

**BEFORE THE
FEDERAL ELECTION COMMISSION**

Dr. Diana Cabbage

West Linn, OR 97068

Complainant,

v.

Jamie McLeod-Skinner
12986 SW Wheat Grass Road
Terrebonne, O.R. 97760

Jamie for Oregon and Jef Green
PO Box 42307
Portland, O.R. 97242

MUR # 7995

2007 MAY 4 AM 8:17

OFFICE OF
GENERAL COUNSEL

Respondents.

COMPLAINT

This complaint is filed under 52 U.S.C. § 30109(a)(1) against Jamie McLeod-Skinner, Jamie for Oregon and Jef Green in his official capacity as treasurer, collectively the “Respondents,” for violating the Federal Election Campaign Act of 1971, as amended (the “Act”) and Federal Election Commission (the “FEC” or “Commission”) regulations. Respondents violated federal law and regulations by failing to include the required disclaimer on yard signs financed and distributed by Respondents. The disclaimer requirement exists precisely to ensure that Americans are always clearly and conspicuously informed of who paid for and authorized the electoral advertisements that attempt to influence their vote. In this case, Respondents denied the public the transparency to which it is entitled under the law. Consequently, the Commission should immediately investigate and take appropriate remedial action against Respondents.

FACTS

Jamie McLeod-Skinner is a candidate for election to the U.S. House of Representatives in Oregon's 5th congressional district.¹ Jamie for Oregon is McLeod-Skinner's principal campaign committee and Jef Green is its treasurer.²

Respondents have shared on the campaign's Facebook page multiple pictures of yard signs in people's lawns with McLeod-Skinner's name and logo. However, in none of the signs pictured is the required disclaimer included on the yard signs. In addition to posting pictures of the yard signs,³ Respondents have also offered to provide the yard signs to supporters through a link in multiple social media posts, as shown below.⁴ The link included in those posts includes Respondents' campaign logo as well as links to Respondents' official ActBlue page, merchandise store, and volunteer sign-up webpage.⁵

¹ Fed. Elec. Comm'n Form 2, Statement of Candidacy of Jamie McLeod-Skinner (Oct. 26, 2021), <https://docquery.fec.gov/pdf/979/202110269468350979/202110269468350979.pdf>.

² Fed. Elec. Comm'n Form 1, Statement of Organization of Jamie for Oregon (Oct. 25, 2021), <https://docquery.fec.gov/pdf/784/202110259468349784/202110259468349784.pdf>.

³ See Jamie McLeod-Skinner for Oregon Facebook Post, Apr. 4, 2022, <https://www.facebook.com/login/?next=https%3A%2F%2Fwww.facebook.com%2FJamieForOregon%2Fposts%2F516777193147479>.

⁴ Jamie McLeod-Skinner for Oregon Facebook Post, Apr. 1, 2022, [https://www.facebook.com/login/?next=https%3A%2F%2Fwww.facebook.com%2FJamieForOregon%2Fposts%2F510609590430906%3F_cft_%255B0%255D%3DAZVX3fTUf34aFSc60kLfOKndgXh_DouXEKBIWJKf_mPn8SieHGXXaV_zoHjxsJfdGgpj95JeOkIxNvwz9e1R5wSdtm9KR79CJBjraa27S9eEuVqM11kH0ILu8v_xHl4yYcc66suelvPuhkYRCh6Nnr4c%26_tn_%3D%252CO%252CP-R](https://www.facebook.com/login/?next=https%3A%2F%2Fwww.facebook.com%2FJamieForOregon%2Fposts%2F515026506655881%3F_cft_%255B0%255D%3DAZWXn095vahk2tVwIKDgk2tZ2-fDrroaGt7pUiJFC-IK89bre8vaNtSBDZipJjpYOb0ojHqyjf-OY1Dm-gFh8b64YuNYwEmvm3rn7FOMlkSvBEkfxU8fhBly2T-8ELlgpUZC6Kz4eLxZoA2J6uAG5DJF9UP5sy_PQFU_KZJsVAZRw%26_tn_%3D%252CO%252CP-R; Jamie McLeod-Skinner for Oregon Facebook Post, Mar. 25, 2022, <a href=).

⁵ "Jamie Yard Sign Requests" Google Form (last accessed Apr. 26, 2022), <https://docs.google.com/forms/d/e/1FAIpQLSceViMnKluIB2WaPSo3oAxE9RkJdhBFCewzyUGqeFwnqT-xA/viewform>.



Jamie McLeod-Skinner for Oregon is with American Federation of Teachers, Local 1481 and 12 others.

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March 25 at 11:05 AM · 🌐

Yard Signs! With only 53 days until our May 17th primary, you can now proudly display your support most locations with a yard sign. Jamie is the Democrat endorsed by the Clackamas, Deschutes, Linn & Marion County Democrats. Fueled with ZERO Big Pharma Money - Jamie will fight for working families. Show your support today. Sign up below to for pick up, delivery or shipping.

<https://forms.gle/Q1BgR88uZBtyshdy8>

*sign up for free pick up or delivery (where available)... See more





Jamie McLeod-Skinner for Oregon

April 3 at 10:45 AM



Yard Signs - show your support by displaying yours today. Sign up below for FREE signs for pick up or delivery OR order one to be shipped directly.

<https://forms.gle/QtBgR8SiiZ2tyshdy8>

*sign up for free pick up or delivery (where available)... See more





Jamie McLeod-Skinner for Oregon

April 4 at 12:37 AM · 🌐

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Great weekend in Linn County with events in Albany and Lebanon. A topic of discussion at all my events was protecting our environment and leaving future generations a livable planet. There is a stark difference between me and my opponent when it comes to tackling the climate crisis.

I have a track record of protecting the environment, and I will vote to protect our air, rivers, and wildlife over corporate profits.

My opponent has voted to weaken environmental protections and stripped clean energy investments out of the infrastructure bill. While he's taken almost \$300,000 in oil & gas industry money, I have signed the No Fossil Fuel Money pledge.



Although there appear to be at least two versions of the yard signs, both versions include iterations of the name, logo, colors, and branding posted on Respondents' campaign website.⁶ Respondent also features yard signs available for sale on their campaign website and none of those signs include the required disclaimer, as shown below.⁷

⁶ Jamie McLeod-Skinner for Oregon (last accessed Apr. 26, 2022), <https://jamiefororegon.com/>.

⁷ Jamie for Oregon Store (last accessed Apr. 26, 2022), <https://store.jamiefororegon.com/>.

GET JAMIE'S CAMPAIGN YARD SIGN



JMS Pride Yard
Sign
\$25.00



JMS Blue Yard
Sign
\$25.00



JMS White Yard
Sign
\$25.00



JMS Yard Sign
Pack
\$55.00

LEGAL DISCUSSION

Under the Act, a political committee must include a “paid for by” disclaimer on all public communications that it finances or distributes.⁸ The Commission has published guidance that confirms the “paid for by” disclaimer must be included on yard signs because such signs are printed public communications.⁹ Here, Respondents failed to include the required disclaimer on numerous yard signs that it distributes to its supporters.

Respondents have completely failed to comply with the disclaimer requirement by not including the name of McLeod-Skinner’s principal campaign committee. Respondents have repeatedly chosen to ignore these rules and circulate yard signs that deprive the public of the transparency the law requires. These repeated violations of the law undermine the very purpose

⁸ 52 U.S.C. § 30120(a); 11 C.F.R. § 110.11(a). A “public communication” is defined as “any broadcast, cable, or satellite communication, newspaper, magazine, outdoor advertising facility, mass mailing, or telephone bank to the general public, or any other form of general public political advertising.” 11 C.F.R. § 100.26.

⁹ Fed. Elec. Comm’n “Candidate committee yard sign example,” (last accessed Apr. 26, 2022), <https://www.fec.gov/help-candidates-and-committees/making-disbursements/advertising/candidate-committee-yard-sign-example/>.

of disclaimers: to ensure that all Americans know who pays for and sponsors political advertisements.

REQUESTED ACTION

As I have shown, Respondents violated the Act and Commission regulations by failing to include the required disclaimer on public communications. Specifically, Respondents appear to be printing, financing, promoting, and circulating yard signs without the required "paid for by" disclaimer, in plain violation of Commission regulations. As such, I respectfully request that the Commission immediately investigate these violations, fine Respondents the maximum amount permitted by law, and enjoin Respondents from further violations of the law.

Sincerely,

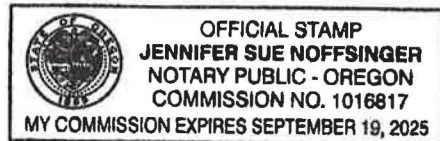
Diana Cabbage
Diana Cabbage

West Linn, OR 97068

SUBSCRIBED AND SWORN to before me this 29th day of April 2022.

JN

Notary Public



My Commission Expires: *September 19, 2025*