BEFORE THE FEDERAL ELECTION COMMISSION

Complaint against

MINOCQUA BREWING COMPANY SUPERPAC,
MINOCQUA BREWING COMPANY,
KIRK BANGSTAD, and
SARAH YACOUB
Respondents

Complainant Jordan Moskowitz makes this complaint before the Federal Election Commission ("FEC") seeking an investigation and enforcement action against the Minocqua Brewing Company SuperPAC ("MBC SuperPAC"). Complainant alleges as follows:

1. Complainant Jordan Moskowitz is an elector and resident of the State of Wisconsin.

2. Minocqua Brewing Company SuperPAC is registered with the Federal Election Commission as an independent expenditure only committee with a Statement of Registration first filed on January 3, 2021.

3. Minocqua Brewing Company is a corporation registered with the State of Wisconsin.

4. Kirk Bangstad is the registered Treasurer of the MBC SuperPAC, and, upon information and belief, is also the sole owner of Minocqua Brewing Company.

5. Sarah Yacoub is the Executive Director of the MBC SuperPAC, according to a March 21, 2021 post on the MBC SuperPAC Facebook page. See Attachment A.

6. Kirk Bangstad, by his activities conducted through Minocqua Brewing Company and the MBC SuperPAC, and Sarah Yacoub, as Director of the MBC SuperPAC, have exhibited a pattern of violations of the Federal Election Campaign Act of 1971, as amended ("the Act").

7. According to the Minocqua Brewing Company's website, the company purports to donate 5% of all profits to the MBC SuperPAC. See Attachment B.

8. Minocqua Brewing Company is acting as a conduit by soliciting contributions to the MBC SuperPAC through the sale of its products, but has failed to disclose the names of these donors whose funds it purports to have transferred to the MBC SuperPAC.

9. By advertising a promise to donate 5% of profits to the MBC SuperPAC, Mr. Bangstad is using the existence of the committee to personally profit through an attempt to increase sales of beer and company merchandise. Apart from an initial $1,000 contribution made to fund the committee on January 8, 2021, however, the MBC SuperPAC failed to disclose any transfer of 5% of profits from the Minocqua Brewing Company on its regularly scheduled 2021 Mid-Year Report filed on July 30, 2020. It follows that either
the Respondents misappropriated intended donor contributions for private benefit, or the MBC SuperPAC filed a false report which failed to report receipt of these funds.

10. On January 4, 2021, one day following the registration of the MBC SuperPAC, Kirk Bangstad disseminated a mass email mailing which originates from his Minoqua Brewing Company corporate email address (“January 4th Email”). See Attachment C.

11. The January 4th Email is a communication that expressly advocates for the defeat of clearly identified candidates. The email states, in part, “I’m creating a SuperPAC to help defeat these people in 2022...Ron Johnson, Tom Tiffany...” which meets the definition of an independent expenditure under 11 CFR 100.16.

12. The MBC SuperPAC failed to file a 48 Hour Report to disclose this communication as an independent expenditure.

13. The MBC SuperPAC failed to report the independent expenditure on Schedule E of its regularly scheduled 2021 Mid-Year Report.

14. The MBC SuperPAC failed to report an in-kind contribution from the Minoqua Brewing Company for use of its resources in creating and disseminating the January 4th Email, development of the committee website, and other expenditures.

15. The January 4th Email did not bear the federal disclaimers required by 11 CFR 109.11 and 110.11.

16. Both the January 4th Email and the Minoqua Brewing Company websites solicit contributions for the SuperPAC but do not bear the required federal disclaimer notices for solicitations.

17. Upon information and belief, the January 4th Email was sent, in part, to lists owned by other political committees for which no purchase or rental is reported on MBC SuperPAC’s 2021 Mid-Year Report.

18. The January 4th Email displays a photograph of the Minoqua Brewing Company using its business as a billboard in support of Joe Biden’s presidential campaign committee, one early example of the company’s impermissible use of corporate funds to provide direct support to federal candidates.

19. Minoqua Brewing Company is acting as a conduit by soliciting and earmarking contributions to the Minoqua Brewing Company SuperPAC through the sale of its products, but has failed to disclose the names of these donors whose funds it purports to have transferred to the MBC SuperPAC.

20. On its regularly scheduled 2021 Mid-Year Report, the MBC SuperPAC reports a number of expenditures for Digital Advertising, Billboard Signs, Radio Advertising, Advertising, Media Production and Canvassing Services for which no independent expenditure or direct contribution is disclosed.
21. Mr. Bangstad, in his capacity as Treasurer for the MBC SuperPAC, failed to use best efforts to maintain and report accurate records of vendor address and donor employer and occupation information. Most notably, Mr. Bangstad and the MBC SuperPAC failed to report the address for its own Executive Director, Sarah Yacoub on the 2021 Mid-Year Report.

The above-referenced activity by Kirk Bangstad, Sarah Yacoub Minocqua Brewing Company and the Minocqua Brewing Company SuperPAC is contrary to the Act.

WHEREFORE, Complainant respectfully requests that the Federal Election Commission commence an investigation into the actions of Kirk Bangstad, Sarah Yacoub, Minocqua Brewing Company and the Minocqua Brewing Company SuperPAC in regard to these actions; commence an action in civil court with respect to any civil violations; refer any criminal violations to the appropriate prosecutorial authorities; and render such other relief that the Federal Election Commission may deem just and equitable.

Dated this 29 day of September, 2021.

[Signature]

Jordan Moskowitz

CERTIFICATION

I, Jordan Moskowitz being first duly sworn upon oath, state that I personally read the above complaint and that the above allegations are true and correct based on my personal knowledge and, as to those allegations stated on information and belief, I believe them to be true.

[Signature]

Jordan Moskowitz

State of Wisconsin

County of [Name]

Signed and sworn to before me this 29 day of September 2021.

[Signature]

Notary Public or Person Authorized to Administer Oaths

My commission expires 5-2-23

Or, ___ is permanent.
Ms. Jacoby, who is running for the first time, has been working hard to make politics cleaner in Northern Wisconsin and many of our early voters have been energized by her message. She has been working hard to keep fighters for her community, and since her
disillusionment of its former self. By embracing corruption, racism, and a
disorganized shell of its former self, Wisconsin's Republican Party has become a
First, we started the Minocqua Brewing Company Super Pac on January 4th as a
rebirth.

The warmer temps and melting lakes are giving us feelings of revitalization and

March 21

Minocqua Brewing Company
Learn More & Donate Today

SuperPAC, which is "Dark Money Meant for Good," 5% of all our profits go to the Minocqua Brewing Company

MBC SuperPAC
Hey everyone, this is Kirk Bangstad, the owner of the Minocqua Brewing Company.

I'm writing to introduce you to the Minocqua Brewing created in January, 2021—the first month after the most harrowing year I've lived through in my 43 year existence.

2020 was awful because we had a president who purposefully mislead the American public about the deadliness of the Coronavirus pandemic. His lies were trumpeted by his political party and conservative media outlets which caused massive death in our country. Apart from the Trump administration never creating a coordinated federal plan to combat the virus, millions of Americans believed his false oronasacanda. thus refusing to believe the virus was
As well as stop the pain of economic collapse for Wisconsin.

By not doing anything during the COVID-19 crisis, the Republican Party in Wisconsin

COVID-relief relief measures were 3–5.

Legislatures are considered part time. The average times each meet to pass

out of the 100 Full-Time state Legislatures in the U.S. (the other 40 state

Legislature) meet only twice in months to pass a (combined) bill each April.

Republican Senator Mary Felzkowski was part of a Republican majority.

At the state level, Republican Representative Rob Swearer and now-

putting Northwoods of Wisconsin.

democratic institutions of the Republican Party’s now look to home, the
given this context of humanitarian catastrophe and mass destruction to our
country.

victory by invalidating the votes of their fellow Americans are failures to our

These acts, by definition, are treasonous. Those advocating Trump’s unlawful

and the violates that the will of American voters be determined to find him

leaders are perpetuating Trump’s lies that this election was rigged against him

and again, many Republican US Senators, US Congressmen and state party

has lost.

that is absolute but has still been the subject of 67 lawsuits, 60 of which Trump

Biden got 7 million more votes and won the Electoral College 306 to 222, a win

election which has been ruled into an electoral landslide in favor of Joe Biden.

In addition to this Coronavirus catastrophe, America’s democracy has been

Trump’s alternative fact-free reality when they could have stopped it.

dissolved. The Republican Party also hold the Federal and state level

Although Trump was the seminal cause of this uniquely American humiliation

Brazil (19.9K) and India (449K) –

COVID-19. This is more death than the next two deadliest countries combined—

On this day, January 3, 2021, over 350,000 Americans have died from the

their neighbors.
Johnson and our now-Republican Congressman Tom Tiffany, have repeatedly said they would vote to reject President-elect Joe Biden’s victory—a treasonous act against their own country and state.

I believe that the refusal by our state Republican representatives to protect us during Covid, coupled with the treasonous actions of our federal representatives against our democracy, have shown that Republican politicians in the Northwoods are pure poison.

And I’ve decided to do something about it.
We have to stick our necks out because we're being screwed, along with the poor and middle class. Many restless, jumpy, middle-class folks do not feel any help from the government in the last 6 months because Republicans refused to negotiate. Are you still blanket and middle-class? Any questions or real help from any member of Congress, which is not what I was taught. They don't care about us. They are about the huge corporations that they have to appease. They have no respect for small businesses. Yet, the Republican leaders feel just like the corporate world. They don't have a sense of small business or what it takes to run a successful business. I get it. Parliament is red tape.

I also hope this idea grows among small businesses. Who have historically

If you want us to know.

Further contributions to build a case that will hurt these guys just like

I will write a weekly newsletter updating everyone on what we're doing to get the

They're ours.

We're not buying Super PACs. We're using the money of our members to run these campaigns. The wisconsin brewing company will commit 5% of its profits to do this.

Wise use: Many for these campaigns are also donating directly without buying a

Our dark money is not for reelection in 2022.

We need money mean for good. It's Ron Johnson. Tom Tiffany, and Rob

Republicans for reelection at the state and federal levels that will engage with

When the wealthy, the rich people, have Super PACs to buy influence, these people in 2022. The

Since the Wisconsin brewing company is a corporation, we think of the people that

In the case that today, cooperation not just are essential by buying

I will stand with our decision citizens. Let's build something that I can do to

The use of dark money, which was allowed in the aftermath of the historically
off some customers in the process. Losing a few customers in the short term may help us stay alive in the long term as we lean on our representatives to focus on us instead of large corporate donors.

If you agree with me, please donate to the Minocqua Brewing Company SuperPAC. With your help, we will make politics in the Northwoods look a little bit more like our lakes—clean and healthy.

Sincerely,

Kirk

Donate to SuperPAC

Buy Beer

Buy Merchandise