

100-44664-11  
OFFICE OF  
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MUR # 7509

October 3, 2018

Federal Election Commission  
Office of General Counsel  
1050 First Street, NE  
Washington, DC 20002  
Attn: Office of Complaints Examination

Re: Complaint Against Tim Ryan for Congress filed pursuant to 52 U.S.C. § 30120(c)(2)

To the Federal Election Commission,

This complaint is filed pursuant to 52 U.S.C. § 30120(c)(2) and is based on information and belief that Tim Ryan For Congress has violated the Federal Election Campaign Act ("FECA" or "the Act"), as amended, 52 U.S.C. § 30101 *et seq.* As detailed below, we bring to the Commission's attention instances of illegal and/or unauthorized general public political advertising by Tim Ryan and Tim Ryan for Congress.

Tim Ryan is the U.S. Representative for Ohio's 13th congressional district, and is running for re-election in 2018. Tim Ryan's principal campaign committee is Tim Ryan for Congress (C00373464).

**1. Background**

Since at least October 1, 2018, Tim Ryan For Congress has authorized, paid for and distributed a printed general public campaign advertisement, attached hereto as Exhibit A (the "Advertisement"). The Advertisement includes a photo of Tim Ryan and Tim Ryan's campaign logo on the front and general political references on the back. On the front of the Advertisement an identification of funding and authorizing sources, "Paid for By Tim Ryan for Congress" (the "Disclosure"), appears. The Disclosure is not "in a printed box set apart from the other contents of the communication on the advertisement".

**2. Application of Law**

Releasing a printed general public political advertisement that does not have the identification of funding and authorizing sources in a printed box set apart from the other contents of the communication on the Advertisement is a violation of the FECA and Federal Election Commission ("FEC" or "the Commission") regulations.

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The FECA mandates “[w]henever a political committee makes a disbursement for the purpose of financing any communication through any...type of general public political advertising...such communication (1) if paid for and authorized by a candidate, an authorized political committee of a candidate, or its agents, shall clearly state that the communication has been paid for by such authorized political committee” and such disclosure shall be “be contained in a printed box set apart from the other contents of the communication.” See 52 U.S.C. §30120(a)(1) and §30120(c)(2).

### 3. Conclusion

Authorizing, paying for and distributing a printed general public campaign advertisement that does not have the identification of the funding and authorizing sources of such advertisement in a printed box set apart from the other contents of the communication on the advertisement is clearly prohibited by 52 U.S.C. § 30120(c)(2). Accordingly, the Advertisement and its Disclosure are being distributed in violation of the FECA and Commission regulations

We request that the Commission find reason to believe that Tim Ryan and Tim Ryan For Congress have violated FECA and conduct an immediate investigation pursuant to 52 U.S.C. § 30120(c)(2), and thereafter impose appropriate penalties and sanctions for all violations.

Sincerely,



Mark E. Munroe

Exhibit A



**VERIFICATION**

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

Sworn pursuant to 18 U.S.C. § 1001.

  
\_\_\_\_\_  
Mark E. Munroe

Sworn to and subscribed before me this 4<sup>th</sup> day of October 2018.

  
\_\_\_\_\_  
Notary



Mark G. Mangie  
Attorney At Law  
Notary Public, State of Ohio  
My comm. has no expiration date  
Sec. 147.03 R.C.