

SENSITIVE

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FEDERAL ELECTION
COMMISSION

Federal Election Commission
999 E Street, NW
Washington, D.C. 20463

FEDERAL ELECTION
COMMISSION
SECRETARIAT

FILE #

6550

2012 APR -4 PM 5:28

2012 APR 10 A 9:32

OFFICE OF FEDERAL
COUNSEL

RE: Complaint against Sean Summers and Committee to Elect Sean Summers,
Respondents

To Whom It May Concern:

Pursuant to 2 U.S.C. § 437g(a)(1) and 11 C.F.R. § 111.4, I hereby file this complaint against Summers and Committee to Elect Sean Summers. Sean Summers is a candidate for the Republican nomination to the US House in Pennsylvania's Fourth Congressional District, and the Committee to Elect Sean Summers is his campaign committee. The undersigned are registered voters in York County, Pennsylvania.

This complaint is filed against Sean Summers and his campaign committee for violation of the Federal Election Campaign Act of 1971, as amended ("the Act" or "FECA") and the regulations of the Federal Election Commission ("the Commission" or "FEC"), specifically for publishing materials that have no disclaimer such that it is impossible to tell who paid for the materials as required by law.

The provisions of law violated by Sean Summers and his campaign committee are found at 11 C.F.R. §110.11(a) which require that every public communication paid for by the campaign must include a disclaimer which meets the following standards:

1. It must be clear and conspicuous giving the reader adequate notice of who paid for the communication;
2. For printed materials, it must contain a disclaimer of sufficient type size to be clearly readable. Type size is 12 point for printed items no more than 24" x 36".
3. The disclaimer must state "Paid for by Committee to Election Sean Summers" and be set apart inside a text box.

NONE of the requirements were followed for the attached flyer. See Exhibit A.

If the Summers campaign produced this flyer, then it is obligated under law to disclose that it printed and paid for the materials. If the Summers campaign did NOT produce this flyer, then why is the Summers campaign distributing the flyers?

The federal law requires the disclaimer and the Summers campaign has ignored the law. The FEC should investigate and fine the Summers campaign for its disregard and violation of federal law.

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Conclusion

Upon information and belief, and based upon the facts and the law, Sean Summers and the Committee to Elect Sean Summers have violated the Federal Election Campaign Act of 1971, as amended.

Please contact the undersigned if you have further questions.

Submitted,

John McDonald

Name *John McDonald*

Address

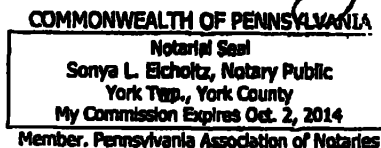
York PA 17406

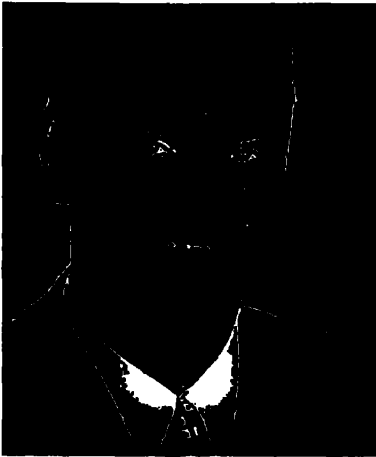
Before me this 3 day of April, 2012, appeared John McDonald and under penalty of perjury did swear and affirm that the above and foregoing facts are true and correct to the best of my knowledge and belief.

SEAL

My Commission Expires:

Sonya L. Elcholtz
Notary Public





Supporters

John Bailey, Bailey Travel
Bob Borden, VP, Shipley Energy
Les Brant
Mike Clifford, VP, McClarin Plastics
Andy Collins, Owner, Morgan
Collins Real Estate
Dr. Christine Daecher, Harrisburg
Bill and Kim Kerlin
Kathy King, Chair, York County
SPCA
Tighe King, Chairman/CEO,
Perform Group, LLC
Cher Kondor, Gold Star Mother,
Mother of SPC Martin W. Kondor
Dr. Tammy McBride, Spring Grove
Charlie Powers, President, First
Capital Insulation
Scott Rogers
Peter and Sharon Sheppard, RH
Sheppard
Bill Shipley, President, Shipley
Energy
Keith Smith, President, Keith
Smith Concrete
Albert Snyder, Father of LCPL
Matthew Snyder
Dr. Holly Thomas, Camp Hill
Larry Young, CGA law partner,
Manchester Township Supervisor

What People Are Saying

"I met Sean through his representation of Al Snyder in Mr. Snyder's case against the Wostboro Baptist Church. Sean made the entire military community proud by sticking up for an innocent military family and working pro bono (for free). Sean is exactly the type of person that we need in Congress. Please support him and most importantly, vote for Sean."
Larry Twitchell, Maj Gen, USAF (Ret)

"As a result of Sean's legal training and court room expertise he has a gift of Authority. He says what he means to say. He is decisive and willing to take risks. Sean also has the energy and spirit required to be composed, always professional and the ability to project a clarity of vision. I feel proud to endorse Sean in this election so he can fight the battles in Washington needed to insure that Businesses and specifically Manufacturers are represented and supported. Our support is critical in Sean's quest to win this election."

Todd Kennedy, Pres./CEO, McClarin Plastics, Inc.

"I've known Sean for years and we served together in peacetime and during time of war. He has the character and integrity that is needed in Washington. I'm confident that Sean understands the needs of our military and veterans and their sacrifices will not be forgotten if the voters send Sean to Congress. I urge all voters to support Sean."

R. Shane Lazenby, MAJ U.S. Army (ret.)

"Most people in the York County community are aware of Sean's professional skills and impressive accomplishments. In addition to his professional accomplishments, he has also served the York community for years by serving non-profit agencies as a volunteer. This work has demonstrated that he is committed to making our community a better place. My wife and I will vote for Sean and we are encouraging all of our friends and family to do the same."

Matthew Doran, President & CEO, Anstadt Communications

"I've known Sean personally and professionally for several years and when he told me that he was running for Congress, I told him that I supported him 100%. In addition to being very competent at his profession, he has the integrity that we need in Washington. I will vote for Sean and I'm encouraging all of my friends and family to vote for Sean."

Vaughn G. Silar, Jr., PE, President / Founder
Paragon Engineering Services

"Repeatedly, Sean has made our community proud to call him one of our own. He will make us all proud, once again, by serving as our United States Representative in Congress. Sean has my support and I ask that you vote for Sean on election day."

James R. Halley, PE

"I have known Sean for many years professionally through business association and more importantly as a friend. I can vouch for his character and his conduct. When Sean tells you that he will do something, you can be guaranteed that he will follow through. He has the character, reputation and experience to effectively represent the interests of Central Pennsylvania. We need a leader like Sean in Congress who will fight wasteful spending, and instill a fiscal discipline that will ensure a bright future for our children. I highly recommend that you vote for Sean Summers for Congress."

Benjamin A. McGlaughlin, President & CEO, Wolfgang Candy Company

"I got to know Sean through a professional relationship several years ago. I believe that he is exactly the kind of person we need in Washington. He has the character, the temperament and the backbone to get the job done, as he represents the people of South Central PA. I trust him, and consider him a friend. I was very happy when I saw the announcement that he had thrown his hat into the ring, because he is the kind of person that I can fully support."

Dennis Goodwin, Valcour, Inc.

"Sean Summers has served his country through his military service--both on active duty and on continuing reserve duty as an officer with the United States Army--and his community through his many hours of pro bono legal representation. He is one of the very few attorneys from York County to have argued before the Supreme Court of the United States, in the case of Snyder v. Westboro Baptist Church, standing up for the survivors of military personnel who have made the ultimate sacrifice. His dedication to the law and his determination to see justice served both indicate his unique qualifications for serving as our Representative to Congress. York County can only benefit from a Congressman of Sean's character, ethics, and service. I encourage you to support him in the upcoming election."

Terese "Terrie" Trebilcock

"Sean's hard work ethic combined with his leadership skills make him my choice for our next U.S. Congressman. The fact that he has never been a politician before is an added benefit, in my opinion. We need fresh faces in politics. Sean has my vote and I'm encouraging my friends and family to support Sean."

Rich Yingling, Vice President, First Capital Insulation, Inc.

"I have known Sean personally and professionally for a number of years and believe strongly that he embodies what we need in Congress to represent all of us. He has shown his patriotism both through his service in the military and in his representation of Al Snyder all the way to the Supreme Court of the United States. The fact that he has never held an elected position in my mind is a positive....he is not a politician, but wants to be a government servant to the people who elect him. We need this now, more than ever in Washington. I strongly encourage you to vote for Sean and send him to Washington to stand up for all of us."

Terry L. Lehman, CPA, Partner, ParenteBeard LLC

