FEDERAL ELECTION COMMISSION

In the matter of:

Mike Crapo for U.S. Senate
Freedom Fund
Idaho Conservative Growth Fund
223 C Street, LLC
Vicki Hart as Governor of
223 C Street, LLC

MUR ___

COMPLAINT

1. Campaign for Accountability ("CfA") and Daniel E. Stevens bring this complaint before the Federal Election Commission ("Commission" or “FEC”) seeking an immediate investigation and enforcement action against Mike Crapo for U.S. Senate, Freedom Fund, Idaho Conservative Growth Fund, 223 C Street, LLC and Vicki Hart, as Governor of 223 C Street, LLC, for direct and serious violations of the Federal Election Campaign Act ("FECA") and Commission regulations.

Complainants

2. Complainant CfA is a Section 501(c)(3) organization dedicated to ensuring accountability of public officials and compliance with federal laws. Toward this end, CfA seeks to protect and advance the right of citizens to be informed about the activities of government officials and to ensure the integrity of government officials and the government decision-making process by exposing unethical and illegal conduct of those involved in government. CfA uses research, litigation, and communications to advance its mission.

3. In furtherance of its mission, CfA also monitors campaign finance activities of those who finance federal elections and publicizes information regarding those who violate federal campaign finance laws. In order to assess whether an individual or entity is complying with
federal campaign finance law, CfA needs the information contained in disclosure reports
political committees must file pursuant to the FECA, 52 U.S.C. § 30104(a)&(b); 11 C.F.R. §§
104.1, 104.3. CfA is hindered in its programmatic activity when an individual or entity fails to
disclose campaign finance information in reports required by the FECA.

4. CfA relies on the FEC’s proper administration of the FECA’s reporting requirements
because the FECA-mandated disclosure reports are the only source of information CfA can use
to determine if an individual or entity is complying with the FECA. The proper administration
of the FECA’s reporting requirements includes mandating that all disclosure reports required by
the FECA are properly and timely filed with the FEC. CfA is hindered in its programmatic
activity when the FEC fails to properly administer the FECA’s reporting requirements.

5. Complainant Daniel E. Stevens is the executive director of Campaign for Accountability,
a citizen of the United States, and a registered voter and resident of the District of Columbia. As
a registered voter, Mr. Stevens is entitled to receive information contained in disclosure reports
required by the FECA, 52 U.S.C. § 30104; 11 C.F.R. §§ 104.1, 104.3. Mr. Stevens is harmed
when an individual, candidate, political committee, or other entity fails to report campaign
finance activity as required by the FECA. See FECA v. Akins, 524 U.S. 11, 19 (1998), quoting
Buckley v. Valeo, 424 U.S. 1, 66-67 (1976)(political committees must disclose contributors and
disbursements to help voters understand who provides which candidates with financial support).
Mr. Stevens is further harmed when the FEC fails to properly administer the FECA’s reporting
requirements, limiting his ability to review campaign finance information.

Respondents

6. Mike Crapo for U.S. Senate, FEC Identification Number C00330886, is the principal
campaign committee for Senator Mike Crapo (R-Id).
7. Freedom Fund, FEC Identification Number C00390674, is a nonconnected committee and leadership PAC. Senator Mike Crapo is the leadership PAC’s sponsor.

8. Idaho Conservative Growth Fund, FEC Identification Number C00544270, is a nonconnected committee and leadership PAC. Senator Mike Crapo is the leadership PAC’s sponsor. Freedom Fund and Idaho Conservative Growth Fund are affiliated committees.

9. 223 C Street, LLC is a District of Columbia limited liability company that owns a condominium located at 223 C Street, N.E., Washington, D.C., 20002 for the purpose of generating rental income. See 223 C Street, LLC, Articles of Organization for Domestic Limited Liability Company (June 15, 2012) (attached as Exhibit A).

10. Vicki Hart was the organizer of 223 C Street, LLC and has been the governor of 223 C Street, LLC since its inception. Exhibit A; see also 223 C Street, LLC, Two-Year Report for Domestic & Foreign Filing Entity (February 26, 2017) (attached as Exhibit B).

Factual Allegations

12. Despite the fact that at least six fundraising events were held by the Crapo committees at
the 223 C Street, N.E. condominium during 2017, none of the Crapo committees reported any
disbursements to 223 C Street, LLC for rent for the use of the condominium on any of the reports
the Crapo committees filed with Commission. In addition, none of the Crapo committees
reported receiving an in-kind contribution of the use of the condominium from 223 C Street,
LLC or Vicki Hart as the Governor of 223 C Street, LLC. See Mike Crapo for U.S. Senate, FEC
Form 3X, April 15th Quarterly Report (April 14, 2017); Mike Crapo for U.S. Senate, FEC Form
3X, July 15th Quarterly Report (July 14, 2017); Mike Crapo for U.S. Senate, FEC Form 3X,
October 15th Quarterly Report (October 13, 2017); Mike Crapo for U.S. Senate, FEC Form 3X,
Year-End Report (January 31, 2018); Freedom Fund, FEC Form 3X, Pre-Special Report
Amended (August 2, 2017); Freedom Fund, FEC Form 3X, Mid-Year Report (July 24, 2017);
Freedom Fund, FEC Form 3X, Year-End Report (January 31, 2018); Idaho Conservative
Growth Fund, FEC Form 3X, Mid-Year Report (July 21, 2017) and Idaho Conservative Growth
Fund, FEC Form 3X, Year-End Report (January 10, 2018).

COUNT I

13. FECA and FEC regulations require that all political committees, including a federal
candidate’s principal campaign committee and any leadership PACs sponsored by a federal
candidate, disclose any contribution or expenditure with an aggregate value in excess of $200.
14. Because Mike Crapo for U.S. Senate, Freedom Fund and Idaho Conservatives Fund failed to report any in-kind contributions from, or disbursements to, 223 C Street, LLC or Vicki Hart, as Governor of 223 C Street, LLC, for rent for the use of the 223 C Street, N.E. condominium for the six fundraising events that were held there in 2017, Mike Crapo for U.S. Senate, Freedom Fund and Idaho Conservative Fund may have violated 52 U.S.C. §§ 30104(b)(3)(A) or (5)(A) and 11 C.F.R. §§ 104.3(a)(4)(i) or (b)(3)(i) or (vii).

COUNT II

15. FECA and FEC regulations prohibit corporations from making contributions in connection with any federal election and prohibit any officer or director of any corporation from consenting to any contribution by the corporation in connection with any federal election. 52 U.S.C. § 30118(a); 11 C.F.R. § 114.2(b)(1)&(e). FEC regulations require that limited liability companies like 223 C Street, LLC maybe treated as corporations in certain circumstances and, accordingly, are prohibited from making contributions in connection with any federal election. “An LLC that elects to be treated as a corporation by the Internal Revenue Service, pursuant to 26 CFR 301-7701-3 . . . shall be considered a corporation pursuant to 11 CFR Part 114.” 11 C.F.R. § 110.1(g)(3).

16. Therefore, if 223 C Street, LLC has elected to be treated as a corporation by the Internal Revenue Service, 223 C Street, LLC and Vicki Hart, as Governor of 223 C Street, LLC, may have violated 52 U.S.C. § 30118(a) and 11 C.F.R. § 114.2(b)(1)&(e) by making the 223 C Street, N.E. condominium available to the Crapo committees without charge to be used for multiple fundraising events in 2017.
Conclusion

WHEREFORE, Campaign for Accountability and Daniel E. Stevens request that the Commission investigate whether respondents have violated the FECA and Commission regulations, declare the respondents to have violated the FECA and applicable Commission regulations, impose sanctions for these violations and take such further action as may be appropriate.

ON BEHALF OF COMPLAINTS

Daniel E. Stevens
Executive Director
Campaign for Accountability
611 Pennsylvania Avenue, S.E.
Suite 337
Washington, D.C. 20003
(202) 780-5750 (phone)
Verification

Campaign for Accountability and Daniel Stevens hereby verify that the statements made in the attached Complaint are, upon information and belief, true.

Sworn to pursuant to 18 U.S.C. § 1001.

[Signature]

Daniel Stevens

District of Columbia: SS
SUBSCRIBED AND SWORN to before me this __ day of April, 2018.

[Signature]

Notary Public

My Commission Expires:

August 14, 2022
EXHIBIT A
GOVERNMENT OF THE DISTRICT OF COLUMBIA
DEPARTMENT OF CONSUMER AND REGULATORY AFFAIRS
CORPORATIONS DIVISION

CERTIFICATE

THIS IS TO CERTIFY that all applicable provisions of the District of Columbia Business Organizations Code have been complied with and accordingly, this CERTIFICATE OF ORGANIZATION is hereby issued to:

223 C STREET, LLC

Effective Date: 6/26/2012

IN WITNESS WHEREOF I have hereunto set my hand and caused the seal of this office to be affixed as of 6/26/2012 3:38 PM

Business and Professional Licensing Administration

[Signature]

PATRICIA E. GRAYS
Superintendent of Corporations
Corporations Division

Vincent C. Gray
Mayor

Tracking #: uTXSLDeV
District of Columbia Government  
Department of Consumer and Regulatory Affairs  
Corporation Division  
1100 4th Street, SW  
Washington, DC 20024  

BILLING VOUCHER  

Charge To: 223 C STREET, LLC  

<table>
<thead>
<tr>
<th>Charge For</th>
<th>QTY</th>
<th>Price</th>
</tr>
</thead>
<tbody>
<tr>
<td>3 Day Expedite Services</td>
<td>1</td>
<td>$50.00</td>
</tr>
<tr>
<td>LLC Initial Domestic</td>
<td>1</td>
<td>$220.00</td>
</tr>
</tbody>
</table>

Date: 6/26/2012  
PAY THIS AMOUNT PAYABLE TO THE D.C. TREASURER $270.00  

Government of the District of Columbia - Office of the Chief Financial Officer  

Returned Check Fee - $65.00 - DCMR § 1-108  

All checks returned are subject to electronic representment along with a $65.00 fee.
# Corporation Articles of Organization

**Department of Consumer & Regulatory Affairs**  
**District of Columbia Government**

**Corporations Division**

**Articles of Organization for Domestic Limited Liability Company**  
**Form DLC-1, Version 3, January 2012**

One or more persons acting as the organizers under the provisions of the Title 29 of D.C. Code (Business Organizations Act) adopt the following Articles of Organization:

| **1. Company name:** | 223 C STREET, LLC |

| **2. The street address of the initial principal office:** | 3823 Fordham Street NW, Washington DC 20016 |

| **3. Registered agent's name and address in the District of Columbia:** | C T Corporation System, 1015 15th Street, N.W., Suite 1000 Washington, D.C. 20005 |

| **4. The company will have one or more series that is treated as a separate entity which limits the debts, obligations, and other liabilities to the assets of a particular series as provided in the operating agreement as authorized by § 29-802.06:** | **No** ✔ **Yes** |

| **4A. The limited liability company has at least one member:** | ✔ |

| **4B. The date on which a person or persons became the company's initial member or members:** | June 15, 2012 |

| **5. Effective date:** | Date of acceptance of Articles of Organization |

| **6. Miscellaneous provisions. (may attach the statement)** |

---

**Note:** If you sign this form you agree that anyone who makes a false statement can be punished by criminal penalties of a fine up to $1000, imprisonment up to 180 days, or both, under D.C. Code § 22-2405.

| **7. Organizers Name & Address:** | Vicki Hart |

| **7A. Organizers Signature and Date:** | [Signature] 4/16/12 |

---

Please check dora.dc.gov to view organizations required to register, to search business names, to get step-by-step guidelines to register an organization, to search registered organizations, and to download forms and documents. Just click on "Corporate Registrations."
EXHIBIT B
GOVERNMENT OF THE DISTRICT OF COLUMBIA
DEPARTMENT OF CONSUMER AND REGULATORY AFFAIRS
CORPORATIONS DIVISION

CERTIFICATE

THIS IS TO CERTIFY that the attached is a true and correct copy of the documents for this entity as shown by the records of this office.

223 C STREET, LLC

IN TESTIMONY WHEREOF I have hereunto set my hand and caused the seal of this office to be affixed as of 4/5/2018 1:30 PM

Business and Professional Licensing Administration

PATRICIA E. GRAYS
Superintendent of Corporations
Corporations Division

Muriel Bowser
Mayor

Tracking #: JwPZ4Y6

Scanned by CamScanner
DEPARTMENT OF CONSUMER & REGULATORY AFFAIRS
District of Columbia Government
Corporations Division

Two-Year Report for Domestic & Foreign Filing Entity

Year of Filing: 2017
File Number: L00004580855
Date of Filing: 2/26/2017 7:11 AM
Filing Fee: $300.00

First: Entity Name:
223 C STREET, LLC

Second: Organized under the laws of which state or country:
District of Columbia

Third: Address of principal office:
3823 FORDHAM STREET NW
WASHINGTON, District of Columbia 20016

Fourth: Name of Registered Agent and address of registered office in DC:
C T CORPORATION SYSTEM
1015 15th St NW
Suite 1000
Washington, District of Columbia 20005

Fifth: Brief statement of business affairs conducted in DC:
Other
Rental

Sixth: List all entity governors (attach list if needed):

<table>
<thead>
<tr>
<th>Name</th>
<th>Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>VICKI HART</td>
<td>3823 FORDHAM ST., N.W., WASHINGTON, District of Columbia 20016</td>
</tr>
</tbody>
</table>

Seventh: Is foreign filing entity in good standing in state / country where it is organized?

Eighth: Name of the Governor or Authorized Person:
No information provided.

If you sign this form you agree that anyone who makes a false statement can be punished by criminal penalties of a fine up to $1000, imprisonment up to 180 days, or both, under DCOC § 22-2405;

E-Signed
GOVERNMENT OF THE DISTRICT OF COLUMBIA
DEPARTMENT OF CONSUMER AND REGULATORY AFFAIRS
CORPORATIONS DIVISION

CERTIFICATE

THIS IS TO CERTIFY that the attached is a true and correct copy of the documents for this entity as shown by the records of this office.

223 C STREET, LLC

IN TESTIMONY WHEREOF I have hereunto set my hand and caused the seal of this office to be affixed as of 4/5/2018 1:30 PM

Business and Professional Licensing Administration

[Signature]

PATRICIA E. GRAYS
Superintendent of Corporations
Corporations Division

Muriel Bowser
Mayor

Tracking #: JwPZi4Y6

Scanned by CamScanner
Two-Year Report for Domestic & Foreign Filing Entity

Year of Filing: 2015

File Number: L00004580855

Date of Filing: 10/17/2016 3:15 PM

Filing Fee: $400.00

First: Entity Name:
223 C STREET, LLC

Second: Organized under the laws of which state or country:
District of Columbia

Third: Address of principal office:
3823 FORDHAM STREET NW
WASHINGTON, District of Columbia 20016

Fourth: Name of Registered Agent and address of registered office in DC:
C T CORPORATION SYSTEM
1015 15th St NW
Suite 1000
Washington, District of Columbia 20005

Fifth: Brief statement of business affairs conducted in DC:
Other
Rental

Sixth: List all entity governors (attach list if needed):

<table>
<thead>
<tr>
<th>Name</th>
<th>Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>VICKI HART</td>
<td>3823 FORDHAM ST., N.W., WASHINGTON, District of Columbia 20016</td>
</tr>
</tbody>
</table>

Seventh: Is foreign filing entity in good standing in state / country where it is organized?

Eighth: Name of the Governor or Authorized Person:
No information provided.

If you sign this form you agree that anyone who makes a false statement can be punished by criminal penalties of a fine up to $1000, imprisonment up to 180 days, or both, under DCOC § 22-2405;

E-Signed
GOVERNMENT OF THE DISTRICT OF COLUMBIA
DEPARTMENT OF CONSUMER AND REGULATORY AFFAIRS
CORPORATIONS DIVISION

CERTIFICATE

THIS IS TO CERTIFY that the attached is a true and correct copy of the documents for this entity as shown by the records of this office.

223 C STREET, LLC

IN TESTIMONY WHEREOF I have hereunto set my hand and caused the seal of this office to be affixed as of 4/5/2018 1:30 PM

Business and Professional Licensing Administration

PATRICIA E. GRAYS
Superintendent of Corporations
Corporations Division

Muriel Bowser
Mayor

Tracking #: JwPZ14Y6
Two-Year Report for Domestic & Foreign Filing Entity

Year of Filing: 2013
File Number: L00004580855
Date of Filing: 10/17/2016 3:08 PM
Filing Fee: $400.00

First: Entity Name:
223 C STREET, LLC

Second: Organized under the laws of which state or country:
District of Columbia

Third: Address of principal office:
3823 FORDHAM STREET NW
WASHINGTON, District of Columbia 20016

Fourth: Name of Registered Agent and address of registered office in DC:
C T CORPORATION SYSTEM
1015 15th St NW
Suite 1000
Washington, District of Columbia 20005

Fifth: Brief statement of business affairs conducted in DC:
Other
Rental

Sixth: List all entity governors (attach list if needed):

<table>
<thead>
<tr>
<th>Name</th>
<th>Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>VICKI HART</td>
<td>3823 FORDHAM ST., N.W., WASHINGTON, District of Columbia 20016</td>
</tr>
</tbody>
</table>

Seventh: Is foreign filing entity in good standing in state / country where it is organized?

Eighth: Name of the Governor or Authorized Person:
No information provided.

If you sign this form you agree that anyone who makes a false statement can be punished by criminal penalties of a fine up to $1000, imprisonment up to 180 days, or both, under DCOC § 22-2405;

Signed
EXHIBIT C
UPSTAIRS, DOWNSTAIRS

EPA Administrator Scott Pruitt's Lobbyist-Owned Pad Was GOP Fundraising Hub

Republican lawmakers raised money downstairs, while the EPA administrator lived upstairs in his rented lobbyist-owned townhouse.

LACHLAN MARKAY, SAM STEIN 04.02.18 8:09 PM ET
The lobbyist-owned townhouse that EPA Administrator Scott Pruitt rented for relatively small nightly sums also served as a hub for Republican lawmakers hoping to raise money for their congressional campaigns.

A review of fundraising invitations reveals that at least three members of Congress had fundraisers at the now-controversial Capital Hill brownstone during the same period of time that Pruitt was living there. Several of those fundraisers took place on dates when Pruitt was in Washington, D.C., according to a cross-reference of the invitations and Pruitt’s schedule.

The EPA said that Pruitt wasn’t invited to and didn’t attend any of the events. And even if he were to have attended, ethics laws do not prohibit a cabinet secretary from going to a political event in his or her personal time.
over how the EPA chief conducted himself upon arriving in Washington.

“Nothing says ‘the swamp’ like corporate lobbyists holding high-dollar fundraisers in a luxury Capitol Hill condo,” said Brendan Fischer, the director of federal reform programs at the Campaign Legal Center, a nonprofit ethics group. “The fact that a senior member of the administration is staying in a lobbyist’s fundraiser den when he isn’t flying first class on the taxpayer dime might say something about President Trump’s commitment to his ‘Drain the Swamp’ pledge.”

The townhouse at 223 C Street, NE, is owned by Vicki Hart and her husband J. Steven Hart, who chairs one of D.C.’s major lobbying firms and represents, among other clients, major energy companies. According to ABC News, Pruitt lived at the address during the spring and early summer of 2017, paying a rate of $50-a-night—well below a standard fare for someone renting out prime real estate on the Hill.

The EPA says the relationship was entirely above board. A spokesperson for the agency provided a memo from its chief ethics attorney, who reviewed the arrangement retroactively and found that it fully complied with relevant laws and regulations. But the White House said on Monday that it was conducting its own review of the practice to ensure it was above board, according to a Wall Street Journal report.

**RELATED IN POLITICS**

Third GOP Member of Congress Calls for Pruitt’s Resignation

Is the EPA’s Scott Pruitt Too Crooked to Fail?

Pruitt Hangs On, and Hopes Kelly Overplayed His Hand

During those months that Pruitt stayed in the house—from March through July, according to records reported by Bloomberg—political action committees associated with several members of Congress held fundraisers at 223 C Street, NE as well. They include Sen. Mike Crapo (R-ID), who hosted, what appears to be, monthly luncheons. A request for comment made to Crapo’s Freedom Fund was not returned. Rep. Bill Huizenga (R-MI) held a breakfast fundraiser at the townhouse on March 9, 2017. A treasurer for “Huizenga for Congress” did not return a request for comment. And Save America PAC, the political action committee for Sen. Jim Risch (R-ID), also held an event at the house in mid-July,
A request for comment made to Steven Hart’s office was not returned.

Pruitt was in Washington, D.C., on the same day of at least three of the Crapo fundraisers (he was in Oklahoma for a fourth). He was in Little Rock, Arkansas, on the date of the Risch fundraiser and in Houston during the Huizenga event (his publicly released schedule does not go back that far). Though the events took place at his residence, most of them were in the middle of the day which would have made it difficult for Pruitt to have attended.

Pruitt was out of town for some of the events, and might not have even known they were taking place. But Fischer insists that that’s almost beside the point.

“Even if that is true,” he said, “the fact that fundraisers were a common occurrence is a reminder that Pruitt was getting a sweet deal on a luxury condo from a couple whose job is influence-peddling.”
EXHIBIT D
Upcoming Events
Memo -Changes and Additions-

May 4, 2017

Please send all changes and additions by 12:00 PM on
Friday, May 5th, 2017

2017 Senator Events

Wednesday, May 24, 2017
SENATOR MIKE CRAPO (R-ID)
Lunch: 12:00-1:00pm
Location: 223 C Street NE; Unit B
Cost: $2,500 PAC/$1,000 Individual
RSVP: Amy Mathis at amy@brcs-dc.com or 703-566-8267

Wednesday, June 28, 2017
SENATOR MIKE CRAPO (R-ID)
Lunch: 12:00-1:00pm
Location: 223 C Street NE; Unit B
Cost: $2,500 PAC/$1,000 Individual
RSVP: Amy Mathis at amy@brcs-dc.com or 703-566-8267

Thursday, July 27, 2017
SENATOR MIKE CRAPO (R-ID)
Lunch: 12:00-1:00pm
Location: 223 C Street NE; Unit B
Cost: $2,500 PAC/$1,000 Individual
RSVP: Amy Mathis at amy@brcs-dc.com or 703-566-8267

Wednesday, September 27, 2017
SENATOR MIKE CRAPO (R-ID)
Lunch: 12:00-1:00pm
Location: 223 C Street NE; Unit B
Cost: $2,500 PAC/$1,000 Individual
RSVP: Amy Mathis at amy@brcs-dc.com or 703-566-8267

Wednesday, October 25, 2017
SENATOR MIKE CRAPO (R-ID)
Lunch: 12:00-1:00pm
Location: 223 C Street NE; Unit B
Cost: $2,500 PAC/$1,000 Individual
RSVP: Amy Mathis at amy@brcs-dc.com or 703-566-8267

Thursday, November 30, 2017
SENATOR MIKE CRAPO (R-ID)
Lunch: 12:00-1:00pm
Location: 223 C Street NE; Unit B
Cost: $2,500 PAC/$1,000 Individual
RSVP: Amy Mathis at amy@brcs-dc.com or 703-566-8267