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FEDERAL ELECTION COMMISSION

AUGUST 29, 2023 1:14 PM

OFFICE OF GENERAL COUNSEL

Office of General Counsel
Federal Election Commission
1050 1st St., NE
Washington, D.C. 20463

August 27, 2023

Anthony Spangler
[REDACTED]
Horsham, PA 19044

MUR 8161**Re: Violation of Federal Law and FEC Regulations by Mark Houck**

Dear Counsel:

Pursuant to 52 U.S.C. § 30109(a)(1) and 11 C.F.R. § 111.4, please accept this Complaint against Mark Houck ("Houck") for campaigning for federal office in violation of the Federal Election Campaign Act of 1971, as amended (the "Act"), and Federal Election Commission ("FEC" or "Commission") regulations.

Introduction

Mark Houck is a candidate for the U.S. House of Representatives in Pennsylvania's 1st Congressional District for the 2024 election. The FEC's website lists "Mark Houck for Congress" as Houck's principal campaign committee (FEC ID: C00847806) and his campaign operates and solicits political contributions through the website Houckforcongress.com (the "Campaign Website").

The Act and Commission regulations require federal candidates to include a variety of legal disclaimers on campaign materials and solicitations for campaign contributions. Houck's Campaign Website fails to comply with these requirements in several different respects. Additionally, Houck's principal campaign committee has failed to establish a bank or other depository for campaign contributions that meets FEC requirements.

"Paid for" Disclaimer

Up until at least August 14, 2023, the Campaign Website failed to include any disclaimer identifying what federal campaign committee it was sponsored and operated by. [Exhibit 1]. On or around August 23, 2023, the Campaign Website was finally updated to include a "paid by" disclaimer but this belated disclaimer fails to accurately identify the sponsoring campaign committee [Exhibit 2]. It states "Paid for by Houck for Congress" but Houck's principal campaign committee as registered with the FEC is "Mark Houck for Congress."

Campaign Contribution Disclaimers

The Campaign Website includes "donate" links through which individuals are invited to make contributions in support of Mark Houck via Paypal or using their credit or debit cards. Those donate links take individuals to the page shown in Exhibit 3 ("Donation Page"). This Donation Page fails to clearly identify the FEC registered committee to which donations will be attributed to, merely stating that donations will go to "Mark Houck."

Collection of Contributor Information

The Act and FEC regulations require committees to use their best efforts to collect a variety of information from contributors whose aggregate contributions exceed \$200 in an election cycle, including the contributor's mailing address, occupation, and the name of their employer, among other details. The donation page fails to request this required information [Exhibit 4].

Principal Campaign Committee Bank/Depository

The FEC requires political committees to establish a bank account for the deposit of receipts and making of disbursements in order to ensure committee funds are kept separate from personal funds. The Commission requires the bank account to be at either a national bank, a state bank, or a FDIC- or NCUA-insured institution. In the Mark Houck for Congress committee's statement of organization, filed with the FEC on August 10, 2023, [Exhibit 5] the only bank or depository listed is "Paypal," which is not a national bank, state bank, or a FDIC- or NCUA-insured institution.

Conclusion

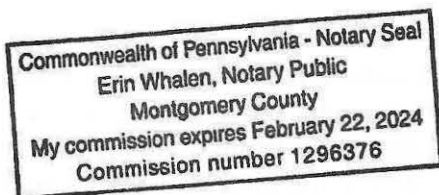
Upon information and belief, and based upon the facts relayed herein, Mark Houck has violated the Federal Election Campaign Act of 1971, as amended, and Federal Election Commission Regulations. Accordingly, I respectfully request that the Commission find reason to believe that a violation has occurred and conduct an immediate investigation into the violation outlined above and impose the maximum penalty under law.

The foregoing is correct and accurate to the best of my knowledge, information and belief.

Respectfully submitted,



Sworn to and subscribed before me this 29 day of August 2023.





Notary Public

My Commission Expires: 2/22/2024

EXHIBIT 1

houckforcongress.com



Mark Houck
FOR CONGRESS



© 2023, Houck for Congress. All Rights Reserved. |

Powered by **Melior**

[Terms of Use](#)

[Privacy Policy](#)

EXHIBIT 2

[Donate](#) [Volunteer](#)

Election Day

242 : 10 : 56 : 32
Day(s) Hour(s) Minute(s) Second(s)

[JOIN THE CAMPAIGN](#)

About Us

Restoring Faith, Family &
Freedom



PO Box 283
Quakertown, PA18951



info@houckforcongress.com

Campaign Information



[Donate](#)



[Volunteer](#)

News & Updates

Gallery



EXHIBIT 3



Donate to
Mark Houck

After submitting, you will be redirected to a form to provide us donor info. This is required for the campaign to collect.

One-Time

Weekly

Monthly

\$0
USD

☐ Add **\$0.00 USD** to help cover the fees.

 **Donate with PayPal**

Donate with Debit or Credit Card

EXHIBIT 4



Donate to
Mark Houck

\$1
USD

+ Write a note (Optional)

Contact Information

Email

Phone number

We'll send a text to confirm your number. In the future, you'll be able to log in without a password using your mobile phone.

Donate with a debit or credit card

Select your Country/Region

United States



Card number

Expires

Security code

Legal first name

Legal last name

Billing Address

Street address

Apt., ste., bldg.

City

State



ZIP code

Save your info and create a PayPal account.



☐ You confirm that you are at least 18 years old and agree to the following terms. You’ve read and agree to [E-Sign Disclosure and Consent](#) to receive all communications electronically. You’ve read and agree to the [User Agreement](#) and [Privacy Statement](#).

Create Account & Donate Now

Cancel and return to Mark Houck

Help & Contact Security Report Inappropriate Content Feedback

English ^

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EXHIBIT 5

**FEC
FORM 1****STATEMENT OF
ORGANIZATION**

Office Use Only

1. NAME OF COMMITTEE (in full) ☐ (Check if name is changed) Example: If typing, type over the lines.

12FE4M5

Mark Houck For Congress

ADDRESS (number and street)

380 Red Lion Rd Ste 103

☐ (Check if address is changed)

Huntingdon Valley

CITY ▲

PA

STATE ▲

19006

ZIP CODE ▲

COMMITTEE'S E-MAIL ADDRESS

☐ (Check if address is changed)

mark@houckforcongress.com

Optional Second E-Mail Address
ateitelman@teitelaw.com

COMMITTEE'S WEB PAGE ADDRESS (URL)

☐ (Check if address is changed)

https://houckforcongress.com/

2. DATE

MM / DD / YYYY
08 / 10 / 2023

3. FEC IDENTIFICATION NUMBER ►

C C00847806

4. IS THIS STATEMENT



NEW (N)

OR



AMENDED (A)

I certify that I have examined this Statement and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer Lepera, Joseph, , CPA

Signature of Treasurer

Lepera, Joseph, , CPA

[Electronically Filed]

Date

MM / DD / YYYY
08 / 10 / 2023

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 52 U.S.C. §30109.

ANY CHANGE IN INFORMATION SHOULD BE REPORTED WITHIN 10 DAYS.

Office
Use
OnlyFor further information contact:
Federal Election Commission
Toll Free 800-424-9530
Local 202-694-1100**FEC FORM 1**
(Revised 06/2012)

5. TYPE OF COMMITTEE:

Candidate Committee:

- (a) ☒ This committee is a principal campaign committee. (Complete the candidate information below.)
- (b) ☐ This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)

Name of Candidate Houck, Mark, Justin, , Sr

Candidate
Party Affiliation

REP

Office
Sought:



House



Senate



President

State

PA

District

01

- (c) ☐ This committee supports/opposes only one candidate, and is NOT an authorized committee.

Name of
Candidate

Party Committee:

- (d) ☐ This committee is a (National, State or subordinate) committee of the (Democratic, Republican, etc.) Party

Political Action Committee (PAC):

- (e) ☐ This committee is a separate segregated fund. (Identify connected organization on line 6.) Its connected organization is a:



Corporation



Corporation w/o Capital Stock



Labor Organization



Membership Organization



Trade Association



Cooperative



In addition, this committee is a Lobbyist/Registrant PAC.

- (f) ☐ This committee supports/opposes more than one Federal candidate, and is NOT a separate segregated fund or party committee. (i.e., nonconnected committee)



In addition, this committee is a Lobbyist/Registrant PAC.



In addition, this committee is a Leadership PAC. (Identify sponsor on line 6.)

- (g) ☐ This committee is an independent expenditure-only political committee (Super PAC).



In addition, this committee is a Lobbyist/Registrant PAC.

- (h) ☐ This committee is a political committee with both contribution and non-contribution accounts (Hybrid PAC).



In addition, this committee is a Lobbyist/Registrant PAC.

Joint Fundraising Representative:

- (i) ☐ This committee collects contributions, pays fundraising expenses and disburses net proceeds for two or more political committees/organizations, at least one of which is an authorized committee of a federal candidate.
- (j) ☐ This committee collects contributions, pays fundraising expenses and disburses net proceeds for two or more political committees/organizations, none of which is an authorized committee of a federal candidate.

Committees Participating in Joint Fundraiser

1.

2.

C

C

Write or Type Committee Name

Mark Houck For Congress

6. Name of Any Connected Organization, Affiliated Committee, Joint Fundraising Representative, or Leadership PAC Sponsor

NONE

Mailing Address

CITY ▲

STATE ▲

ZIP CODE ▲

Relationship: ☐ Connected Organization ☐ Affiliated Organization ☐ Joint Fundraising Representative ☐ Leadership PAC Sponsor

7. Custodian of Records: Identify by name, address (phone number -- optional) and position of the person in possession of committee books and records.

Full Name Lepera, Joseph, , , CPA

Mailing Address 101 West Elm Street Suite 500

Conshohocken

PA

19428

CITY ▲

STATE ▲

ZIP CODE ▲

Title or Position ▼

Accountant

Telephone number

610

862

1998

8. Treasurer: List the name and address (phone number -- optional) of the treasurer of the committee; and the name and address of any designated agent (e.g., assistant treasurer).

Full Name of Treasurer Lepera, Joseph, , , CPA

Mailing Address 101 West Elm Street Suite 500

Conshohocken

PA

19428

CITY ▲

STATE ▲

ZIP CODE ▲

Title or Position ▼

Accountant

Telephone number

610

862

1998

Full Name of
Designated
Agent

Teitelman, Andrew, , ,

Mailing Address

380 Red Lion Rd Ste 103

Huntingdon Valley

PA

19006

CITY ▲

STATE ▲

ZIP CODE ▲

Title or Position ▼

Attorney

Telephone number

267

255

6864

9. **Banks or Other Depositories:** List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of Bank, Depository, etc.

PayPal

Mailing Address

2211 N 1st Street

San Jose

CA

95131

CITY ▲

STATE ▲

ZIP CODE ▲

Name of Bank, Depository, etc.

Mailing Address

CITY ▲

STATE ▲

ZIP CODE ▲