

**BEFORE THE FEDERAL ELECTION COMMISSION**

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

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

ROYCE WHITE  
5131 Baker Road  
Hopkins, MN 55343

ROYCE WHITE FOR SENATE and  
TOM MADDEN in his official capacity  
as treasurer  
P.O. Box 5473  
Hopkins, MN 55343

ROYCE WHITE FOR CONGRESS and  
ROYCE ALEXANDER WHITE in his  
official capacity as treasurer  
150 S. 5th St., Suite 3100  
Minneapolis, MN 55402

**COMPLAINT**

1. Royce White, a 2022 congressional candidate who is now running for the U.S. Senate in Minnesota, appears to be unlawfully failing to report his Senate campaign committee's disbursements, after previously using his 2022 campaign to illegally pay over \$157,000 in personal expenses—including thousands of dollars in checks, wire transfers, and cash withdrawals, as well as payments for clothing, cosmetics, jewelry, fitness clubs, resort charges, and even strip clubs and nightclubs. As such, White appears to have misappropriated donors' money to benefit himself, and then doubled down by failing to report how his 2024 Senate campaign is spending its money, denying voters crucial information they have a right to know when deciding how to vote.
2. This outrageous pattern of personal enrichment and obfuscation violates the Federal Election Campaign Act's ("FECA") bedrock requirements that candidates must

accurately disclose the contributions they receive and the disbursements they make, and cannot use campaign funds to pay for their personal expenses.

3. This complaint is filed pursuant to 52 U.S.C. § 30109(a)(1) and is based on information and belief that White and his campaign committees have violated 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>1</sup>

#### FACTUAL BACKGROUND

4. Royce White is a 2024 candidate for the U.S. Senate in Minnesota.<sup>2</sup> His 2024 campaign committee, Royce White for Senate, registered with the Commission on September 15, 2023,<sup>3</sup> and Tom Madden is its current treasurer.<sup>4</sup>
5. Royce White for Senate’s original treasurer, Michelle Wahlen, notified the Commission on February 3, 2024, of her resignation as treasurer effective January 1, 2024.<sup>5</sup> After the Commission sent the committee a letter regarding Wahlen’s resignation as treasurer,<sup>6</sup> Tom Madden was named the committee’s new treasurer on April 30, 2024.<sup>7</sup> As such, Royce White for Senate appears to have had no treasurer of record for nearly four months

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

<sup>2</sup> Royce White, Statement of Candidacy at 1 (Sep. 15, 2023), <https://docquery.fec.gov/pdf/575/202309159597062575/202309159597062575.pdf>.

<sup>3</sup> Royce White for Senate, Statement of Org. at 1 (Sep. 15, 2023), <https://docquery.fec.gov/pdf/547/202309159597061547/202309159597061547.pdf>.

<sup>4</sup> Royce White for Senate, Amend. Statement of Org. at 1 (Apr. 30, 2024), <https://docquery.fec.gov/pdf/612/202404309636873612/202404309636873612.pdf>.

<sup>5</sup> Royce White for Senate, FEC Form 99 (Feb. 3, 2024), <https://docquery.fec.gov/pdf/139/202402039619675139/202402039619675139.pdf>. (Note: January 1, 2023 appears to have been inadvertently listed as Wahlen’s effective date of resignation.)

<sup>6</sup> Royce White for Senate, FEC Request for Additional Information (“RFAI”) (Feb. 28, 2024), <https://docquery.fec.gov/pdf/480/202402280300204480/202402280300204480.pdf>.

<sup>7</sup> Royce White for Senate, Amend. Statement of Org., *supra* note 4.

between January 1, 2024, and April 30, 2024, a period in which it reported receiving \$8,100 in contributions.<sup>8</sup>

6. Royce White for Senate has reported only one disbursement, for \$216.38, which it made on March 31, 2024, to “Anedot” for “Credit Card Processing Fees.”<sup>9</sup> Anedot appears to be a software company/platform used to record and manage financial transactions.<sup>10</sup>

Royce White for Senate has reported no other disbursements for any amount.

7. Royce White for Senate maintains a polished campaign website, which not only contains information about White’s platform but also solicits contributions through both the Anedot and WinRed donation platforms.<sup>11</sup> Royce White for Senate’s campaign website also links to a variety of social media pages affiliated with White, his Senate campaign, and his podcast, “Please Call Me Crazy,” including pages on X (formerly Twitter), Facebook, YouTube, Instagram, and Rumble.<sup>12</sup>

8. The Royce White for Senate website features an embedded campaign announcement video, which is also posted on YouTube, featuring a montage of images over which White explains why he is running for Senate.<sup>13</sup> The disclaimer statement appearing at the end of the video clearly states that the video is “paid for by Royce White for Senate.”<sup>14</sup>

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<sup>8</sup> Royce White for Senate, Apr. 2024 Quarterly Report at 2 (May 16, 2024), <https://docquery.fec.gov/pdf/458/202405169646041458/202405169646041458.pdf>; see 52 U.S.C. § 30102(a) (“Every political committee shall have a treasurer. No contribution or expenditure shall be accepted or made by or on behalf of a political committee during any period in which the office of treasurer is vacant.”).

<sup>9</sup> Royce White for Senate, Apr. 2024 Quarterly Report, *supra note* 8, at 19.

<sup>10</sup> Anedot, <https://www.anedot.com/> (last viewed June 5, 2024).

<sup>11</sup> See Screenshot, Royce White for Senate Campaign Website – Donations, <https://roycewhite.us/donor-page/> (attached as Ex. A).

<sup>12</sup> See Royce White, X, [https://x.com/Highway\\_30](https://x.com/Highway_30); Please Call Me Crazy, Facebook, <https://www.facebook.com/pleasecallmecrazy>; Royce White: Please Call Me Crazy, YouTube, <https://www.youtube.com/@pleasecallmecrazypodcast>; last.renaissance.man, Instagram, <https://www.instagram.com/last.renaissance.man/?hl=en>; Royce White, Rumble, <https://rumble.com/c/roycewhiteusa>.

<sup>13</sup> Royce White for Senate 2024!, YouTube (Dec. 20, 2023), <https://youtu.be/KAtuerIoonc?si=6k5fRqa7J0JqIAA6>.

<sup>14</sup> *Id.*

9. On May 18, 2024, the Minnesota Republican Party endorsed White to serve as the party's nominee for the U.S. Senate in the 2024 election.<sup>15</sup>
10. During the 2022 election cycle, White was a candidate for Congress in Minnesota's Fifth Congressional District.<sup>16</sup> His 2022 campaign committee, Royce White for Congress, registered with the Commission on February 22, 2022,<sup>17</sup> and White is its current treasurer. The committee's original treasurer, Nicholas Morgan, notified the Commission on July 7, 2022, of his resignation as treasurer effective July 8, 2022,<sup>18</sup> although a subsequent filing indicated that Morgan remained the committee's treasurer until the filing of the committee's July 2022 Quarterly Report, which was filed on July 15, 2022.<sup>19</sup>
11. White appears to have named himself as treasurer for Royce White for Congress on October 5, 2023, although the committee's Statement of Organization was never amended to reflect that intended appointment.<sup>20</sup> As such, Royce White for Congress appears to have had no treasurer of record between July 15, 2022, and October 5, 2023—a period of nearly 15 months—during which time it reported raising over \$16,300.<sup>21</sup>

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<sup>15</sup> Christopher Vondracek, *In a Surprise, Minnesota Republicans Back Royce White to Run Against Amy Klobuchar*, Star Tribune (May 18, 2024), <https://www.startribune.com/in-a-surprise-minnesota-republicans-back-royce-white-to-run-against-amy-klobuchar/600366972/>.

<sup>16</sup> Royce Alexander White, Statement of Candidacy at 1 (Feb. 24, 2022), <https://docquery.fec.gov/pdf/740/202202249493705740/202202249493705740.pdf>.

<sup>17</sup> Royce White for Congress, Statement of Org. at 1 (Feb. 22, 2022), <https://docquery.fec.gov/pdf/649/202202229493671649/202202229493671649.pdf>.

<sup>18</sup> Royce White for Congress, FEC Form 99 (July 7, 2022), <https://docquery.fec.gov/pdf/590/202207079517839590/202207079517839590.pdf>.

<sup>19</sup> Royce White for Congress, FEC Form 99 (July 15, 2022), <https://docquery.fec.gov/pdf/458/202207159522117458/202207159522117458.pdf>; *see also* Royce White for Congress, July 2022 Quarterly Report (July 15, 2022), <https://docquery.fec.gov/pdf/006/202207159522117006/202207159522117006.pdf>.

<sup>20</sup> Royce White for Congress, FEC Form 99 (Oct. 5, 2023), <https://docquery.fec.gov/pdf/801/202310059597407801/202310059597407801.pdf>.

<sup>21</sup> Royce White for Congress, Filtered Receipts, 7/15/2022–10/5/2023, [https://www.fec.gov/data/receipts/?data\\_type=processed&committee\\_id=C00806133&min\\_date=07%2F15%2F2022&max\\_date=10%2F05%2F2023](https://www.fec.gov/data/receipts/?data_type=processed&committee_id=C00806133&min_date=07%2F15%2F2022&max_date=10%2F05%2F2023) (last viewed June 5, 2024).

12. Royce White for Congress failed to timely file a 2022 Pre-Primary Report,<sup>22</sup> for which it was fined \$7,948 under the Commission’s Administrative Fines Program.<sup>23</sup>
13. Between March 9, 2022, and October 17, 2022, Royce White for Congress reported disbursing over \$157,000 on a variety of expenses that appear, on their face, to be personal; some of the disbursement descriptions clearly indicate a personal expense, while others are too ambiguous or opaque to tell.<sup>24</sup>
14. Moreover, the committee’s disbursement reporting fails, on its face, to comply with the reporting requirements set forth in FECA and Commission regulations: all or virtually all of reported disbursements after April 4, 2022, list the committee, “Royce White for Congress,” as the *recipient* of the payment, and only by parsing the disbursement descriptions can one glean (in many but not all cases) the actual likely recipient of the funds.<sup>25</sup>
15. Some of the committee’s reported disbursements, however, are completely opaque as to who actually received the funds, and for what (if any) campaign-related purpose the disbursement was made.<sup>26</sup> For example, the screenshot below is a reported disbursement

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<sup>22</sup> See RFAI, Royce White for Congress (July 29, 2022), <https://docquery.fec.gov/pdf/896/202207290300147896/202207290300147896.pdf>.

<sup>23</sup> See AF 4388, Letter to Royce White for Congress from Chair Dara Lindenbaum, FEC (May 25, 2023), [https://www.fec.gov/files/legal/admin\\_fines/4388/4388\\_01.pdf](https://www.fec.gov/files/legal/admin_fines/4388/4388_01.pdf) (“The Commission made a final determination on May 24, 2023 that Royce White for Congress . . . violated 52 U.S.C. § 30104(a), assessed a civil money penalty in the amount of \$7,948, in accordance with 11 C.F.R. § 111.43, and voted to close the file.”).

<sup>24</sup> See Roger Sollenberger and Mini Racker, *GOP Senate Candidate Spent Thousands in Donor Funds on Strip Clubs, Luxury, and Mysterious Wire Transfers*, Daily Beast (May 24, 2024), <https://www.thedailybeast.com/gop-sen-candidate-royce-white-spent-big-on-strip-clubs-limos-luxury> (“The unusual expenses include a total of more than \$100,000 in mysterious wire transfers and checks reported as paid to the campaign; hefty tabs at spicy nightspots; getaways at posh hotels in at least seven states; thousands of dollars in limousine services; unexplained cash withdrawals; eye-popping purchases from electronics, sporting goods, clothing, and musical instrument retailers; and the DribbleUp smart basketball training app that White himself admitted might be personal use.”).

<sup>25</sup> See, e.g., Royce White for Congress, July 2022 Quarterly Report at 73, <https://docquery.fec.gov/cgi-bin/fecimg/?202207159522117078> (disclosing April 15, 2022 disbursement of \$1,633.27 to “Royce White for Congress” with a description including “PURCHASE 04/14 14:28 GUITAR CENTER #3 MAPLE GROVE MN”).

<sup>26</sup> See, e.g., *id.* at 284, <https://docquery.fec.gov/cgi-bin/fecimg/?202207159522117289> (disclosing June 28, 2022, disbursement of \$10,000 to “Royce White for Congress” described as “outgoing wire transfer”).

for one of several “Outgoing Wire Transfer[s]” made by the committee *to itself*, which (when combined with other such disbursements) total more than \$47,000:

Full Name (Last, First, Middle Initial) <b>c. Royce White for Congress</b>				Date of Disbursement MM / DD / YYYY 06 / 28 / 2022	
Mailing Address 150 South Fifth Street Suite 3100				FEC Identification Number C C00806133	
City Minneapolis	State MN	Zip Code 55402		Amount of Each Disbursement this Period 10000.00	
Purpose of Disbursement Outgoing Wire Transfer				Transaction ID : SB17.14458	
Candidate Name				Memo Item	
Office Sought: <input checked="" type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President		Disbursement For: 2022 <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼			
State: MN District: 05					

16. A detailed list is attached,<sup>27</sup> but a summary of Royce White for Congress’s apparent personal use disbursements is provided in the table below:

Disbursement Descriptions <sup>28</sup>	Sum of Disbursements
Check	\$61,020.00
Outgoing Wire Transfer	\$47,803.00
Express / Nike.com / Asos.com / H&M / Dick’s Clothing / Crocs, Inc. / Macy’s / Cavenders / JCPenney	\$8,950.35
Best Buy	\$8,354.90
Amazon.com	\$6,410.13
LIMO & CAR SVCS / Showtime Transpo	\$5,100.47
Guitar Center	\$3,317.78
Target	\$3,184.54
Westshore Bar / Gold Rush Cabaret Miami FL / InCrowd Life Dallas TX / 5AM Theater	\$5,489.25
Life Time Fitness	\$1,885.77
Kalahari Resort Wisconsin	\$1,013.58

<sup>27</sup> Detailed List of Personal Use Disbursements, Royce White for Congress (attached as Ex. B).

<sup>28</sup> The reported recipient for nearly all of the disbursements incorporated in this table is the committee itself, Royce White for Congress, which is an obvious problem with the committee’s reporting; the disclosure reports do not list the actual recipients of the funds disbursed. Moreover, Royce White for Congress’s disbursement descriptions do not provide the “purpose” of the payment; indeed, virtually all of the descriptions appear to be basic transaction information copy/pasted from a credit card statement. The descriptions in this table, which are excerpted from the committee’s reports, appear to identify the vendor receiving payment—but not what was actually purchased or the “purpose” of the disbursement. See 11 C.F.R. § 104.3(b)(3)(i)(A) (“As used in 11 CFR 104.3(b)(3), *purpose* means a brief statement or description of *why the disbursement was made.*” emphasis added)).

Walgreens	\$870.28
Sally Beauty	\$748.04
Wal-mart / WM Supercenter	\$645.94
Checking W/D	\$450.00
Bed Bath & Beyond	\$442.95
Homegoods	\$365.52
Onnit	\$365.22
Flight Expense - Headphones	\$324.91
Dick's Sporting Goods	\$280.96
Epic Wate Grand Prairie TX	\$246.75
Claire's	\$124.66
Dribbleup.com	\$80.60
Spalon Montage	\$45.00
<b>Grand Total</b>	<b>\$157,520.60</b>

## SUMMARY OF THE LAW

### *Federal Reporting Requirements*

17. FECA requires each treasurer of a political committee to file regular reports of receipts and disbursements with the Commission.<sup>29</sup> Each report must provide, *inter alia*, the total amount of all disbursements, along with the total disbursements in specific categories—*e.g.*, operating expenditures, loan repayments, contribution refunds—that the committee has made for the reporting period and the election cycle (for a candidate-authorized committee),<sup>30</sup> as well as itemized information regarding the name and address of each person to whom the committee makes an expenditure or other disbursement aggregating

<sup>29</sup> 52 U.S.C. § 30104(a)(1); 11 C.F.R. § 104.1(a).

<sup>30</sup> 52 U.S.C. § 30104(b)(4). FECA defines an expenditure to include “any purchase, payment, distribution, loan, advance, deposit, or gift of money or anything of value, made by any person for the purpose of influencing any election for Federal office.” *Id.* § 30101(9)(A)(i).

more than \$200 per election cycle (for a candidate-authorized committee), as well as the date, amount, and purpose of such payments.<sup>31</sup>

18. A committee’s failure to accurately disclose its disbursements leaves voters in the dark about how the committee is spending donors’ money—denying voters their basic informational interest in knowing “where political campaign money comes from and how it is spent,”<sup>32</sup> and undermining the bedrock transparency necessary for voters to meaningfully evaluate candidates and “make informed decisions.”<sup>33</sup>
19. 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,<sup>34</sup> as well as the prohibition of coordination between campaigns and outside spending groups—*e.g.*, super PACs and “dark money” 501(c)(4) groups—through common vendors or former employees.<sup>35</sup>

#### *Personal Use*

20. Under FECA, a “contribution accepted by a candidate, and any other donation received” to support a federal officeholder’s official duties, “shall not be converted by any person to personal use.”<sup>36</sup> Any such contribution or donation is converted to personal use if it “is used to fulfill any commitment, obligation, or expense of a person that would exist

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<sup>31</sup> 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.”).

<sup>32</sup> *Buckley v. Valeo*, 424 U.S. 1, 66 (1976).

<sup>33</sup> *Citizens United v. FEC*, 558 U.S. 310, 370 (2010).

<sup>34</sup> *See* 52 U.S.C. § 30114(b); 11 C.F.R. § 113.1(g).

<sup>35</sup> *See* 11 C.F.R. §§ 109.20, 109.21(d)(4), (5).

<sup>36</sup> 52 U.S.C. § 30114(a), (b)(1). *But see* 11 C.F.R. § 113.1(g) (“Personal use means any *use of funds in a campaign account* of a present or former candidate to fulfill a commitment, obligation or expense of any person that would exist irrespective of the candidate’s campaign or duties as a Federal officeholder.” (emphasis added)).



irrespective of the candidate’s election campaign or individual’s duties as a holder of Federal office.”<sup>37</sup>

21. Commission regulations set forth certain categories of expenses which, when paid with campaign funds, constitute *per se* personal use—including, *e.g.*, “household food items,”<sup>38</sup> “clothing, other than items of *de minimis* value that are used in the campaign,”<sup>39</sup> and “admission to a sporting event, concert, theater or other form of entertainment, unless part of a specific campaign or officeholder activity.”<sup>40</sup>
22. For all other expenses, including legal, travel, and meal expenses, the “Commission will determine, on a case-by-case basis, whether” the use of campaign funds “would exist irrespective of the candidate’s campaign or duties as a Federal officeholder, and therefore [constitute] personal use.”<sup>41</sup>

#### CAUSES OF ACTION

##### COUNT I:

##### **ROYCE WHITE FOR SENATE HAS FAILED TO ACCURATELY AND COMPLETELY REPORT ITS CAMPAIGN EXPENDITURES**

23. The available information provides reason to believe Royce White for Senate has failed to report its disbursements, as required by FECA.
24. Since registering with the Commission in September 2023, Royce White for Senate has reported only *one* disbursement, for just \$216.38, which it made on March 31, 2024, to “Anedot” for “Credit Card Processing Fees.”<sup>42</sup> Anedot appears to be a digital platform

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<sup>37</sup> 52 U.S.C. § 30114(b)(2).

<sup>38</sup> 11 C.F.R. § 113.1(g)(1)(i)(A).

<sup>39</sup> *Id.* § 113.1(g)(1)(i)(C).

<sup>40</sup> *Id.* § 113.1(g)(1)(i)(F).

<sup>41</sup> *Id.* § 113.1(g)(1)(ii).

<sup>42</sup> *See supra* note 9.

used to record and manage financial transactions; it is one of the two fundraising platforms that appears on White’s campaign website.<sup>43</sup>

25. However, there is ample indication that Royce White for Senate has incurred other expenses and made disbursements that it has simply not disclosed. The campaign has a polished website that appears to have been crafted by a professional vendor, and the website features a disclaimer statement indicating that it is “Paid for by Royce White for Senate.”<sup>44</sup> Yet no disbursement of any kind related to the creation or maintenance of the site, or even a payment for its web address and domain registration, appears on the campaign’s disclosure reports.
26. Similarly, White announced his campaign with a video, over two minutes long, that appears to have been professionally crafted and also features a disclaimer statement indicating that it was paid for by the campaign.<sup>45</sup> Yet the campaign has reported no disbursements related to the creation of this video.
27. The campaign website solicits donations not only through Anedot, but also through WinRed, the online fundraising platform used by many candidates and organizations associated with the Republican Party.<sup>46</sup> Indeed, White’s campaign has reported receiving contributions earmarked through WinRed’s platform.<sup>47</sup> Yet White’s campaign has reported no disbursements to WinRed for the use of its online fundraising services.
28. These specific illustrations of the disconnect between White’s Senate campaign’s operation—which is plainly incurring expenses and making payments to advance White’s

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<sup>43</sup> See *supra* note 10–11.

<sup>44</sup> See *supra* note 11.

<sup>45</sup> See *supra* note 13.

<sup>46</sup> See *supra* note 11.

<sup>47</sup> See Royce White for Senate, 2024 Apr. Quarterly Report, *supra* note 8, at 5 (disclosing a \$250 “Contribution Earmarked through WINRED PAC”).

candidacy—and the wholesale lack of reported disbursements on the campaign’s disclosure reports provide reason to believe White’s 2024 campaign committee has deliberately failed to comply with FECA’s basic reporting requirements.

29. White’s 2024 Senate campaign’s failure to report virtually any campaign disbursements is particularly brazen in light of the fact that White has previously run for federal office and is at least somewhat familiar with the requirement that campaigns must report their disbursements.<sup>48</sup> Indeed, White’s failure to report his 2024 campaign disbursements must be viewed in light of his previous campaign’s apparent conversion of over \$157,000 in campaign funds to personal use, as explained in Count II, below.
30. As such, the overall information supports finding reason to believe Royce White for Senate has violated 52 U.S.C. § 30104(b) by failing to report its disbursements.

**COUNT II:**  
**ROYCE WHITE AND ROYCE WHITE FOR CONGRESS APPEAR TO HAVE CONVERTED  
CAMPAIGN FUNDS TO PERSONAL USE**

31. The overall record indicates that White and Royce White for Congress, White’s 2022 congressional campaign, violated FECA by converting campaign funds to personal use. Royce White for Congress reported disbursing over \$157,000 to a variety of vendors for clothing, cosmetics, jewelry, resort charges, fitness, and entertainment, including at strip clubs and nightclubs.
32. The nature and descriptions of the disbursements at issue clearly indicate that they were made to cover personal obligations, not campaign expenses. For instance, Royce White for Congress reported over \$5,400 in payments for various entertainment and nightlife

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<sup>48</sup> See Sollenberger, *supra* note 24 (“Asked about the spending, White told The Daily Beast, ‘That’s all campaign stuff,’ adding, ‘Every dollar was spent on the campaign for campaign reasons.’”).

expenses, such as “Gold Rush Cabaret” in Miami, FL,<sup>49</sup> as well as InCrowd Life and 5Am Theater in Dallas, TX.<sup>50</sup> These payments are clear violations of FECA’s personal use prohibition as implemented by the Commission’s regulations, which explicitly prohibit using campaign funds for “admission to a sporting event, concert, theater or other form of entertainment, unless part of a specific campaign or officeholder activity.”<sup>51</sup>

33. White’s campaign also reported spending thousands of dollars at clothing retailers, including Express, H&M, and Cavenders, as well as at general purpose “big box” retail outlets like Amazon.com, Walmart, and Target. Because the campaign failed to provide the requisite “purpose” descriptions for these disbursements, it is unclear whether any of these payments were for campaign purposes. But at least some of these payments, even without more information, appear to be prohibited under FECA’s personal use prohibition and the Commission’s regulations, which treat as *per se* personal use any payments for “clothing” that are not for “items of *de minimis* value that are used in the campaign.”<sup>52</sup>

34. In addition, Royce White for Congress also reported other disbursements that facially appear to be personal in nature and would exist irrespective of his candidacy. These include campaign disbursements of over \$8,000 at electronics retailer Best Buy, and smaller amounts for electronics, software, and other personal health payments: the

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<sup>49</sup> Sollenberger, *supra* note 24 (“At five in the morning one week after Republican Royce White lost his 2022 Minnesota congressional primary, his campaign shelled out more than \$1,200 in donor funds to a vendor 1,800 miles away not typically associated with political expenses—an all-nude strip club in Miami, Florida, called ‘Gold Rush Cabaret.’); see <https://goldrushcabaret.com/> (last viewed June 5, 2024).

<sup>50</sup> Sollenberger, *supra* note 24 (“The [White] campaign also splashed out \$1,560 at the FiveAm Theater, an ‘exclusive after hours entertainment venue’ in Dallas, with another \$960 the same night to INCrowd Life, a local party company.”).

<sup>51</sup> 11 C.F.R. § 113.1(g)(1)(i)(F).

<sup>52</sup> *Id.* § 113.1(g)(1)(i)(C).

campaign reported spending over \$1,800 at “Life Time Fitness,” \$748 at “Sally Beauty Cosmetics,” and roughly \$365 at “Onnit,” a vendor that offers health supplements and fitness equipment. White’s campaign also paid just over \$1,000 in September 2022 to Kalahari Resorts, an African safari-themed waterpark and resort in Wisconsin Dells, WI. It beggars belief that any of these expenses were genuinely campaign related; all of these payments appear to be of a personal nature and would exist “irrespective” of White’s candidacy for office.<sup>53</sup>

35. White’s 2022 campaign also reported disbursing—to itself— a total of over \$100,000 for “checks,” “outgoing wire transfers,” and cash withdrawals (“checking W/Ds”) from the campaign’s account. It is wholly unclear what these funds were actually used for; that complete lack of transparency, in view of the campaign’s prolific spending on clothing, entertainment, vacations, and personal items indicates an obvious effort to conceal personal use by moving funds out of the campaign’s account, ensuring that the actual use of those funds remained hidden from the public.
36. In response to media scrutiny of his 2022 campaign’s apparent misuse of donors’ money, White appeared to wholly dismiss the personal use of campaign funds, reportedly commenting, “If the FEC wants to fine us, that’s completely fine, there are much bigger scams with political campaigns.”<sup>54</sup> He also reportedly offered a blanket denial of misusing his donors’ funds, asserting, “That’s all campaign stuff,” and “[e]very dollar was spent on the campaign for campaign reasons.”<sup>55</sup> These reductive, summary assertions offer no genuine explanation as to how these numerous payments from the campaign’s

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<sup>53</sup> See 52 U.S.C. § 30114(b)(2).

<sup>54</sup> Sollenberger, *supra* note 24.

<sup>55</sup> *Id.*

account, some of which post-dated the formal end of White’s 2022 candidacy, were bona fide campaign expenditures and not the payment of personal obligations that would have existed irrespective of White’s candidacy. Indeed, these charges appear to indicate that White was simply enriching himself at his donors’ expense, both before and after losing in the 2022 primary election.

37. As such, there is reason to believe White and Royce White for Congress violated 52 U.S.C. § 30114(b) by converting campaign funds to personal use, and that Royce White for Congress sought to obscure this campaign of misconduct through egregious violations of FECA’s reporting requirements at 52 U.S.C. § 30104(b).

• • •

38. Furthermore, the facts in this matter support finding reason to believe that the aforementioned violations of FECA were knowing and willful, and that the treasurers of White’s two campaign committees should be held personally liable.

39. A violation of FECA is knowing and willful when the “acts were committed with full knowledge of all the relevant facts and a recognition that the action is prohibited by law.”<sup>56</sup> This standard does not require proving knowledge of the specific statute or regulation a person violated.<sup>57</sup> Rather, it is sufficient to demonstrate that a respondent “acted voluntarily and was aware that his conduct was unlawful.”<sup>58</sup> This awareness may be shown through circumstantial evidence, such as a person’s efforts to disguise their actions.<sup>59</sup>

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<sup>56</sup> 122 Cong. Rec H3778 (daily ed. May 3, 1976).

<sup>57</sup> See *United States v. Danielczyk*, 917 F. Supp. 2d 573, 579 (E.D. Va. 2013).

<sup>58</sup> *Id.*

<sup>59</sup> *United States v. Hopkins*, 916 F.2d 207, 213–15 (5th Cir. 1990).

40. In addition, the treasurer of a political committee may be held personally liable for violations of FECA when it appears that, while serving as treasurer, they knowingly and willfully violated FECA or Commission regulations or recklessly failed to fulfill the duties imposed by law.<sup>60</sup>
41. The facts indicate that White, Royce White for Congress, and Royce White for Senate knowingly and willfully violated FECA because they engaged in a clear, concerted effort to conceal or disguise their actions, evidencing the requisite knowledge that their conduct was unlawful.
42. Specifically, White and his 2022 campaign committee, Royce White for Congress, appear to have disbursed a substantial sum, over \$157,000, to pay for expenses that would exist irrespective of White’s campaign, and over two-thirds of that sum—over \$100,000—was in fact siphoned from the campaign’s account for unknown purposes using checks, wire transfers, and cash withdrawals. The vast majority of the committee’s transactions failed to disclose the true recipient of the funds, nor did the committee disclose the required descriptions of the transactions’ “purpose.”<sup>61</sup> That White and his campaign appear to have deliberately concealed the recipients and true purposes for which this six-figure sum was drawn from the campaign’s account is deeply concerning and strongly indicates an effort to conceal the use of campaign funds to pay for personal expenses.
43. Moreover, White and his 2024 campaign committee, Royce White for Senate, have failed to even attempt to disclose their disbursements as required under FECA, reporting only a single disbursement of less than \$250. This wholesale failure to comply with FECA’s

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<sup>60</sup> Statement of Policy Regarding Treasurers Subject to Enforcement Proceedings, 70 Fed. Reg. 3, 4–5 (Jan. 3, 2005) (“Treasurer Policy”).

<sup>61</sup> *See supra* note 28.

disclosure requirements by a candidate that previously sought federal office—and who appears to have used his previous campaign to unlawfully pay for a wide variety of personal expenses—strongly indicates a deliberate effort to conceal the campaign’s additional illegal use of campaign funds to pay for personal expenses.

44. Accordingly, the Commission should find reason to believe these violations of FECA were knowing and willful.<sup>62</sup>

45. In addition, the treasurers for both committees—Royce White for Congress and Royce White for Senate—that signed these egregiously false disclosure reports should be held personally liable, as they appear to have deliberately or recklessly failed to ensure that the reports they filed, and certified as accurate, were in fact accurate and complete. As such, the treasurers for Royce White for Congress and Royce White for Senate should be held personally liable for their respective committees’ violations of FECA, as set forth in the Commission’s policy regarding treasurer liability.<sup>63</sup>

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<sup>62</sup> See 52 U.S.C. §§ 30109(a)(5), (d).

<sup>63</sup> See Treasurer Policy, *supra* note 60.



**PRAYER FOR RELIEF**

46. Wherefore, the Commission should find reason to believe that White, Royce White for Senate, and Royce White for Congress violated 52 U.S.C. § 30101 *et seq.*, and conduct an immediate investigation under 52 U.S.C. § 30109(a)(2).
47. 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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/s/ Roger G. Wieand  
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Campaign Legal Center  
1101 14th Street NW, Suite 400  
Washington, DC 20005  
Counsel to the Campaign Legal Center,  
Roger G. Wieand

June 6, 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 Roger G. Wieand



Roger G. Wieand

State of Florida

County of Charlotte

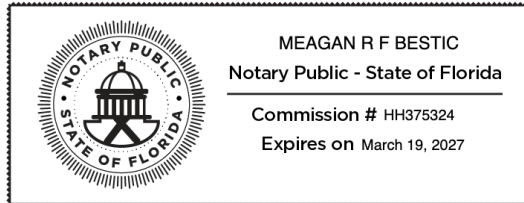
Sworn to and subscribed before me this 6th day of June 2024, by Roger G Wieand.

Personally Known OR  Produced Identification    Type of Identification Produced DRIVER LICENSE



Meagan R F Bestic

Notary Public



Notarized remotely online using communication technology via Proof.

**VERIFICATION**

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

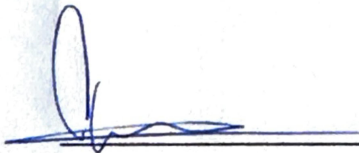
Sworn pursuant to 18 U.S.C. § 1001.

For Complainant Campaign Legal Center



Saurav Ghosh, Esq.

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



Notary Public



# EXHIBIT A

Click Below to Donate on Anedot



Click Below to Donate on WinRed



# EXHIBIT B

<i><b>RWFC Reported Disbursement Recipient</b></i>	<i><b>RWFC Reported Disbursement Description</b></i>	<i><b>Date</b></i>	<i><b>Amount</b></i>
ROYCE WHITE FOR CONGRESS	CHECK	6/23/22	\$ 25,000.00
ROYCE WHITE FOR CONGRESS	CHECK	7/18/22	\$ 15,000.00
ROYCE WHITE FOR CONGRESS	OUTGOING WIRE TRANSFER	6/28/22	\$ 10,000.00
ROYCE WHITE FOR CONGRESS	CHECK #2582	8/18/22	\$ 6,000.00
ROYCE WHITE FOR CONGRESS	OUTGOING WIRE TRANSFER	7/14/22	\$ 5,127.00
ROYCE WHITE FOR CONGRESS	CHECK #2581	8/9/22	\$ 5,000.00
ROYCE WHITE FOR CONGRESS	OUTGOING WIRE TRANSFER	7/27/22	\$ 5,000.00
ROYCE WHITE FOR CONGRESS	OUTGOING WIRE TRANSFER	7/5/22	\$ 4,602.00
ROYCE WHITE FOR CONGRESS	CHECK	6/3/22	\$ 4,305.00
ROYCE WHITE FOR CONGRESS	OUTGOING WIRE TRANSFER	6/28/22	\$ 4,200.00
ROYCE WHITE FOR CONGRESS	OUTGOING WIRE TRANSFER	6/28/22	\$ 3,750.00
ROYCE WHITE FOR CONGRESS	OUTGOING WIRE TRANSFER	7/14/22	\$ 3,708.00
ROYCE WHITE FOR CONGRESS	OUTGOING WIRE TRANSFER	7/5/22	\$ 3,566.00
ROYCE WHITE FOR CONGRESS	475041 PURCHASE 05/10 17:03 BEST BUY #4 MINNETONKA MN 06572400 213060002777	5/11/22	\$ 2,665.65
ROYCE WHITE FOR CONGRESS	38892 POS PURCHASE 05/25 16:17 AMZN MKTP US*1R3 AMZN.COM/BILL WA 00000000 038892	5/26/22	\$ 2,623.56
ROYCE WHITE FOR CONGRESS	OUTGOING WIRE TRANSFER	8/4/22	\$ 2,500.00
ROYCE WHITE FOR CONGRESS	704092 PURCHASE 08/03 11:03 BEST BUY #180 FRISCO TX 06584301 221538000175	8/3/22	\$ 2,269.87
ROYCE WHITE FOR CONGRESS	714307 PURCHASE 06/16 19:10 BEST BUY #180 FRISCO TX 06584301 216889001323	6/17/22	\$ 2,078.38
ROYCE WHITE FOR CONGRESS	OUTGOING WIRE TRANSFER	6/29/22	\$ 2,000.00
ROYCE WHITE FOR CONGRESS	72059 PURCHASE 05/14 16:01 GUITAR CENTER #3 BLOOMINGTON MN 07544636 072059	5/16/22	\$ 1,684.51
ROYCE WHITE FOR CONGRESS	668946 PURCHASE 04/14 14:28 GUITAR CENTER #3 MAPLE GROVE MN 07544639 668946	4/15/22	\$ 1,633.27
ROYCE WHITE FOR CONGRESS	148104 PURCHASE 08/29 02:40 SQ *EXPRESS LIMO MCDONOUGH GA 77827301 22410214810	8/29/22	\$ 1,632.18
ROYCE WHITE FOR CONGRESS	OUTGOING WIRE TRANSFER	5/16/22	\$ 1,600.00
ROYCE WHITE FOR CONGRESS	77849 POS PURCHASE 07/10 07:58 5AM THEATER 214-9158744 TX 77338443 077849	7/11/22	\$ 1,559.25
ROYCE WHITE FOR CONGRESS	28625 POS PURCHASE 08/22 20:01 SHOWTIME TRANSP0 727-4177287 FL 00737587 028625	8/23/22	\$ 1,497.35
ROYCE WHITE FOR CONGRESS	0023 POS PURCHASE 08/13 01:53 WESTSHORE BAR AN 813-2889200 FL 77666284 000023	8/15/22	\$ 1,300.00
ROYCE WHITE FOR CONGRESS	OUTGOING WIRE TRANSFER	6/17/22	\$ 1,250.00
ROYCE WHITE FOR CONGRESS	2442 POS PURCHASE 08/16 05:00 GOLD RUSH CABARE MIAMI FL 88888888 002442	8/17/22	\$ 1,232.00
ROYCE WHITE FOR CONGRESS	798484 PURCHASE 06/01 12:21 AMAZON.COM*1X41E SEATTLE WA 00000101 435CP74BT6Y1	6/1/22	\$ 1,135.43
ROYCE WHITE FOR CONGRESS	CHECK	7/5/22	\$ 1,060.00
ROYCE WHITE FOR CONGRESS	378971 PURCHASE 07/25 13:29 DICK'S CLOTHING& FRISCO TX 00234819 378971	7/25/22	\$ 991.13
ROYCE WHITE FOR CONGRESS	10453 POS PURCHASE 09/02 00:36 KALAHARI RESORT WISCONSIN DEL WI 73912071 010453	9/2/22	\$ 970.92
ROYCE WHITE FOR CONGRESS	196046 POS PURCHASE 07/09 08:33 SQ *INCROWD LIFE DALLAS TX 77827301 219008196046	7/11/22	\$ 960.00
ROYCE WHITE FOR CONGRESS	66966 POS PURCHASE 08/17 09:04 SHOWTIME TRANSP0 727-4177287 FL 00737587 066966	8/18/22	\$ 910.94
ROYCE WHITE FOR CONGRESS	52934 RECUR DDA PMT 08/16 14:12 LIMO & CAR SVCS. HTTPSCARSERVI FL CWHEZTC0 05293	8/17/22	\$ 850.00
ROYCE WHITE FOR CONGRESS	CHECK #2501	5/20/22	\$ 800.00
ROYCE WHITE FOR CONGRESS	CHECK #2526	5/10/22	\$ 700.00

ROYCE WHITE FOR CONGRESS	CHECK #2502	5/23/22	\$ 650.00
ROYCE WHITE FOR CONGRESS	848056 PURCHASE 06/24 14:03 DICK'S CLOTHING& MADISON WI 00080391 848056	6/24/22	\$ 593.20
ROYCE WHITE FOR CONGRESS	6740 POS PURCHASE 06/20 08:13 G* GOAT490#96227 HTTPSWWW.GOAT CA PUBSTCXP 006740	6/21/22	\$ 589.50
ROYCE WHITE FOR CONGRESS	644252 PURCHASE 05/14 19:08 BEST BUY #4 MINNETONKA MN 06572400 213572002145	5/16/22	\$ 569.09
ROYCE WHITE FOR CONGRESS	910790 PURCHASE 05/19 07:45 AMAZON.COM*1L9EB SEATTLE WA 00000000 DG1LWO	5/19/22	\$ 532.25
ROYCE WHITE FOR CONGRESS	40449 POS PURCHASE 06/10 01:23 TARGET 00 CRYSTAL MN 074 040449	6/13/22	\$ 516.68
ROYCE WHITE FOR CONGRESS	OUTGOING WIRE TRANSFER	6/17/22	\$ 500.00
ROYCE WHITE FOR CONGRESS	CHECK	6/16/22	\$ 490.00
ROYCE WHITE FOR CONGRESS	0017 POS PURCHASE 04/20 18:32 K & G MINNESOTA SAINT LOUIS P MN 00007530 000017	4/21/22	\$ 479.32
ROYCE WHITE FOR CONGRESS	375067 PURCHASE 05/18 11:12 AMAZON.COM*1L9CU SEATTLE WA 00000101 4K9LJA18Z3FI	5/18/22	\$ 467.72
ROYCE WHITE FOR CONGRESS	19428 PURCHASE 04/30 14:36 TARGET T-2189 MINNEAPOLIS MN 22189113 113025	5/2/22	\$ 462.33
ROYCE WHITE FOR CONGRESS	CHECK #2503	5/25/22	\$ 450.00
ROYCE WHITE FOR CONGRESS	880762 PURCHASE 05/07 18:37 BED BATH & BEYON MINNETONKA MN 08913214 2127350001	5/9/22	\$ 442.95
ROYCE WHITE FOR CONGRESS	421367 PURCHASE 06/07 10:30 AMAZON.COM*UA2K6 SEATTLE WA 00000101 207M7YLHZNGC	6/7/22	\$ 441.87
ROYCE WHITE FOR CONGRESS	82907 POS PURCHASE 08/13 21:27 WESTSHORE BAR AN 813-2889200 FL 77665880 082907	8/15/22	\$ 438.00
K&G FASHION SUPERSTORE	CLOTHES FOR CAMPAIGN VIDEOS AND COMMERCIALS	4/1/22	\$ 409.10
ROYCE WHITE FOR CONGRESS	14490 PURCHASE 05/07 16:25 NORDSTROM #0283 MINNETONKA MN 38912001 003074	5/9/22	\$ 407.52
ROYCE WHITE FOR CONGRESS	CHECK	6/6/22	\$ 400.00
HEIMIE'S HABERDASHERY	HEIMIE'S HABERDASHERY	3/9/22	\$ 377.00
ROYCE WHITE FOR CONGRESS	17994 POS PURCHASE 06/11 07:31 NIKE INC 503-671-6453 OR 0001 017994	6/13/22	\$ 372.69
ROYCE WHITE FOR CONGRESS	49041 PURCHASE 04/19 16:58 SALLY BEAUTY #08 ST LOUIS PARK MN 54793001 013068	4/20/22	\$ 369.00
NEW BALANCE	SHOE PURCHASE FOR DOOR KNOCKING	4/4/22	\$ 365.91
ROYCE WHITE FOR CONGRESS	34151 PURCHASE 05/06 13:41 HOMEGOODS #0581 EDINA MN 09332001 000859	5/6/22	\$ 365.52
ROYCE WHITE FOR CONGRESS	20607 POS PURCHASE 06/22 21:03 TARGET 00 CRYSTAL MN 072 020607	6/23/22	\$ 363.39
ROYCE WHITE FOR CONGRESS	192017 PURCHASE 07/07 16:30 BEST BUY #1773 FRISCO TX 06583759 218885001961	7/8/22	\$ 326.74
INMOTION	FLIGHT EXPENSE - HEADPHONES	3/28/22	\$ 324.91
ROYCE WHITE FOR CONGRESS	2034 POS PURCHASE 05/29 15:54 EXPRESS.COM 888-397-1980 OH 00000078 002034	5/31/22	\$ 323.00
ROYCE WHITE FOR CONGRESS	CHECK	6/16/22	\$ 315.00
ROYCE WHITE FOR CONGRESS	11627 PURCHASE 07/11 14:16 MACY'S 671 PLANO TX D6710045 002109	7/11/22	\$ 311.00
ROYCE WHITE FOR CONGRESS	60055 POS PURCHASE 06/10 19:15 TARGET 00 MINNEAPOLIS MN 076 060055	6/13/22	\$ 302.89
ROYCE WHITE FOR CONGRESS	CHECK #2525	4/28/22	\$ 300.00
ROYCE WHITE FOR CONGRESS	834017 PURCHASE 08/04 15:31 DICK'S CLOTHING& FRISCO TX 00265135 834017	8/4/22	\$ 292.28
ROYCE WHITE FOR CONGRESS	276752 PURCHASE 05/14 13:50 K & G MINNESOTA SAINT LOUIS P MN 08277530 21346700	5/16/22	\$ 292.04
ROYCE WHITE FOR CONGRESS	0185 PURCHASE 07/16 15:19 CAVENDERS #11 PLANO TX 02112090 219714002615	7/18/22	\$ 290.09
ROYCE WHITE FOR CONGRESS	20273 POS PURCHASE 06/14 09:26 TARGET 00 CRYSTAL MN 072 020273	6/15/22	\$ 283.82
ROYCE WHITE FOR CONGRESS	1273 PURCHASE 06/07 11:56 DICKSPORTINGGOO MINNETONKA MN 00E98226 001273	6/7/22	\$ 280.96
ROYCE WHITE FOR CONGRESS	0176 PURCHASE 07/16 15:06 CAVENDERS #11 PLANO TX 02112090 219773001270	7/18/22	\$ 270.63
ROYCE WHITE FOR CONGRESS	15952 CHECKING W/D 04/15 21:49 US BANK ROBBINSDALE ROBBINSDALE MN SUS4V962 2889	4/18/22	\$ 250.00
ROYCE WHITE FOR CONGRESS	CHECK	6/7/22	\$ 250.00



ROYCE WHITE FOR CONGRESS	12498 POS PURCHASE 05/16 23:06 EXPRESS.COM 888-397-1980 OH 00000078 012498	5/17/22	\$ 230.00
ROYCE WHITE FOR CONGRESS	3231 POS PURCHASE 06/27 17:00 SP BOXRAW HTTPSBOXRAWUS DE ANCA4ITY 003231	6/28/22	\$ 227.99
ROYCE WHITE FOR CONGRESS	45440 PURCHASE 07/18 15:29 BEST BUY #180 FRISCO TX 06584301 219906000834	7/18/22	\$ 226.37
ROYCE WHITE FOR CONGRESS	778129 PURCHASE 05/28 11:53 AMAZON.COM*DU0LD SEATTLE WA 00000101 6LHZOWZ1HEW0	5/31/22	\$ 221.48
ROYCE WHITE FOR CONGRESS	533978 PURCHASE 07/05 13:02 DICK'S CLOTHING& FRISCO TX 00161712 533978	7/5/22	\$ 217.17
ROYCE WHITE FOR CONGRESS	51756 RECUR DDA PMT 07/01 01:59 LTF*LIFE TIME MO 888-430-6432 MN 00000000 051756	7/1/22	\$ 216.23
ROYCE WHITE FOR CONGRESS	82519 RECUR DDA PMT 08/01 11:29 LTF*LIFE TIME MO 888-430-6432 MN 00000000 082519	8/1/22	\$ 216.23
ROYCE WHITE FOR CONGRESS	22352 RECUR DDA PMT 09/01 12:59 LTF*LIFE TIME MO 888-430-6432 MN 00000000 022352	9/1/22	\$ 216.23
ROYCE WHITE FOR CONGRESS	71713 RECUR DDA PMT 10/01 13:26 LTF*LIFE TIME MO 888-430-6432 MN 00000000 071713	10/3/22	\$ 216.23
ROYCE WHITE FOR CONGRESS	615346 PURCHASE 05/07 17:52 11320-LULULEMON ST LOUIS PARK MN 101 212717615346	5/9/22	\$ 216.00
ROYCE WHITE FOR CONGRESS	95341 RECUR DDA PMT 05/01 02:13 LTF*LIFE TIME MO 888-430-6432 MN 00000000 095341	5/2/22	\$ 213.98
ROYCE WHITE FOR CONGRESS	953559 RECUR DDA PMT 06/01 11:34 LTF LIFE TIME MO CHANHASSEN MN 003 215211953559	6/1/22	\$ 213.98
ROYCE WHITE FOR CONGRESS	46193 RECUR DDA PMT 08/16 22:41 LIMO & CAR SVCS. HTTPSCARSERVI FL CWHEZTC0 04619	8/17/22	\$ 210.00
ROYCE WHITE FOR CONGRESS	35981 POS PURCHASE 06/01 05:29 SALLY BEAUTY #08 ST LOUIS PARK MN 82735981 035981	6/2/22	\$ 205.01
ROYCE WHITE FOR CONGRESS	CHECK	6/17/22	\$ 200.00
ROYCE WHITE FOR CONGRESS	523342 PURCHASE 06/12 13:00 WALGREENS STORE HOPKINS MN 99999999 523342	6/13/22	\$ 199.74
ROYCE WHITE FOR CONGRESS	46151 POS PURCHASE 05/04 03:21 SP BOXRAW HTTPSBOXRAWUS DE ANCA4ITY 046151	5/4/22	\$ 198.00
ROYCE WHITE FOR CONGRESS	44150 POS PURCHASE 07/31 03:29 ZSK*CE EPIC WATE GRAND PRAIRIE TX 00002737 044150	8/1/22	\$ 196.00
ROYCE WHITE FOR CONGRESS	20290 POS PURCHASE 06/14 08:17 TARGET 00 CRYSTAL MN 112 020290	6/15/22	\$ 193.53
ROYCE WHITE FOR CONGRESS	50482 PURCHASE 07/24 22:59 WM SUPERCENTER # FRISCO TX 58660010 102858	7/25/22	\$ 180.78
ROYCE WHITE FOR CONGRESS	24715 PURCHASE 07/05 12:26 SALLY BEAUTY #27 FRISCO TX 38943001 010685	7/5/22	\$ 174.03
ROYCE WHITE FOR CONGRESS	29585 POS PURCHASE 07/22 10:09 NIKE.COM 800-8066453 CA 00000000 029585	7/25/22	\$ 169.51
ROYCE WHITE FOR CONGRESS	361048 PURCHASE 05/12 06:29 AMAZON.COM*138CL SEATTLE WA 00000101 20BGMVCH6TYM	5/12/22	\$ 166.65
ROYCE WHITE FOR CONGRESS	74798 POS PURCHASE 08/07 19:29 JCPENNEY 2795 FRISCO TX 00000000 074798	8/8/22	\$ 162.36
ROYCE WHITE FOR CONGRESS	0019 POS PURCHASE 07/11 02:00 EXPRESS#0416 LUFKIN TX 00001756 000019	7/12/22	\$ 156.96
ROYCE WHITE FOR CONGRESS	10164 POS PURCHASE 06/10 23:48 ASOS.COM ASOS.COM GA 00000000 010164	6/13/22	\$ 156.25
ROYCE WHITE FOR CONGRESS	24872 POS PURCHASE 07/06 14:46 EQUINOX HOLDINGS NEW YORK NY 03832731 024872	7/7/22	\$ 156.00
ROYCE WHITE FOR CONGRESS	85343 POS PURCHASE 06/20 22:53 ASOS.COM ASOS.COM GA 00000000 085343	6/21/22	\$ 153.50
ROYCE WHITE FOR CONGRESS	41149 POS PURCHASE 07/03 15:05 TARGET 00 CRYSTAL MN 074 041149	7/5/22	\$ 146.40
ROYCE WHITE FOR CONGRESS	971302 PURCHASE 05/14 00:25 AMAZON.COM*1L60Q SEATTLE WA 00000101 6MNDXIAIETCV	5/16/22	\$ 146.21
ROYCE WHITE FOR CONGRESS	449062 PURCHASE 05/04 16:54 AMAZON.COM*1Q6WM SEATTLE WA 00000101 5EASIIZBKVL3	5/5/22	\$ 146.21
ROYCE WHITE FOR CONGRESS	14494 POS PURCHASE 06/05 18:19 TARGET 00 SHAKOPEE MN 171 014494	6/6/22	\$ 142.96
ROYCE WHITE FOR CONGRESS	56054 POS PURCHASE 04/12 02:29 LIFE TIME FITNES 888-430-6432 MN 00000000 056054	4/13/22	\$ 135.52
ROYCE WHITE FOR CONGRESS	413410 PURCHASE 06/16 18:19 DICK'S CLOTHING& DALLAS TX 00227694 413410	6/17/22	\$ 135.31
ROYCE WHITE FOR CONGRESS	504492 PURCHASE 07/07 23:08 WALGREENS STORE FRISCO TX 99999999 504492	7/8/22	\$ 134.49
ROYCE WHITE FOR CONGRESS	51774 PURCHASE 05/04 17:37 WM SUPERCENTER # BROOKLYN CENT MN 56250021 534889	5/5/22	\$ 133.77
ROYCE WHITE FOR CONGRESS	929113 PURCHASE 07/07 20:53 WALGREENS STORE FRISCO TX 99999999 929113	7/8/22	\$ 123.91
ROYCE WHITE FOR CONGRESS	293042 PURCHASE 05/09 11:39 AMAZON.COM*138YK SEATTLE WA 00000101 5GB3LS91MZW7	5/9/22	\$ 123.63
ROYCE WHITE FOR CONGRESS	16607 PURCHASE 10/01 15:49 BEST BUY 00 EDEN PRAIRIE MN 06566410 227451002683	10/3/22	\$ 122.44

ROYCE WHITE FOR CONGRESS	0019 POS PURCHASE 06/11 11:13 H&M0205 SAINT PAUL MN 00004701 000019	6/13/22	\$ 122.23
ROYCE WHITE FOR CONGRESS	36029 POS PURCHASE 04/13 10:40 ONNIT 5602072 WWW.ONNIT.COM TX 00000000 036029	4/14/22	\$ 117.35
ROYCE WHITE FOR CONGRESS	2585 POS PURCHASE 06/18 23:10 CROCS INC CROCS.COM CO 00000000 002585	6/21/22	\$ 115.97
ROYCE WHITE FOR CONGRESS	878878 PURCHASE 06/07 14:45 AMAZON.COM*EJ2S9 SEATTLE WA 00000101 72HTH07MLNFQ	6/8/22	\$ 109.95
ROYCE WHITE FOR CONGRESS	62441 POS PURCHASE 06/07 09:12 TARGET 00 CRYSTAL MN 076 062441	6/8/22	\$ 108.63
ROYCE WHITE FOR CONGRESS	31672 POS PURCHASE 05/08 12:34 TARGET 00 MINNEAPOLIS MN 073 031672	5/9/22	\$ 108.11
ROYCE WHITE FOR CONGRESS	0022 POS PURCHASE 06/22 04:06 EXPRESS#0120 MINNETONKA MN 00007860 000022	6/23/22	\$ 101.80
ROYCE WHITE FOR CONGRESS	0778 CHECKING W/D 06/25 23:44 1000 N. RUSH STREET CHICAGO IL T380T65 000465	6/27/22	\$ 100.00
ROYCE WHITE FOR CONGRESS	3951 CHECKING W/D 06/30 14:22 500 H ST NW WASHINGTON DC CS75785 002995	6/30/22	\$ 100.00
ROYCE WHITE FOR CONGRESS	CHECK	6/21/22	\$ 100.00
ROYCE WHITE FOR CONGRESS	382480 PURCHASE 07/05 14:30 MICHAELS STORES PLANO TX 001 218614382480	7/5/22	\$ 91.51
ROYCE WHITE FOR CONGRESS	97628 POS PURCHASE 06/12 17:58 DRIBBLEUP.CO*SMA DRIBBLEUP.COM NY 00000000 097628	6/13/22	\$ 91.37
ROYCE WHITE FOR CONGRESS	14446 PURCHASE 05/15 13:13 BEST BUY #4 MINNETONKA MN 06572400 213549002672	5/16/22	\$ 89.93
ROYCE WHITE FOR CONGRESS	14137 RECUR DDA PMT 07/12 02:43 ONNIT 5871965 WWW.ONNIT.COM TX 00000000 014137	7/13/22	\$ 85.57
ROYCE WHITE FOR CONGRESS	89684 RECUR DDA PMT 08/26 15:26 ONNIT 6006687 WWW.ONNIT.COM TX 00000000 089684	8/29/22	\$ 85.36
ROYCE WHITE FOR CONGRESS	1519 POS PURCHASE 04/08 07:02 NBW*NEW BALANCE 800-595-9138 MO 00000000 001519	4/8/22	\$ 84.99
ROYCE WHITE FOR CONGRESS	94453 RECUR DDA PMT 05/28 08:44 ONNIT 5748549 WWW.ONNIT.COM TX 00000000 094453	5/31/22	\$ 76.94
ROYCE WHITE FOR CONGRESS	43617 POS PURCHASE 06/21 16:09 TARGET 00 CRYSTAL MN 074 043617	6/22/22	\$ 73.27
ROYCE WHITE FOR CONGRESS	524279 PURCHASE 04/30 11:06 AMAZON.COM*136DA SEATTLE WA 00000101 3L8C7ARW2NJ0	5/2/22	\$ 73.09
ROYCE WHITE FOR CONGRESS	712357 PURCHASE 07/10 17:31 WALGREENS STORE FRISCO TX 99999999 712357	7/11/22	\$ 71.97
ROYCE WHITE FOR CONGRESS	10513 POS PURCHASE 06/18 08:51 TARGET 00 CHICAGO IL 111 010513	6/21/22	\$ 71.63
ROYCE WHITE FOR CONGRESS	72936 POS PURCHASE 06/11 03:16 WALGREENS #01751 MAPLEWOOD MN 00000000 072936	6/13/22	\$ 69.48
ROYCE WHITE FOR CONGRESS	155535 PURCHASE 07/12 14:13 WAL-MART SUPER C FRISCO TX 58660019 219315000023	7/12/22	\$ 69.19
ROYCE WHITE FOR CONGRESS	844045 PURCHASE 07/06 10:45 WAL-MART #1864 BROOKLYN PARK MN 24186401 844045	7/6/22	\$ 67.05
ROYCE WHITE FOR CONGRESS	48321 POS PURCHASE 06/06 02:59 CLAIRE'S #5897 BLOOMINGTON MN 34348321 048321	6/7/22	\$ 64.48
ROYCE WHITE FOR CONGRESS	28667 POS PURCHASE 05/31 23:31 WALGREENS #6730 HOPKINS MN 00000000 028667	6/1/22	\$ 62.49
ROYCE WHITE FOR CONGRESS	43188 POS PURCHASE 06/18 08:35 TARGET 00 CHICAGO IL 164 043188	6/21/22	\$ 60.24
ROYCE WHITE FOR CONGRESS	55002 POS PURCHASE 06/22 02:45 CLAIRE'S #6036 MINNETONKA MN 17155002 055002	6/23/22	\$ 60.18
ROYCE WHITE FOR CONGRESS	684510 PURCHASE 06/21 02:37 AMAZON.COM*X25RT SEATTLE WA 00000101 55QVIU5K6RVH	6/21/22	\$ 56.96
ROYCE WHITE FOR CONGRESS	76145 POS PURCHASE 06/05 03:43 WALGREENS #6730 HOPKINS MN 00000000 076145	6/6/22	\$ 56.62
ROYCE WHITE FOR CONGRESS	83009 POS PURCHASE 05/18 15:02 TARGET 00 MINNEAPOLIS MN 178 083009	5/19/22	\$ 55.86
ROYCE WHITE FOR CONGRESS	727897 PURCHASE 05/07 20:33 WALGREENS STORE HOPKINS MN 99999999 727897	5/9/22	\$ 54.37
ROYCE WHITE FOR CONGRESS	74453 POS PURCHASE 07/31 03:46 ZSK*CE EPIC WATE GRAND PRAIRIE TX 00002737 074453	8/1/22	\$ 50.75
ROYCE WHITE FOR CONGRESS	878943 PURCHASE 05/03 15:11 AMAZON.COM*1Q2KX SEATTLE WA 00000101 4XTR8BN1A9OW	5/4/22	\$ 49.42
ROYCE WHITE FOR CONGRESS	0601 PURCHASE 06/16 06:28 WM SUPERCENTER # BROOKLYN CENT MN 56250019 507642	6/16/22	\$ 48.94
ROYCE WHITE FOR CONGRESS	80606 POS PURCHASE 08/10 12:01 TARGET 00 MINNETONKA MN 088 080606	8/10/22	\$ 48.88
ROYCE WHITE FOR CONGRESS	0039 POS PURCHASE 06/11 11:33 H&M0205 SAINT PAUL MN 00004701 000039	6/13/22	\$ 46.39
ROYCE WHITE FOR CONGRESS	40584 POS PURCHASE 07/01 02:28 TARGET 00 FRISCO TX 174 040584	7/5/22	\$ 45.30
ROYCE WHITE FOR CONGRESS	91494 POS PURCHASE 05/06 08:14 SPALON MONTAGE E EDINA MN 60060281 091494	5/9/22	\$ 45.00

ROYCE WHITE FOR CONGRESS	21878 POS PURCHASE 05/15 00:57 TARGET 00 CRYSTAL MN 112 021878	5/16/22	\$ 43.00
ROYCE WHITE FOR CONGRESS	30454 POS PURCHASE 09/02 00:36 KALAHARI RESORT WISCONSIN DEL WI 73912071 030454	9/6/22	\$ 42.66
ROYCE WHITE FOR CONGRESS	221043 PURCHASE 06/22 08:28 AMAZON.COM*B12BV SEATTLE WA 00000101 1L3IRZ9V12ST	6/22/22	\$ 41.91
ROYCE WHITE FOR CONGRESS	409033 PURCHASE 06/09 16:32 AMAZON.COM*GK2G9 SEATTLE WA 00000101 5HYZWL93SRM0	6/10/22	\$ 38.69
ROYCE WHITE FOR CONGRESS	81727 POS PURCHASE 04/30 16:18 TARGET 00 MINNEAPOLIS MN 158 081727	5/2/22	\$ 36.35
ROYCE WHITE FOR CONGRESS	776545 PURCHASE 05/28 11:52 AMAZON.COM*1R026 SEATTLE WA 00000101 5TF7YHKKE6PT	5/31/22	\$ 35.46
ROYCE WHITE FOR CONGRESS	39109 POS PURCHASE 05/18 18:47 WURK LLC 952-3346260 MN 76250249 039109	5/19/22	\$ 35.00
ROYCE WHITE FOR CONGRESS	38818 POS PURCHASE 06/08 07:36 WURK LLC 952-3346260 MN 76250249 038818	6/9/22	\$ 35.00
ROYCE WHITE FOR CONGRESS	40352 POS PURCHASE 07/08 06:09 WURK LLC 952-3346260 MN 76250249 040352	7/11/22	\$ 35.00
ROYCE WHITE FOR CONGRESS	64920 POS PURCHASE 08/08 04:59 WURK LLC 952-3346260 MN 76250249 064920	8/9/22	\$ 35.00
ROYCE WHITE FOR CONGRESS	77771 POS PURCHASE 09/08 02:28 WURK LLC 952-3346260 MN 76250249 077771	9/9/22	\$ 35.00
ROYCE WHITE FOR CONGRESS	52205 RECUR DDA PMT 10/08 03:26 WURK LLC 952-3346260 MN 76250249 052205	10/11/22	\$ 35.00
ROYCE WHITE FOR CONGRESS	82547 POS PURCHASE 06/05 19:46 TARGET 00 SHAKOPEE MN 158 082547	6/6/22	\$ 34.62
ROYCE WHITE FOR CONGRESS	293045 PURCHASE 05/09 11:39 AMAZON.COM*1L6LM SEATTLE WA 00000101 44BSMUZT7UDZ	5/9/22	\$ 32.99
ROYCE WHITE FOR CONGRESS	800215 PURCHASE 05/25 19:46 WALGREENS STORE ROBBINSDALE MN 99999999 800215	5/26/22	\$ 29.94
ROYCE WHITE FOR CONGRESS	605912 PURCHASE 07/07 23:13 WALGREENS STORE FRISCO TX 99999999 605912	7/8/22	\$ 28.24
ROYCE WHITE FOR CONGRESS	154259 POS PURCHASE 05/09 08:07 AMAZON.COM*1373K SEATTLE WA 00000000 DCLWB5	5/9/22	\$ 28.00
ROYCE WHITE FOR CONGRESS	343249 PURCHASE 06/22 09:48 AMAZON.COM*KQ149 SEATTLE WA 00000101 2VH8819M1VJT	6/22/22	\$ 26.86
ROYCE WHITE FOR CONGRESS	70083 POS PURCHASE 06/28 00:02 TARGET 00 MINNEAPOLIS MN 177 070083	6/29/22	\$ 25.25
ROYCE WHITE FOR CONGRESS	61157 POS PURCHASE 06/14 19:53 TARGET 00 CRYSTAL MN 076 061157	6/15/22	\$ 23.69
ROYCE WHITE FOR CONGRESS	134879 PURCHASE 06/20 20:41 AMAZON.COM*5R8U5 SEATTLE WA 00000101 QMFMJ6KLPBBG	6/21/22	\$ 22.56
ROYCE WHITE FOR CONGRESS	28133 POS PURCHASE 05/24 09:05 WALGREENS #6730 HOPKINS MN 00000000 028133	5/25/22	\$ 21.96
ROYCE WHITE FOR CONGRESS	91277 POS PURCHASE 06/08 05:54 TARGET.COM * 800-591-3869 MN 00000000 091277	6/9/22	\$ 21.00
ROYCE WHITE FOR CONGRESS	343271 PURCHASE 06/22 09:48 AMAZON.COM*YB599 SEATTLE WA 00000101 1TRZXMD6210N	6/22/22	\$ 18.26
ROYCE WHITE FOR CONGRESS	774767 PURCHASE 05/28 11:53 AMAZON.COM*77199 SEATTLE WA 00000101 4TATGWOJZXF	5/31/22	\$ 17.18
ROYCE WHITE FOR CONGRESS	7990 POS PURCHASE 06/17 08:35 DRIBBLEUP.CO*MEM DRIBBLEUP.COM NY 00000000 007990	6/21/22	\$ 16.12
ROYCE WHITE FOR CONGRESS	77718 RECUR DDA PMT 07/17 22:27 DRIBBLEUP.COMEMB DRIBBLEUP.COM NY 00000000 07771	7/18/22	\$ 16.12
ROYCE WHITE FOR CONGRESS	6705 RECUR DDA PMT 08/17 05:35 DRIBBLEUP.COMEMB DRIBBLEUP.COM NY 00000000 006705	8/17/22	\$ 16.12
ROYCE WHITE FOR CONGRESS	44516 RECUR DDA PMT 09/17 10:05 DRIBBLEUP.COMEMB DRIBBLEUP.COM NY 00000000 04451	9/19/22	\$ 16.12
ROYCE WHITE FOR CONGRESS	56141 RECUR DDA PMT 10/17 11:03 DRIBBLEUP.COMEMB DRIBBLEUP.COM NY 00000000 05614	10/17/22	\$ 16.12
ROYCE WHITE FOR CONGRESS	507876 PURCHASE 04/22 10:08 WALGREENS STORE HOPKINS MN 99999999 507876	4/22/22	\$ 14.28
ROYCE WHITE FOR CONGRESS	42768 POS PURCHASE 06/05 18:43 TARGET 00 SHAKOPEE MN 174 042768	6/6/22	\$ 7.20
ROYCE WHITE FOR CONGRESS	606757 PURCHASE 06/16 17:34 BEST BUY/MHT #25 FARMER BRANCH TX 06585853 2167750	6/17/22	\$ 6.43
ROYCE WHITE FOR CONGRESS	70234 POS PURCHASE 05/18 23:28 TARGET 00 MINNEAPOLIS MN 157 070234	5/19/22	\$ 5.38
ROYCE WHITE FOR CONGRESS	82548 POS PURCHASE 06/05 19:46 TARGET 00 SHAKOPEE MN 158 082548	6/6/22	\$ 4.13
ROYCE WHITE FOR CONGRESS	12146 POS PURCHASE 08/10 18:52 WALGREENS #6730 HOPKINS MN 00000000 012146	8/11/22	\$ 2.79