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FEDERAL ELECTION  
COMMISSION

BEFORE THE FEDERAL ELECTION COMMISSION OF THE UNITED STATES OF AMERICA

2020 JUN 22 PM 2: 20

In the Matter of:

Nicholas Jones

**CELA**

MUR No. 7751

**COMPLAINT**

1. Complainant brings this complaint before the Federal Election Commission ("FEC" or "Commission") seeking an immediate investigation and enforcement action against the candidate for Idaho's 1st Congressional District, Mr. Nicholas Jones, for direct and serious violations of the Federal Election Campaign Act ("FECA" or "Act").
2. This complaint is filed pursuant to 52 U.S.C. § 30109(a)(1) and is based on information providing reason to believe that:
3. Mr. Jones has failed to register with the FEC in violation of 52 U.S.C. § 30103.
4. Mr. Jones have failed to disclose both receipts and disbursements in violation of 52 U.S.C. § 30104 and 11 C.F.R. § 104.3(b).

**STATEMENT OF THE LAW**

5. Each authorized campaign committee shall file a statement of organization no later than 10 days after designation pursuant to 52 U.S.C. § 30103.
6. A political committee is required to file reports of disbursements in accordance with the provisions of 52 U.S.C. § 30104; see also 11 C.F.R. § 104.3(b).

**STATEMENT OF FACTS**

7. Mr. Nicholas Jones is a candidate for the U.S. House of Representatives in Idaho's 1st Congressional District.<sup>1</sup>
8. On March 27, 2020, Mr. Jones created a Facebook page for his campaign for Congress.<sup>2</sup>
9. According to Facebook, Mr. Jones began paying for ads in support of his campaign for Congress as early as April 6, 2020.<sup>3</sup>
10. Additionally, Mr. Jones has a campaign website, nicholasforcongress.com, which was registered March 29, 2020.<sup>4</sup>
11. Mr. Jones' is soliciting contributions to his campaign online.<sup>5</sup>
12. Based upon information and belief, Mr. Jones' campaign has also made expenditures for campaign activities including but not limited to yard signs and paid telephone calls.

<sup>1</sup> Betsy Russell, "Eye on Boise: Now that the race is on, some candidate news...", *Idaho Press* (Apr. 4, 2020).

<sup>2</sup> Nicholas for Congress, Facebook, <https://www.facebook.com/Nicholasforcongress> (found under "Page Transparency").

<sup>3</sup> Facebook Ad Library, [Search for Nicholas for Congress](#).

<sup>4</sup> Internet Corporation for Assigned Names and Numbers, ICANN Lookup, Search for nicholasforcongress.com, <https://lookup.icann.org/lookup>.

<sup>5</sup> Jones for Congress LLC, PayPal, [https://www.paypal.com/donate/?token=s7Y8Jmj\\_Ad8yfPWONFMmN0V5bNkhEII03CexFii1AxBwbR8b9ytOc2Q\\_LXD4dzKzJD0Hym&country.x=US&locale.x=US#](https://www.paypal.com/donate/?token=s7Y8Jmj_Ad8yfPWONFMmN0V5bNkhEII03CexFii1AxBwbR8b9ytOc2Q_LXD4dzKzJD0Hym&country.x=US&locale.x=US#)



13. According to the FEC, Mr. Jones has not registered as a candidate for federal office.<sup>6</sup>

**CAUSE OF ACTION**

**AGAINST RESPONDENT MR. NICHOLAS JONES**

**Failure to Register with the FEC in Violation of 52 U.S.C. § 30103**

14. All candidates for federal office are required to file with the FEC pursuant to 52 U.S.C. § 30103. However, despite publicly declaring his campaign, soliciting contributions, and making expenditures for campaign materials, the FEC does not appear to have any record that Mr. Nicholas Jones has filed as a candidate. This is in clear violation of the FECA.

**Failure to Report Receipts and Disbursements in Violation of 52 U.S.C. § 30104 and 11 C.F.R. § 104.3(b)**

15. Further, candidates for federal office are required to file reports of receipts and disbursement. Mr. Jones is accepting online contributions and making expenditures for campaign materials. However, as he has not yet filed with the FEC, there has been no public disclosure of these transactions in violation of 52 U.S.C. § 30104 and 11 C.F.R. § 104.3(b).

**PRAYER FOR RELIEF**

16. Wherefore, the Commission should find reason to believe that Mr. Nicholas Jones has failed to meet even the most basic standards of public transparency by failing to register as a candidate with the FEC, and failing file reports of receipts and expenditures in violation of 52 U.S.C. §§ 30103-30104 and 11 C.F.R. § 104.3(b). The Commission should conduct an immediate investigation under 52 U.S.C. § 30109(a)(2) to determine and impose appropriate sanctions for any and all violations. Further, the Commission should enjoin respondents from any future violations, and impose any necessary and appropriate remedies to ensure respondents future compliance with FECA.

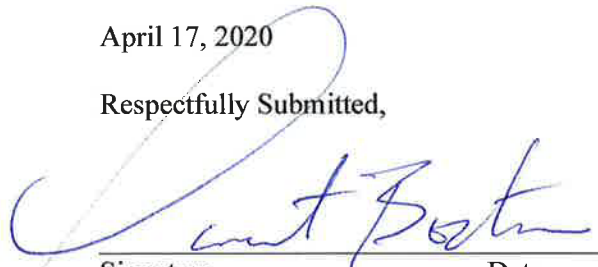
April 17, 2020

Respectfully Submitted,

Signature

Date

Printed

 4-22-2020  
 LaMont BOSTROM  
 NAMPID ID 83651

<sup>6</sup> FEC, Search for Nicholas Jones, <https://www.fec.gov/search/?type=candidates&type=committees&type=site&query=Nicholas+Jones>



## VERIFICATION

17. The complainants listed below hereby verify that the statements made in the attached Complaint are, upon their information and belief, true.

For Complainant

Signature

Date

4.22-2020

Printed

LaMont Bostrom

Sworn to and subscribed before me this 22 day of April



Notary Public

A handwritten signature in blue ink, appearing to read "Miles S. Hyndman", written over a horizontal line.