



FEDERAL ELECTION COMMISSION
Washington, DC 20463

Docket (2)

SENSITIVE

MEMORANDUM

TO: The Commission
FROM: Office of the Commission Secretary *KV*
DATE: October 21, 2004
SUBJECT: MUR 5574 - Complaint

The attached document is being circulated for your information.

Attachments

25190261038

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

SENSITIVE

2004 OCT 20 P 1:01

MUR # 5541

AFFIDAVIT OF PAUL CAULEY

The undersigned Paul Cauley, being first duly sworn upon his oath states as follows:

1. There is a billboard hanging from a building in downtown Indianapolis that meets the definition of “electioneering communication”
2. The sign is being displayed within 60 days of an election
3. The sign depicts a recognizable candidate.
4. The sign is displayed publicly and is visible from a major highway.
5. The sign contains no disclaimer language.
6. The FEC is the governing body which has jurisdiction over election complaints.
7. There is a picture of the illegal billboard attached to this affidavit.
8. That these statements are true to the best of his knowledge.

Dated this 19th day of October, 2004.


Paul Cauley

Subscribed and sworn to before me a Notary Public in and for said County and State,
personally appeared Paul Cauley who acknowledged the execution of the foregoing.

WITNESS my hand and Notarial seal, this 19th day of October, 2004.

Kathy S. Renforth
Kathy S. Renforth

My commission expires: 9-16-09



KATHY S. RENFORTH
Notary Public State of Indiana
Resident of Marion County
My Comm. Expires 09/16/2009

Indiana Secretary of State Todd Rokita**Home**

Name Searched On:
Your art here (Legal)

Current Information

Entity Legal Name:
YOUR ART HERE INC.

Entity Address:
1303 S WALNUT ST , BLOOMINGTON, IN 47401

General Entity Information:

Control Number: **2003022500218**
Status: **Active**
Entity Type: **Non-Profit Domestic Corporation**

Entity Creation Date: **2/10/2003**
Entity Date to Expire:
Entity Inactive Date:

There are no other names on file for this Entity.

Registered Agent(name, address, city , state , zip):
**OWEN MUNDY
1303 S WALNUT ST
BLOOMINGTON, IN 47401**

Principals(name, address, city, state, zip - when provided)
**OWEN MUNDY
Incorporator
1303 S WALNUT ST
BLOOMINGTON, IN 47401**

**SHANA BERGER
Incorporator
223 E 1ST ST. APT #3
BLOOMINGTON, IN 47401**

**NATHAN PURATH
Incorporator
553 S WASHINGTON ST
BLOOMINGTON, IN 47401**

**ALYSSA HILL
Incorporator
715 N PARK AVE
BLOOMINGTON, IN 47408**

Transactions:

Date Filed	Effective Date	Type
2/10/2003	2/10/2003	Articles of Incorporation

Corporate Reports:

Years Paid
N/A

Years Due
2004

Additional Services Available:



Generate an official Certificate of Existence/Authorization.
There is a fee of \$20.00 for accessIndiana subscribers and a fee of \$21.42 for credit card users. Example Certificate

(NEW SEARCH)

All the entity information captured by the Indiana Secretary of State, pursuant to law, is displayed on the Internet. For further information, please call our office at 317-232-6576. Copies of actual corporate documents can also be ordered online. If you encounter technical difficulties while using these services, please contact the accessIndiana Webmaster

25190261041

Mr. Paul Cauley
513 S. Mitthoeffer
Indianapolis, IN 46239

October 5, 2004

Federal Election Commission
999 E Street North West
Washington, D.C. 20463

Re: Federal Election Law Violation in the State of Indiana

Dear Commission,

Please accept this as a formal complaint regarding what I believe to be a violation of the federal election law. I have observed a huge sign hanging from a building in downtown Indianapolis that clearly meets the definition of "electioneering communication."

The depiction on the two billboards is a clearly defined candidate, George W. Bush. The billboard is being publicly distributed, as it is clearly visible from one of the busiest interstates running through Indianapolis, and we are within the prescribed sixty (60) day period before an election.

I am requesting the Commission make an expedited investigation into the situation as time is of the essence. I am asking the Commission to:

1. Require the signs be taken down until they are in compliance with the required disclaimer language
2. A fine be assessed against the organization responsible for the billboard
3. An investigation into the not-for-profit status of the organization and whether they are actually a PAC or a Section 527 organization circumventing the campaign finance laws by masquerading as an "art" group.

I have provided color copies of the billboards for your review. The owner of record of the building is Mr. Tom Battista who resides at 5430 N. New Jersey Street, Indianapolis, IN 46220. His phone number is listed as 317-253-2133. The website of the organization is www.yourarthere.org. There is a gentleman who is associated with Indiana University in some capacity named Mr. Owen Mundy who is a Co-founder of the group and his email is listed as omundy@indiana.edu.

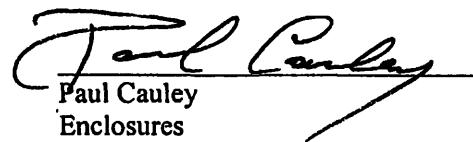
Please keep me apprised of the progress of the investigation and the resolution of this complaint. My contact information is as follows:

25190261042

Mr. Paul Cauley
513 S. Mitthoeffer Road
Indianapolis, IN 46239
bestpatioman@yahoo.com
317-891-1222 (home phone)
317-281-6610 (cellular)

Thank you for your immediate and prompt attention to this matter.

Sincerely,


Paul Cauley
Enclosures

25190261043
STATE OF INDIANA)
) SS:
COUNTY OF MARION)

Before me, a Notary Public in and for said County and State, personally appeared Paul Caulcy acknowledged signing and delivering the foregoing Complaint to the Federal Election Commission of his free and voluntary act and deed.

Witness my hand and Seal this 5th day of October, 2004.


Notary Public: Kathy S. Renforth

Commission Expires: 9-16-09

County of Residence: Marion

KATHY S. RENFORTH
Notary Public State of Indiana
Resident of Marion County
My Comm. Expires 09/16/2006

25190261044

