BEFORE THE FEDERAL ELECTION COMMISSION

CAMPAIGN LEGAL CENTER
1101 14th Street NW, Suite 400
Washington, DC 20005
(202) 736-2200

v. MUR No. ______

RONALD D. DESANTIS
PO Box 3696
Tallahassee, FL 32315

FRIENDS OF RON DESANTIS¹
and NANCY H. WATKINS in her
official capacity as treasurer
610 S. Boulevard
Tampa, FL 33606

COMPLAINT

1. Florida Governor Ron DeSantis, a 2024 presidential candidate, and Friends of Ron DeSantis, his state PAC in Florida, have violated federal campaign finance laws by directing or transferring over $80 million to Never Back Down, a federal super PAC that was reportedly organized to act as the primary outside spending vehicle backing DeSantis’s 2024 presidential campaign, and has already spent over $944,000 for that purpose.

2. For over twenty years, the Federal Election Campaign Act (“FECA”) has prohibited federal candidates like DeSantis, along with their agents and entities they establish, finance, maintain, or control, from spending “soft money” — including, e.g., money raised by nonfederal committees and organizations that are not subject to federal

¹ On May 15, 2023, Friends of Ron DeSantis changed its name to “Empower Parents PAC,” see Empower Parents PAC, Statement of Org. at 1 (May 15, 2023) (attached as Ex. A), but this complaint refers to the PAC using its name from January 5, 2018, through May 15, 2023, a period that encompasses the events at issue. Moreover, as explained herein, this name change appears to have been part of a broader effort to obscure the PAC’s connection to DeSantis.
campaign finance laws — in connection with a federal election. The transfer of this colossal sum from a state PAC that DeSantis established and used to raise over $225 million, to a federal committee that has spent, and plans to continue spending, millions of dollars supporting DeSantis’s own campaign is a brazen attempt to circumvent the federal campaign finance rules that are crucial to preventing corruption and establishing transparency about how our federal elections are financed.

3. This complaint is filed pursuant to 52 U.S.C. § 30109(a)(1) and is based on information and belief that DeSantis and Friends of Ron DeSantis have 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.”

FACTUAL BACKGROUND

Ron DeSantis Became a Candidate for President by March 10, 2023.

4. Ron DeSantis, the current governor of Florida, recently declared himself to be a 2024 presidential candidate. DeSantis was first elected governor of Florida in 2018, and he won reelection in November 2022. He is barred, under Florida’s constitution, from seeking a third term as governor in 2026.

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2 52 U.S.C. § 30109(a)(2) (emphasis added); see also 11 C.F.R. § 111.4(a).
3 Ron DeSantis for President, Statement of Org. at 1 (May 24, 2023); see Nicholas Nehamas, Ron DeSantis Joins 2024 Race, Hoping to Topple Trump, N.Y. Times (May 24, 2023), https://www.nytimes.com/2023/05/24/us/politics/ron-desantis-2024-presidential-election.html (“[DeSantis] retains a host of strengths[, including] . . . a mountain of cash, a robust campaign operation, and a series of conservative policy victories in Florida after a landslide re-election triumph last fall.”).
4 See Fla. Const. art. IV, § 5 (“No person who has, or but for resignation would have, served as governor or acting governor for more than six years in two consecutive terms shall be elected governor for the succeeding term.”).
5. While DeSantis filed a 2024 Statement of Candidacy with the Commission and designated a principal authorized campaign committee, Ron DeSantis for President, on May 24, 2023, publicly available information indicates that DeSantis had, under FECA, already become a federal candidate before that point, as detailed below.

6. The available information indicates that DeSantis had decided to become a presidential candidate by March 10, 2023, and his actions throughout March and April 2023 show that he was no longer contemplating candidacy but had decided to run for president.

7. The *Washington Post* reported on March 10, 2023, that DeSantis “has indicated privately that he intends to run for president.” Per the report, while “[a]llies do not expect him to announce a run until after the Florida state legislative session ends in May[,] . . . in recent conversations, DeSantis has described his presidential plans without any caveats that would suggest he’s still deciding.”

8. DeSantis and his senior advisers were, by early April 2023, “already plotting out a strategy to run against Donald Trump for the long haul” in the 2024 Republican presidential nominating contests, and a “DeSantis political adviser said there have been internal conversations about delegate strategy.”

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7 *Id.*

8 Henry J. Gomez & Matt Dixon, *Ron DeSantis’ long-haul strategy against Trump comes into view*, NBC News (Apr. 6, 2023), [https://www.nbcnews.com/politics/2024-election/ron-desantis-long-haul-strategy-trump-comes-view-rena78141](https://www.nbcnews.com/politics/2024-election/ron-desantis-long-haul-strategy-trump-comes-view-rena78141) (“Florida Gov. Ron DeSantis’s team is already plotting out a strategy to run against Donald Trump for the long haul. The plan focuses less on making a quick splash in places like Iowa or New Hampshire and more on outlasting the former president in a battle for Republican convention delegates. Even though it’s early and DeSantis isn’t officially a candidate yet, in talks behind the scenes, an expanded map is viewed as one of the keys to victory, three sources close to the governor said. . . . Another DeSantis political adviser said there have been internal conversations about delegate strategy. Staffers expected to lead the effort include Ryan Tyson, a longtime Florida...
9. In mid-April 2023, DeSantis began “quietly assembling a senior staff for an expected 2024 presidential campaign” and, indeed, “some of the senior staff have started to move in recent weeks to the campaign’s base in Tallahassee . . . as DeSantis prepares to announce his presidential ambitions.”

10. Prior to this, DeSantis engaged in an extended period of fundraising, as well as domestic and foreign travel, to build a presidential war chest and publicly present himself as a viable presidential candidate.

11. For over a year, beginning during DeSantis’s 2022 gubernatorial reelection campaign and extending through May 5, 2023, when he took steps to distance himself from his state PAC, DeSantis actively raised money through Friends of Ron DeSantis, in amounts unprecedented for a gubernatorial reelection campaign. Numerous observers viewed this extraordinary fundraising — clearly unnecessary for DeSantis to secure reelection in the run-up to the 2020 general, and then blatantly unnecessary after he had already won, particularly since he cannot seek a third term as governor under Florida law — as intended for a future presidential candidacy:

   a. As early as April 2022, DeSantis had already raised over $100 million and broken the fundraising record for a non-self-funded gubernatorial candidate.

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9 Hugo Lowell, *DeSantis assembles senior staff for expected 2024 presidential campaign*, The Guardian (Apr. 27, 2023), [https://www.theguardian.com/us-news/2023/apr/27/ron-desantis-2024-presidential-campaign-staff](https://www.theguardian.com/us-news/2023/apr/27/ron-desantis-2024-presidential-campaign-staff) (“The senior staff roster effectively outlines a leadership team of around eight people as DeSantis looks to finalize his campaign operation ahead of a 2024 announcement that could come as early as the first two weeks of May or as late as July, one of the people said. . . . The campaign’s ambition is to reach a headcount of around 80 people by the time DeSantis announces.”).

while at the same time spending relatively little of that sum to advance his gubernatorial reelection campaign.\textsuperscript{11}

b. Shortly before Florida’s 2022 gubernatorial primary election, an August 2022 report noted that DeSantis, who was “running unopposed in Tuesday’s primary as he goes for a second term, has amassed $142 million from the start of 2021 through Aug. 5 [of] this year from donors including the hedge fund billionaires Ken Griffin and Paul Tudor Jones.”\textsuperscript{12}

c. By the November 2022 general election, in which DeSantis was easily reelected by nearly twenty points,\textsuperscript{13} he had spent around $100 million on his reelection and still had over $90 million on hand.\textsuperscript{14}

d. By February 2023, DeSantis was actively raising money for an undeclared presidential candidacy: he hosted “an event for top donors and social-media influencers” that he reportedly had been courting to support and finance his 2024 presidential campaign. News reports at the time indicated that “[a]bout

\textsuperscript{11}See Steve Contorno, \textit{Ron DeSantis has raised more than $100 million for his reelection bid. Could he use that money in a presidential race?}, CNN (July 5, 2022), https://www.cnn.com/2022/07/05/politics/ron-desantis-campaign-finance-2024-election/index.html (“At the end of May, DeSantis was sitting on $111 million — more money than any candidate has ever needed to win an election in the Sunshine State. More donations come in almost every day. . . . DeSantis has spent $7 million this year between his campaign and political committee.”).

\textsuperscript{12}Bill Allison & Mark Niquitte, \textit{DeSantis Taps Donors Griffin, Tudor Jones in $142 Million Haul}, Bloomberg (Aug. 22, 2022), https://www.bloomberg.com/news/articles/2022-08-22/desantis-taps-donors-griffin-tudor-jones-in-142-million-haul#xj4y7vzkg; see Matt Dixon, \textit{DeSantis draws huge cash haul from Trump donors}, Politico (June 19, 2022), https://www.politico.com/news/2022/06/19/desantis-cash-trump-donors-00040659 (“A DeSantis-aligned political committee, Friends of Ron DeSantis, has received $3.4 million this election cycle from 10 donors who collectively spent $24 million on Trump’s reelection bid. Most of the high-dollar donors had never given contributions in state-level Florida elections. . . . DeSantis has already raised more than $100 million — a record setting pace for a single election cycle in Florida — and is an overwhelming favorite to win reelection this year, a victory that could leave him with a huge war chest as the 2024 election cycle begins.”).


\textsuperscript{14}Matt Dixon, \textit{‘De facto frontrunner’: DeSantis’ $200 million haul positions him for 2024 run}, Politico (Nov. 3, 2022), https://www.politico.com/news/2022/11/03/desantis-record-breaking-haul-positions-him-for-2024-00065046 (“DeSantis has more than $90 million remaining in the bank after spending about $100 million total this election cycle on his reelection bid via his aligned committee and campaign.”).
150 guests are expected to attend the three-day event at the Four Seasons resort in Palm Beach, Florida, including wealthy Republican donors and conservative social-media influencers whom DeSantis’s camp has courted in recent months ahead of a widely expected presidential run.”

12. DeSantis has traveled extensively around the country for months, reportedly under the guise of promoting a recent book, while effectively promoting himself as a viable candidate for the presidency, including visiting states with early presidential nominating contests like Iowa, New Hampshire, and Nevada:

   a. Over President’s Day weekend (February 18-20, 2023), DeSantis visited New York, Philadelphia, and Chicago in events designed to “appeal[ ] to embattled police officers and crime-concerned citizens” by “pledging more support for law enforcement and vowing to battle liberal-minded criminal justice reforms.” These events were coupled with an influx of fundraising, with “seven-figure checks arriv[ing] ahead of what has amounted to a late-February soft launch of DeSantis’ highly anticipated run for president.”

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17 Steve Contoro, *DeSantis gets 7-figure checks from top GOP donors as he soft launches presidential campaign*, CNN (updated Feb. 22, 2023), https://www.cnn.com/2023/02/22/politics/ron-desantis-donors/index.html. (“The seven-figure checks arrived ahead of what has amounted to a late-February soft launch of DeSantis’ highly anticipated run for president. On Monday, DeSantis held campaign-style rallies with police officers in New York, Philadelphia and Chicago, where he regaled the crowds with stories of the culture wars. . . . The continued financial support from wealthy donors — achieved without actually declaring himself a candidate — explains, in part, why DeSantis is content to remain on the sidelines.”).
b. On March 3 and 4, 2023, DeSantis spoke at events in Houston and Dallas, Texas, including at the “Dallas County Republican Party’s Reagan Day Dinner,” where attendees noted that his remarks “resembled a campaign stump speech” that served as “an effective list of his state-level accomplishments.” Also in early March, DeSantis appeared at events in Nevada and California; at the latter, he delivered a “campaign stump speech” detailing his public policy stances.

c. DeSantis visited Iowa on March 10, 2023 — not long after presidential candidates or potential candidates Nikki Haley and Tim Scott visited the state — and held an event co-hosted by Iowa’s governor, to “begin courting Iowa’s Republican caucus voters in person.”

d. DeSantis later made additional visits to Iowa, New Hampshire, and South Carolina — *i.e.*, the states that presidential candidates routinely visit early in

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18 See Patrick Svitek, *Ron DeSantis proclaims Texas, Florida partners against “woke” left in Houston speech*, Texas Tribune (Mar. 4, 2023), [https://www.texastribune.org/2023/03/04/ron-desantis-houston-speech-woke/](https://www.texastribune.org/2023/03/04/ron-desantis-houston-speech-woke/) ("DeSantis’ remarks at the annual Harris County Lincoln Reagan Dinner were part of a two-day swing through Texas that included a similar event Saturday for the Dallas County GOP. The events come as DeSantis increasingly travels outside Florida in advance of an anticipated bid against former President Donald Trump for the Republican presidential nomination.")

19 Knowles & Stanley-Becker, *supra*.


each presidential election cycle because they hold early presidential
nominating contests — as well as states crucial to securing electoral college
votes in a general election, like Ohio and Virginia.23

13. After his domestic proto-campaign tour, beginning on April 25, 2023, DeSantis traveled
overseas, visiting Japan, South Korea, Israel and the United Kingdom, ostensibly to
promote international trade, but with a clear goal of promoting his viability as a
presidential candidate by “bolster[ing] his foreign policy credentials.”24 As observers
have noted, “[s]uch tours are a rite of passage for presidential candidates,” particularly
for candidates that have a perceived “foreign policy experience deficit.”25

14. DeSantis has raised and spent far more than $5,000 to advance his 2024 presidential
candidacy. DeSantis’s fundraising, as well as the vast amount spent to support DeSantis’s
travel to de facto presidential campaign events, plainly exceeded $5,000. Reports indicate
that DeSantis’s travel and related expenses have been paid for by “independent” groups,

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23 Nick Robertson, Protesters interrupt DeSantis speech at New Hampshire fundraising event, The Hill (Apr. 15,
fundraising-event/ (“DeSantis was headlining the Amos Tuck Dinner, a key fundraising event for the New
Hampshire Republican Party. The governor has recently traveled to a number of states in the leadup to a likely
presidential campaign announcement. Thursday he attended a GOP fundraiser in Ohio and earlier Friday addressed
Liberty University in Virginia.”).

24 David Jackson, ‘A heck of an ally’: DeSantis begins world tour by praising Japan, bristling at Trump rivalry,
presidential-contender-japan/11727835002/ (“Florida Gov. Ron DeSantis kicked off a four-nation tour meant to
bolster his foreign policy credentials by touting the role of Japan in a ‘tough neighborhood’ and dismissing questions
about his rivalry with former President Donald Trump.”); see Hannah Knowles, Politics stops at the water’s edge?
desantis-international-trip-2024/ (“For close watchers of DeSantis, it was a familiar talking point as he makes
moves toward entering the Republican presidential race against Donald Trump and others — and one that reinforced
the domestic political overtones of his international trip this week. Japan was DeSantis’s first stop on an
“international trade mission” for Florida that gives the governor a chance to boost his foreign policy credentials
heading into a presidential contest.”).

25 Julian Borger, Ron DeSantis to meet UK ministers on tour to boost foreign policy credentials, The Guardian
tour-to-boost-foreign-policy-credentials (“Ron DeSantis is due to spend Friday in Britain on the last leg of a world
tour aimed at enhancing his foreign policy credentials before an expected run for the Republican nomination. . . . the
timing of DeSantis’s tour, which has also included Japan, South Korea and Israel, has been dictated by the brewing
primary contest with Donald Trump.”).
including private jets paid for by “rich allies” as well as And To The Republic, “a Michigan-based nonprofit . . . [that] formed in late January as Mr. DeSantis was beginning to test the national waters and quickly became a critical part of his warm-up campaign. It organized nearly a dozen speaking events featuring the governor in at least eight states.”

15. Indeed, even after DeSantis had clearly decided to run for president, his state committee, Friends of Ron DeSantis, continued raising millions of dollars, taking in over $3.8 million in the two-month period between March 1, 2023, and April 30, 2023. This continued, extraordinary fundraising, following DeSantis’s sweeping reelection victory in November 2022, is particularly notable in light of DeSantis’s inability, under the Florida constitution, to seek a third term as governor.

DeSantis Transfers Soft Money From His State PAC to a Federal Super PAC Formed to Support His Presidential Run

16. Friends of Ron DeSantis is a state PAC that registered in Florida on January 5, 2018. Nancy H. Watkins has been the committee’s treasurer since its formation. On its original statement of organization, Friends of Ron DeSantis listed DeSantis under “candidate or other individual that this committee is supporting.”

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26  Alexandra Berzon and Rebecca Davis O’Brien, Air DeSantis: The Private Jets and Secret Donors Flying Him Around, N.Y. Times (May 20, 2023), https://www.nytimes.com/2023/05/20/us/politics/desantis-private-jets-donors.html (“Ahead of an expected White House bid, Mr. DeSantis has relied heavily on his rich allies to ferry him around the country to test his message and raise his profile. Many of these donors are familiar boosters from Florida, some with business interests before the state, according to a New York Times review of Mr. DeSantis’s travel. Others have been shielded from the public by a new nonprofit.”).
28  Supra note 4.
17. On January 5, 2018, the same day that the Friends of Ron DeSantis registered in Florida, DeSantis filed a “Statement of Solicitation” with respect to Friends of Ron DeSantis that provided, under “Relationship Between Office Holder or Candidate and Organization” — “Established/Maintain.”

18. DeSantis withdrew his statement of solicitation authorizing Friends of Ron DeSantis to raise funds on his behalf on May 5, 2023 — i.e., just 19 days before publicly announcing his presidential campaign, and after over five years of authorizing the state PAC to raise money on his behalf, during which time it raised over $225 million for him.

19. Three days later, on May 8, 2023 — after DeSantis had already been a presidential candidate for several weeks — Blaise Ingoglia, a Florida state legislator, was named Friends of Ron DeSantis’s chairperson and filed a statement of solicitation authorizing Friends of Ron DeSantis to raise funds on his behalf. Ingoglia’s statement provides, under “Relationship Between Office Holder or Candidate and Organization” — “Maintain/Control.”

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32 Statement of Solicitation, Ron DeSantis (Jan. 5, 2018) (attached as Ex. D). The instructions at the bottom of this form specify: “The Governor, Lieutenant Governor, members of the Cabinet, state legislators, or candidates for such offices who directly or indirectly solicit, cause to be solicited, or accept any contribution on behalf of an organization that is exempt from taxation under s. 527 or s. 501 (c)(4) of the Internal Revenue Code, which such individuals, in whole or in part, establish, maintain, or control, must file Form DS-DE 102.” Id. (emphasis added).

33 Letter from Gov. Ron DeSantis to Bureau of Election Records, Florida Sec’y of State (May 5, 2023) (enclosing January 2018 statement of solicitation) (attached as Ex. E) (“I am no longer associated with the political committee and do not directly or indirectly solicit, cause to be solicited, or accept any contributions on its behalf.”).

34 Statement of Solicitation, Blaise Ingoglia (May 8, 2023) (attached as Ex. F).

35 Id.
On May 15, 2023, the week before DeSantis filed his Statement of Candidacy and publicly announced that he was running for President on Twitter,36 Friends of Ron DeSantis officially changed its name to “Empower Parents PAC.”37

At least until April 15, 2023, the home page of Friends of Ron DeSantis’s official website listed DeSantis as its “Associated Person.”38 The same webpage, https://friendsofrondesantis.com, now redirects to https://empowerparentspac.com, the page for “Empower Parents PAC,” which is the new name for the PAC formerly known as Friends of Ron DeSantis.39 The page now lists Ingoglia as its “Associated Person.”40

Overall, Friends of Ron DeSantis has reported raising over $225 million, of which it has spent just over $140 million, leaving it with an approximate cash-on-hand balance of over $85 million as of May 24, 2023.41

Never Back Down Inc. (“Never PAC”) is a federal independent-expenditure only political committee (“IEOPC”) — commonly referred to as a “super PAC” — that registered with the Commission on February 23, 2023. Its treasurer is Cabell Hobbs.42
of May 24, 2023, Never PAC has reported spending over $944,000 on independent expenditures supporting DeSantis’s 2024 presidential candidacy.43

24. Reports indicate that on or after May 1, 202344 — i.e., after DeSantis had already decided to run for president, and raised or spent more than $5,000 toward that end — Friends of Ron DeSantis has contributed, or will soon contribute, over $80 million to Never PAC:

   a. On May 24, 2023, the same day that DeSantis finally acknowledged his candidacy, Never PAC confirmed that it has received or will soon receive $80 million from Friends of Ron DeSantis, and that the super PAC had factored that major contribution — comprising 40% of its budget — into their plans: The New York Times reported that “[t]op officials with the pro-DeSantis group, a super PAC called Never Back Down, provided their most detailed account yet of their battle plan to aid Mr. DeSantis” and that “[t]he group said it expected to have an overall budget of at least $200 million, including more than $80 million to be transferred from an old DeSantis state political account.”45

   b. Indeed, for weeks before DeSantis’s candidacy announcement, Never PAC officials had reportedly been “telling donors they intend to push the bounds”

44 State campaign finance reports filed by Friends of Ron DeSantis indicate that it had not yet directed or transferred the money as of April 30, 2023. See Friends of Ron DeSantis Campaign Finance Activity, supra (attached as Ex. I).
45 Shane Goldmacher, Jonathan Swan & Maggie Haberman, DeSantis Allies’ $200 Million Plan for Beating Trump, N.Y. Times (May 24, 2023); see Ben Kamisar, Ron DeSantis raked in big money for his re-election. Here’s how he can use it in 2024, NBC News (May 24, 2023) (“The governor’s state political committee, Friends of Ron DeSantis, had at least $86 million in the bank at the end of April . . . DeSantis’s political operation will direct that money to his supportive super PAC thanks to a gray area of federal campaign finance law. It’s a huge boon for DeSantis, whose Never Back Down super PAC has plans to raise and spend about $200 million and finance a huge ground game.”).
of super PAC support, laying out plans to raise and spend “about $200 million” to support DeSantis’s presidential campaign, including “the more than $85 million that DeSantis has in a state fundraising account,” i.e., Friends of Ron DeSantis.46

25. Never PAC has been using and/or reportedly intends to use this soft money in connection with a federal election by making over $944,000 in independent expenditures supporting DeSantis.47

**SUMMARY OF THE LAW**

26. Under FECA, a “candidate” is defined as “an individual who seeks nomination for election, or election, to Federal office” and crosses the statutory threshold of receiving aggregate contributions, or making aggregate expenditures, in excess of $5,000.48

27. Federal candidates must file a written statement designating a principal campaign committee within fifteen days of becoming a candidate.49

28. FECA requires that the funds federal candidates and officeholders raise and spend in connection with federal elections comply with federal campaign finance laws. The Bipartisan Campaign Reform Act of 2002 (“BCRA”) amended FECA to prohibit federal candidates and officeholders, their agents, and any entities that they directly or indirectly establish, finance, maintain or control from raising or spending funds in connection with

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47 Independent Expenditures, Never Back Down Inc., [https://www.fec.gov/data/independent-expenditures/?data_type=processed&most_recent=true&q_spender=C00834077&is_notice=true](https://www.fec.gov/data/independent-expenditures/?data_type=processed&most_recent=true&q_spender=C00834077&is_notice=true) (viewed May 24, 2023).

48 52 U.S.C. § 30101(2); see 11 C.F.R. § 100.3.

49 52 U.S.C. § 30102(e)(1); see 11 C.F.R. § 101.1(a).
a federal election outside of FECA’s contribution limits, source prohibitions, and reporting requirements — *i.e.*, so-called “soft money.”

29. Specifically, FECA provides, in relevant part:

A candidate, individual holding Federal office, agent of a candidate or an individual holding Federal office, or an entity directly or indirectly established, financed, maintained or controlled by or acting on behalf of 1 or more candidates or individuals holding Federal office, shall not — (A) solicit, receive, direct, transfer, or spend funds in connection with an election for Federal office, including funds for any Federal election activity, unless the funds are subject to the limitations, prohibitions, and reporting requirements of this Act.

30. As such, FECA prohibits federal candidates and officeholders, their agents, and any entities that they directly or indirectly establish, finance, maintain or control — entities including nonfederal committees not subject to FECA — from soliciting, receiving, directing, or transferring funds in connection with a federal election that are not subject to federal campaign finance laws.

31. Although federal court decisions have invalidated some of FECA’s source prohibitions and amount limitations, as applied to IEOPCs, those decisions left intact BCRA’s statutory amendments mandating that federal candidates and officeholders cannot “solicit, receive, direct, transfer, or spend” soft money in connection with federal elections, and those requirements thus remain in effect, as the Commission itself has clearly recognized.

32. In Advisory Opinion 2011-12 (Majority PAC), the Commission explicitly reaffirmed that BCRA, codified at 52 U.S.C. § 30125 *et seq.*, “remains valid” after *Citizens United* and

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51 52 U.S.C. § 30125(e)(1); *see* 11 C.F.R. § 300.61.
52 *SpeechNow v. FEC*, 599 F.3d 686, 689 (D.C. Cir. 2010); *see also* *Citizens United v. FEC*, 558 U.S. 310 (2010).
SpeechNow: “[BCRA] was enacted by Congress long after [FECA’s] contribution limits and source prohibitions. It was upheld by the Supreme Court in McConnell v. FEC, 540 U.S. 93, 181-184 (2003), and remains valid since it was not disturbed by either Citizens United or SpeechNow.”

In that advisory opinion, the Commission stated that federal candidates cannot lawfully solicit funds on an IEOPC’s behalf that are beyond FECA’s contribution limits, source prohibitions, and reporting requirements.

Accordingly, even after Citizens United and SpeechNow, FECA clearly prohibits federal candidates and officeholders, their agents, and any other entities that they directly or indirectly establish, finance, maintain or control, from directing or transferring contributions raised outside FECA’s contribution limits and source prohibitions, and/or aggregating more than $5,000 per year, to an IEOPC.

CAUSE OF ACTION

COUNT I:

deSantis and Friends of Ron deSantis Violated 52 U.S.C. § 30125(e)(1)(A) By Directing or Transferring Over $80 Million to Never PAC

The available information supports finding reason to believe that DeSantis, a federal candidate, and Friends of Ron DeSantis, a state PAC registered in Florida that DeSantis “directly or indirectly established, financed, maintained or controlled” during his federal candidacy, violated FECA by directing or transferring over $80 million, either directly or through an agent, from Friends of Ron DeSantis to Never PAC, a federal IEOPC, in connection with a federal election.

54 Id. at 3-4.
55 See 52 U.S.C. §§ 30116(a)(1)(C) (providing a $5,000 per year contribution limit for non-connected political committees), 30125(e)(1)(A).
35. There is ample information indicating that DeSantis had decided to run for president, and raised or spent well in excess of the $5,000 threshold amount to qualify as a “candidate” under FECA, well before the soft money transfer and his public announcement of his candidacy on May 24, 2023.

36. Available evidence strongly indicates that DeSantis had decided to run for president at least by March 10, 2023, when the Washington Post reported that DeSantis “has indicated privately that he intends to run for president” and while “[a]llies do not expect him to announce a run until after the Florida state legislative session ends in May[,] . . . in recent conversations, DeSantis has described his presidential plans without any caveats that would suggest he’s still deciding.” These statements, attributed to those in DeSantis’s inner circle, support the conclusion that by March 10, 2023 — weeks before any public acknowledgement that he was running and the transfer of soft money to Never PAC — DeSantis was no longer weighing or deliberating whether to run for president, but had instead decided to run. Indeed, this report and others cited the end of Florida’s state legislative session in May 2023 as a marker for when DeSantis would announce the decision he had already made.

37. DeSantis took additional actions, in April 2023, that support the conclusion he had decided to run for president: DeSantis and his senior advisers were, by early April 2023, “already plotting out a strategy to run against Donald Trump for the long haul” in the 2024 Republican presidential nominating contests, and a “DeSantis political adviser said there have been internal conversations about delegate strategy.” Likewise, in mid-April

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56 Knowles & Stanley-Becker, supra note 6.
57 Id.
58 Gomez & Dixon, supra note 8.
2023, DeSantis began “quietly assembling a senior staff for an expected 2024 presidential campaign” and, indeed, “some of the senior staff have started to move in recent weeks to the campaign’s base in Tallahassee . . . as DeSantis prepares to announce his presidential ambitions.”

38. These tangible steps — outlining campaign strategy, building a campaign staff, and developing a campaign infrastructure — are generally inconsistent with someone still deciding whether to run for federal office, and instead support the conclusion that DeSantis had already decided to run for president and was advancing that goal, even before publicly acknowledging his status as a federal candidate or complying with FECA’s requirements for candidates.

39. DeSantis’s fundraising further reinforces the conclusion that he had decided to seek federal office well before publicly acknowledging that decision: As detailed above, beginning in 2022 during his gubernatorial reelection campaign and through at least the end of April 2023, months after he had been reelected, DeSantis used Friends of Ron DeSantis to raise massive amounts of money — far in excess of what he needed to win reelection. Indeed, the fundraising and spending numbers bear this out: by the date of the 2022 election, DeSantis had raised over $200 million, a record-shattering amount for a gubernatorial campaign, spent merely half of that (around $100 million), and thus retained cash on hand (in Friends of Ron DeSantis) of over $90 million — money plainly intended to seek the presidency in 2024. Indeed, DeSantis was barred under Florida state law from running for a third consecutive term as governor.

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60 *Supra* note 4.
40. This extraordinary and unprecedented fundraising supports the conclusion that DeSantis was building a war chest for a 2024 presidential campaign, not for any state office. For comparison, although the Commission’s “testing the waters” regulations, which govern pre-candidacy exploratory activities, exempt from the definitions of “contribution” and “expenditure” any money raised and spent by individuals determining whether to run for federal office, they also provide that this exemption “does not apply to funds received for activities indicating that an individual has decided to become a candidate for a particular office or for activities relevant to conducting a campaign,” and an indicator that someone has made the decision to become a candidate includes, e.g., “rais[ing] funds in excess of what could reasonably be expected to be used for exploratory activities or undertak[ing] activities designed to amass campaign funds that would be spent after” becoming a candidate. “Rais[ing] funds in excess” perfectly describes DeSantis’s fundraising activities during the 2022 election cycle.

41. It is patently clear that DeSantis, by raising over $200 million through November 2022, — of which over $90 million remained untouched by the end of the 2022 election — was not merely fundraising for his 2022 reelection campaign, but was “amass[ing] campaign funds that would be spent” after becoming a federal candidate, an indicator that he had, in fact, already decided to run for president in 2024.

42. Moreover, months after the 2022 election had ended, DeSantis was actively raising money and courting wealthy donors and influencers for an as-yet-undeclared presidential campaign, including at a February 2023 event in Palm Beach, Florida, featuring over 150

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61 11 C.F.R. § 100.72(a).
62 Id. § 100.72(b).
63 Id. § 100.72(b)(2).
64 Dixon, supra note 14.
guests.\textsuperscript{65} This high-profile event to court donors and influencers, while seeking to raise millions of dollars, provides further support for the conclusion that DeSantis was not merely deciding but had \textit{already decided} to run for president in 2024.

43. In addition, DeSantis’s domestic and international travel between February and April of 2023 further bolsters the conclusion that he had decided to run for president and was essentially campaigning for that office, including by extolling his prior accomplishments, making the case for himself as a viable candidate, and burnishing his foreign policy experience, under the pretense of promoting a recent book and fostering trade relations.

44. From February 2023 through April 2023, DeSantis made stops across the country — including in states with early primaries and caucuses like Iowa, New Hampshire, and South Carolina, as well as states crucial to securing a general election victory, like Ohio and Virginia, where DeSantis gave a campaign stump speech listing his accomplishments and vision for the country — effectively making an early pitch for a presidential campaign platform to potential supporters.\textsuperscript{66} This nationwide self-promotion tour, which is \textit{de rigueur} for presidential candidates, supports the conclusion that DeSantis had already decided to run for president and was actively promoting his candidacy and raising funds for his campaign.

45. DeSantis’s recent international visits to Japan, South Korea, Israel and the United Kingdom likewise served as an opportunity for him to look and act the part of a president interacting with foreign allies for potential supporters — another commonplace practice for presidential candidates, particularly those without well-established foreign policy

\textsuperscript{65} Oliphant, \textit{supra} note 15.

\textsuperscript{66} \textit{Supra} notes 16–23.
experience — thus again supporting the conclusion that he had already decided to seek
the presidency.67

46. News reports and publicly available disclosure reports show that DeSantis has raised or
spent far more than FECA’s threshold amount of $5,000 — through a combination of
money raised by Friends of Ron DeSantis as well as outside funding for his travel — to
support his 2024 candidacy.68

47. Even if these activities, viewed in isolation, might not independently indicate that
DeSantis had decided to run for president, viewed as a whole, the overall record —
including his astounding levels of fundraising, extensive travel for campaign-style events,
and campaign hiring and planning activities — support finding reason to believe that
DeSantis had decided to seek federal office by March 10, 2023, i.e., several weeks before
his public announcement of candidacy, and clearly before the over $80 million dollar
transfer from Friends of Ron DeSantis to Never PAC.

48. Moreover, based on DeSantis’s campaign fundraising through Friends of Ron DeSantis,69
as well as the reported payment of travel costs to de facto campaign events by outside
donors, which would result in excessive and unreported in-kind contributions to his
campaign, it is clear that DeSantis had raised and spent well in excess of $5,000, the
statutory threshold for federal candidate status, before his announcement and the
transfer.70

49. Because DeSantis had both decided to run for federal office and raised or spent more than
$5,000 in contributions or expenditures, he became a federal candidate by March 10,

67 See supra notes 24–25.
68 See supra notes 26–27.
69 See supra note 27.
2023, and was thereafter required to abide by FECA’s restrictions on federal candidates— and any entities that they directly or indirectly establish, finance, maintain, or control— raising or spending “soft money” in connection with a federal election.71

50. Friends of Ron DeSantis is a nonfederal committee, a state PAC registered in Florida, that DeSantis, in official statements filed with Florida authorities, has acknowledged establishing, financing, maintaining, or controlling throughout virtually the entire period of the PAC’s existence and during the five-year period that it raised over $225 million— of which $86 million remained as of May 1, 2023— in support of his state campaigns in Florida.72

51. Indeed, on January 5, 2018— the same day that Friends of Ron DeSantis registered in Florida as a state PAC— DeSantis filed a statement of solicitation authorizing the PAC to raise money to support his 2018 campaign for Florida governor.73 As part of that statement, DeSantis acknowledged that his “relationship” to the organization was that he had “established/maintain[ed]” Friends of Ron DeSantis.74

52. DeSantis kept that authorization in place for over five years, using Friends of Ron DeSantis as a vehicle to raise over $225 million on his behalf during that period, including the very funds directed or transferred to Never PAC. Only after deciding to run for president in 2024, and after raising all of that money, which was subject to Florida law and not FECA’s requirements, did DeSantis— with his public announcement of a presidential candidacy only days away— withdraw his solicitation statement and

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71 See 52 U.S.C. § 30125(e).
72 See supra notes 29–32, 41.
73 Statement of Solicitation, Ron DeSantis (Jan. 5, 2018) (attached as Ex. D).
74 Id.
publicly distance himself from Friends of Ron DeSantis. In fact, the letter DeSantis sent to withdraw his solicitation statement explicitly stated, “I am no longer associated with the political committee and do not directly or indirectly solicit, cause to be solicited, or accept any contributions on its behalf” — confirming that DeSantis had, up to that point, been associated with Friends of Ron DeSantis and had been soliciting, causing to be solicited, and/or accepting contributions on the state PAC’s behalf.

53. To further create the appearance of distance between DeSantis and Friends of Ron DeSantis, Blaise Ingoglia, the state PAC’s new chairman, filed a new statement of solicitation on May 8, 2023, that indicated he maintained or controlled the organization, in contrast to DeSantis’s 2018 solicitation statement, which indicated that DeSantis “Established/Maintain[ed]” the state PAC.

54. Friends of Ron DeSantis’s website, moreover, had long explicitly listed DeSantis as the “Associated Person” on whose behalf the state PAC raised funds, right up until DeSantis — as a clear prelude to publicly announcing his presidential campaign — withdrew his authorization, at which point the state PAC’s website changed the “Associated Person” featured on its home page to Ingoglia, its new chairperson.

55. In a further effort to whitewash the state PAC, on May 15, 2023, Friends of Ron DeSantis changed its name to “Empower Parents PAC” and, with the change in the state PAC’s name, the website was altered entirely, thus eradicating any mention of its origins as an

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75 Letter from Gov. Ron DeSantis to Bureau of Election Records, Florida Sec’y of State (May 5, 2023).
76 Id. (emphasis added).
77 Statement of Solicitation, Blaise Ingoglia (May 8, 2023) (attached as Ex. F).
78 See supra notes 38–40.
entity that DeSantis established to raise over $225 million for his state-level campaigns.\textsuperscript{79} A casual observer of the website would be unable to glean any connection to DeSantis.

56. These eleventh-hour, pretextual moves to distance DeSantis from Friends of Ron DeSantis — strategic actions clearly taken in view of an imminent public acknowledgement of his federal candidacy — do not alter the fact that DeSantis “established, financed, maintained, or controlled” the state PAC (even after he had become a federal candidate), or that the funds it raised are “soft money” that do not comport with FECA’s requirements. Indeed, DeSantis has acknowledged that he established and maintained the state PAC during the over-five-year period in which Friends of Ron DeSantis raised over $225 million for him, per his signed statement of solicitation filed with Florida authorities.\textsuperscript{80}

57. Moreover, the whitewashing of Friends of Ron DeSantis on the eve of DeSantis’s announcement of candidacy provides further support for the conclusion that DeSantis had previously decided to run for president, and deliberately delayed announcing that decision to evade compliance with FECA’s requirements, including its soft money prohibitions — an obvious, and ineffectual, attempt to avoid complying with the law, at the cost of voters’ interests.

58. Accordingly, there is ample information to establish that throughout the more-than-five-year period that Friends of Ron DeSantis raised $225 million for DeSantis, of which over $80 million was transferred to a federal super PAC, DeSantis had established, financed, maintained, or controlled Friends of Ron DeSantis.

\textsuperscript{79} Id.
\textsuperscript{80} Supra note 32.
59. As a state PAC registered in Florida, raising funds subject only to Florida law, none of the money that Friends of Ron DeSantis raised was subject to FECA’s contribution limits, source prohibitions, and reporting requirements.

60. On or after May 1, 2023, Friends of Ron DeSantis directed or transferred over $80 million to Never PAC, a federal IEOPC.\textsuperscript{81} Never PAC has already begun spending funds in connection with a federal election, making over $944,000 in independent expenditures supporting DeSantis.\textsuperscript{82}

61. Based on the foregoing, there is reason to believe that DeSantis and Friends of Ron DeSantis, an entity that DeSantis directly or indirectly established, financed, maintained, or controlled, violated 52 U.S.C. § 30125(e)(1)(A) by directing or transferring — either directly or through an agent — over $80 million that did not comply with FECA’s contribution limits, source prohibitions, and reporting requirements, to Never PAC, in connection with a federal election.

\textsuperscript{81} \textit{Supra} notes 45–46.
\textsuperscript{82} \textit{Supra} note 47.
PRAYER FOR RELIEF

62. Wherefore, the Commission should find reason to believe that DeSantis and Friends of Ron DeSantis violated 52 U.S.C. § 30101 et seq., and conduct an immediate investigation under 52 U.S.C. § 30109(a)(2).

63. 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

Saurav Ghosh, Esq.
Campaign Legal Center
1101 14th Street NW, Suite 400
Washington, DC 20005
Counsel to the Campaign Legal Center

May 30, 2023
VERIFICATION

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


For Complainant Campaign Legal Center

Saurav Ghosh, Esq.

Sworn to and subscribed before me this 24th day of May 2023.

Notary Public

KAYLA A NOLASCO
NOTARY PUBLIC
REG. # 7993702
COMMONWEALTH OF VIRGINIA
MY COMMISSION EXPIRES JANUARY 31, 2026
**STATEMENT OF ORGANIZATION OF POLITICAL COMMITTEE**

(PLEASE TYPE)

***AMENDED STATEMENT***

1. **Full Name of Committee**
   Empower Parents PAC (70275)

   **Telephone**
   (813) 254-3369

   **Mailing Address (include city, state and zip code)**
   610 South Boulevard, Tampa, FL 33606

   **Street Address (include city, state and zip code)**
   610 South Boulevard, Tampa, FL 33606

2. **Affiliated or Connected Organizations (includes other committees of continuous existence and political committees)**

<table>
<thead>
<tr>
<th>Name of Affiliated or Connected Organization</th>
<th>Mailing Address</th>
<th>Relationship</th>
</tr>
</thead>
<tbody>
<tr>
<td>None</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

3. **Area, Scope and Jurisdiction of the Committee**
Statewide political committee supporting or opposing statewide, legislative, multi-county, county, and municipal candidates and/or issues and any other activities not prohibited by Chapter 106, Florida Statutes.

4. **Nature of Organization or Organization's Special Interest (e.g., medical, legal, education, etc.)**
   Political

5. **Identify by Name, Address and Position, the Custodian of Books and Accounts (include treasurer's name)**

<table>
<thead>
<tr>
<th>Full Name</th>
<th>Mailing Address</th>
<th>Committee Title or Position</th>
</tr>
</thead>
<tbody>
<tr>
<td>Nancy H. Watkins</td>
<td>610 South Boulevard</td>
<td>Treasurer</td>
</tr>
<tr>
<td></td>
<td>Tampa, FL 33606</td>
<td></td>
</tr>
</tbody>
</table>

DS-DE 5 (Rev. 06/11) – Rule 1S-2.017

(continued on reverse side)
6. List by Name, Address and Position, Other Principal Officers, Including Officers and Members of the Finance Committee, If Any (include chairman's name)

<table>
<thead>
<tr>
<th>Full Name</th>
<th>Mailing Address</th>
<th>Committee Title or Position</th>
</tr>
</thead>
<tbody>
<tr>
<td>Blaise Ingoglia</td>
<td>610 South Boulevard</td>
<td>Chairperson</td>
</tr>
<tr>
<td></td>
<td>Tampa, FL 33606</td>
<td></td>
</tr>
<tr>
<td>Robert I. Watkins</td>
<td>610 South Boulevard</td>
<td>Deputy Treasurer</td>
</tr>
<tr>
<td></td>
<td>Tampa, FL 33606</td>
<td></td>
</tr>
</tbody>
</table>

7. List by Name, Address, Office Sought and Party Affiliation Each Candidate or Other Individual that this Committee is Supporting (If none, please indicate)

<table>
<thead>
<tr>
<th>Full Name</th>
<th>Mailing Address</th>
<th>Office Sought</th>
<th>Party</th>
</tr>
</thead>
<tbody>
<tr>
<td>TBD</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

8. List Any Issues this Committee is Supporting: None at this time.

List Any Issues this Committee is Opposing: None at this time.

9. If this Committee is Supporting the Entire Ticket of a Party, Give Name of Party

N/A

10. In the Event of Dissolution, What Disposition will be Made of Residual Funds?
Contribute to candidates, political committees, party committees, other political organizations exempt under IRC Section 527, charitable organizations, or any other activities or disposition not prohibited by law.

11. List all Banks, Safety Deposit Boxes, or Other Depositories Used for Committee Funds

<table>
<thead>
<tr>
<th>Name of Bank or Depository &amp; Account Number</th>
<th>Mailing Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>The Bank of Tampa</td>
<td>601 Bayshore Blvd.</td>
</tr>
<tr>
<td></td>
<td>Tampa, FL 33606</td>
</tr>
</tbody>
</table>

12. List all Reports Required to be Filed by this Committee with Federal Officials and the Names, Addresses and Positions of Such Officials, If Any

<table>
<thead>
<tr>
<th>Report Title</th>
<th>Dates Required to be Filed</th>
<th>Name &amp; Position of Official</th>
<th>Mailing Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>Form 8871</td>
<td>Upon formation</td>
<td>For all: Internal Revenue</td>
<td>For all: Ogden UT 84201</td>
</tr>
<tr>
<td>Form 1120POL</td>
<td>March 15 of each year</td>
<td>Service Center</td>
<td></td>
</tr>
<tr>
<td>Form 990, as may be</td>
<td>May 15 of each year</td>
<td></td>
<td></td>
</tr>
<tr>
<td>required</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

STATE OF Florida

Hernando COUNTY

Blaise Ingoglia, certify that the information in this Statement of Organization is complete, true and correct.

X

Signature of Chairman of Political Committee

05/15/23 Date
HAND DELIVERED

Ms. Donna S. Brown
Chief, Bureau of Election Records
Florida Department of State
R.A. Gray Building, Room 316
500 South Bronough Street
Tallahassee, FL 32399-0250

RE: Political Committee (70275) Amended Statement of Organization

Dear Ms. Brown:

Enclosed please find an Amended Statement of Organization for the political committee, Friends of Ron DeSantis (70275) submitted in accordance with section 106.03(4), Florida Statutes. Among the changes reflected in the Amended Statement of Organization is that the political committee’s name has been changed to Empower Parents PAC. Please update the Division’s records accordingly.

Sincerely,

[Signature]
Blaise Ingoglia
Chairman

cc: Nancy Watkins, Treasurer
**STATEMENT OF ORGANIZATION OF POLITICAL COMMITTEE**

(please type)

1. **Full Name of Committee**
   Friends of Ron DeSantis

   **Telephone** 904-359-2000

   **Mailing Address (include city, state and zip code)**
   One Independent Drive, Suite 1300
   Jacksonville, FL 32202

   **Street Address (include city, state and zip code)**
   One Independent Drive, Suite 1300
   Jacksonville, FL 32202

2. **Affiliated or Connected Organizations (includes other committees of continuous existence and political committees)**

<table>
<thead>
<tr>
<th>Name of Affiliated or Connected Organization</th>
<th>Mailing Address</th>
<th>Relationship</th>
</tr>
</thead>
<tbody>
<tr>
<td>None</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

3. **Area, Scope and Jurisdiction of the Committee**

   Statewide political committee to support statewide candidate or other activity not prohibited by Chapter 106 F.S.

4. **Nature of Organization or Organization's Special Interest (e.g., medical, legal, education, etc.)**

   Political

5. **Identify by Name, Address and Position, the Custodian of Books and Accounts (include treasurer’s name)**

<table>
<thead>
<tr>
<th>Full Name</th>
<th>Mailing Address</th>
<th>Committee Title or Position</th>
</tr>
</thead>
<tbody>
<tr>
<td>Erika E. Alba</td>
<td>One Independent Drive, Suite 1300</td>
<td>Treasurer</td>
</tr>
<tr>
<td></td>
<td>Jacksonville, FL 32202</td>
<td></td>
</tr>
</tbody>
</table>
6. List by Name, Address and Position, Other Principal Officers, Including Officers and Members of the Finance Committee, If Any (include chairman's name)

<table>
<thead>
<tr>
<th>Full Name</th>
<th>Mailing Address</th>
<th>Committee Title or Position</th>
</tr>
</thead>
<tbody>
<tr>
<td>Erika E. Alba</td>
<td>One Independent Drive, Suite 1300</td>
<td>Chair</td>
</tr>
<tr>
<td>Brad Herold</td>
<td>Jacksonville, FL 32202</td>
<td>Deputy Treasurer</td>
</tr>
<tr>
<td></td>
<td>One Independent Drive, Suite 1300</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Jacksonville, FL 32202</td>
<td></td>
</tr>
</tbody>
</table>

7. List by Name, Address, Office Sought and Party Affiliation Each Candidate or Other Individual that this Committee is Supporting (if none, please indicate)

<table>
<thead>
<tr>
<th>Full Name</th>
<th>Mailing Address</th>
<th>Office Sought</th>
<th>Party</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ron DeSantis</td>
<td>One Independent Drive, Suite 1300</td>
<td>Governor</td>
<td>Republican</td>
</tr>
<tr>
<td></td>
<td>Jacksonville, FL 32202</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

8. List Any Issues this Committee is Supporting: None
   List Any Issues this Committee is Opposing: None

9. If this Committee is Supporting the Entire Ticket of a Party, Give Name of Party
   n/a

10. In the Event of Dissolution, What Disposition will be Made of Residual Funds?
    Contribute to candidates, political parties, political committees or other activities not prohibited by law.

11. List all Banks, Safety Deposit Boxes, or Other Depositories Used for Committee Funds

<table>
<thead>
<tr>
<th>Name of Bank or Depository &amp; Account Number</th>
<th>Mailing Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>SunTrust Bank</td>
<td>76 S. Laura Street</td>
</tr>
<tr>
<td></td>
<td>Jacksonville, FL 32202</td>
</tr>
</tbody>
</table>

12. List all Reports Required to be Filed by this Committee with Federal Officials and the Names, Addresses and Positions of Such Officials, If Any

<table>
<thead>
<tr>
<th>Report Title</th>
<th>Dates Required to be Filed</th>
<th>Name &amp; Position of Official</th>
<th>Mailing Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>Form 8871</td>
<td>Upon formation</td>
<td>Internal Revenue Service</td>
<td>Ogden, UT 84201</td>
</tr>
<tr>
<td>Form 1120-POL</td>
<td>March 15, annually</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Form 990, as may be required</td>
<td>May 15, annually</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

STATE OF Florida Duval COUNTY

I, Erika E. Alba, certify that the information in this Statement of Organization is complete, true and correct.

Signature of Chairman of Political Committee          Date 2018
Ms. Kristi Bronson  
Division of Elections  
RA Gray Building, Suite 316  
500 S. Bronough Street  
Tallahassee, FL 32399

Re: Formation Documents for the Political Committee Entitled “Friends of Ron DeSantis”

Dear Ms. Bronson:

Enclosed please find formation documents (DS-DE 5, DS-DE 6, and DS-DE 41) for creation of the political committee entitled Friends of Ron DeSantis.

Please do not hesitate to contact me if you have any further questions regarding this submission.

Sincerely,

[Signature]

Erika E. Alba  
Counsel

EEA:
EXHIBIT C
**APPOINTMENT OF CAMPAIGN TREASURER AND DESIGNATION OF CAMPAIGN DEPOSITORY FOR POLITICAL COMMITTEES**  
(Sections 106.011(1) and 106.021(1), F.S.)

CHECK APPROPRIATE BOX:

- [ ] Original Appointment of Treasurer  
- [x] Reappointment of Treasurer  
- [ ] Deputy Treasurer

<table>
<thead>
<tr>
<th>1. Committee or Organization</th>
<th>2. Telephone</th>
</tr>
</thead>
<tbody>
<tr>
<td>Friends of Ron DeSantis</td>
<td>(813) 254-3369</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>3. Name of Treasurer or Deputy Treasurer</th>
<th>4. Email (optional)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Nancy H. Watkins</td>
<td><a href="mailto:nwatkins@robertwatkins.com">nwatkins@robertwatkins.com</a></td>
</tr>
</tbody>
</table>

6. Mailing Address

610 S. Boulevard, Tampa FL 33606

7. Street Address

610 S. Boulevard, Tampa FL 33606

8. The following bank has been designated as the  

- [x] Primary Depository  
- [ ] Secondary Depository

9. Name of Bank

The Bank of Tampa

10. Street Address

601 Bayshore Blvd.

11. City  

Tampa

12. State  

FL

13. Zip Code  

33606

14. Signature of Chairman  

[X]

15. Name of Chairman (Print or Type)

Robert I. Watkins

**Campaign Treasurer's Acceptance of Appointment**

Nancy H. Watkins  

(Please Print or Type)  

treasurer or deputy treasurer for

Friends of Ron DeSantis  

(Committee or Organization)

UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING CAMPAIGN TREASURER'S ACCEPTANCE OF APPOINTMENT AND THAT THE FACTS STATED ARE TRUE.

8/21/18 Date  

Signature of Campaign Treasurer or Deputy Treasurer

DS-DE 8 (Rev. 7/10)
EXHIBIT D
**PART A**

- **Office Holder:** (Choose One)
- **Candidate:** Governor

<table>
<thead>
<tr>
<th>Name</th>
<th>Telephone</th>
<th>Email Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ron DeSantis</td>
<td>(904) 359-2000</td>
<td><a href="mailto:Elalba@foley.com">Elalba@foley.com</a></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Mailing Address</th>
<th>State</th>
<th>Zip Code</th>
</tr>
</thead>
<tbody>
<tr>
<td>One Independent Drive, Suite 1300</td>
<td>Florida</td>
<td>32202</td>
</tr>
</tbody>
</table>

**Name of Organization**
Friends of Ron DeSantis

**PART B**

- Relationship Between Office Holder or Candidate and Organization: Established/Maintain
- Organization Type: 527

**PART C**

- Web Address as Required by Section 106.0701(3), F.S. (if website has not been created, put "To be determined") www.FriendsOfRonDeSantis.com

**PART D**

- Date: 3 Jan 2018
- Signature of Office Holder or Candidate

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**INSTRUCTIONS FOR COMPLETING AND FILING FORM DS-DE 102**

**STATEMENT OF SOLICITATION**

**Introductory Information**

As this form utilizes drop-down menus, you must enter the information directly on the form prior to printing. After printing, sign the document. Fax or mail PAGE 1 of the form to the Division of Elections, Bureau of Election Records, R. A. Gray Building, Room 316, 500 South Bronough Street, Tallahassee, Florida 32399-0250; Fax Number 850-245-6259.

**Who Must File Form DS-DE 102**

The Governor, Lieutenant Governor, members of the Cabinet, state legislators, or candidates for such offices who directly or indirectly solicit, cause to be solicited, or accept any contribution on behalf of an organization that is exempt from taxation under s. 527 or s. 501(c)(4) of the Internal Revenue Code, which such individuals, in whole or in part, establish, maintain, or control, must file Form DS-DE 102.
EXHIBIT E
May 5, 2023

HAND DELIVERED

Ms. Donna S. Brown
Chief, Bureau of Election Records
Florida Department of State
R.A. Gray Building, Room 316
500 South Bronough Street
Tallahassee, FL 32399-0250

Re: Withdrawal of Statement of Solicitation- Friends of Ron DeSantis
(70275)

Dear Ms. Brown:

Pursuant to this letter, I hereby withdraw my Statement of Solicitation for the political committee, Friends of Ron DeSantis. I am no longer associated with the political committee and do not directly or indirectly solicit, cause to be solicited, or accept any contributions on its behalf. Please update the Division's records accordingly.

Sincerely,

[Signature]

Ron DeSantis
Governor
STATEMENT OF
SOLICITATION
(Section 106.0701, Florida Statutes)

Office Use Only
Tracking ____________________________
Account ____________________________

PART A
☑ Office Holder: Legislator □ Candidate: (Choose One)

Name
Blaise Ingoglia

Telephone
(813) 254-3369

Mailing Address
610 South Boulevard

Email Address
blaise.ingoglia.fl@gmail.com

City
Tampa

State
Florida

Zip Code
33606

Name of Organization
Friends of Ron DeSantis

PART B
Relationship Between Office Holder or Candidate and Organization
(in whole or in part): Maintain/Control
Organization Type:
527

PART C
Web Address as Required by Section 106.0701(3), F.S. (if website has not been created, put "To be determined")
www.friendsofrondesantis.com

PART D
5/8/2023
Date
Signature of Office Holder or Candidate

INSTRUCTIONS FOR COMPLETING AND FILING FORM DS-DE 102
STATEMENT OF SOLICITATION

Introductory Information
As this form utilizes drop-down menus, you must enter the information directly on the form prior to printing. After printing, sign the document. Fax or mail PAGE 1 of the form to the Division of Elections, Bureau of Election Records, R. A. Gray Building, Room 316, 600 South Bronough Street, Tallahassee, Florida 32399-0250; Fax Number 850-245-6259.

Who Must File Form DS-DE 102
The Governor, Lieutenant Governor, members of the Cabinet, state legislators, or candidates for such offices who directly or indirectly solicit, cause to be solicited, or accept any contribution on behalf of an organization that is exempt from taxation under s. 527 or s. 501(c)(4) of the Internal Revenue Code, which such individuals, in whole or in part, establish, maintain, or control, must file Form DS-DE 102.
EXHIBIT G
Friends of Ron DeSantis is a statewide political committee that is committed to advancing the Freedom Agenda and keeping Florida free.

Sponsored by Friends of Ron DeSantis, 610 S. Boulevard, Tampa, FL 33606.
Use of military rank, job title, and photograph in uniform does not imply endorsement by the Department of Defense.
EXHIBIT H
PROTECT PARENTAL RIGHTS IN EDUCATION

First Name   Last Name
Email

ADD YOUR NAME

Empower Parents PAC supports the advancement of issues and candidates committed to protecting parental rights in education.

Associated Person: Blaise Ingoglia

Privacy Policy

Sponsored by Empower Parents PAC, 610 S. Boulevard, Tampa, FL 33606.
EXHIBIT I
### Empower Parents PAC

#### Campaign Finance Activity

*Note: The information presented below was obtained from the Committee's/Candidate's Campaign Treasurer's Report filed with the Division of Elections. About the Campaign Finance Data Base. If all contributions for a reporting period are less than 1 dollar Then they may not be displayed.*

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<th>Other</th>
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Note: (E) indicates that report was filed electronically
* X Indicates that detail has not been released
* W Indicates that a waiver was filed and L Indicates that a loan report was filed

Select Detail Type: 
- Contributions

Select Sort Order: 
- Date (Ascending)

Select Output Type: 
- Display On Screen

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