

The Complaint of

REPUBLICAN PARTY OF WISCONSIN  
MARK MORGAN,  
148 East Johnson Street  
Madison, WI 53703

Complainant,

Against

VERIFIED  
COMPLAINT

EWERT FOR CONGRESS  
BRIAN EWERT,  
P.O. Box 1017  
Marshfield, WI 54449

Respondent.

---

The Republican Party of Wisconsin, by and through its representative, Mark Morgan (“Complainant”), brings this complaint against Brian Ewert (“Ewert”) and alleges as follows:

1. Complainant Mark Morgan is a qualified elector of the State of Wisconsin and is the Executive Director of the Republican Party of Wisconsin with a mailing address of 148 East Johnson Street, Madison, Wisconsin 53703.
2. Respondent Brian Ewert is a candidate for the United States House of Representatives-Wisconsin District 7, with a mailing address of P.O. Box 1017, Marshfield, WI 54449.
3. Ewert For Congress (“Ewert Campaign”) is a candidate committee authorized by Brian Ewert to make and accept contributions and disbursements in support of Ewert’s campaign for the U.S. House.
4. That on or about July 22, 2018, a political communication advocating for the election of Brian Ewert was distributed by the Ewert Campaign. The literature did not include any disclaimer or attribution identifying the source of communication. (*See* Ewert Communication, attached hereto as Exhibit A).

**Violation of Federal Campaign Finance Law**

5. All of the preceding paragraphs are re-alleged and incorporated as if fully stated herein.
6. Federal campaign finance law is very clear in its requirement that all political communications contain a disclaimer identifying the source of communication.
  - a. Specifically, 11 C.F.R. §110.11(a) requires that “all public communications...made by a political committee” must include disclaimers.
  - b. 11 C.F.R. §110.11(b)(1) further states, “If the communication, including any solicitation, is paid for and authorized by a candidate, an authorized committee of a candidate, or an agent of either of the foregoing, the disclaimer must clearly state that the communication has been paid for by the authorized political committee.”
7. Upon information and belief, the Ewert Campaign violated Federal campaign finance law when it failed to include a disclaimer in above referenced communications as required by 11 C.F.R. §110.11.

The above-referenced activity is sufficient to establish probable cause that Respondent engaged in activities in violation of Section 110.11 of the Code of Federal Regulations and has intentionally acted to circumvent measures that require transparency in the electoral process. To wit, Ewert purchased and distributed political solicitations containing express advocacy to further his campaign for the U.S. House of Representatives without disclosing the source of the communications.

WHEREFORE, Complainant prays that the Federal Elections Commission commence an investigation into the actions of Respondent, impose penalties provided under law, and render any other relief that the Commission may deem just and equitable.

Dated this 26th day of July 2018, at Madison, Wisconsin.



---

Mark Morgan  
Executive Director  
REPUBLICAN PARTY OF WISCONSIN


CERTIFICATION

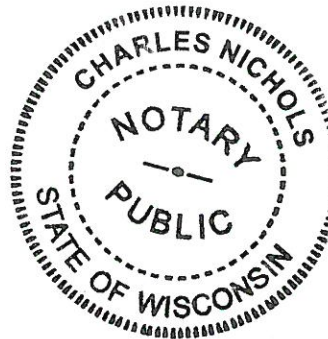
I, Mark Morgan, being first duly sworn upon oath, state that I personally read the above complaint and that the above allegations are true and correct based on my personal knowledge and, as to those allegations stated on information and belief, I believe them to be true.

  
\_\_\_\_\_  
Mark Morgan

State of Wisconsin    )  
                                  ) ss  
County of Dane        )

Sworn to before me this 26 day of July, 2018.

  
\_\_\_\_\_  
Notary Public or Person Authorized  
to Administer Oaths



My commission expires \_\_\_\_\_  
Or,  is permanent.



# Exhibit A

**Brian EWERT**  
**FOR US CONGRESS**  
WI 7TH CONGRESSIONAL DISTRICT

*Count on him!*

**Healthcare**  
Universal healthcare is a right. We need to continue to make healthcare affordable to all. A medical crisis should not cause bankruptcy.

**Government Reform**  
To serve all Americans we must work towards bipartisan solutions. We live in communities, not political parties.

**Taxes**  
Tax reform should be based on fairness and strengthening our communities.

**Roads & Bridges**  
Wisconsin's roads and bridges are aging and need repair. Local businesses are hurt when we fail to invest in these community resources.

**Broadband**  
Without broadband access the people of the 7th district are cut off from the larger economy. Everyone in Northern Wisconsin needs access.

**Ewertforcongress.com**  
PO Box 1017 Marshfield WI 54449

**BRIAN EWERT**

**FOR CONGRESS**

WI 7TH CONGRESSIONAL DISTRICT

*Brian has served his community for 25 years as a doctor in Marshfield. While serving as a doctor, Brian saw not only the struggles his patients endured but also the generosity of a community that took care of each other. It is his belief that the strength of this community should be reflected in Washington. Representing the people of Wisconsin in Congress would be a continuation of a proud lifetime of service.*