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November 12, 2002

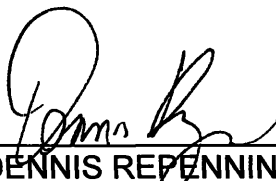
MUR # 5335

Federal Election Commission  
999 East Street NW  
Washington, DC 20463

**RE: Complaint**

Enclosed please find an original and a copy of a Complaint against the Geoff Davis campaign committee. Please be so kind as to note your receipt of the copy and return it to this office in the self-addressed, stamped envelope enclosed.

Very truly yours,

  
\_\_\_\_\_  
DENNIS REPENNING

DR/cmb

Encl. Complaint and copy  
Envelope

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL  
2002 NOV 19 A 11:31

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BEFORE THE FEDERAL ELECTIONS COMMISSION  
FILE NO. \_\_\_\_\_

IN THE MATTER OF

GEOFFREY C. DAVIS FOR CONGRESS COMMITTEE  
FEC COMMITTEE ID#C00369470  
JOE GREEN, TREASURER;

BILL SHEHAN, JR.  
107 Mount Zion Rd;  
FLORENCE, KY 41042

and

CHUCK DELADURANTEY  
4081 Five Lakes Road  
North Branch, MI 48461

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COMPLAINT

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COUNT 1.

1. On or about July 8, 2002, the Geoffrey C. Davis for Congress Committee accepted a total of \$3,000.00 (Three thousand dollars) from Billy Shehan, Jr., Georgia Shehan, and Susan Shehan.
2. The above contributions were reported in the October 15, 2002 finance report filed with the Commission.
3. Georgia Shehan, a daughter of Billy Shehan, Jr., is 5 or 6 years of age; Susan Shehan, also a daughter of Billy Shehan, Jr., is age 4.
4. According to the October 15, 2002 report, Georgia Shehan made a July 8, 2002, contribution in the amount of \$1,000.00 (One thousand dollars).
5. The October 15, 2002 report identifies Georgia Shehan as a "homemaker."

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6. In the Geoffrey Davis for Congress Campaign Committee's report of October 17, 2002, Georgia Shehan is identified as "unemployed."
7. According to the October 15, 2002 report, Susan Shehan made a July 8, 2002, contribution in the amount of \$1,000.00 (One thousand dollars).
8. Given the tender age of the children, the contributions reported in Paragraphs 4 and 5 above are attributable to Billy Shehan, Jr., who arranged the disbursements and controlled the funds in question.
9. Billy Shehan, Jr. therefore made an excessive contribution to the Geoffrey C. Davis for Congress Committee and therefore violated 2 USC §441(a)(1). See 11 CFR §§110.1(i)(2)(ii); 114.5(b)(1); 110.1(i)(2).
10. As a result of the allegations contained in Paragraphs 1 through 6 above, the Geoffrey C. Davis for Congress Committee violated 2 USC §434(a)(6)(A) by receiving an excessive campaign contribution.
11. The Geoffrey C. Davis for Congress Committee failed to take steps to investigate the contributions and refund them within the thirty-day time period required by the Commission. See 11 CFR §103.3(b)(1).

## COUNT II.

12. In the period beginning December 14, 2001 and ending December 17, 2001, the Geoffrey C. Davis for Congress Committee received a total of \$8,000.00 from various members of the immediate family of Chuck Deladurantey.
13. It is believed that due to the young age of some of the named contributors, said contributions are attributable to Chuck Deladurantey, who arranged that the contributions be made and controlled the funds in question.

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14. Chuck Deladurantey therefore made an excessive contribution to the Geoffrey C. Davis for Congress Committee and therefore violated 2 USC §441(a)(1). See 11 CFR §110.1(i)(2)(ii).
  15. As a result of the allegations contained in Paragraphs 12 through 14 above, the Geoffrey C. Davis for Congress Committee violated 2 USC §434(a)(6)(A) by receiving an excessive campaign contribution.
  16. The Geoffrey C. Davis for Congress Committee failed to take steps to investigate the contributions and refund them within the thirty-day time period required by the Commission. See 11 CFR §103.3(b)(1).

Respectfully submitted,

  
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STATE OF KENTUCKY  
COUNTY OF KENTON

Subscribed and sworn to before me this 12 day of November, 2002.

  
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NOTARY PUBLIC  
My Commission Expires: 8/26/03