

April 17, 2015

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Office of General Counsel
Federal Election Commission
999 E Street, NW
Washington, DC 20463

2015 APR 21 P 3:44

2015 APR 24 P 1:07

OFFICE OF GENERAL COUNSEL

MUR # 6935
SENSITIVE

Re: Daniel Donovan and Donovan for Congress

To the Office of General Counsel:

Pursuant to 2 USC § 437g(a)(1) and 11 CFR § 11.4, please accept this letter as a complaint against Daniel Donovan ("Donovan") and Donovan for Congress ("the Committee") for operating in violation of the Federal Election Campaign Act of 1971, as amended (the "Act"), and Federal Election Commission ("FEC" or "Commission") regulations.

I. Facts

Donovan for Congress is the authorized principal campaign committee for Daniel Donovan, a candidate running in the special election in New York's 11th Congressional District. The Committee filed an FEC Form 1 Statement of Organization on January 23, 2015 for the 2015 special election. Donovan filed his FEC Form 2 Statement of Candidacy with the Commission on January 23, 2015, and filed an amended version of that FEC Form 2 Statement of Candidacy on March 6, 2015.

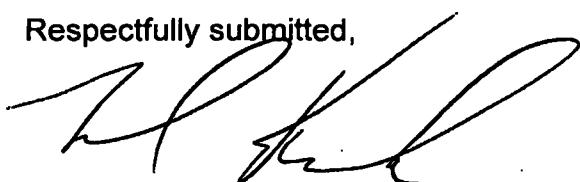
As the campaign for the special election for New York's 11th Congressional District proceeds the campaigns have engaged with proliferating public materials across the district in an effort to garner support for their respective candidacy. Donovan has several versions of banners, window signs, and 2' by 4' corrugated lawn/fence signs that have no "Paid for by" disclosure anywhere on them. See Attachment 1 (emphasis added). This would be a clear violation of 11 CFR 110.11(c)(2)(i), (ii) and (iii) which clearly states that *"On printed materials, the disclaimer notice must appear within a printed box set apart from the other contents in the communication. The print must be of a sufficient type-size to be clearly readable by the recipient of the communication, and the print must have a reasonable degree of color contrast between the background and the printed statement."*

II. Conclusion

Upon information and belief, and based upon the facts relayed herein, Daniel Donovan and Donovan for Congress have violated the Federal Election Campaign Act of 1971, as amended and Federal Election Commission regulations. Accordingly, we respectfully request that the Commission conduct an immediate investigation into the violations 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,



Michael Jude

Staten Island, NY 10301

Sworn to and subscribed before me on this 17th day of April, 2015.


John Meh
Notary Public

DHARMA N. MEH, A
Notary Public, State of New York
No. 01ME6233950
Qualified in Queens County
Certificate Filed in New York County
Commission Expires Jan 03, 2015

Attachment 1

