

IOWA ETHICS AND CAMPAIGN DISCLOSURE BOARD

In re the Matter of: Jacob Schrader, Complainant And Concerning: Anthony LaBruna, in the Capacity as Candidate and Treasurer for LaBruna for Iowa, Respondent	FC 2022-08 Order Reprimanding and Issuing Civil Penalty
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THIS MATTER comes before the Iowa Ethics and Campaign Disclosure Board this 3rd day of June 2022, to consider a reprimand and the issuance of a civil penalty.

For the following reasons, the Board hereby reprimands Anthony LaBruna, in the Capacity as Candidate and Treasurer for LaBruna for Iowa, and orders him to pay a civil penalty in the amount of \$400 for failure to disclose the required information on his committee's May 19, 2022, campaign disclosure report.

BACKGROUND

On May 23, 2022, Jacob Schrader filed Formal Complaint 2022-08 alleging that Anthony LaBruna violated Iowa Code chapter 68A from January 2022 to the present. Complainant alleged that Respondent inaccurately filed his May 19, 2022, campaign disclosure report by failing to report contributions and expenditures.

Respondent filed his Statement of Organization with the Board on February 1, 2022. Pursuant to Iowa Code section 68A.401(1)(a), Respondent was required to file his campaign disclosure report for the period of January 1, 2022, to May 14, 2022, no later than May 19, 2022, at 4:30 p.m. Respondent filed part of the report at 2:02 p.m. on May 19, 2022.

The report, in part, states the committee received \$0.00 in contributions and made \$0.00 in expenditures.¹ The report states the total financial activity for the reporting period, including other categories such as cash on hand, was also \$0.00. However, evidence provided by Complainant showed the committee was responsible for various materials during the reporting period which included the attribution statement "Paid for by LaBruna for Iowa."²

On May 26, 2022, the Board voted to accept the complaint and authorized an investigation into the allegations.

¹ See Attachment A. The report states the period covered is January 1, 2021, to December 31, 2021, and that it was due on January 19, 2022. However, Respondent's committee was formed on February 1, 2022, and its first required campaign disclosure report covers the period of January 1, 2022, to May 14, 2022. Respondent later indicated that the filed report was intended to cover the period covering January 1, 2022, to May 14, 2022, despite the inaccurate reporting period and due date listed.

² See Attachment B. Materials included a campaign website, t-shirts, campaign signs, fundraising letters, etc.

INVESTIGATION AND ANALYSIS

FC 2022-08 alleged violations of Iowa Code section 68A.402A for failing to include required information in the campaign disclosure report due May 19, 2022. Respondent was contacted by Board staff on May 27, 2022, about the allegations raised in the complaint. Respondent provided information to Board staff on June 1 and 2, 2022, regarding his committee's financial activities.

Iowa Code section 68A.402A(1)(b) requires a committee to disclose, among other things, the name and mailing address of each person who makes a contribution in excess of \$25 to a candidate for the general assembly. The Board's investigation confirmed the committee did receive contributions that were required to be disclosed. However, Respondent's report did not disclose that information.

Iowa Code section 68A.402A(1)(f) requires a committee to disclose, among other things, the name and mailing address of each person/organization to whom expenditures are made with campaign funds during the reporting period. The Board's investigation confirmed the committee did make expenditures that were required to be disclosed. However, Respondent's report did not disclose that information. Respondent indicated he was unaware of the requirement to report expenditures made with campaign funds.

Furthermore, Iowa Administrative Code rule 351-4.7(2) states "the first disclosure report filed by a committee shall include the relevant financial information covering the period from the beginning of the committee's financial activity through the end of the current reporting period." Respondent's report did not include any relevant financial information for the period of January 1, 2022, to May 14, 2022.

Respondent informed Board staff that he believed the committee's report was successfully filed with all required information. At no time did Respondent contact Board staff for assistance with his filing. Additionally, Respondent did not attempt to amend the report after filing it on May 19, 2022.

Following the investigation into the allegations raised in FC 2022-08, Board staff continues to assist Respondent to bring his committee into full compliance with the campaign laws and rules. In addition to submitting the required financial information absent from the report filed on May 19, 2022, Board staff have identified and have/will assist with additional issues that have come to light including, but not limited to: (1) accidental dissolution of the committee; (2) receipt of an illegal corporate contribution, and; (3) filing of required schedules to fully disclose financial information required by campaign laws and rules.

Those issues and potential violations will be addressed by the Board later. However, our investigation of the violations alleged in FC 2022-08 is complete and the Board has the facts needed to resolve this matter.

CONCLUSION

In this matter, the public has been deprived of information from Respondent that Iowa law requires. The United States Congress and the legislatures of all 50 states have enacted laws requiring that candidates for public office disclose their campaign's

financial activities. The importance of campaign disclosure laws has long been recognized because of the “substantial governmental interests in informing the electorate and preventing the corruption of the political process.”³

In *Buckley v. Valeo*, the U.S. Supreme Court addressed campaign disclosure laws and raised two points we feel compelled to reiterate. First, “recordkeeping, reporting, and disclosure requirements are an essential means of gathering the data necessary to detect violations.”⁴ Second, “[campaign disclosure requirements] appear to be the least restrictive means of curbing the evils of campaign ignorance and corruption.”⁵

For the aforementioned reasons, we find probable cause to believe the LaBruna for Iowa committee violated Iowa Code section 68A.402A and Iowa Administrative Code rule 351-4.7(2) by failing to disclose required financial information for the period of January 1, 2022, to May 14, 2022.

Pursuant to Iowa Administrative Code rule 351-9.4(2), the Board elects to handle this matter by administrative resolution rather than through a contested case proceeding.

IT IS SO ORDERED: In his capacity as Candidate and Treasurer for the LaBruna for Iowa committee, Anthony LaBruna is hereby reprimanded and ordered to pay a civil penalty of \$400. Upon payment of the penalty, FC 2022-08 is dismissed as administratively resolved pursuant to Iowa Administrative Code rule 9.4(2).

Pursuant to Iowa Administrative Code rule 9.4(7), persons assessed a civil penalty through an act of administrative resolution may appeal the decision by requesting, within 30 days of the date of the correspondence informing the person of the Board’s decision, a contested case proceeding to be held under the process set out in the Board’s administrative rules.

BY DIRECTION AND VOTE OF THE BOARD:



James Albert, Chair
Elaine Olson, Vice Chair
Jonathan Roos
Mary Rueter
Daniel Jessop
Leah Rodenberg

SUBMITTED BY:

Zachary S. Goodrich, Executive Director and Legal Counsel

³ *Buckley v. Valeo*, 424 U.S. 1 (1976) at 3

⁴ *Id* at 67-68

⁵ *Id* at 68

CERTIFICATE OF MAILING

This document was sent by electronic mail on this 3rd day of June, 2022, to:

Jacob Schrader, Complainant
Anthony LaBruna, Respondent

DR-2 Disclosure Summary Page

DR-2

LaBruna for Iowa		Status:		Filed
Committee Type:	State Senate	Statutory Due Date	1/19/2022	
County:	O'brien	Adjusted Due Date		
District:	3	Filed Date	5/19/2022 2:02:34 PM	
Committee Code:	2684	Postmark Date		
Political Party:	Republican	Amendment Date	5/19/2022 9:55:46 PM	
Report Date:	2021	Candidate Name: LaBruna, Anthony		

Treasurer

Last Name:	LaBruna	First Name:	Anthony	MI:	
Address:	427 east 3rd st				
City:	Sanborn	State:	IA	Zip Code:	51248
Phone:	(712) 308-8915				
E-Mail:	Anthony@labrunaforiowa.com				

Chairperson

Statement of Cash On Hand

Cash On Hand At Start Of Period	\$0.00
Schedule A: Cash Contributions Total	\$0.00
Schedule F1: Loans Received Total	\$0.00
Schedule H2: Campaign Property Sales	\$0.00
Sub-Total	\$0.00
Schedule B: Expenditure Total	\$0.00
Schedule F2: Cash Loan Repayments	\$0.00
Cash on Hand at End of Period	\$0.00

Additional Assets and Liabilities

Loans In Place at Start of Period	\$0.00
Schedule D: Unpaid Bills	\$0.00
Schedule E: In-Kind Contributions	\$0.00
Schedule F2: Forgiven Loans	\$0.00
Schedule F2: Outstanding Loans	\$0.00
Schedule G: Consultant Breakdown	No
Schedule H1: Campaign Property Value	\$0.00

ATTACHMENT B



This photo is from a post. [View post](#)

LaBruna for Iowa
May 7 at 6:57 PM

1 Like 4 Comments

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Lori Dieken Wiersma
Vote zach Dieken

Like Reply

LaBruna for Iowa
Lori Dieken Wiersma what about LaBruna haha

Like Reply

Lori Dieken Wiersma
LaBruna for Iowa yes you too

Like Reply



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LaBruna for Iowa
May 7 at 6:57 PM

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May 7 at 6:57 PM · 🌐

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Write a comment 🗨️ 📷 📺 📧



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LaBruna for Iowa
February 3 · 🌐

👍 3 1 Comment

👍 Like 💬 Comment ➦ Share 👤

Most relevant ▾

Cathy Ringland Kubo
Wait! There's tee shirts! 🇺🇸

Like Reply 15m

Write a comment 🗨️ 📷 📺 📧



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LaBruna for Iowa
February 3 · 🌐

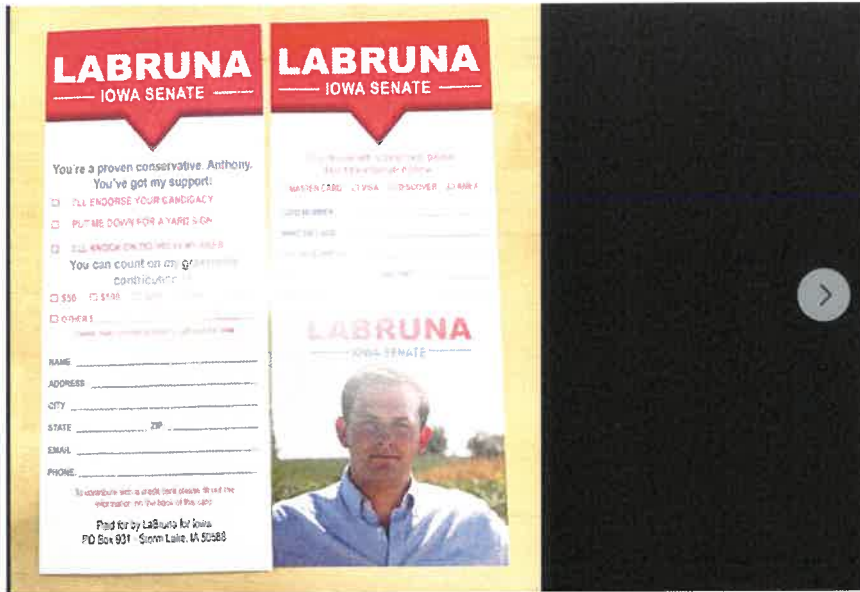
👍 4

👍 Like 💬 Comment ➦ Share 👤

Most relevant ▾

Most Relevant is selected, so some comments may have been filtered out.

Write a comment 🗨️ 📷 📺 📧



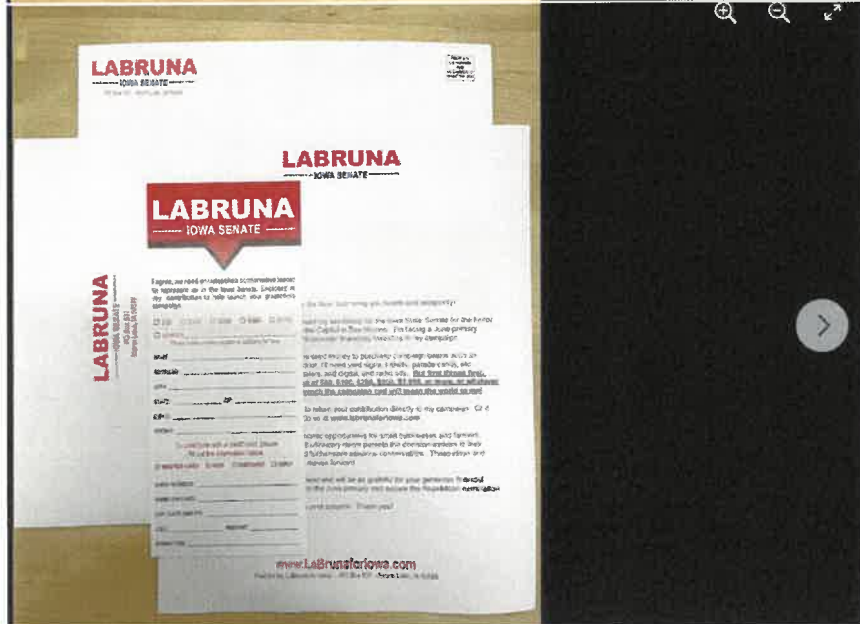
Global Direct Mail & Marketing
February 28

New palm cards for LaBruna for Iowa.

1

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Write a comment...



Global Direct Mail & Marketing
February 1

LaBruna for Iowa's letter is out the door!

4 1 Share

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LABRUNA

IOWA SENATE

Pro-Life
The sanctity of life is one of the most important issues we face today. We must fight for the right to life for all unborn children. It's a reproductive issue that we cannot yet speak. I'm a firm believer we cannot trust until all unborn children are protected.

Second Amendment
Our right to bear arms and protect our families and loved ones is an inalienable right. I'll oppose legislation such as gun registration, limitations on ammunition and gun parts. The right to keep and bear arms shall not be infringed.

Education
I'm the candidate who supports home, private, and public education. The current system fails our students, it fails our teachers, and it fails our communities. We need to start putting students first and give power back to parents. I plan to stand up for school choice which will make parents the decision makers in their child's educational development.

Main Street Economy
Coming from a family of small business owners I know how vital they are to our community. We need to focus more on developing economic opportunities to stimulate job growth, broadband expansion, and tax incentives to encourage overall business investment.

Rural Iowa
Agriculture is essential and we need to support our farmers. A comprehensive economic-development strategy is needed across the state to include upgrades in infrastructure, transportation, safety, and workforce in order to maintain our way of life in rural Iowa.

Elect a Senator who will return your call!
Call me at (712) 385-9315
www.LaBrunaforIowa.com
P.O. Box 421 • Storm Lake, IA 50586

**The Conservative Leader
Our Senate District Needs!**

LABRUNA

IOWA SENATE



Meet Anthony
Anthony LaBruna has served seniors at the local, state, and federal level. As a Congressional aide in Iowa's 4th Congressional District, LaBruna helped introduce veterans and everyday seniors navigate the complex federal government.

More recently, LaBruna was appointed by President Trump to be the White House Liaison to the Department of Commerce under Secretary Wilbur Ross, where he oversaw an annual budget of \$12.2 billion in discretionary funds to help manage the U.S. Census, investment trade tariffs, and spend time safeguarding that amendment rights. He also provided oversight for over 225 personnel at the department to ensure high-priority executive directives.

www.LaBrunaforIowa.com
anthony@labrunaforiowa.com



Global Direct Mail & Marketing
January 25 · 🌐

Palm cards ready to be handed out for LaBruna for Iowa.

4

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LABRUNA

IOWA SENATE

Anthony LaBruna Announces Candidacy for Iowa State Senate

December 1, Des Moines, Iowa — Anthony LaBruna announced today he is running to represent Iowa's 4th District State Senate seat. LaBruna most recently served as President Trump's White House Liaison to the United States Department of Commerce. In this role, he worked alongside Senior Policy Personnel to advance America's interests in International Trade Administration (ITA), Economic Development (EDA), Census Bureau, and the National Telecommunications Information Administration (NTIA).

"America is on the wrong track, our economy is being neglected by this administration and its ineffectual policies. I have represented the 4th Congressional District of Iowa for many years, serving the needs of everyday Iowans on the local, state, and federal level. I plan to continue this pattern of service in Des Moines," said LaBruna.

LaBruna spent fourteen years working, listening, and solving everyday problems for Iowans in the 4th Congressional District office alongside Congressman Steve King. During this time, he worked to ensure veterans receive health benefits, acted as a resource for small business owners, and state wide Iowa agriculture policies provide the highest return on corn, soybeans, milk and eggs.

"It's advocating for subsidies for ethanol when we need it most, and working to reduce costs for all of our producers, agricultural Iowa farmers and the country as a whole," said LaBruna.

LaBruna offers an understanding of the legislative process. He clerked in the State Legislature for three years, focusing most of his time on safeguarding First Amendment rights, easing regulations on farmers and small businesses, and promoting public safety initiatives.

LaBruna will bring a fresh perspective to the state as states-also Republicans have been unsuccessful at solving critical issues such as education reform, creating inflation, and weakened borders throughout Iowa. He will also be focused on providing public relations to the district's core problems that relate to internet accessibility, agriculture, and economic development.

"I know what it will take to keep Iowa moving in the right direction. I care deeply about my community and everyone in this great state. I'm ready to fight for conservative values and fundamental freedoms for every citizen and the generations to come," said LaBruna.

As the State Senator, Anthony LaBruna will champion Iowa values. He will work tirelessly to secure the option of school choice, restore faith in our electoral process, and cut wasteful spending.



LaBruna for Iowa
December 1, 2021 · 🌐

We must defend the heartland from the influences of radical ideas that aim to destroy the very bedrock Iowa has raised generations upon. The burden of preserving THE AMERICAN WAY rests upon our shoulders and ours alone. The hour of action is now!

17 4 Comments 11 Shares

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Joanna Miller
Yes!!!!
Like Reply 24w

Most Relevant is selected so some comments may have been filtered out.

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