

OFFICE OF
GENERAL COUNSEL
2018 MAY -7 AM 11:29

BEFORE THE FEDERAL ELECTION COMMISSION

HAGAN FOR CONGRESS
12351 Prospect Rd.
Suite C
Strongsville, OH 44149
(440) 459-0903

MUR # 7378

v.

ANTHONY GONZALEZ FOR CONGRESS
P.O. Box 45113
Westlake, OH 44145

CONSERVATIVE LEADERSHIP NOW PAC
824 S. Midledge Ave.
Suite 101
Athens, GA 30605
(706) 354-7780

COMPLAINT

This complaint alleges that Anthony Gonzalez for Congress and Conservative Leadership NOW PAC are colluding by coordinating messaging.

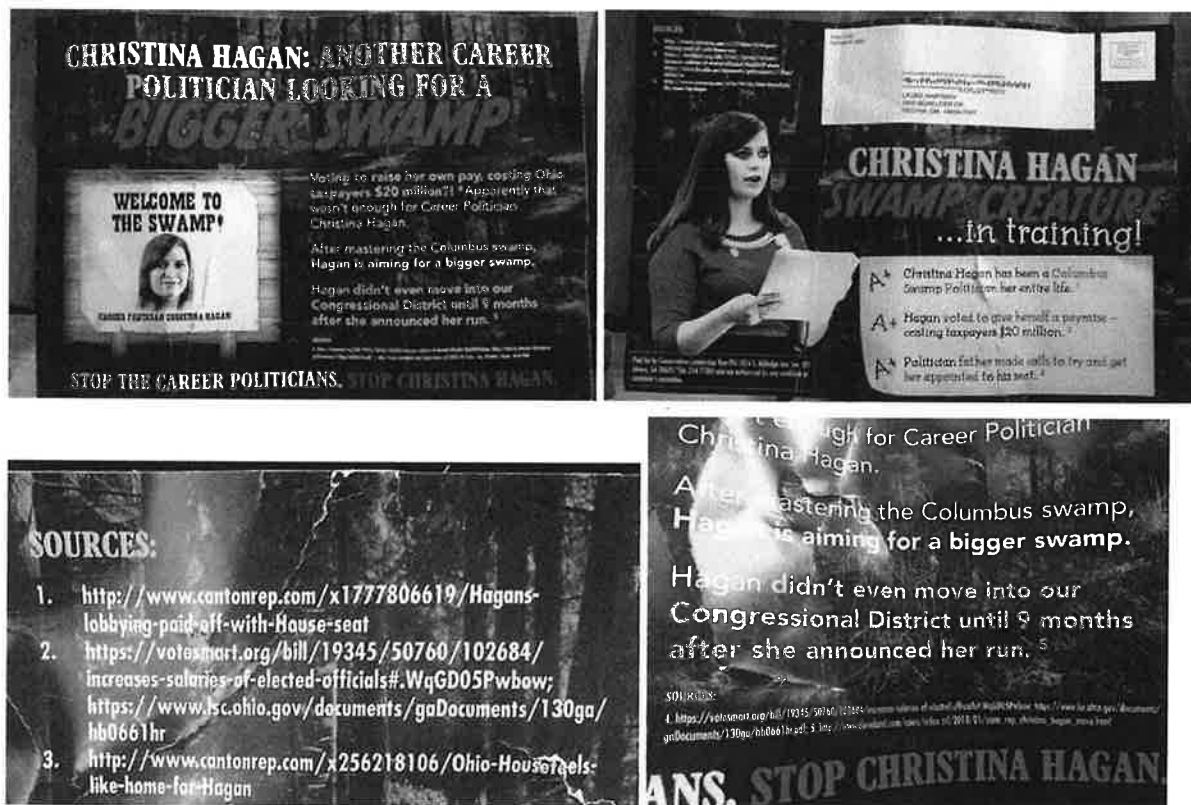
Conservative Leadership NOW PAC issued the following mailer and within two days, Anthony Gonzalez for Congress followed up with similar messaging and sources.

Conservative Leadership Now PAC

This mailer was sent out two days before the one issued by Anthony Gonzalez for Congress. Notice the similarity in bullet points, content and sources.

“CHRISTINA HAGAN, SWAMP CREATURE...in training!”

- “Christina Hagan has been a Columbus Swamp Politician her entire life.
- Hagan voted to give herself a payraise—costing taxpayers \$20 million.
- Politician father made calls to try and get her appointed to his seat.”



Sources

1. <http://www.cantonrep.com/x1777806619/Hagans-lobbying-paid-off-with-House-seat>
2. <https://votesmart.org/bill/19345/50760/102684/increases-salaries-of-elected-officials#.WqGD05Pwbow>; <https://www.lsc.ohio.gov/documents/gaDocuments/130ga/hb0661hr>
3. <http://www.cantonrep.com/x256218106/Ohio-House-feels-like-home-for-Hagan>
4. <https://votesmart.org/bill/19345/50760/102684/increases-salaries-of-elected-officials#.WqGD05Pwbow>; <https://www.lsc.ohio.gov/documents/gaDocuments/130ga/hb0661hr.pdf>
5. http://www.cleveland.com/open/index.ssf/2018/01/state_rep_christina_hagan_move.html

2 days later: Anthony Gonzalez for Congress

See the similar messaging and order of talking points:

- "Appointed to her seat
- Votes for higher taxes
- Votes to raise her own pay"

The mailer ends with "HOW CAN WE TRUST CHRISTINA HAGAN TO DRAIN THE SWAMP...When She Has Spent Her Entire Career There?"



Sources

- 1) <http://www.cantonrep.com/x256218106/Ohio-Housefeels-like-home-for-Hagan>
- 2) HB 59, Ohio General Assembly, Passed 61-35, 4/18/13; Hagan Voted Yes; HB 64, Ohio General Assembly, Passed 62-33, 6/25/15; Hagan Voted Yes; HB 29, Ohio General Assembly, Passed 81-16, 3/29/17, Hagan Voted Yes
- 3) 11661, Ohio District Assembly, Passed 56-26, 12/4/14; Hagan Voted Yes

SUMMARY OF THE LAW

As 11 CFR 109.20 and 109.21 clearly state, there shall be no coordination of content or communication (which serve as an in-kind contribution and expenditure). Collusion of this kind between a campaign and super PAC is illegal.

CAUSES OF ACTION

We are calling on the FEC to investigate these claims. Our election process should be protected at all costs and any attempt to undermine our democracy or the rule of law shall be prosecuted to the fullest extent of the law.

April 28, 2018

Respectfully submitted,



Brian Wollet

Campaign Manager

Hagan for Congress

12351 Prospect Rd.

Suite C

Strongsville, OH 44149

(440) 459-0903

VERIFICATION

The complainant listed below hereby verifies that the statements made in the attached complaint are, upon their information and belief, true.

Sworn pursuant to 18 U.S.C. § 1001

For Complainant



Brian Wollet

Campaign Manager

Hagan for Congress

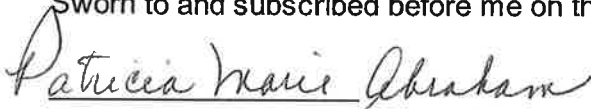
12351 Prospect Rd.

Suite C

Strongsville, OH 44149

(440) 459-0903

Sworn to and subscribed before me on this 28th day of April 2018.



Notary Public



PATRICIA MARIE ABRAHAM
Notary Public, State of Ohio
Recorded in Cuyahoga County
My Comm. Expires May 11, 2020