*[Signature]*

*[Signature]*  
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