

**BEFORE THE FEDERAL ELECTION COMMISSION**

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

v. MUR No. \_\_\_\_\_

ARDLEIGH IMPACT CORPORATION  
7816 Rose Garden Ln  
Springfield, VA 22153

ANY UNKNOWN PERSON(S)  
who made a contribution to AFC Victory  
Fund, Buckeye Leadership Fund, Inc.,  
Congressional Leadership Fund,  
Conservatives for American Excellence,  
Inc., Defend Ohio Values PAC, and More  
Jobs, Less Government, in the name of  
Ardleigh Impact Corporation

**COMPLAINT**

1. Ardleigh Impact Corporation (“Ardleigh”), an obscure entity formed in Delaware on October 25, 2023, purported to contribute \$2,575,000 to six different federal committees between February 9, 2024, and March 21, 2024—beginning just three months after its formation. There is no publicly available information indicating that Ardleigh conducted any activity from which it could have generated sufficient funds to make \$2,575,000 in contributions during the three-month period between its formation and this torrent of election spending. As such, there is reason to believe Ardleigh was not the true source of the funds contributed in its name, and was instead established and used as a “straw donor” by one or more unknown persons seeking to make \$2.575 million in federal political contributions while concealing the true contributors’ identities. This straw donor scheme violates federal campaign finance laws that uphold basic electoral transparency and protect Americans’ right to know who is spending money to influence our elections.

2. The available information indicates that Ardleigh did not have the financial means to contribute \$2.575 million without another person providing it with funds for that purpose, and thus that one or more unidentified true contributors transferred money to Ardleigh for the purpose of having it contribute \$2.575 million while concealing their identities as the true source(s) of those contributions.
3. Accordingly, there is reason to believe that Ardleigh and the unknown true contributors violated 52 U.S.C. § 30122, which prohibits making or knowingly permitting one's name to be used to effect a contribution in the name of another.<sup>1</sup>
4. This complaint is filed pursuant to 52 U.S.C. § 30109(a)(1) and is based on information and belief that Ardleigh, and any persons that created, operated, or made contributions in the name of Ardleigh, 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."<sup>2</sup>

#### **FACTUAL BACKGROUND**

5. "Ardleigh Impact Corp." was organized in Delaware as a domestic corporation on October 25, 2023, and its registered agent is the Corporation Trust Company.<sup>3</sup>
6. Ardleigh does not appear to have any discernible public footprint:
  - a. Searches on Google provide no results that originate from Ardleigh itself or that detail any activity by Ardleigh; the only relevant result relates solely to one of the contributions at issue in this complaint.

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<sup>1</sup> See 52 U.S.C. § 30122.

<sup>2</sup> *Id.* § 30109(a)(2) (emphasis added); *see also* 11 C.F.R. § 111.4(a).

<sup>3</sup> "Ardleigh Impact Corp.," Entity Details, DE Dep't of State: Div. of Corps. (attached as Exhibit A). The Corporation Trust Company is located at Corporation Trust Center, 1209 Orange St., Wilmington DE, 19801. *Id.*

- b. Ardleigh does not appear to have a public website, or any account or page on Facebook, Instagram, or X (formerly known as Twitter).
  - c. There is no record of Ardleigh in searches with the Better Business Bureau,<sup>4</sup> Bloomberg,<sup>5</sup> EDGAR,<sup>6</sup> or the Mount Vernon Springfield Chamber of Commerce—the local chamber of commerce for an address associated with Ardleigh.<sup>7</sup>
7. Six different federal political committees (five super PACs and one “hybrid” PAC) reported receiving a collective total of \$2,575,000 in contributions from Ardleigh between February 9, 2024, and March 21, 2024.<sup>8</sup> Those committees were: AFC Victory Fund; Buckeye Leadership Fund, Inc.; Congressional Leadership Fund; Conservatives for American Excellence Inc.; Defend Ohio Values PAC; and More Jobs, Less Government (collectively referred to hereafter as “the Committees”).
8. AFC Victory Fund registered with the Commission as an independent-expenditure only political committee (“IEOPC”)—commonly known as a “super PAC”—on July 27, 2023, and Lisa Lisker is its treasurer.<sup>9</sup> It reported receiving a \$150,000 contribution from Ardleigh on February 9, 2024.<sup>10</sup>

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<sup>4</sup> See Better Business Bureau, <https://www.bbb.org/search/> (last visited May 6, 2024).

<sup>5</sup> See Bloomberg, Company Search, <https://www.bloomberg.com/> (last visited May 6, 2024).

<sup>6</sup> U.S. Securities and Exchange Commission, EDGAR, <https://www.sec.gov/edgar/search/> (last visited May 6, 2024).

<sup>7</sup> Mount Vernon Springfield Chamber of Commerce, Business Directory Search for Ardleigh Impact, <https://cca.mountvernon.springfield.com/WebForms/OnlineMemberlistingBySearch2.aspx?dbid2=VAMTVL&searchterm=ardleigh> (last visited May 6, 2024).

<sup>8</sup> See *infra* notes 10, 13, 16, 18, 23, 25 (disclosure reports reflecting contributions received in Ardleigh’s name).

<sup>9</sup> AFC Victory Fund, Statement of Org. at 1, 2 (July 27, 2023), <https://docquery.fec.gov/pdf/130/202307279584067130/202307279584067130.pdf>.

<sup>10</sup> AFC Victory Fund, 2024 April Quarterly Report at 7 (Apr. 15, 2024), <https://docquery.fec.gov/pdf/420/202404159633112420/202404159633112420.pdf>.

9. More Jobs, Less Government registered with the Commission as an IEOPC on Jan. 14, 2019,<sup>11</sup> and Charles Gantt is its treasurer.<sup>12</sup> It reported receiving a \$200,000 contribution from Ardleigh on February 29, 2024.<sup>13</sup>
10. Buckeye Leadership Fund, Inc. registered with the Commission as an IEOPC on October 6, 2021,<sup>14</sup> and Janna Rutland is its treasurer.<sup>15</sup> It reported receiving \$625,000 in total from Ardleigh: a \$550,000 contribution on March 4, 2024, and a \$75,000 contribution on March 13, 2024.<sup>16</sup>
11. Defend Ohio Values PAC registered with the Commission as an IEOPC on March 23, 2023, and Katie Terry is its treasurer.<sup>17</sup> It reported receiving \$700,000 in total from Ardleigh: a \$200,000 contribution on March 8, 2024, and a \$500,000 contribution on March 15, 2024.<sup>18</sup>
12. Congressional Leadership Fund (“CLF”) first registered with the Commission as an IEOPC on October 24, 2011,<sup>19</sup> and Caleb Crosby is its treasurer.<sup>20</sup> CLF is now organized

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<sup>11</sup> More Jobs, Less Government, Statement of Org. at 1, 2 (Jan. 14, 2019), <https://docquery.fec.gov/pdf/677/201901149143813677/201901149143813677.pdf>.

<sup>12</sup> More Jobs, Less Government, Amended Statement of Org. at 1 (Jan. 19, 2023), <https://docquery.fec.gov/pdf/722/202301199574858722/202301199574858722.pdf>.

<sup>13</sup> More Jobs, Less Government, 2024 April Quarterly Report at 6 (Apr. 15, 2024), <https://docquery.fec.gov/pdf/127/202404159633119127/202404159633119127.pdf>.

<sup>14</sup> Buckeye Leadership Fund, Statement of Org. at 1, 2 (Oct. 6, 2021), <https://docquery.fec.gov/pdf/741/202110069467200741/202110069467200741.pdf>.

<sup>15</sup> Buckeye Leadership Fund, Amended Statement of Org. at 1 (Dec. 22, 2022), <https://docquery.fec.gov/pdf/740/202212229574215740/202212229574215740.pdf>.

<sup>16</sup> Buckeye Leadership Fund, 2024 April Quarterly Report at 6, 9 (Apr. 15, 2024), <https://docquery.fec.gov/pdf/214/202404159627656214/202404159627656214.pdf>.

<sup>17</sup> Defend Ohio Values PAC, Statement of Org. at 1, 2 (Mar. 23, 2023), <https://docquery.fec.gov/pdf/333/202303239579669333/202303239579669333.pdf>.

<sup>18</sup> Defend Ohio Values PAC, 2024 April Quarterly Report at 6, 7 (Apr. 15, 2024), <https://docquery.fec.gov/pdf/213/202404159627752213/202404159627752213.pdf>.

<sup>19</sup> Congressional Leadership Fund, Statement of Org. at 1, 2 (Oct. 24, 2011), <https://docquery.fec.gov/pdf/996/11030681996/11030681996.pdf>

<sup>20</sup> Congressional Leadership Fund, Amend. Statement of Org. at 1 (Jan. 3, 2024), <https://docquery.fec.gov/pdf/637/202401039599968637/202401039599968637.pdf>.

as a “hybrid” PAC,<sup>21</sup> which maintains both a contribution account and a non-contribution account used exclusively to make independent expenditures.<sup>22</sup> CLF reported receiving a \$500,000 contribution from Ardleigh on March 21, 2024.<sup>23</sup>

13. Conservatives for American Excellence Inc. registered with the Commission as an IEOPC on March 23, 2023, and Chrissie Hastie is its treasurer.<sup>24</sup> It reported receiving a \$400,000 contribution from Ardleigh on March 21, 2024.<sup>25</sup>

14. The federal contributions made in Ardleigh’s name are summarized in the table below:

DATE	RECIPIENT	CONTRIBUTION AMOUNT
2/9/2024	AFC Victory Fund	\$150,000
2/29/2024	More Jobs, Less Government	\$200,000
3/4/2024	Buckeye Leadership Fund, Inc.	\$550,000
3/8/2024	Defend Ohio Values PAC	\$200,000
3/13/2024	Buckeye Leadership Fund, Inc.	\$75,000
3/15/2024	Defend Ohio Values PAC	\$500,000
3/21/2024	Congressional Leadership Fund	\$500,000
3/21/2024	Conservatives for American Excellence Inc.	\$400,000
<b>TOTAL</b>		<b>\$2,575,000</b>

15. FEC disclosure records indicate that Ardleigh has made no other federal political contributions.<sup>26</sup>

<sup>21</sup> *Id* at 2.

<sup>22</sup> See Press Release, *FEC Statement on Carey v. FEC: Reporting Guidance for Political Committees that Maintain a Non-Contribution Account* (Oct. 5, 2011), <https://www.fec.gov/updates/fec-statement-on-carey-fec/>.

<sup>23</sup> Congressional Leadership Fund, 2024 April Quarterly Report at 42 (Apr. 15, 2024), <https://docquery.fec.gov/pdf/323/202404159633232323/202404159633232323.pdf>.

<sup>24</sup> Conservatives for American Excellence Inc., Statement of Org. at 1, 2 (Mar. 23, 2023), <https://docquery.fec.gov/pdf/060/202303239579676060/202303239579676060.pdf>.

<sup>25</sup> Conservatives for American Excellence Inc., 2024 April Monthly Report at 6 (Apr. 20, 2024), <https://docquery.fec.gov/pdf/332/202404209633606332/202404209633606332.pdf>.

<sup>26</sup> All Receipts, “Ardleigh Impact,” [https://www.fec.gov/data/receipts/?data\\_type=processed&contributor\\_name=ardleigh+impact+corp](https://www.fec.gov/data/receipts/?data_type=processed&contributor_name=ardleigh+impact+corp) (last visited May 6, 2024).

16. The address provided in connection with each contribution made in Ardleigh’s name is “7816 Rose Garden Lane, Springfield VA, 22153.”<sup>27</sup> Property records indicate that this residential property is currently owned by Michael and Staci Goede.<sup>28</sup>
17. Staci Goede is listed as the current treasurer for 21 federal committees registered with the Commission, including principal campaign committees, leadership PACs, and unauthorized committees such as super PACs and “hybrid” PACs.<sup>29</sup>
18. There are three other organizations publicly associated with the address “7816 Rose Garden Lane, Springfield VA, 22153”: “Sage Advisory Group,” which appears to be an inactive Virginia entity;<sup>30</sup> “Empowering Virginia Parents,” a federal IEOPC that registered with the Commission on October 6, 2022, for which Staci Goede serves as treasurer;<sup>31</sup> and “American Resolve Project Fund,” a corporation registered in Delaware that claims 501(c)(3) nonprofit status.<sup>32</sup>

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<sup>27</sup> See, e.g., AFC Victory Fund, 2024 April Quarterly Report at 7 (Apr. 15, 2024), <https://docquery.fec.gov/pdf/420/202404159633112420/202404159633112420.pdf>.

<sup>28</sup> Transaction History for “7816 Rose Garden Ln, Springfield VA, 22153” (attached as Exhibit B) (showing that Michael and Staci Goede purchased the property on April 23, 2010).

<sup>29</sup> Committees, “Staci Goede,” [https://www.fec.gov/data/committees/?treasurer\\_name=goede%2C+staci](https://www.fec.gov/data/committees/?treasurer_name=goede%2C+staci) (last visited May 6, 2024). In her capacity as a treasurer, Goede is responsible for “monitor[ing] contributions, ensuring they comply with legal limits and prohibitions.” *Appointing a Treasurer*, <https://www.fec.gov/help-candidates-and-committees/get-treasurer/> (last visited May 6, 2024).

<sup>30</sup> Business Entity Search Results for “Sage Advisory Group,” VA Sec’y of State Corp. Comm. (last visited May 6, 2024) (attached as Exhibit C).

<sup>31</sup> Empowering Virginia Parents, Statement of Org. at 1–2 (Oct. 6, 2022), <https://docquery.fec.gov/pdf/293/202210069532076293/202210069532076293.pdf>; Empowering Virginia Parents, Amend. Statement of Org. at 1 (Apr. 8, 2024), <https://docquery.fec.gov/pdf/376/202404089627482376/202404089627482376.pdf> (showing Staci Goede’s use of an email address associated with Sage Advisory Group and the address at 7816 Rose Garden Lane).

<sup>32</sup> See Final Determination Letter from the Internal Revenue Service to American Resolve Project Fund (Dec. 5, 2023) (attached as Exhibit D); see also American Resolve Project Fund, Donate Stock, <https://donatestock.com/american-resolve-project-fund> (last visited May 6, 2024); see also American Resolve Project Fund, WinRed, <https://secure.winred.com/american-resolve-project-fund/donate-today> (last visited May 6, 2024).

## SUMMARY OF THE LAW

19. FECA provides that “[n]o person shall make a contribution in the name of another person or knowingly permit his name to be used to effect such a contribution and no person shall knowingly accept a contribution made by one person in the name of another person.”<sup>33</sup>
20. The Commission regulation implementing the statutory prohibition provides the following examples of contributions in the name of another:
  - a. “Giving money or anything of value, all or part of which was provided to the contributor by another person (the true contributor) without disclosing the source of money or the thing of value to the recipient candidate or committee at the time the contribution is made.”
  - b. “Making a contribution of money or anything of value and attributing as the source of the money or thing of value another person when in fact the contributor is the source.”<sup>34</sup>
21. The requirement that a contribution be made in the name of its true source promotes Congress’s objective of ensuring the complete and accurate disclosure by candidates and committees of the political contributions they receive,<sup>35</sup> and ensures that the public and complainants are fully informed about the true sources of political contributions and expenditures. Such transparency also enables voters, including complainant Gonsalves-

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<sup>33</sup> 52 U.S.C. § 30122.

<sup>34</sup> 11 C.F.R. § 110.4(b)(2)(i)-(ii).

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

Brown, to have the information necessary to evaluate candidates for office, “make informed decisions[,] and give proper weight to different speakers and messages.”<sup>36</sup>

22. FECA and Commission regulations provide that a person who furnishes another with funds for the purpose of contributing to a candidate or committee “makes” the resulting contribution, whether funds are advanced to another person to make a contribution in that person’s name or promised as reimbursement of a solicited contribution.<sup>37</sup> Moreover, the “key issue . . . is the source of the funds” and, therefore, the legal status of the funds when conveyed from a conduit to the ultimate recipient is “irrelevant to a determination of who ‘made’ the contribution for the purposes of [Section 30122].”<sup>38</sup>
23. On April 1, 2016, then-Chair Petersen and then-Commissioners Hunter and Goodman issued a Statement of Reasons explaining their view regarding “the appropriate standard” to apply “in future matters” raising the allegation that an LLC was used to facilitate a contribution in the name of another.<sup>39</sup> The Commissioners explained that in their view, “the proper focus in these matters is whether the funds used to make a contribution were intentionally funneled through a closely held corporation or corporate LLC for the purpose of making a contribution that evades the Act’s reporting requirements, making

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<sup>36</sup> *Citizens United v. FEC*, 558 U.S. 310, 369–71 (2010).

<sup>37</sup> See *United States v. Boender*, 649 F.3d 650, 660 (7th Cir. 2011) (holding that to determine who made a contribution “we consider the giver to be the source of the gift, not any intermediary who simply conveys the gift from the donor to the donee.”); *O’Donnell*, 608 F.3d at 550, 555; *Goland v. United States*, 903 F.2d 1247, 1251 (9th Cir. 1990) (“[FECA] prohibits the use of ‘conduits’ to circumvent . . . [reporting] restrictions.”).

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

<sup>39</sup> Statement of Reasons of Chairman Matthew S. Petersen and Commissioners Caroline C. Hunter and Lee E. Goodman at 2, MURs 6485, 6487, 6488, 6711, 6930 (Apr. 1, 2016), <https://www.fec.gov/files/legal/murs/6487/16044391129.pdf>.



the individual, not the corporation or corporate LLC, the true source of the funds.”<sup>40</sup> The relevant factors that these Commissioners indicated they would consider included:

[whether] there is evidence indicating that the corporate entity did not have income from assets, investment earnings, business revenues, or bona fide capital investments, or was created and operated for the sole purpose of making political contributions. These facts would suggest the corporate entity is a straw donor and not the true source of the contribution.<sup>41</sup>

24. An April 15, 2022, Statement of Reasons by then-Chairman Allen Dickerson, then-Vice Chair Steven T. Walther, and Commissioners Shana M. Broussard and Ellen L.

Weintraub reiterated that the public is now on notice that FECA’s straw donor ban and Commission regulations implementing that provision — *i.e.*, the “conduit contribution rules” — apply when LLCs purport to make contributions to IEOPCs:

[T]he Commission [previously] did not agree whether, following *Citizens United* and *SpeechNow.org v. FEC*, respondent committees had received adequate notice that the Commission’s LLC reporting rules and conduit contribution rules applied to contributions made to the newly formed IEOPCs authorized by those judicial rulings. With the passage of time, IEOPCs have become a regular part of the campaign finance landscape, and adequate notice to the public now exists. Consequently, there is *no longer a lack of clarity* concerning the application of LLC reporting rules and conduit contribution rules in these circumstances.<sup>42</sup>

Accordingly, the FEC has made clear that the public is “on notice” that the straw donor ban applies in such circumstances, and thus prohibits any person from funneling a contribution to an IEOPC through an LLC.

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<sup>40</sup> *Id.*

<sup>41</sup> *Id.* at 12.

<sup>42</sup> Statement of Reasons of Chairman Allen Dickerson, Vice Chair Steven T. Walther, Commissioner Shana M. Broussard, and Commissioner Ellen L. Weintraub at 2, MUR 7454 (Apr. 15, 2022) (emphases added), [https://www.fec.gov/files/legal/murs/7454/7454\\_36.pdf](https://www.fec.gov/files/legal/murs/7454/7454_36.pdf).

25. In MUR 7903, the Commission found reason to believe that “Tomfoolery LLC” and its single member, Thomas Chavez, violated Section 30122 when Chavez provided funds to the LLC for it to make contributions in its name to a super PAC; the Commission found that “Tomfoolery was not the true source of the combined \$75,000 that it facially appeared to give to [the super PAC], but instead served as an instrument to convey Chavez’s funds to [the super PAC] without publicly disclosing his identity.”<sup>43</sup> The Commission subsequently entered into a conciliation agreement with Tomfoolery LLC and Chavez, which included a \$25,000 civil penalty.<sup>44</sup>
26. Straw donor contributions like those alleged here are serious violations of federal campaign finance law that have led to criminal indictments and convictions.<sup>45</sup> As explained in one such indictment, the straw donor ban works in tandem with other campaign finance laws to protect the integrity of our electoral system and to ensure that all candidates, campaign committees, federal regulators, and the public are informed of the true sources of money spent to influence federal elections.<sup>46</sup> Another indictment

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<sup>43</sup> Factual and Legal Analysis at 7, MUR 7903 (Tomfoolery LLC, *et al.*), [https://www.fec.gov/files/legal/murs/7903/7903\\_13.pdf](https://www.fec.gov/files/legal/murs/7903/7903_13.pdf).

<sup>44</sup> See Conciliation Agreement ¶ VI, MUR 7903 (Tomfoolery LLC, *et al.*), [https://www.fec.gov/files/legal/murs/7903/7903\\_16.pdf](https://www.fec.gov/files/legal/murs/7903/7903_16.pdf).

<sup>45</sup> See Colin Moynihan, *Lev Parnas, Ex-Giuliani Ally, Is Convicted of Campaign Finance Charges*, N.Y. Times (Oct. 22, 2021), <https://www.nytimes.com/2021/10/22/nyregion/lev-parnas-guilty-giuliani.html>; Dep’t of Justice, *Lev Parnas and Igor Fruman Charged with Conspiring to Violate Straw and Foreign Donor Bans* (Oct. 10, 2019), <https://www.justice.gov/usao-sdny/pr/lev-parnas-and-igor-fruman-charged-conspiring-violate-straw-and-foreign-donor-bans>; Dep’t of Justice, *Entertainer/Businessman and Malaysian Financier Indicted for Conspiring to Make and Conceal Foreign and Conduit Contributions During 2012 U.S. Presidential Election* (May 10, 2019), <https://www.justice.gov/opa/pr/entertainerbusinessman-and-malaysian-financier-indicted-conspiring-make-and-conceal-foreign>.

<sup>46</sup> Grand Jury Indictment, *United States v. Lev Parnas, et al.*, Cr. No. 19-725 (S.D.N.Y. Oct. 10, 2019), <https://www.justice.gov/usao-sdny/press-release/file/1208281/download>.

highlighted how straw donor schemes have been used to skirt FECA’s source prohibitions, such as the ban on contributions by government contractors.<sup>47</sup>

27. Even for contributions that would otherwise be legal—*i.e.*, contributions that would not be prohibited or excessive, if made in the true contributor’s own name—the prohibition of contributions in the name of another serves FECA’s core transparency purposes by ensuring that voters have access to complete and accurate information regarding the sources of electoral contributions.

### CAUSE OF ACTION

#### COUNT I:

#### **ARDLEIGH AND THE UNKNOWN PERSON(S) WHO CONTRIBUTED TO THE COMMITTEES IN THE NAME OF ARDLEIGH VIOLATED 52 U.S.C. § 30122**

28. The available information indicates that Ardleigh did not have the means to contribute \$2.575 million to the Committees without other persons providing funds to the corporation for that purpose, such that these unknown other persons were, in fact, the true source(s) of the contribution.
29. Ardleigh was registered as a Delaware corporation on October 25, 2023,<sup>48</sup> and, just three months later, purported to contribute \$2.575 million to the Committees between February 9 and March 21, 2024.<sup>49</sup>
30. During the intervening period between its formation and when it began making contributions aggregating over \$2.5 million, Ardleigh does not appear to have engaged in

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<sup>47</sup> Dep’t of Justice, *Former Government Contractor Executives Indicted for Unlawful Campaign Contributions* (Feb. 10, 2022), <https://www.justice.gov/opa/pr/former-government-contractor-executives-indicted-unlawful-campaign-contributions>; see Dep’t of Justice, *Former Government Contractor Executive Pleads Guilty to Unlawful Campaign Contributions* (Sept. 27, 2022), <https://www.justice.gov/opa/pr/former-government-contractor-executive-pleads-guilty-unlawful-campaign-contributions>.

<sup>48</sup> See *supra* note 3.

<sup>49</sup> See *supra* ¶¶ 7–14.

any activity from which it could have garnered the funds with which to make these contributions—absent being provided sufficient funds by one or more other persons, the true contributor(s). Indeed, Ardleigh appears to exist solely on paper; it has no discernible presence online or on social media platforms, nor is there any news article or public record that provides any information about its activities.<sup>50</sup>

31. As such, Ardleigh appears to have engaged in no activity and served no purpose—aside from facilitating the straw donor contributions at issue in this matter—between the date of its formation and the dates of the \$2.575 million in contributions made in its name. It is utterly implausible that a nascent entity with no discernible footprint could have generated or acquired sufficient funds in so short a period to enable it to make \$2.575 million in contributions in its own name, with its own funds. Thus, Ardleigh appears to have “lacked the financial wherewithal to make the [\$2,575,000] contribution[s] to [the Committees] on its own.”<sup>51</sup>
32. The use of a straw donor, such as the opaque and obscure Delaware corporation at issue, to effectively act as a clearinghouse for the contributions of other persons—whose identities thereby remain concealed from the public—fundamentally undermines the basic transparency required under FECA, which is essential to empower voters to participate in elections with full knowledge of who is spending money to influence their vote and to protect elections against real or apparent corruption.
33. Accordingly, based on the foregoing, there is reason to believe that the unidentified person(s) who contributed \$2,575,000 to the Committees in the name of Ardleigh violated 52 U.S.C. § 30122 by making contributions in the name of another, and that

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<sup>50</sup> See *supra* ¶ 6.

<sup>51</sup> Tomfoolery F&LA at 5.

Ardleigh violated 52 U.S.C. § 30122 when it knowingly permitted its name to be used to effect contributions of one or more other persons in its own name.

**PRAYER FOR RELIEF**

34. Wherefore, the Commission should find reason to believe that Ardleigh, and any person(s) who created, operated, and made contributions to or in the name of this entity have violated 52 U.S.C. § 30101 *et seq.*, and conduct an immediate investigation under 52 U.S.C. § 30109(a)(2).
35. 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,

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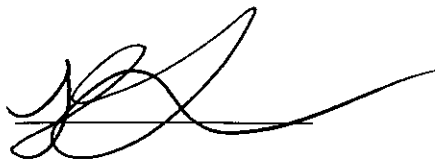
May 7, 2024

**VERIFICATION**

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


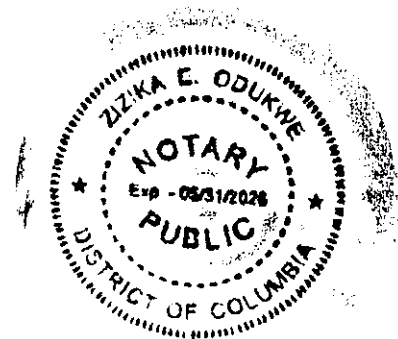
Sworn pursuant to 18 U.S.C. § 1001.

For Complainant Sophia Gonsalves-Brown



Sophia Gonsalves-Brown

Sworn to and subscribed before me this 6<sup>th</sup> day of May 2024.

  
Notary Public

**VERIFICATION**

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

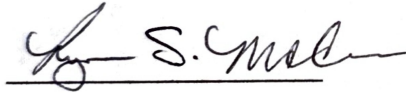
Sworn pursuant to 18 U.S.C. § 1001.

For Complainant Campaign Legal Center



Saurav Ghosh, Esq.

Sworn to and subscribed before me this 7 day of May 2024.



Notary Public



# **EXHIBIT A**





HOME

Entity Details

**THIS IS NOT A STATEMENT OF GOOD STANDING**

<a href="#">File Number:</a>	2540565	<a href="#">Incorporation Date / Formation Date:</a>	10/25/2023 (mm/dd/yyyy)
<a href="#">Entity Name:</a>	ARDLEIGH IMPACT CORP.		
<a href="#">Entity Kind:</a>	Corporation	<a href="#">Entity Type:</a>	Exempt
<a href="#">Residency:</a>	Domestic	State:	DELAWARE

**REGISTERED AGENT INFORMATION**

Name:	THE CORPORATION TRUST COMPANY		
Address:	CORPORATION TRUST CENTER 1209 ORANGE ST		
City:	WILMINGTON	County:	New Castle
State:	DE	Postal Code:	19801
Phone:	302-658-7581		

Additional Information is available for a fee. You can retrieve Status for a fee of \$10.00 or more detailed information including current franchise tax assessment, current filing history and more for a fee of \$20.00.

Would you like  Status  Status, Tax & History Information

Submit

View Search Results

New Entity Search

For help on a particular field click on the Field Tag to take you to the help area.

# **EXHIBIT B**

1 OF 1 RECORD(S)

7816 ROSE GARDEN LN  
 SPRINGFIELD, VA 22153-2368

<b>Transaction History</b>							
<b>Sale Date</b>	<b>Buyer</b>	<b>Seller</b>	<b>Sale Price</b>	<b>Loan Amount</b>	<b>Lender</b>	<b>Recording Date</b>	<b>Source</b>
11/10/2023	GOEDE, MICHAEL J GOEDE, STACI A				CHAIN BRIDGE BK NA CHAIN BRIDGE BK NA	11/20/2023	A
03/04/2022	GOEDE, MICHAEL J GOEDE, STACI A				PNC BK NATIONAL ASSN PNC BK NATIONAL ASS	03/24/2022	A
07/28/2017	GOEDE, MICHAEL J GOEDE, STACI A				PNC BK NATIONAL ASSN PNC BK NATIONAL ASS	08/14/2017	A
12/21/2015	GOEDE, JEFFREY GOEDE, STACI A				NATIONSTAR MTG LLC	12/29/2015	A
04/23/2010	GOEDE, MICHAEL J GOEDE, STACI A				PHH MTG	04/26/2010	A
04/23/2010	GOEDE, MICHAEL JEFFREY				Phh Mortgage Corporation	04/26/2010	B
07/01/2009					WCS LNDG LLC	07/07/2009	A
12/05/2008					WCS LNDG	12/08/2008	A
12/05/2008					WCS	12/08/2008	B



7816\_rose\_garden\_lane

accurate. Before relying on any data this system supplies, it should be independently verified. For Secretary of State documents, the following data is for information purposes only and is not an official record. Certified copies may be obtained from that individual state's Department of State.

Your DPPA Permissible Use: I have no permissible use

Your Secondary DPPA Permissible Use: None

Your GLBA Permissible Use: I have no permissible use

Your DMF Permissible Use: I have no permissible use

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End of Document

# **EXHIBIT C**

## Business Entity Search Results

Entity ID	Entity Name	Name Type	Entity Type	Series LLC	Principal Office Address	RA Name	Status
<a href="#">11338059</a>	Sage Advisory Group	Fictitious Name	Limited Liability Company	No	4445 Corporation Ln STE 264 , Virginia Beach, VA, 23462, USA	Northwest Registered Agent LLC	Pending Inactive
<a href="#">S8389357</a>	SAGE ADVISORY GROUP LLC	Legal Name	Limited Liability Company	No	7816 Rose Garden Lane, Springfield, VA, 22153 - 0000, USA	United States Corporation Agents, Inc.	Inactive

Page 1 of 1, records  
1 to 2 of 2



(ExportSearchResults?hgridex=3)



(ExportSearchResults?hgridex=1)



(ExportSearchResults?hgridex=5)



(ExportSearchResults?hgridex=100)

**Note:** Export limitation for Word is 5000 records, Export limitation for PDF is 15000 records

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[Back to Login](#)

# **EXHIBIT D**





**Department of the Treasury**  
**Internal Revenue Service**  
**Tax Exempt and Government Entities**  
P.O. Box 2508  
Cincinnati, OH 45201

AMERICAN RESOLVE PROJECT FUND  
7816 ROSE GARDEN LANE  
SPRINGFIELD, VA 22153-2368

**Date:**  
12/05/2023

**Employer ID number:**  
93-3361808

**Person to contact:**  
Name: Mitch Steele  
ID number: 31360  
Telephone: 877-829-5500

**Accounting period ending:**  
December 31

**Public charity status:**  
170(b)(1)(A)(vi)

**Form 990 / 990-EZ / 990-N required:**  
Yes

**Effective date of exemption:**  
August 14, 2023

**Contribution deductibility:**  
Yes

**Addendum applies:**  
No

**DLN:**  
26053720006283

Dear Applicant:

We're pleased to tell you we determined you're exempt from federal income tax under Internal Revenue Code (IRC) Section 501(c)(3). Donors can deduct contributions they make to you under IRC Section 170. You're also qualified to receive tax deductible bequests, devises, transfers or gifts under Section 2055, 2106, or 2522. This letter could help resolve questions on your exempt status. Please keep it for your records.

Organizations exempt under IRC Section 501(c)(3) are further classified as either public charities or private foundations. We determined you're a public charity under the IRC Section listed at the top of this letter.

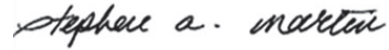
If we indicated at the top of this letter that you're required to file Form 990/990-EZ/990-N, our records show you're required to file an annual information return (Form 990 or Form 990-EZ) or electronic notice (Form 990-N, the e-Postcard). If you don't file a required return or notice for three consecutive years, your exempt status will be automatically revoked.

If we indicated at the top of this letter that an addendum applies, the enclosed addendum is an integral part of this letter.

For important information about your responsibilities as a tax-exempt organization, go to [www.irs.gov/charities](http://www.irs.gov/charities). Enter "4221-PC" in the search bar to view Publication 4221-PC, Compliance Guide for 501(c)(3) Public Charities, which describes your recordkeeping, reporting, and disclosure requirements.

We sent a copy of this letter to your representative as indicated in your power of attorney.

Sincerely,

A handwritten signature in black ink that reads "Stephen A. Martin". The signature is written in a cursive style.

Stephen A. Martin  
Director, Exempt Organizations  
Rulings and Agreements