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February 8, 2017

Ben LaGarde

Glenmoore, PA 1934
Complainant,

v.

Costello Constituent Action Group
PO Box 172
Hereford, PA 18056

Unknown Individuals and Organizations

Respondents.

MUR # 7216

OFFICE OF GENERAL
COUNSEL

FEB 10 PM 12:08

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FEDERAL ELECTION
COMMISSION

COMPLAINT

This Complaint is filed pursuant to 52 U.S.C. § 30109(a)(1). This Complaint is based on information and belief that the Costello Constituent Action Group (the "CCAG") is violating the Federal Election Campaign Act of 1971, as amended (the "Act") and corresponding regulations promulgated by the United States Federal Election Commission (the "Commission"), as more fully set forth below.

On information and belief based on the CCAG's own public communications, the CCAG is a political organization that commenced organized political activities after the 2016 President Election. The CCAG promotes itself on social media and the Internet as a political organization with its mission to resist the dismantling of environmental and societal protections. The CCAG specifically targets United States Congressman Ryan Costello and the policies of President Donald J. Trump. The CCAG goes as far as to include Congressman Costello's last name in the organization's name.

Congressman Costello was elected in 2014 and re-elected in 2016 to represent the Sixth Congressional District of Pennsylvania. Congressman Costello filed FEC Form 1 (Statement of Candidacy) on December 1, 2016 seeking re-election in 2018. As such, Congressman Costello is a candidate for federal office for purposes of the Act. The CCAG is not an authorized committee of Congressman Costello for purposes of the Act.

On information and belief, the CCAG primarily conducts its political activity through a website, a Facebook page, a Twitter page and an email distribution list. The CCAG also sponsors and promotes organized protests against Congressman Costello and President Trump at locations throughout Congressman Costello's congressional district, including at his district offices and

community outreach locations. On information and belief, the CCAG is also conducting an active media outreach campaign to garner coverage of its organized protests by local television and print media.

On information and belief, the CCAG acts behind the veil of Internet privacy, not disclosing on its website or social media pages the names of the individuals who operate the organization or a physical address where the organization is located. The only address that the CCAG provides to the public is a post office box contained at the bottom of its mass email communications. In addition, the CCAG anonymously registered its Internet domain name thereby blocking the identity of the individual and/or organization that purchased the domain name.

Based on information and belief, the CCAG is violating the Act. The violations may include, but not are limited to:

1. The CCAG is a nonconnected political committee that has failed to register with the Commission.
2. The CCAG has failed to appoint a Treasurer and is in violation of federal law by accepting contributions, including in-kind contributions, and/or making expenditures without a duly appointed Treasurer.
3. The CCAG has failed to include federally mandated disclaimers on its website, Facebook page, email messages and other public communications and solicitations.
4. By using Congressman Costello's last name, the CCAG is in violation of federal law prohibiting the use of a federal candidate's name in the organization's name.
5. Any and all additional violations of the Act committed by the CCAG, its agents and/or affiliated organizations.

Information in support of this Complaint can be found at the following:

CCAG Website: www.ccag-d6.com

Facebook: www.facebook.com/Costello-Constituent-Action-Group-1434051296618846/

Twitter: https://twitter.com/CCAG_District6

I respectfully request an investigation into whether the CCAG and any other related individuals and/o affiliated organizations have violated federal campaign finance laws.

I hereby affirm and state under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge and belief.

B. LaGarde
Ben LaGarde

Subscribed and sworn to me on this 8 day of February 2017, by Ben LaGarde

Notary Public

