

Iowa Ethics and Campaign Disclosure Board  
510 E 12<sup>th</sup>, Ste 1A Des Moines, IA 50319

Fax: 515-281-4073

Complaint Form

Iowa Code Section 68B.32B

RE: Jim Mowrer

Name of the subject of the complaint

Address, if known:

4500 Carpenter Ave

Subject's Street Address/Apt Number

Des Moines, Iowa 50310

City, State, Zip Code, Telephone Number if available

BY: William R. Gustoff

Name of Complainant (person filing the complaint)

Complainant's Address:

521 East Locust St., Suite 302

Street Address/Apt Number

Des Moines, IA 50309, Phone: (515) 868-0211

City, State, Zip Code, Telephone Number

COMPLETE THE FOLLOWING SECTION OR ATTACH A SEPARATE DOCUMENT CONTAINING THE  
REQUISITE INFORMATION:

I, William R. Gustoff hereby complain that Jim Mowrer

Name of Complainant

Subject of Complaint

has committed an act or acts that violate the provisions of Iowa Code Chapter 68A (campaign finance), Chapter 68B (Executive Branch ethics & lobbying) or the Board's administrative rules in that on or about:

August 7, 2017, and continuing violates Iowa Code section 68A.303(5)

List date(s) on which conduct or action(s) took place

the subject of the complaint did the following (recite facts and actions taken that are believed to violate Chapter 68A, Chapter 68B or Administrative Rules adopted by the Board. Please cite the code or rule provision you allege has been violated.) If the space provided is inadequate, please attach additional sheet(s) to this form:

2018 MAY 22 AM 9:43

FILED IN CASE 18-00000

Iowa Code section 68A.303(5) states in pertinent part: "A candidate for statewide or legislative office shall not establish, direct, or maintain a political committee."

Jim Mowrer is a candidate for "statewide office" as evidenced by the Statement of Organization filed in August of 2017 with the IECDB for the office of Secretary of State.

The Majority Rules is a federal PAC registered with the FEC as evidenced by the Statement of Organization filed on November 21, 2016.

Jim Mowrer is listed as the "Treasurer" of the PAC and the PAC also makes expenditures to "JDM Consulting" a company listed as the same mailing address as Jim Mowrer. The PAC also reported making a \$1,500 campaign contribution to "Jim Mowrer for Iowa" on January 2, 2018. This information is found on campaign disclosure reports filed by The Majority Rules (Committee ID: C00629063)

Apart from the unseemly situation of a Treasurer of a PAC making expenditures to his own consulting company as well as his own campaign committee for public office, it is clear that Jim Mowrer has "established, directed, or maintained a political committee" in violation of the express language of Iowa Code section 68A.303(5).

As such, IECDB should fully investigate this matter, and if a violation is found, impose all appropriate sanctions and penalties on Jim Mowrer.

Names and addresses of persons other than yourself who are or may be witnesses to the above described activities:

Public documents filed with IECDB and FEC

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Documents or other sources of information that relate to or are proof of the violation(s). Attach copies of documents to this form if available:

Statement of Organization filed by James Mowrer on August 7, 2017. Statement of Organization filed by The Majority Rules on November 21, 2016.

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## CERTIFICATION BY COMPLAINANT

Required by Iowa Code section 68B.32B(1)

I certify under penalty of perjury pursuant to the laws of the state of Iowa that the preceding statements are true and correct to the best of my knowledge.

May 22, 2018

Date

  
Signature of Complainant

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### \*FOR OFFICE USE ONLY\*

This Complaint has been reviewed by me pursuant to the provisions of Iowa Code section 68B.32B(4). My evaluation of the Complaint to the Board Chairperson is that it:

is legally sufficient       is not legally sufficient.

An evaluation that the complaint is legally sufficient signifies that the complaint has been accepted within the meaning of section 68B.32B(4). Notification to the subject of the complaint is normally made within three working days after this acceptance. Final determination as to whether the complaint is legally sufficient and should be investigated is made by the full Board.

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Date

Board Legal Counsel

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H:/general/office/forms/formal complaint.doc