

**MUR 8005**

MAY 31, 2022 10:27 AM

OFFICE OF GENERAL COUNSEL

Hello, I'm writing and submitting this complaint to the FEC as I have become aware of numerous violations of state and federal election laws by Congressional Candidate for CA-48\* Stephen Houlahan (FEC Filing-1478985) and his campaign committee "Stephen Houlahan for Congress" (FEC committee ID # C00764027). Along with listing and describing the violations, I will provide URLs to websites showing some of said violations and include photo attachments to the electronic copy of this complaint.

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First and foremost, Houlahan has seemingly purposely violated FEC required disclaimer requirements for public communications/advertisements. He has made use of multiple yard signs, banners, and additional printed media. You can find clear examples of signage and banners without required disclaimers on his campaign Facebook page, his twitter, and on signs throughout the city of Santee, signs that also appear to potentially be in violation of both state and local placement and display laws. Houlahan Ran for mayor of Santee in 2020, where he violated the California Secretary of State posted, and FPPC required disclaimer laws throughout the entirety of his campaign and had previously run for city council where he would have been informed of such requirements for sign placement and disclaimer needs by the provided literature. Regardless of him reading to provided guidelines or not, as you already know, ignorance of the law is not a permissible defense for breaking it as determined by multiple court cases regarding this very subject matter. Houlahan has a clearly shown history of continuous violations of required disclaimers, a precedent of willfully ignoring the laws and regulations used for fair political practices. Additionally, Houlahan has had several websites and extensions affiliated with his campaign over the last couple years that failed to place proper disclaimers, and in the instances where he includes them like his primary campaign website, he failed to list his own committee even properly, tacking on "Houlahan for congress" instead of the committee's full name. I know that particular caveat isn't as severe, but it shows a clear flagrant disregard for the legal requirements and showcases that he is at least aware of the requirements, but then actively chose to disregard them later for his signage, something he has an extensive history of doing.

[[https://linktr.ee/electhoulahan \(no Disclaimer\)](https://linktr.ee/electhoulahan (no Disclaimer))]

[[https://electhoulahan.com/ \(misidentification of committee, but has it properly listed for the copyright\)](https://electhoulahan.com/ (misidentification of committee, but has it properly listed for the copyright))]



Secondly, Candidate Houlahan has failed to properly file in accordance with FEC regulations and maintain up to date information on his campaign efforts, potentially violating certain laws regarding fundraising, and misrepresentation of self to voters and donors. Review of FEC recorded information shows (FEC Filing-1478985) Stephen Houlahan as still filed for and running for CA-50<sup>th</sup> district, his committee is also still shown as under the same district as of at least the April 15<sup>th</sup> quarterly filing deadline. As provided on the FEC website, **“Candidates who fill out FEC Forms 1 and 2 but are uncertain if their district will change should enter the state and district (Line 5(b) on Form 1 and Line 6 on Form 2) as it exists upon the date of the filing. Filers can add memo text to Forms 1 and 2 or file a miscellaneous document (Form 99) to note the potential redistricting. If redistricting within a state subsequently changes the candidate’s district, the committee would amend their forms to update that information.”** Additionally, the FEC website states **“A candidate must report any change or correction of information contained in the Statement of Candidacy within 10 days after the change. The candidate may have to file an amendment, for example, to report changes to the candidate’s office sought, state, district, or party affiliation. If a candidate authorizes additional political committees to accept contributions or make expenditures of his or her behalf, such as authorizing a joint fundraising committee, then the candidate must file an amended Form 2 within 10 days to update the information. When a candidate amends information on the Statement of Candidacy, these changes must also be reflected on an amended Form 1.”** According to recorded files on the FEC website, Houlahan failed to include and memo text to form 1, form 2, or include a form 99 to note the possible redistricting. Houlahan also failed to report the change as required. The CA Sec. of state official government website notes that redistricting maps were finalized and approved on 12/27/2021. Putting Houlahan, and the “Stephen Houlahan for Congress” committee at least 99 days late to file the amendment as of the submitted quarterly report on 4/15, and 139 days late to file the required changes as of todays date, 05/25/2022. In addition to this, Houlahan was still actively campaigning for and raising funds as a candidate for CA-50 post redistricting and based on his filings raised over the \$5,000 USD contribution and expenditure limit in relation to CA-50 before swapping over to the CA-48 race. His records indicate that he did not refund or reimburse contributions made for the inaccurate race, and while I’m not 100% certain on this part, doesn’t raising funds or making expenses to the level of the \$5,000 threshold mark him as a candidate for the 50<sup>th</sup> requiring he file for that congressional race? Houlahan has a previous record With the FPPC of failing to meet filing deadlines setting a trend, and considering the importance of integrity, record keeping, and of Congress, these kinds of mistakes shouldn’t not be tolerated, especially for a candidate that filed late 2020, and has shown understanding of the amendment process in early 2021.

[<https://www.fec.gov/data/candidate/H2CA50174/> (candidate page showing information mentioned)]

[<https://www.fec.gov/data/candidate/H2CA50174/?tab=filings> (shows lack of required filing, no supplements, and an understanding that he knows about required amendments.)]

[<https://www.fec.gov/data/committee/C00764027/?tab=filings&cycle=2022> (same filing errors/lack of filing for committee.)]

[<https://docquery.fec.gov/cgi-bin/forms/C00764027/1478913/> (original filing)]

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Lastly, and as required I must inform you this subject isn't a known fact by me but more a concern regarding Candidate Houlahan based on his past actions at the state level and personal belief. I think there might be some failure to properly report contributions and expenditures by Houlahan and his committee. While as noted above, there is a substantial lack of proper amendments to his filing, his submitted finical reporting seems suspect to me. Houlahan is currently facing a lawsuit regarding unreported, and unidentified expenditures in connection with his 2020 mayoral campaign, Houlahan also made use of a GoFundMe fundraiser for legal defense and campaign contributions in 2021 that is not shown on any of his expense reports or show any itemized contributions tied to his congressional campaign committee in the fundraising reports. I believe given the nature of his current lawsuit, failure to disclose the GoFundMe that has since been shut down, the overwhelming disparity between itemized and non-itemized contributions from a candidate whose only listen means of donation are via ACTBLUE which keeps detailed itemized records of donations (the filing shows the money he's received via that platform.) that something doesn't seem right with his financial statements. Theres no listed mention about where his mayoral funds came from, some of which were diverted to the congressional committee in 2021, I see no listed information regarding the separation of legal fees from other donations in terms of the GoFundMe, and I do believe that use of a congressional campaign to collect donations both for said campaign and for unrelated legal fees is both prohibited and could constitute potential misappropriation of campaign funds for personal use. Houlahan as a bad record of disregarding campaign laws and failing to keep proper records. On top of this formal complaint regarding Houlahan and his committee's failure to adhere to disclaimer requirements and filing deadlines and like to request a detailed audit of his financials to ensure that funds haven't gone unreported/misreported or used for non-exempt legal or personal use.

[<https://www.gofundme.com/f/help-stephen-houlahan-fight-corrupted-government/sign-in> (now missing GoFundMe)]

[<https://www.sandiegouniontribune.com/communities/east-county/santee/story/2020-12-30/santee-resident-files-complaint-against-former-city-councilman-environmental-group#:~:text=SANTEE%20E2%80%94%20Santee%20resident%20Dan%20Bickford%20has%20filed,Va%20Collinsworth%20and%20Collinsworth%20E2%80%99s%20group%2C%20Preserve%20Wild%20Santee>. (news piece on the lawsuit.)]

From,

Matthew G. Rascon

05/25/2022.

X Matthew

Jurat 05/26/2022

Time: 14:09

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## California Jurat Certificate

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

**State of California**

**County of San Diego**

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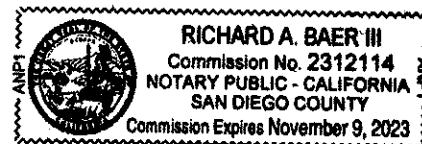
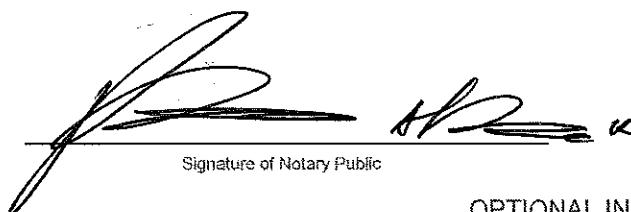
s.s.

Subscribed and sworn to (or affirmed) before me on this 26<sup>th</sup> day of May,

2022, by Matthew Gabriel Ruscon

and \_\_\_\_\_, proved to me on the basis of

satisfactory evidence to be the person(s) who appeared before me.

Signature of Notary Public

Seal

### OPTIONAL INFORMATION

Although the information in this section is not required by law, it could prevent fraudulent removal and reattachment of this jurat to an unauthorized document and may prove useful to persons relying on the attached document.

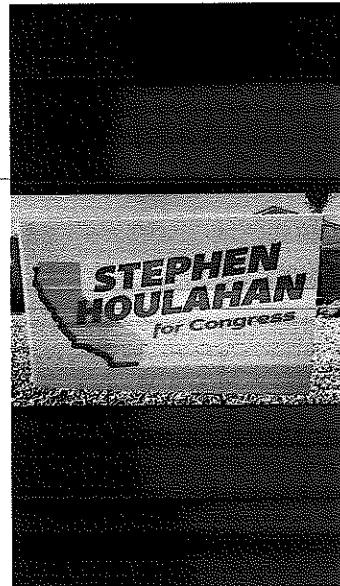
### Description of Attached Document

The preceding Jurat Certificate is attached to a document titled/for

the purpose of FEC complaint

\_\_\_\_\_

containing 04 pages, and dated 05 / 26 /2022



5:36

docquery.fec.gov

HOME / CAMPAIGN FINANCE DATA / COMMITTEE DETAILS / HTML VIEWER

**FEC FORM 3**

REPORT OF RECEIPTS AND DISBURSEMENTS

For An Authorized Committee

FILING FEC-1587214

1. Stephen Houlahan for Congress  
PO Box 733839  
San Jose, California 92072

State is California in District: 50

2. FEC Committee ID #: C00764027

3. This report is NOT an AMENDMENT

4. Report Type = APR QUARTERLY  
Filed 04/15/2022

**SUMMARY PAGE**

**DETAILED SUMMARY PAGE**

Schedule A Filings (ITEMIZED RECEIPTS)  
Schedule B Filings (ITEMIZED DISBURSEMENTS)

(End FEC FORM 3)

**SUMMARY PAGE**

**Of Receipts And Disbursements**

5. Covering Period 01/01/2022 Through 03/31/2022

	Column A Date Paid	Column B Election Cycle/TC Date
6. Net Contributions (Schedule A)		
(A) Net Contributions After Date Filed	5256.16	35976.45
(B) Total Cash Balances	0.00	0.00
(C) Net Contributions (Schedule A)	5256.16	35976.45
7. Net Operating Expenditures		
(A) Total Operating Expenditures	4332.92	28529.73
(B) Total Prints & Circular Expenditures	0.00	0.00
(C) Net Operating Expenditures	4332.92	28529.73
8. Cash on Hand Balances		
(A) Cash and Disbursements Owed to the Committee Balances after Schedule C (Schedule B)	0.00	
(B) Total Cash Balances	0.00	
(C) Net Cash Balances (C) - Schedule B	0.00	

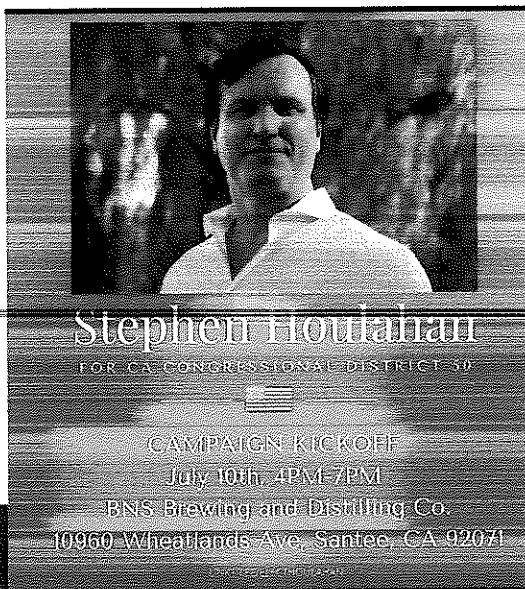
(End Summary Page, FEC FORM 3)

**DETAILED SUMMARY PAGE**

**Of Receipts And Disbursements**

	Column A Date Paid	Column B Election Cycle/TC Date
1. RECEIPTS		

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