

THE JACOBSON LAW GROUP
JACOBSON · MAGNUSON · ANDERSON
& HALLORAN P.C.

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OFFICE OF
 GENERAL COUNSEL

2018 NOV -1 PM 11: 00

October 25, 2018

MUR # 7532

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

Re: Sua Sponte Submission of Complaint Regarding Disclaimer Violations

Complainant: Friends of Erik Paulsen (FEC No. C00439661)
P.O. Box 44369
250 Prairie Center Drive
Eden Prairie, MN 55344

Respondent: Care in Action

To Whom It May Concern:

The Friends of Erik Paulsen Committee submits Complaint against the Care in Action Committee for violating federal election law.

Failure to Provide Disclaimer

On or about October 17, 2018, Representative Erik Paulsen received at his private residence a political communication in the form of campaign literature from an unidentified political committee. The public communication advocated for the defeat of Representative Erik Paulsen, incumbent for election to the 3rd Congressional District of Minnesota. See attached Exhibit A – October 17, 2018 Communication. The public communication failed to contain a campaign communication disclaimer as required by 11 CFR § 110.11.

Upon information and belief, the public communication was paid for and prepared by Care in Action. The content of the mailer matched in substance and style to content presented in two digital political advertisements published on Facebook.com by a group called “Reunify Families Now.” See attached Exhibit B – Screenshot of October 12th Digital Advertisement; Exhibit C – Screenshot of Reunify Families Now Ad Archive; Exhibit D – Ad Performance for October 12th Digital Advertisement; Exhibit E – Ad Performance for October 7th Digital Advertisement. The digital advertisements state in their header “Paid for by Care in Action” and link to www.paulsenfailedfamilies.com. The digital advertisements ran from October 7, 2018 and October 12, 2018 to October 23, 2018, respectively, and are currently listed as inactive. Both digital advertisements failed to state contact information for Care in Action and failed to

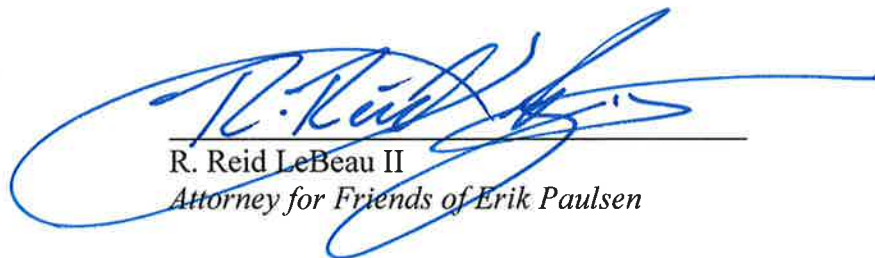
state whether or not the political advertisement was authorized by any candidate, as required by 11 CFR § 110.11(b)(3).

Content presented on www.paulsenfailedfamilies.com is similar to, and in instances identical to, the public communications presented on the mailer and digital advertisement. See attached Exhibit F – Screenshot of Website. The website contains the following disclaimer:

PAID FOR BY CARE IN ACTION. INDEPENDENT EXPENDITURE, NOT APPROVED BY ANY CANDIDATE OR CANDIDATE’S COMMITTEE.

The communication received on October 17, 2018 violates 11 CFR § 110.11 because it does not contain a disclaimer. Furthermore, the digital advertisements violates 11 CFR § 110.11(b)(3) because (1) the disclaimer fails to state the “permanent street address, telephone number, or World Wide Web address of the persona who paid for the communication” and (2) the disclaimer does not state “that the communication is not authorized by any candidate or candidate’s committee.”

Respectfully submitted,


R. Reid LeBeau II
Attorney for Friends of Erik Paulsen

Subscribed and sworn to before
me this 25th day of
October, 2018.


Notary Public

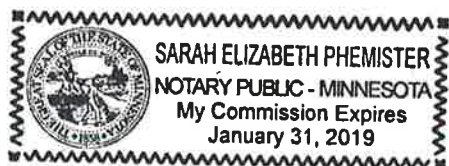


Exhibit A

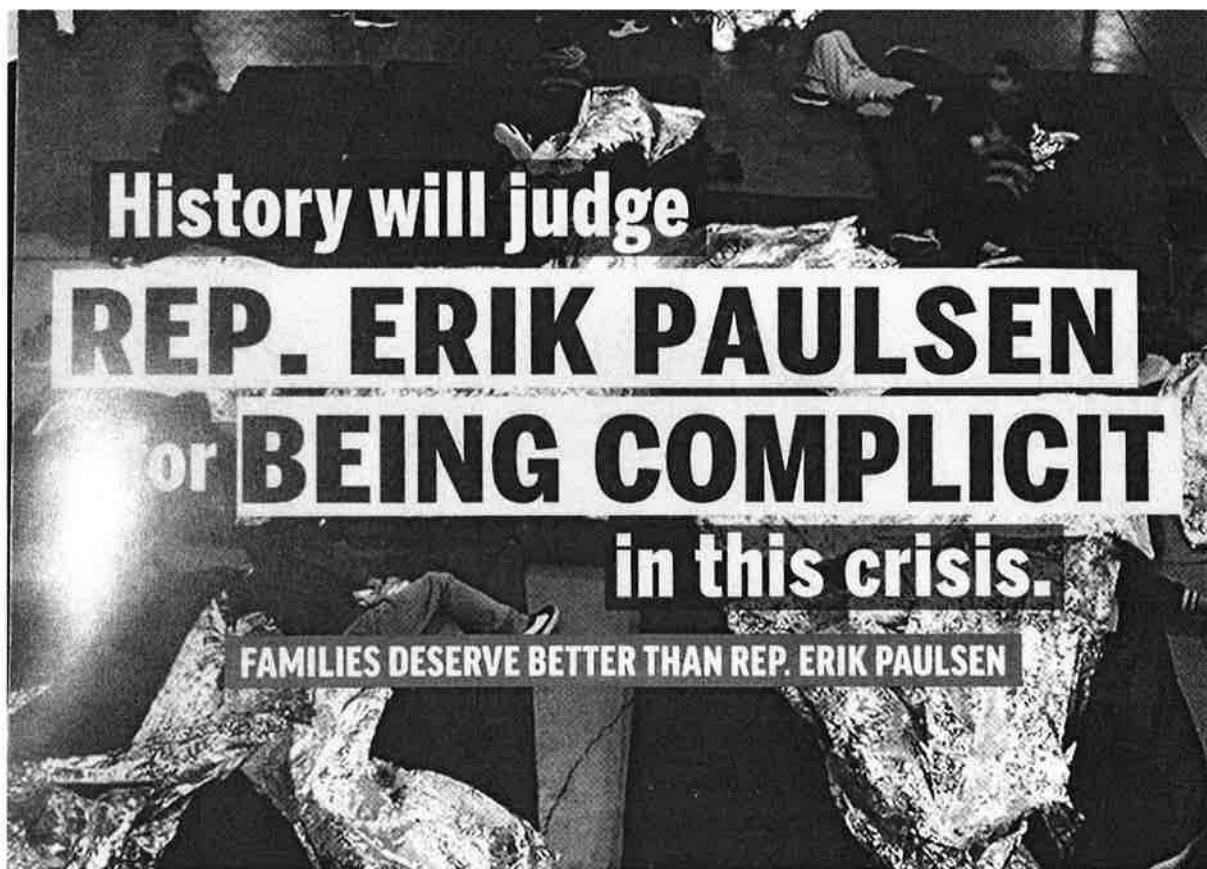


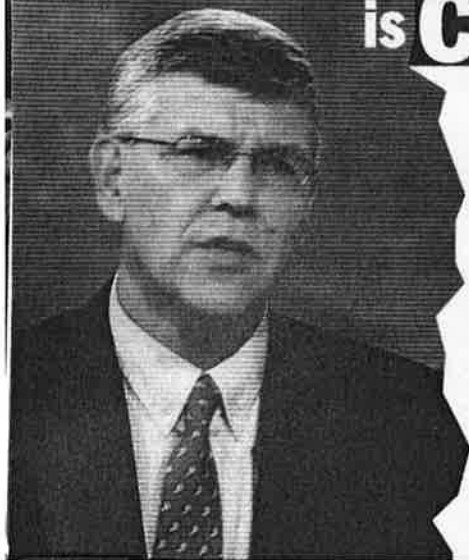
Photo of October 17, 2018 Communication, Front

© PLEASE RECYCLE AFTER READING / RECYCLES MATÉRIEL

PERMIT NO. 2093
PAID
85040
US POSTAGE

1144 *****8075 DIGIT 85044 PS8C
ERIK PAULSEN
EDEN PRATINE NY 05347-2018

REP. ERIK PAULSEN is **COMPLICIT** in the separation of families.



UN-AMERICAN

Throughout history, America has fought to protect families in jeopardy. But now our government is locking up thousands of children in military detention centers along our own border.¹

UNJUST

As an elected member of Congress, Paulsen has the power to act against this crisis. But he has refused to introduce or support legislation to keep families safe and together.

UNWORTHY

Paulsen voted to let the Trump administration lock up children and families indefinitely, and make it harder for these children to ever see their families again. Paulsen is making this crisis worse.²

FAMILIES DESERVE BETTER THAN REP. ERIK PAULSEN

CHECK THE FACTS:

1) U.S. Dept. of Health and Human Services, 7/13/18;
2) Vote on HR 6136, 6/27/18

Photo of October 17, 2018 Communication, Back

Exhibit B



Reunify Families Now
Sponsored · Paid for by Care in Action · 

Throughout history, Americans have stood up against human rights abuses and crimes against children. By letting his party take children and babies from their parents and lock them in prisons, Erik Paulsen has betrayed American values.

WHAT DID ERIK PAULSEN DO?

Families deserve better than Rep. Erik Paulsen. [Learn More](#)

   11

5 Comments 3 Shares 3K Views

Screenshot of October 12th Digital Advertisement

Exhibit C

Ad Library Return to Facebook

Q Reunify Families Now X

Filter results by 4 results
 Showing ads from the Page Reunify Families Now. [Learn more](#)

Country

- All
- Brazil
- United Kingdom
- U.S.

Ad Status

- All
- Active Ads Ⓢ
- Inactive Ads Ⓢ


Ads launched in October 2018

Inactive
Oct 12, 2018 - Oct 23, 2018

Paid for by Care in Action

Reunify Families Now
Sponsored - Paid for by Care in Action

Throughout history, Americans have stood up against human rights abuses and crimes against children. By letting his party take children and babies from their parents and lock them in prisons, Erik Paulsen has betrayed American values.



Families deserve better than Rep. Erik Paulsen. [Learn More](#)

[www.reunifyfamilies.com](#)


See Ad Performance

Inactive
Oct 12, 2018 - Oct 23, 2018

Paid for by Care in Action

Reunify Families Now
Sponsored - Paid for by Care in Action

Throughout history, Americans have stood up against human rights abuses and crimes against children. By letting her party take children and babies from their parents and lock them in prisons, Ann Wagner has betrayed American values.



Families deserve better than Rep. Ann Wagner. [Learn More](#)

[www.reunifyfamilies.com](#)


See Ad Performance

Inactive
Oct 7, 2018 - Oct 23, 2018

Paid for by Care in Action

Reunify Families Now
Sponsored - Paid for by Care in Action

If Rep. Ann Wagner won't fight to protect children from being ripped away from their parents, she doesn't deserve to speak for Missouri families.



Families deserve better than Rep. Ann Wagner. [Learn More](#)

[www.reunifyfamilies.com](#)

See Ad Performance

Inactive
Oct 7, 2018 - Oct 23, 2018

Paid for by Care in Action

Reunify Families Now
Sponsored - Paid for by Care in Action

If Rep. Erik Paulsen won't fight to protect children from being ripped away from their parents, he doesn't deserve to speak for Minnesota families.

Screenshot of Reunify Families Now Ad Archive

Reunify Families Now

Filter results by

Country

- All
- Brazil
- United Kingdom
- U.S.

Ad Status

- All
- Active Ads
- Inactive Ads



Families deserve better than Rep. Erik Paulsen
[Learn More](#)



Families deserve better than Rep. Ann Wagner
[Learn More](#)



Families deserve better than Rep. Ann Wagner
[Learn More](#)

See Ad Performance

See Ad Performance

See Ad Performance

Inactive Oct 7, 2016 - Oct 23, 2018

Paid for by Care in Action

Reunify Families Now
 Sponsored - Paid for by Care in Action

If Rep. Erik Paulsen won't fight to protect children from being ripped away from their parents, he doesn't deserve to speak for Minnesota families.



Families deserve better than Rep. Erik Paulsen
[Learn More](#)

See Ad Performance

Screenshot of Reunify Families Now Ad Archive, cont.


Exhibit D

Ad Performance



Reunify Families Now
Sponsored - Paid for by Care in Action

Throughout history, Americans have stood up against human rights abuses and crimes against children. By letting his party take children and babies from their parents and lock them in prisons, Erik Paulsen has betrayed American values.



Families deserve better than Rep. Erik Paulsen.
WWW.PAULSENFAILEDFAMILIES.COM

[Learn More](#)

Reunify Families Now
View more ads from this Page

Paid for by Care in Action

When an advertiser categorizes their ad as being related to politics or issues of national importance, they are required to disclose who paid for the ad. [Learn more](#)

[See additional disclaimer information](#)

Ad Performance

● Inactive
Oct 12, 2018 - Oct 23, 2018

10K - 50K
Impressions

\$500 - \$999
Money spent (USD)

Audience Breakdown

Age and Gender

Age Group	Men	Women	Unknown
18-24	2%	2%	0%
25-34	8%	11%	0%
35-44	8%	14%	0%
45-54	6%	15%	0%
55-64	5%	14%	0%
65+	2%	5%	0%

Screenshot of October 12th Ad Performance

Ad Performance

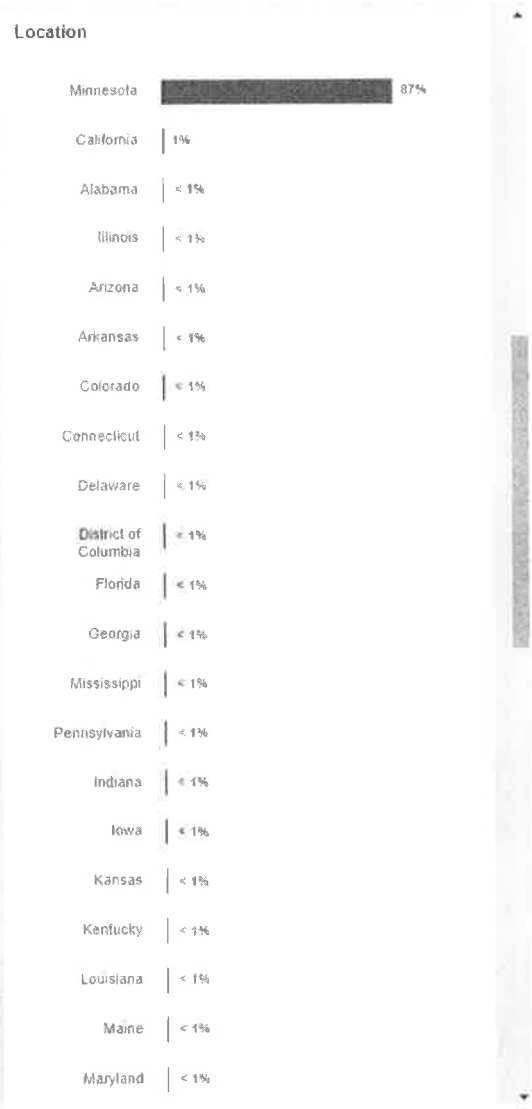
X

Reunify Families Now
Sponsored • Paid for by Care in Action

Throughout history, Americans have stood up against human rights abuses and crimes against children. By letting his party take children and babies from their parents and lock them in prisons, Erik Paulsen has betrayed American values.



Families deserve better than Rep. Erik Paulsen.
WWW.PAULSENFAILEDFAMILIES.COM [Learn More](#)



Screenshot of October 12th Ad Performance, cont.

Ad Performance



Reunify Families Now
Sponsored • Paid for by Care in Action

Throughout history, Americans have stood up against human rights abuses and crimes against children. By letting his party take children and babies from their parents and lock them in prisons, Erik Paulsen has betrayed American values.



Families deserve better than Rep. Erik Paulsen.

WWW.PAULSENFAILEDFAMILIES.COM

[Learn More](#)

New York	< 1%
North Carolina	< 1%
North Dakota	< 1%
Ohio	< 1%
Oklahoma	< 1%
Oregon	< 1%
Montana	< 1%
Nebraska	< 1%
South Carolina	< 1%
South Dakota	< 1%
Tennessee	< 1%
Texas	< 1%
Utah	< 1%
Vermont	< 1%
Virginia	< 1%
Washington	< 1%
Wisconsin	< 1%
Wyoming	< 1%

Additional Disclaimer Information

Advertisers provide this information voluntarily.

Disclaimer
Care in Action

Screenshot of October 12th Ad Performance, cont.

Exhibit E

Ad Performance



Reunify Families Now
Sponsored · Paid for by Care in Action

If Rep. Erik Paulsen won't fight to protect children from being ripped away from their parents, he doesn't deserve to speak for Minnesota families.



Families deserve better than Rep. Erik Paulsen
WWW.PAULSENFAILEDFAMILIES.COM

[Learn More](#)



Reunify Families Now
[View more ads from this Page](#)

Paid for by Care in Action

When an advertiser categorizes their ad as being related to politics or issues of national importance, they are required to disclose who paid for the ad. [Learn more](#)

[See additional disclaimer information](#)

Ad Performance



Inactive

Oct 7, 2018 - Oct 23, 2018

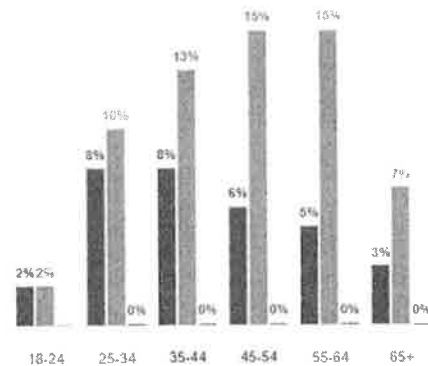
10K - 50K
Impressions

\$500 - \$999
Money spent (USD)

Audience Breakdown

Age and Gender

Men Women Unknown



Screenshot of October 7th Ad Performance

Ad Performance

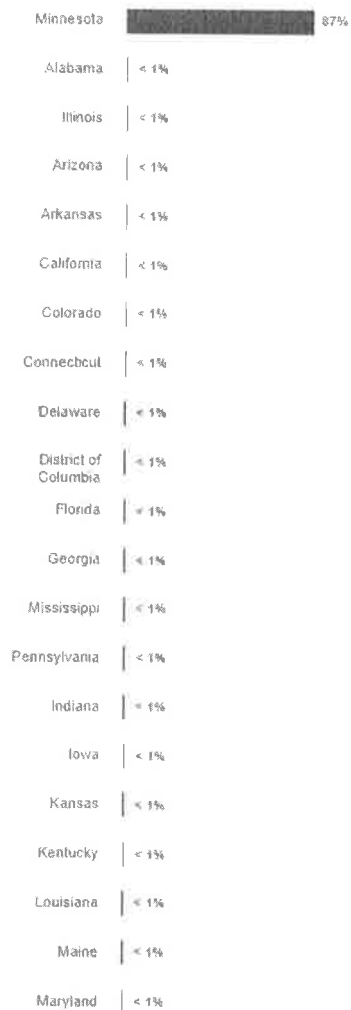


Reunify Families Now
Sponsored • Paid for by Care in Action

If Rep. Erik Paulsen won't fight to protect children from being ripped away from their parents, he doesn't deserve to speak for Minnesota families.

Families deserve better than Rep. Erik Paulsen
WWW.PAULSENFAILEDFAMILIES.COM [Learn More](#)


Location




Screenshot of October 7th Ad Performance, cont.

Ad Performance



 **Reunify Families Now**
Sponsored · Paid for by Care in Action

If Rep. Erik Paulsen won't fight to protect children from being ripped away from their parents, he doesn't deserve to speak for Minnesota families.



Families deserve better than Rep. Erik Paulsen
WWW.PAULSENFAILEDFAMILIES.COM [Learn More](#)

New York	< 1%
North Carolina	< 1%
North Dakota	< 1%
Ohio	< 1%
Oklahoma	< 1%
Oregon	< 1%
Rhode Island	< 1%
Montana	< 1%
South Carolina	< 1%
South Dakota	< 1%
Tennessee	< 1%
Texas	< 1%
Utah	< 1%
Vermont	< 1%
Virginia	< 1%
Washington	< 1%
Wisconsin	< 1%
Wyoming	< 1%

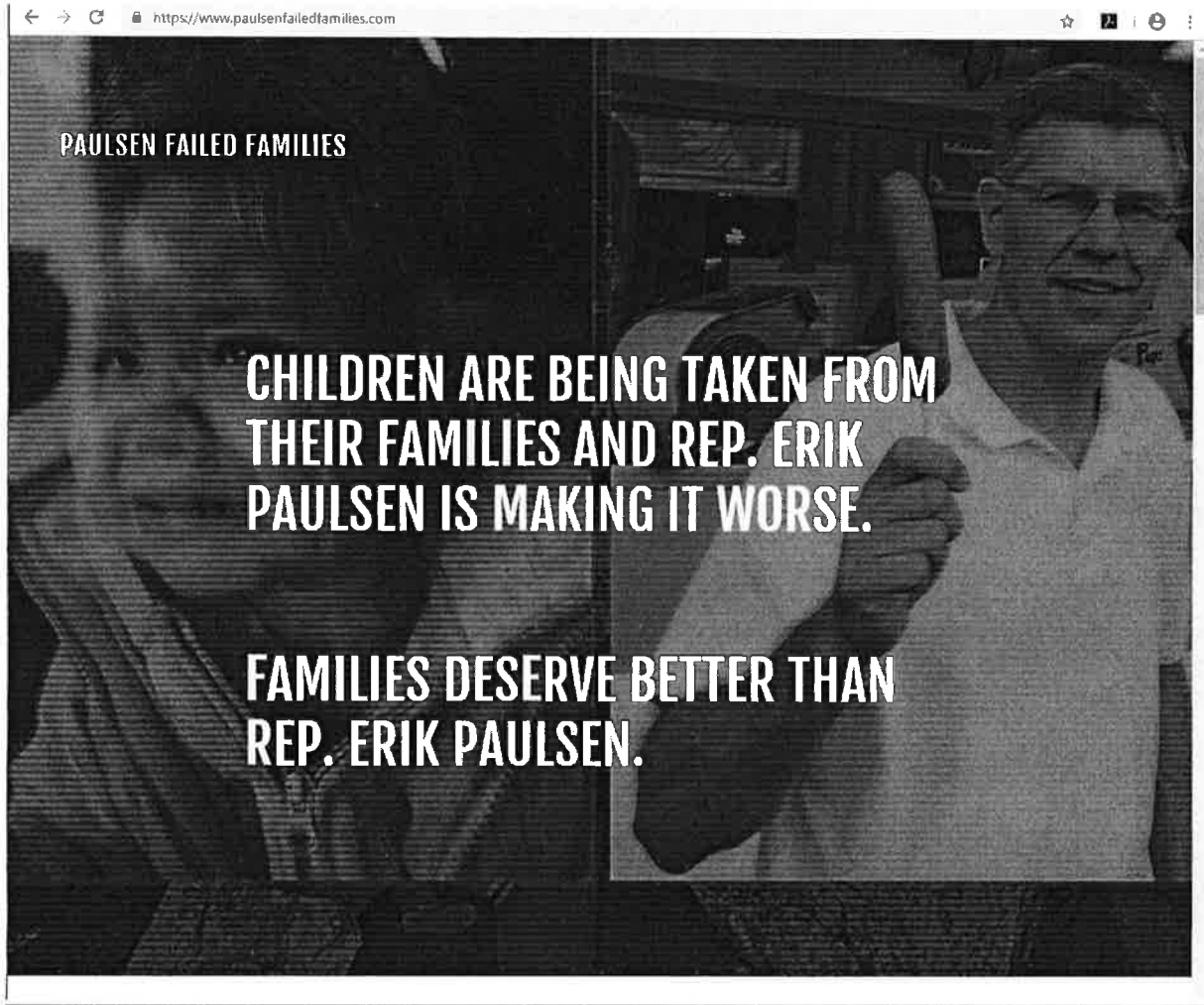
Additional Disclaimer Information

Advertisers provide this information voluntarily.

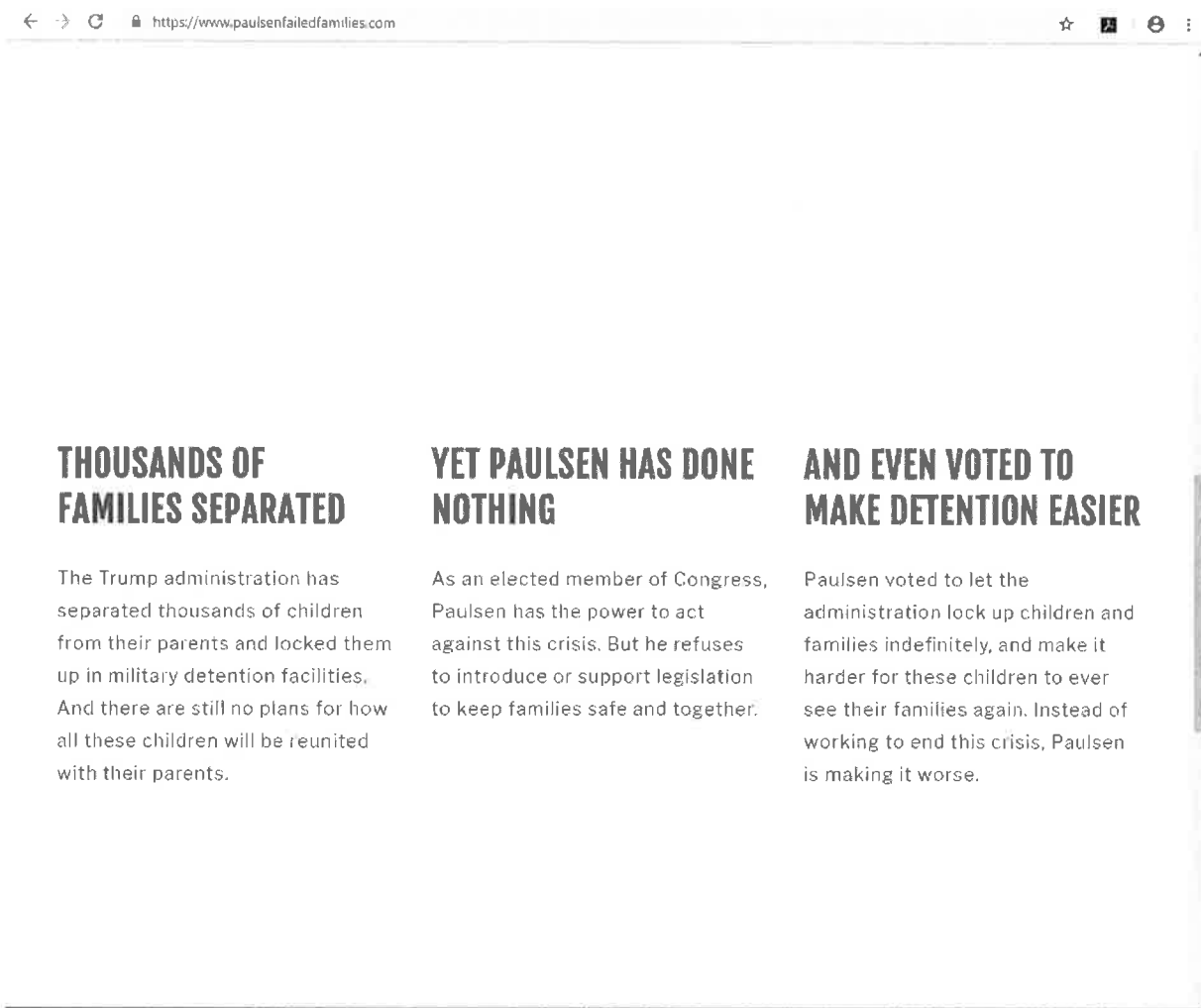
 Disclaimer
Care in Action

Screenshot of October 7th Ad Performance, cont.

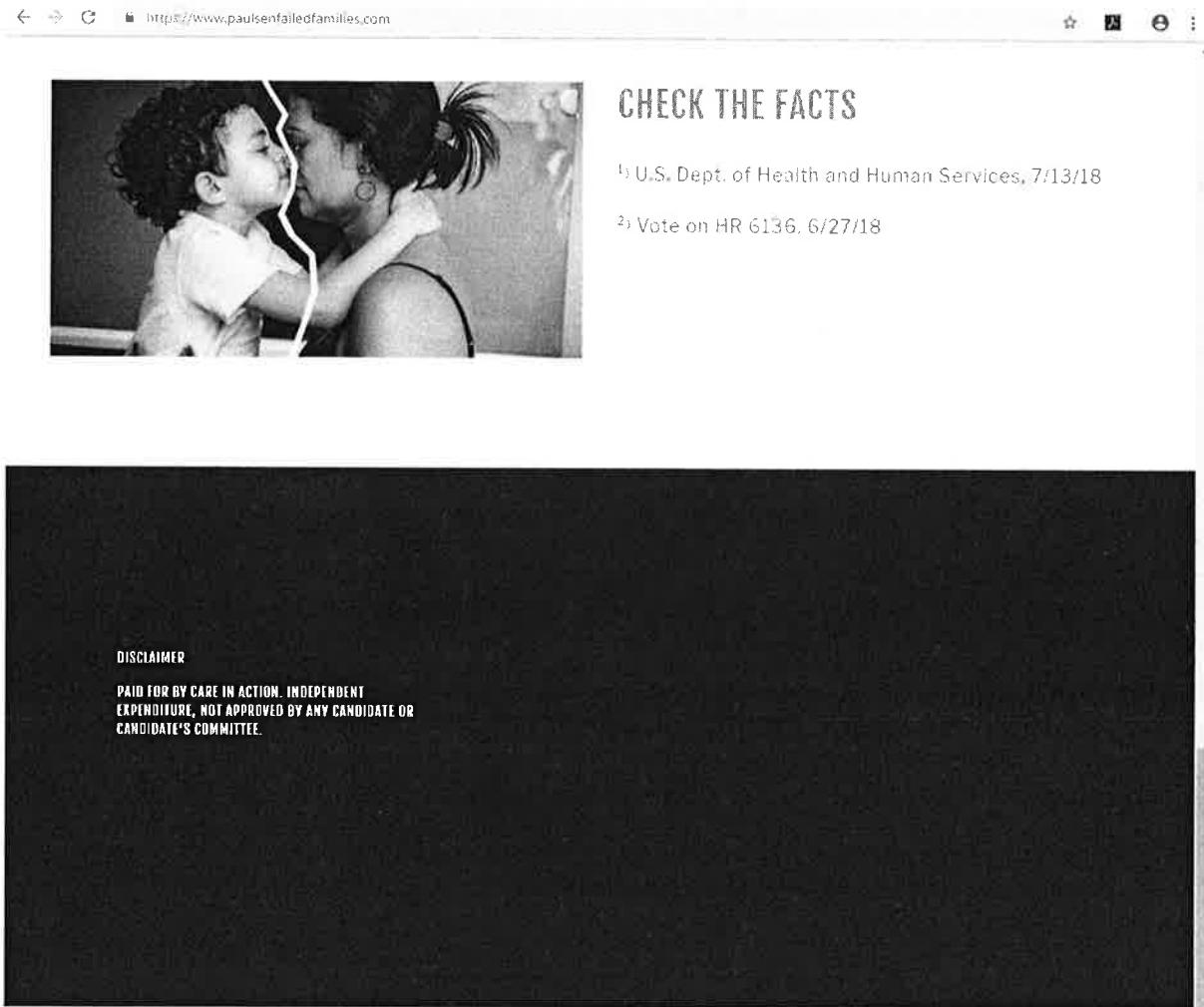
Exhibit F



Screenshot of Website



Screenshot of Website, cont.



Screenshot of Website, cont.