



March 1, 2024

MUR 8224

RECEIVED
FEDERAL ELECTION COMMISSION
MARCH 1, 2024 3:28 PM
OFFICE OF GENERAL COUNSEL

Office of General Counsel
Federal Election Commission
1050 First Street, NE
Washington D.C. 20463
Sent via regular US Mail and email at EnfComplaint@fec.gov

Dear Federal Elections Commission:

I am writing with a formal complaint based on my belief that a violation of the federal elections campaign laws and Commission regulations has occurred by The Republicans of Northeast Ohio and its operator, Edward Davidian. As you will see from the attached documents from the Summit County Board of Elections, this committee registered as PAC under the laws of the State of Ohio on January 26, 2024. See attached Exhibit A. The only named responsible party of this PAC is Edward Davidian.

The basis for my complaint is as follows:

Immediately prior to March 1, 2024, The Republicans of Northeast Ohio mailed a public political communication advocating for the election of three federal candidates, President Donald Trump, U.S. Senate Candidate Frank Larose, and U.S. Representative Candidate Chris Banweg, in violation of the Federal Election Campaign Act of 1971 (hereafter "The Act"). See attached Exhibit B. This public political communication was received in the mail by registered Republican voters across Summit County, Ohio on March 1, 2024.

First, The Republicans of Northeast Ohio and Edward Davidian have violated the Act by engaging in federal electioneering because they are not a federal PAC nor a political party. They have "expressly advocated" for the election of three federal candidates because the electoral portion of the communication is unmistakable, unambiguous, and suggestive of only one meaning and reasonable minds could not differ as to whether it encourages actions to elect one or more federal candidates. 11 C.F.R. 100.22; See also 2 U.S.C. 434(c)(1) and 11 C.F.R. 109.10.

Second, under the Act, a public communication, such as a mass mailing, that expressly advocates for the election of a clearly identified candidate that is not authorized by a candidate, an authorized committee or a candidate or its agents, must clearly state the name and permanent address, telephone number or website address of the person who paid for the

communication and state that the communication is not authorized by any candidate or candidate's committee. 2 U.S.C. 441d(a)(3). Further, the Act also requires that the disclaimer be of sufficient type size to be clearly readable and be contained in a printed box set apart from the other content of the communication. Id, 441d(c). This public communication is in clear violation of all of these provisions concerning the required disclaimers.

Accordingly, we ask that this Honorable Committee immediately investigate The Republicans of Northeast Ohio and its responsible party, Edward Davidian, and appropriately find they have engaged in Federal Election Commission violations and sanction them each as may be appropriate.

If any additional information is required, please do not hesitate to contact me. In addition to the contact information contained herein, I can also be reached at corinne@hooverkacyon.com.

Sincerely,



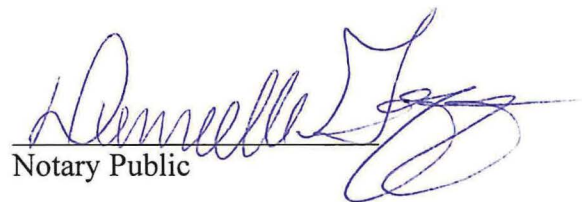
Corinne Hoover Six

Attorney At Law

The above statement was affirmed and sworn to and before me under penalty of perjury by the above-named Corinne Hoover Six this 1 day of March 2024.



Dennelle Goff
Resident Summit County
Notary Public, State of Ohio
My Commission Expires:
August 13, 2024


Notary Public

Not an Original Document



SUMMIT COUNTY
BOARD OF ELECTIONS
AKRON, OH 44311

Designation of Treasurer

Form 30-D

R.C. 3517.10

2024 JAN 26 PM 2:46

ACU 7935

TYPE OF FILING: ☒ NEW ☐ UPDATE
 COMMITTEE TYPE: ☐ Candidate ☒ PAC ☐ PCE ☐ Political Party ☐ Legislative Campaign Fund

If update, please check the appropriate reason(s):

- ☐ Change of Committee Name. Prior Name was: _____
☐ Change of Filing Location. Prior Location was: _____ New Location is: _____
☐ Change of Office Sought. Previous Office Sought: _____ New Office Sought: _____
☐ Change of Treasurer Info ☐ Designation or Change of Deputy Treasurer Info
☐ Change of address/phone/email for: ☐ Committee ☐ Treasurer ☐ Deputy Treasurer ☐ Candidate
☐ Other Please Explain: _____

All Committees

Full Name of Committee The Republicans of Northeast Ohio			PAC # (if Updated)	
Street Address P.O. Box 2668		City STOW	State OH	Zip 44224
Telephone 330-620-5668		Email EHDT77+msn.com		
Treasurer EDWARD DAVIDIAN		Telephone 330 620 5668	Email EHDT77+msn.com	
Street Address 1168 INVERNESS LANE		City STOW	State OH	Zip 44224
Deputy Treasurer (if any)		Telephone	Email	
Street Address		City	State	Zip

Candidate Committees Only

Full Name of Candidate		Email		
Street Address		City	State	Zip
Office Sought	Subdivision/District	Party Affiliation/Independent/Non-Partisan		Election Year

Political Action Committees Only

PAC is sponsored by: <input type="radio"/> Labor Organization <input type="radio"/> Corporation <input checked="" type="radio"/> Not Sponsored	If Sponsored, Name the Sponsor If Ballot Issue PAC, list issue	Acronym Used (if any)
Is this a Ballot Issue PAC <input type="radio"/> Yes <input checked="" type="radio"/> No	PACs and PCEs Only List any Affiliated PACs/PCEs	

Edward Davidian
 Signature of Treasurer or Deputy Treasurer

1/26/2024
 Date (MM/DD/YYYY)

 Signature of Candidate or Authorized Party

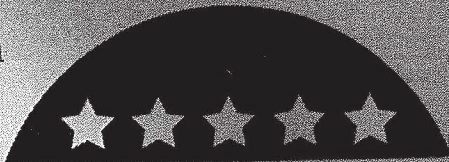
 Date (MM/DD/YYYY)

Exhibit A

Last Updated 09/2019

MUR822400004

VOTE MARCH 19th



**PRESORT STD
US. POSTAGE PAID
CLEVELAND, OH
PERMIT NO. 498**

The REPUBLICANS of Northeast OHIO PAC



**"Be sure to VOTE for these endorsed,
genuine conservative candidates"**



T12 P2
COUGHLIN HOUSEHOLD
OR CURRENT RESIDENT

AKRON OH 44333-1655

VOTE for your REPUBLICAN TEAM

DONALD J TRUMP for President



FRANK LAROSE for US Senate

CHRIS BANWEG for US Congress



DON ROBART

for State Central Committee 27th District

GLORIA RODGERS



**for Summit County Council
District 3**

Bill Roemer, 31st District State Representative
 Mary Stormer, 32nd District State Representative
 Adam Bozic, 34th District State Representative
 Steve Demetriou, 35th District State Representative
 Jennifer Hensal, 9th District Court of Appeals Judge
 John W. Greven, Summit County Prosecutor
 Katie Reed, Summit County Clerk of Courts
 Shane Barker, Summit County Sheriff
 Scott W. Sigel, Summit County Fiscal Officer
 Yulia Gray, Summit County Council District 1
 Cynthia D. Blake, Summit County Council District 5
 Nick Rubino, Summit County Council District 6
 Bethany McKenzie, Summit County Council District 7
 Kyle E. Burke, Summit County Council District 8
 Joseph James Darval, Common Pleas Court Judge
 Susan K. Steinhauer, Common Pleas Court Judge
 Amanda Suffecool, 27th District State Central Committeewoman
 Debbie Walsh, 28th District State Central Committeewoman
 John Leissler, State Senate 28th District

TAKE THIS INFO WITH YOU TO THE POLLS

Pd for by The Republicans of Northeast Ohio PAC