

**BARBARA K. CEGAVSKE**  
*Secretary of State*

STATE OF NEVADA

**JEFFERY LANDERFELT**  
*Deputy Secretary  
for Commercial Recordings*

**SCOTT W. ANDERSON**  
*Chief Deputy Secretary of State*



**SCOTT F. GILLES**  
*Deputy Secretary for Elections*

**GAIL J. ANDERSON**  
*Deputy Secretary  
for Southern Nevada*

**OFFICE OF THE  
SECRETARY OF STATE**

**WAYNE THORLEY**  
*Deputy Secretary  
for Operations*

February 2, 2015

Tony Dane, Registered Agent & Chairman  
CRC PAC  
1725 South Rainbow Street, Suite 16-53  
Las Vegas, NV 89146

**VIA CERTIFIED MAIL**

*And*

Tony Dane  
Dane & Associates, Inc.  
Post Office Box 1058  
Front Royal, VA 22630

**Re: Alleged Violation of Election Law  
File C15-01 SOS**

Dear Mr. Dane:

This office is in receipt of the above-captioned complaint, received January 28, 2015, wherein it is alleged you made contributions in the name of another, in violation of Nevada Revised Statutes (NRS) 294A.112, from Dane & Associates to CRC PAC, a committee for political action registered with this office (hereinafter, "CRC"). The Secretary of State, as the Chief Elections Officer for the State of Nevada, is responsible for enforcement of the election laws contained in Title 24 of the NRS, of which NRS Chapter 294A is a part. A copy of the complaint is enclosed.

According to the Secretary of State's records, CRC reported \$240,000.00 in contributions from Dane & Associates in December of 2014, including a lump sum contribution of \$200,000.00 dated December 30, 2014. Based on comments attributed to you in an article that is the basis for the alleged violation, it appears all or part of the \$200,000.00 contribution was funded by "several clients" interested in pursuing recall efforts against legislators. However, the Contributions & Expenses (C&E) Report filed with this office only states that it was a contribution from Dane & Associates. The report does not disclose the names and addresses of the "several client" contributors.

**NEVADA STATE CAPITOL**  
101 N. Carson Street, Suite 3  
Carson City, Nevada 89701-3714  
Telephone (775) 684-5708  
Fax (775) 684-5725

**COMMERCIAL RECORDINGS  
MEYER'S ANNEX OFFICE**  
202 N. Carson Street  
Carson City, Nevada 89701-4201  
Telephone (775) 684-5708  
Fax (775) 684-5725

**LAS VEGAS OFFICE**  
555 E. Washington Avenue Ste. 5200  
Las Vegas, Nevada 89101-1090  
SECURITIES  
Telephone (702) 486-2440  
Fax (702) 486-2452  
CORPORATIONS  
Telephone (702) 486-2880  
Fax (702) 486-2888

**RENO OFFICE**  
500 Damonte Ranch Pkwy, Suite 657-A  
Reno, Nevada 89521  
Telephone (775) 687-9950  
Fax (775) 853-7961

Tony Dane  
February 2, 2015  
Page 2 of 2


Based on the reported contributions to CRC and the statements made by you in the article referenced in the complaint, please respond to the complaint allegations in writing and explain why the name and addresses of your clients were not disclosed as contributors.

Furthermore, according to Secretary of State Commercial Recordings Division records, the only Dane & Associates entity (Dane & Associates, Inc., a Nevada corporation) on file has a status of "Permanently Revoked." Please include in your response to this office an explanation of why the revoked entity continues to do business under that status, or whether your company, Dane & Associates, is registered to do business under a different name.

Please submit your response to the Elections Division by no later than close of business on **Friday, February 13, 2015**. If you fail to respond to this inquiry in a timely manner, the complaint file will be forwarded to the Office of the Attorney General for review and further enforcement. Should you have any questions, please contact the undersigned at (775) 684-5705.

Respectfully,

BARBARA K. CEGAVSKE  
Secretary of State

By:   
Scott F. Gilles, Esq.  
Deputy Secretary of State for Elections

cc: Kevin Benson, Esq., Senior Deputy Attorney General