

# JANICE★HAHN

## FOR CONGRESS

June 16, 2011

Christopher Hughey, Esq.  
Acting General Counsel  
Federal Election Commission  
999 E Street N.W.  
Washington, D.C. 20463

MUR # 6477

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
2011 JUN 17 PM 1:32  
OFFICE OF GENERAL  
COUNSEL

Dear Mr. Hughey:

Pursuant to 2 U.S.C. § 437g, we urge the Federal Election Commission ("FEC" or "Commission") to undertake an immediate investigation and enforcement action against Craig Huey, Friends of Craig Huey for Congress and Turn Right USA for violations under the Federal Election Campaign Act of 1971, as amended, and Commission regulations.

### FACTS

Turn Right USA is a brand new "Super PAC" which filed papers as an Independent Political Action Committee on June 13, 2011, according to the FEC. These PACs are permitted to raise and spend unlimited amounts of money, provided that they have no communication or coordination with the campaign they aid and that they do not use such funds to make contributions to federal candidates. On June 14, 2011 Turn Right USA released an incendiary racist and sexist ad attacking Councilwoman Janice Hahn, candidate for the vacant 36<sup>th</sup> California Congressional seat.

Turn Right USA lists its official address at 18016 South Western Ave., Gardena, CA 90248. Previous FEC filings from as recently as May 2010 list an organization at that very address named CampaignLA. CampaignLA's website ([www.campaignLA.com](http://www.campaignLA.com)) describes the organization as "a one-stop, vertically integrated political campaign shop, which means we have all our resources in one place." Craig Huey's latest FEC disclosure report names CampaignLA as one of their vendors.

A standard DNS search (Domain Name Server) for the TurnRightUSA.org website identifies [doug@campaignla.com](mailto:doug@campaignla.com) as the website's registered agent for the "independent" committee. Additionally, the records list "campaignla.com" as one of two "RELATED DOMAINS FOR TURNRIGHTUSA.ORG." (See attached DNS Search records, conducted on <http://www.who.is/>.)

Moreover, Turn Right USA itself confirmed additional connections to the Huey campaign. According to its June 15, 2011 press release, G. Rick Marshall, Turn Right USA's designated agent registered with the FEC, recently volunteered for Craig Huey during the primary election but left over [the Huey campaign's] strategic direction."

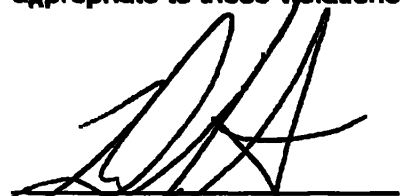
12044314821

## COMPLAINT

As such, Janice Hahn for Congress officially calls for a full investigation of the following possible violations of the Federal Election Campaign Act and Commission regulations by Craig Huey, Friends of Craig Huey for Congress and Turn Right USA:

1. Turn Right USA has paid for a coordinated communication under 11 C.F.R. § 109.21, thereby making a prohibited contribution to the Craig Huey campaign in violation of 2 U.S.C. § 441a.
2. Craig Huey and Friends of Craig Huey for Congress have received a prohibited contribution from Turn Right USA in violation of 2 U.S.C. § 441a and § 441i(e) via a coordinated communication.
3. Turn Right USA has violated the Commission's disclaimer regulations at 11 C.F.R. § 110.11 by falsely stating that the advertisement in question is "NOT authorized by any candidate or candidate's committee."

We strongly urge the FEC to conduct an immediate investigation into these allegations, declare that Craig Huey, Friends of Craig Huey for Congress and Turn Right USA have violated the Federal Election Campaign Act of 1971, as amended, and Commission regulations, impose sanctions appropriate to these violations and take such further action as may be appropriate.




Dave Jacobson  
Campaign Manager, Janice Hahn for Congress  
2513 Pacific Coast Hwy.  
Torrance, CA 90717

12044314822

VERIFICATION

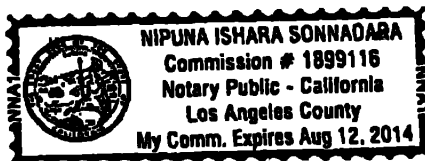
I hereby verify that the statements made in the attached complaint are, upon information and belief, true.

Sworn pursuant to 18 U.S.C. § 1001.

  
Dave Jacobson

Sworn to and subscribed before me on this 16<sup>th</sup> day of June, 2011.

N.T. Sonnadara.  
Notary Public



12044314823

**who.is**[Whois](#) [Site Info](#) [Name Suggest](#) [Premium Names](#) [Web Search](#) [DNS](#) [Who's Index](#) [IP Index](#) [FAQ](#) [Feedback](#)

DNS Records ▾

[WhoIs Search](#)**Turnrightusa.org DNS Lookup | Nameserver Lookup - Who.is**[Whois](#) [Archive](#) [Information](#) [Web Search](#) [DNS Records](#) [Suggestions](#) [Expiring](#) [Premium](#)  
Domains[Ads by Google](#)**Managed Colocation**  
Special Savings promotion- Hurry  
Offer end June 30th (888) 471-1816  
[go.SunGardAS.com](#)**TOOLS**[Ping](#)  
[Tracroute](#)  
[Name Server Search](#) **myhosting****SPEND  
LESS,  
DO  
MORE!****BUILD  
YOUR OWN  
VPS TODAY!****SIGN UP &  
SAVE NOW**[www.myhosting.com/whois-whois](#)**TURNRIGHTUSA.ORG NAME SERVERS**

Name Server	IP	Location
<a href="#">dns5.speedingbits.com</a>	66.29.143.203	Walla Walla, WA, US
<a href="#">dns6.speedingbits.com</a>		
<a href="#">ping.turnrightusa.org</a>		

**TURNRIGHTUSA.ORG SOA RECORD**

Name Server	<a href="#">dns5.speedingbits.com</a>
Email	<a href="#">doug@campaignla.com</a>
Serial Number	2011060901
Refresh	3 hours
Retry	1 hour
Expiry	7 days
MinTtl	3 hours

**TURNRIGHTUSA.ORG DNS RECORDS**

Record	Type	TTL	Priority	Content
<a href="#">mail.turnrightusa.org</a>	A	1 day		66.29.157.136 (Walla Walla, WA, US)
<a href="#">turnrightusa.org</a>	A	1 day		66.29.157.136 (Walla Walla, WA, US)
<a href="#">turnrightusa.org</a>	MX	1 day	30	<a href="#">turnrightusa.org</a>
<a href="#">turnrightusa.org</a>	NS	1 day		<a href="#">dns5.speedingbits.com</a>
<a href="#">turnrightusa.org</a>	NS	1 day		<a href="#">dns6.speedingbits.com</a>
<a href="#">turnrightusa.org</a>	SOA	1 day		<a href="#">dns5.speedingbits.com. doug.campaignla.com. 2011060901 10800 3600 604800 10800</a>
<a href="#">turnrightusa.org</a>	SOA	3 hours		<a href="#">dns5.speedingbits.com. doug.campaignla.com. 2011060901 10800 3600 604800 10800</a>
<a href="#">www.turnrightusa.org</a>	A	1 day		66.29.157.136 (Walla Walla, WA, US)

**RELATED DOMAINS FOR TURNRIGHTUSA.ORG**[speedingbits.com](#) [campaignla.com](#)DNS Records [Feedback](#) [Disclaimer](#) [Site Info](#) [Whois Names](#) [Domain Registration](#)  
©2006-2010 Who.is