

BEFORE THE FEDERAL ELECTION COMMISSION

CAMPAIGN LEGAL CENTER
SOPHIA GONSALVES-BROWN
1101 14th Street NW, Suite 400
Washington, DC 20005

v. MUR No. _____

RED CURVE SOLUTIONS, LLC
138 Conant St., Suite 401
Beverly, MA 01915

DONALD J. TRUMP FOR PRESIDENT
2024, INC. and BRADLEY T. CRATE in
his official capacity as treasurer;
TRUMP SAVE AMERICA JOINT
FUNDRAISING COMMITTEE and
BRADLEY T. CRATE in his official
capacity as treasurer;
SAVE AMERICA and BRADLEY T.
CRATE in his official capacity as treasurer
P.O. Box 509
Arlington, VA 22216

TRUMP MAKE AMERICA GREAT
AGAIN COMMITTEE and BRADLEY T.
CRATE in his official capacity as treasurer;
MAKE AMERICA GREAT AGAIN PAC
and BRADLEY T. CRATE in his official
capacity as treasurer
P.O. Box 13570
Arlington, VA 22219

COMPLAINT

1. Since December 2022, five political committees authorized by or affiliated with former president Donald Trump—including Trump’s 2024 presidential campaign and his leadership PAC, Save America—have reported over \$7.2 million in payments described as “reimbursements for legal” costs or expenses to Red Curve Solutions, LLC (“Red Curve”), a compliance firm run by Bradley T. Crate, who serves as the treasurer for each of the committees. The descriptions of these disbursements appear to indicate that Red

Curve routinely advanced money or paid for the cost of legal services provided by other vendors, for which Red Curve was reimbursed by the committees. This apparent payment scheme, however, violates the reporting requirements of the Federal Election Campaign Act (“FECA”), which requires that committees provide detailed information about who they are paying for services, and how much they are paying for those services. Moreover, to the extent Red Curve advanced the funds needed to cover, or paid for, these legal services, such advances or payments by Red Curve appear to have violated FECA’s contribution limits and prohibitions.

2. Accordingly, as set forth herein, there is reason to believe these five committees—Donald J. Trump for President 2024, Inc. (the “Trump 2024 Campaign”), Trump Save America Joint Fundraising Committee (the “Trump JFC”), Save America, Trump Make America Great Again Committee (the “Trump MAGA Committee”), and Make America Great Again PAC (“MAGA PAC”) (collectively, the “Trump-affiliated Committees”)—and Bradley T. Crate in his official capacity as treasurer of each committee, violated their reporting obligations under FECA, *see* 52 U.S.C. § 30104; and that Red Curve made excessive or prohibited corporate contributions, *see* 52 U.S.C. §§ 30116(a)(1)(A) and (C), 30118(a).
3. This complaint is filed pursuant to 52 U.S.C. § 30109(a)(1) and is based on information and belief that Red Curve, the Trump 2024 Campaign, the Trump JFC, Save America, the Trump MAGA Committee, and MAGA PAC have violated and may continue to violate 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.”¹

FACTUAL BACKGROUND

4. Red Curve is a Massachusetts domestic limited liability company (“LLC”) managed by Crate and first organized in 2009 under the name “Crate Consulting Group, LLC.”² Crate serves as the treasurer for each of the Trump-affiliated Committees at issue in this complaint, as well as for over 200 other federal candidates or political committees.³ Red Curve’s 2023 annual report states—under “general character of the business . . . [or] service to be rendered”—that the LLC provides “comprehensive treasury, budgeting, and FEC compliance services for political campaigns, party organizations, and PACs.”⁴
5. Donald J. Trump for President 2024, Inc. registered with the Commission as Trump’s authorized 2024 presidential campaign committee on November 15, 2022, and Crate is its treasurer.⁵
6. Save America is Trump’s leadership PAC, which registered with the Commission on November 9, 2020, and Crate is its treasurer.⁶

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

² MA Sec’y of the Commonwealth, Corps. Div., Business Entity Summary, “Red Curve Solutions, LLC,” <https://corp.sec.state.ma.us/CorpWeb/CorpSearch/CorpSummary.aspx?sysvalue= bxY09qtee3UOfVtHzELZYuPRucDAh6d6Zg0COji43c-> (last visited Apr. 23, 2024) (attached as Exhibit A) (indicating that Crate serves as Red Curve’s “Manager” and that its original name was “Crate Consulting Group, LLC”); *see* Cert. of Org., “Crate Consulting Group, LLC,” (Aug. 10, 2009) (attached as Exhibit B).

³ Committees with Most Recent Treasurer “Bradley T. Crate” or “Bradley Crate,” https://www.fec.gov/data/committees/?treasurer_name=Crate (last visited Apr. 23, 2024) (indicating that Crate is the most recent treasurer for 215 federal committees).

⁴ Red Curve Solutions, LLC, 2023 Annual Report (Aug. 3, 2023) (all caps in original) (attached as Exhibit C).

⁵ Donald J. Trump for President 2024, Inc., Statement of Org. at 1, 2 (Nov. 15, 2022), <https://docquery.fec.gov/pdf/243/202211159546802243/202211159546802243.pdf>.

⁶ Save America, Statement of Org. at 1, 5 (Nov. 9, 2020), <https://docquery.fec.gov/pdf/422/202011099336977422/202011099336977422.pdf>.

7. Trump Save America Joint Fundraising Committee is a joint fundraising committee that registered with the Commission on February 27, 2021.⁷ Crate is its treasurer, and it currently raises funds for both the Trump 2024 Campaign and Save America.⁸
8. Make America Great Again PAC originally registered with the Commission as Trump’s 2016 presidential campaign committee, Donald J. Trump for President, Inc.⁹ It is now a multicandidate PAC affiliated with the joint fundraising committees Trump MAGA Committee and Trump Victory, and Crate is its treasurer.¹⁰
9. Trump Make America Great Again Committee registered with the Commission as a joint fundraising committee on May 25, 2016, originally raising funds for Trump’s 2016 presidential campaign and for the Republican National Committee (“RNC”).¹¹ It currently raises funds for Save America, MAGA PAC, and the RNC, and Crate is its treasurer.¹²
10. Between December 7, 2022, and March 18, 2024, Red Curve received 108 disbursements from these five committees—virtually all of which are described as “Reimbursement Legal Fees” or “Reimbursement Legal Expenses”—totaling \$7,206,474.55. The

⁷ Trump Save America Joint Fundraising Comm., Statement of Org. at 1 (Feb. 27, 2021), <https://docquery.fec.gov/pdf/111/202102279429078111/202102279429078111.pdf>.

⁸ Trump Save America Joint Fundraising Comm., Amend. Statement of Org. at 2 (Apr. 22, 2024), <https://docquery.fec.gov/pdf/419/202404229636706419/202404229636706419.pdf>.

⁹ Donald J. Trump for President, Inc., Statement of Org. at 1, 2 (Jun. 29, 2015), <https://docquery.fec.gov/pdf/501/201506299000000501/201506299000000501.pdf>.

¹⁰ Make America Great Again PAC, Amend. Statement of Org. at 1–2, 5–6 (Nov. 17, 2022), <https://docquery.fec.gov/pdf/784/202211179546823784/202211179546823784.pdf>.

¹¹ Trump Make America Great Again Comm., Statement of Org. at 1, 2 (May 25, 2016), <https://docquery.fec.gov/pdf/030/201605259017296030/201605259017296030.pdf>.

¹² Trump Make America Great Again Comm., Amend. Statement of Org. at 1–2, 5 (Oct. 15, 2022), <https://docquery.fec.gov/pdf/755/202210159533171755/202210159533171755.pdf>.

aggregate reimbursement amounts that Red Curve received are detailed in the table below:¹³

Committee (Committee Type)	Recipient	Subtotal
DONALD J. TRUMP FOR PRESIDENT 2024, INC. (Principal Authorized Campaign Committee)	RED CURVE SOLUTIONS, LLC	\$28,275.00
MAKE AMERICA GREAT AGAIN PAC (Multicandidate PAC, Former Authorized Committee)	RED CURVE SOLUTIONS	\$3,822,812.51
SAVE AMERICA (Leadership PAC)	RED CURVE SOLUTIONS	\$2,851,533.16
TRUMP MAKE AMERICA GREAT AGAIN COMMITTEE (Joint Fundraising Committee)	RED CURVE SOLUTIONS	\$281,059.67
TRUMP SAVE AMERICA JOINT FUNDRAISING COMMITTEE (Joint Fundraising Committee)	RED CURVE SOLUTIONS	\$222,794.21
TOTAL		\$7,206,474.55

11. Per reporting in *The Daily Beast*, the \$7.2 million in aggregate disbursements to Red Curve would appear to make it “the largest single recipient of Trump’s legal payouts since he left office,”¹⁴ a conclusion that appears to be supported by FEC disclosure data.¹⁵ It is unclear from available information whether these payments were exclusively for Trump’s own legal costs, whether they include costs stemming from the representation of others linked to Trump or the Trump-affiliated Committees, or even whether they included payments for expenses unrelated to legal services.¹⁶

¹³ Disbursements to “Red Curve” described as “Reimbursement for Legal,” https://www.fec.gov/data/disbursements/?data_type=processed&recipient_name=Red+Curve&disbursement_description=Reimbursement+for+Legal (last visited Apr. 23, 2024).

¹⁴ Roger Sollenberger, *Trump’s New Legal Bills Are Hiding an \$8 Million Mystery*, *Daily Beast* (Apr. 24, 2024), <https://www.thedailybeast.com/trumps-new-legal-bills-are-hiding-an-dollar8-million-mystery>.

¹⁵ See, e.g., Disbursements to “Habba Madaio,” https://www.fec.gov/data/disbursements/?data_type=processed&recipient_name=Habba+Madaio (last visited Apr. 24, 2024) (disclosing \$6.85 million in total disbursements—all of which were paid by Save America or MAGA PAC—to Trump attorney Alina Habba’s law firm, Habba Madaio & Associates LLP); Disbursements to “Blanche Law,” https://www.fec.gov/data/disbursements/?data_type=processed&recipient_name=Blanche+Law (last visited Apr. 24, 2024) (disclosing \$3.35 million in total disbursements—all of which were paid by Save America—to Trump attorney Todd Blanche’s law firm, Blanche Law).

¹⁶ See Sollenberger, *supra* note 14 (“Notably, Trump has used those donations not just to pay for his own representation, but also more controversially to provide lawyers for an array of witnesses and co-defendants. The

SUMMARY OF THE LAW

Disbursement Reporting Requirements

12. FECA requires each treasurer of a political committee to file regular reports of receipts and disbursements with the Commission.¹⁷ Each report must provide, *inter alia*, itemized information regarding the name and address of each person to whom the committee makes an expenditure or other disbursement aggregating more than \$200 per election cycle, for a candidate-authorized committee, or per calendar year, for a non-candidate-authorized committee, as well as the date, amount, and purpose of such payments.¹⁸
13. A committee’s failure to itemize its disbursements leaves voters in the dark about the entities working for the committee, including the nature of and charges for the services provided, as well as the overall amount these entities are being paid—which denies voters their informational interest in knowing “where political campaign money comes from and how it is spent,”¹⁹ and undermines the bedrock transparency necessary for voters to meaningfully evaluate candidates and “make informed decisions.”²⁰ Failure to completely and accurately report disbursements also undermines compliance with and enforcement of other laws that protect voters and our electoral system, such as FECA’s ban on converting campaign funds to personal use,²¹ as well as the prohibition of coordination

Red Curve legal reimbursements would be a convenient way to conceal the names of unknown firms representing Trump or his allies.”).

¹⁷ 52 U.S.C. § 30104(a)(1); 11 C.F.R. § 104.1(a).

¹⁸ 52 U.S.C. § 30104(b)(5), (6); 11 C.F.R. § 104.3(b)(3)(i), (ix) (political committees other than authorized committees); *id.* § 104.3(b)(4)(i), (vi) (authorized committees); *id.* § 104.9(a), (b) (all political committees); *see id.* § 104.3(b)(3)(i) (“As used in 11 CFR 104.3(b)(3), *purpose* means a brief statement or description of why the disbursement was made.”).

¹⁹ *Buckley v. Valeo*, 424 U.S. 1, 66 (1976).

²⁰ *Citizens United v. FEC*, 558 U.S. 310, 370 (2010).

²¹ *See* 52 U.S.C. § 30114(b); 11 C.F.R. § 113.1(g).

between campaigns and outside spending groups—*e.g.*, super PACs and “dark money” 501(c)(4) groups—through common vendors or former employees.²²

14. In MUR 4872 (Jenkins), the Commission conciliated knowing and willful violations of FECA’s itemized disbursement disclosure requirement, *see* 52 U.S.C. § 30104(b)(5)(A), resulting from a scheme in which candidate Louis E. “Woody” Jenkins and his campaign committee, Jenkins for Senate 1996, acknowledged making payments through the campaign’s primary media vendor, Courtney Communications, to a different vendor, Impact Mail & Printing, which the campaign hired to perform computerized phone bank services—while disclosing only Courtney Communications as the recipient of these payments on its disclosure reports.²³ Jenkins admitted that he directed the payments to Impact Mail be made through Courtney Communications to avoid public disclosure of his campaign’s association with Impact Mail,²⁴ which was connected to the well-known white supremacist David Duke. The Commission’s conciliation agreement also noted that “Impact Mail was not an ‘ultimate vendor’ or sub vendor of Courtney Communications” because “Courtney had no involvement whatsoever with the services provided by Impact Mail[,] . . . [and, indeed,] Courtney’s only role in this matter was to serve as a conduit for payment to Impact Mail so as to conceal the transaction with Impact Mail.”²⁵
15. Similarly, in MUR 6800, the Commission found reason to believe the Ron Paul 2012 Presidential Campaign Committee knowingly and willfully violated 52 U.S.C.

²² *See* 11 C.F.R. §§ 109.20, 109.21(d)(4), (5).

²³ Conciliation Agreement ¶ V, MUR 4872 (Jenkins for Senate 1996, *et al.*) (Feb. 15, 2002), <https://www.fec.gov/files/legal/murs/4872/0000016F.pdf>.

²⁴ *Id.* ¶ IV.7 (“Jenkins acknowledges that Impact Mail provided the services to the Jenkins Committee . . . [and that] Jenkins decided to make disbursements for the services through Courtney Communications because he did not want his campaign to be associated with Impact Mail and did not want Impact Mail listed on the Jenkins Committee’s disclosure reports.”).

²⁵ *Id.* ¶ IV.9.

§§ 30104(b)(5)(A) and 30118(a) based on a scheme in which the committee used a corporate intermediary to funnel payments to an Iowa state legislator, Kent Sorenson, for purported services Sorenson provided to the committee, concluding that the corporate intermediary—much like the conduit media vendor in MUR 4872—had been used purely as a conduit to conceal the true purpose and recipient of the committee’s payments.²⁶

16. In a more recent example, Hillary Clinton’s 2016 presidential campaign, Hillary for America, and the Democratic National Committee (DNC) paid Fusion GPS for opposition research via the law firm Perkins Coie LLP (“Perkins”). The committees reported expenditures to Perkins for the purpose of “legal services” or “legal and compliance consulting.” The Commission conciliated both committees’ violations of FECA for misreporting these expenditures, which not only misled the public, but demonstrated the broad array of activities that committees attempt to conceal under the general description of disbursements for “legal” services.²⁷

Contribution Limits and Prohibitions

17. Under FECA, a contribution includes “any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for Federal office.”²⁸ “Anything of value” includes any in-kind contribution, including the provision of goods or services paid for by a third party.

²⁶ Factual and Legal Analysis at 7–10, MUR 6800 (Ron Paul 2012 Presidential Campaign Committee, Inc.), https://www.fec.gov/files/legal/murs/6800/6800_18.pdf.

²⁷ Conciliation Agreement, MURs 7291 and 7449 (Hillary for America) (Feb. 22, 2022), https://www.fec.gov/files/legal/murs/7291/7291_53.pdf; Conciliation Agreement, MURs 7291 and 7449 (DNC Servs. Corp./DNC) (Feb. 22, 2022), https://www.fec.gov/files/legal/murs/7291/7291_53.pdf.

²⁸ 52 U.S.C. § 30101(8)(A).

18. An advance to a political committee, while outstanding, is a contribution, unless an exemption applies.²⁹ One such exemption is for commercial vendors extending credit in the ordinary course of business and on terms “substantially similar to extensions of credit to nonpolitical debtors that are of similar risk and size obligation.”³⁰ In determining whether a vendor acts in the ordinary course of business, the Commission evaluates multiple factors, one of which is whether similar extensions of credit are “the usual and normal practice in the commercial vendor’s trade or industry.”³¹
19. FECA limits the amount per election that any person can contribute to a candidate’s authorized campaign committee,³² as well as the amount per year that any person can contribute to any committee other than a candidate-authorized committee or party committee,³³ *e.g.*, a leadership PAC or multicandidate PAC. FECA prohibits any candidate or committee from knowingly accepting a contribution in excess of these limits.³⁴
20. During the 2022 election cycle, the aggregate per-election contribution limit for candidates’ authorized campaign committees was \$2,900, and the aggregate per year contribution limit for all other committees was \$5,000.³⁵ During the 2024 election cycle, these limits are \$3,300 per election and \$5,000 per year, respectively.³⁶ The maximum

²⁹ *See id.*

³⁰ 11 C.F.R. § 116.3(a)-(b); Factual and Legal Analysis at 4, MUR 7343 (Highway 31).

³¹ *Id.* § 116.3(c)(3).

³² 52 U.S.C. § 30116(a)(1)(A).

³³ *Id.* § 30116(a)(1)(C).

³⁴ *Id.* § 30116(f).

³⁵ Contribution Limits for 2021–2022, FEC.gov, https://www.fec.gov/resources/cms-content/documents/contribution_limits_chart_2021-2022.pdf.

³⁶ Contribution Limits for 2023–2024, FEC.gov, https://www.fec.gov/resources/cms-content/documents/contribution_limits_chart_2023-2024.pdf.

amount a contributor may give to a joint fundraising committee is the total amount the contributor may give to all participants without exceeding any limits.³⁷

21. Furthermore, FECA prohibits any corporation from making a contribution, and prohibits any candidate or committee from knowingly accepting a corporate contribution.³⁸
22. Although federal court decisions have invalidated some of FECA’s source prohibitions and amount limitations as applied to committees or committee accounts exclusively used to make independent expenditures, FECA’s prohibitions and limitations still apply to candidates and their authorized campaign committees, as well as other committees that make contributions to candidate-authorized committees.³⁹

CAUSES OF ACTION

COUNT I:

THE TRUMP-AFFILIATED COMMITTEES VIOLATED FECA’S REPORTING REQUIREMENTS BY FAILING TO ACCURATELY DISCLOSE PAYMENTS FOR LEGAL EXPENSES

23. The available information provides reason to believe the Trump-affiliated Committees violated FECA by failing to provide complete and accurate disclosure information regarding millions of dollars in disbursements by those committees. Specifically, the fact that each of the five committees disclosed making disbursements to Red Curve described as “reimbursement for legal” fees or expenses suggests that Red Curve paid for or advanced funds to cover legal services, and that the committees later reimbursed Red Curve for procuring those services. This payment and reimbursement scheme resulted in the Trump-affiliated Committees’ disclosure reports failing to disclose—with the specific

³⁷ *Joint Fundraising with other Candidates and Political Committees*, FEC, <https://www.fec.gov/help-candidates-and-committees/joint-fundraising-candidates-political-committees/> (last visited Apr. 24, 2024).

³⁸ 52 U.S.C. § 30118(a).

³⁹ *SpeechNow v. FEC*, 599 F.3d 686, 689 (D.C. Cir. 2010); *see also Citizens United v. FEC*, 558 U.S. 310 (2010).

itemized information that FECA requires under 52 U.S.C. § 30104(b)(5)(A)—the committees’ respective actual expenditures for these legal fees or expenses.

24. The Trump-affiliated Committees collectively reported disbursing over \$7.2 million to Red Curve, with virtually all of these payments being described in their disclosure reports as “Reimbursement for Legal Fees” or “Reimbursement for Legal Expenses.”⁴⁰
25. As indicated both by publicly available information and its own corporate documents, Red Curve offers budgeting, compliance, and FEC reporting services, but does not appear to offer any sort of legal services.⁴¹ Bradley Crate, Red Curve’s founder and manager, is the treasurer for over 200 candidates and committees, including each of the Trump-affiliated Committees, but there is no publicly available information to indicate that he has ever provided legal services of any kind.⁴²
26. It therefore appears implausible that the \$7.2 million in payments to Red Curve described as “Reimbursement for Legal Fees” or “Reimbursement for Legal Services” were for legal services provided by Red Curve or Crate. Instead, the available facts suggest that these payments were, in fact, reimbursing Red Curve—as the disbursement descriptions state on their face—for legal services provided *by other vendors*, which Red Curve either previously paid for or served as a conduit for payments to the actual vendors.
27. There is thus reason to believe that the Trump-affiliated Committees’ failed to comply with FECA’s requirement that a committee must disclose “the name and address of each person to whom an expenditure in an aggregate amount or value in excess of \$200 within the calendar year is made” along with “the date, amount, and purpose of such operating

⁴⁰ See note 13, *supra*.

⁴¹ See *supra* ¶ 4.

⁴² *Id.*

expenditure.”⁴³ Indeed, under this payment scheme, the names and addresses of the vendors who actually provided the legal services that the Trump-affiliated Committees reimbursed Red Curve for were wholly obscured from public view, along with the dates, amounts, and purposes for the payments they received for those services. Instead, only Red Curve appears on the public record, despite the fact that Red Curve does not appear to have provided *any* legal services—let alone legal services valued at over \$7.2 million.

28. The apparent payment scheme at issue is strikingly similar to the scheme in MUR 4872, in which a candidate directed his campaign to pay a vendor, Impact Mail, through another vendor, Courtney Communications, despite the fact that the latter was merely a conduit for the payments to Impact Mail and played no role in providing the services for which the payments were made.⁴⁴ In conciliating knowing and willful violations of FECA, the candidate admitted that this payment scheme was intended to avoid disclosing Impact Mail as a vendor on his campaign’s disclosure reports, thus undermining the very transparency and accountability that FECA upholds by requiring the itemized disclosure of committee disbursements.
29. In MUR 4872, the Commission noted that Impact Mail was *not* an “ultimate” vendor or subvendor for Courtney; instead, Courtney’s only role was to serve as a conduit to conceal the campaign’s payments to Impact Mail. Likewise, here, there is no evidence indicating that an attorney or law firm acted as a subvendor to Red Curve in providing compliance services to the Trump-affiliated Committees. Rather, it appears that Red Curve was acting as a conduit to pay for unrelated services.

⁴³ 52 U.S.C. § 30104(b)(5)(A).

⁴⁴ See *supra* notes 23–24.

30. The payment scheme at issue here is also similar to the scheme in MUR 6800, which involved the use of a corporate intermediary to transmit payments from a campaign committee to a purported vendor, with the conduit's purpose being to conceal from public view the fact that the campaign was making such payments.⁴⁵
31. Similarly here, the payment-and-reimbursement scheme between the Trump-affiliated Committees and Red Curve has undermined, and continues to undermine, the public's informational interest in knowing how each of the five Trump-affiliated committees actually spent its money, including who each committee paid for legal services and how much each committee paid for such services. This apparent reporting failure is particularly concerning in light of the unprecedented amount that Trump has paid, through political committees controlled by him or his allies, for legal fees and expenses, which has drawn intense public scrutiny. Given what the DNC/Clinton campaign matters demonstrate—*i.e.*, that political committees sometimes use purpose descriptions like “legal fees” and “legal expenses” in broad and misleading ways—the FEC must act to clarify the public record.⁴⁶
32. Accordingly, there is reason to believe that each of the Trump-affiliated Committees and Crate in his official capacity as treasurer violated its reporting obligations under FECA, *see* 52 U.S.C. § 30104.

⁴⁵ *See supra* note 26.

⁴⁶ *See* Conciliation Agreement, MURs 7291 and 7449 (Hillary for America); Conciliation Agreement, MURs 7291 and 7449 (DNC Servs. Corp./DNC).

COUNT II:
**RED CURVE MADE, AND THE TRUMP-AFFILIATED COMMITTEES KNOWINGLY ACCEPTED,
PROHIBITED OR EXCESSIVE CONTRIBUTIONS BY PAYING THE TRUMP-AFFILIATED
COMMITTEES' LEGAL FEES**

33. The available information provides reason to believe Red Curve made excessive or prohibited corporate contributions to the Trump-affiliated Committees, which the committees knowingly accepted, based on Red Curve's apparent role in advancing, paying, or facilitating the payment of funds to cover the costs associated with legal services provided by other vendors, for which Red Curve—taking the committees' reported disbursements at face value—apparently received reimbursements from the Trump-affiliated Committees.
34. Under FECA, a contribution includes “anything of value” provided “for the purpose of influencing” a federal election. Through the apparent scheme in which Red Curve paid for or facilitated the payment of over \$7.2 million worth of legal services provided by other vendors, before later being reimbursed for those payments, Red Curve appears to have made “contributions” to the reimbursing committees—*i.e.*, it provided things “of value” to the committees for the requisite purpose of influencing a federal election.⁴⁷
35. Advancing, paying, or facilitating the payment of funds for legal fees and later being reimbursed does not appear to be consistent with Red Curve's usual business practices or the practices of any other compliance vendor. No other committee has reported reimbursing Red Curve for legal fees,⁴⁸ and across all FEC reports, reimbursements for

⁴⁷ 52 U.S.C. § 30101(8); *see also* 52 U.S.C. § 114.1(a)(1) (providing that for purposes of the corporate contribution prohibition, “the terms contribution and expenditure shall include any direct or indirect payment, distribution, loan, advance, deposit, or gift of money, or any services, or anything of value . . . to any candidate, political party or committee”).

⁴⁸ Disbursements to “Red Curve” described as “Legal,” https://www.fec.gov/data/disbursements/?data_type=processed&recipient_name=red+curve&disbursement_description=legal (last visited Apr. 24, 2024). One committee reported payments to Red Curve for “legal and compliance services,” but those expenditures (a) were not reimbursements, and (b) still appeared to be related to compliance, the service Red Curve offers. *See id.*

legal fees appear rare—and when they do occur, they are generally made directly to a law firm or a separate segregated fund’s connected organization, not a vendor acting as an intermediary.⁴⁹

36. Furthermore, in MUR 6800, the Commission found reason to believe a campaign committee knowingly and willfully violated FECA’s corporate contribution prohibition by using a corporate intermediary as a conduit to conceal the campaign’s payments to a state legislator contracted to provide services to the campaign.⁵⁰ Here, similarly, it appears that the Trump-affiliated Committees used an LLC, which may be treated as a corporation under the Commission’s regulations, as a conduit to conceal payments for legal services.
37. Although Red Curve is an LLC whose tax status is unknown, which means it is unclear, for FECA’s purposes, whether its contributions must be treated as corporate contributions,⁵¹ its contributions appear to have violated FECA regardless: If Red Curve has previously elected to be treated as a corporation for federal tax purposes, then its contributions violated FECA’s corporate contribution ban.⁵² If, instead, Red Curve has previously elected to be taxed as a partnership or treated as a tax-disregarded entity, its contributions would be attributable to the LLC or its member(s), or both, in which case its contributions plainly violated FECA’s contribution limits, since the aggregate value of

⁴⁹ Disbursements described as “Reimbursement of Legal” and “Reimbursement for Legal,” https://www.fec.gov/data/disbursements/?data_type=processed&disbursement_description=Reimbursement+for+Legal&disbursement_description=Reimbursement+of+Legal (last visited Apr. 24, 2024).

⁵⁰ See *supra* note 26.

⁵¹ See 11 C.F.R. § 110.1(g) (outlining attribution rules for contributions made by an LLC).

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

its payments for legal services—more than \$7.2 million over a period of roughly 16 months—far exceeded those limits.⁵³

38. Accordingly, there is reason to believe that Red Curve made prohibited or excessive contributions in violation of FECA.
39. The Trump-affiliated Committees likewise appear to have violated FECA by knowingly accepting these prohibited or excessive contributions. The apparent scheme at issue in this case involved reimbursing Red Curve over \$7.2 million in advances, payments, or the facilitation of payments to procure legal services between December 2022 and March 2024. Both the substantial sums at issue and the duration of the reimbursement scheme support the conclusion that each of the Trump-affiliated Committees knew that it was paying Red Curve for legal services that were, in fact, being provided by another vendor whose name would thereby be hidden from public view.
40. As such, there is reason to believe the committees knowingly accepted contributions from Red Curve that were either prohibited corporate contributions,⁵⁴ or contributions in excess of FECA’s relevant contribution limits—*i.e.*, contributions that vastly exceeded the limit of \$2,900 or \$3,300 per election for the Trump campaign, depending on the time of the payment, and \$5,000 per year or the JFC aggregate limit for the other four committees.⁵⁵

⁵³ 11 C.F.R. §§ 110.1(g)(2), (4), 110.1(e); *see* 52 U.S.C. § 30116(a)(1)(A), (C).

⁵⁴ *See* 52 U.S.C. § 30118(a).

⁵⁵ *See* 52 U.S.C. §§ 30116(a)(1)(A), (a)(1)(C), (f).

PRAYER FOR RELIEF

41. Wherefore, the Commission should find reason to believe that Red Curve, the Trump 2024 Campaign, the Trump JFC, Save America, the Trump MAGA Committee, and MAGA PAC violated 52 U.S.C. § 30101 *et seq.*, and conduct an immediate investigation under 52 U.S.C. § 30109(a)(2).
42. Further, the Commission should seek appropriate sanctions for any and all violations, including civil penalties sufficient to deter future violations and an injunction prohibiting the respondents from any and all violations in the future, and should seek 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/ Sophia Gonsalves-Brown
Sophia Gonsalves-Brown
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,
Sophia Gonsalves-Brown

April 24, 2024

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 Sophia Gonsalves-Brown

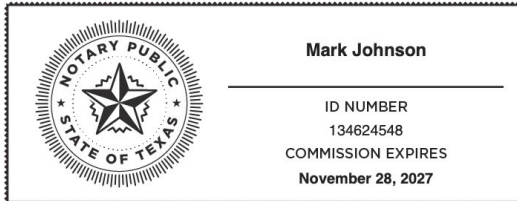
Sophia Elizabeth Gonsalves-Brown

Sophia Gonsalves-Brown

State of Texas
County of Tarrant

Sworn to and subscribed before me this 24th day of April 2024.

Mark Johnson
Notary Public, State of Texas
Notary Public



Electronically signed and notarized online using the Proof platform.

VERIFICATION

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

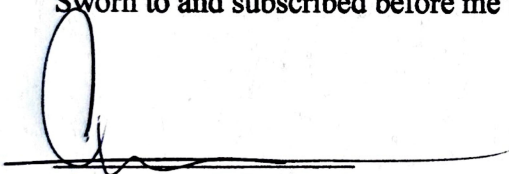
Sworn pursuant to 18 U.S.C. § 1001.

For Complainant Campaign Legal Center



Saurav Ghosh, Esq.

Sworn to and subscribed before me this 24th day of April 2024.



Notary Public



EXHIBIT A



Secretary of the Commonwealth of Massachusetts

William Francis Galvin

Business Entity Summary

ID Number: 270471971

[Request certificate](#)

[New search](#)

Summary for: RED CURVE SOLUTIONS, LLC

The exact name of the Domestic Limited Liability Company (LLC): RED CURVE SOLUTIONS, LLC

The name was changed from: SHOREMEN CAPITAL, LLC **on** 03-22-2012

The name was changed from: SHOREMEN CAPITAL, LLC **on** 03-22-2012

The name was changed from: CRATE CONSULTING GROUP, LLC **on** 05-25-2010

Entity type: Domestic Limited Liability Company (LLC)

Identification Number: 270471971

Date of Organization in Massachusetts: 08-10-2009 **Date of Revival:**

Last date certain:

The location or address where the records are maintained (A PO box is not a valid location or address):

Address: 138 CONANT STREET SUITE 401

City or town, State, Zip code, BEVERLY, MA 01915 USA

Country:

The name and address of the Resident Agent:

Name: BRADLEY T. CRATE

Address: 66 BRIDGE STREET

City or town, State, Zip code, MANCHESTER, MA 01944 USA

Country:

The name and business address of each Manager:

Title	Individual name	Address
MANAGER	BRADLEY T CRATE	138 CONANT STREET BEVERLY, MA 01915 USA

In addition to the manager(s), the name and business address of the person(s) authorized to execute documents to be filed with the Corporations Division:

Title	Individual name	Address
SOC SIGNATORY	BRADLEY T. CRATE	138 CONANT STREET BEVERLY, MA 01915 USA

The name and business address of the person(s) authorized to execute, acknowledge, deliver, and record any recordable instrument purporting to affect an interest in real property:

Title	Individual name	Address
REAL PROPERTY	BRADLEY T. CRATE	138 CONANT STREET BEVERLY, MA 01915 USA

Consent **Confidential Data** **Merger Allowed** **Manufacturing**

View filings for this business entity:

ALL FILINGS

- Annual Report
- Annual Report - Professional
- Articles of Entity Conversion
- Certificate of Amendment
- Certificate of Cancellation

View filings

Comments or notes associated with this business entity:

New search

EXHIBIT B



**The Commonwealth of Massachusetts
William Francis Galvin**

Minimum Fee: \$500.00

Secretary of the Commonwealth, Corporations Division
One Ashburton Place, 17th floor
Boston, MA 02108-1512
Telephone: (617) 727-9640

Certificate of Organization

(General Laws, Chapter)

Federal Employer Identification Number: 270471971 (must be 9 digits)

1. The exact name of the limited liability company is: CRATE CONSULTING GROUP, LLC

2a. Location of its principal office:

No. and Street: 7 RANTOUL STREET
SUITE 202
City or Town: BEVERLY State: MA Zip: 01915 Country: USA

2b. Street address of the office in the Commonwealth at which the records will be maintained:

No. and Street: 7 RANTOUL STREET
SUITE 202
City or Town: BEVERLY State: MA Zip: 01915 Country: USA

3. The general character of business, and if the limited liability company is organized to render professional service, the service to be rendered:

IT IS ORGANIZED TO PROVIDE PROFESSIONAL SERVICES. THE SERVICES WILL BE AS A FINANCIAL AND POLITICAL CONSULTANT.

4. The latest date of dissolution, if specified: 7/1/2009

5. Name and address of the Resident Agent:

Name: BRADLEY T. CRATE
No. and Street: 45 OAK STREET
City or Town: BEVERLY FARMS State: MA Zip: 01915 Country: USA

I, BRADLEY T. CRATE resident agent of the above limited liability company, consent to my appointment as the resident agent of the above limited liability company pursuant to G. L. Chapter 156C Section 12.

6. The name and business address of each manager, if any:

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code
MANAGER	BRADLEY T. CRATE	7 RANTOUL STREET BEVERLY, MA 01915 USA

7. The name and business address of the person(s) in addition to the manager(s), authorized to execute documents to be filed with the Corporations Division, and at least one person shall be named if there are no managers.

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code

8. The name and business address of the person(s) authorized to execute, acknowledge, deliver and record any recordable instrument purporting to affect an interest in real property:

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code

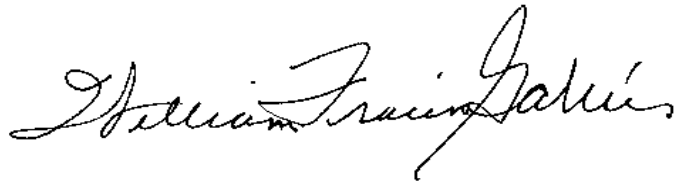
9. Additional matters:

SIGNED UNDER THE PENALTIES OF PERJURY, this 10 Day of August, 2009,
BRADLEY T. CRATE
(The certificate must be signed by the person forming the LLC.)

THE COMMONWEALTH OF MASSACHUSETTS

I hereby certify that, upon examination of this document, duly submitted to me, it appears that the provisions of the General Laws relative to corporations have been complied with, and I hereby approve said articles; and the filing fee having been paid, said articles are

deemed to have been filed with me on:
August 10, 2009 10:11 AM

A handwritten signature in black ink, reading "William Francis Galvin". The signature is written in a cursive style with a large, prominent initial "W".

WILLIAM FRANCIS GALVIN

Secretary of the Commonwealth

EXHIBIT C

The Commonwealth of Massachusetts, William Francis Galvin
Corporations Division

One Ashburton Place - Floor 17, Boston MA 02108-1512 | Phone: 617-727-9640

Annual Report

(General Laws, Chapter 156C, Section 12)

Filing Fee: \$500.00

Identification Number:	270471971
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Annual Report Filing Year:	2023
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1.a. Exact name of the limited liability company:	RED CURVE SOLUTIONS, LLC
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<input type="checkbox"/> Check if amending entity name
1.b. The exact name of the limited liability company as amended, is:
RED CURVE SOLUTIONS, LLC

2. Address in the Commonwealth where the records will be maintained:					
Number and street:	138 CONANT STREET				
Address 2:	SUITE 401				
City or town:	BEVERLY	State:	MA	Zip code:	01915
Country:	UNITED STATES				

3. The general character of business, and if the limited liability company is organized to render professional service, the service to be rendered:
COMPREHENSIVE TREASURY, BUDGETING, AND FEC COMPLIANCE SERVICES FOR POLITICAL CAMPAIGNS, PARTY ORGANIZATIONS, AND PACS.

4. The latest date of dissolution, if specified: (mm/dd/yyyy)

5. Name and address of the Resident Agent:					
Agent name:	BRADLEY T. CRATE				
Number and street:	66 BRIDGE STREET				
Address 2:					
City or town:	MANCHESTER	State:	MA	Zip code:	01944

6. The name and business address of each manager, if any:

Title	Name	Address
MANAGER	BRADLEY T CRATE	138 CONANT STREET BEVERLY, MA 01915 USA

7. The name and business address of the person(s) in addition to the manager(s), authorized to execute documents to be filed with the Corporations Division, and at least one person shall be named if there are no managers.

Title	Name	Address
SOC SIGNATORY	BRADLEY T. CRATE	138 CONANT STREET BEVERLY, MA 01915 USA

8. The name and business address of the person(s) authorized to execute, acknowledge, deliver and record any recordable instrument purporting to affect an interest in real property:

Title	Name	Address
REAL PROPERTY	BRADLEY T. CRATE	138 CONANT STREET BEVERLY, MA 01915 USA

9. Additional matters:

SIGNED UNDER THE PENALTIES OF PERJURY, this 3 Day of August, 2023,

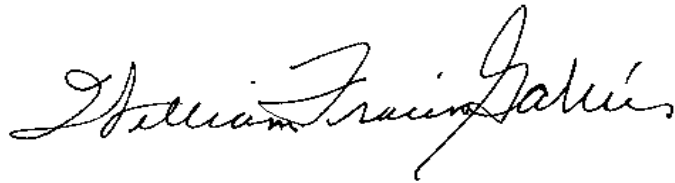
BRADLEY T CRATE

, Signature of Authorized Signatory.

THE COMMONWEALTH OF MASSACHUSETTS

I hereby certify that, upon examination of this document, duly submitted to me, it appears that the provisions of the General Laws relative to corporations have been complied with, and I hereby approve said articles; and the filing fee having been paid, said articles are deemed to have been filed with me on:

August 03, 2023 03:45 PM

A handwritten signature in black ink, reading "William Francis Galvin". The signature is written in a cursive style with a large, prominent initial "W".

WILLIAM FRANCIS GALVIN

Secretary of the Commonwealth