

BEFORE THE FEDERAL ELECTION COMMISSION

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

v. MUR No. _____

PROMOTING AMERICAN VALUES
FOR EVERYONE, INC.
501 Silverside Road, Ste. 534
Wilmington, DE 19809

OAKLAND CORPS PAC and
DMITRI MEHLHORN in his official
capacity as treasurer
501 Silverside Road, Ste. 534
Wilmington, DE 19809

ANY UNKNOWN PERSON(S)
who made a contribution to Oakland Corps
PAC in the name of Promoting American
Values for Everyone, Inc.

COMPLAINT

1. During the final weeks before the 2024 election, one or more unknown individual(s) appear to have used Promoting American Values for Everyone, Inc. (“PAVE”), a Delaware corporation formed on September 4, 2024, as a “straw donor” — an intermediary person or entity used to funnel contributions to conceal the identity of the true contributor(s) — to make two contributions totaling \$625,000 to a super PAC, Oakland Corps PAC (“OC PAC”). OC PAC, which was organized on October 17, 2024 — the day before it received the first contribution made in PAVE’s name — shares a mailing address with PAVE and received all of its funding from the corporation; PAVE was its *only* source of funding. Overall, these facts indicate that the super PAC and the apparent straw donor were organized by the same unknown person(s) for the purpose of

unlawfully concealing the true source of \$625,000 in contributions, which were used to make over \$390,000 in independent expenditures.

2. There is no publicly available information indicating that PAVE conducted any business or other activity between its formation and the hundreds of thousands of dollars in contributions made in its name from which it could have generated sufficient funds to make those contributions without someone (*i.e.*, the true contributor) transferring funds to PAVE for that purpose. As such, there is reason to believe PAVE 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 to contribute \$625,000 while concealing the true contributor(s)’s identity.
3. This complaint is filed pursuant to 52 U.S.C. § 30109(a)(1) and is based on information and belief that PAVE, OC PAC, and any person(s) that created, operated, or made contributions in the name of PAVE, violated the Federal Election Campaign Act (“FECA” or the “Act”), 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

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

FACTUAL BACKGROUND

4. PAVE was organized in Delaware as an exempt corporation on September 4, 2024.² Its registered agent is Resident Agents Inc.,³ and Adam Clark signed its Certificate of Incorporation filed with the State of Delaware as its “incorporator.”⁴
5. PAVE appears to have little to no discernible public footprint:
 - a. Searches on Google provide no results that originate from “Promoting American Values for Everyone, Inc.” itself or that detail any activity by “Promoting American Values for Everyone, Inc.” The only relevant results relate solely to the contributions at issue in this complaint.
 - b. “Promoting American Values for Everyone, Inc.” does not appear to have any account or page on Facebook, Instagram, or X (formerly known as Twitter).
 - c. There is no record of “Promoting American Values for Everyone, Inc.” in searches with the Better Business Bureau,⁵ Bloomberg,⁶ EDGAR,⁷ or the Delaware State Chamber of Commerce.⁸
6. On October 17, 2024, OC PAC organized as an independent-expenditure only political committee (*i.e.*, a “super PAC”) and Dmitri Mehlhorn is its treasurer.⁹

² “Promoting American Values for Everyone, Inc.,” Entity Details, DE Dep’t of State: Div. of Corps. (last visited Jan. 29, 2025) (attached as Exhibit A).

³ *Id.*

⁴ “Promoting American Values for Everyone, Inc.,” Certificate of Incorporation, DE Dep’t of State: Div. of Corps. (Sep. 4, 2024) (attached as Exhibit B).

⁵ See Better Business Bureau, <https://www.bbb.org/search/> (last visited Jan. 29, 2025).

⁶ See Bloomberg, Company Search, <https://www.bloomberg.com/> (last visited Jan. 29, 2025).

⁷ See U.S. Securities and Exchange Commission, EDGAR, <https://www.sec.gov/edgar/search/> (last visited Jan. 29, 2025).

⁸ See Delaware State Chamber of Commerce, Member Directory, <https://web.dscc.com/atlas/directory/search> (last visited Jan. 29, 2024).

⁹ OC PAC, Statement of Org. at 1 (Oct. 17, 2024), <https://docquery.fec.gov/pdf/006/202410179698588006/202410179698588006.pdf> (“OC PAC Statement of Org.”).

7. OC PAC reported receiving a contribution of \$125,000 from PAVE on October 18, 2024, the day after it registered, and a second contribution of \$500,000 from PAVE on October 30, 2024, for a total of \$625,000.¹⁰ OC PAC reported no receipts from any other source. PAVE’s address in connection with both of the purported contributions is listed as 501 Silverside Road, Ste 534, Wilmington DE 19809, the same address that OC PAC listed on its Statement of Organization.¹¹
8. OC PAC reported making \$393,906.10 in independent expenditures, all of which were made between October 21, 2024 (*i.e.*, three days after PAVE’s first purported contribution) and November 19, 2024.¹²

SUMMARY OF THE LAW

9. 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.”¹³
10. 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

¹⁰ OC PAC, FEC Form 3X, 2024 Post-General Report at 6 (Dec. 5, 2024), <https://docquery.fec.gov/pdf/460/202412059720998460/202412059720998460.pdf> (“OC PAC Post-General Report”).

¹¹ *Id.*; OC PAC Statement of Org., *supra* note 9.

¹² Independent Expenditures by OC PAC (C00891325), Regularly Scheduled Reports, Jan. 1, 2023 – Dec. 31, 2024, FEC, https://www.fec.gov/data/independent-expenditures/?data_type=processed&q_spender=C00891325&is_notice=false&most_recent=true&min_date=01%2F01%2F2023&max_date=12%2F31%2F2024 (last visited Jan. 29, 2025) (“OC PAC IEs”).

¹³ 52 U.S.C. § 30122.

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.”¹⁴

11. 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,¹⁵ and ensures that the public is fully informed about the true sources of political contributions and expenditures. Such transparency also enables voters, including complainant Gonsalves-Brown, to have the information necessary to evaluate candidates for office, “make informed decisions[,] and give proper weight to different speakers and messages.”¹⁶
12. 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.¹⁷ Moreover, the “key issue . . . is the source of the funds” and, therefore, the legal status of the funds

¹⁴ 11 C.F.R. § 110.4(b)(2)(i)–(ii).

¹⁵ *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).

¹⁶ *Citizens United v. FEC*, 558 U.S. 310, 369–71 (2010).

¹⁷ 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.”).

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].”¹⁸

13. 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.¹⁹ 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 the individual, not the corporation or corporate LLC, the true source of the funds.”²⁰ 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.²¹

14. 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

¹⁸ *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).

¹⁹ 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 (W Spann LLC, *et al.*) (Apr. 1, 2016), <https://www.fec.gov/files/legal/murs/6487/16044391129.pdf>.

²⁰ *Id.*

²¹ *Id.* at 12.

rules” — apply when LLCs purport to make contributions to independent-expenditure only political committees (“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.²²

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.

15. 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.”²³ The Commission subsequently entered into a conciliation agreement with Tomfoolery LLC and Chavez, which included a \$25,000 civil penalty.²⁴

²² 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 (Blue Magnolia Investments, LLC) (Apr. 15, 2022) (emphases added), https://www.fec.gov/files/legal/murs/7454/7454_36.pdf.

²³ Factual and Legal Analysis at 7, MUR 7903 (Tomfoolery LLC, *et al.*) (Aug. 1, 2022), https://www.fec.gov/files/legal/murs/7903/7903_13.pdf (“Tomfoolery F&LA”).

²⁴ See Conciliation Agreement ¶ VI, MUR 7903 (Tomfoolery LLC, *et al.*) (Oct. 3, 2022), https://www.fec.gov/files/legal/murs/7903/7903_16.pdf.

16. Straw donor contributions like those alleged here are serious violations of federal campaign finance law that have led to criminal indictments and convictions.²⁵ 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.²⁶ Another indictment highlighted how straw donor schemes have been used to skirt FECA's source prohibitions, such as the ban on contributions by government contractors.²⁷
17. 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.

²⁵ 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>.

²⁶ 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>.

²⁷ 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>.

CAUSE OF ACTION

COUNT I:

PROMOTING AMERICAN VALUES FOR EVERYONE, INC., OAKLAND CORPS PAC, AND THE UNKNOWN PERSON(S) WHO CONTRIBUTED TO OAKLAND CORPS PAC IN THE NAME OF PROMOTING AMERICAN VALUES FOR EVERYONE, INC. VIOLATED 52 U.S.C. § 30122

18. The available information indicates that PAVE did not have the means to contribute \$625,000 without one or more other persons providing funds to PAVE for that purpose, such that these unknown other persons were, in fact, the true source(s) of the two contributions to OC PAC made in PAVE's name.
19. PAVE was registered as a Delaware exempt corporation on September 4, 2024.²⁸ About six weeks after its formation, on October 17, 2024, OC PAC registered as an IEOPC with the Commission, listing the same address that was reported as PAVE's address on OC PAC's disclosure reports with respect to the contributions at issue in this complaint.²⁹ The following day, October 18, 2024, PAVE purported to make a \$125,000 contribution — followed by a \$500,000 contribution twelve days later.³⁰ As such, PAVE purported to contribute \$625,000 to OC PAC within the first two weeks after the super PAC was formed, despite having engaged in no commercial or other activity from which PAVE could have generated sufficient funds to make these contributions in its own name.³¹
20. During the six-week period between its formation and the \$625,000 in contributions made in its name, PAVE does not appear to have engaged in any activity from which it could have garnered sufficient funds to make the contributions at issue — absent being provided such funds by one or more other persons, the true contributor(s). Indeed, PAVE

²⁸ See Ex. A.

²⁹ See OC PAC Statement of Org., *supra* note 9; OC PAC Post-General Report, *supra* note 10, at 6.

³⁰ OC PAC Post-General Report, *supra* note 10, at 6.

³¹ See *supra* ¶ 5.

appears to exist primarily on paper. It maintains no online presence or storefront, and there is no news article or public record that provides any information about its activities beyond the contributions at issue.³²

21. As such, PAVE appears to have engaged in no activity between the date of its formation and the date of the \$625,000 in contributions made in its name. It is utterly implausible that a nascent, six-week-old entity with no income-generating activity could have acquired sufficient funds to enable it to make a \$625,000 contribution in its own name, with its own funds. Thus, PAVE appears to have “lacked the financial wherewithal to make the [\$625,000 in] contribution[s] to [OC PAC] on its own.”³³
22. The use of a straw donor, such as the opaque and obscure Delaware corporation at issue, to effectively act as a clearinghouse for the contribution(s) of other person(s) — 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.
23. Accordingly, based on the foregoing, there is reason to believe that the unidentified person(s) who contributed \$625,000 to OC PAC in the name of PAVE violated 52 U.S.C. § 30122 by making contributions in the name of another, and that PAVE violated 52 U.S.C. § 30122 by knowingly permitting its name to be used to effect the contributions of one or more other persons in its own name.

³² *See id.*

³³ Tomfoolery F&LA at 5.

24. Furthermore, the available information supports finding reason to believe that OC PAC violated 52 U.S.C. § 30122 by knowingly accepting \$625,000 in contributions in the name of another.
25. OC PAC was organized on October 17, 2024, about six weeks after PAVE’s formation on September 4, 2024, and the two entities appear to have shared the same address.³⁴ Moreover, OC PAC received *all* of its funds — \$625,000 — from PAVE; it received no money from any other source.³⁵ It is utterly implausible that this newly formed super PAC somehow did not know the real identity of the true contributor(s) providing 100% of its funding, which it immediately used to make independent expenditures in the days surrounding the 2024 election.³⁶
26. In light of the short timeframe between the formation of PAVE and OC PAC, the two entities’ shared address, and the fact that OC PAC received all of its funding from PAVE, the overall record supports finding reason to believe that OC PAC knew PAVE was not the true source of the contributions made in its name, *i.e.*, that OC PAC violated 52 U.S.C. § 30122 by knowingly accepting contributions in the name of another.

* * *

27. Finally, the facts of this matter support finding reason to believe the aforementioned violations of FECA were knowing and willful.
28. 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.”³⁷ This standard does not require proving knowledge of the specific statute or

³⁴ See Ex. A; OC PAC Statement of Org., *supra* note 9; OC PAC Post-General Report, *supra* note 10, at 6.

³⁵ See *supra* ¶ 7.

³⁶ See OC PAC IEs, *supra* note 12.

³⁷ 122 Cong. Rec H3778 (daily ed. May 3, 1976).

regulation a person violated.³⁸ Rather, it is sufficient to demonstrate that a respondent “acted voluntarily and was aware that his conduct was unlawful.”³⁹ This awareness may be shown through circumstantial evidence, such as a person’s efforts to disguise their actions.⁴⁰

29. In the context of straw donor violations, at least one federal court has emphasized that the knowing-and-willful standard is not meant to be exceedingly difficult; it is simply geared at drawing a line between “law-abiding citizens who might inadvertently violate the law” and those engaging in “wrongful conduct.”⁴¹ Particularly when evidence indicates that a recipient knew the true source of the contribution when it accepted and misreported the conduit as the source, there is little “risk that criminal penalties will be imposed on the basis of innocent conduct.”⁴²
30. Here, the factual record strongly suggests that PAVE, OC PAC, and those who anonymously funded PAVE acted intentionally to violate FECA’s disclosure laws and obscure their unlawful activities from public detection.
31. All of the events at issue in this complaint took place within roughly eight weeks: within that relatively short time span, PAVE was formed on September 4, 2024, OC PAC registered with the Commission on October 17, 2024, and unknown persons funneled \$625,000 to PAVE.⁴³ That allowed the corporation, which appears to have conducted no activity to generate or raise its own funds,⁴⁴ to contribute \$625,000 in its own name to

³⁸ See *United States v. Danielczyk*, 917 F. Supp. 2d 573, 579 (E.D. Va. 2013).

³⁹ *Id.*

⁴⁰ *United States v. Hopkins*, 916 F.2d 207, 213–15 (5th Cir. 1990).

⁴¹ *Danielczyk*, 917 F. Supp. 2d at 579–80 (internal quotation marks omitted).

⁴² *Id.*

⁴³ Ex. A; OC PAC Statement of Org., *supra* note 9.

⁴⁴ See *supra* ¶ 5.

OC PAC beginning on October 18, 2024, the day after OC PAC was organized.⁴⁵ OC PAC then immediately began running independent expenditures, beginning on October 21, 2024, and running through the 2024 election.⁴⁶ The temporal proximity and highly coordinated nature of these events strongly indicates that those funding and operating PAVE and OC PAC planned their activities for the precise purpose of allowing unknown contributor(s) to influence federal elections without their identities becoming public.

32. Two additional details solidify that those behind the scheme were engaging in “wrongful conduct” and did not mistakenly violate the law:⁴⁷ PAVE and OC PAC have the same address — down to the suite number — and PAVE was OC PAC’s *only* contributor.⁴⁸ It is utterly implausible that a political committee would rely on a single source of funding without knowing who was providing the money. Particularly when the money purports to come from an entity housed in the same building as the committee, and the committee begins spending the money on independent expenditures *within days of receiving it*, there is reason to believe there was a prearranged plan between the committee, the true contributor(s), and the straw donor to evade public disclosure of the true contributor(s)’s identity.⁴⁹
33. Given these circumstances, there is reason to believe OC PAC knew that the true source of the funds it received was not PAVE, yet the super PAC failed to disclose the true source(s) of the funds, providing further evidence of knowing and willful intent.⁵⁰

⁴⁵ See OC PAC Post-General Report, *supra* note 10, at 6.

⁴⁶ See OC PAC IEs, *supra* note 12.

⁴⁷ See *Danielczyk*, 917 F. Supp. 2d at 579.

⁴⁸ See *supra* ¶ 7.

⁴⁹ See *supra* ¶¶ 7–8.

⁵⁰ See *Danielczyk*, 917 F. Supp. 2d at 579.

34. Because the totality of the facts indicates that PAVE, OC PAC, and those who contributed to OC PAC in the name of PAVE acted “with full knowledge of all the relevant facts and a recognition that [their actions were] prohibited by law,”⁵¹ the Commission should find reason to believe their violations of 52 U.S.C. § 30122 were knowing and willful.

⁵¹ *Id.*

PRAYER FOR RELIEF

35. Wherefore, the Commission should find reason to believe that PAVE, OC PAC, and any person(s) who made contributions to OC PAC in the name of PAVE, have violated 52 U.S.C. § 30101 *et seq.*, and conduct an immediate investigation under 52 U.S.C. § 30109(a)(2).
36. Further, the Commission should seek appropriate sanctions for any and all violations, including civil penalties sufficient to deter future violations and an injunction prohibiting the respondents from any and all violations in the future, and should seek such additional remedies as are necessary and appropriate to ensure compliance with FECA.

Respectfully submitted,

/s/ Saurav Ghosh
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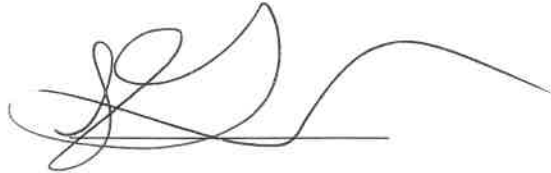
January 30, 2025

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 29 day of January 2025.



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 29 day of January 2025.



Notary Public



EXHIBIT A



Department of State: Division of Corporations

[Allowable Characters](#)

[HOME](#)

Entity Details

THIS IS NOT A STATEMENT OF GOOD STANDING

File Number:	4951015	Incorporation Date / Formation Date:	9/4/2024 (mm/dd/yyyy)
Entity Name:	PROMOTING AMERICAN VALUES FOR EVERYONE, INC.		
Entity Kind:	Corporation	Entity Type:	Exempt
Residency:	Domestic	State:	DELAWARE

[REGISTERED AGENT INFORMATION](#)

Name:	RESIDENT AGENTS INC.		
Address:	8 THE GREEN, STE R		
City:	DOVER	County:	Kent
State:	DE	Postal Code:	19901
Phone:			

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

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

EXHIBIT B

STATE OF DELAWARE
CERTIFICATE OF INCORPORATION
A NON-STOCK CORPORATION

The undersigned Incorporator hereby certifies as follows:

1. The name of the Corporation is Promoting American Values for Everyone, Inc.

2. The Registered Office of the corporation in the State of Delaware is located at
8 The Green, Suite R (street),
in the City of Dover, County of Kent
Zip Code 19901. The name of the Registered Agent at such address upon
whom process against this corporation may be served is Resident Agents, Inc.

3. The purpose of the corporation is to engage in any lawful act or activity for which
corporations may be organized under the General Corporation Law of Delaware. (If the
Corporation is to be a nonprofit corporation, please add: "This Corporation shall be a
nonprofit corporation.") The corporation shall be a nonprofit corporation organized for the promotion
social welfare within the meaning of section 501(c)(4) of the Internal Revenue Code, as amended.

4. The corporation shall not have any capital stock.

5. The conditions of membership are The corporation shall not have members.

6. The name and mailing address of the incorporator are as follows:
Name Adam Clark
Mailing Address 1634 I Street, NW, Suite 1250
Washington, DC Zip Code 20006

7. See attachment.

By: 
Incorporator

Name: Adam Clark
Print or Type

7. Upon dissolution, the assets of the Corporation shall be distributed for one or more exempt purposes within the meaning of sections 501(c)(3) or 501(c)(4) of the Internal Revenue Code, or the corresponding section of any future federal tax code, or shall be distributed to a federal, state, or local government for a public purpose. Any assets not disposed of in this manner shall be disposed of by a Court of Competent Jurisdiction in the locality in which the principal office of the Corporation is then located exclusively for such purposes or to such organization or organizations, as said Court shall determine, which are organized and operated exclusively for such purposes.