

# MUR # 8005 SUPPLEMENT

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).

I previously submitted a complaint that said the following: " 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.

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 his 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://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-50th district, his committee is also still shown as under the same district as of at least the April 15th 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 over 150 days late to file the

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required changes as of today's date, 06/25/2022. 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 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 50th 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 supplementals, 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)]

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 financial 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 listed 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. There's 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 has 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%20%E2%80%94%20Santee%20resident%20Dan%20Bickford%20has%20filed,Van%20Collinsworth%20and%20Collinsworth%E2%80%99s%20group%2C%20Preserve%20Wild%20Santee.> (news piece on the lawsuit.)]."

As of today's date, 09/25/2023, Stephen Houlihan has far from stopped in breaking the laws and regulations required by the FEC, during the remainder of the 2022 campaign, he continued to

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use signage and banners without required disclaimers. Additionally, there does not appear to be any listed penalties for his unreported GoFundMe.

His committee is failing to file properly with each report listing the 50<sup>th</sup> district instead of the 48<sup>th</sup> district, something Houlihan did for the entirety of the 2022 primary both with his committee and as a candidate.

(Info: <https://www.eastcountymagazine.org/former-santee-councilman-houlihan-will-run-congress#:~:text=In%20the%20suit%20filed%20Dec.%208%20in%20San,leading%20up%20to%20the%20most%20recently%20completed%20elections.>),

And since the time of the first filing, I discovered that Houlihan in fact failed to report gift-in-kind donations totaling upwards of \$10,000 USD or more from one Van Collinsworth and one Olson Remcho for legal fees covered. The lawsuit in question was in no way connected to Houlihan's congressional campaign but tied to reported illegal activity during a city mayoral campaign where Houlihan allegedly failed to disclose donations and involvement in a ballot measure, though the coverage of legal fees was given to him by Collinsworth as a favor for him as a congressional candidate.

Houlihan Has a documented track record of failing to disclose contributions and gifts dating back to city level campaigns in the 2010s, in addition to this he has failed to file appropriate required documents in a timely fashion.

Houlihan failed to register with the FEC as a candidate for California's 48<sup>th</sup> district until after the primary election, his committee financial reports still show on your own database to be filed for a different district entirely. His campaign committee also appears to not provide truthful and accurate information from the wrong district being reported to providing the email of a third-party compliance company instead of one for the committee itself.

On top of this, Houlihan (FILING FEC-1603791) is far past the point of "testing the waters" for a 2024 run. He has been actively campaigning since at least January of 2023, and has made statements at democratic club meetings that he has in fact been campaigning since the end of the 2022 election has asked for donations numerous times, sought out endorsements, and even had a "campaign kickoff event" however he has failed to file his declaration of candidacy as required by law for the election as of today's date 07/06/2023. Houlihan and his campaign held on to funds from the 2022 election and continued campaigning for 2024 without him registering/declaring candidacy, something that congressman Issa was sure to do as required of him.

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His 2022 campaign made use of legally questionable robocalling, his contribution info for both 2022 and 2024 doesn't seem to account for contributions given at fundraiser events, and the totals for expenses don't add up, or don't seem to fall within the parameters set by the FEC such as Houlihan's spending of 1,676.14 USD at RESIDENCE INN BY MARRIOTT LOS ANGELES L.A. LIVE, LA county is in no way connected to the 48<sup>th</sup> district and Houlihan did not have fundraising activities in LA.

Houlihan has had nearly a decade of experience having to file proper paperwork and at this point it goes beyond the realm of inexperience and into full blown negligence and willful disregard.

Houlihan is a problematic candidate that has scoffed at the rules numerous times in his political endeavors, failed to abide required disclaimers, failed to disclose contributions and gifts-in-kind, and failed to file in a timely manner. If possible, I recommend that the FEC fine the candidate and his committee to the full extent possible. What Houlihan is doing is making a mockery of this country by acting as though rules do not apply to him. As someone seeking election to the US House of Representatives he should be held to a higher standard and receive the max penalties possible for his flagrant disregard for the sanctity of our elections and his repeated actions.

From,

Matthew G. Rascon,

██████████, California

09/25/2023

2023 OCT -2 AM 11:24

OFFICE OF  
GENERAL COUNSEL

X Matthew G. Rascon

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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

s.s.

Subscribed and sworn to (or affirmed) before me on this 25 day of Sept,

2023, by Matthew E. Rascon

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 4 pages, and dated 9, 25 /2023