

Ann M. Ravel  
RAVELLAW  
25 Central Avenue  
Los Gatos, CA 95030  
March 21, 2024

To: Lisa Stevenson, acting chairperson, Federal Election Commission

Dear Ms. Stevenson:

Attached please find a complaint alleging the violation of campaign finance laws by U.S. Rep. Kevin Kiley, related to his role with Californians to Reduce Homelessness, Drug Addiction and Theft (CRHDAT), which is sponsoring a proposed ballot initiative in California aimed at rolling back criminal justice reform in the State.

The complaint makes clear there is compelling evidence that CHRDAT, in its efforts to raise money to fund the collection of the requisite voter signatures required to qualify the proposed initiative for this November's statewide ballot, has received and spent money in violation of federal limits.

The primary allegations in the complaint include:

- While a member of the California Assembly, now-Congressman Kevin Kiley was among the most vocal critics of criminal justice reform and among the most high profile supporters of efforts to roll back voter approved justice system policy.
- In 2022, in support of his campaign to win election to the United States Congress, Rep. Kiley opened a campaign committee called "Kevin Kiley for Congress," which raised money to support his campaign.
- In 2023, at the same time as the Kevin Kiley for Congress Committee was paying the law firm Bell, McAndrews and Hiltachk, LLP (BMH) for legal services, BMH drafted and submitted language for the initiative and subsequently created the ballot measure campaign committee. Immediately thereafter, the first major donors to the ballot committee happened to also be major donors to the Kevin Kiley for Congress committee.
- To date, Kevin Kiley for Congress has reported providing a total of \$28,511.84 in non-monetary donations to CRHDAT to support the signature gathering effort. Kiley has also provided CRHDAT with critical "seed money" and taken a lead role in the organization by providing it with core administrative services at a time when CRHDAT is getting off the ground.
- CRHDAT subsequently solicited and received sizable donations from major retail corporations, including WalMart, Target, Macy's and Home Depot. Those amounts are detailed in the documents attached to the complaint.

As you are well aware, federal election laws limit who can contribute to federal campaign committees and what federal committees can do with their existing funds in order to ensure transparency and candor with donors and voters.

Based on my expertise and long career at the FEC and FPPC dedicated to protecting the integrity of election law, it is clear to me that in the name of being “tough on crime,” proponents of the proposed ballot initiative to roll back justice reform may themselves have committed crimes by violating federal laws and regulations. I urge the General Counsel’s Office of the FEC to investigate this matter.

Sincerely,

Ann Ravel

Former Chairperson, Federal Election Commission

Former Chairperson, California Fair Political Practices Commission