



Israel G. Torres
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October 6, 2018

Office of General Counsel
Federal Election Commission
1050 First Street, NE
Washington, DC 20463

MUR # 7513

2019 OCT 15 PM 1:38
OFFICE OF
GENERAL COUNSEL

Re: Third-party Complaint Against Unregistered Entity: Community Issues Project

By this letter, the Torres Law Group requests that the Federal Elections Commission (the “Commission”) investigate an entity known as the Community Issues Project. This entity has made at least three separate expenditures against Greg Stanton’s campaign for U.S. House conducted under the Stanton for Congress Committee (Comm. No. C00657304).

Facts

The entity is not registered with the Commission, the Arizona Secretary of State nor the Arizona Corporation Commission. However, based on the expenditures made, we believe the entity’s telephone number is (765) 560-3781. This is a Google Voice number. The mail sent by the entity provides P.O. Box 13182, Scottsdale, AZ 85267 as a mailing address.

Enclosed with this complaint is a flash drive with the following:

- An image of the mailer sent some time shortly before October 4, 2018.
- A video from Instagram posted shortly before October 4, 2018.
- A recording of a pre-recorded, automatic dialer message received on October 2, 2018.

Violations

Failure to Register. Although we have no way to know the precise amount that Community Issues Project has spent to expressly advocate for the defeat of a Greg Stanton, a clearly identified candidate for federal office, it is likely more than the \$1000.00 required for the entity to register as a federal committee with the Commission.

Failure to Report. All of these expenditures were made within the calendar year of the upcoming General Election but before the 20th day before the election. They are

represented as independent expenditures. If the aggregate expenditure exceeded \$10,000.00, which seems likely given the three separate professionally produced media pieces, the entity failed to make the required 48-hour reports.

Improper Disclaimer. Only the robocall has the correct disclaimer. The mail piece fails to provide the payer's permanent street address, telephone number or website address within the disclaimer. The Instagram video lacks the phrase, "not authorized by any candidate or candidate's campaign committee," and fails to provide the payer's permanent street address, telephone number or website address within the disclaimer.

Please feel free to contact me if you have any questions or if we can provide any further information.

Yours,

James E. Barton II
James E. Barton II

Encl.

CC (without encl.): Community Issues Project, P.O. Box 13182, Scottsdale, AZ 85267

VERIFICATION

I, James E. Barton II, Complainant in this matter, have read the above complaint and swear the facts contained therein it to be true to the best of my knowledge, except as to those matters stated therein upon information and belief, and as to such matters, I believe them to be true. I make this declaration under penalty of perjury.

James E. Barton II
James E. Barton II

SUBSCRIBED AND SWORN to before me on this 6th day of October, 2018.

Shyla Ware
Notary Public

My commission expires: *4-4-2021*

