

OFFICE OF
GENERAL COUNSEL

2019 DEC 27 AM 6:59

BEFORE THE FEDERAL ELECTION COMMISSION

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MUR 7677COMPLAINT

Steve Chabot for Congress (“the Committee”), through its undersigned Treasurer, hereby submits this Complaint under 52 U.S.C. § 30109(a)(1) against Mr. James Schwartz, Jr. (“Respondent”), the Committee’s former campaign manager. The Committee has reason to believe that Respondent has violated the Federal Election Campaign Act of 1971, as amended (“the Act”), 52 U.S.C. § 30101 *et seq.*, and Federal Election Commission (“FEC” or “Commission”) regulations through an apparent embezzlement scheme and other financial malfeasance in the course of his work for the Committee.

Respondent is under investigation by federal law enforcement after he proffered information to law enforcement about his activities in connection with the Committee.¹ In addition, Respondent’s father, James Schwartz Sr., who was listed on and purportedly electronically signed the Committee’s January 30, 2011 FEC Form 1 (Statement of Organization) as the Committee’s Treasurer,² has released a public statement denying that he ever served as the Committee’s Treasurer.³ Indications are that Mr. Schwartz Sr. was listed as the Committee’s Treasurer as part of Respondent’s apparent scheme.

¹ See, e.g., Jennifer Edwards Baker, *Grand jury convened amid federal investigation into money missing from Chabot campaign*, Fox19Now.com (Dec. 11, 2019), <https://www.fox19.com/2019/12/11/grand-jury-convened-amid-federal-investigation-into-chabot-campaign-finances/>; Sabrina Eaton, *Authorities Investigating Money Missing from Ohio Congressman Steve Chabot’s campaign*, Cleveland.com, (Sept. 4, 2019), <https://www.cleveland.com/open/2019/09/authorities-investigating-money-missing-from-ohio-congressman-steve-chabots-campaign.html>.

² FEC Form 1 (Jan. 30, 2011), <https://docquery.fec.gov/pdf/056/11930249056/11930249056.pdf>.

³ See, e.g., Walter Smith-Randolph, *Chabot campaign aide goes silent amid investigation*, WKRC Local 12 (Sept. 13, 2019), <https://local12.com/news/local/chabot-campaign-aide-goes-silent-amid-investigation>.

The Committee's review of records available to it has indicated several financial irregularities believed to have been caused by Respondent's apparent malfeasance. These irregularities include unreported contributions and disbursements to consulting firms associated with Respondent that appear not to have been authorized. The full extent of Respondent's apparent scheme is unknown at this time, but the Committee believes that Respondent may have misappropriated at least \$300,000. This amount may change pending the outcome of the ongoing law-enforcement investigation and a Committee internal review. These investigations likely will yield additional information and this Complaint will be amended once more facts are known.

Although much information surrounding Respondent's apparent malfeasance is unknown to the Committee at this time, the information presently available provides the FEC reason to believe that Respondent has violated the Act and FEC regulations. Should the Commission eventually determine that Respondent has violated the Act through his apparent activities, the Committee requests that Respondent be enjoined from further violations and fined the maximum amount under law.

Dated: December 16, 2019

Respectfully submitted,



Natalie Baur
Treasurer
Chabot for Congress
9856 Archer Ln.
Dublin, OH 43017-8914

SUBSCRIBED AND SWORN to before me this 16th day of December, 2019.

Lauren Carney
Notary Public

My Commission Expires:

12/18/2019

