

FEDERAL ELECTION COMMISSION

In the Matter of: Schwarz for Congress Campaign

COMPLAINT

1. That the Walberg for Congress campaign hereby brings this complaint before the Federal Election Commission seeking an immediate FEC investigation and enforcement action against the Schwarz for Congress Campaign for direct and serious violations of federal campaign finance law.

COMPLAINANT

2. That the Walberg for Congress campaign is dedicated to the ethical practices of the federal election campaign finance law that results through compliance.

RESPONDENTS

3. That the Schwarz for Congress Campaign is a campaign committee subject to the Federal Election Campaign Act and is required to comply with the federal campaign finance law, in particular sections of FEC Regulation 11 CFR 110.11(c)(3)(ii)(A) and (B).

FACTUAL ALLEGATIONS

4. That around July 30, 2006, the Respondent, Schwarz for Congress Campaign began running television advertisement, identified as *Family Results* ad at http://www.schwarzforcongress.com/_IRIS/Documents/Family%20TV-051.wmv
5. That advertisement did not contain a full screen view of the candidate making the disclaimer statement during the disclaimer voice over.
6. That I have personal knowledge of this violation.
7. That the Respondents were aware ads did not comply with federal campaign law.

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 FEDERAL ELECTION COMMISSION
 OFFICE OF GENERAL COUNSEL

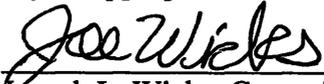
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8. That the Respondents continued to broadcast this specific advertisement or began immediately broadcasting subsequent ads that continued with the same violations of the federal election campaign law.
9. That the violation by the Schwarz campaign was "willfully" and intentionally broadcast in violation of the FEC regulations.
 - a. On July 13th the television stations were notified of the same violation for a previous ad titled *Response* (see attached exhibit of the notification);
 - b. Two of the television stations broadcasting the advertisement immediately responded to the notification by removing *Response* from the air;
 - c. The Respondents not only continued to run the *Response* advertisement, but also initiated subsequent ads, including *Family Results*, that did not comply with the same FEC regulations. On July 17th, the Walberg campaign contacted Schwarz campaign asking them to correct their ads.

11. That the Respondent has continued to willfully and intentionally violate the Federal Election Commissions regulations in complete disregard for the letter and spirit of the regulations.

WHEREFORE, Walberg for Congress Campaign requests that the Federal Election Commission conduct an investigation into these allegations, declare the Respondent to have violated the federal campaign finance laws, impose sanctions appropriate to these violations and to take such further action as may be appropriate.



Joseph L. Wicks, Campaign Manager
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STATE OF MICHIGAN)
) ss.
COUNTY OF JACKSON)

Subscribed and sworn to before me, a notary public, by Joseph L. Wicks, on the
4 day of ~~July~~, 2006,
 August


_____, Notary Public

Jackson County, State of Michigan
My Commission Expires: 11/7/2008

MICHAEL J. JORS
NOTARY PUBLIC - STATE OF MICHIGAN
COUNTY OF JACKSON
MY COMMISSION EXPIRES 11/07/2008
Acting in the County of Jackson

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