

COMPLAINT TO FEDERAL ELECTION COMMISSION

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2008 AUG 20 A 9 53

Identification of Respondents:

**Protect Colorado Jobs, Inc.
1799 Pennsylvania Street
Suite 270
Denver, CO 80203**

**John Berry, Esq.
1799 Pennsylvania Ave.
Suite 270
Denver, CO 80203**

MUR # 6056

Curt Cervený

Denver, CO 80203

Protect Colorado Jobs, Inc. ("PCJ") is a non-profit Colorado corporation organized under Section 501(c) (4) of the Internal Revenue Code.

John Berry is Secretary and present Treasurer of PCJ.

Curt Cervený ("Cervený") is the former Treasurer of Protect Colorado Jobs, Inc. and during the time relevant to this complaint was a signatory on Protect Colorado's Jobs' checking account.

Identification of Non-Respondent Parties:

Mike Coffman

Highlands Ranch, CO 80129-5690

Andrew Zuppa

Denver, CO 80229

Mike Coffman ("Coffman") is a candidate for the 6th Congressional District of Colorado.


Andrew Zuppa is associated with PCJ.

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Recital of Facts:

During the last week of July, 2008, approximately three weeks before the Republican primary for the 6th Congressional District, PCJ used corporate funds¹ to pay for an attack mailing against Coffman.² The attack piece was mailed to every Republican voter who requested a primary absentee ballot.³ Cervený signed PCJ's corporate check to pay for the mailing.⁴

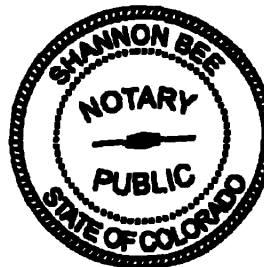

Mike Coffman, Complainant

Highlands Ranch, CO 80129-5690

Under penalty of perjury, the foregoing complaint was signed and sworn to before me this 1st day of August, 2008, by Mike Coffman, Complainant.

My commission expires: 8-19-2012


Shannon Bee
Notary Public



¹ Information and belief based on statements from John Berry and Andrew Zuppa

² Copy of mailing is attached as "Exhibit A"

³ Information and belief based on a sampling of Coffman supporters who received the mailing

⁴ Information and belief based on statements from John Berry and Andrew Zuppa

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"Exhibit A", page one



Call Mike Coffman and ask him to stop increasing his office budgets, comply with immigration laws, and adopt strict office protocols to prevent political influence.

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*****AUTODIGIT 80124 T15 F1
SEAN B TONER
LITTLETON, CO 80126-4726



"Exhibit A", page 2

MIKE COFFMAN: AFTER 20 YEARS IN PUBLIC OFFICE, HE'S TURNED INTO A BIG GOVERNMENT PROFESSIONAL POLITICIAN.

As a professional politician, Mike Coffman has a record of bloated budgets and flawed policy decisions that have lead to a bigger and less efficient government.

As Colorado Treasurer from 1999-2007, Mike Coffman increased his office's budget by a whopping 33%. And in his first two years as Colorado's Secretary of State, Mike Coffman increased the budget for that office by 29%...in just two years!

Unfortunately, those bloated budgets haven't resulted in better policy. In fact, under Mike Coffman, the Secretary of State's office refuses to report its compliance with a 2006 immigration law, saying the law doesn't apply to them.

(See the *Sage Radio Minute*, 5/26/08)

Unfortunately, in the past few years, Coffman's office policies have been called into question by members of both political parties and both Denver newspapers.

Coffman's fellow Republicans and the Democrats called him a flip-flopper who contributed to possible chaos on Election Day.

Rocky Mountain News, May 6, 2006

The chief of staff to Secretary of State Mike Coffman is doing campaign work for Coffman's congressional bid in an apparent breach of ethics according to government watchdog groups.

Rocky Mountain News, March 7, 2006

Secretary of State Mike Coffman has acknowledged that hiring a partisan activist to work in the state's elections division was a "failure of leadership."

Denver Post, May 20, 2007

Coffman has faced other accusations that politics blend with politics in his office. Earlier this month, a state audit found that an elections employee appeared to have broken state law and personnel rules for operating a partisan political business on the side.

Denver Post, December 21, 2007

Coffman has also been called out for not complying with immigration laws, and delaying the implementation of a law that would have required the state to

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