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**OFFICE OF GENERAL COUNSEL**

**FEC COMPLAINT**

03 November 2022

**MUR 8087***Via US Mail and E-Mail*

**Office of General Counsel**  
**Federal Election Commission**  
1050 First Street, NE  
Washington, DC 20463  
enfComplaint@fec.gov

**Re: Campaign Finance Violations by Joe Kent for Congress**

To Whom It May Concern:

It is out of concern for the integrity of the United States' democracy, and legal and regulatory requirements for the financing and operation of federal political campaigns that I submit the below discussed Complaint. Serious questions have surfaced regarding whether Joe Kent, a candidate for Congress in Washington State, has committed multiple major campaign finance, ethics and disclosure violations.

Joseph Kent is a candidate for the United States House of Representatives for the State of Washington's Third Congressional District. He filed his Statement of Organization with the Federal Election Commission for the purpose of running for this position on or about March 3, 2021. On February 3, 2022, he filed his first Financial Disclosure Report with the United States House of Representatives Committees. Subsequent Financial Disclosure Reports that were filed show irregularities not only in the name of the employer but also amount that Joe Kent received from the purported employer. There is good reason to believe that Kent has failed to comply with federal legal requirements to accurately disclose his actual employer in filings with the FEC, as well as in required financial disclosures with the House Ethics Committee.

Prior to this, Mr. Kent had been politically active. Between May 2020 and July 2021, Mr. Kent made approximately 34 donations to various federal political committees for a total amount of \$15,563.00. When making the filings for all of those contributions, and is required under federal laws and regulations<sup>1</sup>, Mr. Kent represented that he was an employee of a company called, "American Enterprise Solutions". However, the said company does not appear to exist or is at least is not registered to do business in Washington State. While I do not at all contest Mr. Kent's right(s) to participate in influencing the elections of this nation, I have significant concern that was not truthful in listing his employer for the above discussed disclosures.

Next, in running for the above discussed Congressional position, Mr. Kent has repeatedly claimed that he was employed by "American Enterprise Solutions" at public events and/or

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*See 11 CFR § 100.12. See also 52 USC § 30101(13).*

rallies. In legally required filings with the United States House of Representatives Ethics Committees, since February 3, 2022, he has claimed to have received income from “American Enterprise Solutions”, starting with \$105,000.00 for the preceding year, and the same amount for the year to date. In a second disclosure report filed on April 19, 2022, he claimed to have received \$32,307.32 for the year to date from the same source, and \$122,110.36 for the preceding year.

Next, after inconsistencies arose in late October 2022, Mr. Kent submitted an additional financial disclosure report on October 25, 2022, in which he changed the name of his purported employer to, “Advanced Enterprise Solutions”, and claimed that he had received \$105,000.00 in income during the current filing year, and similarly, \$105,000.00 in income during the preceding year.

In an odd move, on October 25, 2022, an additional financial disclosure report was filed in which Mr. Kent claimed that his employer was, “Advanced Enterprise Solutions”, and that he had received \$32,307.32 as a “salary,” and \$122,110.36 for the preceding year.

Multiple media reports, however, cast significant doubt on the veracity of Joe Kent’s amended filings, including raising whether “Advanced Enterprise Solutions” is an actual ongoing and active business, whether Joe Kent has actually provided any labor or work product to this entity, and whether this “business” has illegally provided financial and other campaign supports, including paying for polling research to directly benefit his campaign. For example, in an October 27, 2022 [story published in the Daily Beast](#) national online news site, Kent’s former campaign manager is quoted as saying the following about Kent’s purported employment:

Conservative operative Byron Sanford told The Daily Beast that Joe Kent never dedicated a single hour to his reported role as a project manager for a tech firm in all the grueling months he ran the campaign up until the candidate axed him amid internal disputes in December of last year. Nonetheless, the Donald Trump-backed contender reported to the House Ethics Committee that he had earned a \$122,110.36 salary in 2021 from a company called “American Enterprise Solutions,” which he stated in an earlier filing was his full-time job...

But Sanford alleged that, at least from the start of his campaign in early 2021, Kent was not logging any hours for any project other than his own bid to unseat Rep. Jaime Herrera Beutler (R-WA). “I made his schedule, there simply wasn’t any time in the day,” Sanford said, adding that Kent told volunteers that he had “light hours” thanks to an arrangement with his company’s owner. “I think he’s just paid a six-figure salary so he can campaign.”

Moreover, an October 25 [story posted on the website of Oregon Public Broadcasting \(OPB\)](#) reported that: “little is known about [Advanced Enterprise Solutions] and its leadership. Those murky details, coupled with Kent’s career stints with the Green Berets and the CIA, have raised questions among critics and national media about who exactly supports Kent financially, including suggestions he’s working for the CIA or a private benefactor.” The OPB story adds that the company’s business license in Virginia was inactive and a law firm that the Kent campaign said represented the company refused to even provide the company’s name, stating only that Kent “is employed by a US company.”

A Nov. 2 story in The Columbian raised further questions about the company supposedly employing candidate Kent. The paper reported that "Advance Enterprise Solutions" lists a phone number that "matches a company called Torres Advanced Enterprise Solutions LLC... Torres Advanced Enterprise Solutions LLC lists three offices, one of which matches the address listed for Advanced Enterprise Solutions LLC... There are Twitter and Facebook accounts for Torres Advanced Enterprise Solutions LLC, both of which appear to be inactive."

Also, according to the Daily Beast story cited above, Kent's former campaign manager also alleges that, "Kent revealed that his employer would finance a survey by Trafalgar Polling of voters in the House district. No payments of any kind to Trafalgar appear in Kent's reports to the FEC, and the firm did not respond to repeated requests for comment by The Daily Beast."

Between the inconsistencies of the financial disclosure reports, and the media reports cited above, I have significant concern that "American Enterprise Solutions", and/or "Advanced Enterprise Solutions" may be a form of a "shell company" or donor that is actively supporting and contributing to Mr. Kent and his campaign in violation of federal laws. Indeed, there is significant recently unearthed evidence to support the conclusion that Kent may be, in a major violation of campaign finance and disclosure laws, being paid a six figure income by a person or persons unknown specifically to campaign for office, initially against incumbent 3<sup>rd</sup> Congressional District Rep. Jaime Herrera Beutler, and then, after Herrera Beutler was defeated in the primary, against general election opponent Marie Gluesenkamp Perez.

I believe that these significant unanswered questions regarding Mr. Kent's employer, the work he is providing for them, and whether that "employer" has been engaged in illegally assisting his campaign with large-scale unreported contributions, all raise serious ethical and disclosure concerns and cry out for further comprehensive examination. Therefore, I respectfully ask that the Federal Elections Commission commence an investigation of Mr. Kent and his campaign's compliance with federal campaign finance laws.

Please let me know if you have any questions.

Very Truly,



David Nierenberg

PO Box 1164  
Washougal, WA 98671

Notarization

SUBSCRIBED AND SWORN to before me this 3<sup>rd</sup> day of November 2022  
at Houston, TX USA

Notary Public for the State of Texas

My Commission expires: 10/19/23

