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FEDERAL ELECTION COMMISSION
APR 3, 2020 3:59 PM
OFFICE OF GENERAL COUNSEL

Gerry Lea Fuller

Houston, TX 77031

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

Dear Sir or Madam:

I wish to file a formal complaint against the campaign Johnny Teague for Congress, the Republican Congressional candidate for Texas' 9th Congressional District. Mr. Teague has violated a number of campaign laws, including but not necessarily limited to the following:

1. Failure to provide a disclaimer on his online political advertisements as provided by 11 C.F.R. § 110.11.
2. Advertising and marketing his private business while running for elected office in violation of FCC rulings.
3. Violation of the Johnson Amendment.

Mr. Teague (Teague) ran, on the Fox 26 Houston television station, numerous advertisements for his private business, Church at the Cross (Church), between February 13th, 2020, and March 2nd, 2020. According to numerous FCC rulings, advertising your private business when running for office is considered a violation of election laws as it provides an unfair advantage to that specific candidate. In this specific Republican primary race, the three candidates were all business owners, and only one of them decided to run advertisements for his business during early voting and election day. The candidate that did run advertisements was the candidate to win the primary. Teague's campaign Facebook page and his campaign website make reference to his church. By doing this, he has effectively merged his business and his campaign. His advertisements for his church, as such, did not contain a political disclaimer as required by law, and hence he has violated the law. Just as television networks pulled Donald Trump's *'The Apprentice'* episodes during his 2016 candidacy, Fox 26 Houston and Teague should not have presented or run these advertisements.

Teague's Church has repeatedly violated the Johnson Amendment, which as you are aware requires nonprofit organizations to be politically neutral. The Church Facebook page repeatedly allows comments on it alluding to his political campaign from his supporters. Additionally, his campaign headquarters was the address of his Church,

which is certainly not being fair and impartial. Finally, the Church used Facebook, Messenger, and other communication platforms to communicate his campaign directly to his parishioners and anyone else following the Church's page.

It is for these reasons that I respectfully request an investigation to be opened and appropriate remedies taken.

Sincerely,


Gerry Lea Fuller

TEXAS NOTARY ACKNOWLEDGEMENT

State of TEXAS

County of Harris

The foregoing instrument was acknowledged before me Susan Jonesia, (notary officer) this 26th day of March, 2020. On this day personally appeared Gerry Lea Fuller, proved to me through TX Driver License (description of identity card) to be the person whose name is subscribed to the foregoing instrument and acknowledged to me that she executed the same for the purposes and consideration therein expressed.

This complaint was signed and sworn to before me.

Given under my hand and seal of office this 26th day of March 2020.

Susan Jonesia

Notary Public Signature

Susan Jonesia

Notary Name

My commission expires: 04-10-2023



