

APR 1 7 2018

Elizabeth Curtis, Treasurer Lonegan for Congress, Inc. 370 W. Pleasantview Ave. Hackensack, NJ 07601

Dear Ms. Curtis:

The Federal Election Commission received an improper complaint that indicates you and Lonegan for Congress, Inc. may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the improper complaint is enclosed. Since the submission failed to satisfy the requirements of 52 U.S.C. § 30109(a)(1) and 11 C.F.R. § 111.5, it will not be processed by the Commission. You are being provided with this notice for informational purposes only. No action or response is necessary. In the event the complainant re-files the improper complaint and it meets the requirements under the Act, you will be notified and provided a copy of the proper complaint.

This matter will remain confidential in accordance with 52 U.S.C. § 30109(a)(4)(B) and § 30109(a)(12)(A). If you have any questions, please contact me at (202) 694-1650 or toll free at 1-800-424-9530.

Sincerely,

Mary deBeau

Paralegal Specialist

May diBa

Complaints Examination &

Legal Administration

Enclosure:

Improper Complaint



GENERAL COUNSEL

(UIB MAR 13 PM 4: 29

Tim Eustace Assemblyman, 38th District 2 Mercer Street Lodi, NJ 07644 (973) 928-6256 AsmEustace@NJLeg.org

Federal Election Commission 999 E St NW Washington, DC 20463

To Whom It May Concern:

This is a formal ethics complaint against Steve Lonegan.

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There is substantive and direct evidence that Steve Lonegan, a resident of Hackensack, New Jersey, and candidate for New Jersey's Fifth Congressional District, is in violation of several FEC regulations and House Ethics Committee guidelines.

Specifically, and without limitation, your attention is directed to the following:

- 1. Steve Lonegan is a filed candidate for the House of Representatives from New Jersey's Fifth Congressional District.
- 2. All candidates, pursuant to FEC regulations and House Ethics guidelines are required to disclose their finances, including assets and sources of income. The foundational principle underlying this important guideline is to encourage, transparency and preclude any conflicts of interests.
- 3. Prior to announcing his candidacy on August 24, 2017, Steve Lonegan was the New Jersey State Chairman of the Ted Cruz for President campaign and employed by the Courageous Conservatives PAC. This PAC is funded, in large part, by Stan Herzog and Christopher Eckstrom and played a considerable and direct role in efforts including at the 2016 Republican Convention to stop then candidate-Donald Trump from attaining the Republican nomination. It has also been involved in efforts to attack LGBT Americans and support Roy Moore in Alabama.
- 4. According to FEC guidelines, Super PACs are independent, expenditure only committees, and direct coordinated communication with a campaign is expressly prohibited. Essentially, Super PACs may not directly participate in the direction, messaging, or coordination of strategy with a campaign and there must be clear delineations and firewalls to prevent such (See 11 CFR § 109.22). Also, see guidance from the FEC on coordination.

- 5. Even after Steve Lonegan announced his candidacy for Congress in New Jersey's Fifth District, evidence strongly suggests that he was either still working for the Courageous Conservatives PAC and potentially coordinating activity with his own campaign, in violation of 11 CFR § 109.22.
 - a. As you can see in the attached screenshot, congressional candidate Steve Lonegan appeared on CNN in February 2018, after filing as a candidate on August 19, 2017, with the chyron "Courageous Conservative PAC member." This is evidence that he is still working for the super PAC; and
 - b. On February 7, Lonegan appeared again on CNN and was introduced as "Steve Lonegan of Courage Conservatives PAC." Even when given a chance to correct the host, he did not.; and
 - c. As a further example of the illegal and improper coordination and alliance between Lonegan's congressional campaign for the Fifth District and the Super PAC (Courageous Conservative PAC), even after announcing his official candidacy for the Republican nomination, Elizabeth Curtis, Steve Lonegan's current and longtime Treasurer [see disclosure form with Curtis' name listed as Treasurer], was still serving as Treasurer for both Steve Lonegan for Congress and for Courageous Conservatives PAC. Moreover, Steve Lonegan's campaign did not disclose any payment for Curtis. This raises a critical issue, to wit; if Elizabeth Curtis provides free services to Steve Lonegan's campaign from the super PAC, it is again a violation of campaign laws. (See attached); and
 - d. There are disturbing indications that Super PACs, including Courageous Conservatives PAC, intends to be active in Steve Lonegan's congressional campaign. His Treasurer recently moved to be Treasurer of Courageous Conservatives PAC and Steve Lonegan posted B-roll footage (footage with no sound) on Facebook for easy access by a Super PAC. This implicitly reinforces Steve Lonegan's attempt to circumvent the clear laws against coordination between candidate committees and Super PACs. and
- 6. Steve Lonegan may have also violated the Ethics in Government Act of 1978 (EIGA), by failing to disclose any earned income from Courageous Conservatives PAC on his Personal Financial Disclosure. Attached, please find a copy of Steve Lonegan's Personal Financial Disclosure form.

Sincerely,

Tim Eustace

Assemblyman, District 38

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FEDERAL ELECTION COMMISSION

HOME / CAMPAIGN FINANCE DATA / COMMITTEE DETAILS / HTML VIEWER

FEC FORM 1

STATEMENT OF ORGANIZATION

FILING FEC-1196693

1. COURAGEOUS CONSERVATIVES PAC

5 Halifax Ct Marlton, NJ 08053 Email: financeccpac@gmail.com

NOTE: Email address is different than previously reported

2. Date: 01/10/2018

3. FEC Committee ID #: Coo587022

This committee supports/opposes more than one Federal candidate and is NOT a separate segregated fund or a party committee.

Affiliated Committees/Organizations

NONE

Custodian of Records:

Amanda Fahy 212 Yeardley Ave Lynchburg, VA 24501 Title: Treasurer

Treasurer:

Amanda Fahy 212 Yeardley Ave Lynchburg, Virginia 24501 Title: Treasurer

Designated Agent(s):

Banks or Depositories

Wells Fargo 179 NJ 70 Medford, New Jersey 08055

Signed: Amanda Fahy Date Signed: 01/10/2018

(End FEC FORM 1)

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Federal Election Commission, 999 E Street, NW, Washington, DC 20463 (800) 424-9530 In Washington (202) 694-1100
For the hearing Impaired, TTY (202) 219-3336 Send comments and suggestions about this site to: webmaster@fec.gov.







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HOME / CAMPAIGN FINANCE DATA / COMMITTED DETAILS / HTML VIEWER

FEC FORM 1

STATEMENT OF ORGANIZATION

FILING FEC-1079130

1. COURAGEOUS CONSERVATIVES PAC

5 Halifax Ct Marlton, NJ 08053

NOTE: Address is different than previously reported Email: elizabeth.curtis@Verizon.net

NOTE: Email address is different than previously reported

2. Date: 06/20/2016

3. FEC Committee ID #: C00587022

This committee supports/opposes more than one Federal candidate and is NOT a separate segregated fund or a party committee.

Affiliated Committees/Organizations

NONE

Custodian of Records:

Elizabeth Dawn Curtis 5 Halifax Ct Marlton, NJ 08053 Title: Treasurer Phone # (609) 443-8620

Treasurer:

Elizabeth Dawn Curtis 5 Halifax Ct Marlton, New Jersey 08053 Title: Treasurer Phone # (609) 443-8620

Designated Agent(s):

Banks or Depositories

Wells Fargo 179 NJ 70 Medford, New Jersey 08055

Signed: Elizabeth Dawn Curtis Date Signed: 06/20/2016

(End FEC FORM 1)

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For the hearing Impaired, TTY (202) 219-3336 Send comments and suggestions about this site to: webmaster@fec.gov.







SCHEDULE C - EARNED INCOME

Name: Steven ٩. 6

Liet the source, type, and amount of earned income from any source (other than the filer's current employment by the U.S. government) totaling \$200 or more during the reporting period. For both the filer and filer's spouse, list the source and amount of any honoraria. List only the source of other spouse gerned income exceeding \$1,000. See examples below.

EXCLUDE: Military pay (such as National Guard or Reserve pay), federal retirement programs, and benefits received under the Social Security Act.

INCOME LIMITS and PROHIBITED INCOME: Be advised that the income limit and prohibited income may apply to you after you are on House payors. The 2016 limit on outside earned income for professional services involving a flotclary relationship) are totally prohibited for Members and senior staff.

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	I certify that I have examined the	is Statement and to the best of my impaleogs and belief it is	The correct and community						
	Type or Print Name of Treasurer Elizabeth Curtis								
	Signature of Treasurer Elizabeth Codes Date 07 19 2014								
	NOTE: Submission of tatue, encapsus, or incomplete information may subject the pleason signing this Statement to the penalties of 2 U.S.C. \$437g. ANY CHANGE IN INFORMATION SHOULD SE REPORTED WITHIN 10 DAYS.								
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FEC Form 1 (Revised 02/2009)

5. TYPE OF COMMITTEE

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FEDERAL ELECTION COMMISSION

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FEC FORM 1

STATEMENT OF ORGANIZATION

FILING FEC-981388

1. Lonegan For Congress

5 Halifax Ct Marlton, NJ 08053

NOTE: Address is different than previously reported Email: elizbeth.curtis@verizon.net

NOTE: Email address is different than previously reported

2. Date: 12/22/2014

3. FEC Committee ID #: Coo555284 This committee is a Principal Campaign Committee. Candidate: Steven Lonegan Party: Republican Party Office Sought: House of Representatives
State is New Jersey in District: 03

Affiliated Committees/Organizations

Custodian of Records:

Elizabeth Curtis 5 Halifax Ct E Marlton, NJ 08053 Title: Custodian Phone # (609) 433-8620

Treasurer:

Elizabeth Curtis 5 Halifax Ct E Marlton, New Jersey 08053 Title: Treasurer Phone # (609) 433-8620

Designated Agent(s):

Elizabeth Curtis 5 Halifax Ct E Marlton, New Jersey 8053 Phone # (600) 433-8620

Banks or Depositories

TD Bank 1398 Hwy 9 Somerset, New Jersey 08875

First Virginia Community Bank 11325 Random Hills Rd Fairfax, Virginia 22030

Signed: Elizabeth Curtis Date Signed: 12/22/2014

(End FEC FORM 1)

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