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OFFICE OF GENERAL COUNSEL

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Office of General Counsel
Federal Election Commission
999 E Street, N.W.
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SENSITIVE

MUR # 6330

To Whom It May Concern:

I wish to file a formal complaint against Bill Johnson, US Congress Republican candidate for Ohio's 6th Congressional District. Justification for this complaint are as follows:

In March 2009 I sat down for breakfast with the Mahoning County Republican chairman, Clarence Smith, and vice chairman, Mark Munroe, to seek the party's support to run for Congress in the 6th District against Charlie Wilson (D-Ohio). The upper half of this county lies in the 17th District, and the southern half in the 6th. To my right sat my wife, Paula, and to my left sat Bill Johnson. The response to my request was, "Absolutely," and from that point on I considered myself a "declared" candidate. Mr. Johnson then asked the chairman if he would give his support for Mr. Johnson to run in the 17th District against Tim Ryan (D-Ohio), and he, too, was advised that the party would back him for his race.

I began campaigning shortly thereafter, first traveling to Ironton, OH at the southernmost tip of the district, meeting with Lawrence and Scioto County Republican chairmen and executive committees. Meanwhile Mr. Johnson began campaigning in the 17th District, raising money in Mahoning, Portage, Trumbull, and Summit Counties to defeat Tim Ryan. I supported Mr. Johnson's efforts when people I met who live in the 17th asked about voting for me; I recommended they vote for Johnson because he lives in the 17th and would be taking on Ryan. Although he was campaigning under an "exploratory committee," he was actually laying the groundwork and soliciting donations for his campaign, not just "testing the waters."

Shortly after The Cook Report came out in January, Mr. Johnson decided to take the money he had raised in the 17th and jump down to the 6th for an easier race, against the advice of at least one of the district's county chairmen.

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When my receipts totaled \$5,000.00 I filed with your office as a qualified candidate. I believe Mr. Johnson failed to do so when he hit this benchmark, since it wasn't until Feb. 18, 2010 that he even filed a Statement of Organization. The following month he began stating in public that he had raised \$106,000.00 for his campaign, indicating to county chairmen that he was the "only qualified candidate in the race" because he had reached this level of contributions. According to his subsequent reports, the total was actually only \$96,000.00.

On another note, Mr. Johnson hired fundraiser Brenda Mack, who was already under contract as a fundraiser for another Republican candidate for the same office, Richard "Dick" Stobbs.

I believe Mr. Johnson has not followed FEC rules and regulations during this campaign, and has otherwise consistently exhibited deceptive practices. I request that you review the facts regarding declaration of candidacy and filing in a timely manner after accumulating \$5,000.00 in campaign funds.



Donald K. Allen, MS, DVM

Subscribed and sworn to, in my presence by Donald
K Allen this 3rd day of July, 2010.



Nancy L. Kimmel
Notary Public, State of Ohio
My commission expires 8/26/14

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