STATEMENT OF FACTS

William Christopher McCollum ("McCollum") began working as Treasurer for the campaign finance entity "Friends of Cathy Bevins" on June 14, 2014. After sharing the role with his partner, he became the exclusive Treasurer of the account from June 24, 2014 to August 16, 2022. As Treasurer, McCollum was responsible for the finances of Friends of Cathy Bevins, which included depositing checks and documenting expenditures from a Bank of America bank account maintained in the name of Friends of Cathy Bevins.

The Friends of Cathy Bevins was a campaign finance entity, also known as a political committee, which is an organization that falls under Campaign Finance Law and is regulated by Title 13 of the Election Law Article. Campaign finance entities are organizations comprised of two or more individuals with the major purpose of promoting the success or defeat of a candidate, political party, or question. Each campaign finance entity has two responsible officers: a Chairperson and a Treasurer.

McCollum was also the Treasurer for a slate, another form of a campaign finance entity, called the "Baltimore County Victory Slate." The Baltimore County Victory Slate was formed in August 2006 and McCollum has served as Treasurer since July 20, 2015 through the present. Like in a campaign finance entity, McCollum was responsible for the finances of the Baltimore County Victory Slate, which included depositing checks and documenting expenditures from a bank account maintained in the name of the Baltimore County Victory Slate. Unlike a regular campaign finance entity, candidates who are members of a slate can receive unlimited amounts of money from other members of the slate. However, like a regular campaign finance entity, the Treasurer manages those accounts and those funds, and the entity must report the donations, expenditures, transfers, etc. The members of the Baltimore County Victory Slate included: Cathy Bevins, James "Jim" Smith, Julian Jones, and John Olszewski, among others.

To ensure transparency and accountability in campaign finance entities, reports are required to be filed at least once a year and as many as six times in an election year. A Campaign Finance Report is a detailed accounting of contributions, transfers, expenditures, outstanding obligations, and loans by a political committee. All committees must electronically file their campaign finance reports with the State Board of Elections on approved software. The reports are filed under the penalties of perjury and an e-signature is required at the time of the submission. These reports and the accounts that support the reports are the responsibility of the Treasurer and not the candidate.

McCollum, who lived and worked in Baltimore County during this time, would submit the forms electronically and sign the reports for Friends of Cathy Bevins and Baltimore County Victory Slate under the penalties of perjury while in Baltimore County.

The law guides permissible expenditures from campaign finance entities and, at a minimum, those expenditures have to be for the benefit of the campaign. These funds cannot be used for personal expenditures or the personal benefit of the responsible officers, including the Treasurer.

Friends of Cathy Bevins

McCollum maintained a personal American Express credit card that was not associated with the Friends of Cathy Bevins campaign entity. McCollum used the Bank of America checking account associated with Friends of Cathy Bevins to pay his American Express bill. Specifically, between on or about June 22, 2016 and February 4, 2020, McCollum in his capacity as Treasurer, used the Bank of America checking account associated with Friends of Cathy Bevins to pay \$64,189.89 toward his personal American Express bill. On several occasions, the amounts paid were the exact minimum due on his credit card account.

In addition to paying his personal credit card, between on or about April 23, 2015 and January 9, 2018, McCollum in his capacity as Treasurer, wrote checks to various business accounts purported to be related to the campaign. McCollum directly deposited those checks into his personal checking account at Bank of America. The deposits totaled \$13,425.00.

Additionally, McCollum directly transferred funds out of the campaign account of Friends of Cathy Bevins to himself. Between on or about January 31, 2020 and November 16, 2020, McCollum in his capacity as Treasurer, electronically transferred funds from the Friends of Cathy Bevins campaign finance account to his personal Bank of America account totaling \$5,000.

One of the duties of the Treasurer is to manage checks made payable to the campaign finance entity. McCollum, on several occasions, deposited checks made payable to Friends of Cathy Bevins directly into his personal account. The amount totaled \$28,400.

McCollum submitted reports on behalf of the Friends of Cathy Bevins and the transactions described above were not reported as required under Title 13, nor were they permissible expenditures.

Baltimore County Victory Slate

McCollum also used funds from the Baltimore County Victory Slate for personal enrichment by transferring funds from the slate, to the Friends of Cathy Bevins account, and then to his personal account. Friends of Cathy Bevins was one of the campaign finance entities associated with the Baltimore County Victory Slate, meaning that unlimited funds from the slate could be transferred to Friends of Cathy Bevins.

As he did with the Friends of Cathy Bevins account, McCollum also used funds from the Baltimore County Victory Slate to pay his personal American Express credit card bill. Between on or about November 8, 2018 and December 14, 2018, McCollum, in his capacity as Treasurer, misused the Bank of America checking account associated with the Baltimore County Victory Slate to pay \$6,846.48 toward his personal American Express bill totaling \$6,846.48.

Like McCollum did with Friends of Cathy Bevins, McCollum also, between July 6, 2015 and April 8, 2019, wrote checks to various purported vendors which were directly deposited into his personal checking account at Bank of America totaling \$20,123.15.

Also, on or about May 2, 2018, McCollum deposited checks totaling \$4,300, which were made payable to Baltimore County Victory Slate political committee, into his personal Bank of America account via ATM Deposit.

The aforementioned transactions were not reported on any of the required campaign finance reports, including the 2016 Pre-General Report. The transactions and expenditures are material to the requirements of the Report. The Report was signed by McCollum under the penalties of perjury on January 20, 2021 and submitted to the Maryland State Board of Elections.

If called to testify, witnesses would identify McCollum as the Treasurer of Friends of Cathy Bevins and the Baltimore County Victory Slate. All events occurred in Baltimore County, Maryland.