February 7, 2020

Office of the General Counsel Federal Election Commission 1050 First Street, NE Washington, DC 20463

To Whom It May Concern:

By this letter, we, Michael Saltsman and Austin Samuelson of the Employment Policies Institute (1090 Vermont Ave, NW Suite 800, Washington, D.C. 20005), file a complaint with the Federal Election Commission pursuant to 2 USC §30118(a), 11 CFR §§ 100.52, 100.54, 114.2(b) and (f), 114.9(a)(3) and (b)(3) against Eva Putzova for Congress and the Restaurant Opportunities Center (ROC), a Section 501(c)(3) corporation for violations of federal election law.

Based on information and belief, ROC, a § 501(c)(3) non-profit corporation, has provided illegal in-kind contributions, pursuant to 52 U.S.C. §30118(a), to Eva Putzova for Congress by compensating its employee, Steven Piasecki, as he regularly engaged in candidate-related work during the course of the normal workday. The Act and Commission regulations prohibit a corporation from providing any type of contributions to candidates.

Respondents include an individual candidate for federal office, a federal candidate campaign committee and its treasurer, the candidate's campaign communications director, and a § 501(c)(3) corporation.

Respondents

Eva Putzova, 1700 E Linda Vista Dr Flagstaff, AZ 86004

Eva Putzova for Congress P.O. Box 677 Flagstaff, AZ 86002

Steven Piasecki 65 Park Terrace W Apt.4a New York, NY 10034

Restaurant Opportunities Center 275 7th Ave New York, NY 10001

Facts

Except where noted, the facts supporting this complaint are taken from materials publicly available, including Federal Election Commission records. All material facts relied upon in this complaint are cited as to their source.

On January 1, 2019, Ms. Putzova filed her candidacy for the Democratic nomination to be the US Representative for Arizona's 1st Congressional District. Ms. Putzova was the Director of Communications for ROC at the time of her filing; according to her LinkedIn page, she was still employed in that capacity as of this date (February 7,

2020). Attached to this complaint as **Exhibit A** are the statement of organization documents filed with the FEC by Eva Putzova, declaring herself a candidate for the US House of Representatives.

Ms. Putzova's campaign Communications Director, Mr. Steven Piasecki, is also employed by ROC as its Communications Coordinator. He has served in this role since September of 2018, and is primarily responsible for maintaining the group's social media presence.

- Attached as Exhibit B are social media postings and a screenshot of ROC's official website
 demonstrating Ms. Putzova's employment at ROC and Mr. Piasecki's dual employment with Eva Putzova
 for Congress and ROC.
- Exhibit C includes a downloadable document from the official ROC United website. The document serves as a social media toolkit and the ROC official listed as the contact is Mr. Steven Piasecki.

According to FEC filings, Mr. Piasecki's pay for his services to the Putzova campaign is \$600 a month (See **Exhibit B**). However, digital evidence shows a blurry line between Mr. Piasecki's work with ROC and his work with the Congressional campaign as Communications Director—such that ROC is essentially subsidizing his campaign work and that he may be using corporate resources in his work for the campaign.

Mr. Piasecki's overlapping job activity between the nonprofit corporation and Ms. Putzova's campaign is evident in **Exhibit D**, which includes all tweets sent from the Twitter accounts of EvaForCongress, Mr. Piasecki, Eva Putzova, and ROC United during the months of February-October 2019. (During these dates, FEC filings show that Mr. Piasecki was being paid by Ms. Putzova's campaign to act as the Communications Director.)

Mr. Piasecki's digital work for the Putzova campaign overlaps regularly with his digital work for the nonprofit corporation. The time of the day each account is active even shifts with Mr. Piasecki's location; his move from California to New York in June 2019 corresponded with a shift in Twitter activity to reflect "sleeping hours" for a person based on the east coast.²

Mr Piasecki's control of the digital accounts of both ROC and Ms. Putzova's campaign is evident in the device type used to post content, as well as Mr. Piasecki's use of similar content across both accounts.

- According to data from ExportTweet, Ms. Putzova uses an iPhone; before she launched her campaign for Congress, not a single tweet from her account came from an Android device (See Exhibit E). After she declared her candidacy and hired Mr. Piasecki as her Communications Director, over half of the tweets from her personal account (which doubles as her campaign account) were sent from an Android devicecompared to just 7 percent being sent from an iPhone.
- Similarly, prior to ROC United hiring Mr. Piasecki as its Communications Coordinator, just 2 percent
 of the group's tweets from 2016-2018 were sent from an Android device. However, after he started his
 role in late 2018, the number of tweets sent from an Android device on the official ROC United Twitter
 account increased to over 20 percent.

The data from **Exhibit E** is visualized in **Exhibit D**, where workday tweets are sent moments apart from Mr. Piasecki's personal account, the ROC United Twitter account, and the Eva Putzova for Congress official Twitter account.

Data was obtained and downloaded using ExportTweet

A screenshot of Steven Piasecki's personal Facebook account has been included in Exhibit D. This screenshot is of a post made by Mr. Piasecki announcing his move to New York in July of 2019. The date of his move to the east coast reflects the time shift of tweets sent from his personal twitter account, Eva Putzova's twitter account, and the ROC United twitter account, further demonstrating that Mr. Piasecki was in fact the operator of these accounts.

Apparent Violations

Complainants have found reason to believe Respondents violated 2 USC §30118(a), 11 CFR §§ 100.52, 100.54, 114.2(b) and (f), 114.9(a)(3) and (b)(3). Eva Putzova for Congress, Eva Putzova, and the Restaurant Opportunities Center United have violated federal law which prohibits donations and contributions by a corporation or labor organization to a candidate for federal office and the acceptance of said contribution by a candidate for federal office.

Relief Requested

Complainants are asking the Federal Election Commission to conduct an investigation, including an audit of named respondent campaign committee, in accordance with the Federal Election Campaign Act of 1971, as amended. The Commission should also refer to the Internal Revenue Service (IRS) to determine whether the Restaurant Opportunities Center is eligible to keep its § 501(c)(3) non-profit status.

Complainant, upon information and belief, swear under penalty of perjury that the statements and facts of this complaint are true and correct to the best of his knowledge and belief.

Michael Saltsman, Managing Director

Employment Policies Institute

Austin Samuelson, Research & Communications Associate

Employment Policies Institute

DISTRICT OF COLUMBIA: ss

SUBSCRIBED AND SWORN TO BEFORE ME

THIS 10th DAY OF February, 2020.

NOTARY PUBLIC

My Commission Expires Sep 14, 2023



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			Office Use Only		
 NAME OF COMMITTEE (in full) 	(Check if name is changed)	Example: If typing, type over the lines.	12FE4M5		
Eva Putzova for	Congress				
ADDRESS (number and street)	PO Box 677				
(Check if address	Leverer				
is changed)	Flagstaff		AZ 86002		
	CITY		STATE ▲ ZIP CODE ▲		
COMMITTEE'S E-MAIL ADDR	ECC				
(Check if address	info@evaforcongress.c	om			
is changed)					
	Optional Second E-Mail Add	dress			
is changed)					
2 DATE 01	16 2019				
3. FEC IDENTIFICATION N	NUMBER ▶ C co	00694091			
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.		
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Signature of Treasurer Zeah	man, Lorena,	[Electronically Filed]	ate 01 16 2019		
NOTE. Submission of false, error		may subject the person signing this ON SHOULD BE REPORTED WITH	Statement to the penalties of 2 U.S.C. §437g. HIN 10 DAYS.		
Office Use Only		For further information cont Federal Election Commission Toll Free 800-424-9530 Local 202-694-1100	FEC FORM 1 (Revised 06/2012)		

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	FEC Fo	rm 1 (Revised 02/2009)	Page 2	
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Agent	Little Li		لتتتتتت
Mailing Address	1700 E Linda Vista Dr		
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	Flagstaff	AZ	86004
	CITY	STATE	ZIP CODE
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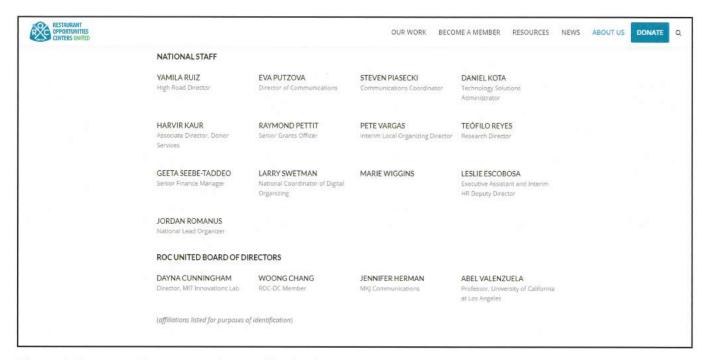


Figure 1: Restaurant Opportunities Center Official Website – Eva Putzova (Director of Communications & Steven Piasecki (Communications Coordinator)

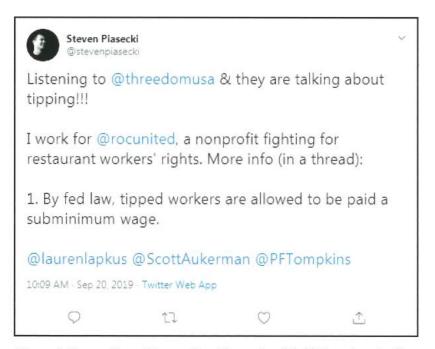


Figure 2: Steven Piasecki tweet dated September 20, 2019 stating that he is employed by the Restaurant Opportunities Center

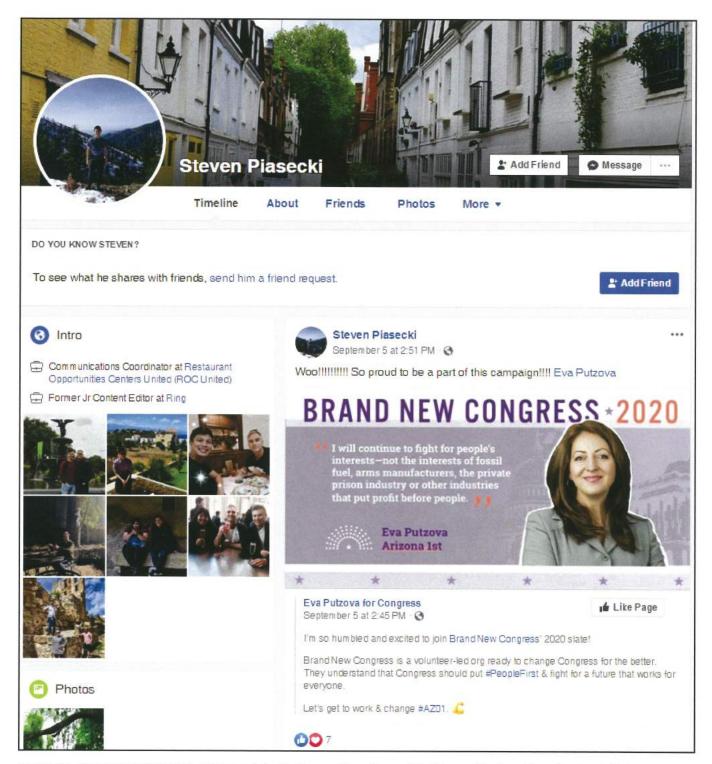


Figure 3: Steven Piasecki Facebook page. Introduction section of page lists Communications Coordinator at Restaurant Opportunities Center United (ROC United) as employer. A September 5, 2019 post by Mr. Piasecki shared an official Eva Putzova for Congress facebook page post with a caption that read "Woo!!!!!!!!! So proud to be a part of this campaign!!!! Eva Putzova"

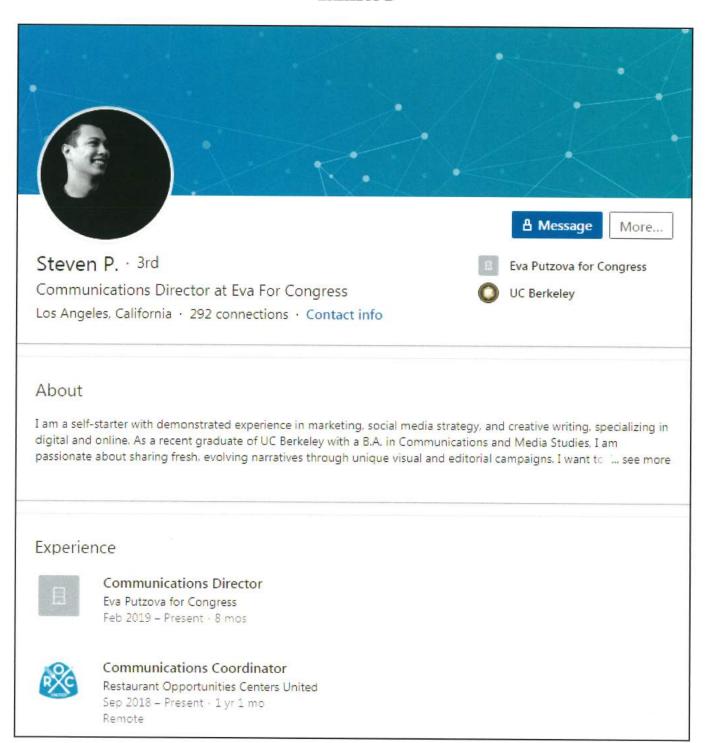


Figure 4: Mr. Piasecki's linkedIn page which lists "Communications Director for Eva Putzova for Congress" and "Communications Coordinator at Restaurant Opportunities Center United" as his current employers.

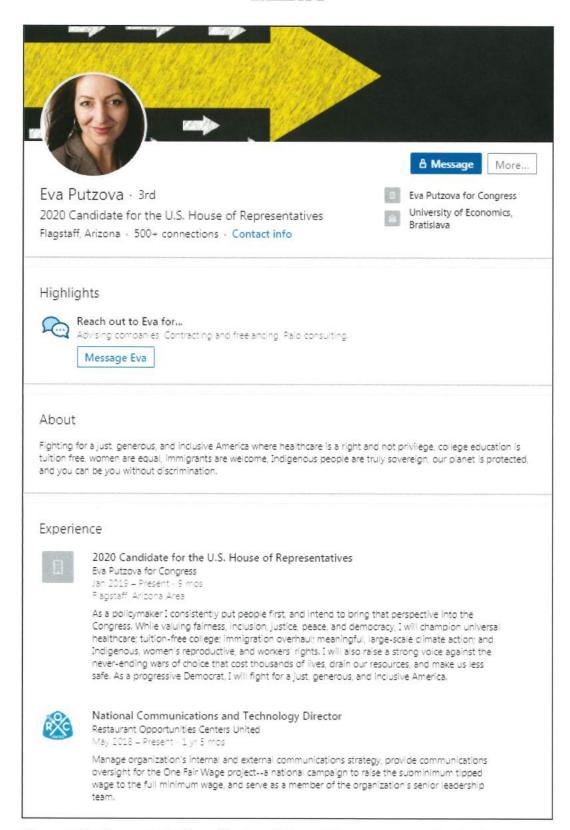


Figure 5: Eva Putzova LinkedIn profile—lists "National Communication and Technology Director at Restaurant Opportunities Center United" as current position, beginning May 2018. Also lists "2020 Candidate for the U.S. House of Representatives Eva Putzova for Congress" beginning January 2019.

EVA PUTZOVA FOR CONGRESS	PIASECKI, STEVEN	CA	SOCIAL MEDIA AND COMMUNICATIONS CONSULTING	06/14/2019	\$600.00
EVA PUTZOVA FOR CONGRESS	PIASECKI, STEVEN	CA	SOCIAL MEDIA AND COMMUNICATIONS CONSULTING	05/18/2019	\$600.00
EVA PUTZOVA FOR CONGRESS	PIASECKI, STEVEN	CA	SOCIAL MEDIA AND COMMUNICATIONS CONSULTING	04/16/2019	\$600.00
EVA PUTZOVA FOR CONGRESS	PIASECKI, STEVEN	CA	COMMUNICATIONS CONSULTING SERVICES	03/15/2019	\$600.00
EVA PUTZOVA FOR CONGRESS	PIASECKI, STEVEN	CA	COMMUNICATIONS CONSULTING SERVICES	02/15/2019	\$600.00

Figure 6: Eva Putzova for Congress official FEC spending report showing \$600 disbursements to Steven Piasecki for communications and social media services during the months of February, March, April, May, and June of 2020.



Basic Social Media Toolkit

Follow Us

Facebook

Twitter

Instagram

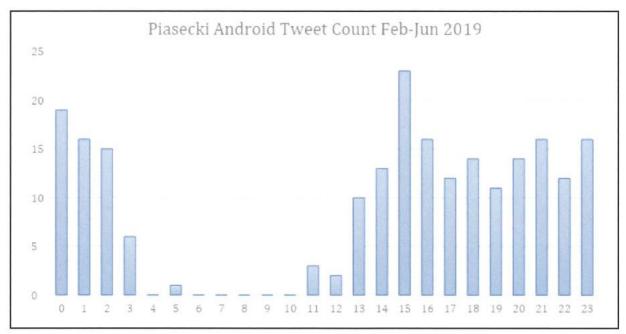
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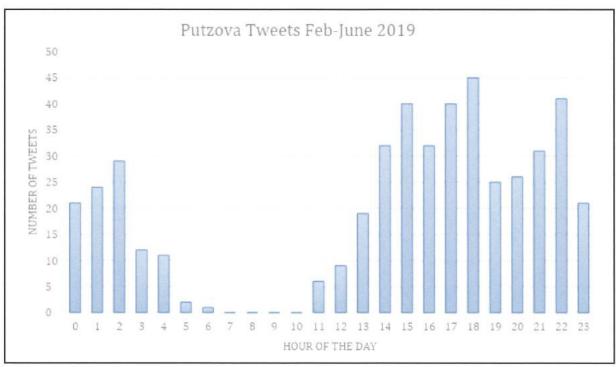
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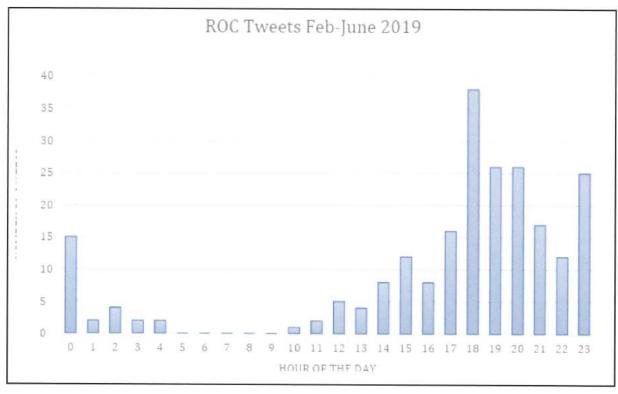
Website

Contact

Steven <u>Piasecki</u> steven@rocunited.org







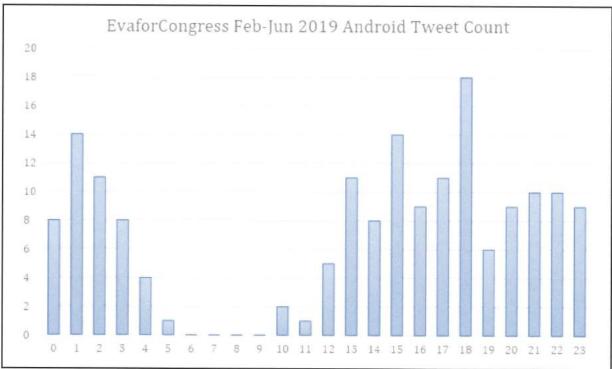


Figure 7: These graphs demonstrate clear coordination and trends during the months of February, March, April, May, and June of 2016—the months Mr. Piasecki was being paid by the Eva Putzova for Congress campaign and ROC United.

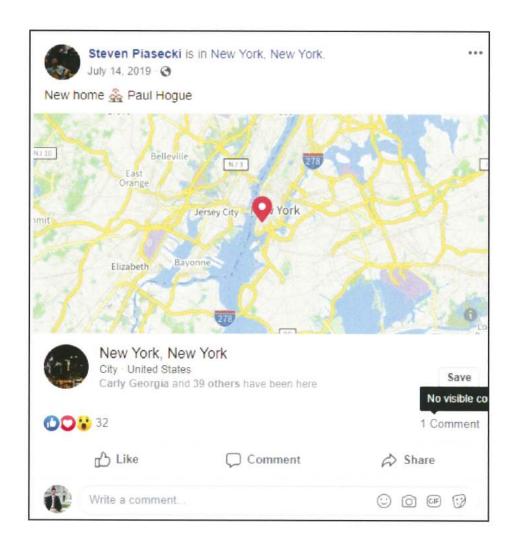
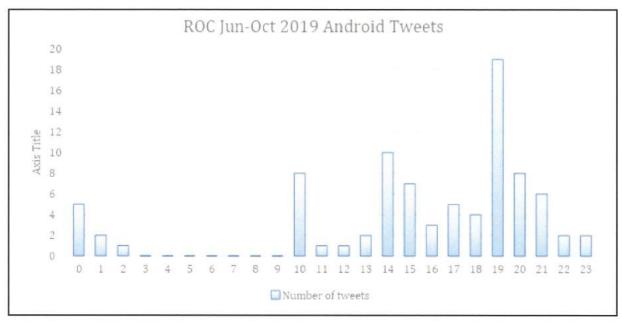
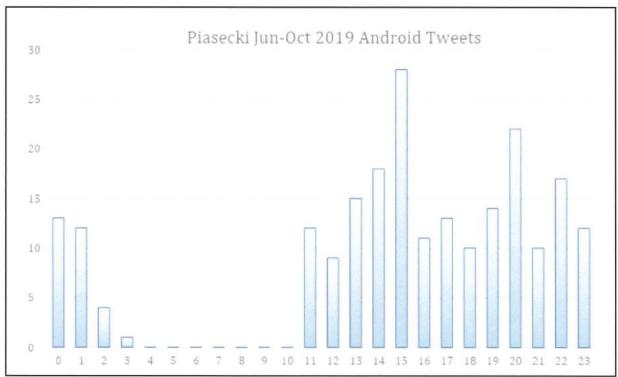
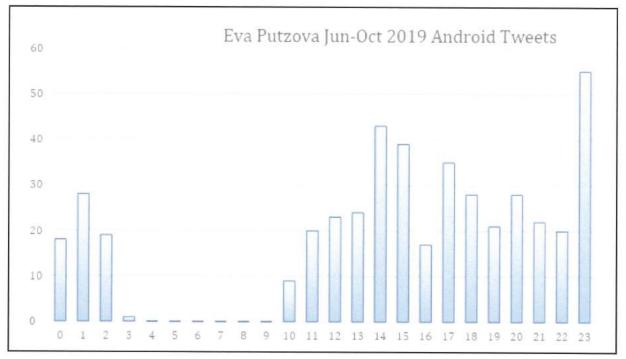


EXHIBIT D







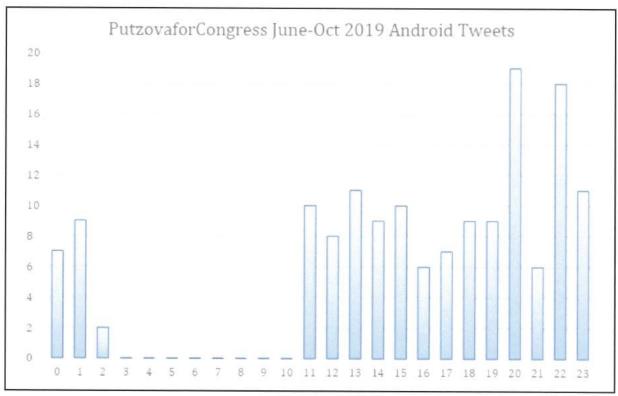
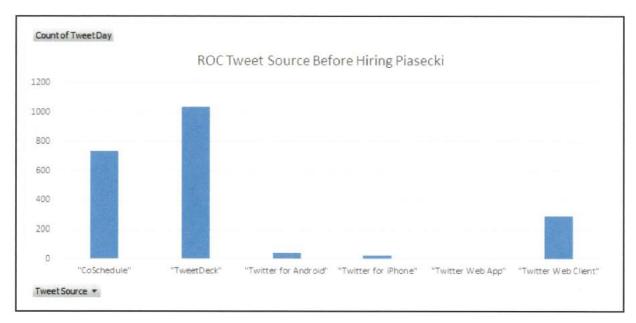


EXHIBIT E



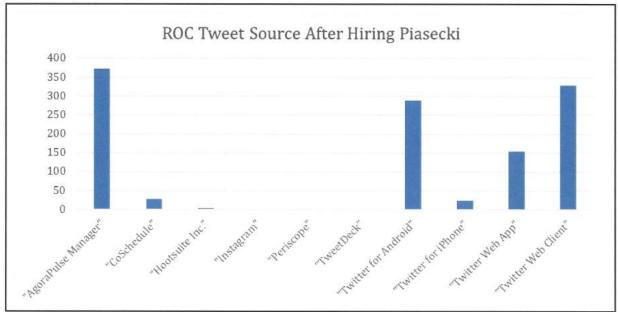
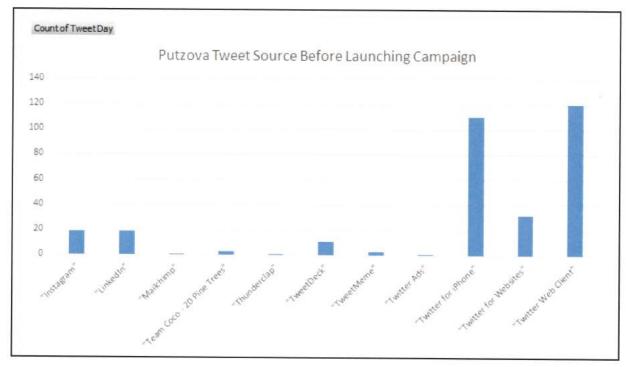
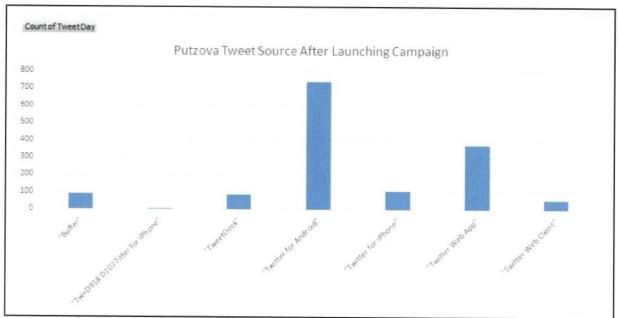
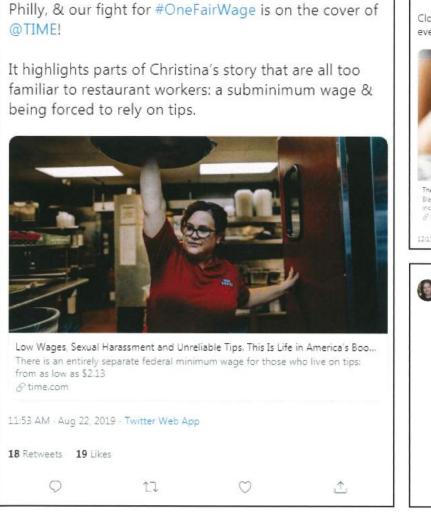


EXHIBIT E







1) The story of Christina Munce, a tipped worker in

ROC United ②

@rocunited





Figure 8: On August 22, 2019, it again appears as if the official ROC United twitter account and their Communications Director and candidate for Federal Office, Eva Putzova coordinated tweets that were sent from the same platform just 20 minutes apart.

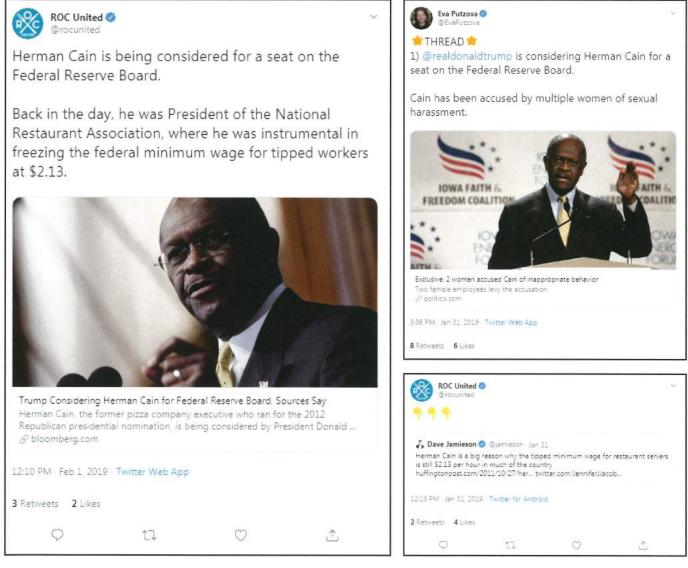


Figure 9: On January 31 and February 1, 2019, it appears as if there is direct coordination between the ROC United and their Communications Director, Congressional Candidate Eva Putzova to oppose the nomination of a political appointee.

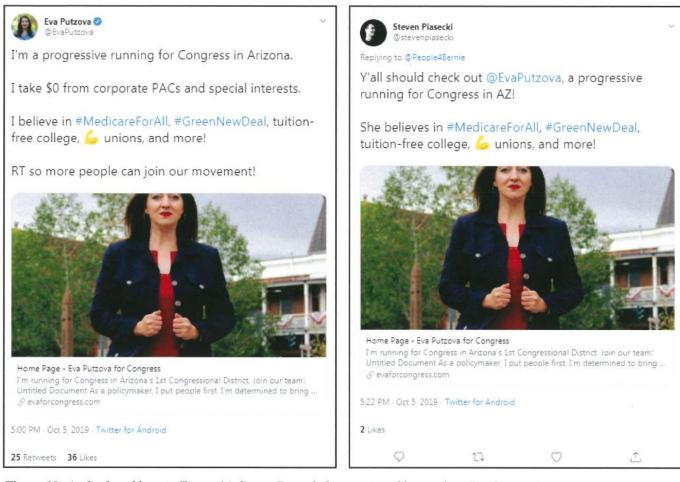


Figure 10: As displayed here in Figure 14, Steven Piasecki has continued his work as Eva Putzova's campaign manager into October. Mr. Piasecki is still employed by ROC, according to his LinkedIn.



