



# DEMOCRATIC PARTY OF OREGON

*Democracy in Action*

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April 27, 2006

Lawrence Norton, Esq.  
General Counsel  
Federal Election Commission  
999 E Street, N.W., 6th Floor  
Washington, D.C. 20463

MUR # 5747

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL  
2006 MAY 15 A 9 19

Dear Mr. Norton:

This complaint asserts that Mike Erickson and his principal campaign committee, Mike Erickson for Congress, violated the Federal Election Campaign Act (the "Act"), 2 U.S.C. §§ 431. et seq., and related regulations of the Federal Election Commission ("FEC" or the "Commission"), 11 C.F.R. §§ 100.1 et seq. Specifically, Mr. Erickson and his campaign committee have violated the law by filing a false April 15 Quarterly Report with the FEC.

On March 13, 2006, Mike Erickson filed a Statement of Candidacy with the FEC for the office of U.S. Representative in Oregon's 5<sup>th</sup> District. On March 23, 2006, Mike Erickson for Congress filed a Statement of Organization with the FEC to establish Mr. Erickson's principal campaign committee. Subsequently, Mike Erickson for Congress filed its April 15 Quarterly FEC Report for the period January 1, 2006 to March 31, 2006.<sup>1</sup>

The information contained in Mike Erickson for Congress's April 15 Quarterly Report is false. It states that there were no receipts or disbursements by Mike Erickson for Congress, when in fact there were at least \$1,000 in contributions and expenditures on behalf of Mr. Erickson's campaign prior to March 31, 2006. Mr. Erickson is a participant in Oregon's Voters' Pamphlet Program, a voluntary program for candidates in Oregon to receive wide exposure among Oregon voters.<sup>2</sup> A fee of \$1,000 is required for candidates to the U.S. House of Representatives.<sup>3</sup> The filing deadline for participation in the 2006 Voters' Pamphlet was March 9, 2006.<sup>4</sup>

<sup>1</sup> <http://query.nictusa.com/cgi-bin/dcdev/forms/C00422097/210662/>

<sup>2</sup> See [http://www.sos.state.or.us/elections/may162006/guide/rep/erick\\_m.html](http://www.sos.state.or.us/elections/may162006/guide/rep/erick_m.html)

<sup>3</sup> ORS §§ 251.065 and 251.095.

<sup>4</sup> See <http://www.sos.state.or.us/elections/may162006/may162006.htm>

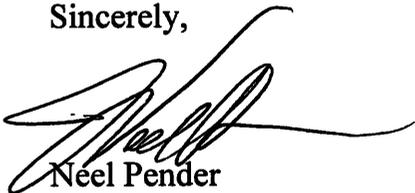
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By failing to disclose both the source of funds for this campaign expenditure and the \$1,000 expenditure itself, Mr. Erickson's campaign committee has violated federal law. Both the Act and Commission regulations require the disclosure of all receipts and disbursements by a federal candidate's principal campaign committee for the relevant reporting period. See 2 U.S.C. § 434(b) and 11 C.F.R. §§ 104.1, 104.3(a)-(b). There is no justification for Mr. Erikson and his campaign's flouting of these disclosure requirements.

For these reasons, the Commission should immediately investigate Mr. Erickson and Mike Erickson for Congress, and determine (1) whether Mr. Erickson and Mike Erickson for Congress have committed a knowing and willful violation of the law, and (2) whether there are other campaign contributions and expenditures that have been withheld from public disclosure, in violation of the Act and Commission regulations. The Commission should seek the highest civil penalties available under the law, and take whatever other action it deems necessary or appropriate under the law.

Sincerely,



Neel Pender  
Executive Director  
Democratic Party of Oregon

(STATE OF OREGON )  
County of Multnomah )

SUBSCRIBED AND SWORN to before me this 2nd day of May,  
2006.



Notary Public

My Commission Expires: 9/27/09

