



January 10, 2023

Corey Amundson, Esq.
Chief, Public Integrity Section
U.S. Department of Justice
1301 New York Avenue, 10th Floor
Washington, DC 20005

Dear Mr. Amundson:

As detailed in the attached complaint, filed January 9, 2023, with the Federal Election Commission (“FEC”), Campaign Legal Center has reason to believe — based on published reports, FEC records, and documents filed with the U.S. House of Representatives — that Congressman George Santos; his federal campaign committee, Devolder-Santos for Congress; the campaign’s treasurer, Nancy Marks; Devolder Organization, LLC; and other unknown persons knowingly and willfully violated multiple provisions of the Federal Election Campaign Act of 1971, as amended (“FECA”), 52 U.S.C. § 30101, *et seq.*

Specifically, Campaign Legal Center has reason to believe that, with knowing and willful intent, unknown persons made, and Congressman Santos acted as a straw donor for, illegal contributions totaling \$705,000 to Devolder-Santos for Congress, which Devolder-Santos for Congress knowingly accepted, all in violation of 52 U.S.C. § 30122. It appears that Devolder Organization, LLC may have been a conduit for these illegal contributions. Further, there is reason to believe the true, obscured contributors knowingly and willfully made, and Devolder-Santos for Congress accepted, either excessive contributions or otherwise prohibited contributions, in violation of 52 U.S.C. §§ 30116(a)(1)(A) and 30118(a), among other potential statutes.

While investigating the felonious straw-donor scheme, the Department of Justice may also wish to examine potential violations involving Congressman Santos’s campaign spending. Campaign Legal Center has reason to believe that, with knowing and willful intent, Congressman Santos, Ms. Marks, and Devolder-Santos for Congress falsely reported at least 40 campaign expenditures totaling approximately \$8,000, in violation of 52 U.S.C. § 30104(b). Similarly, Campaign Legal Center has reason to believe that, with knowing and willful intent,

Congressman Santos and Devolder-Santos for Congress converted at least \$13,500 of campaign funds to personal use by paying rent on Congressman Santos's personal residence, in violation of 52 U.S.C. § 30114(b).

We are writing to urge the Department of Justice to exercise its authority to conduct criminal investigations of these potential violations of federal law and, if warranted, to bring criminal proceedings to enforce federal campaign finances laws as they apply to the respondents named in the complaint.

Although the FEC has exclusive jurisdiction over civil enforcement of FECA, the Department of Justice has its own independent and exclusive jurisdiction to bring criminal enforcement proceedings for violations of these laws. Specifically, FECA provides for criminal sanctions, enforced by the Department of Justice, in the case of "knowing and willful" violations of FECA that exceed specified monetary thresholds, which vary according to the specific statutory provision violated. *See* 52 U.S.C. § 30109(d).¹

The Department of Justice is responsible for ensuring that potential knowing and willful violations of FECA are investigated and that actual knowing and willful violations are prosecuted and punished. The integrity of U.S. elections depends on it.

Sincerely,

/s/ Saurav Ghosh
Campaign Legal Center, by
Saurav Ghosh
1101 14th St. NW, Suite 400
Washington, DC 20005

Encl.

¹ As explained in the Department of Justice handbook *FEDERAL PROSECUTION OF ELECTION OFFENSES* 12-14 (8th ed. 2017):

In general, violations of FECA become crimes when they satisfy a monetary threshold and are committed with specific intent. Non-criminal FECA violations are subject to the exclusive jurisdiction of the FEC.

....

The Department interprets the significant enhancements to FECA's criminal penalties enacted in 2002 as reflecting a clear congressional intent that all knowing and willful violations involving sums aggregating above the statutory minimums for FECA crimes be considered for prosecution.

BEFORE THE FEDERAL ELECTION COMMISSION

CAMPAIGN LEGAL CENTER
1101 14th Street NW, Suite 400
Washington, DC 20005

ROGER G. WIEAND
1101 14th Street NW, Suite 400
Washington, DC 20005

v. MUR No. _____

GEORGE ANTHONY DEVOLDER-SANTOS
9002 Queens Blvd.
Elmhurst, NY 11373

DEVOLDER-SANTOS FOR CONGRESS
and NANCY MARKS in her official capacity
as treasurer
47 Flintlock Dr.
Shirley, NY 11967

NANCY MARKS in her personal capacity
47 Flintlock Dr.
Shirley, NY 11967

DEVOLDER ORGANIZATION, LLC
801 Del Rio Way, #602
Merritt Island, FL 32953

UNKNOWN PERSONS
that made contributions to Devolder-Santos
for Congress in the name of George Anthony
Devolder-Santos

COMPLAINT

1. George Santos, who was recently elected to represent New York's Third Congressional District, actively deceived the public throughout the 2022 election by fabricating virtually every aspect of his life — including basic, verifiable facts about the schools he attended and degrees he attained, his employment history, his ownership of multiple real estate

properties, his religion, and even his ancestry and racial identity.¹ Santos is also wanted in Brazil for using stolen checks to make fraudulent purchases in 2008 — a crime for which he was charged by Brazilian authorities and to which he reportedly confessed in 2010.² As part of his latest campaign of duplicity, Santos also appears to have violated federal campaign finance laws by knowingly and willfully concealing the true sources of his campaign’s funding, misrepresenting how his campaign spent its money, and illegally paying for personal expenses with campaign funds. Particularly in light of Santos’s mountain of lies about his life and qualifications for office, the Commission should thoroughly investigate what appear to be equally brazen lies about how his campaign raised and spent money.

2. Santos purported to loan his campaign \$705,000 during the 2022 election.³ But it is far from clear how he could have done so with his own funds, because financial disclosure reports indicate that Santos had only \$55,000 to his name in 2020,⁴ and his claims of having earned millions of dollars in 2021 and 2022 from a supposed consulting business that he started in May 2021, Devolder Organization LLC (“Devolder LLC”), are vague, uncorroborated, and non-credible in light of his many previous lies.⁵ As set forth below, the overall circumstances instead indicate that unknown individuals or corporations may

¹ Grace Ashford and Michael Gold, *Who Is Rep.-Elect George Santos? His Résumé May Be Largely Fiction*, N.Y. TIMES (Dec. 19, 2022), <https://www.nytimes.com/2022/12/19/nyregion/george-santos-ny-republicans.html>.

² *Id.*

³ Devolder-Santos for Congress, Financial Summary, 2021-2022, <https://www.fec.gov/data/committee/C00721365/> (last visited Jan. 6, 2023).

⁴ George Anthony Devolder-Santos, Annual Report for Calendar Year 2020 Amendment, Clerk of the House of Representatives (May 11, 2020), https://disclosures-clerk.house.gov/public_disc/financial-pdfs/2020/10035761.pdf (“Santos 2020 Financial Disclosure Report”).

⁵ See George Anthony Devolder-Santos, Annual Report for Calendar Year 2022, Clerk of the House of Representatives (Sept. 6, 2022), https://disclosures-clerk.house.gov/public_disc/financial-pdfs/2022/10050385.pdf (“Santos 2022 Financial Disclosure Report”).

have illegally funneled money to Santos’s campaign through the newly formed Devolder LLC.

3. In addition, Santos’s campaign appears to have routinely falsified its disclosure of disbursements. The campaign reported an astounding 40 disbursements between \$199 and \$200, including 37 disbursements of *exactly* \$199.99.⁶ The sheer number of these just-under-\$200 disbursements is implausible, and some payments appear to be impossible given the nature of the item or service covered. Accordingly, there is reason to believe Santos’s campaign deliberately falsified its disbursement reporting, among numerous other reporting violations.
4. Moreover, some of the reported disbursements made by Santos’s campaign appear to violate federal laws prohibiting the conversion of campaign funds to personal use, including disbursements to pay rent on a candidate’s personal residence.
5. This complaint is filed pursuant to 52 U.S.C. § 30109(a)(1) and is based on information and belief that respondents violated the Federal Election Campaign Act (“FECA”), 52 U.S.C. § 30101, *et seq.* “If the Commission, upon receiving a complaint . . . has reason to believe that a person has committed, or is about to commit, a violation of [FECA] . . . [t]he Commission *shall make an investigation* of such alleged violation.”⁷

FACTUAL BACKGROUND

6. Devolder-Santos for Congress (the “Santos campaign”) is the principal campaign committee of George Anthony Devolder-Santos (“Santos”), a candidate for the U.S.

⁶ Devolder-Santos for Congress, Disbursements between \$199 and \$200, 2019-2020, https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00721365&two_year_transaction_period=2022&min_date=01%2F01%2F2021&max_date=12%2F31%2F2022&min_amount=199&max_amount=200 (last visited Jan. 6, 2023).

⁷ 52 U.S.C. § 30109(a)(2) (emphasis added); *see also* 11 C.F.R. § 111.4(a).

House of Representatives in New York’s Third Congressional District during the 2020 and 2022 election cycles, who won his election in November 2022. The Santos campaign first registered with the Commission on October 2, 2019, with Nancy Marks as its treasurer.⁸

7. In his initial personal financial disclosure filing with the House of Representatives on May 11, 2020, Santos reported only one source of income, a \$5,000 “Commission Bonus” paid by “LinkBridge Investors.”⁹ In an amendment filed that same day, Santos reported an additional \$55,000 in earned income from “LinkBridge Investors,” in “Salary, Commission and Bonus.”¹⁰
8. Santos’s self-reported financial situation had changed dramatically two years later. In his September 6, 2022 financial disclosure report, Santos reported that he was now a Managing Principal at the Devolder Organization (presumably referring to Devolder LLC), a New York-based “capital intro consulting company” — a type of company that a *New York Times* report described as “a boutique firm that serves as a liaison between investment funds and deep-pocketed investors”¹¹ — in which he held a 100% interest, earning between \$1,000,001 and \$5,000,000 in the preceding year (2021) and year of filing (2022). Santos reported that the value of the Devolder LLC itself was between \$1,000,001 and \$5,000,000. Santos also stated that he had between \$1,000,001 and \$5,000,000 in a “saving account” [sic], between \$100,001 and \$250,000 in a checking

⁸ Devolder-Santos for Congress, Statement of Org. (Oct. 2, 2019).

⁹ George Anthony Devolder-Santos, Annual Report for Calendar Year 2020, Clerk of the House of Representatives (May 11, 2020), https://disclosures-clerk.house.gov/public_disc/financial-pdfs/2020/10035760.pdf.

¹⁰ Santos 2020 Financial Disclosure Report.

¹¹ Ashford and Gold, N.Y. TIMES, *supra*.

account, and between \$500,001 and \$1,000,000 in asset value for an apartment in Rio de Janeiro, Brazil.¹²

9. Santos did not report that any client paid him more than \$5,000 for his personal services, as required by disclosure rules issued by the House of Representatives' Committee on Ethics.¹³
10. Santos has made multiple conflicting statements regarding the business purpose and ownership of Devolder LLC, which incorporated in Florida on May 11, 2021.¹⁴ Devolder LLC's tax election status for federal tax purposes is not known. On his campaign website, he had described the "Devolder Organizations" as "his family's firm," and his role "as a Managing Member where he oversees the asset allocations of the 80MM AUM," despite his earlier statement indicating his 100% interest in the Organization.¹⁵
11. In a December 2022 interview, responding to numerous news reports of Santos's many fabrications regarding his background, Santos offered an explanation of Devolder LLC's business that differed substantially from his earlier accounts:

Santos said that Devolder was also in the capital introduction business, including "deal building" and "specialty consulting" for "high net worth individuals." As an example of his work, he said a client might want to sell a plane or a boat. "I'm not going to go list it and broker it," he said. "What I will do is I will go look out there within my Rolodex and be like: 'Hey, are you looking for a plane?' 'Are you looking for a boat?' I just put that feeler out there." He said he had a network of wealthy investors, family offices,

¹² Santos 2022 Financial Disclosure Report.

¹³ *Id.*; see U.S. House of Rep., Comm. on Ethics, Instruction Guide: Financial Disclosure Statements and Periodic Transaction Reports at 39-40 (2021) <https://ethics.house.gov/sites/ethics.house.gov/files/documents/FINAL%202021%20FD%20Instructions.pdf> ("House Financial Disclosure Rules") (stating that a person with an ownership interest in their employer (such as a 100% owner, as Santos purports to be for Devolder LLC), who personally performs services that earn a fee in excess of \$5,000 from a client, must report such clients); see also Ashford and Gold, N.Y. TIMES, *supra* (commenting on the oddity of the missing client information).

¹⁴ Devolder Organization LLC, Articles of Org. for Florida Limited Liability Company, FLORIDA DEPT. OF STATE, DIV. OF CORPS. (May 11, 2021) (attached as Exhibit A.)

¹⁵ George Santos for Congress, About, <https://web.archive.org/web/20211021044924/https://georgefornny.com/about/> (captured Oct. 21, 2021) (last visited Jan. 5, 2023).

“institutions” and endowments that included about 15,000 people. Within the first six months of starting Devolder, he said he “landed a couple of million-dollar contracts.” “If you’re looking at a \$20 million yacht, my referral fee there can be anywhere between \$200,000 and \$400,000,” he said. Santos did not respond to follow-up questions asking what the million-dollar contracts entailed, or if he could share the names of previous clients from his business.¹⁶

12. There is scant additional information to substantiate or corroborate Santos’s account of his work through Devolder LLC, and some information even appears to contradict that account. Florida corporate records indicate that Devolder LLC was listed as one of several organizations “authorized to manage and control” Red Strategies USA, LLC (“Red Strategies”), a company that shares the same principal address as Devolder LLC¹⁷ and, according to FEC disclosure reports, provided “digital consulting and fundraising services” for a single political committee, Tina Forte for Congress, which paid Red Strategies \$110,320.05 during the 2022 election cycle.¹⁸
13. Santos loaned his campaign a substantial amount of money during the 2022 election cycle, and both the loans and his successful bid for Congress were essentially contemporaneous with the formation and sudden success of Devolder LLC. Santos declared his federal candidacy for the 2022 election on April 17, 2021.¹⁹ He incorporated Devolder LLC in Florida three weeks later, on May 11, 2021.²⁰ On June 30, 2021, about six weeks after Devolder LLC’s formation, Santos loaned his campaign \$80,000.²¹

¹⁶ Kadia Goba, *George Santos Tries to Explain His Wealth*, SEMAFOR (Dec. 28, 2022), <https://www.semafor.com/article/12/28/2022/george-santos-tries-to-explain-his-wealth>.

¹⁷ Red Strategies USA, LLC, Articles of Org. for Florida Limited Liability Company, FLORIDA DEPT. OF STATE, DIV. OF CORPS. (May 4, 2021) (attached as Exhibit B).

¹⁸ Disbursements to “Red Strategies,” https://www.fec.gov/data/disbursements/?data_type=processed&recipient_name=Red+Strategies+USA (last visited Jan. 5, 2023).

¹⁹ Devolder-Santos for Congress, Statement of Candidacy (Apr. 17, 2021) (“Santos Statement of Candidacy”).

²⁰ See Exhibit A.

²¹ Devolder-Santos for Congress, Amend. July 2021 Quarterly Report at 122 (Sept. 12, 2022).

14. During his first campaign for New York’s Third Congressional District during the 2020 election cycle, Santos had reported loaning his campaign committee a total of \$81,250 (more than his reported income at the time). During the 2022 election cycle, Santos reported loaning his committee a further \$705,000. The chart below summarizes all of Santos’s reported personal loans to his principal campaign committee:²²

Loan Date	Loan Amount
12/31/2019	\$5,300
1/3/2020	\$18,550
1/10/2020	\$4,200
3/10/2020	\$2,000
3/31/2020	\$50,000
6/25/2020	\$1,200
2020 Cycle Total	\$81,250
6/30/2021	\$80,000
3/31/2022	\$500,000
10/26/2022	\$125,000
2022 Cycle Total	\$705,000
GRAND TOTAL	\$786,250

15. During the 2022 election cycle, the Santos campaign reported 40 disbursements between \$199 and \$200,²³ including 37 disbursements of *exactly* \$199.99 — a penny below the \$200 threshold at which the committee would be required by Commission regulations to retain a receipt, invoice, or canceled check. In fact, after excluding earmarked contributions and contribution refunds, the Santos campaign reported approximately as many disbursements of \$199.99 (37 of 75) as *all* other committees combined. The Santos

²² Devolder-Santos for Congress, Loans from “Santos,” https://www.fec.gov/data/loans/?committee_id=C00721365&loan_source_name=santos (last visited Jan. 5, 2023) (note that multiple duplicate entries appear to be erroneous data entry artifacts).

²³ See List of Disbursements by Devolder-Santos for Congress Between \$199 and \$199.99 (attached as Exhibit C).

- campaign reported that it had spent exactly \$199.99 on numerous occasions at the same vendor. For instance, it claimed to have spent exactly \$199.99 on 7 disbursements to Il Bacco Ristorante of Little Neck, NY; 5 separate occasions with Uber; 4 separate occasions with Delta Airlines; and 3 separate occasions at Best Buy.²⁴
16. Moreover, for several specific transactions, it appears virtually impossible that the Santos campaign's disbursement was actually for the stated amount. The Santos campaign reported making a \$199.99 disbursement to the W Hotel South Beach of Miami, Florida on October 13, 2021, for "Hotel Stay,"²⁵ but the least expensive room available for a midweek stay in October — a one-night, one-room stay for one adult — is priced at more than \$700.²⁶
17. The Santos campaign also reported a \$199.99 disbursement to CLEAR for "Travel,"²⁷ but CLEAR stated in an email that its non-discounted standard annual membership is \$189.²⁸
18. The Santos campaign reported a \$199.99 disbursement to JFK Parking,²⁹ but there is no combination of fees from that airport parking facility that would end in \$.99.³⁰
19. The Santos campaign reported making five disbursements to "Cleaner 123 Inc." totaling \$10,900, with each disbursement described as "Apartment Rental for Staff," "Rent," or

²⁴ See List of All 2021-2022 Disbursements Reported to the Commission of \$199.99 (attached as Exhibit D).

²⁵ Devolder-Santos for Congress, Amend. 2022 January Year-End Report at 165 (Sept. 12, 2022).

²⁶ W South Beach, Marriott Find and Reserve, <https://www.marriott.com/reservation/rateListMenu.mi?defaultTab=prepay&showFullPrice=true> (last visited Jan. 5, 2023) (screenshot attached as Exhibit E).

²⁷ Devolder-Santos for Congress, Amend. 2022 Year-End Report at 94 (Sept. 12, 2022).

²⁸ E-mail from CLEAR Member Care to Roger G. Wieand (Jan. 4, 2023) (attached as Exhibit F).

²⁹ Devolder-Santos for Congress, Amend. 2022 Year-End Report at 122. (Sept. 12, 2022).

³⁰ John F. Kennedy International Airport, Parking – JFK, <https://www.jfkairport.com/to-from-airport/parking> (last visited Jan. 5, 2023) ("JFK Parking Rates").

“Rent & Rent Deposit,” and another disbursement of \$2,600 to “Russell Levinson” for “Apartment Rental for Staff,” as set forth in the table below:³¹

Date	Recipient	Description	Amount	Address
5/10/2022	LEVINSON, RUSSELL	APARTMENT RENTAL FOR STAFF	\$2,600	18 Juniper Place, Huntington, NY 11743
6/3/2022	CLEANER 123 INC	APARTMENT RENTAL FOR STAFF	\$2,000	18 Juniper Place, Huntington, NY 11743
7/5/2022	CLEANER 123 INC	RENT & RENT DEPOSIT	\$1,600	18 Juniper Place, Huntington, NY 11743
7/5/2022	CLEANER 123 INC	RENT	\$1,000	18 Juniper Place, Huntington, NY 11743
8/4/2022	CLEANER 123 INC	APARTMENT RENTAL FOR STAFF	\$2,800	18 Juniper Place, Huntington, NY 11743
9/6/2022	CLEANER 123 INC	APARTMENT RENTAL FOR STAFF	\$3,500	18 Juniper Place, Huntington, NY 11743
Total Expenditures			\$13,500	

20. Contrary to the reported purposes for these expenditures, however, a *New York Times* report indicates that Santos lived at the “18 Juniper Place” address. According to the report, these expenditures “gave the address of a modest suburban house on Long Island. But one neighbor said Santos himself had been living there for months, and two others said that they had seen Santos and his husband coming and going.”³²

SUMMARY OF THE LAW

Contributions in the Name of Another

21. FECA provides that “[n]o person shall make a contribution in the name of another person or knowingly permit his name to be used to effect such a contribution, and no person shall knowingly accept a contribution made by one person in the name of another person.”³³

³¹ Devolder-Santos for Congress, Amend. 2022 July Quarterly Report at 149, 168 (Sept. 12, 2022); Devolder-Santos for Congress, Amend. 2022 Pre-Primary Election Report at 60 (Sept. 12, 2022); Devolder-Santos for Congress, Amend. 2022 October Quarterly Report at 196-97 (Oct. 24, 2022).

³² Grace Ashford and Dana Rubinstein, *Santos, a Suburban House and \$11,000 in Campaign Payments for ‘Rent,’* N.Y. TIMES (Dec. 29, 2022), <https://www.nytimes.com/2022/12/29/nyregion/george-santos-campaign-finance.html>.

³³ 52 U.S.C. § 30122.

22. The Commission regulation implementing the statutory prohibition provides the following examples of contributions in the name of another:
- a. “Giving money or anything of value, all or part of which was provided to the contributor by another person (the true contributor) without disclosing the source of money or the thing of value to the recipient candidate or committee at the time the contribution is made.”
 - b. “Making a contribution of money or anything of value and attributing as the source of the money or thing of value another person when in fact the contributor is the source.”³⁴
23. The requirement that a contribution be made in the name of its true source promotes Congress’s objective of ensuring the complete and accurate disclosure by candidates and committees of the political contributions they receive,³⁵ and ensures that the public and complainants are fully informed about the true sources of political contributions and expenditures. Such transparency also enables voters, including complainant Wieand, to have the information necessary to evaluate candidates for office, “make informed decisions[,] and give proper weight to different speakers and messages.”³⁶
24. FECA and Commission regulations provide that a person who furnishes another with funds for the purpose of contributing to a candidate or committee “makes” the resulting contribution, whether funds are advanced to another person to make a contribution in that

³⁴ 11 C.F.R. § 110.4(b)(2)(i)-(ii).

³⁵ *United States v. O’Donnell*, 608 F.3d 546, 553 (9th Cir. 2010) (“[T]he congressional purpose behind [Section 30122]—to ensure the complete and accurate disclosure of the contributors who finance federal elections—is plain.”); *Mariani v. United States*, 212 F.3d 761, 775 (3d Cir. 2000) (rejecting constitutional challenge to section 30122 in light of the compelling governmental interest in disclosure).

³⁶ *Citizens United v. FEC*, 558 U.S. 310, 369-71 (2010).

person’s name or promised as reimbursement of a solicited contribution.³⁷ Moreover, the “key issue . . . is the source of the funds” and, therefore, the legal status of the funds when conveyed from a conduit to the ultimate recipient is “irrelevant to a determination of who ‘made’ the contribution for the purposes of [Section 30122].”³⁸

25. Straw donor contributions like those alleged here are serious violations of federal campaign finance law that have led to criminal indictments and convictions in recent years.³⁹ As explained in one such indictment, the straw donor ban works in tandem with other campaign finance laws to protect the integrity of our electoral system and to ensure that all candidates, campaign committees, federal regulators, and the public are informed of the true sources of money spent to influence federal elections.⁴⁰ Another recent indictment highlighted how straw donor schemes have been used to skirt FECA’s source prohibitions, such as the ban on contributions by government contractors.⁴¹
26. Even for contributions that would otherwise be legal — *i.e.*, contributions that would not be prohibited or excessive, if made in the true contributor’s own name — the prohibition

³⁷ See *United States v. Boender*, 649 F.3d 650, 660 (7th Cir. 2011) (holding that to determine who made a contribution “we consider the giver to be the source of the gift, not any intermediary who simply conveys the gift from the donor to the donee.”); *O’Donnell*, 608 F.3d at 550, 555.

³⁸ *United States v. Whittemore*, 776 F.3d 1074, 1080 (9th Cir. 2015) (holding that defendant’s “unconditional gifts” to relatives and employees, along with the suggestion they contribute the funds to a specific political committee, violated Section 30122 because the source of the funds remained the individual who provided them to the putative contributors).

³⁹ See Colin Moynihan, *Lev Parnas, Ex-Giuliani Ally, Is Convicted of Campaign Finance Charges*, N.Y. TIMES (Oct. 22, 2021), <https://www.nytimes.com/2021/10/22/nyregion/lev-parnas-guilty-giuliani.html>; Dep’t of Justice, *Lev Parnas and Igor Fruman Charged with Conspiring to Violate Straw and Foreign Donor Bans* (Oct. 10, 2019), <https://www.justice.gov/usao-sdny/pr/lev-parnas-and-igor-fruman-charged-conspiring-violate-straw-and-foreign-donor-bans>; Dep’t of Justice, *Entertainer/Businessman and Malaysian Financier Indicted for Conspiring to Make and Conceal Foreign and Conduit Contributions During 2012 U.S. Presidential Election* (May 10, 2019), <https://www.justice.gov/opa/pr/entertainerbusinessman-and-malaysian-financier-indicted-conspiring-make-and-conceal-foreign>.

⁴⁰ Grand Jury Indictment, *United States v. Lev Parnas, et al.*, Cr. No. 19-725 (S.D.N.Y. Oct. 10, 2019), <https://www.justice.gov/usao-sdny/press-release/file/1208281/download>.

⁴¹ Dep’t of Justice, *Former Government Contractor Executives Indicted for Unlawful Campaign Contributions* (Feb. 10, 2022), <https://www.justice.gov/opa/pr/former-government-contractor-executives-indicted-unlawful-campaign-contributions>.

of contributions in the name of another serves FECA's core transparency purposes by ensuring that voters have access to complete and accurate information regarding the sources of electoral contributions.

Excessive and/or Prohibited Contributions

27. FECA prohibits any "person" from making aggregate contributions in excess of a specified amount, currently \$2,900 per election, to any candidate and his or her authorized campaign committee.⁴² FECA further prohibits all candidates and political committees from knowingly accepting any contributions in violation of the relevant contribution limits.⁴³
28. Moreover, FECA prohibits corporations from making contributions to candidates and their authorized campaign committees, and prohibits candidates and their authorized campaign committees from knowingly accepting or receiving any such prohibited corporate contributions.⁴⁴ Under Commission regulations, an LLC that elects to be taxed as a corporation is treated as a corporation.⁴⁵
29. Additionally, FECA prohibits foreign nationals from directly or indirectly making "a contribution or donation of money or other thing of value . . . in connection with a Federal, State, or local election" or "an expenditure, independent expenditure, or disbursement for an electioneering communication."⁴⁶ FECA further prohibits any person from soliciting, accepting, or receiving a foreign national contribution.⁴⁷

⁴² 52 U.S.C. § 30116(a)(1)(A).

⁴³ *Id.* § 30116(f).

⁴⁴ *Id.* § 30118(a); *see* 11 C.F.R. § 114.2(b), (d).

⁴⁵ 11 C.F.R. § 110.1(g)(3).

⁴⁶ 52 U.S.C. § 30121(a)(1).

⁴⁷ *Id.* § 30121(b).

Disbursement Reporting and Recordkeeping

30. FECA mandates that all political committees, including a candidate's authorized campaign committee, must file periodic disclosure reports with the Commission that accurately and completely disclose, among other things, the total disbursements made by the committee, and, in addition, the name and address of any person receiving disbursements aggregating in excess of \$200 in an election cycle.⁴⁸
31. Under Commission regulations, when itemizing a disbursement, authorized campaign committees must provide the "date, amount and purpose of each expenditure," and the "purpose" must include a "brief statement or description of why the disbursement was made."⁴⁹
32. FECA and Commission regulations require that the treasurer of a political committee keep accurate records of all disbursements made by the committee, "including a receipt, invoice, or cancelled check for each disbursement in excess of \$200."⁵⁰ The Commission may hold a treasurer personally liable for violating legal obligations imposed specifically on committee treasurers, such as recordkeeping and reporting requirements, or for knowingly or recklessly violating the law or turning a blind eye to troubling facts.⁵¹

Personal Use

33. Under FECA, campaign funds can be used for authorized expenditures arising from the campaign or the official duties of a sitting officeholder, as well as for "any other lawful purpose."⁵² However, campaign funds cannot be "converted to personal use," *i.e.*, "used

⁴⁸ *Id.* § 30104(a), (b)(4)-(5).

⁴⁹ 11 C.F.R. § 104.3(b)(4)(i).

⁵⁰ 52 U.S.C. § 30102(c)(5); *see* 11 C.F.R. § 102.9(b)(2).

⁵¹ Statement of Policy Regarding Treasurers Subject to Enforcement Proceedings, 70 Fed. Reg. 3, 3-5 (Jan. 3, 2005).

⁵² 52 U.S.C. § 30114(a).

to fulfill any commitment, obligation, or expense . . . that would exist irrespective of the candidate's election campaign" or official duties as an officeholder.⁵³

34. Under Commission regulations, certain types of expenses are considered *per se* prohibited personal use, including, *e.g.*, mortgage, rent, or utility payments for the personal residence of a candidate or candidate's family member.⁵⁴ Other uses of campaign funds are subject to the Commission's case-by-case determination of whether the obligation or expense would exist "irrespective of" the candidate's campaign or officeholder status.⁵⁵

CAUSES OF ACTION

COUNT I

SANTOS KNOWINGLY AND WILLFULLY SERVED AS A STRAW DONOR FOR UNKNOWN PERSONS TO MAKE CONTRIBUTIONS IN THE NAME OF ANOTHER TO SANTOS'S CAMPAIGN COMMITTEE

35. The available information indicates that Santos and other unknown persons engaged in a scheme to provide illegal contributions to Santos's campaign, in which these unknown persons provided money to Santos disguised as income from his wholly owned entity, Devolder LLC, for the specific purpose of contributing to Santos's 2022 campaign for Congress. As such, there is reason to believe unknown persons made, and Santos knowingly and willfully acted as a straw donor for, illegal contributions to his campaign, which the campaign knowingly accepted. Moreover, regardless of whether these unknown persons were corporations, foreign nationals, or individuals, these contributions either exceeded FECA's contribution limits or violated the statutory prohibition on

⁵³ *Id.* § 30114(b).

⁵⁴ 11 C.F.R. § 113.1(g)(1)(i)(E).

⁵⁵ *Id.* § 113.1(g)(1)(ii).

corporate or foreign national contributions, resulting in violations of those provisions by both the contributors and the campaign.

36. During the 2022 election cycle, Santos’s congressional campaign reported receiving candidate loans from Santos totaling \$705,000.⁵⁶ Although a candidate is permitted to loan or contribute an unlimited amount of money to his or her own campaign committee,⁵⁷ the money that they provide must be from their own personal funds, which includes “earned income” from “bona fide employment.”⁵⁸ There is ample information, however, indicating that the money Santos purported to loan his campaign was not earned income from bona fide employment, but was given to him — in the guise of salary and dividends from Devolder LLC — by other persons for the purpose of making undisclosed, prohibited contributions to Santos’s 2022 campaign.
37. When Santos previously ran for Congress during the 2020 election cycle, he loaned his campaign \$81,250, and it is unclear how he was able to afford those loans; in May 2020, Santos disclosed having no assets and receiving “earned income” of only \$55,000 as “salary, commission, and bonus” from his employer at the time, LinkBridge Investors.⁵⁹
38. By marked contrast, just two years later, Santos reported multiple six- and seven-figure assets and income streams in his 2022-cycle financial disclosure report. In terms of assets, Santos disclosed an apartment in Rio de Janeiro, Brazil,⁶⁰ valued between

⁵⁶ Devolder-Santos for Congress, Financial Summary, 2021-2022, <https://www.fec.gov/data/committee/C00721365/> (last visited Jan. 6, 2023).

⁵⁷ See 11 C.F.R. § 110.10 (candidates permitted to make unlimited expenditures from personal funds).

⁵⁸ *Id.* § 100.33 (defining “personal funds” of the candidate to include all assets to which the candidate has legal title or an equitable interest, as well as “salary and other earned income that the candidate earns from bona fide employment”).

⁵⁹ Santos 2020 Financial Disclosure Report.

⁶⁰ Santos is reportedly wanted by Brazilian authorities on an outstanding check fraud criminal investigation. Ashford and Gold, N.Y. TIMES, *supra*.

\$500,000 and \$1 million, a checking account with between \$100,000 and \$250,000, and a savings account with between \$1 million and \$5 million. In terms of income — all of which comes from Devolder LLC (in which Santos claims “100% interest”) — Santos disclosed earning \$750,000 in salary and between \$1 million and \$5 million in dividends in 2021 and 2022.⁶¹

39. The volume and timing of Santos’s dramatic increase in income and assets, the lack of a clear explanation of how he generated that income, his well-documented penchant for dishonesty, and the fact that he then used \$705,000 from his sudden windfall to fund his subsequent congressional campaign strongly suggests that the rapid shift in Santos’s finances was not a mere coincidence, but a direct result of unknown persons directly, and illegally, giving him money to run for federal office.
40. Indeed, based on the fact that Santos’s reported loans to his 2020 campaign (\$81,250) greatly exceeded his reported assets and annual income in 2020 (\$55,000), it is likely that Santos also funneled outside money into his 2020 congressional campaign.
41. Santos has publicly claimed that he earned large amounts of money through Devolder LLC’s business of “capital introduction consulting,” which he describes as essentially brokering deals between wealthy clients seeking to buy or sell luxury goods. But Santos has declined to provide any specifics of deals that he brokered, there is no other corroborating evidence that Devolder LLC was a bona fide business that earned millions of dollars, and in light of Santos’s pattern of flagrantly lying to the public about his personal and professional history, his claims about Devolder LLC cannot be accepted at face value.

⁶¹ Santos 2022 Financial Disclosure Report.

42. Santos's financial disclosure reports clearly show that he could not have loaned his campaign anywhere close to \$705,000 without the sudden financial windfall that he claims as purported income from Devolder LLC, but it is wildly implausible that Devolder LLC generated sufficient revenue in such a short span for Santos to report total income of between \$3.5 million and \$11.5 million, as well as between \$1.1 million and \$5.25 million in the bank (between his checking and savings accounts). This is particularly true when Santos did not report that any client paid him more than \$5,000 for his personal services, which both makes it exceedingly difficult to amass that level of wealth and contradicts his assertion of obtaining multi-million-dollar contracts.⁶²
43. It is far more likely, instead, that after failing to win his 2020 bid for Congress, Santos and other unknown persons worked out a scheme to surreptitiously — and illegally — funnel money into his 2022 campaign. The concealed true source behind \$705,000 in contributions to Santos's campaign could be a corporation or foreign national — both of which are categorically barred from contributing to federal candidates — or one or more individuals, who would be precluded from contributing such a large amount, far in excess of FECA's contribution limits.
44. Devolder LLC's supposed overnight financial success was essentially contemporaneous with Santos's 2022 campaign for federal office. Santos declared his federal candidacy for the 2022 election on April 17, 2021.⁶³ He incorporated Devolder LLC in Florida three weeks later, on May 11, 2021.⁶⁴ On June 30, 2021, Santos loaned his campaign

⁶² *Id.*; see House Financial Disclosure Rules at 39-40 (stating that a person with an ownership interest in their employer (such as a 100% owner, as Santos purports to be for Devolder LLC), who personally performs services that earn a fee in excess of \$5,000 from a client, must report such clients); see also Ashford and Gold, N.Y. TIMES, *supra* (commenting on the oddity of the missing client information).

⁶³ Santos Statement of Candidacy.

⁶⁴ See Exhibit A.

\$80,000.⁶⁵ It is simply not credible, particularly in light of Santos’s history of outright lies and obfuscation, that just 10 weeks after forming Devolder LLC, Santos had earned enough in bona fide income to loan his campaign a sum equal to \$25,000 more than he had earned in *total income* the previous year.⁶⁶ It is also implausible that Santos was able to campaign for federal office while simultaneously running a brand new, wildly successful business brokering the sale or purchase of multi-million dollar assets. The most logical conclusion is that this money was *not* bona fide income, but was provided to Santos, through Devolder LLC, to illegally fund the Santos campaign.

45. Santos loaned his campaign another \$500,000 on March 31, 2022,⁶⁷ and a final \$125,000 on October 26, 2022.⁶⁸ It is noteworthy that Santos’s campaign failed to disclose the details of the latter loan, even after receiving an RFAI letter from the FEC pointing out the reporting failure.⁶⁹ Clearly, any of these candidate loans would have been impossible for Santos to make absent the implausible, sudden reversal of his fortunes immediately after his failed 2020 campaign.
46. Viewed as a whole, these facts — particularly the sudden, vaguely explained infusion of millions of dollars into Santos’s newly minted, wholly owned company, which allowed him to make six-figure loans to his campaign — supports finding reason to believe that unknown persons gave money to Santos, through Devolder LLC, for the purpose of influencing a federal election, such that the transactions resulted in straw donor

⁶⁵ Devolder-Santos for Congress, Amend. July 2021 Quarterly Report at 122 (Sept. 12, 2022).

⁶⁶ *Id.*; Santos 2020 Financial Disclosure Report.

⁶⁷ Devolder-Santos for Congress, Amend. April 2022 Quarterly Report at 108 (Sept. 12, 2022).

⁶⁸ Devolder-Santos for Congress, 48-Hour Notice of Contributions/Loans Rec’d at 1 (Oct. 28, 2022).

⁶⁹ Santos’s campaign received an RFAI letter from the FEC regarding its failure to itemize the October 26, 2022, loan, as required, on its 2022 Post-General Election Report. RFAI Letter to Nancy Marks, Treasurer, Devolder-Santos for Congress, from FEC, Reference: 30 Day Post-Gen. Report (Dec. 20, 2022).

contributions by unknown persons to Santos’s campaign, using Santos and Devolder LLC as conduits.

47. The available facts therefore support finding reason to believe that Santos violated 52 U.S.C. § 30122 by knowingly and willfully serving as a straw donor for \$705,000 in contributions to his campaign committee, that one or more unknown persons — which may include individual persons or corporations — violated 52 U.S.C. § 30122 by providing funds to Santos for the purpose of making contributions to his campaign without disclosing their identity, and that Santos’s campaign violated 52 U.S.C. § 30122 by knowingly and willfully accepting these contributions in the names of others.⁷⁰
48. Moreover, these contributions from unknown persons were either excessive or prohibited under FECA’s contribution amount limits or source prohibitions. If the true contributor was a corporation or foreign national, then the contributions made to Santos’s campaign through Devolder LLC and Santos would be prohibited under 52 U.S.C. §§ 30118 or 30121, statutory provisions that categorically prohibit contributions from these respective prohibited sources. Indeed, if Devolder LLC is taxed as a corporation and Santos diverted

⁷⁰ FECA prescribes additional penalties for “knowing and willful” violations, *see* 52 U.S.C. § 30109(a)(5)(B), (d), which are defined as “actions taken with full knowledge of all the facts and a recognition that the action is prohibited by law,” 122 Cong. Rec. 12,197, 12,199 (May 3, 1976) (statement of Rep. Hays); *see, e.g.*, Factual & Legal Analysis at 3–4, MUR 6920 (Now or Never PAC, *et al.*) (applying “knowing and willful” standard); Factual & Legal Analysis at 17–18, MUR 6766 (Jesse Jackson, Jr., *et al.*) (same). This standard does not require knowledge of the specific statute or regulation that the respondent allegedly violated; it is sufficient to demonstrate that a respondent “acted voluntarily and was aware that his conduct was unlawful.” *United States v. Danielczyk*, 917 F. Supp. 2d 573, 579 (E.D. Va. 2013) (quoting *Bryan v. United States*, 524 U.S. 184, 195 (1998) (holding that the government needs to show only that the defendant acted with knowledge that their conduct was unlawful, not knowledge of the specific statutory provision violated, to establish a willful violation)). Such awareness may be shown through circumstantial evidence from which the respondents’ unlawful intent may be reasonably inferred, including, *e.g.*, an “elaborate scheme for disguising” unlawful acts. *United States v. Hopkins*, 916 F.2d 207, 214–15 (5th Cir. 1990) (“It has long been recognized that ‘efforts at concealment [may] be reasonably explainable only in terms of motivation to evade’ lawful obligations.” (quoting *Ingram v. United States*, 360 U.S. 672, 679 (1959))).

funds from the LLC to himself to make the loans in question, Devolder LLC would thereby have made prohibited corporate contributions.⁷¹

49. Alternatively, if the true source of these contributions was one or more individual persons, including wealthy individuals, partnerships, or unincorporated LLCs,⁷² then the contributions were excessive under 52 U.S.C. §§ 30116(a)(1)(A) and (f), which prohibits the making and knowing acceptance, respectively, of aggregate contributions to an authorized campaign committee in excess of \$2,900 per election.

COUNT II

SANTOS'S CAMPAIGN COMMITTEE DELIBERATELY VIOLATED FECA'S DISCLOSURE REQUIREMENTS, INCLUDING BY FALSIFYING ITS REPORTED DISBURSEMENTS

50. Santos's campaign filed inaccurate disclosure reports throughout the 2022 election cycle, including failing to reattribute or refund excessive contributions⁷³ and failing to even disclose the details of Santos's \$125,000 loan to his campaign on October 26, 2022,⁷⁴ as required under FECA and Commission regulations. Moreover, Santos's campaign committee reported an implausible number of disbursements for an amount between \$199 and \$200, and at least some of these disbursements could not possibly have been for the amount the Santos campaign reported paying for the goods or services they reported receiving.
51. Accordingly, there is reason to believe Santos's campaign knowingly and willfully violated 52 U.S.C. § 30104(b) by filing false disclosure reports throughout the 2022 cycle, including deliberately reporting inaccurate disbursement figures that do not reflect

⁷¹ See 52 U.S.C. § 30118(a); 11 C.F.R. § 110.1(g)(3).

⁷² See 11 C.F.R. § 110.1(e), (g).

⁷³ See, e.g., RFAI Letter to Nancy Marks, Treasurer, Devolder-Santos for Congress, from FEC, Reference: Amend. 12 Day Pre-Primary Report (Oct. 5, 2022).

⁷⁴ RFAI Letter to Nancy Marks, Reference: 30-Day Post Gen. Report, *supra*.

how the campaign actually spent its money, and that the campaign treasurer is personally liable for the reporting violations, as she had (at a minimum) reason to suspect that the reported disbursements were false and bore the responsibility to ensure accurate reporting.

52. During the 2022 election cycle, Santos’s campaign reported 40 disbursements between \$199 and \$200, 37 of which were all for the exact same amount, \$199.99. When contribution refunds and earmarked contributions are excluded, *all* political committees reported just 75 discrete disbursements for \$199.99 during the 2022 election cycle. In other words, Santos’s campaign made approximately half of all disbursements (37 out of 75) for this particular amount, which is statistically implausible and strongly suggests that the Santos campaign is not accurately disclosing its disbursements.
53. Moreover, certain disbursements for \$199.99 appear to be impossible, based on the reported purpose for which the campaign spent its money. For instance, Santos’s campaign reported spending \$199.99 on October 13, 2021, at the W Hotel South Beach, a luxury hotel in Miami Beach, Florida, for a “Hotel Stay.”⁷⁵ However, even a mid-week, one-night, one-adult stay, in October, at the W Hotel South Beach costs substantially more than \$199.99; this luxury hotel’s lowest-price room for such a stay would cost more than \$700.⁷⁶ Simply put, barring some type of private insider rate that would raise other

⁷⁵ Devolder-Santos for Congress, Amend. 2021 Year-End Report at 165 (Sept. 12, 2022). In fact, the Santos campaign also reported two other abnormally low disbursements to the same hotel, both on October 17, 2021, for \$202.74 and \$514.02; it is unclear, again, how the campaign was able to book a “hotel stay” for this amount at this hotel. *See id.* at 166.

⁷⁶ *See* Exhibit E.

serious violations of federal campaign finance law,⁷⁷ the Santos campaign could not have paid \$199.99 for a “Hotel Stay” at the W Hotel South Beach.

54. Likewise, the Santos campaign’s reported disbursement of \$199.99 to CLEAR for “Travel” is most likely inaccurate. CLEAR, a pre-clearance service that allows travelers to be rapidly screened at airport security checkpoints, is available for \$189 for a standard annual membership (barring any applicable discounts, which would of course drop the price further).⁷⁸ It is unclear how the Santos campaign could have spent \$199.99 on a “Travel” service offered by CLEAR.
55. Similarly, the disbursement of \$199.99 at JFK for a “Parking Fee” likewise makes no sense; JFK’s parking fees — like those at most major airports — are set in whole dollar increments, inclusive of any applicable taxes.⁷⁹ As such, someone could conceivably pay \$200 for parking at JFK, but could not conceivably pay \$199.99.
56. Additionally, other Santos campaign reported disbursements, while conceivable, appear extremely unlikely and suggest the campaign deliberately obfuscated how it actually spent its money. For example, the campaign reported nine separate disbursements of \$199.99 for “Office Supplies” at a variety of different vendors, including Best Buy, Staples, Walgreens, Target, and Walmart. It is virtually impossible that the Santos campaign actually spent this identical amount on office supplies at different stores on

⁷⁷ See 11 C.F.R. § 100.52(d)(1) (defining contributions to include the provision of goods or services at less than the prevailing usual and normal charge).

⁷⁸ See Exhibit F.

⁷⁹ JFK Parking Rates.

nine separate occasions — including two disbursements at Staples on December 27 and 28, 2021.

57. Santos’s campaign also reported making seven disbursements of \$199.99 at “Il Bacco Ristorante” for food and beverage, including *twice in one day* on November 30, 2021. This almost certainly is not an accurate accounting of the campaign’s expenses and suggests instead that the payments were either falsely reported or structured to avoid crossing the \$200 mark.
58. These odd and seemingly impossible disbursements should, moreover, be viewed in light of the Santos campaign’s repeated failure to comply with FECA’s disclosure requirements. Throughout the 2022 election cycle, Santos’s campaign received 20 RFAI letters from the FEC flagging a variety of serious reporting problems, including accepting excessive contributions and, most recently, a failure to file the required schedule disclosing Santos’s loan of \$125,000 to his campaign on October 26, 2022.⁸⁰ While the campaign amended several disclosure reports, it has not itemized the third Santos loan, and the receipt and reporting of apparently excessive contributions does not appear to have been cured either through reattribution of the excessive contributions or issuing contribution refunds; indeed, the Santos campaign reported making no contribution refunds whatsoever, an extremely dubious feat in itself.⁸¹
59. In sum, the available information clearly supports finding reason to believe that the Santos campaign and its treasurer deliberately misreported disbursements, in clear violation of their reporting obligations under 52 U.S.C. § 30104(b).

⁸⁰ RFAI Letter to Nancy Marks, Reference: 30-Day Post Gen. Report, *supra*.

⁸¹ Devolder-Santos for Congress, Financial Summary, 2021-2022, <https://www.fec.gov/data/committee/C00721365/> (last visited Jan. 6, 2023).

COUNT III
**SANTOS ILLEGALLY USED CAMPAIGN FUNDS TO PAY FOR PERSONAL EXPENSES,
INCLUDING RENT ON HIS PERSONAL RESIDENCE**

60. Santos and his campaign appear to have illegally spent campaign funds on personal expenses, including by paying rent for the personal residences of Santos and/or his campaign staffers, in clear violation of FECA’s prohibition at 52 U.S.C. § 30114(b) and Commission regulations.
61. Santos’s campaign appears to have spent \$13,500 on rent payments for Santos’s personal residence in blatant violation of the law.⁸² Santos’s campaign paid \$10,900 to “Cleaner 123 Inc.” in five separate disbursements between June 2022 and September 2022. The disbursements are each described as “Apartment Rental for Staff,” “Rent,” or “Rent & Rent Deposit.”⁸³ The address associated with each of these expenditures — 18 Juniper Place, Huntington, NY — is the location of a single-family house in a Long Island, NY, suburban neighborhood. Another earlier disbursement is likely a payment for the same purpose; the disbursement of \$2,600 to “Russell Levinson” on May 10, 2022, also lists the “18 Juniper Place” address and is also described as “Apartment Rental for Staff.”⁸⁴
62. Moreover, according to a report in the *New York Times*, with respect to the house at the “18 Juniper Place” address: “[O]ne neighbor said Mr. Santos himself had been living there for months, and two others said that they had seen Mr. Santos and his husband coming and going.”⁸⁵
63. Commission regulations specify that using campaign funds to pay mortgage, rent, or utility payments on the personal residence of a candidate or candidate’s family member is

⁸² See Table of “Rent” payments, *supra*.

⁸³ *Id.*

⁸⁴ *Id.*

⁸⁵ Ashford and Rubinstein, N.Y. TIMES, *supra*.

per se personal use.⁸⁶ Particularly when viewed in light of the Santos campaign’s numerous fraudulent disclosures to the FEC and the public, it is not only plausible but likely that the campaign falsely reported paying rent “for staff” — which itself might constitute the personal use of campaign funds for an expense that would exist irrespective of the campaign — on a property that was actually the candidate’s personal residence. Indeed, that conclusion is supported by the *New York Times* report indicating that Santos was living in the house at the “18 Juniper Place” address “for months” during the 2022 campaign, and was observed routinely coming and going from the house with his husband.

64. As such, there is sufficient information to find reason to believe Santos was living in that house while the campaign was paying \$13,500 to rent it, such that Santos and the Santos campaign knowingly and willfully violated FECA’s statutory ban on the conversion of campaign funds to personal use at 52 U.S.C. § 30114(b).

PRAYER FOR RELIEF

65. Wherefore, the Commission should find reason to believe that Respondents have violated 52 U.S.C. § 30101 *et seq.*, and conduct an immediate investigation under 52 U.S.C. § 30109(a)(2).

⁸⁶ 11 C.F.R. § 113.1(g)(1)(i)(E).

66. Further, the Commission should seek appropriate sanctions for any and all violations, including civil penalties sufficient to deter future violations, injunctive relief to remedy these violations and prohibit any and all future violations, and such additional remedies as are necessary and appropriate to ensure compliance with FECA.

Respectfully submitted,

/s/ Saurav Ghosh
Campaign Legal Center, by
Saurav Ghosh, Esq.
1101 14th Street NW, Suite 400
Washington, DC 20005
(202) 736-2200

/s/ Roger G. Wieand
Roger G. Wieand
1101 14th Street NW, Suite 400
Washington, DC 20005
(202) 736-2200

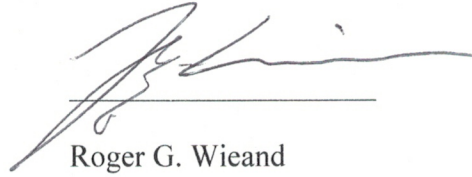
Saurav Ghosh, Esq.
Campaign Legal Center
1101 14th Street NW, Suite 400
Washington, DC 20005
Counsel to the Campaign Legal Center,
Roger G. Wieand
January 9, 2023

VERIFICATION

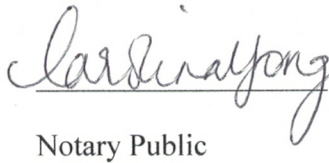
The complainants listed below hereby verify that the statements made in the attached Complaint are, upon their information and belief, true.

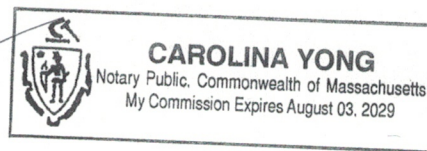
Sworn pursuant to 18 U.S.C. § 1001.

For Complainant Roger G. Wieand


Roger G. Wieand

Sworn to and subscribed before me this 7th day of January 2023.


Notary Public



VERIFICATION

The complainants listed below hereby verify that the statements made in the attached Complaint are, upon their information and belief, true.

Sworn pursuant to 18 U.S.C. § 1001.

For Complainant Campaign Legal Center



Saurav Ghosh, Esq.

Sworn to and subscribed before me this 9th day of January 2023.



Notary Public



EXHIBIT A

L2100026150

Florida Department of State
Division of Corporations
Electronic Filing Cover Sheet

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DEVOLDER ORGANIZATION LLC**

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ARTICLES OF ORGANIZATION
FOR
FLORIDA LIMITED LIABILITY COMPANY

ARTICLE I - Name:

The name of the Limited Liability Company is: *(Must end with the words "Limited Liability Company," "L.L.C.," or "LLC.")*

Devolder Organization LLC

ARTICLE II - Address:

The mailing address and street address of the principal office of the Limited Liability Company is:

336 N. Babcock St. Ste 104
Melbourne, FL 32935

ARTICLE III - Registered Agent, Registered Office:

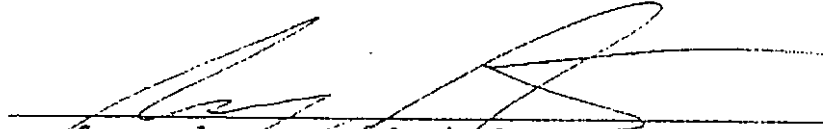
The name and the Florida street address of the registered agent are: *(The Limited Liability Company cannot serve as its own Registered Agent. You must designate an individual or another business entity with an active Florida registration.)*

D + D International Investment Services INC
336 N. Babcock St Ste 101
Melbourne, FL 32935

ARTICLE IV-

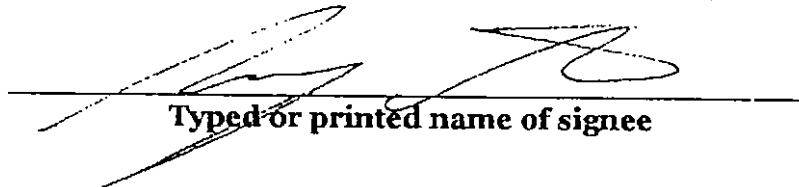
The name and title of each person authorized to manage and control the Limited Liability Company:

George A. Devolder-Santos
AMBR

Required Signatures:**Signature of a member or an authorized representative of a member.**

In accordance with section 605.0203 (1) (b), Florida Statutes, the execution of this document constitutes an affirmation under the penalties of perjury that the facts stated herein are true.

I am aware that any false information submitted in a document to the Department of State constitutes a third degree felony as provided for in s.817.155, F.S.

**Typed or printed name of signee**

Having been named as registered agent and to accept service of process for the above stated limited liability company at the place designated in this certificate, I hereby accept the appointment as registered agent and agree to act in this capacity. I further agree to comply with the provisions of all statutes relating to the proper and complete performance of my duties, and I am familiar with and accept the obligations of my position as registered agent as provided for in Chapter 605, F.S.

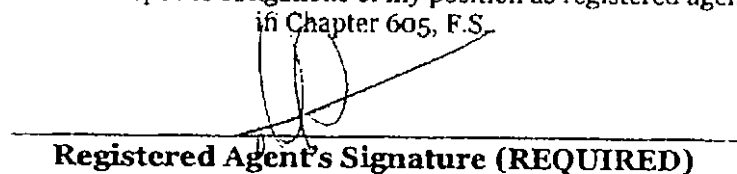
**Registered Agent's Signature (REQUIRED)**

EXHIBIT B

L21000194801

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Division of Corporations
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**FLORIDA LIMITED LIABILITY CO.
RED STRATEGIES USA, LLC**

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ARTICLES OF ORGANIZATION
FOR
FLORIDA LIMITED LIABILITY COMPANY

ARTICLE I - Name:

The name of the Limited Liability Company is: *(Must end with the words "Limited Liability Company," "LLC," or "LLC.")*

Red Strategies USA, LLC

ARTICLE II - Address:

The mailing address and street address of the principal office of the Limited Liability Company is:

336 N. Babcock St Ste 104
Melbourne, FL 32935

ARTICLE III - Registered Agent, Registered Office:

The name and the Florida street address of the registered agent are: *(The Limited Liability Company cannot serve as its own Registered Agent. You must designate an individual or another business entity with an active Florida registration.)*

D+B International Investment Services
336 N Babcock St Ste 101 INC
Melbourne, FL 32935

ARTICLE IV:

The name and title of each person authorized to manage and control the Limited Liability Company:

See "Attachment A"

Attachment A

Devolder Organization LLC AMBR

336 N Babcock St., Ste 104

Melbourne, FL 32935

Paul Nicolini and Associates Inc. MBR

336 N Babcock St., Ste 104

Melbourne, FL 32935

Jayson Benoit & Associates Inc. MBR

336 N Babcock St., Ste 104

Melbourne, FL 32935

D&D International Investments Services, Inc. AMBR

336 N Babcock St., Ste 101

Melbourne, FL 32935

Red Strategies Video Inc. MBR

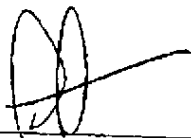
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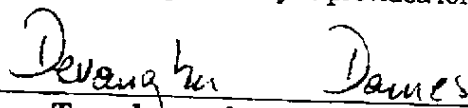
GMG Printing Marketing Resource LLC AMBR

PO Box 677

Shirley, NY 11967

Required Signatures:**Signature of a member or an authorized representative of a member.**

In accordance with section 605.0203 (1) (b), Florida Statutes, the execution of this document constitutes an affirmation under the penalties of perjury that the facts stated herein are true. I am aware that any false information submitted in a document to the Department of State constitutes a third degree felony as provided for in s.817.155, F.S.

**Typed or printed name of signee**

Having been named as registered agent and to accept service of process for the above stated limited liability company at the place designated in this certificate, I hereby accept the appointment as registered agent and agree to act in this capacity. I further agree to comply with the provisions of all statutes relating to the proper and complete performance of my duties, and I am familiar with and accept the obligations of my position as registered agent as provided for in Chapter 605, F.S..

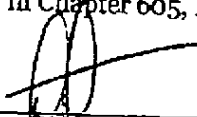
**Registered Agent's Signature (REQUIRED)**

EXHIBIT C

List of Disbursements By Devolder-Santos for Congress Between \$199 and \$199.99

Date	Amount	Recipient	Recipient State	Disbursement Description	Category Code Description
10/30/21	199.99	AMERICAN AIRLINES	TX	AIRFARE	Travel Expenses
12/1/21	199.99	AMTRAK	NY	TRANSPORTATION SVC	Travel Expenses
11/16/21	199.99	AMTRAK	NY	TRANSPORTATION SVC	Travel Expenses
2/7/22	199.99	BEST BUY	NY	OFFICE SUPPLIES	Administrative/Salary/Overhead Expenses
11/14/21	199.99	BEST BUY	NY	OFFICE SUPPLIES	Administrative/Salary/Overhead Expenses
11/10/21	199.99	BEST BUY	NY	OFFICE SUPPLIES	Administrative/Salary/Overhead Expenses
10/24/21	199.99	BJ'S WHOLESALE	NY	OFFICE SUPPLIES	Administrative/Salary/Overhead Expenses
8/22/21	199.99	BJ'S WHOLESALE	NY	OFFICE SUPPLIES	Administrative/Salary/Overhead Expenses
10/18/21	199.99	CLEAR	NY	TRAVEL	Travel Expenses
12/31/21	199.99	DELTA AIRLINES	GA	AIRFARE	Travel Expenses
11/28/21	199.99	DELTA AIRLINES	GA	AIRFARE	Travel Expenses
11/1/21	199.99	DELTA AIRLINES	GA	AIRFARE	Travel Expenses
8/13/21	199.99	DELTA AIRLINES	GA	AIRFARE	Travel Expenses
11/12/21	199.99	HYATT CORAZON	FL	FOOD AND BEVERAGE	Administrative/Salary/Overhead Expenses
7/22/21	199.99	HYATT ORLANDO HOTEL	FL	HOTEL STAY	Travel Expenses
12/18/21	199.99	IL BACCO RESTAURANTE	NY	FOOD/BEVERAGE	Administrative/Salary/Overhead Expenses
11/30/21	199.99	IL BACCO RESTAURANTE	NY	FOOD/BEVERAGE	Administrative/Salary/Overhead Expenses
11/30/21	199.99	IL BACCO RESTAURANTE	NY	FOOD AND BEVERAGE	Administrative/Salary/Overhead Expenses
10/6/21	199.99	IL BACCO RESTAURANTE	NY	FOOD AND BEVERAGE	Administrative/Salary/Overhead Expenses
9/19/21	199.99	IL BACCO RESTAURANTE	NY	FOOD/BEVERAGE	Administrative/Salary/Overhead Expenses
8/21/21	199.17	IL BACCO RESTAURANTE	NY	STAFF DINNER MEETING	Administrative/Salary/Overhead Expenses
4/23/21	199.99	IL BACCO RESTAURANTE	NY		Administrative/Salary/Overhead Expenses
4/3/21	199.99	IL BACCO RESTAURANTE	NY	FOOD/BEVERAGE	Administrative/Salary/Overhead Expenses
10/18/21	199.99	JFK PARKING	NY	PARKING FEE	Travel Expenses
10/13/21	199.99	MIAMI DINER	FL	FOOD & BEVERAGE	Administrative/Salary/Overhead Expenses
11/10/21	199.99	PRICELINE	CT	TRAVEL INSURANCE	Travel Expenses
10/15/21	199.99	SEASIDE GRILL	FL	FOOD AND BEVERAGE	Administrative/Salary/Overhead Expenses
2/14/21	199	SEVEN SEAS	NY	FOOD/BEVERAGE	Administrative/Salary/Overhead Expenses
12/28/21	199.99	STAPLES	NY	OFFICE SUPPLIES	Administrative/Salary/Overhead Expenses

12/27/21	199.99	STAPLES	NY	OFFICE SUPPLIES	Administrative/Salary/Overhead Expenses
10/5/21	199.99	TARGET FLUSHING	NY	OFFICE SUPPLIES	Administrative/Salary/Overhead Expenses
8/13/22	199.35	THE HOME DEPOT	NY	CAMPAIGN SIGN MATERIALS	Campaign Materials
12/18/21	199.99	UBER	CA	TAXI FARE	Travel Expenses
11/7/21	199.99	UBER	CA	TAXI FARE	Travel Expenses
10/18/21	199.99	UBER	CA	TAXI FARE	Travel Expenses
10/17/21	199.99	UBER	CA	TAXI FARE	Travel Expenses
10/8/21	199.99	UBER	CA	TAXI FARE	Travel Expenses
10/13/21	199.99	W HOTEL SOUTH BEACH	FL	HOTEL STAY	Travel Expenses
10/18/21	199.99	WALGREENS	NY	OFFICE SUPPLIES	Administrative/Salary/Overhead Expenses
12/9/21	199.99	WALMART	NY	OFFICE SUPPLIES	Administrative/Salary/Overhead Expenses

EXHIBIT D

List of All 2021-2022 Disbursements Reported to the Commission of \$199.99

Committee	Date	Amount	Recipient	Recipient State	Disbursement Description	Category Code Description
ACTBLUE	4/2/21	199.99	UDEMY.COM	CA	AMEX 4/30: TRAINING COURSE FEE	Administrative/Salary/Overhead Expenses
ADAM METZENDORF FOR CONGRESS	7/1/22	199.99	DUNCAN, CAMERON	AZ	IN KIND CONTRIBUTION: EVENT SUPPLIES	
ALASKANS FOR DON YOUNG	8/10/21	199.99	WINRED	VA	TRANSACTION FEES	Administrative/Salary/Overhead Expenses
ALEK FOR OREGON	4/26/21	199.99	STAPLES	MA	OFFICE SUPPLIES	
AMODEI FOR NEVADA	12/20/21	199.99	BEST BUY	NV	ANNUAL TECH SUPPORT FEE FOR OFFICE EQUIPMENT	Administrative/Salary/Overhead Expenses
AUBURN AREA DEMOCRATIC CLUB	8/8/22	199.99	GODADDY.COM	AZ	ADMINISTRATIVE EXPENSE	Administrative/Salary/Overhead Expenses
BEN DIAMOND FOR CONGRESS	5/12/22	199.99	THE HANGAR RESTAURANT & FLIGHT LOUNGE	FL	MEALS	
CARRICK FLYNN FOR OREGON	3/24/22	199.99	AMAZON.COM	WA	OFFICE SUPPLIES & FURNITURE	Administrative/Salary/Overhead Expenses
CICELY DAVIS FOR CONGRESS	11/26/21	199.99	COSTCO	MN	OFFICE SUPPLIES	Administrative/Salary/Overhead Expenses
CINDY AXNE FOR CONGRESS	2/2/21	199.99	AXNE, JOHN	IA	REIMBURSEMENT/SECURITY CAMERA	
CINDY AXNE FOR CONGRESS	1/16/21	199.99	BEST BUY	IA	SECURITY CAMERA	
CITIZENS FOR ELEANOR HOLMES NORTON	3/15/21	199.99	BEST BUY	DC	SUPPLIES	
COMMITTEE TO ELECT JULIE HALL	8/18/21	199.99	GODADDY	AZ	WEBSITE	Administrative/Salary/Overhead Expenses
DAVID ROUZER FOR CONGRESS	1/5/21	199.99	CAPITOL HILL CLUB	DC	FOOD/BEVERAGE	Administrative/Salary/Overhead Expenses

DEMOCRATIC PARTY COMMITTEE ABROAD	10/14/22	199.99	LA POSTE		POSTAGE	
DEVOLDER-SANTOS FOR CONGRESS	10/30/21	199.99	AMERICAN AIRLINES	TX	AIRFARE	Travel Expenses
DEVOLDER-SANTOS FOR CONGRESS	12/1/21	199.99	AMTRAK	NY	TRANSPORTATION SVC	Travel Expenses
DEVOLDER-SANTOS FOR CONGRESS	11/16/21	199.99	AMTRAK	NY	TRANSPORTATION SVC	Travel Expenses
DEVOLDER-SANTOS FOR CONGRESS	11/10/21	199.99	BEST BUY	NY	OFFICE SUPPLIES	Administrative/Salary/Overhead Expenses
DEVOLDER-SANTOS FOR CONGRESS	11/14/21	199.99	BEST BUY	NY	OFFICE SUPPLIES	Administrative/Salary/Overhead Expenses
DEVOLDER-SANTOS FOR CONGRESS	2/7/22	199.99	BEST BUY	NY	OFFICE SUPPLIES	Administrative/Salary/Overhead Expenses
DEVOLDER-SANTOS FOR CONGRESS	8/22/21	199.99	BJ'S WHOLESALE	NY	OFFICE SUPPLIES	Administrative/Salary/Overhead Expenses
DEVOLDER-SANTOS FOR CONGRESS	10/24/21	199.99	BJ'S WHOLESALE	NY	OFFICE SUPPLIES	Administrative/Salary/Overhead Expenses
DEVOLDER-SANTOS FOR CONGRESS	10/18/21	199.99	CLEAR	NY	TRAVEL	Travel Expenses
DEVOLDER-SANTOS FOR CONGRESS	8/13/21	199.99	DELTA AIRLINES	GA	AIRFARE	Travel Expenses
DEVOLDER-SANTOS FOR CONGRESS	11/28/21	199.99	DELTA AIRLINES	GA	AIRFARE	Travel Expenses
DEVOLDER-SANTOS FOR CONGRESS	11/1/21	199.99	DELTA AIRLINES	GA	AIRFARE	Travel Expenses
DEVOLDER-SANTOS FOR CONGRESS	12/31/21	199.99	DELTA AIRLINES	GA	AIRFARE	Travel Expenses
DEVOLDER-SANTOS FOR CONGRESS	11/12/21	199.99	HYATT CORAZON	FL	FOOD AND BEVERAGE	Administrative/Salary/Overhead Expenses
DEVOLDER-SANTOS FOR CONGRESS	7/22/21	199.99	HYATT ORLANDO HOTEL	FL	HOTEL STAY	Travel Expenses
DEVOLDER-SANTOS FOR CONGRESS	4/23/21	199.99	IL BACCO RESTAURANTE	NY		Administrative/Salary/Overhead Expenses

DEVOLDER-SANTOS FOR CONGRESS	4/3/21	199.99	IL BACCO RESTAURANTE	NY	FOOD/BEVERAGE	Administrative/Salary/Overhead Expenses
DEVOLDER-SANTOS FOR CONGRESS	9/19/21	199.99	IL BACCO RESTAURANTE	NY	FOOD/BEVERAGE	Administrative/Salary/Overhead Expenses
DEVOLDER-SANTOS FOR CONGRESS	11/30/21	199.99	IL BACCO RESTAURANTE	NY	FOOD/BEVERAGE	Administrative/Salary/Overhead Expenses
DEVOLDER-SANTOS FOR CONGRESS	12/18/21	199.99	IL BACCO RESTAURANTE	NY	FOOD/BEVERAGE	Administrative/Salary/Overhead Expenses
DEVOLDER-SANTOS FOR CONGRESS	10/6/21	199.99	IL BACCO RESTAURANTE	NY	FOOD AND BEVERAGE	Administrative/Salary/Overhead Expenses
DEVOLDER-SANTOS FOR CONGRESS	11/30/21	199.99	IL BACCO RESTAURANTE	NY	FOOD AND BEVERAGE	Administrative/Salary/Overhead Expenses
DEVOLDER-SANTOS FOR CONGRESS	10/18/21	199.99	JFK PARKING	NY	PARKING FEE	Travel Expenses
DEVOLDER-SANTOS FOR CONGRESS	10/13/21	199.99	MIAMI DINER	FL	FOOD & BEVERAGE	Administrative/Salary/Overhead Expenses
DEVOLDER-SANTOS FOR CONGRESS	11/10/21	199.99	PRICELINE	CT	TRAVEL INSURANCE	Travel Expenses
DEVOLDER-SANTOS FOR CONGRESS	10/15/21	199.99	SEASIDE GRILL	FL	FOOD AND BEVERAGE	Administrative/Salary/Overhead Expenses
DEVOLDER-SANTOS FOR CONGRESS	12/27/21	199.99	STAPLES	NY	OFFICE SUPPLIES	Administrative/Salary/Overhead Expenses
DEVOLDER-SANTOS FOR CONGRESS	12/28/21	199.99	STAPLES	NY	OFFICE SUPPLIES	Administrative/Salary/Overhead Expenses
DEVOLDER-SANTOS FOR CONGRESS	10/5/21	199.99	TARGET FLUSHING	NY	OFFICE SUPPLIES	Administrative/Salary/Overhead Expenses
DEVOLDER-SANTOS FOR CONGRESS	12/18/21	199.99	UBER	CA	TAXI FARE	Travel Expenses
DEVOLDER-SANTOS FOR CONGRESS	10/8/21	199.99	UBER	CA	TAXI FARE	Travel Expenses
DEVOLDER-SANTOS FOR CONGRESS	10/18/21	199.99	UBER	CA	TAXI FARE	Travel Expenses

DEVOLDER-SANTOS FOR CONGRESS	10/17/21	199.99	UBER	CA	TAXI FARE	Travel Expenses
DEVOLDER-SANTOS FOR CONGRESS	11/7/21	199.99	UBER	CA	TAXI FARE	Travel Expenses
DEVOLDER-SANTOS FOR CONGRESS	10/13/21	199.99	W HOTEL SOUTH BEACH	FL	HOTEL STAY	Travel Expenses
DEVOLDER-SANTOS FOR CONGRESS	10/18/21	199.99	WALGREENS	NY	OFFICE SUPPLIES	Administrative/Salary/Overhead Expenses
DEVOLDER-SANTOS FOR CONGRESS	12/9/21	199.99	WALMART	NY	OFFICE SUPPLIES	Administrative/Salary/Overhead Expenses
DNC SERVICES CORP / DEMOCRATIC NATIONAL COMMITTEE	5/15/22	199.99	DELTA AIR LINES	GA	TRAVEL; AIRFARE	
ELECTING WOMEN POLITICAL ACTION COMMITTEE	9/9/21	199.99	GODADDY.COM	AZ	WEBSITE DOMAIN REGISTRATION	
ELECTING WOMEN POLITICAL ACTION COMMITTEE	7/11/22	199.99	GODADDY.COM	AZ	WEBSITE DOMAIN REGISTRATION	
FAIR FIGHT	4/30/21	199.99	GO DADDY	AZ	WEBSITE SERVICES	
FAIR FIGHT	5/1/22	199.99	GO DADDY	AZ	WEBSITE SERVICES	
FRIENDS FOR GREGORY MEEKS	6/21/21	199.99	SECURITY METRIC	UT	SOFTWARE	
FRIENDS OF INTELLIGENT DEMOCRACY	9/8/21	199.99	GODADDY	AZ	MANAGED SSL RENEWAL	Administrative/Salary/Overhead Expenses
FRIENDS OF MATT GAETZ	7/31/21	199.99	SILVER AIR	FL	AIRFARE	Travel Expenses
JAIME HARRISON FOR US SENATE	1/20/22	199.99	GODADDY	AZ	SOFTWARE	
JOINT ACTION COMMITTEE FOR POLITICAL AFFAIRS	7/15/22	199.99	ZOOM	KS	ONLINE FEE	
LAPIERRE FOR HOUSE	2/8/22	199.99	FACEBOOK, INC.	CA	ADVERTISING EXPENSES	Advertising Expenses

LOUDERMILK FOR CONGRESS	6/11/21	199.99	GODADDY.COM	AZ	WEB HOSTING	Administrative/Salary/Overhead Expenses
LUCAS FOR CONGRESS	2/6/22	199.99	BEST BUY	OK	ANTI-VIRUS SOFTWARE	Administrative/Salary/Overhead Expenses
MANGA FOR CONGRESS	7/20/21	199.99	GODADDY	AZ	WEB HOSTING	Administrative/Salary/Overhead Expenses
MCHENRY FOR CONGRESS	2/18/21	199.99	VERIZON WIRELESS	GA	TELEPHONE	
MOVEON.ORG POLITICAL ACTION	2/8/21	199.99	GELLER, SETH	DC	STAFF REIMBURSEMENT	
REPUBLICAN NATIONAL COMMITTEE	10/13/21	199.99	HEB PHARMACY	TX	OFFICE SUPPLIES	
REPUBLICAN NATIONAL COMMITTEE	2/2/22	199.99	UBER	CA	TRAVEL EXPENSES	
REPUBLICAN PARTY OF BEXAR COUNTY	10/22/21	199.99	GO DADDY	AZ	BROWSER WEBSITE EXPENSE.	Administrative/Salary/Overhead Expenses
REPUBLICAN PARTY OF SAN DIEGO COUNTY	3/16/22	199.99	STRIPE	CA	MERCHANT FEES	Administrative/Salary/Overhead Expenses
RUSS FULCHER FOR IDAHO	5/24/21	199.99	COSTCO WHOLESALE	ID	BOOKKEEPING SOFTWARE	Administrative/Salary/Overhead Expenses
RUSS FULCHER FOR IDAHO	5/26/21	199.99	JOHNSON, JULIE SUZANNE	ID	BOOKKEEPING SOFTWARE	Administrative/Salary/Overhead Expenses
SUSIE LEE FOR CONGRESS	4/15/22	199.99	POLLEY, ALEX	NV	VENDORS THAT AGGREGATE ABOVE \$200 LISTED BELOW	

EXHIBIT E



W SOUTH BEACH

2201 Collins Avenue, Miami Beach, Florida 33139 USA

+1 305-938-3000



4.2

1660 Reviews

Currency Calculator

EXCLUSIVE AMENITIES

Mobile Key

Digital Check-In

Mobile Dining

Service Request

Spa

Dates

Wed, Oct 4, 2023 – Thu, Oct 5, 2023

Rooms & Guests

1 Room : 1 Adult

EDIT

Please note - Upon early departure, an Early Departure Charge of one night room and applicable tax applies.

Please note - A daily resort fee of USD 50 plus tax will be added to the room rate and includes 2 beach chairs, 1 beach umbrella, Internet access and more.

Standard Rates

Most Flexible

From 814 USD / night

Prepay and Save

With Restrictions

From 774 USD / night

Deals and Packages

Special Savings

From 853 USD / night

To book an accessible room, select a room type first.



Show rates with taxes and all fees

Splendid Studio, Suite, 1 King, Balcony

Room Details



Prepay Non-refundable Non-changeable

- Prepay in full
- Non-refundable if cancelled more than 1 day after booking
- No changes

Rate Details

853

774 USD / night

Taxes and all fees included

SELECT

Prepay Non-refundable Non-changeable

- Includes breakfast
- Prepay in full
- Non-refundable if cancelled more than 1 day after booking
- No changes
- See Rate details

Rate Details

853

817 USD / night

Taxes and all fees included

SELECT

EXHIBIT F

From: CLEAR Member Care <memberservices@clearme.com>
Date: Wednesday, January 4, 2023 at 2:02 PM
To: Roger Wieand <RWieand@campaignlegalcenter.org>
Subject: CLEAR - Membership Inquiry



Hi Roger,

Thank you for contacting CLEAR!

The standard annual membership cost is \$189.

We also have a family plan that allows members to add family or friends to their plan for an additional \$60.00 each year per member for up to 3 members.

Children under the age of 18 can use CLEAR for free when they are accompanied by a traveling CLEAR member, so there's no need to add them to your membership or have them add a picture of their eyes and fingerprints.

To learn more about CLEAR, please visit clearme.com/support.

We hope to see you in the CLEAR Lane soon!

Best,

Erik L.
CLEAR Member Services
www.clearme.com/support