FECTURE LEATER

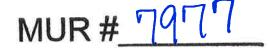
2022 APR -8 AM 10: 24

April 3rd, 2022

Federal Elections Commission

999 E Street, NW

Washington, D.C. 20463



RE: FEC AMENDED COMPLAINT FOR U.S. SENATE RACE IN OREGON

Please find (enclosed) three copies of an AMENDED COMPLAINT regarding alleged Federal Election Commission (FEC) campaign advertising disclosure violations in the current 2022 U.S. Senate Republican primary election in Oregon.

- The original complaint was duly notarized, but not attested to; This AMENDED COMPLAINT resolves that technicality;
- Enclosed you will find three copies of the AMENDED COMPLAINT and supporting documentation;
- Originally, three separate, individual FEC campaign advertising disclosure complaints were filed; This AMENDED COMPLAINT aggregates those three previously submitted individual complaints into one;
- All three original Respondents are included in this AMENDED COMPLAINT;
- One additional Respondent, Samuel Palmer, is named in this AMENDED COMPLAINT;
- All of the candidates declared to be in violation of FEC campaign advertising disclosure guidelines that are named as Respondents in this pending complaint were given constructive verbal notice in a public forum held on March 31, 2022 in Corvallis Oregon at a meeting of the Benton County (Oregon) Republican Party;
- In addition to the AMENDED COMPLAINT, I have included copies of the supporting documentation needed to visually substantiate the validity of my complaint; In each package you will find that there are copies of each of the offending/improper/illegal signs as well as a copy of the Complainants (my) Candidate Committee's yard sign, which follows the correct format. With the enclosed documents, you will also find a copy of the FEC guidelines for campaign yard signs in federal elections with a visual example of the FEC requirements. This information can easily and readily be found conveniently on the FEC's website.

Thank you in advance for your consideration of my concerns. Please help clean up and reform the apparent apathy and ignorance towards federal election laws here in Oregon.

In this case in particular, ignorance of these important laws should be no excuse for an entire group of candidates at the federal level to ignore or defy the very government they seek to represent.

Best regards,

Chris Christensen

Beaverton, Oregon

SENERAL COUNSE

April 3rd, 2022

Office of General Counsel
Federal Elections Commission
999 E Street, NW
Washington, D.C. 20463

AMENDED COMPLAINT

This is an **AMENDED COMPLAINT** Regarding Multiple Alleged Federal Election Commission (FEC) Campaign Advertising Disclosure Violations in the U.S. Primary Senate Race in Oregon Occurring from February 2022 Through March 31, 2022 and Ongoing

Complainant: Chris C. Christensen, Candidate for United States Senate in Oregon (2022); 16055 SW Walker Road #132, Beaverton, OR 97006, Committee ID# COO806414, Candidate ID 1571945

Respondent(s): Darin Harbick, Candidate for United States Senate in Oregon, Committee ID COO788463, Candidate ID S2OR00168; Respondent: Jo Rae Perkins, Candidate for United States Senate in Oregon, Committee ID COO582635; Candidate ID S4OR00156; Respondent: Ibrahim Taher, Candidate for United States Senate in Oregon, Committee ID COO720094; Candidate ID 1576308

Additional Respondent: Samuel Palmer, Candidate for United States Senate in Oregon, Committee ID: COO788000, Candidate ID 1536420

To Whom It May Concern:

BACKGROUND FACTS

- Previously, on March 28th 2022, the Complainant (Christensen) filed three separate formal complaints alleging improper campaign advertising disclosures, particularly related to yard signs & website videos, against several Republican candidates in the race for United States Senate from Oregon.
- Christopher C. Christensen, Complainant, is a Republican candidate for United States Senate from Oregon in the 2022 primary election;
- The Oregon Primary election is May 17th, 2022.
- As previously submitted, there have been numerous alleged FEC violations committed by several current candidates for federal office involving incorrect or missing campaign advertising disclosures in the Oregon primary race for U.S. Senate.

At a public debate held March 31st 2022 in Corvallis Oregon, all of the candidates who
are listed as Respondents in this complaint were given constructive notice in an open
public forum. The response was generally one of ignorance and apathy towards Federal
Elections Commission regulations and guidelines. Even after being confronted openly
with the violations, these candidates continue to defiantly and flagrantly flaunt FEC
regulations regarding campaign advertising disclosure requirements for federal Senate
candidates.

AMENDED COMPLAINT

1. FEC Disclaimer Requirements - Public Communications

FEC defines public communications as a communication made by means of "any other form of general public political advertising" (100.26, 100.27 and 100.28) and that "any public communication made by the political committee, even those that do not contain a solicitation or express advocacy, *must* include a disclaimer" (52 U.S.C. 30122220(a); 110.11(a)(1).

Wording of disclaimer notice – Authorized and financed by campaign

FEC states that "if the candidate or campaign authorizes and finances a covered communication (including any solicitation), the notice must state that the communication was paid for by the authorized committee"

Example: "Paid for by the Sam Jones for Congress Committee." 110.11(b)(1).

NATURE OF COMPLAINT

- 2: **Nature of Complaint** Violation of Campaign Advertising Disclosure Requirements for websites and social media/internet
 - On March 31st 2022, in a public debate held in Corvallis Oregon by the Benton County Republicans, every Republican candidate at the debate was notified of the FEC guidelines regarding campaign advertising disclosures for yard signs in federal elections:
 - Two Respondents (Taher & Harbick) have posted campaign communications on their internet websites and YouTube with NO campaign advertising disclosures. These communications were/are also posted on other social media platforms controlled by the Respondents. These communications are clearly campaign political advertising pieces promoting the Respondents policies on election issues;
 - These communications, which are still available for viewing at this time, have no required FEC campaign advertising disclosures whatsoever and they appear to be in clear violation of FEC campaign advertising disclosure regulations.
 - Here is just one of the links (Harbick): https://youtu.be/LBsoWZEd3xw
 - The respondents collectively have several other examples of incorrect or missing campaign advertising disclosures posted on their websites and on multiple social

media outlets and the Complainant therefore requests that the FEC further investigate this matter as an egregious and blatant violation of campaign advertising disclosure regulations by several active candidates for federal office.

Additional Example (Taher): https://youtu.be/YE0NfW8dUB8

ADDITIONAL COMPLAINT/VIOLATIONS

2. Additional Complaint – Violation of Campaign Advertising Disclosure Requirement for Yard Signs in Federal Elections

Four out of seven candidates (Harbick, Palmer, Perkins and Taher) in the United States Senate race from Oregon have been improperly and illegally displaying campaign yard signs with either:

- no required campaign advertising disclosure,
- improper disclosures, or
- disclosures not prominently or correctly displayed.

The purpose of this **AMENDED COMPLAINT** is to:

- Aggregate multiple previously submitted complaints into one single complaint;
- Update the Federal Elections Commission with Additional Violations and Complainants;
- Provide Additional Documentation/Evidence;
- Provide Notification to FEC that all named Respondents in this AMENDED COMPLAINT
 were given open, public, constructive notice of the alleged campaign advertising
 disclosure violations with respect to this complaint on March 31, 2022.

Additionally, the original complaint was notarized but not attested to, this **AMENDED COMPLAINT** also is duly sworn, attested to and notarized as required under FEC complaint guidelines.

If you need any additional information, please do not hesitate to contact me.

Thank you in advance for your consideration of my concern.

Sincerely,

Signature of Complainant: Chris C. Christensen

16055 S.W. Walker Road #132

Beaverton, OR 97006

Direct/Text

SIGNED, SWORN TO (ATTESTED) AND NOTARIZED BY:

State of: Octom

County of: WATINGTON

This FEC complaint was duly signed and sworn to (or affirmed) before me on

4/4/2022 (date)

by CHRISTORM CHRISTENCEN (name(s) of individual(s) making statement.

Signature of notarial officer:

Notary Stamp:

OFFICIAL STAMP
SALEEM MAJID
NOTARY PUBLIC - OREGON
COMMISSION NO. 1003123
MY COMMISSION EXPIRES AUGUST 18, 2024

Title of office: $\mathcal{O}^{PS} \circ f_{re}$ My commission expires:

08/18/2024

APPENDIX A: SUPPORTING DOCUMENTATION





EXAMPLE

Candidate committee yard sign example

YARD SIGN EXAMPLE



This is an example of the disclaimer notice required for a yard sign paid for by a candidate committee. The disclaimer notice must state that the communication was paid for by the authorized committee. In printed communications, the disclaimer must be contained within a printed box set apart from the contents of the communication. The print of the disclaimer must be of sufficient size to be "clearly readable" by the recipient of the communication, and the print must have a reasonable degree of color contrast between the background and the printed statement.

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