

**BEFORE THE
FEDERAL ELECTION COMMISSION**

February 27, 2020

Office of General Counsel
Federal Election Commission
1050 First Street, NE
Washington, DC 20463

COMPLAINT

Complainant files this complaint against Sara Jacobs for Congress and Forward California (the Jacobs SuperPAC), for violations of the Federal Election Campaign Act, as described below.

FACTS/VIOLATIONS

Sara Jacobs is a candidate for Congress in San Diego, California for CA-53. Forward California is a SuperPAC funded with \$1.5 million from Sara Jacobs' grandparents that is funding advertisements on behalf of their granddaughter. Chris Stoddard is a Republican candidate for Congress.

The Jacobs' campaigns are engaged in deceptive advertising to boost Jacobs' Republican opponent, Stoddard, in an underhanded attempt to manipulate the election and deceive San Diegans' into voting for a Republican.

In an attempt to hide their deceptive campaign from public scrutiny and evade federal election rules, it appears certain that either the Jacobs campaign or Jacobs' SuperPAC mailed to San Diego voters advertisements on behalf of the Republican candidate that contain no paid for by disclaimer. (Attachment included below). The Jacobs campaign and Jacobs SuperPAC are the only entities making significant expenditures on behalf of electing Sara Jacobs to Congress.

Any advertisement sent in a congressional campaign must clearly state which committee paid for it and whether the communication was authorized by the candidate (U.S.C 441d).

This is unlikely to be an honest mistake - the Jacobs' campaigns, funded by millions inherited from the Jacobs Qualcomm fortune, have access to the best legal counsel money can buy and the most expensive Washington DC campaign consultants available.

Clearly, the Jacobs' campaigns simply do not want San Diegans to know they are funding advertising on behalf of one of their Republican opponents.

In addition to violating the Federal Election Campaign Act to hide campaign spending and obscure their dirty tactics from the public, there is strong likelihood that these expenditures may have not been properly reported using the required FEC public disclosure reports.

REQUESTED ACTION

As we have shown there is substantial evidence that Respondents have violated the Federal Election Campaign Act. We respectfully request the Commission to investigate these violations and take immediate action if respondents are determined to have violated the FECA.

Sincerely,

Dan Rottenstreich
Gomez Campaign Strategist

Mail Piece Side One:

Where Does Republican Chris Stoddard Stand On Issues Important to You?

- ✓ Veterans
- ✓ Gun Rights
- ✓ Immigration
- ✓ Homelessness
- ✓ Government Spending
- ✓ Health Care
- ✓ Taxes

Get the Facts. Vote for Your Priorities on Tues., March 3

2020 CONGRESSIONAL VOTING GUIDE

PROFIT STD
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019 57363

The mail piece features a portrait of Chris Stoddard on the top right. Below the headline is a list of seven issues, each preceded by a red checkmark. To the left of the list is a circular seal with the word 'LIBERTY' at the top and 'JUSTICE' at the bottom, surrounding a central image of the U.S. Capitol building. At the bottom of the mail piece, there are three small images: a soldier in uniform, a woman and a child, and a landscape with a building. A postage meter stamp is located in the top right corner, and a barcode is visible in the middle right section.

Mail Piece Side Two:

2020 CONGRESSIONAL VOTING GUIDE



Learn the Facts About Republican Chris Stoddard's Stands on Key Issues.



Veterans

A former United States Marine Corps veteran and reserve officer, Chris supports our military. Chris will eliminate the income tax on military retirement pay and has taken an oath to be a strong advocate for veterans and their families.



Gun Rights

Supports the 2nd Amendment and a nationwide concealed carry permit and believes in giving more freedoms to gun owners – not less – and enforcing laws on the books to prevent mass shootings.



Immigration

Supports building the Wall and securing our southern border to help Border Patrol Officers apprehend drug and human traffickers and supports providing more resources to promote legal immigration.



Homelessness

Supports investing in shelters, food, mental health resources and job opportunities to provide long-term solutions to help California's homeless, and outlaw loitering on streets and sidewalks.



Government Spending

Supports "No Budget, No Pay," which requires Congress to have a budget in place or members of Congress don't get paid. Stands behind community service in exchange for a welfare check.



Health Care

Opposes Obamacare and believes families should always have their choice of doctor and insurance plan, and opposes using taxpayer dollars to pay the health care costs of people in the country illegally.



Taxes and the Deficit

Believes we need to get a hold on our growing deficit and rethink the tax code. Someone making \$10,000,000 a year should pay a higher percentage in taxes than someone making \$650,000 per year.

GET THE FACTS. VOTE FOR YOUR CONSERVATIVE PRIORITIES ON TUES., MARCH 3.