

April 13, 2010

Thomasenia Duncan, Esquire
General Counsel
Federal Election Commission
999 E Street, NW
Washington, DC 20463

RECEIVED
COMMUNICATIONS
APR 20 2010
OFFICE OF GENERAL COUNSEL

MUR # 6278

Re: Complaint against Joyce B. Segers and the Committee to Elect Joyce Segers to Congress

Dear Ms. Duncan:

Pursuant to 2 USC § 437g(a)(1) and 11 CFR § 111.4, please accept this Letter of Complaint against Joyce B. Segers ("Segers") and the Committee to Elect Joyce Segers to Congress ("the Committee") for violations of the Federal Election Campaign Act of 1971, as amended (the "Act"), and Federal Election Commission ("FEC" or "Commission") regulations. Specifically, certain public communications made by Segers and the Committee failed to include the disclaimers required by 2 U.S.C. § 441d.

I. Facts

Joyce B. Segers is a candidate for the U.S. House of Representatives in the 2010 election cycle, running to represent Oregon's Second Congressional District. The Committee to Elect Joyce Segers to Congress, Segers' principal campaign committee, filed its FEC Form 1 Statement of Organization on February 18, 2010. Segers filed a FEC Form 2 Statement of Candidacy on February 18, 2010, and later filed an amended FEC Form 2 on March 9, 2010 in response to a Request for Additional Information from the FEC.

The Committee's website is located at www.joycesegers4congress.org and www.joycesegers.com. A screen shot of the website, captured on March 22, 2010 is enclosed as Attachment A (furthermore, each day since then including today the website lists no required disclaimer). Additionally, Segers handed out a flyer at the Democrat State Central Committee Meeting in Hood River, Oregon on March 6, 2010 ("the Flyer"). The flyer is enclosed as Attachment B. Neither the flyer nor the website has complied with the disclaimer requirements set forth in federal law.

II. Relevant Law

Any public communication made by a political committee and all internet websites of political committees available to the general public must display a disclaimer. 11 CFR 110.11(a)(1). A public communication is defined, in part, as any "general public political advertising." 11 CFR 100.26.

10044273925

If the communication is paid for and authorized by a candidate, an authorized committee of a candidate, or an agent of either, the disclaimer must clearly state that the communication has been paid for by the authorized political committee. 11 CFR 110.11(b)(1). All disclaimers must be "clear and conspicuous". 11 CFR 110.11(c)(1). In addition, disclaimers on printed materials must be of sufficient type size to be clearly readable, set aside in a box, and printed with a reasonable degree of color contrast between the background and the printed statement. 11 CFR 110.11(c)(2).

III. Legal Analysis

Segers and the Committee have willfully disregarded Federal law by failing to include disclaimers on both the Flyer, which clearly meets the definition of a public communication as set forth in FEC regulations, and the Committee's website. Federal law requires that both the Committee's website and all public communications, such as the Flyer, include disclaimers in order to indicate who authorized and paid for the communication. Failure to include a disclaimer on a public communication or website paid for by a Federal political committee is a violation of 2 U.S.C. § 441d and 11 C.F.R. § 110.11.

IV. Conclusion

Upon information and belief, and based upon the facts relayed herein, Segers and the Committee have violated the Federal Election Campaign Act of 1971, as amended, and Federal Election Commission Regulations as described herein. 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.

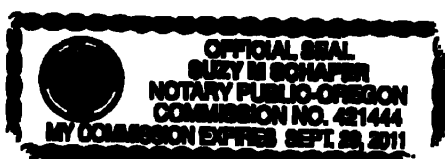
Respectfully submitted,




Keith R. Rockow

Redmond, OR

Sworn to and subscribed before me this 13th day of April, 2010.




Notary Public

My Commission Expires: Sept 29, 2011

Attachment A

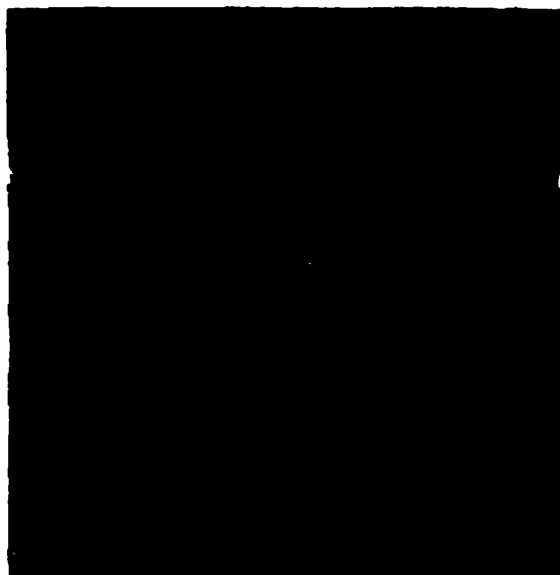
Ides for Oregon

- Home
- Upcoming Events
- Employment
- Education
- Joyce on the Road
- Related News
- Your Ideas

Home

Posted on February 28, 2010

Joyce Segers for Congress



Mission

To end the political stagnation that rules over Oregon Congressional District 2, and to relieve Oregon through job creation and strengthening the educational system

Stats: 5 Posts, 4 Comments

- To Search just type and

10044273928



Joyce Segers on Facebook

Home > Profile

Joyce Segers Check out what the health care legislation will mean for CD-3. Improving medicine for 140,000 against Vito is Walden against the bill

congresswoman.house.gov
congresswoman.house.gov

Post 17 at 9:00pm

Joyce Segers We are starting our tour of Eastern and Northwestern Oregon in a week. If you would like us to come visit please let us know we are currently visiting: Wenatchee, Libby, Umatilla, Grant and Clatsop counties. For more info

Joyce Segers has 70 Fans



Post 18 at 9:00pm



. Donate

3 Donations are applicable towards the 2010 Oregon Tax Credit

. Write us

- Your Ideas
- Your Oregon Story

. Read

- Joyce on the Road (1)
- Related News (3)
- Your Ideas (1)

. Related News

- Make open government norm in Oregon

7 Mar 2010

- Joyce reaches effort to challenge Walden

28 Feb 2010

↑ Top

© Joyce Segers | Powered by Your Ideas

Attachment B



Joyce Segers has decided to run for Congress, because as a wife, mother and small business owner, she has lived the problems Oregonians face on a daily basis.

Joyce believes that a strong education is the backbone of a strong economy. She says this will be accomplished when our teachers are paid and treated as professionals, our schools are funded so curriculums can meet the needs of each and every student, rural schools are connected to 21st century technology, and special needs students are treated as equals. If the government can find billions of dollars to bail out Wall Street, we can find a way to make our schools strong again and provide our students with a brighter future.

For nineteen years she ran a medical billing company where she helped thousands of people navigate their way through the bureaucratic maze of health insurance. She promised that one day she would become an advocate, not just for patients, but also for doctors. She knows without a doubt, we need to reform our current system.

**JOYCE
SEGRS**
For U.S. Congress

Joyce B. Segers Campaign for Congress
P.O. Box 3857 Ashland, OR 97820 (541) 401-1100
www.joycesegers4congress.org email: joyce@joyce4congress.org

10044273930