



National Republican Congressional Committee

Donald F. McGahn II
General Counsel

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MUR 5073

August 15, 2000

Lawrence M. Noble, Esq.
General Counsel
Federal Election Commission
999 E Street, NW
Washington, DC 20463

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RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

Re: Complaint Against Susan Davis

Dear Mr. Noble:

The National Republican Congressional Committee, by and through its General Counsel, hereby brings this complaint pursuant to 2 U.S.C. § 437g(a)(1) against Susan Davis. The National Republican Congressional Committee is located at 320 First Street, S.E., Washington, D.C. 20003.

I. VIOLATIONS

Susan Davis is a candidate for U.S. House, specifically the 49th district of California. She is currently the state assemblywoman from that locale, and is not seeking reelection for that office.

Commission regulations prohibit a transfer of assets or funds from a candidate's nonfederal campaign committee to his or her campaign for federal office. 11 C.F.R. § 110.3(d). In violation of this section, Davis has mixed resources from what is left of her non-federal state campaign and her federal campaign.

Even today, Davis continues to use signs and other paraphernalia from her non-federal campaign in support of her federal campaign. As the attached pictures (taken in late April of this year) demonstrate, Davis continues to use her assembly signs and logos in her current effort. Apparently, she has even taken to altering her state campaign signs in an effort to mislead the public. The enclosed yard sign is one such example, where "Assemblywoman" has been obscured by black marker.

320 First Street, S.E.
Washington, D.C. 20003
(202)479-7069
www.nrcc.org

But this matter is not simply about yard signs. Instead, it raises serious questions regarding Davis end-running the federal limits and prohibitions. What other corners has she cut? How else is she subsidizing her campaign? How else is she using prohibited funds? It is time for Davis to be straight with the public, and answer such questions. If she can't be straight with her yard signs, how can the people of the 49th district of California know she is being straight on other matters?

II. CONCLUSION

For the foregoing reasons, the National Republican Congressional Committee respectfully requests that the Federal Election Commission find that there is a reason to believe that a violation of the law has occurred, and investigate the matter promptly.

Respectfully submitted,



Donald F. McGahn II

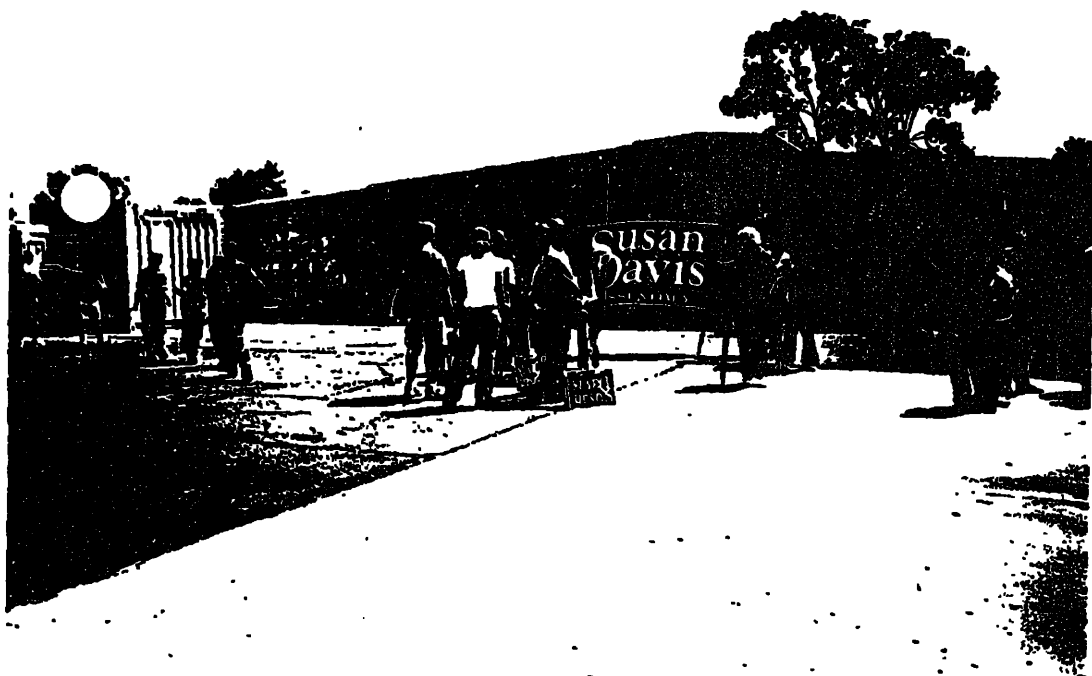
District of Columbia



Signed and sworn to before me
this 15th day of August, 2000

M.D. ACTON
Notary Public, District of Columbia
My Commission Expires July 14, 2004

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PS LIVES STAYS

SECRET

Impact Posters, Inc. 

Susan Davis for 76th AD. ID#940509

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Julius T. Davis

Impact Posters, Inc. 

Susan Davis for 76th A.D. ID#940509

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FEDERAL ELECTION COMMISSION
Washington, DC 20463

SENSITIVE

MEMORANDUM

TO: The Commission

FROM: Office of the Commission Secretary *VH*

DATE: August 24, 2000

SUBJECT: MUR 5073- Complaint

The attached document is being circulated for your information.

Attachments