

October 23, 2020

Iowa Ethics and Campaign Disclosure Board

Mike Marshall, Executive Director

Via Email

Dear Ethics Board Members and Director Marshall:

Something strange is happening. Iowa Democratic statehouse candidates are receiving hundreds of questionable campaign contributions. Donations from people living outside the United States, misrepresenting their address, and tens of thousands of donations given in low dollar increments, and being reported by campaigns as "unitemized," so they do not show up on finance reports that Iowans may view. This gives the appearance of a purposeful effort to skirt our campaign finance laws while Democrat candidates turn a blind eye.

This is truly an unprecedented situation where dozens and dozens of foreigners, somehow and for some reason, are giving to several candidates for Iowa House.

We believe this raises serious questions about the legality of these donations, since Iowa and federal law preclude candidates from accepting donations from foreign nationals. How can Iowans be reassured that these contributions are legal and legitimate? We believe that these Democrat candidates are turning a blind eye to possible violations of Iowa laws.

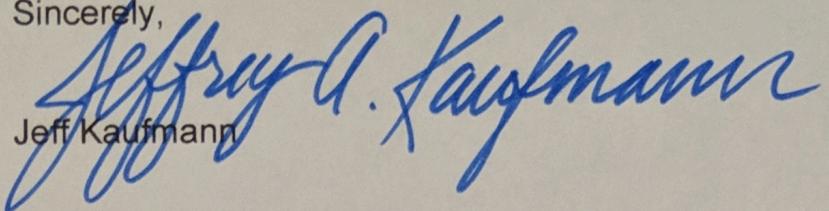
The attached chart reflects a number of contributions received and reported by Democratic candidates for the Iowa House of Representatives. The contributions were all reported on the October 19, 2020 reports filed by these candidates. These contributions raise the following potential violations of Iowa's campaign finance laws:

1. The addresses and cities are not in the United States. Foreign nationals are prohibited from making contributions to state candidates under IECDB administrative rule 351-4.28. This same prohibition is also found in federal law (52 USC 30121 and FEC regulation 11 CFR 110.20). Both federal law and Ethics Board rules prohibit foreign nationals from making contributions in connection with state campaigns. This reflects how important this issue is to the security of Iowa's elections. If these are indeed prohibited contributions, they need to be refunded immediately.
2. Several of these contributions are listed as coming from "IA" as the state. This is factually impossible. For example, there is no "Tel Aviv, Iowa." The "name and mailing address" of contributors is required by Iowa Code section 68A.402A(1). The hallmark of campaign finance is the true and accurate disclosure of campaign transactions so that

Iowa's voters can make fully informed decisions. These disclosures do not comply with the law or uphold the very foundation of Iowa's election laws.

The Iowa Ethics and Campaign Disclosure Board needs to take immediate action to ensure these issues are resolved prior to the election. Iowans are currently casting their ballots and time is of the essence. Iowa's election laws limit the sources of campaign funding and also require accurate disclosure of contributions. The citizens of Iowa deserve nothing less from candidates for public office.

Sincerely,



A handwritten signature in blue ink that reads "Jeffrey A. Kaufmann". The signature is fluid and cursive, with "Jeffrey A." on top and "Kaufmann" on the bottom. The "J" in "Jeffrey" has a long vertical stroke.

Jeff Kaufmann