

BEFORE THE FEDERAL ELECTION COMMISSION

BOBBIE TODD
P.O. Box 75442
North Chesterfield, VA 23236

v.

MUR.No. 7604

FRIENDS OF VANGIE WILLIAMS
P.O. Box 7572
Fredericksburg, VA 22404

STACY BULLOCK, in her official capacity as TREASURER
of FRIENDS OF VANGIE WILLIAMS
P.O. Box 7572
Fredericksburg, VA 22404

2019 MAY - 6 PM 12: 39
OFFICE OF
GENERAL COUNSEL

COMPLAINT

1. This complaint is filed pursuant to, and is based on information providing reason to believe that Lavangalene (“Vangie”) Williams’ campaign committee, Friends of Vangie Williams (“FOVW”; FEC ID #C00632059), violated reporting requirements of the Federal Election Campaign Act (“the Act”), 52 U.S.C. § 30101, *et seq.*, and Federal Election Commission regulations.
2. Specifically, based on personal knowledge and information and belief, as well as publicly available data, Complainant has reason to believe that FOVW has failed to properly report certain debts and obligations owed by the campaign as required.
3. Complainant submits this complaint in accordance with 52 U.S.C. § 30109. “If the Commission, upon receiving a complaint . . . determines . . . that it has reason to believe that a person has committed, or is about to commit, a violation of th[e] Act . . . [t]he Commission shall make an investigation of such alleged violation.” 52 U.S.C. § 30109(a)(2).

FACTS

4. Complainant was employed by FOVW as Communications Manager from July 23, 2018 through November 6, 2018, when Mrs. Williams lost to Congressman Rob Wittman in the general election.
5. In or around late January 2019, Complainant received a letter from Joel Leonard, Campaign Manager for Mrs. Williams and Executive Director of FOVW, that provided assurance that it his and FOVW’s “highest priority to make sure that all staff receive

compensation for the week of November 1-6, 2018 as soon as [they] have raised the funds to do so.”¹

6. At the time of this filing, Complainant has still not received her final wages for the work she completed during the first week of November 2018.
7. Complainant has reason to believe that other individuals who worked for FOVW in support of Mrs. Williams’ campaign have not been paid their final wages as of the date of this complaint, either.
8. While the amount of final wages owed to Complainant by FOVW totals less than \$500, Complainant has reason to believe that the amount of final wages due to all unpaid former employees is in excess of \$500.
9. As acknowledged by Mr. Leonard in his January letter, FOVW was aware of the debt owed. However, despite this knowledge, FOVW never reported these debts in its 2018 Year End Report,² Post-General 2018,³ or April 2019 Quarterly⁴ reports.

SUMMARY OF THE LAW

10. The Act and Commission regulations require committees to report debts and obligations continuously if they exceed \$500 or have been outstanding 60 days or more.
11. A debt of \$500 or less is reportable once it has been outstanding 60 days from the date incurred, and the debt must be disclosed on the next regularly scheduled report. A debt exceeding \$500 must be disclosed in the report covering the date on which the debt was incurred, and must be reported on Schedule D until it is repaid in full. 11 CFR 104.3(d) and 104.11.

CAUSES OF ACTION

COUNT I:

FRIENDS OF VANGIE WILLIAMS FAILED TO PROPERLY DISCLOSE DEBTS AND OBLIGATIONS OWED BY THE COMMITTEE IN VIOLATION OF THE ACT

12. While the exact amount of past due wages owed to all former employees of FOVW is unknown, FOVW was still responsible for reporting these debts in their FEC filings in accordance with the Act.

¹ A true and correct copy of this letter is attached hereto as Exhibit “A.”

² Available at <http://docquery.fec.gov/cgi-bin/forms/C00632059/1313533/sd/10> (amended version filed on February 1, 2019; last accessed May 2, 2019)

³ Available at <http://docquery.fec.gov/cgi-bin/forms/C00632059/1293393/sd/10> (filed on November 30, 2018; last accessed May 2, 2019)

⁴ Available at <http://docquery.fec.gov/cgi-bin/forms/C00632059/1325206/> (filed on April 15, 2019; last accessed May 2, 2019)

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13. Despite being aware of these debts and obligations that were owed, FOVW repeatedly failed to report the owed wages on Schedule D of all reports filed since becoming aware of the debt.
14. If the amount of owed wages exceeds \$500, the debt should have been disclosed in the Post General 2018 report filed on November 30, 2018 and reported in all subsequent reports until said wages were paid.
15. If the total amount of wages owed was less than \$500, as is the case with the wages owed to Complainant specifically, it should have been included in the April 2019 Quarterly report.
16. Further, any payments of the owed wages made to former employees, that may or may not have occurred, should have been reported on the Detailed Summary Page and itemized in Schedules B and/or D in the appropriate reports. Additionally, any contributions raised to cover these debts should have been specifically designated for that election by the contributors and otherwise comply with 11 CFR 110.1(b).

Prayer for Relief

17. Complainant respectfully requests that the Commission find reason to believe that FOVW violated the Act and Commission regulations by failing to properly report debts and obligations owed by the committee and open an investigation in accordance with 52 U.S.C. § 30109. Complainant further requests that the Commission determine and impose appropriate sanctions for any and all violations, should enjoin respondent(s) from any and all violations in the future, and should impose any additional remedies as are necessary and appropriate to ensure compliance with the Act and Commission regulations.

May 2, 2019

Respectfully submitted,

Bobbie Todd



Complainant:

Bobbie Todd
P.O. Box 75442
North Chesterfield, VA 23236

CITY/COUNTY OF CHESTERFIELD,
COMMONWEALTH OF VIRGINIA
SWORN AND SUBSCRIBED BEFORE ME THIS
2nd DAY OF May, 20 19
NOTARY PUBLIC

19944474230

Exhibit "A"

Vangie
Williams
for CONGRESS

January 10, 2019

Bobbie Todd

Beale AFB, CA 95903

Dear Ana:

If you haven't already, you will soon receive your W-2 form from Friends of Vangie Williams. For most employed with the campaign, the period of paid employment was July 1, 2018 to November 6, 2018 with the official date of layoff being November 7, 2018.

I assure you that it is our highest priority to make sure that all staff receive compensation for the week of November 1- 6, 2018 as soon as we have raised the funds to do so. We have restarted our fundraising operation and hope to be able to issue checks in the next few weeks.

I want to thank you for your hard work and dedication to the campaign. Because of our efforts, Vangie managed to receive a record-setting number of votes for a midterm election in VA01. Now we are building on that success and preparing for an even more robust and aggressive campaign in 2020.

Again, on behalf of Friends of Vangie Williams, thank you!



Joel Leonard
Executive Director