

Robin Rieck

Cedar Creek, Texas 78612

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April 24, 2018

MUR # 7375

Federal Election Commission  
1050 First N.E.  
Washington, D.C. 20463  
Attn: Office of General Counsel

2018 APR 30 PM 2: 51

OFFICE OF  
GENERAL COUNSEL

**COMPLAINT: BARRERA, RAUL (ROY) (H6TX27092)**

To the Office of General Counsel:

I am a constituent of Texas U.S. Congressional District 27 and a resident at the above address. I hold a strong interest in making sure candidates and elected officials comply with the law, including regulations like the Federal Election Campaign Act (52 U.S.C. § 30104(a)) that ensure financial transparency in federal election campaigns, as well as a fully informed electorate.

On April 22, 2016, the referenced candidate, Raul (Roy) Barrera, filed his Statement of Candidacy as a Congressional candidate (Image No. 201604250300071517) (although it is dated December 15, 2015) for the 2016 election cycle. He identified "Barrera for Congress" as his Principle Campaign Committee. At the same time, "Barrera for Congress" filed a Statement of Organization and identified David Boatwright as Treasurer.

Mr. Barrera is now a candidate in the current 2018 election cycle. Mr. Barrera faces a run-off election on May 22, 2018 to determine the Democratic candidate in the general election on November 6, 2018. This Complaint reports Mr. Barrera's multiple violations of FEC filing requirements in both the 2016 and 2018 election cycles.

**2016 Violations**

From a search of the FEC's online database, "Barrera for Congress" does not appear to have filed the following required financial disclosures of campaign contributions and expenditures, despite receiving noncompliance notices:

- On December 28, 2016, the FEC notified Mr. Boatwright and “Barrera for Congress” that the Barrera campaign failed to file a “POST-GENERAL REPORT” for the reporting period 10/20/2016 - 11/28/2016 (Image No. 201612290300073656).
- On February 16, 2017, the FEC notified Mr. Boatwright and “Barrera for Congress” that the Barrera campaign failed to file a “YEAR-END REPORT” for the reporting period 11/29/2016 - 12/31/2016 (Image No. 201702160300078187).
- On May 1, 2017, the FEC notified Mr. Boatwright and “Barrera for Congress” that the Barrera campaign failed to file an “APRIL QUARTERLY REPORT” for the reporting period 01/01/2017 - 03/31/2017 (Image No. 201705010300085692).
- On August 2, 2017, the FEC notified Mr. Boatwright and “Barrera for Congress” that the Barrera campaign failed to file a “JULY QUARTERLY REPORT” for the reporting period 04/01/2017 - 06/30/2017 (Image No. 201708020300088917).
- On November 2, 2017, the FEC notified Mr. Boatwright and “Barrera for Congress” that the Barrera campaign failed to file an “OCTOBER QUARTERLY REPORT” for the reporting period 07/01/2017 - 09/30/2017 (Image No. 201711020300094358).
- On February 16, 2018, the FEC notified Mr. Boatwright and “Barrera for Congress” that the Barrera campaign failed to file a “YEAR-END REPORT” for the reporting period 10/01/2017 - 12/31/2017 (Image No. 201802160300098475).

### **2018 Violations**

In its 2016 Statement of Organization, “Barrera for Congress” identified the campaign website <https://www.electraulroybarrera.com>. Mr. Barrera appears to be using the same website for his 2018 congressional campaign. The website

again identifies Mr. Boatwright as Treasurer and indicates two committees that "paid for" the content, "Raul Barrera Campaign Committee" and "Elect Barrera 2017 Committee." The website no longer identifies "Barrera for Congress."

Despite an active 2018 congressional campaign, from a search of the FEC's online database, it appears that neither Mr. Barrera nor any committee associated with his campaign has filed any documents or reports since 2016:

- It does not appear that Mr. Barrera filed an Amended Statement of Candidacy disclosing his change in campaign committees within ten days of the change, as required.
- Neither the "Raul Barrera Campaign Committee" nor the "Elect Barrera 2017 Committee" appears to have filed a Statement of Organization.
- Neither the "Raul Barrera Campaign Committee," the "Elect Barrera 2017 Committee," nor "Barrera for Congress" appears to have filed any financial disclosure reports since 2016.

Mr. Barrera is running an active campaign throughout the TX27 district. As demonstrated by postings on his Facebook page ("Raul Roy Barrera"). Mr. Barrera uses campaign signs, t-shirts, and extensive social media memes and other graphics. He has made campaign appearances throughout the district. It seems improbable that he has not reached \$5,000 in receipts and disbursements, the amount that triggers reporting requirements, since he had reached that threshold during the first quarter of 2016.<sup>1</sup>

I make this Complaint in the interest of the voters of U.S. congressional district TX27. Each voter deserves to be fully informed before casting their ballots in the run-off on May 22, 2018 to select the best Democratic candidate for the general election in November.

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<sup>1</sup> Also from a search of the FEC's online database, "Barrera for Congress" filed for the April 2016 quarter a report reflecting more than the \$5,000 in both receipts (\$8,605.17) and disbursements (\$6,940.61).

**AFFIDAVIT UNDER PENALTY OF PERJURY**

STATE OF TEXAS           §  
  §  
COUNTY OF BASTROP   §

I declare under penalty of perjury that I have read the above Complaint, and the statements of fact stated therein are within my personal knowledge unless otherwise stated and are true and correct.

Signed on this the 24th day of April, 2018.

*Rob Rieck*

ROBIN RIECK

STATE OF TEXAS           §  
  §  
COUNTY OF <sup>Travis</sup> BASTROP   §

SUBSCRIBED AND SWORN TO on the 24th day of April, 2018 BEFORE ME, the undersigned Notary Public, by ROBIN RIECK, ~~who is personally know to me and~~ who produced a Texas Driver's license as identification.

*Kenneth L. Ramus*

Notary Public, State of Texas  
Printed Name Kenneth L. Ramus  
Comm. Expires 7/21/18  
Commission No. 12989184-3