

**COMPLAINT BEFORE THE FEDERAL ELECTION COMMISSION
OFFICE OF THE GENERAL COUNSEL**

MUR # 6849

RECEIVED
FEDERAL ELECTION
COMMISSION
2014 JUN 27 AM 11:29
OFFICE OF GENERAL
COUNSEL

RESPONDENTS:

Todd Tiahrt, candidate for Congress, 4th District of Kansas ("Tiahrt")
Willis "Wink" Hartman, Founder/Treasurer, Kansans for Responsible Government ("Hartman")
Michael O'Donnell, Communications Director for Hartman Oil Company ("O'Donnell")
Kansans for Tiahrt, official campaign committee for Todd Tiahrt ("Tiahrt Committee")
Kansans for Responsible Government, Super PAC ("Hartman PAC")

INTRODUCTION:

The Respondents have committed, and continue to commit, multiple violations of the Federal Election Campaign Act of 1971 (as amended) and related Federal Election Commission Regulations. Specifically, the Respondents have engaged in the dissemination of coordinated communications amounting to in-kind contributions and expenditures in excess of the Federal Election Campaign Act's limitations on contributions to federal election candidates. In addition, these individuals and entities have failed to comply with the relevant reporting requirements.

FACTS:

1. Tiahrt served as Congressman for the 4th District of Kansas for 16 years. Subsequent to his tenure in Congress, Tiahrt established a consulting firm, Todd Tiahrt, LLC, with offices in Alexandria, Virginia, and Wichita, Kansas. Tiahrt's Wichita office is located in the Hartman Oil Building owned by Hartman, and from which Hartman leads his business enterprises. In fact, Tiahrt's office – Suite 100A – is physically *inside* Hartman's offices in Suite 100.
2. Hartman, the President of Hartman Oil and other successful ventures, ran unsuccessfully for Congress in 2010 when he was defeated by the sitting Member from the 4th District of Kansas, Mike Pompeo ("Pompeo").
3. In January of 2014, Hartman and his wife hosted a reception for Tiahrt during the Kansas Republican Party's Kansas Day Activities. Those attending the reception were led to believe that Tiahrt would challenge incumbent Pompeo for the seat.

4. On May 13, 2014, a Statement of Organization was filed with the Commission establishing Hartman's PAC, the stated purpose of which is "to raise funds in unlimited amounts" and a declaration that "those funds will not be used to make in-kind contributions to federal candidates or engage in coordinated communications relating to federal candidates." The declaration was signed by the Treasurer – Hartman.
5. On May 29, 2014, Tiahrt announced his candidacy for 4th District Congress. He was introduced by Zoe Newton, former General Counsel for Hartman Companies, another entity owned by Hartman.
6. On May 30, 2014, Tiahrt officially filed with the Kansas Secretary of State's office for the August 5, 2014 primary election.
7. On June 5, 2014, the Tiahrt Committee officially registered with the Federal Election Commission, naming George Bruce as Treasurer. George Bruce is also listed as the Registered Agent for Todd Tiahrt, LLC.
8. Hartman has made contributions to Tiahrt in past election efforts.
9. As disclosed on the June 4, 2014, 48-hour independent expenditure report with the Federal Election Commission on behalf of the Hartman PAC, an expenditure of \$15,500.00 was made on June 2, 2014, in support of Tiahrt. This amount was paid to Strategic Media Services in Arlington Virginia for the purpose of "advertising production and placement."
10. Also on June 2, 2014, Hartman sent an e-mail to various supporters inviting them to a fundraiser on behalf of Tiahrt at Chester's Chophouse, a restaurant in which Hartman has majority ownership.
11. On June 4, 2014, Hartman hosted a radio show on a local radio station KQAM 1480 AM in which he expressed his strong support for Tiahrt. KQAM programming includes a series of afternoon drive time radio shows including "Tuesdays with Todd" hosted by Tiahrt and "Wednesdays with Wink" hosted by Hartman.
12. According to reliable information from local Wichita radio executives, O'Donnell, acting as Director of Communications for Hartman Oil Company, Inc. – another Hartman business – brokered the deal with KQAM to establish the talk shows for Tiahrt and Hartman.

13. O'Donnell is a direct employee of Hartman and previously served as deputy campaign manager for Hartman's 2010 unsuccessful campaign against Pompeo.
14. On Tuesday, June 10, 2014, Tiahrt hosted a radio show on KQAM in which Jim Anderson was a special guest, and during which, they discussed issues pertinent to the upcoming Congressional campaign. Jim Anderson is the owner of the PostNet franchise at which the Hartman PAC maintains a mail box which is listed with the FEC as the primary mailing address for the Hartman PAC.
15. O'Donnell has been instrumental in securing radio and TV broadcast appearances and advertising spots on behalf of Tiahrt, Hartman, and Hartman's PAC. During the efforts to secure these broadcast times, O'Donnell has identified himself to local broadcasting stations as representing Hartman as the marketing director, and Hartman's PAC. This information has been obtained from various media executives in Wichita, Kansas.
16. In the weeks leading up to Tiahrt's announcement of his candidacy, O'Donnell acted to facilitate Tiahrt's public appearances and to support and promote Tiahrt's candidacy, as follows:
- a. On April 14, 2014, O'Donnell and Tiahrt arrived together and attended a local Republican Party meeting, including "working the room" together;
 - b. On May 3, 2014, O'Donnell accompanied Tiahrt when Tiahrt spoke at the "Kansans for Liberty" campaign kick-off event;
 - c. On May 5, 2014, O'Donnell travelled with Tiahrt to a Town Hall Meeting in Winfield, Kansas, and adjourned with Tiahrt for dinner after the event;
 - d. On May 16, 2014, O'Donnell attended the Wichita Pachyderm meeting with Tiahrt, and asked a strategic question which gave Tiahrt the opening to address campaign issues and themes; and
 - e. On May 22, 2014, Tiahrt and O'Donnell worked the room together at the Sedgwick County Republican Party meeting.
17. On or about June 4, 2014, O'Donnell re-published public communications critical of Pompeo on his Twitter account, which identifies O'Donnell as Director of Marketing of Hartman Companies.

18. Since June 2, 2014, the Tiahrt Committee and the Hartman PAC have publically promoted Tiahrt for Congress with coordinated themes and messages, which are best illustrated in the chart below:

Tiahrt Committee through the campaign website (www.toddtiahrt.com)	Hartman PAC Radio commercial
Entitled " Character Counts "	Radio ad: "The [Candidate] we can <i>trust</i> ."
Website claims Tiahrt is a proven conservative	Radio ad: Tiahrt is a " True Conservative "
Website references outsourcing of aviation jobs to Brazil	Radio ad: Tiahrt fought to protect our jobs from being outsourced to Brazil
Website tells of Pompeo's supposed support for bills funding Obamacare	Radio ad: Tiahrt "knows we must stop Obamacare " and "won't compromise until [Obamacare] is repealed Push Poll: deceptively reports Pompeo voted seven times to fund Obamacare
Website touts Tiahrt's opposition to NSA surveillance	Radio ad: Tiahrt "won't allow the government to spy on its citizens "
Website proclaims Tiahrt as pro-life	Radio ad: Boasts of pro-life record

19. As of the date of this complaint, the Hartman PAC had not reported any expenditure for "Public Opinion polling" or anything other category under which the push poll might fall.
20. The Hartman PAC runs the following disclaimer at the end of its radio commercial: "*Kansans for Responsible Government is responsible for the content of this advertising. Paid for by Kansans for Responsible Government and not authorized by any candidate or candidate's committee.*" They do not reveal the permanent street address, telephone number, or URL address of those responsible for paying for the advertisement.
21. On June 24, 2014, the Tiahrt Committee sent an email to its email distribution list encouraging supporters to display yard signs for Tiahrt. Two addresses were given from which to obtain yard signs: the Tiahrt Committee headquarters at 8000 West Central, Wichita, Kansas; and the PostNet facility owned by Jim Anderson at 11310 East 21st Street North, Wichita, Kansas – the same address as the primary mailing address of the Hartman PAC.

ANALYSIS:

The extent and nature of the connections between Tiahrt and Hartman, who serves as treasurer of a Hartman PAC is more than troubling -- it smacks of unlawful coordination between the

candidate and the supposedly independent political action committee in an attempt to circumvent federal campaign finance laws.

Hartman or his agent O'Donnell have acted at every step to aid, facilitate and promote Tiahrt's candidacy. They have reserved broadcast spots well in advance of any public indication that Tiahrt was doing more than considering entering the race; they have promoted Tiahrt through lavish receptions; acted as a media purchasing agent to procure advertising and other broadcast opportunities; assisted and facilitated Tiahrt's public appearances, and publically supported and promoted Tiahrt's candidacy and arranged campaign appearances and fundraisers on behalf of Tiahrt.

Within weeks of Tiahrt's announcement of his candidacy, Hartman formed the Hartman PAC and named himself as treasurer. With precise timing centered on Tiahrt's formal entry into the race, Hartman authorized the disbursement of funds through the Hartman PAC to pay for the creation, production and distribution of advertisements supporting Tiahrt's candidacy and echoed -- if not republished in literal terms -- the Tiahrt Committee's materials in the form of themes and messages. These radio commercials started to run almost immediately upon the disbursement of the funds which suggests that the creation and the production had already been completed and the avenues of dissemination already secured. In addition, the Hartman PAC followed up on their radio campaign with a misleading push poll campaign which specifically reinforced the Tiahrt Committee claim that Pompeo supported the funding of Obamacare.

The radio commercials purchased, produced, created and disseminated by the Hartman PAC are coordinated communications within the meaning of 11 CFR 109.21 et al.

The communications satisfy several of the content standards and conduct standards set forth by 11 CFR 109.21 (c) and (d):

A public communication which disseminates, distributes or re-publishes campaign material prepared by a candidate. 11 C.F.R. Section 109.21(c)(2).

The radio advertisements produced and funded by the Hartman PAC re-publish, distribute and disseminate the themes and messages of the Tiahrt Committee, thereby creating an echo chamber in which the substance and essence of the public statements of the campaign are re-published.

A public communication which expressly advocates the election of a clearly identified candidate for federal office. 11 C.F.R. Section 109.21 (c) (3)

The radio advertisement produced and funded by the Hartman PAC clearly and expressly advocates the election of Tiahrt to United States Congress. There is an identification that he is running for office, a strongly stated favorable expression of his views, positions and campaign talking points in the context of the need for someone with such views representing "us" in Congress. The commercial leaves no doubt that it is a political advertisement urging the election of Tiahrt to Congress.

A public communication which refers to a clearly identified House or Senate Candidate and is publically disseminated in the candidate's jurisdiction 90 days or fewer before the candidate's primary election. 11 C.F.R. Section 109.21 (c)(4)(i)

The primary election in Kansas will be held on August 5, 2014. The Hartman PAC commercials were broadcast on KNSS Radio (which covers most if not all of the 4th District of Kansas) as late as June 11, 2014 -- well within 90 days before the election.

A public communication which is the functional equivalent of express advocacy for the purpose of appealing to vote for or against a clearly identified federal candidate. 11 C.F.R. Section 109.21 (c)(5).

The content of the radio commercial leaves no doubt that it is appealing to people to vote for Tiahrt. As such, the communication is the functional equivalent of express advocacy. Further, the recent distribution of Tiahrt Committee yard signs from a location which is also identified as the Hartman PAC official address leaves little doubt that the Hartman PAC and the Tiahrt Committee are working hand-in-hand, coordinated by Hartman, Tiahrt, O'Donnell, and possibly Jim Anderson.

The commercial satisfies several of the Conduct standards including:

The communication is created, produced, or disseminated at the request or suggestion of a candidate (or agent thereof); or at the suggestion of the person paying for the communication but with the assent of a candidate. 11 C.F.R. Section 109.21 (d)(1)(i and ii).

Hartman authorized the disbursement of funds, production and dissemination of the commercial and the push poll. Further, O'Donnell facilitated the media buys on behalf of Tiahrt and the Hartman PAC. Hartman and O'Donnell stand in the place of the candidate when ordering and paying for the communication.

The candidate, authorized committee or agent thereof is materially involved in decisions regarding the content of the communication, the means or mode of the communication, the intended audience, the specific media outlet used, and the timing or frequency of the communication. 11 C.F.R. Section 109.21(d)(2)

O'Donnell, as a direct employee of Hartman, and Hartman, in his capacity as treasurer of the Hartman PAC, were materially involved in the decision regarding the content of the communication, the means or mode of the communication, the intended audience and all aspects of the creation, production and dissemination of the communication. O'Donnell clearly acted as an agent of the Tiahrt Committee for the purposes of promoting Tiahrt's candidacy for Congress.

The communication is created, produced or distributed after one or more substantial discussions about the communication between the person paying for the communication (or their agents) and the candidate, candidate's committee or their agents. A discussion is substantial if it is information about the candidate's plans, projects, activities or needs is conveyed to a person paying for the communication and the information is material to the creation, production or distribution of the communication. 11 C.F.R. Section 109.21 (d)(3)

The close timing between the launch of the Tiahrt congressional campaign, the disbursement of funds by Hartman for the purpose of creating and distributing the commercial, and the actual broadcast of these commercials indicate that discussions between Tiahrt and Hartman (or their surrogates) have occurred regularly. Moreover, the similarity in message and theme between the Hartman PAC's advertisement and push poll, and that of the public statements of the campaign indicate that discussion between Hartman and Tiahrt (or their surrogates) included an exchange of information between the Tiahrt Committee and the Hartman PAC.

The expenditure by the Hartman PAC is equivalent to an in-kind contribution in excess of the limits on contribution to federal candidates.

Communications which are "coordinated" with a candidate or candidate committee will be deemed in kind contributions subject to the campaign finance limitations and reporting requirements of the Federal Elections Campaign Act of 1971 (as amended). 11 C.F.R. Section 109.21 (b) (1) and (3). As seen above, the commercial paid for by Hartman PAC amounts to a coordinated communication. While such communications are not prohibited per se, they are considered to be an in-kind contribution to the Tiahrt Committee by the "Hartman PAC" and/or Hartman. As such, both the Tiahrt

Committee and the Hartman are required to abide by Federal campaign finance laws relating to the limits on such contributions and the reporting of such contributions.

In this instance, the cost of creating, producing and disseminating this commercial amounted to \$15,500.00 thus far. This greatly exceeds the \$2,600.00 limit on contributions to federal candidates creating an unlawful contribution of \$12,900.00. Further, there is no evidence that Hartman, Hartman's PAC, or the Tiahrt Committee filed the necessary report disclosing the excess contribution.

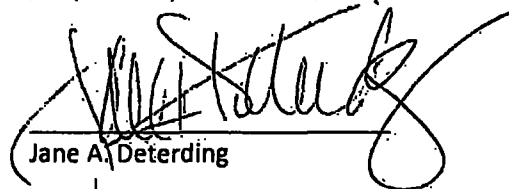
The Hartman PAC's radio Commercial violates Federal Election law relating to the disclosure of the source of the communication.

As noted above, the disclaimer on the radio advertisement fails to reveal the appropriate contact information, thus the broadcast of the commercials is unlawful.

CONCLUSION:

Based on the actions by Tiahrt, Hartman, O'Donnell, the Tiahrt Committee, and the Hartman PAC, an immediate cease and desist order to each Respondent is respectfully requested. The actions warrant an investigation and appropriate injunctions, fines or other penalties as deemed appropriate.

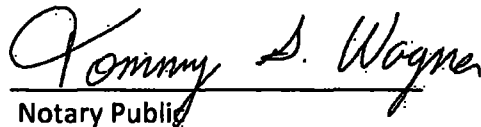
Respectfully submitted,

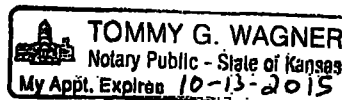


Jane A. Deterding

Colwich, KS 67030

Subscribed and sworn before me on this 26 day of June, 2014.


Notary Public



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Michael O'Donnell, Communications Directors for Hartman Oil Company ("O'Donnell")

Kansans for Tiahrt, official campaign committee for Todd Tiahrt ("Tiahrt Committee")

Kansans for Responsible Government, Super PAC ("Hartman PAC")

Exhibit list:

Exhibit #	Description
1	Kansas Secretary of State Business Entity search, Todd Tiahrt LLC
2	Todd Tiahrt LLC website/ office in Hartman building
3	2010 Election results
4	Photograph of Kansas Day Reception poster
5	Hartman PAC Statement of Organization
6	Text of Tiahrt announcement speech
7	LinkedIn profile, Zoe Newton
8	FEC filing, Tiahrt Committee formation
9	FEC report, Hartman donations to Tiahrt
10	48-hour expenditure filing, Hartman PAC
11	Email invitation from Hartman to Tiahrt fundraiser
12	LinkedIn Profile, O'Donnell
13	LinkedIn Profile, Jim Anderson
14	Twitter Profile, O'Donnell
15	Twitter posts, O'Donnell
16	Website, Tiahrt Committee, www.toddtiahrt.com
17	Transcript, Hartman PAC radio advertisement
18	FEC filing, Hartman PAC expenditure report
19	Tiahrt Campaign email, 6/24/2014

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BusinessCenter

Simple Steps for Success

Business Entity Search

Be advised the business information on this page is for summary in actual documents filed by customers with the secretary of State's c ensure the correct debtor name.

Business Summary

Current Entity Name

TODD TIAHRT, LLC

[File Name Change Online](#)

Current Mailing Address: TODD TIAHRT - 1329 AMITY GODDARD, KS 67052

Business Entity Type: KANSAS LTD LIABILITY COMPANY

Date of Formation in Kansas: 01/13/2011

State of Organization: KS

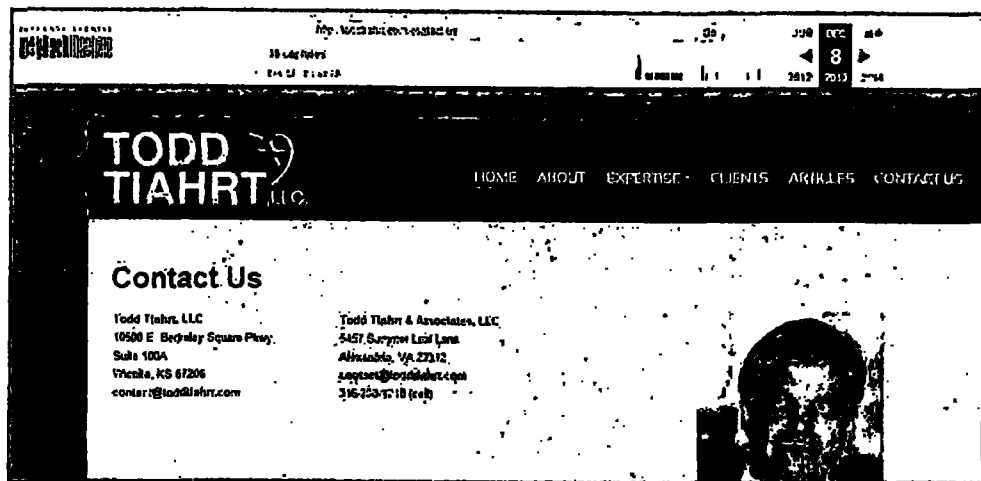
Current Status: ACTIVE AND IN GOOD STANDING

[Certificate of Good Standing](#)

Resident Agent and Registered Office

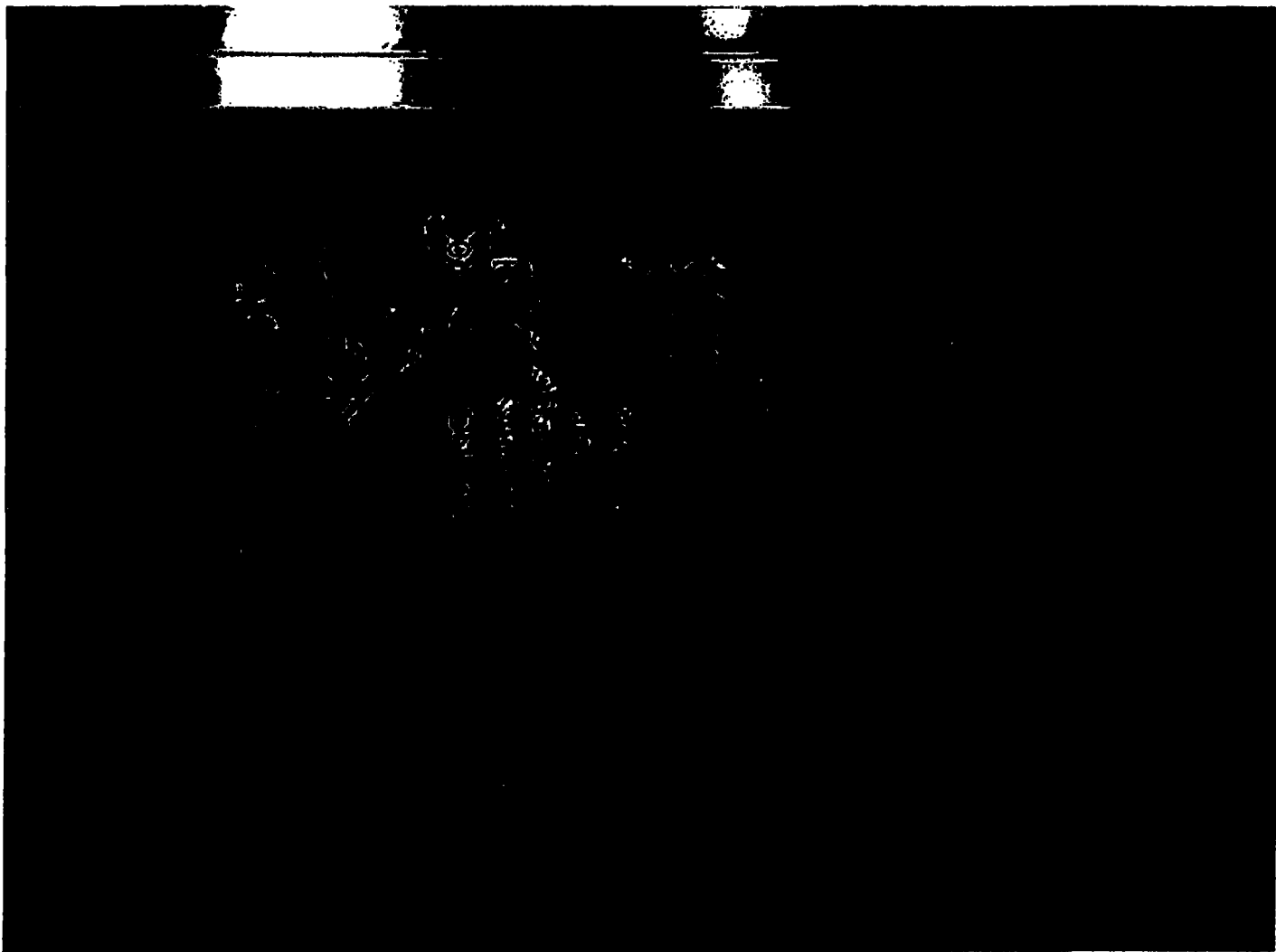
Resident Agent: GEORGE G BRUCE

15044381378



<https://web.archive.org/web/20131208151419/http://toddiahrt.com/contact-us>

1504438579



August 3rd, 2010 Primary Election
Official Results - Sedgwick County

Last updated 8/9/2010 04:13 PM

Listed below is the 2010 Primary Election results for Sedgwick County, Kansas.
You may click on the results to view the precinct by precinct breakdown after the
the election is complete.

PRECINCTS COUNTED - TOTAL

PRECINCTS COUNTED - TOTAL 0251 of 0251

Precinct Reported 0251 ,Eligible Precinct 0251

U. S. Representative 4th District

Jim Anderson	6295 / 12%
Wink Hartman	10927 / 21%
Mike Pompeo	20213 / 40%
Paij Rutschman	823 / 1%
Jean Kurtis Schodorf	11951 / 23%

Precinct Reported 0251 ,Eligible Precinct 0251

**RNC Committeeman
Todd & Vicki Tiahrt's
Kansas Convention
Reception**

Wink and Libba Hartman

Committee Name:

Kansans for Responsible Government

If registered, FEC ID:

Today's Date:

5/7/2014

Federal Election Commission

999 E Street, N.W.

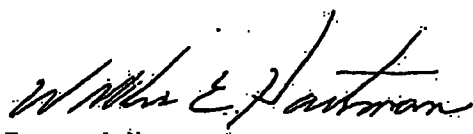
Washington, D.C. 20463

Re: Form 1, Statement of Organization—Unlimited Contributions

To Whom It May Concern:

This committee intends to make independent expenditures, and consistent with the U.S. Court of Appeals for the District of Columbia Circuit decision in *SpeechNow v. FEC*, it therefore intends to raise funds in unlimited amounts. This committee will not use those funds to make contributions, whether direct, in-kind, or via coordinated communications, to federal candidates or committees.

Respectfully submitted,



Treasurer's Name:

Willis Hartman

Treasurer

Exhibit 5

14031234880

NON-RECORDING

FEC
FORM 1

STATEMENT OF
ORGANIZATION

PAGE 1 / 4

RECEIVED

2014 MAY 14 AM 10:34

Office Use Only

1. NAME OF
COMMITTEE (In full)

(Check if name
is changed)

Example: If typing, type
over the lines.

12FE4M5

FEC MAIL CENTER

Kansans for Responsible Government

ADDRESS (number and street)

11310 E. 21st North Suite G

(Check if address
is changed)

PMB #51

Wichita

CITY ▲

KS

STATE ▲

67208

ZIP CODE ▲

COMMITTEE'S E-MAIL ADDRESS

(Check if address
is changed)

fec@kansansforresponsiblegovernment.com

Optional Second E-Mail Address
soleary@gobernillgers.com

COMMITTEE'S WEB PAGE ADDRESS (URL)

(Check if address
is changed)

kansansforresponsiblegovernment.com

2. DATE

05 / 07 / 2014

3. FEC IDENTIFICATION NUMBER ►

C

4. IS THIS STATEMENT

X

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 Willie Hartman

Signature of Treasurer

Willie E. Hartman

Date

05 / 07 / 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
Toll Free 800-424-9530
Local 202-694-1100

FEC FORM 1
(Revised 06/2012)

5. TYPE OF COMMITTEE

Candidate Committee:

- (a) ☐ This committee is a principal campaign committee. (Complete the candidate information below.)
- (b) ☐ This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)

Name of
CandidateCandidate
Party AffiliationOffice
Sought:

House

Senate

President

State

District

- (c) ☐ This committee supports/opposes only one candidate, and is NOT an authorized committee.

Name of
Candidate**Party Committee:**

- (d) ☐ This committee is a ☐ (National, State or subordinate) committee of the ☐ (Democratic, Republican, etc.) Party.

Political Action Committee (PAC):

- (e) ☐ This committee is a separate segregated fund. (Identify connected organization on line 6.) Its connected organization is a:

☐ Corporation☐ Corporation w/o Capital Stock☐ Labor Organization☐ Membership Organization☐ Trade Association☐ Cooperative☐ In addition, this committee is a Lobbyist/Registrant PAC.

- (f) ☒ This committee supports/opposes more than one Federal candidate, and is NOT a separate segregated fund or party committee. (i.e., nonconnected committee)

☐ In addition, this committee is a Lobbyist/Registrant PAC.☐ In addition, this committee is a leadership PAC. (Identify sponsor on line 6.)**Joint Fundraising Representative:**

- (g) ☐ This committee collects contributions, pays fundraising expenses and disburses net proceeds for two or more political committees/organizations, at least one of which is an authorized committee of a federal candidate.
- (h) ☐ This committee collects contributions, pays fundraising expenses and disburses net proceeds for two or more political committees/organizations, none of which is an authorized committee of a federal candidate.

Committees Participating in Joint Fundraiser1. FEC ID number 2. FEC ID number 3. FEC ID number 4. FEC ID number

14031234882

14031234882

Write or Type Committee Name

Kansans for Responsible Government**6. Name of Any Connected Organization; Affiliated Committee, Joint Fundraising Representative, or Leadership PAC Sponsor**

NONE

Mailing Address

CITY

STATE

ZIP CODE

Relationship:

Connected Organization

Affiliated Committee

Joint Fundraising Representative

Leadership PAC Sponsor

7. Custodian of Records: Identify by name, address (phone number -- optional) and position of the person in possession of committee books and records.

Full Name

Shannon O'Leary

Mailing Address

2101 Cedar Springs Rd

Ste 1050

Dallas

TX

75201

Title or Position

CITY

STATE

ZIP CODE

Custodian of Records

Telephone number

8. Treasurer: List the name and address (phone number -- optional) of the treasurer of the committee; and the name and address of any designated agent (e.g., assistant treasurer).Full Name
of Treasurer

Willis Hartman

Mailing Address

10500 E. Berkeley Square Parkway

Ste 100

Wichita

KS

67206

Title or Position
Treasurer

CITY

STATE

ZIP CODE

Telephone number

14031234883

14031234883

Full Name of
Designated
Agent

Shannon O'Leary

Mailing Address

2101 Cedar Springs Rd

Ste 1050

Dallas

CITY

TX

STATE

75201

ZIP CODE

Title or Position

Assistant Treasurer

Telephone number

9. Banks or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of Bank, Depository, etc.

Vintage Bank Kansas

Mailing Address

10500 E. Berkeley Square Parkway

Ste 101

Wichita

CITY

KS

STATE

67208

ZIP CODE

Name of Bank, Depository, etc.

Mailing Address

CITY

STATE

ZIP CODE

14031234884

DOCUMENT 14031234884

fedex

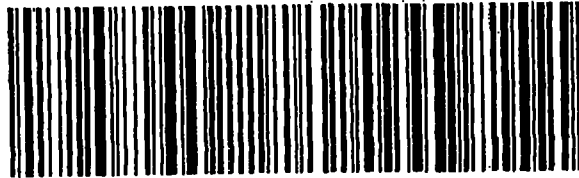
Express

FedEx
TRAFFIC
 8045 9577 3922

WED - 14 MAY 8:30A
 FIRST OVERNIGHT

ISR
 20463
 DC-US
 IAD

X1 RDVA



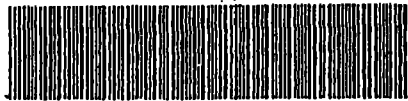
FO

151983 REV 7/00 (R0)

2014 MAY 14 PM 10:00
 FCC MAIL CENTER

FedEx
FIRST OVERNIGHT

Delivery Address
 999 E STREET NW



FedEx First Overnight®

© 2011

4. Adhere pouch to front of packaging away from folds or seams.

For FedEx


14031234885

14031234885

Align

SECRET

14031234886

Federal Election Commission	
ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS	
The FEC added this page to the end of this filing to indicate how it was received.	
<input type="checkbox"/> Hand Delivered	Date of Receipt
<input type="checkbox"/> USPS First Class Mail	Postmarked
<input type="checkbox"/> USPS Registered/Certified	Postmarked (R/C)
<input type="checkbox"/> USPS Priority Mail	Postmarked
<input type="checkbox"/> USPS Priority Mail Express	Postmarked
<input type="checkbox"/> Postmark Illegible	
<input type="checkbox"/> No Postmark	
<input checked="" type="checkbox"/> Overnight Delivery Service (Specify): Fed Ex	Shipping Date 5/13/14
	Next Business Day Delivery <input checked="" type="checkbox"/>
<input type="checkbox"/> Received from House Records & Registration Office	Date of Receipt
<input type="checkbox"/> Received from Senate Public Records Office	Date of Receipt
<input type="checkbox"/> Received from Electronic Filing Office	Date of Receipt
<input type="checkbox"/> Other (Specify):	Date of Receipt or Postmarked
 PREPARER (8/2013)	5/14/14 DATE PREPARED



May 29, 2014

Dear Friends,

Today, I announced my decision to enter the race for Kansas' Fourth District Congressional seat. It was a thoughtful decision based on differences with the current Congressman related to vision, issues, and public service. I have been here before – I have 16 years of experience serving you in Congress and I want to share with you why I am doing this.

A Congressional seat is contract labor. No one is entitled to be a Congressman. No one has a right to be our Representative, it is earned. Every two years the contract expires and it is up to the boss, the voters, to decide whether or not to rehire their Representative. Personally, I am not pleased with the direction in Washington nor am I happy with what has happened to our economy in south central Kansas and I want to make a difference.

My vision for Kansas starts with our local economy and includes the protection of our privacy, the systematic reformation of our healthcare system to incorporate free market principles, strong national security, access to information for consumers, and opportunity for growth free from increasing government regulations. I also think that we can return to a balanced budget as we had for four years prior to 9-11.

For sixteen years, I worked doggedly to keep aircraft workers at their facilities in the 4th District. During the down swing in aviation, I fought for numerous initiatives that helped keep jobs here or create new jobs in the aviation industry. Whether it was alleviating government regulations or making sure the US government bought American products, I have always sought to do what is best for Kansas jobs.

Over my career in politics I have been endorsed numerous times by both local and national pro-life and pro-family groups. My consistently 100% pro-life voting record serves as one of my most important accomplishments. I believe that protecting families and life is one of the most important things we can do in America – that will never change but right now we need to make sure families can make ends meet.

We cannot do that if good paying aviation jobs have been leaving the 4th district. Boeing and Beechcraft are no longer in business in Wichita. Many will remember the fight I led to overturn the largest defense contract in history when the US government sought to outsource the purchase of air refueling tankers from a French aerospace company. I was saddened when more recently the government outsourced other aviation contracts to Brazil.

I believe that more should have been done to keep those jobs here in the US. I believe that in order to serve the 4th District of Kansas, our representative needs to be here listening to the people. Our current congressman and I disagree on some important issues. I am concerned with his support of NSA surveillance of American citizens, support for numerous bills funding Obamacare, support for military action in Syria and efforts to restrict the labeling of food products containing genetically modified organisms (GMO's). His support of these ideas gives me great concern that Kansans are not being heard in Congress.

I have a proven track record of listening and taking action to serve the people of this district and I am again seeking the opportunity to serve you again.

I am asking for your vote this August and I want you to get involved in my campaign – you can sign up for campaign updates, volunteer or donate right here.

Thank you and God bless,
Todd Tiahrt

Exhibit 6



Zoe Newton

Experienced attorney serving individuals and businesses in South Central and South East Kansas

Wichita, Kansas Area Oil & Energy

Join LinkedIn and access Zoe Newton's full profile. It's free!

As a LinkedIn member, you'll join 300 million other professionals who are sharing connections, ideas, and opportunities.

- See who you and **Zoe Newton** know in common
- Get introduced to **Zoe Newton**
- Contact **Zoe Newton** directly

[View Zoe's full profile](#)

Zoe Newton's Overview

Current **Member at Newton's Law**

Past **Vice President -- General Counsel at Hartman Companies**
Board of Trustees at KPTS
Manager, Contracts & Compliance at The Coleman Company, Inc.
[see all](#)

Education **Cornell Law School**
State University of New York at Binghamton

Connections **289 connections**

Websites **Company Website**

FEC
FORM 1

STATEMENT OF
ORGANIZATION

RECEIVED
2014 JUN -5 PM 4: 56
FEC MAIL CENTER
Office Use Only Text

1. NAME OF
COMMITTEE (In full)

☐ (Check if name
is changed)

Example: If typing, type
over the lines.

12FE4M5

Kansans for Tlahrt

ADDRESS (number and street)

PO Box 530

☐ (Check if address
is changed)

Goddard

KS

67052

CITY

STATE

ZIP CODE

COMMITTEE'S E-MAIL ADDRESS (Please provide only one e-mail address)

☐ (Check if address
is changed)

contact@toddtlahrt.com

COMMITTEE'S WEB PAGE ADDRESS (URL)

☐ (Check if address
is changed)

www.toddtlahrt.com

2. DATE

05 / 29 / 2014

3. FEC IDENTIFICATION NUMBER

C

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

George Bruce

Signature of Treasurer

George Bruce

Date

06 / 05 / 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
Toll Free 800-424-9530
Local 202-694-1100

FEC FORM 1
(Revised 02/2009)

Exhibit 8

5. TYPE OF COMMITTEE

Candidate Committee:

- (a) ☒ This committee is a principal campaign committee. (Complete the candidate information below.)
- (b) ☐ This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)

Name of Candidate

Todd Tlaht

Candidate Party Affiliation

REP

Office Sought:

☒

House

☐

Senate

☐

President

State

KS

District

04

- (c) ☐ This committee supports/opposes only one candidate, and is NOT an authorized committee.

Name of Candidate

Party Committee:

- (d) ☐ This committee is a ☐ (National, State or subordinate) committee of the ☐ (Democratic, Republican, etc.) Party.

Political Action Committee (PAC):

- (e) ☐ This committee is a separate segregated fund. (Identify connected organization on line 6.) Its connected organization is a:
- ☐ Corporation ☐ Corporation w/o Capital Stock ☐ Labor Organization
- ☐ Membership Organization ☐ Trade Association ☐ Cooperative
- ☐ In addition, this committee is a Lobbyist/Registrant PAC.
- (f) ☐ This committee supports/opposes more than one Federal candidate, and is NOT a separate segregated fund or party committee. (i.e., nonconnected committee)
- ☐ In addition, this committee is a Lobbyist/Registrant PAC.
- ☐ In addition, this committee is a Leadership PAC. (Identify sponsor on line 6.)

Joint Fundraising Representative:

- (g) ☐ This committee collects contributions, pays fundraising expenses and disburses net proceeds for two or more political committees/organizations, at least one of which is an authorized committee of a federal candidate.
- (h) ☐ This committee collects contributions, pays fundraising expenses and disburses net proceeds for two or more political committees/organizations, none of which is an authorized committee of a federal candidate.

Committees Participating in Joint Fundraiser

1.		FEC ID number	C
2.		FEC ID number	C
3.		FEC ID number	C
4.		FEC ID number	C

14031243631

NOT FOR CIRCULATION

Write or Type Committee Name

Kansans for Tlahrt

6. Name of Any Connected Organization, Affiliated Committee, Joint Fundraising Representative, or Leadership PAC Sponsor

None

Mailing Address

CITY

STATE

ZIP CODE

Relationship: ☐ Connected Organization ☐ Affiliated Committee ☐ Joint Fundraising Representative ☐ Leadership PAC Sponsor

7. Custodian of Records: Identify by name, address (phone number -- optional) and position of the person in possession of committee books and records.

Full Name

George Bruce

Mailing Address

131 S Pershing Street

Wichita

KS

67218

Title or Position

CITY

STATE

ZIP CODE

Treasurer

Telephone number

316 - 351 - 8768

8. Treasurer: List the name and address (phone number -- optional) of the treasurer of the committee; and the name and address of any designated agent (e.g., assistant treasurer).

Full Name
of Treasurer

George Bruce

Mailing Address

131 S Pershing Street

Wichita

KS

67218

Title or Position

CITY

STATE

ZIP CODE

Treasurer

Telephone number

316 - 351 - 8768

14031243632

Full Name of
Designated
Agent

Mailing Address

CITY

STATE

ZIP CODE

Title or Position

Telephone number

9. Banks or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of Bank, Depository, etc.

Legacy Bank

Mailing Address

3711 N. Ridge Road

Wichita

KS

67205

CITY

STATE

ZIP CODE

Name of Bank, Depository, etc.

Mailing Address

CITY

STATE

ZIP CODE

14031243633

This envelope is for use with the following services:

- UPS Next Day Air®
- UPS Worldwide Express™
- UPS 2nd Day Air®

Apply shipping documents on this side.

SHP WT: LTR
DATE: 05 JUN 2014

- 1000 11PM
(316) 200-1210
THE UPS STORE #2956
8910 W 21ST ST N STE 200
WICHITA KS 67205-1080

SHIP FEDERAL ELECTION COMMISSION
TO: 999 E ST NW

- WASHINGTON DC 20463-0001

10-100

2014 JUN -6 PM 4:56
FEC MAIL CENTER

UPS NEXT DAY AIR SAVER 1P

TRACKING #: 17 925 W89 13 5227 2040

BRI | INC: P/P


APR 19 AM 7:03 PM '14

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010195101 1/10 PAC United Parcel Service, Louisville, KY

Federal Election Commission
ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS
 The FEC added this page to the end of this filing to indicate how it was received.

<input type="checkbox"/> Hand Delivered	Date of Receipt
<input type="checkbox"/> USPS First Class Mail	Postmarked
<input type="checkbox"/> USPS Registered/Certified	Postmarked (R/C)
<input type="checkbox"/> USPS Priority Mail	Postmarked
<input type="checkbox"/> USPS Priority Mail Express	Postmarked
<input type="checkbox"/> Postmark Illegible	
<input type="checkbox"/> No Postmark	
<input checked="" type="checkbox"/> Overnight Delivery Service (Specify): <u>UPS</u>	Shipping Date <u>6/5/14</u>
Next Business Day Delivery <input checked="" type="checkbox"/>	
<input type="checkbox"/> Received from House Records & Registration Office	Date of Receipt
<input type="checkbox"/> Received from Senate Public Records Office	Date of Receipt
<input type="checkbox"/> Received from Electronic Filing Office	Date of Receipt
<input type="checkbox"/> Other (Specify):	Date of Receipt or Postmarked
 PREPARER (8/2013)	<u>6/9/14</u> DATE PREPARED

14031243635

14031243635

Presented by the Federal Election Commission

Individual Contributions Arranged By Type, Giver, Then Recipient

Contributions to Political Committees

HARTMAN, WILLIS (WINK)
ROSE HILL, KS 67133
HARTMAN OIL CO.

TIAHRT, TODD

VIA KANSANS FOR TIAHRT

04/06/2010

1900.00

10020472331

HARTMAN, WILLIS (WINK)
WICHITA, KS 67230
HARTMAN OIL CO

TIAHRT, TODD

VIA KANSANS FOR TIAHRT

02/09/2010

500.00

10020252940

HARTMAN, WILLIS (WINK)

PAGE 1 OF 2
FOR SE OF FORM 24/48

Exhibit 10

Image# 14961234211

PAGE 2 / 2

FEC MISCELLANEOUS TEXT RELATED TO A REPORT, SCHEDULE OR ITEMIZATION

Form/Schedule: F24N

Transaction ID :

runs 6/2-6/13

Form/Schedule:
Transaction ID:

14961234211

From: Wink Hartman [mailto:whartman@hartmanoil.com]
Sent: Monday, June 02, 2014 8:45 AM
To:



Subject: Todd Tiahrt

Please join the Todd Tiahrt at Chester's and hear his vision going forward. Let's return leadership to the log jam in Washington. It is time we have a real conservative that understands the Constitution and People Rights.

Wink

Hartman

Fourth Congressional District
Candidate

Todd Tiahrt

At

Chester's Chophouse & Wine Bar

5 to 7 P.M.

Monday June 9th

1550 N. Webb Rd
201.1300

Fundraiser
SSS

Are You a Vice President? - Apply Now to the National Association of Professional Women. Register Free



Michael O'Donnell

State Senator at State of Kansas
Wichita, Kansas Government Administration

Current State of Kansas, Hartman Oil Company, Inc.
Previous City of Wichita Kansas, Clear Channel Wichita, KS
Education Friends University

Connect

Send Michael InMail

247
connections

www.linkedin.com/pub/michael-o-donnell/87/b38/611

Background

Experience

State Senator
State of Kansas
January 2013 – Present (1 year 6 months)

Communications Director
Hartman Oil Company, Inc.
November 2011 – Present (2 years 8 months)

Council Member
City of Wichita Kansas
April 2011 – December 2012 (1 year 9 months)

Account Executive
Clear Channel Wichita, KS
May 2005 – November 2011 (6 years 7 months)

Skills & Endorsements

- 10 Political Campaigns
- 6 Politics
- 6 Public Policy
- 5 Policy Analysis
- 4 Legislative Relations
- 2 Marketing
- 1 Communications Planning

Education

Friends University
Bachelor of Arts (B.A.), Political Science and Government

2nd

People Similar to Michael



Ty Masterson 2nd
Kansas State Senator - District 16 at State o...
Connect

Google
Apps for Business

Email Docs Storage Meetings

Start Free Trial

People Also Viewed



Big Al Ceynar
Auto sales and leasing consultant at
DAVIS-MOORE
CHEVROLET, DODGE, JEEP, CHRYSLER, FIAT, NISSAN, MAZDA, LINCOLN, TOYOTA



Mary Beth Dutko
Director of Recruiting at Hawthorne
Executive Search



gabriel garcia
International Affairs Professional



Jean Sims
Registered Nurse at Olathe Health
System, Inc.



Livvy Nallipogu
Team leader for Rescuing lives



Jan Jarman
Assistant City Attorney at City of
Wichita Kansas

Audrey Lappan
Environmental Health at Sedgwick
County Health Department

Erin Pettera
Marketing Assistant at The Westerly at
Presbyterian Manors of Mid-America

Vanessa Lohf
Public Health Initiative Project
Specialist at Wichita State University

Exhibit 12

LinkedIn



Jim Anderson

Owner PostNet at 21st & Greenwich Road | Freedom is never more than one generation away from extinction ~ Ronald Reagan

Wichita, Kansas Area • Funding

Join LinkedIn and access Jim Anderson's full profile. It's free!

As a LinkedIn member, you'll join 300 million other professionals who are sharing connections, ideas, and opportunities

- See who you and Jim Anderson know in common
- Get introduced to Jim Anderson
- Contact Jim Anderson directly

View Jim's full profile

President at Owner of PostNet at Greenwich Road and 21st, Wichita Kansas

Jim Anderson Republican Candidate for the People of the 4th US Congressional District of Kansas at Jim Anderson, Republican Candidate for the People of the 4th US Congressional District of Kansas

2011-2012

President

Owner of PostNet at Greenwich Road and 21st, Wichita Kansas

October 2011 - Present (5 years 2 months) PostNet Greenwich Rd & 21st 11310 East 21st St W
Wichita KS 67206

Graphic Design, Printing (Digital & Offset), Websites, Shipping, Business Plans, Bulk Mailing.



Michael O'Donnell

Kansas State Senator, Marketing
Director for Hartman Companies;
Son-Of-A-Preacher-Man

michaelforkansas.com

Joined February 2012

• **Michael O'Donnell**

o Director of Marketing for Hartman Oil



Michael O'Donnell

Kansas State Senator, Marketing Director for Hartman Oil Corporation, The Oil & Gas Industry Man

Joined February 2012

102

149

694

56

1494

Tweets

Tweets and replies



Congressman Phonetap

Take me! Take me! I love these jackets! (I'll be in a Mayor Car! Brewer will lead a delegation to Shenyang in August on a trade visit)



Congressman Phonetap

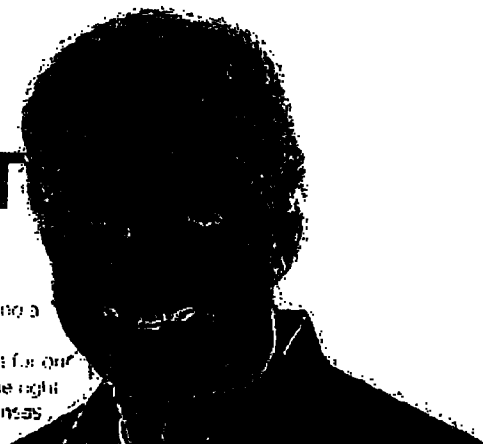
Bring it on, I ain't waitin' for your cars (promise.)

o State Senator



CHARACT COUNTS

Todd Tiahrt is a proven conservative and a proven leader. He will work for the constituents of the 4th district and fight for our Kansas conservative values. Todd is the right choice and now is the right time for Kansas.



Transcript of Kansans for Responsible Government Radio Commercial:

"You know, it would be really nice to have a true conservative leader in Washington that will fight Obama every single day.

Didn't you hear? Todd Tiahrt is running for Congress. Todd knows we must stop Obama care and he won't compromise until its repealed

Tanker Todd Tiahrt is running for congress? I remember when he stood up for Kansas defense jobs. Our area lost so many jobs, but Todd fought to protect our jobs from being outsourced to Brazil.

And Todd Tiahrt is a constitutional conservative. He won't allow the Federal government to spy on its citizens

Don't forget Todd's A+ rating from the NRA. Todd has, and always will, stand up for our constitutional rights.

Todd Tiahrt, he's the pro life conservative we can trust to battle Obama's liberal agenda day in and day out. The true conservative who will always stand up for Kansans.

Kansans for Responsible Government is responsible for the content of this advertising. Paid for by Kansans for Responsible Government and not authorized by any candidate or candidate's committee."

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES
 (Schedule E)

 PAGE 1 OF 2
 FOR SE OF FORM 24/48

NAME OF COMMITTEE (In Full)

KANSANS FOR RESPONSIBLE GOVERNMENT

FEC IDENTIFICATION NUMBER

C C00563296

 Check if 24-hour report ☒ 48-hour report ☒ New report ☐ Amends report filed on

Full Name of Payee

Strategic Media Services

Date of Public Distribution/Dissemination

06 19 2014

 Mailing Address 1911 North Ft Myer Dr
 Ste 400

Amount

47867.00

 City State Zip Code
 Arlington VA 22209

Transaction ID : SE.4115

Date of Disbursement or Obligation

06 18 2014

 Purpose of Expenditure
 Advertising Production and Placement

 Category/
 Type

Name of Federal Candidate

MICHAEL R POMPEO

Support

☒ Oppose

Office Sought:

☒ House District: 04☐ President☐ Senate State: KS
 Calendar Year-To-Date
 Per Election for Office Sought

63367.00

Disbursement For: ☒ Primary ☐ General2014 ☐ Other (specify) -

Full Name of Payee

Date of Public Distribution/Dissemination

Mailing Address

Amount

City State Zip Code

Purpose of Expenditure

 Category/
 Type

Date of Disbursement or Obligation

Name of Federal Candidate

Support

Oppose

Office Sought:

☐ House District: _____☐ President☐ Senate State: _____
 Calendar Year-To-Date
 Per Election for Office Sought
Disbursement For: ☐ Primary ☐ General☐ Other (specify) -

(a) SUBTOTAL of Itemized Independent Expenditures 47867.00

(b) SUBTOTAL of Unitemized Independent Expenditures

(c) TOTAL Independent Expenditures

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.

Willis Hartman

[Electronically Filed]

Date

06 21 2014

Signature

Exhibit 18

Image# 14941627632

PAGE 2 / 2

FEC MISCELLANEOUS TEXT RELATED TO A REPORT, SCHEDULE OR ITEMIZATION

Form/Schedule: F24N

Transaction ID :

runs 6/19-6/26

Form/Schedule:

Transaction ID:

6/26/14

Print

Subject: Tiahrt HQ is Busy - We Need You!!

From: Todd Tiahrt (contact@toddtiahrt.com)

To: [REDACTED]

Date: Tuesday, June 24, 2014 7:24 PM

Tiahrt Headquarters is Busy - We Need You!!

[View this email in your browser](#)



Tiahrt Campaign Headquarters is Busy and We Have Volunteer Opportunities

Come Help Out at Campaign Headquarters

**We need you to help and there are a number of
ways you can be involved.**

1. **Yard Signs** - you can stop in any time to pick up yard signs - we are located at 8000 W. Central in Wichita. If you are closer to the east side of Wichita, you can pick up yard signs at Postnet located at 11310 East 21st Street North (that is on the northeast corner of 21st & Greenwich).
2. We need volunteers to help us deliver literature to voters in your area. We can provide precinct walking lists and all the literature you need. This is big job and we need your help!
3. As always there is work to do at the Campaign Headquarters - whether it is assembling signs, bundling literature, making phone calls or answering the phone -- if you can help an hour or two a week or several hours a day.

about:blank

Exhibit 19

help is essential to our campaign.

Please stop in to see us at **8000 West Central** (right across the street from Bishop Carroll High School).

Come grab a sign for your yard and let us know what you can do to help over the next 41 days heading into the August 5th Primary.



Share



Tweet

Visit Our Website

Paid for by Kansans for Tiahrt - George Bruce - Treasurer
PO Box 520, Goddard, KS 67052
(316) 351-8768

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Thank you for your interest in the Tiahrt campaign. You are receiving this email because you have indicated that you are interested in receiving updates from us.

Our mailing address is:

Kansans for Tiahrt
PO Box 530
Goddard, KS 67052

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