

**BEFORE THE FEDERAL ELECTION COMMISSION**

In the matter of:

Democratic Congressional Campaign Committee  
(Committee ID: C0000935)  
and David Plouffe, Treasurer

Michigan Democratic State Central Committee  
(Committee ID: C00031054)  
and Roger E. Winkelman, Treasurer

Byrum for Congress  
(Committee ID: C00344606)  
and Hilda Curran, Treasurer

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FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL

**COMPLAINT**

NOW COMES the Michigan Republican State Committee by its Chairman, Gerald (Rusty) Hills, (hereinafter referred to as the "MRSC") of 2121 East Grand River, Lansing, Michigan 48912, and hereby files this Complaint pursuant to 2 U.S.C 437 g(a)(1) and 11 C.F.R. 111.4 against Byrum for Congress, Hilda Curran, Treasurer, Democratic Congressional Campaign Committee (hereinafter referred to as the "DCCC"), David Plouffe, Treasurer, and Michigan Democratic State Central Committee (hereinafter referred to as the "MDSCC"), Roger E. Winkelman, Treasurer, and states the following:

1. Dianne Byrum was a Democrat candidate for Congress in the Eighth District of Michigan.
2. Byrum for Congress (Committee ID: C00344606) was the principal campaign committee for Dianne Byrum and is a committee registered with the Federal Election Commission.
3. The DCCC (Committee ID: C0000935) is a committee registered with the Federal Election Commission.
4. The MDSCC (Committee ID: C00031054) is a committee registered with the Federal Election Commission.
5. 2 U.S.C. 441 a(d) and 11 C.F.R. 110.7 governs party committee expenditure limits, including coordinated party expenditures, which are limited expenditures by party committees on behalf of candidates in the general election.
6. According to 2 U.S.C. 441 a(d) and 11 C.F.R. 110.7, and the March 2000 FEC *Record*, in which the 2000 coordinated limits were published, both the DCCC and MDSCC may each coordinate \$33,780 in expenditures with Byrum for Congress. Combined, the DCCC and MDSCC may coordinate a total of \$67,560 in expenditures with Byrum for Congress.

7. In its 30-Day Post Election FEC Report following the General Election on November 7, 2000, the MDSCC posted on pages 1 of Schedule F, two \$45,000 contributions totaling \$90,000 as coordinated contributions with Byrum for Congress.
8. In its October 2000 Monthly FEC report, the DCCC posted on page 34 of Schedule F, a contribution of \$14,350, and on page 37 of Schedule F, a contribution of \$51,521, totaling \$65,871 as coordinated contributions with Byrum for Congress.
9. According to these reports, the MDSCC, DCCC and Byrum for Congress coordinated a total of \$155,871 in expenditures. This exceeded the limit of \$67,560 by \$88,311, in violation of 2 U.S.C. 441 a(d) and 11 C.F.R 110.7

#### **REQUEST FOR RELIEF**

Based on the foregoing, the MRSC respectfully requests that the Federal Election Commission investigate this violation and determine as a matter of law that Byrum for Congress, MDSCC, and DCCC violated the Federal Election Campaign Act and regulations of the Federal Election Commission, including but not limited to, 2 U.S.C. 441 a(d) and 11 C.F.R. 110.7

Further, the MRSC respectfully requests that the Federal Election Commission conduct a thorough review of the reports filed by Byrum for Congress, MDSCC and DCCC in order to discover further violations of the regulations of the Federal Election Commission.

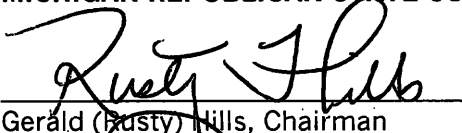
Further, the Complainant respectfully requests the Federal Election Commission to assess all appropriate penalties for said violation in accordance with 2 U.S.C. 437g(a)(5)(A), or any other enforcement provisions of the Act.

The above statements are true and accurate to the best of my knowledge, information and belief.


Respectfully submitted,

**MICHIGAN REPUBLICAN STATE COMMITTEE**

Dated: February 21, 2001

  
Gerald (Rusty) Hills, Chairman

Subscribed and sworn before me this 21<sup>st</sup> day of February 2001.

  
(Notary Public)  
Kent County acting in Ingham County, Michigan  
My commission expires: 6-01-04