

**American Democracy Legal Fund
455 Massachusetts Avenue, Northwest
Washington, DC 20001**

September 8, 2014

Honorable Barbara Boxer, Chair
Honorable Johnny Isakson, Vice Chair
Senate Select Committee on Ethics
Hart Building, 2nd & C Sts., NE
Room 220
Washington, DC 20510

Re: Complaint against Terri Lynn Land

Dear Chair and Vice Chair:

Under Rule 2 of the Rules of Procedure of the Senate Select Committee on Ethics, this letter is a complaint against Terri Lynn Land, a candidate for the United States Senate in the state of Michigan, for violation of the Ethics in Government Act ("EIGA") and Senate Rule 34. Ms. Land has failed to disclose required information about her personal finances and positions on her public financial disclosure reports.

Terri Lynn Land became a candidate for the U.S. Senate in Michigan on July 1, 2013. Pursuant to the Ethics in Government Act of 1978, as amended, she filed Personal Financial Disclosure Reports ("Reports") on August 2, 2013 and May 15, 2014. When doing so, she certified that the statements made in the reports were true, subject to criminal penalty under 18 U.S.C. § 1001.

On her Report filed August 2, 2013, which included activity from January 1, 2012 until July 30, 2013, Ms. Land disclosed as follows:

- Liquid assets consisting of:
 - One personal checking account valued at between \$15,001 and \$50,000;

- Notes receivable valued at between \$100,001 and \$250,000 from a management company she owns; and One pension listed at an unascertainable value.
- Illiquid assets consisting of:
 - A management company valued at between \$500,001 and \$1 million; and
 - Retirement plan assets valued at between \$147,007 and \$380,000.

On her Report filed May 15, 2014 , which included activity from January 1, 2013 until May 15, 2014, Ms. Land disclosed as follows:

- Liquid assets consisting of:
 - Two personal bank accounts valued at between \$15,001 and \$50,000 each;
 - Notes receivable valued at between \$15,001 and \$50,000 from a management company she owns; and
 - One pension listed at an unascertainable value.
- Illiquid assets consisting of:
 - A management company valued at between \$500,001 and \$1 million; and
 - Retirement plan assets valued at between \$146,006 and \$365,000.

There were no reported jointly held assets with her spouse listed on either report, other than joint ownership of a property with no value or valued at less than \$1,001 disclosed on her 2013 Report only. In particular, she disclosed no interest in her family's real estate company, Land & Co.

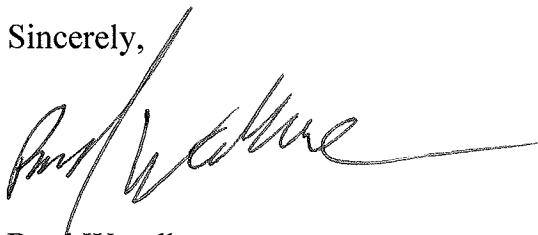
Between August 13, 2013 and June 30, 2014, Ms. Land contributed a total of \$2.9 million to her campaign for the United States Senate, as disclosed in her campaign's reports filed

with the Federal Election Commission. By law, these funds were required to be from her "personal funds," not funds owned solely by her spouse. *See* 11 C.F.R. § 110.10. And yet Ms. Land's Report filed on August 2, 2013 did not disclose nearly enough solely or jointly-held assets to permit her to make contributions of this amount. Moreover, the 2014 Report did not disclose any significant disposal of assets that would have resulted in enough money to make these contributions. As a natural result, there was a firestorm of questions from the press regarding the true source of these contributions.

After the media inquiry, Ms. Land amended her 2014 Report on July 24, 2014. The only substantive change to her assets was to amend the value of one of her bank accounts from \$15,001-\$50,000 to \$50,001-100,000, and to note that it was jointly held with her husband. Her amended report disclosed no other additional assets owned by her. Her campaign has stated that this amended account was the source of the \$2.9 million she has contributed to her campaign. Even if that were the case, she has, to this day, not amended her 2013 Report to disclose assets significant enough for her to have made \$2.9 million in contributions to her campaign.

The above facts indicate that it is likely that Ms. Land has hidden the sources of her campaign funding. By failing to file truthful Reports, Ms. Land has violated both the statute and Senate rules. I respectfully request that the Senate Select Committee on Ethics investigate this matter immediately.

Sincerely,

A handwritten signature in black ink, appearing to read "Brad Woodhouse", with a long horizontal flourish extending to the right.

Brad Woodhouse,
Treasurer