

BEFORE THE FEDERAL ELECTION COMMISSION

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

v. MUR No. _____

MATT GAETZ
FRIENDS OF MATT GAETZ and
STEVEN G. MARTIN in his official
capacity as treasurer
P.O. Box 168
Mary Ester, FL 32569

COMPLAINT

1. Former Congressman Matt Gaetz and his 2024 congressional campaign committee, Friends of Matt Gaetz, have reported paying Stripe, a payment processing platform, over \$1.2 million for “e-merchant fees” this election cycle—an amount that vastly exceeds what *any other political committee* paid Stripe during the 2024 election cycle. In fact, Gaetz’s campaign, which reported raising just \$6.28 million during the 2024 cycle—including \$2.8 million from about 49,000 itemized individual contributions and \$3.4 million in unitemized contributions—reported paying Stripe more than *double* what the next highest spender, a joint fundraising committee (“JFC”) that raised over \$1.19 billion this election cycle, reported paying Stripe.
2. Overall, Gaetz’s campaign has reported spending an implausible amount on e-merchant fees—with its \$1.2 million in payments to Stripe representing far more than the amounts paid to Stripe by political committees raising hundreds of millions of dollars from millions of donors all across the country. As such, the Gaetz campaign’s reported

payment of over \$1.2 million to Stripe appears to indicate a glaring reporting error regarding the recipients or purposes for which these campaign funds were paid.

3. Based on Stripe’s fee structure for processing online contributions to political committees, which is based on the number and amount of contributions a committee receives, the Gaetz campaign should have owed Stripe no more than approximately \$97,000 in “e-merchant fees” for its itemized contributions, and as explained herein, the additional \$1.1 million the Gaetz campaign reportedly paid to Stripe cannot reasonably be attributed to Stripe processing the Gaetz campaign’s unitemized contributions. Therefore, the campaign’s reports to date contain a substantial sum of reported disbursements to Stripe that appear to be inaccurate on their face. Since the Gaetz campaign only spent about \$6.28 million in total during the 2024 election cycle, this \$1.1 million in additional payments to Stripe represents as much as one-sixth of the campaign’s operating expenses, whose true purposes are currently being concealed from the public.
4. The Federal Election Campaign Act (“FECA”) requires committees to file accurate reports of their disbursements, including the recipient and purpose of operating expenditures. When campaigns misreport their spending, they deny the public information about their activities and the people and entities they associate with— information that voters have a right to know when deciding how to vote. False or inaccurate reports also prevent the Federal Election Commission (the “FEC” or “Commission”) from doing its job in making sure political committees are raising and spending money lawfully.

5. As set forth herein, there is reason to believe Gaetz and his campaign violated their reporting obligations under FECA by failing to properly disclose the purpose of approximately \$1.2 million in disbursements to Stripe.
6. This complaint is filed pursuant to 52 U.S.C. § 30109(a)(1) and is based on information and belief that Matt Gaetz and Friends of Matt Gaetz have violated and continue to violate FECA, 52 U.S.C. § 30101, *et seq.* “If the Commission, upon receiving a complaint . . . has reason to believe that a person has committed, or is about to commit, a violation of [FECA] . . . [t]he Commission *shall make an investigation* of such alleged violation.”¹

FACTS

7. Matt Gaetz was until recently the U.S. Representative for Florida’s First Congressional District.² His principal campaign committee in 2024 was Friends of Matt Gaetz; Steven G. Martin served as the committee’s treasurer.³ Gaetz won re-election in the 2024 general election,⁴ but announced his resignation from Congress on November 13, 2024, upon being named as President-elect Donald Trump’s nominee for U.S. Attorney General.⁵

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

² Office of the First Congressional District of Florida, <https://clerk.house.gov/members/FL01/vacancy> (last visited Nov. 18, 2024).

³ Friends of Matt Gaetz, Amend. Statement of Org. at 1 (Nov. 1, 2023), <https://docquery.fec.gov/pdf/193/202311019598920193/202311019598920193.pdf>.

⁴ Matt Gaetz, Amend. Statement of Candidacy at 1 (May 10, 2023), <https://docquery.fec.gov/pdf/651/202305109581429651/202305109581429651.pdf>; Mike Lillis, *Gaetz Sails to Fifth Term in Florida*, The Hill (Nov. 5, 2024), <https://thehill.com/homenews/campaign/4972861-matt-gaetz-florida-house/>.

⁵ Maya C. Miller, *Matt Gaetz Resigns From Congress After Trump Picks Him for Attorney General*, N.Y. Times (Nov. 13, 2024), <https://www.nytimes.com/2024/11/13/us/politics/matt-gaetz-resign-congress-trump.html>.

8. Gaetz’s campaign has reported paying Stripe \$1,217,697.79 during the 2024 election cycle,⁶ describing each expenditure as “e-merchant fees.”⁷
9. Stripe is a payment processing platform that many campaigns and committees use to process online contributions.⁸ Stripe runs “the backend” of contribution webpages.⁹ It processes contributors’ gifts, stores credit card information, and routes incoming funds to the recipient committee’s account.¹⁰ In exchange for these services, Stripe charges customers 30 cents per contribution plus 2.9% of each contribution.¹¹
10. Based on the data that has been processed by the Commission, the Gaetz campaign has reported raising \$2,831,039.95 in itemized contributions from 49,473 individual contributions this cycle, along with an unitemized contribution total of \$3,448,125.36, and it has paid Stripe \$1,217,697.79.¹² Assuming both that the Gaetz campaign paid Stripe’s standard payment processing rate and did not get any sort of special discount

⁶ Disbursements to “stripe” by Friends of Matt Gaetz, 2023-24, https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00612432&recipient_name=stripe&two_year_transaction_period=2024 (last visited Nov. 18, 2024). Some of the Gaetz campaign’s contributions and expenditures remain “raw” data. Only “processed” data appears at this link. The Commission has processed data only through the 2024 October Quarterly filing deadline, which ended in September 2024. A manual review of the Gaetz campaign’s subsequently filed FEC report reveals that the campaign’s cycle-to-date total of Stripe expenditures is \$1,225,773.24. *See* Friends of Matt Gaetz, 2024 Pre-General Report (Oct. 24, 2024), <https://docquery.fec.gov/pdf/200/202410249710639200/202410249710639200.pdf> (showing an additional \$8,075.45 in payments to Stripe). Because this complaint relies on data comparisons and certain data points that can only be pulled from “processed” data, the complaint uses the “processed” figure in the discussion.

⁷ Stripe has credited the Gaetz campaign over \$100,000. *See* Disbursements to “stripe” by Friends of Matt Gaetz, *supra* note 6. The purpose of those credits is not immediately clear. The Gaetz campaign labeled them “credit e-merchant fees” and “credit: transfer of Stripe reserved funds.” *See id.*

⁸ *See* Stripe, <https://stripe.com/> (last visited Nov. 18, 2024); Ryan Mac, *The Early Winner of the Presidential Election? Stripe*, *Forbes* (July 22, 2015), <https://www.forbes.com/sites/ryanmac/2015/07/22/presidential-election-donations-stripe-hillary-clinton-rand-paul/>.

⁹ Mac, *supra* note 8.

¹⁰ *Id.*

¹¹ *Pricing Built for Businesses of All Sizes*, Stripe, <https://stripe.com/pricing> (last visited Nov. 18, 2024). Some committees might receive volume or multi-product discounts. *See id.*

¹² Individual Contributions for Friends of Matt Gaetz, 2023-24, https://www.fec.gov/data/receipts/individual-contributions/?committee_id=C00612432&two_year_transaction_period=2024&min_date=01%2F01%2F2023&max_date=12%2F31%2F2024 (last visited Nov. 19, 2024); Friends of Matt Gaetz, Financial Summary, 2023-24, <https://www.fec.gov/data/committee/C00612432/?tab=summary> (last visited Nov. 18, 2024); Disbursements to “stripe” by Friends of Matt Gaetz, *supra* note 6.

(which would present a different problem under FECA, namely the receipt of unreported and excessive in-kind contributions), and that Stripe processed every contribution the campaign received, the campaign would have owed Stripe \$96,942.06 in fees for the processing of itemized contributions,¹³ which is roughly \$1.1 million less than the \$1.2 million it claims to have paid—a difference that cannot reasonably be explained by the processing of unitemized contributions.

11. Although political committees are not required to report the specific number or amount of unitemized contributions received (both of which would factor into Stripe’s fee formula), the vast additional sum of roughly \$1.1 million that Gaetz’s campaign reported paying Stripe cannot reasonably be explained by the campaign’s unitemized contributors: The 2024 Democratic and Republican presidential campaigns, and both parties’ national committees, have each reported raising vastly more in unitemized contributions, yet have paid Stripe *less than half* of what Gaetz’s campaign reported paying the company.¹⁴ And while Gaetz’s campaign could, in theory, be processing other charges—*e.g.*, merchandise sales—through Stripe, these transactions would be reportable as contributions and already accounted for in the itemized or unitemized contribution totals.
12. As such, it appears that Gaetz’s campaign reported paying Stripe significantly more than it likely owed the company per its standard fee for processing contributions, which raises

¹³ Where processing fees = (total value of individual contributions * .029) + (total number of individual contributions * .3).

¹⁴ In the 2024 cycle, Harris Victory Fund has reported \$301,107,072.50 in unitemized individual contributions, and the Republican National Committee has reported \$90,025,165.95 in unitemized individual contributions. Friends of Matt Gaetz has reported more than twice as much spending on Stripe e-merchant fees than Harris Victory Fund, and more than four times as much than the Republican National Committee, despite raising just \$3,448,125.36 in unitemized contributions. *See* Harris Victory Fund Financial Summary, 2023-24, <https://www.fec.gov/data/committee/C00744946/> (last visited Nov. 18, 2024); Republican National Comm. Financial Summary, <https://www.fec.gov/data/committee/C00003418/> (last visited Nov. 18, 2024).

serious questions about whether the campaign misreported the true recipient or purpose of the vast majority of its expenditures to Stripe.

13. Comparing the Gaetz campaign’s Stripe payments to other political committees’ payments this cycle further demonstrates the sheer implausibility of the reported sum. The Gaetz campaign has paid Stripe more than any other federal committee has paid Stripe by a wide margin. Looking only at processed FEC disclosure data, the Gaetz campaign has paid Stripe *more than double* the next highest payor, the Harris Victory Fund—a joint fundraising committee whose participants include Vice President Kamala Harris’s 2024 presidential campaign, the Democratic National Committee, and numerous state party committees—which has raised nearly \$1.2 *billion* this cycle.¹⁵ The Gaetz campaign’s payments to Stripe also vastly outpace the amount the Republican National Committee and Democratic National Committee—top fundraisers in the 2024 election cycle—paid to Stripe. Indeed, Gaetz’s campaign has reported paying Stripe more than the *combined* amount paid to the company by the next four highest spenders.
14. The table below displays how much the ten committees that have paid the most to Stripe disbursed to the platform during the 2024 election cycle.¹⁶

¹⁵ Harris Victory Fund Financial Summary, *supra* note 14; *see also* Harris Victory Fund, Amend. Statement of Org. at (Jul. 21, 2024), <https://docquery.fec.gov/pdf/305/202407219665705305/202407219665705305.pdf>.

¹⁶ *See* Disbursements to “stripe”, 2023-34, https://www.fec.gov/data/disbursements/?data_type=processed&recipient_name=stripe&two_year_transaction_period=2024&min_date=01%2F01%2F2023&max_date=12%2F31%2F2024 (last visited Nov. 18, 2024).

POLITICAL COMMITTEE	2024 ELECTION CYCLE DISBURSEMENTS TO STRIPE
Friends of Matt Gaetz	\$1,217,697.79
Harris Victory Fund	\$476,432.42
Republican National Committee	\$262,585.34
Kentucky State Democratic Central Executive Committee	\$190,000.00
DNC Services Corp / Democratic National Committee	\$166,842.64
Senate Conservatives Fund	\$137,433.70
Senate Leadership Fund	\$122,500.00
The PAC For America's Future	\$101,884.68
Americans For Prosperity Action, Inc. (AFP ACTION) DBA CVA Action and DBA Libre Action	\$96,717.00
The Council of Insurance Agents & Brokers Political Action Committee	\$80,996.00

15. In sum, the Gaetz campaign has paid Stripe significantly more than any other federal committee has paid the company, and based on the published rate Stripe charges for its payment processing services, Gaetz's campaign could not have owed Stripe anywhere close to the \$1.2 million it paid in "e-merchant fees."
16. The Gaetz campaign reportedly spent \$6.2 million this election cycle.¹⁷ If the apparently excessive \$1.1 million that the campaign reported paying Stripe was actually to another vendor and/or for purposes other than the reported e-merchant fees, that would mean that roughly one out of every six dollars the Gaetz campaign spent during the 2024 election remains effectively unaccounted for and concealed from public view.
17. Moreover, it appears that Gaetz's campaign has been misreporting payments to Stripe for years, compounding the severity of the violation. Since 2018, the campaign has paid

¹⁷ Friends of Matt Gaetz Financial Summary, *supra* note 12.

Stripe \$2,466,376.08. The pattern of payments makes little sense, as the campaign’s payments to Stripe do not track its fundraising, as shown in the table below.¹⁸

CYCLE	TOTAL ITEMIZED INDIVIDUAL CONTRIBUTIONS	TOTAL UNITEMIZED INDIVIDUAL CONTRIBUTIONS	TOTAL INDIVIDUAL CONTRIBUTIONS	AMOUNT DISBURSED TO STRIPE
2017-2018	\$770,729.38	\$236,516.79	\$1,007,246.17	\$575.17
2019-2020	\$2,114,598.31	\$3,870,740.45	\$5,985,338.76	\$350,309.48
2021-2022	\$2,581,943.56	\$3,973,658.76	\$6,555,602.32	\$897,793.64
2023-2024	\$2,831,039.95	\$3,448,125.36	\$6,279,165.31	\$1,217,697.79
TOTAL	\$8,298,311.20	\$11,529,041.36	\$19,827,352.56	\$2,466,376.08

18. For example, even though the total amount of contributions to Gaetz’s campaign—*i.e.*, the overall amount that could possibly be subject to a Stripe fee—only increased by 9.5% between the 2020 and 2022 cycles, the committee reported spending 156% more with Stripe on “e-merchant” fees in the 2022 cycle. In the 2024 cycle, the committee has reported spending about 36% more with Stripe compared to the 2022 cycle—even though the relevant contribution figure actually *decreased*.
19. The payments that the Gaetz campaign has reported simply do not correlate with the committee’s potential financial obligations to Stripe—again, based on Stripe’s fee structure and assuming Stripe was the only payment processor used—which strongly

¹⁸ *Supra* note 12. See also Friends of Matt Gaetz, Financial Summary for 2017-18, <https://www.fec.gov/data/committee/C00612432/?cycle=2018> (last visited Nov. 19, 2024); Friends of Matt Gaetz, Financial Summary for 2019-20, <https://www.fec.gov/data/committee/C00612432/?cycle=2020> (last visited Nov. 19, 2024); Friends of Matt Gaetz, Financial Summary for 2021-22, <https://www.fec.gov/data/committee/C00612432/?cycle=2022> (last visited Nov. 19, 2024); Disbursements to “stripe” by Friends of Matt Gaetz, Jan. 1, 2017 – Dec. 31, 2022, https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00612432&recipient_name=stripe&min_date=01%2F01%2F2017&max_date=12%2F31%2F2022 (last visited Nov. 19, 2024). Amounts in this chart are sourced from the Committee’s financial summary pages, with the exception of 2023-24 total itemized individual contributions, which was computed using the Commission’s Individual Contributions database and added to the unitemized total listed on the Committee’s financial summary page for the cycle to reach a total for 2023-24. This approach provides the most accurate total while the Commission continues to process data from the 2023-24 election cycle.

indicates that the Gaetz campaign has been filing materially false disclosure reports for years, culminating in the massive and unsupportable reported payment this cycle of over \$1.2 million.

SUMMARY OF THE LAW

20. FECA requires each treasurer of a political committee to file regular reports of receipts and disbursements with the Commission.¹⁹ Each report must provide, *inter alia*, itemized information regarding the name and address of each person to whom the committee makes an expenditure or other disbursement aggregating more than \$200 per election cycle, as well as the date, amount, and purpose of such payments.²⁰ The purpose statement must include a brief “description of why the disbursement was made.”²¹ A person reading a disclosure report should be able to “easily discern why the disbursement was made by reading the name of the recipient and the purpose.”²²
21. A committee’s failure to properly itemize its disbursements, including recipient and purpose information, leaves voters in the dark about the entities working for the committee and the nature of the services—which denies voters their informational interest in knowing “where political campaign money comes from and how it is spent,”²³ and undermines the bedrock transparency necessary for voters to meaningfully evaluate candidates and “make informed decisions.”²⁴

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

²⁰ 52 U.S.C. § 30104(b)(5)–(6); 11 C.F.R. §§ 104.3(b)(4)(i), (vi), 104.9(a)–(b).

²¹ 11 C.F.R. § 104.3(b)(3)(i).

²² *Purposes of Disbursement*, FEC, <https://www.fec.gov/help-candidates-and-committees/purposes-disbursements/> (last visited Nov. 18, 2024); *see also* Statement of Policy: “Purpose of Disbursement” Entries for Filings with the Commission, 72 Fed. Reg. 887, 887 (Jan. 9, 2007), https://www.fec.gov/resources/cms-content/documents/policy-guidance/fedreg_notice_2006-23_EO13892.pdf.

²³ *Buckley v. Valeo*, 424 U.S. 1, 66 (1976).

²⁴ *Citizens United v. FEC*, 558 U.S. 310, 370 (2010).

22. The Commission has conciliated violations when committees failed to provide complete and accurate descriptions of their expenditures. For example, in MURs 7291 and 7449, the FEC conciliated a \$105,000 civil penalty when a party committee paid a law firm for opposition research but labeled the payments as “legal and compliance consulting.”²⁵ In MUR 7293, likewise, a campaign used generic “consulting” labels to describe payments for items like “lodging” and “food & beverage,” resulting in a \$125,000 penalty.²⁶ These six-figure penalties are commensurate with the substantial harm inflicted on the public when a committee obscures the purpose of its expenditures.²⁷

CAUSE OF ACTION

COUNT I:

FORMER CONGRESSMAN MATT GAETZ AND HIS CAMPAIGN COMMITTEE VIOLATED 52 U.S.C. § 30104 BY MISREPORTING PAYMENTS TO STRIPE

23. The available information indicates that former Congressman Matt Gaetz and his campaign committee violated FECA by failing to properly report payments purportedly made to Stripe for processing online contributions.

²⁵ Conciliation Agreement, MURs 7291 and 7449 (DNC Servs. Corp./DNC) (Feb. 22, 2022), https://www.fec.gov/files/legal/murs/7291/7291_53.pdf.

²⁶ Conciliation Agreement, MUR 7293 (Friends of David Schweikert) (Jan. 12, 2021), https://www.fec.gov/files/legal/murs/7923/7923_27.pdf.

²⁷ Efforts to conceal the actual *recipients* of campaign spending have resulted in even more severe consequences, including criminal charges. When former Congressman George Santos’s campaign committee reported a series of \$199.99 disbursements for goods and services that clearly cost far more than that amount, it turned out he had fabricated those transactions to hide his personal use of campaign funds; he eventually pled guilty to numerous felony charges including defrauding donors. *CLC Files Complaint Alleging Rep. George Santos Violated Federal Campaign Finance Laws*, CLC, <https://campaignlegal.org/document/clc-files-complaint-alleging-rep-george-santos-violated-federal-campaign-finance-laws> (Jan. 9, 2023); Press Release, Former Congressman George Santos Pleads Guilty to Wire Fraud and Aggravated Identity Theft, Dep’t of Justice, <https://www.justice.gov/usao-edny/pr/former-congressman-george-santos-pleads-guilty-wire-fraud-and-aggravated-identity> (Aug. 19, 2024). Similarly, in 2016, three aides to 2012 presidential candidate Ron Paul were convicted of falsifying FEC reports to hide payments that induced an influential Iowa state senator to endorse Paul for president during the 2012 Iowa Caucuses. Tal Kopan, *Former Ron Paul Aide, Trump Super PAC Chief Convicted in Campaign Finance Trial*, CNN (May 5, 2016), <https://www.cnn.com/2016/05/05/politics/jesse-benton-rand-ron-paul-aide-convicted-trump-super-pac/index.html>.

24. The Gaetz campaign reported paying Stripe about \$1.2 million in “e-merchant fees,”²⁸ which is implausible for multiple reasons.
25. First, based on Stripe’s payment structure, Gaetz’s campaign could have owed Stripe no more than \$97,000 for the processing of its itemized contributions:²⁹ Since Stripe charges customers 30 cents per contribution plus 2.9% of each contribution,³⁰ and Gaetz’s campaign reportedly raised \$2,831,039.95 from 49,473 individual contributions, the campaign therefore should have paid Stripe \$96,942.06 in fees. Instead, Gaetz’s campaign reported paying Stripe \$1,217,697.79.³¹ The additional amount paid in fees to Stripe cannot rationally be explained by the amount that Gaetz’s campaign received in unitemized contributions, as that would require an absurdly large number of individual contributors providing very small contributions, in a manner unique from how contributors donate to other committees paying fees to Stripe.
26. Second, Gaetz’s campaign paid Stripe vastly more than any other federal political committee paid the company this election cycle, including committees that raised astronomically more money, from far more itemized individual donors, than Gaetz’s campaign.³² Gaetz’s campaign, for example, paid more than double what the Harris Victory Fund (which raised over \$1 billion during the 2024 election cycle) paid to Stripe and more than quadruple the next highest spenders.³³ The Gaetz campaign is in a league of its own when it comes to Stripe payments, and there is no plausible explanation for those payments, based on Stripe’s payment formula. Put simply, Gaetz’s campaign could

²⁸ See Disbursements to “stripe” by Friends of Matt Gaetz, *supra* note 6.

²⁹ See *supra* ¶ 10.

³⁰ *Pricing Built for Businesses of All Sizes*, Stripe, *supra* note 11.

³¹ *Supra* note 6.

³² See Table at *supra* ¶ 14.

³³ See *id.*

not have owed more in e-merchant fees than any other federal political committee in 2024, given its relative size and fundraising numbers.

27. Third, Gaetz’s campaign has been reporting inconsistent and inexplicably high disbursements to Stripe for six years. The campaign has paid Stripe more money when it has raised less from donors, and it has reported spending wildly different amounts across years when its fundraising remained relatively consistent.³⁴ Given these trends, it appears that Gaetz’s campaign was not paying “e-merchant fees” for processed contributions, as it represented on its reports. At a minimum, assuming that the campaign correctly reported Stripe as the recipient of this spending—*i.e.*, that Stripe actually received the \$1.2 million in fees that Gaetz’s campaign reported disbursing to it—the description of “e-merchant fees” that the campaign provided for these transactions is inaccurate because it fails to appropriately account for the actual services that Stripe provided to Gaetz’s campaign.
28. These factual circumstances support finding reason to believe the Gaetz campaign has violated its reporting obligations under FECA: there appears to be a glaring error in the Gaetz campaign’s reports, either with respect to the purpose for these payments—*i.e.*, that the campaign has concealed that it paid Stripe for a vast array of other services aside from payment processing—or the actual recipient.
29. In either case, Gaetz and his campaign have not properly accounted for about \$1.1 million in disbursements, a significant amount of money that represents a sixth of the campaign’s total spending.³⁵

³⁴ *See id.*

³⁵ Friends of Matt Gaetz Financial Summary, *supra* note 12.

30. The FEC must investigate how the Gaetz campaign *actually* spent its campaign funds, because voters have a right to know how candidates and campaigns spend their money, and the FEC is entitled to the information it needs to ensure that campaigns are abiding by all relevant laws, such as the personal use restriction. Indeed, multiple recent FEC matters have involved the misreporting of disbursements to obfuscate the personal use of campaign funds.³⁶
31. The Gaetz campaign's reports are implausible on their face, indicating at the very least that the reported purposes of the campaign's payments to Stripe are incorrect.
32. Accordingly, based on the information herein, there is reason to believe that Gaetz and Friends of Matt Gaetz violated their reporting obligations under 52 U.S.C. § 30104.

³⁶ See, e.g., *CLC Alleges Royce White Violated Personal Use Prohibition and Reporting Requirements*, CLC (Jun. 6, 2024), <https://campaignlegal.org/document/clc-alleges-royce-white-violated-personal-use-prohibition-and-reporting-requirements>.

PRAYER FOR RELIEF

33. Wherefore, the Commission should find reason to believe that Matt Gaetz and Friends of Gaetz violated 52 U.S.C. § 30101 *et seq.*, and conduct an immediate investigation under 52 U.S.C. § 30109(a)(2).
34. 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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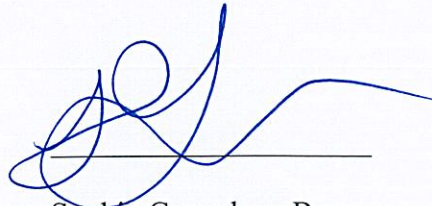
November 19, 2024

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



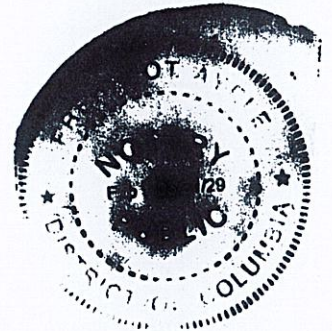
Sophia Gonsalves-Brown

Sworn to and subscribed before me this 19 day of November 2024.



Notary Public

FREHIWOT AYELE
District of Columbia Notary Public
My Commission Expires May 31, 2029



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 19 day of November 2024.



Notary Public

