



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

APR 17 2018

Elizabeth Curtis, Treasurer  
Lonigan 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 Lonigan 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.

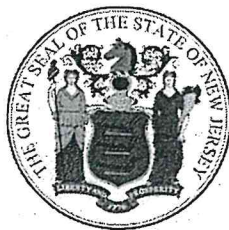
This matter will remain confidential in accordance with 52 U.S.C. § 30109(a)(4)(B) and § 30109(a)(12)(A). If you have any questions, please contact me at (202) 694-1650 or toll free at 1-800-424-9530.

Sincerely,

A handwritten signature in cursive script, appearing to read "Mary deBeau".

Mary deBeau  
Paralegal Specialist  
Complaints Examination &  
Legal Administration

Enclosure:  
Improper Complaint



OFFICE OF  
GENERAL COUNSEL

2018 MAR 13 PM 4:29

Tim Eustace  
Assemblyman, 38<sup>th</sup> 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.

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

FEA4N026

FEC Schedule B (Form 3X) Rev. 12/2015

Image# 201608199022577891

**SCHEDULE B (FEC Form 3X)  
ITEMIZED DISBURSEMENTS**

Use separate schedule(s) for each category of the Detailed Summary Page

FOR LINE NUMBER: (check only one)

PAGE 11 OF 31

<input checked="" type="checkbox"/> 21b	<input type="checkbox"/> 22	<input type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25	<input type="checkbox"/> 26
<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c	<input type="checkbox"/> 29	<input type="checkbox"/> 30c

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

**COURAGEOUS CONSERVATIVES PAC**

Full Name (Last, First, Middle Initial)

**A. Law Office of James C Thomas III**

Mailing Address 7509 NW Tiffany Springs Pkwy  
Suite 300

City Kansas City State MO Zip Code 64153

Purpose of Disbursement  
Legal Consulting

Candidate Name

Office Sought:  House  Senate  President

Disbursement For: 2016  
 Primary  General  
 Other (specify) ▼

State: District:

Date of Disbursement

07 21 2018

Transaction ID : SB21B.4882

Amount of Each Disbursement this Period

2190.00

**B. Steve Lonagan**

Mailing Address 158 Krone Place

City Hackensack State NJ Zip Code 07601

Purpose of Disbursement  
See Memo Items Below

Candidate Name

Office Sought:  House  Senate  President

Disbursement For: 2016  
 Primary  General  
 Other (specify) ▼

State: District:

Date of Disbursement

07 25 2016

Transaction ID : SB21B.4864

Amount of Each Disbursement this Period

368.40

**C. Regus**

Mailing Address 600 Superior Ave East  
Ste 1309

City Cleveland State OH Zip Code 44114

Purpose of Disbursement  
Office Rental

Candidate Name

**COURAGEOUS CONSERVATIVES PAC**

Office Sought:  House  Senate  President

Disbursement For: 2016  
 Primary  General  
 Other (specify) ▼

State: District:

Date of Disbursement

07 25 2016

Transaction ID : SB21B.4864.0

Amount of Each Disbursement this Period

365.40

SUBTOTAL of Disbursements This Page (optional).....▶

3068.40

TOTAL This Period (last page this line number only).....▶

FEA4N026

FEC Schedule B (Form 3X) Rev. 12/2015

Image# 201608199022577892

**SCHEDULE B (FEC Form 3X)  
ITEMIZED DISBURSEMENTS**

Use separate schedule(s) for each category of the Detailed Summary Page

FOR LINE NUMBER: (check only one)

PAGE 12 OF 31

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<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c	<input type="checkbox"/> 29	<input type="checkbox"/> 30c



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 #: 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:

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

Treasurer:

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

Designated Agent(s):

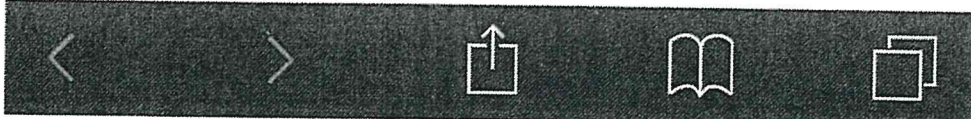
Banks or Depositories

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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**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**

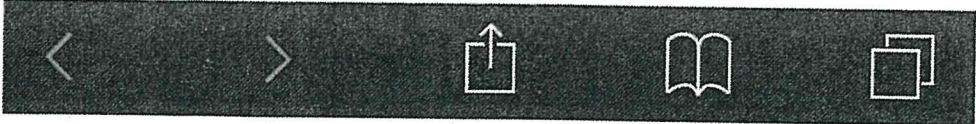
Wells Fargo  
179 NJ 70  
Medford, New Jersey 08055

**Signed: Elizabeth Dawn Curtis**

**Date Signed: 06/20/2016**

**(End FEC FORM 1)**

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FEC FORM 1 STATEMENT OF ORGANIZATION RECEIVED 2014 JAN 22 PM 3:03 FEC MAIL CENTER

1. NAME OF COMMITTEE (in full) (Check if name is changed) Example: If typing, type over the lines. 12FB4MS

LONEGAN, FOR CONGRESS, INC

ADDRESS (number and street) 11000 W.S. HWY. 9, N. STE. 204

(Check if address is changed) WOODBRIDGE NJ 07095-1

CITY STATE ZIP CODE

COMMITTEE'S E-MAIL ADDRESS

(Check if address is changed) ELIZABETH.LONEGAN2014.COM

Optional Second E-Mail Address

COMMITTEE'S WEB PAGE ADDRESS (URL)

(Check if address is changed)

2. DATE 01.19.2014

3. FEC IDENTIFICATION NUMBER

4. IS THIS STATEMENT NEW (N) OR AMENDED (A)

I certify that I have examined this Statement and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer Elizabeth Curtis

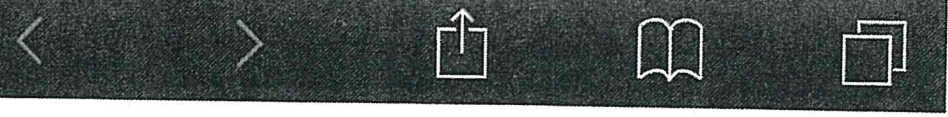
Signature of Treasurer Elizabeth Curtis Date 01.19.2014

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. §437g. ANY CHANGE IN INFORMATION SHOULD BE REPORTED WITHIN 10 DAYS.

Office Use Only For further information contact: Federal Election Commission Tel Free 800-424-9530 Local 202-694-1900 FEC FORM 1 (Revised 06/2012)

14051160366

5. TYPE OF COMMITTEE







FEDERAL ELECTION COMMISSION

HOME / CAMPAIGN FINANCE DATA / COMMITTEE DETAILS / HTML VIEWER

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: elizabeth.curtis@verizon.net

NOTE: Email address is different than previously reported

2. Date: 12/22/2014

3. FEC Committee ID #: C00555284 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 # (609) 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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