



MICHIGAN REPUBLICANS

September 1, 1999

SEP 9 12:04 PM '99

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
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BY CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

Re: Byrum for Congress (Committee ID: C00344606) and Hilda Curran, Treasurer
MUR 4923

Dear Sir/Madam:

Enclosed for filing please find the original and three (3) copies of the Complaint in the above-referenced matter. If you have any questions, please contact me.

Sincerely,

MICHIGAN REPUBLICAN STATE COMMITTEE

Eric E. Doster
General Counsel

EED/jlk
Enclosures

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BEFORE THE FEDERAL ELECTION COMMISSION

In the matter of:

Byrum for Congress
(Committee ID: C00344606)
and Hilda Curran, Treasurer

MUR 4923

COMPLAINT

NOW COMES the Michigan Republican State Committee by its Executive Director, Gregory R. Brock, (hereinafter referred to as the "MRSC") of 2121 East Grand River, Lansing, Michigan 48912, and hereby files this Complaint pursuant to 2 U.S.C. 437g(a)(1) and 11 C.F.R. 111.4 against Byrum for Congress, Hilda Curran, Treasurer, and states the following:

1. Dianne Byrum is a candidate for Congress in the Eighth District of Michigan.
2. Byrum for Congress is the principal campaign committee for Dianne Byrum.
3. Emily's List (Committee ID: C00193433) is a committee registered with the Federal Election Commission.
4. The New Democrat Network (Committee ID: C00319772) is a committee registered with the Federal Election Commission.
5. 11 C.F.R. 110.6 governs the reporting requirements concerning earmarked contributions, which are contributions directed by a contributor (either orally or in writing) to a clearly identified candidate or his or her authorized committee through an intermediary or conduit.
6. According to 11 C.F.R. 110.6, both the political committee conduit and the recipient committee have reporting obligations in connection with the transmittal and receipt of an earmarked contribution.
7. In its July 1999 Monthly FEC report, Emily's List posted on pages 491 through 622 of Schedule A, 912 contributions totaling \$72,023 as earmarked contributions transmitted to Byrum for Congress.
8. In its 1999 Mid-Year FEC report, the New Democrat Network posted on page 17 of Schedule A, a contribution from a Mr. James Massie totaling \$,000 as an earmarked contribution transmitted to Byrum for Congress.

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9. The 1999 Mid-Year report of Byrum for Congress fails to report the earmarked contributions as disclosed by Emily's List and the New Democrat Network, in violation of 11 C.F.R. 110.6.

REQUEST FOR RELIEF

Based on the foregoing, the MRSC respectfully requests that the Federal Election Commission investigate this violation and determine as a matter of law that Byrum for Congress has violated the regulations of the Federal Election Commission, including but not limited to, 11 C.F.R. 110.6.

Further, the MRSC respectfully requests that the Federal Election Commission conduct a thorough review of the reports filed by Byrum for Congress in order to discover further violations of the regulations of the Federal Election Commission.

Further, the Complainant respectfully requests the Federal Election Commission to assess all appropriate penalties for said violation in accordance with 2 U.S.C. 437g(a)(5)(A), or any other enforcement provisions of the Act.

The above statements are true and accurate to the best of my knowledge, information and belief.

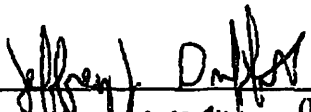
Respectfully submitted,

MICHIGAN REPUBLICAN STATE COMMITTEE

Dated: September 1, 1999


Gregory R. Brock, Executive Director

Subscribed and sworn before me this 1st day of September, 1999.


JEFFREY J. GRIFFITH (Notary Public)
MACOMB COUNTY, ACTING IN Ingham County, Michigan
My commission expires: 09-13-03