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COMPLAINT Before the Federal Election Commission

Now comes Paul M. Elvig of 315 138th Place, S.E., Everett, Washington 98208, alleging multiple violations of federal election law by Margaret Cammermeyer and the Cammermeyer 2 Congress committee (FEC ID C00331538). This Complaint is brought pursuant to 2 U.S.C. section 437g(a)(1).

Margaret Cammermeyer is the Democratic candidate for United States Congress in the Second District of Washington, having filed her first Statement of Organization with the Federal Election Commission on November 28, 1997. Cammermeyer 2 Congress ("C2C") is Ms. Cammermeyer's principal campaign committee. As is demonstrated below, Cammermeyer and C2C have violated federal election law.

Over the first three months of 1998, Cammermeyer raised \$258,338.51 in campaign contributions. Cammermeyer specifically reported (itemized) 377 separate contributions to her campaign committee from individuals, almost all of which exceeded \$200 for the calendar year. *See C2C April 15, 1998 FEC Report*. However, Cammermeyer listed the occupation and name of employer for only 37% of her donors on C2C's April FEC disclosure report. Specifically:

- Cammermeyer listed the name of employer 139 times but failed to include this legally required information 238 times
- Cammermeyer reported 141 donor occupations, omitting 236 entries.

Cammermeyer's omissions violate federal law. The Federal Election Campaign Act ("FECA") specifies that reports filed by political committees disclose "the identification of each ... person (other than a political committee) who makes a contribution to the reporting committee ... whose contribution or contributions [aggregate over \$200 per calendar year]." 2 U.S.C. 434(b)(3)(A). For an individual, "identification" means his or her full name, mailing address, occupation and employer. 2 U.S.C. 431(13). Treasurers of political committees must be able to show they have exercised their best efforts to obtain, maintain and report this information. 2 U.S.C. 432(i).

Even where donors fail to provide this information about themselves, campaign committees must fill in missing information of which they are aware. 11 C.F.R. 104.7(b)(3). This basic public disclosure law forms the foundation for our campaign finance system. Voters in Washington's second district have the right to know where candidates' support comes from – indeed, clean elections are impossible when candidates conceal required information as Ms. Cammermeyer is doing.

The Commission has aggressively enforced this statutory requirement on many prior occasions. When the national Republican party failed to comply in 1994, the Commission litigated the issue all the way to the U. S. Supreme Court. *See RNC v. FEC*, 76 F.3d 400 (D.C. Cir. 1996), *cert. denied*, 117 S. Ct. 682 (1997). Even though the RNC reported the occupation and name of employer for 95% of its donors, the Commission demanded a \$20,000 penalty (conciliation agreement) for RNC's failure to comply with 2 U.S.C. 434(b)(3)(A).

Cammermeyer's inability to reach even 40% compliance is surely more serious and more significant to the Commission. The Commission should audit and investigate the Cammermeyer for Congress Committee and its failure to comply with the best efforts regulations.

Respectfully Submitted,


Paul M. Elvig

STATE of WASHINGTON

Sworn and subscribed to before
me this 3rd day of May, 1998


NOTARY PUBLIC

My commission

