



PROGRESSIVE MARYLAND

P.O. Box 6988 Largo, MD 20792
www.ProgressiveMaryland.org
Contact@ProgressiveMaryland.org
Facebook.com/ProgressiveMaryland
@Progressive MD

Malcolm J. Heflin, Baltimore City Organizer
malcolm@progressivemaryland.org
+1-443-956-0001

May 4, 2020

Jared DeMarinis, Director
Candidacy and Campaign Finance Division
Maryland State Board of Elections
151 West Street, Suite 200
Annapolis, Maryland 21401

Re: Citizens for Ethical Progressive Leadership PAC
Bradley K. Myers, Chairperson
Martin G. Knott, Treasurer

Dear Mr. DeMarinis:

Please accept this letter as a formal complaint and request for investigation of the above referenced PAC and officers thereto. As you know, the provisions of Title 13 of the Election Law Article, Annotated Code of Maryland with regard to registration/filing and expenditures is very clear for an Independent Expenditure (Super Political Action Committee). It is our belief that Citizens for Ethical Progressive Leadership PAC, Bradley K. Myers, Chairperson and/or Martin G. Knott, Treasurer are in violation of Election Law, § 13-306 and the Maryland State Board of Elections regulations. Detailed below is the factual basis for our complaint and request.

Recently, an email was widely circulated by Ann Beegle, Campaign Manager for Mary Miller, a candidate for Mayor of Baltimore City. That email touted a Memorandum which detailed a poll that was conducted by Garin Hart Yang Research Group concerning the upcoming Baltimore City primary mayoral election. A copy of the Memorandum is attached to this correspondence. This same poll was also highlighted in social-media communications by at least one of the consultants for Mary Miller. Of particular note is that the Memorandum specifically states that **'[t]his message has been authorized and paid for by Citizens for Ethical Progressive Leadership PAC, Martin G. Knott, Treasurer.'** Within the details of the Memorandum it indicates that the poll was conducted between **April 13 and April 16, 2020**. A review of the Board of Elections database indicates that the aforesaid Citizens for Ethical Progressive Leadership PAC did not file its Statement of Organization until **April 30, 2020**, at least fourteen days after the poll was completed.

The failure of the Super PAC, its Chairperson and Treasurer to register with the Board of Elections until two weeks after it had apparently expended funds is a clear violation of the



PROGRESSIVE MARYLAND

P.O. Box 6988 Largo, MD 20792
www.ProgressiveMaryland.org
Contact@ProgressiveMaryland.org
Facebook.com/ProgressiveMaryland
@Progressive_MD

Maryland election law finance filing requirements and regulations. The specific provisions violated include, but are not limited to, Election Law § 13-306, COMAR 33.13.08.01, COMAR 33.13.08.02 and COMAR 33.13.08.03. Additionally, their failure to file a contribution and expenditure report on April 28, 2020 is another violation.

The Chairperson and Treasurer should be well aware of the aforesaid statute and regulations. In the Super PAC's own Statement of Organization, Myers and Knott agreed to fully follow and comply with all Election Law requirements and regulations. Their failure to register and timely file an expenditure report with the Board of Elections is a gross disregard for the very laws and regulations they promised to obey. We believe this warrants an investigation into the activities and expenditures of this organization, its officers and members.

If anything further is needed to effectuate this complaint and request for investigation, please do not hesitate to contact me.

Very truly yours,

Malcolm J. Heflin

Enclosure CEPL PAC Memorandum