



FEDERAL ELECTION COMMISSION  
Washington, DC 20463

Docket (2)

**SENSITIVE**

**MEMORANDUM**

**TO:** The Commission

**FROM:** Office of the Commission Secretary *VAV*

**DATE:** October 21, 2004

**SUBJECT:** MUR 5574 - Complaint

The attached document is being circulated for your information.

**Attachments**

25190261038

STATE OF INDIANA )  
 ) SS:  
COUNTY OF MARION )

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL

**SENSITIVE**

2004 OCT 20 P 1:01

MUR #

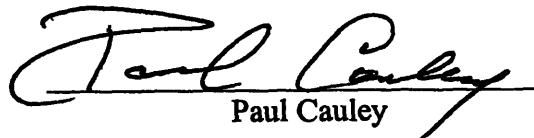
5574

**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 19<sup>th</sup> 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 19<sup>th</sup> day of October, 2004.

  
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

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
SECRETARIAT

2004 OCT 21 A 11:17

65019206152

**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**

25190261040

**Transactions:**


<b>Date Filed</b>	<b>Effective Date</b>	<b>Type</b>
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 <i>accessIndiana</i> subscribers and a fee of \$21.42 for credit card users. Example Certificate
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**(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.

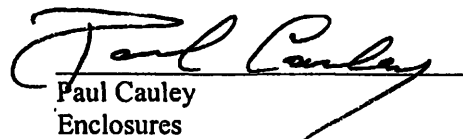
Please keep me apprised of the progress of the investigation and the resolution of this complaint. My contact information is as follows:

25190261042

Mr. Paul Cauley  
513 S. Mitthoeffer Road  
Indianapolis, IN 46239  
[bestpationman@yahoo.com](mailto:bestpationman@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

STATE OF INDIANA                    )  
                                              ) SS:  
COUNTY OF MARION                )

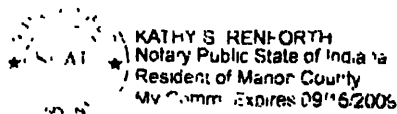
Before me, a Notary Public in and for said County and State, personally appeared Paul Cauley acknowledged signing and delivering the foregoing Complaint to the Federal Election Commission of his free and voluntary act and deed.

Witness my hand and Seal this 5<sup>th</sup> day of October, 2004.

  
Notary Public: Kathy S. Renforth

Commission Expires: 9-16-09

County of Residence: Marion



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25190261044