

**BEFORE THE FEDERAL ELECTION COMMISSION**

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

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

REP. ANDY OGLES  
ANDY OGLES FOR CONGRESS  
and THOMAS DATWYLER in his  
official capacity as treasurer  
29 Public Square  
Columbia, TN 38401

**COMPLAINT**

1. Representative Andy Ogles appears to have deliberately and falsely reported a \$320,000 “personal loan” to his 2022 congressional campaign to bolster his campaign’s apparent financial strength in a competitive primary election—an egregious violation of federal laws that require candidates to accurately disclose the sources and amounts of their campaign funds. Following an extensive investigation, the Office of Congressional Ethics (“OCE”) released a report concluding that Ogles appears to have knowingly and willfully filed false campaign finance reports, citing evidence indicating that Ogles falsified the source and amount of the loan—which was only \$20,000 and may have been from Ogles’s in-laws—and sought to conceal his actions by lying to his campaign treasurer and manager and blocking their access to the campaign’s bank records.
2. In addition, there is reason to believe Ogles’s campaign violated its reporting obligations in many other respects. For example, Ogles’s campaign reported paying over \$14,000 to a vendor whose name and address were improperly reported. The campaign also appears to have erroneously reported receiving office supplies from a vendor that did not provide

any such services. Additionally, the campaign appears to have inaccurately reported the ultimate recipient, address, or purpose for other disbursement transactions, including transactions involving companies that do not appear to exist, raising serious questions about who actually received the campaign's money.

3. Taken together, these wide-ranging reporting violations suggest Ogles's overarching effort to obscure how he raised and spent money in pursuit of federal office, a flagrant violation of the transparency mandated by the Federal Election Campaign Act ("FECA" or "the Act").<sup>1</sup> Particularly in light of the apparent, imminent ending of a criminal investigation of Ogles and his campaign<sup>2</sup>—which appears to reflect a new policy of dropping corruption-related cases<sup>3</sup>—it is essential that the Commission enforce the law and vindicate these core transparency principles.
4. This complaint is filed with the FEC pursuant to 52 U.S.C. § 30109(a)(1), and is based on information and belief that Ogles and Andy Ogles for Congress have violated 52 U.S.C.

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<sup>1</sup> Ogles's false campaign finance reports are part of a long series of misrepresentations and outright falsehoods regarding his background and activities. For example, Ogles has repeatedly claimed to be an "economist" who formerly worked in "law enforcement" and "worked in international sex crimes" or "human trafficking," despite the fact that he lacks a meaningful background in any of those fields. See Phil Williams, *REVEALED: Businessman, Economist, Cop, International Sex Crimes Expert? The Stories of Congressman Andy Ogles*, NewsChannel 5 Nashville (Feb. 16, 2023), <https://www.newschannel5.com/news/newschannel-5-investigates/businessman-economist-cop-international-sex-crimes-expert-the-stories-of-congressman-andy-ogles>. Ogles has also claimed that he spent eight years working for a consulting firm that does not appear to exist, and that he brokered eight figures in tax incentives for a film deal that officials have never heard of, on behalf of a company that does not appear to exist. See Glenn Kessler, *Tennessee Congressman Andrew Ogles's Résumé is too Good to be True*, Wash. Post (Mar. 10, 2023), <https://www.washingtonpost.com/politics/2023/03/10/tennessee-congressman-andrew-ogless-rsum-is-too-good-be-true>.

<sup>2</sup> See Phil Williams, *Career Prosecutors Withdraw from Federal Criminal Investigation of GOP Congressman Andy Ogles*, NewsChannel 5 Nashville (Jan. 31, 2025), [https://www.newschannel5.com/news/newschannel-5-investigates/career-prosecutors-withdraw-from-federal-criminal-investigation-of-gop-congressman-andy-ogles#google\\_vignette](https://www.newschannel5.com/news/newschannel-5-investigates/career-prosecutors-withdraw-from-federal-criminal-investigation-of-gop-congressman-andy-ogles#google_vignette).

<sup>3</sup> See Ryan J. Reilly, *et al.*, *Justice Department Office that Prosecutes Public Corruption Slashed in Size, Sources Say*, NBC News (Mar. 11, 2025), <https://www.nbcnews.com/politics/justice-department/justice-department-office-prosecutes-public-corruption-slashed-size-so-rcna195928> (stating that "[t]he Trump administration is gutting the Justice Department's unit that oversees prosecutions of public officials accused of corruption" and moved to dismiss campaign-finance charges against New York Mayor Eric Adams); see also Noah Lanard, *The Great Pretender*, Mother Jones (May-June 2025 Issue), <https://www.motherjones.com/politics/2025/04/andy-ogles-scandal-maga-trump-profile-gop-sad-loan-santos/> (noting that Ogles is a close ally of President Trump).

§ 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>4</sup>

#### FACTUAL BACKGROUND

5. Andy Ogles currently represents Tennessee’s 5<sup>th</sup> congressional district.<sup>5</sup> He won election in 2022, was re-elected in 2024, and has filed a Statement of Candidacy for 2026.<sup>6</sup> Ogles’s principal campaign committee is Andy Ogles for Congress, and Thomas Datwyler is its treasurer (collectively, the “Committee”).<sup>7</sup>

#### ***Falsely Reported \$320,000 Loan, OCE Investigation, and DOJ Investigation***

6. On its 2022 Pre-Primary Election report, the Committee disclosed receiving a \$320,000 loan on April 15, 2022, which Ogles purportedly made from his personal funds.<sup>8</sup> Ogles signed the report himself, certifying that its contents were “true, correct and complete” to the best of his knowledge.<sup>9</sup>
7. However, Ogles did not report sufficient assets to support a \$320,000 personal loan on his 2022 personal financial disclosure statement, filed with the U.S. House of

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<sup>4</sup> 52 U.S.C. § 30109(a)(2) (emphasis added); *see also* 11 C.F.R. § 111.4(a).

<sup>5</sup> Congressman Andy Ogles, <https://ogles.house.gov> (last visited Apr. 22, 2025).

<sup>6</sup> Office of Cong. Ethics, U.S. House of Reps., Review No. 24-3057: Representative Andy Ogles at 7–8 (Jun. 20, 2024), <https://oce.house.gov/sites/evo-subsites/oce.house.gov/files/evo-media-document/OCE%20Rev.%20No.%2024-3057%20Referral.pdf> (“OCE Report”); Andy Ogles, Statement of Candidacy (Nov. 11, 2024), <https://docquery.fec.gov/pdf/354/20241119719959354/20241119719959354.pdf>; Jonathan Mattise, *GOP Rep. Andy Ogles Wins Tennessee Reelection While Under FBI Probe of Campaign Finances*, AP (Nov. 5, 2024), <https://apnews.com/article/andy-ogles-reelection-fbi-investigation-43a775b9d3ceb410ef9d7bf4cbdd8667>.

<sup>7</sup> Andy Ogles for Congress, Statement of Org. at 1, 2 (Mar. 12, 2024), <https://docquery.fec.gov/pdf/983/202403129622403983/202403129622403983.pdf>.

<sup>8</sup> Andy Ogles for Congress, 2022 Pre-Primary Election Report at 24 (Jul. 23, 2022), <https://docquery.fec.gov/pdf/987/202207239525041987/202207239525041987.pdf>.

<sup>9</sup> OCE Report at 8.

Representatives on May 15, 2023.<sup>10</sup> Indeed, Ogles reported no bank account, no earned or investment income, and no additional assets other than retirement accounts—from which he reported no withdrawals.<sup>11</sup>

8. The OCE opened an investigation likely based on a complaint that questioned, among other things, the source of Ogles’s purported personal loan to his campaign.<sup>12</sup> On May 15, 2024—just hours before the OCE was scheduled to interview Ogles’s campaign manager and treasurer—Ogles submitted a letter through counsel attempting to explain the apparent discrepancy, which stated: “A review of the circumstances of the April 2022 loan determined that the loan made by Representative Ogles to the campaign was not in the amount of \$320,000, but rather \$20,000 . . . While Representative Ogles had identified approximately \$320,000 in personal funds available for loan to the campaign, only \$20,000 was actually transferred.”<sup>13</sup>
9. On May 22, 2024, the Committee filed an amended 2022 Pre-Primary Election report reflecting that Ogles had only loaned his campaign \$20,000 from personal funds, not the \$320,000 it originally reported.<sup>14</sup>
10. The next day, Ogles posted a statement on Twitter (now called “X”) indicating that he had “pledged \$320,000” toward his campaign from “several documented assets, including bank and retirement accounts,” and that while he “only needed to transfer

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<sup>10</sup> See Andy Ogles, New Filer Financial Disclosure Report, Clerk of the House of Reps. (May 15, 2023), [https://disclosures-clerk.house.gov/public\\_disc/financial-pdfs/2022/10054630.pdf](https://disclosures-clerk.house.gov/public_disc/financial-pdfs/2022/10054630.pdf).

<sup>11</sup> See *id.*

<sup>12</sup> House Resolution 5 of the 119th Congress recently changed the name of the OCE to the Office of Congressional Conduct or the “OCC.” *About*, Office of Cong. Ethics, <https://oce.house.gov/about#:~:text=In%20H.,OCC%20while%20updates%20are%20pending>. (last visited Apr. 14, 2025). The events in this complaint predate the name change, so the complaint refers to the Office as the “OCE.”

<sup>13</sup> See OCE Report at 8.

<sup>14</sup> Andy Ogles for Congress, 2022 Amend. Pre-Primary Report at 43 (May 22, 2024), <https://docquery.fec.gov/pdf/811/202405229648716811/202405229648716811.pdf>.

\$20,000” to his campaign, “unfortunately, the full amount of my pledge was mistakenly included on my campaign’s FEC reports.”<sup>15</sup>

11. On August 2, 2024, the OCE transmitted to the U.S. House Committee on Ethics its report, which was publicly released on January 2, 2025,<sup>16</sup> finding “substantial reason to believe that Rep. Ogles omitted or misrepresented required information in his financial disclosure statements or FEC candidate committee reports.”<sup>17</sup> The report concludes that Ogles’s false loan reporting was not a mistake, but a deliberate attempt—orchestrated by Ogles—to inflate his campaign’s cash on hand and thus appear more competitive in a crowded primary election.<sup>18</sup>
12. During the OCE’s investigation, its staff deposed the Committee’s treasurer, Datwyler, who asserted that Ogles did not allow him access to the Committee’s bank account.<sup>19</sup> When preparing the Committee’s 2022 Pre-Primary report, Datwyler stated, he relied on PDFs provided by Ogles that contained a “line entry for a \$320,000 ‘loan from candidate’ dated April 15, 2022.”<sup>20</sup> Datwyler stated, “I only later came to find out those weren’t actually bank statements, and they were just like a transaction printout and not an actual bank statement.”<sup>21</sup> When asked if it was unusual not to have access to a committee’s

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<sup>15</sup> @AndyOgles, X (May 23, 2024), <https://x.com/AndyOgles/status/1793703913876783529>.

<sup>16</sup> U.S. House of Reps., Comm. on Ethics, Statement of the Committee on Ethics Regarding Representative Andy Ogles (Jan. 2, 2025), <https://ethics.house.gov/press-releases/statement-of-the-committee-on-ethics-regarding-representative-andy-ogles/>.

<sup>17</sup> Office of Cong. Ethics, *OCE Referral Regarding Rep. Andy Ogles* (Jan. 2, 2025), <https://oce.house.gov/reports/investigations/oce-referral-regarding-rep-andy-ogles>.

<sup>18</sup> See OCE Report at 9, 13–14.

<sup>19</sup> See *id.* at 11.

<sup>20</sup> *Id.* at 11–12.

<sup>21</sup> *Id.* at 12.

bank records, Datwyler responded that Ogles was the only client “that I don’t have access to his bank account.”<sup>22</sup>

13. Because Ogles did not cooperate with the investigation, it is unclear “how the entry for a \$320,000 loan came to be, given that Rep. Ogles has admitted he did not loan his campaign \$320,000.”<sup>23</sup>

14. Similarly, Ogles’s campaign manager, who was also deposed, averred that he did not have access to the campaign’s bank account and that he “merely regurgitated information provided by Rep. Ogles” with regard to the Committee’s finances.<sup>24</sup>

15. The OCE also obtained documentation that, when the media began scrutinizing the loan, Ogles told his campaign treasurer and manager that the source of the loan was actually a “line of credit backed by his home.”<sup>25</sup> He did not tell them, at any time prior to his admission to the OCE, that the actual amount of the loan was \$20,000.<sup>26</sup>

16. Ogles appears to have been aware that the Committee’s finances were tighter than its FEC reports reflected: Ogles’s treasurer asserted that, even after adjusting the Committee’s cash on hand down \$300,000 (to account for the portion of the reported loan from Ogles that wasn’t real), the Committee never dipped into the negative or spent general election funds during the primary (which would have represented a distinct violation of FECA).<sup>27</sup> The campaign manager also said, “anytime there was a

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<sup>22</sup> *Id.*

<sup>23</sup> *Id.*

<sup>24</sup> *Id.*

<sup>25</sup> *Id.* at 13.

<sup>26</sup> *See id.* It is unclear why the Committee’s treasurer did not amend the Committee’s FEC reports to reflect that the loan came from a line of credit rather than the candidate’s personal funds, when he received this explanation.

<sup>27</sup> *Id.* at 10.

question . . . of what could we spend and where could we spend it, how could we spend it, it was always, that’s an Andy question, that’s an Andy question, direct that to Andy.”<sup>28</sup>

17. Finally, the OCE report suggests—based at least partly on Ogles’s treasurer’s deposition—that Ogles might have been motivated to inflate the Committee’s reported funds because he was competing in a primary “in which multiple other candidates had raised or loaned their campaign hundreds of thousands, if not millions, of dollars.”<sup>29</sup>
18. Because FECA requires that loans be continually reported until they are paid or otherwise extinguished, the false \$320,000 loan appeared on 23 of the Committee’s subsequent disclosure reports.<sup>30</sup> The campaign treasurer stated that Ogles reviewed the Committee’s FEC reports,<sup>31</sup> and the OCE found that Ogles drafted press statements referring to the Committee’s fundraising totals.<sup>32</sup> At no point did he set the record straight about the loan amount or the Committee’s actual cash on hand total.
19. The OCE’s investigation confirmed that Ogles opened a \$700,000 line of credit in September 2022—several months *after* the reported loan to his campaign—that he did not report on his personal financial disclosure report.<sup>33</sup> News reporting disclosed that Ogles’s in-laws guaranteed that \$700,000 line of credit.<sup>34</sup> The OCE could not confirm

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<sup>28</sup> Office of Cong. Ethics, U.S. House of Reps., Review No. 24-3057: Representative Andy Ogles (Jun. 20, 2024), OCE Exhibits at 24-3057\_0070, <https://ethics.house.gov/wp-content/uploads/2025/01/OCE-Report-and-Findings-Exhibits-1.pdf> (“OCE Exhibits”).

<sup>29</sup> OCE Report at 13–14.

<sup>30</sup> See Browse Filings – Andy Ogles for Congress, FEC, [https://www.fec.gov/data/filings/?data\\_type=processed&q\\_filer=C00811844&cycle=2024&form\\_type=F13&form\\_type=F3&form\\_type=F3L&form\\_type=F3P&form\\_type=F3X&form\\_type=F4&form\\_type=F5&form\\_type=F7](https://www.fec.gov/data/filings/?data_type=processed&q_filer=C00811844&cycle=2024&form_type=F13&form_type=F3&form_type=F3L&form_type=F3P&form_type=F3X&form_type=F4&form_type=F5&form_type=F7) (last visited Mar. 2, 2025).

<sup>31</sup> OCE Exhibits at 24-3057\_0014.

<sup>32</sup> OCE Report at 11; *see also* OCE Exhibits at 24-3057\_0060.

<sup>33</sup> OCE Report at 17.

<sup>34</sup> Phil Williams, *He Doesn’t Report Having Checking or Savings. So Where Did Andy Ogles get \$320,000 for His Campaign?*, NewsChannel5 Nashville (Nov. 29, 2023), <https://www.newschannel5.com/news/newschannel-5-investigates/revealed/he-doesnt-report-having-checking-or-savings-so-where-did-andy-ogles-get-320-000-for->

that the \$20,000 loan came from Ogles’s personal funds and expressed skepticism that he had enough money available to make the loan.<sup>35</sup> The report concluded that, if the campaign loan came instead from the line of credit, the Committee may have accepted an excessive contribution in addition to continuing to misreport the source of the loan.<sup>36</sup>

20. During the course of the OCE proceedings, DOJ began separately investigating Ogles for criminal campaign finance violations.<sup>37</sup> In August 2024, the Federal Bureau of Investigation (“FBI”) seized his cell phone.<sup>38</sup> However, in late January 2025, the U.S. Attorney’s Office for the Middle District of Tennessee, which had been leading the investigation, withdrew its participation, seemingly putting an end to the criminal probe.<sup>39</sup> The withdrawal is consistent with DOJ’s new policy—ushered in by the change of administration—of dropping corruption-related cases.<sup>40</sup>

### ***Reported Disbursements to “JL Tech Sales”***

21. In addition to the misreported “personal loan” from Ogles, the Committee made many other significant reporting errors.
22. Between July 2022 and July 2024, the Committee reported making \$14,209.50 in disbursements to “JL Tech Sales.”<sup>41</sup>

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[campaign](https://www.motherjones.com/politics/2025/01/andy-ogles-oce-investigation-campaign-finance-santos/); see also Noah Lanard, *A GOP Congressman’s Campaign Finance Problem Just Got Worse*, Mother Jones (Jan. 15, 2025), <https://www.motherjones.com/politics/2025/01/andy-ogles-oce-investigation-campaign-finance-santos/>.

<sup>35</sup> OCE Report at 17–18.

<sup>36</sup> *Id.*

<sup>37</sup> See @AndyOgles, X (Aug. 6, 2024), <https://x.com/AndyOgles/status/1820916720510357929>.

<sup>38</sup> *Id.*

<sup>39</sup> See Williams, *supra* note 2.

<sup>40</sup> See *supra* note 3.

<sup>41</sup> See Browse Disbursements (search with “Spender Name or ID” as “Andy Ogles for Congress” and “Recipient Name or ID” as “JL Tech Sales”), FEC, [https://www.fec.gov/data/disbursements/?data\\_type=processed&committee\\_id=C00811844&recipient\\_name=JL+Tech+Sales](https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00811844&recipient_name=JL+Tech+Sales) (last visited Mar. 26, 2025).



23. The Committee originally reported the address for “JL Tech Sales” as “4027 S Access Rd B, Chattanooga, TN, 37406,” using that address through its October 15, 2024, disclosure report.<sup>42</sup> On November 11, 2024, the Committee filed five amended reports disclosing a new address for JL Tech Sales: 134 Main Street, Pennington Gap, VA, 24277-3229.<sup>43</sup> Originally, the Committee also reported a purpose of “Office Supplies: Internet & TV Services” for six of the JL Tech Sales disbursements,<sup>44</sup> but later changed the stated purposes of the disbursements to simply “Office Supplies” in the amended filings.<sup>45</sup>
24. However, there appears to be no business called “JL Tech Sales” in Tennessee, Virginia, or anywhere else, for that matter.<sup>46</sup> The company at the originally disclosed address in

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<sup>42</sup> See, e.g., Andy Ogles for Congress, 2022 October Quarterly Report at 98 (Oct. 15, 2022), <https://docquery.fec.gov/pdf/322/202210159536888322/202210159536888322.pdf>; Andy Ogles for Congress, 2024 October Quarterly Report at 88 (Oct. 15, 2024), <https://docquery.fec.gov/pdf/763/202410159698272763/202410159698272763.pdf>.

<sup>43</sup> See, e.g., Andy Ogles for Congress, 2022 Amend. October Quarterly at 127 (Nov. 11, 2024), <https://docquery.fec.gov/pdf/282/202411119719961282/202411119719961282.pdf>; Andy Ogles for Congress, 2022 Amend. Post-General Report at 70 (Nov. 11, 2024), <https://docquery.fec.gov/pdf/450/202411119719961450/202411119719961450.pdf>; Andy Ogles for Congress, 2024 Amend. July Quarterly Report at 155 (Nov. 11, 2024), <https://docquery.fec.gov/pdf/549/202411119719961549/202411119719961549.pdf>; Andy Ogles for Congress, 2024 Amend. 12-Day Pre-Primary Report at 16 (Nov. 11, 2024), <https://docquery.fec.gov/pdf/721/202411119719961721/202411119719961721.pdf>; Andy Ogles for Congress, 2024 Amend. October Quarterly Report at 79 (Nov. 11, 2024), <https://docquery.fec.gov/pdf/745/202411119719961745/202411119719961745.pdf>.

<sup>44</sup> See Andy Ogles for Congress, 2022 October Quarterly Report at 98, 101, 104, 107, 109 (Oct. 15, 2022), <https://docquery.fec.gov/pdf/322/202210159536888322/202210159536888322.pdf>.

<sup>45</sup> See Andy Ogles for Congress, 2022 Amend. October Quarterly Report at 123, 127, 128, 131, 132, 133 (Jan. 5, 2023), <https://docquery.fec.gov/pdf/980/202301059574287980/202301059574287980.pdf>.

<sup>46</sup> No company named “JL Tech Sales” appears in Tennessee’s or Virginia’s corporate records. See TN Dep’t of State, Business Entity Search (search for “JL Tech Sales”), <https://tncab.tnsos.gov/business-entity-search> (last visited Mar. 26, 2025); VA State Corp. Comm’n, Clerk’s Information System Business Entity Search (search for “JL Tech Sales”), <https://cis.scc.virginia.gov/EntitySearch/Index> (last visited Mar. 26, 2025). There is no company called “JL Tech Sales” registered anywhere. See Search results for “JL Tech Sales,” OpenCorporates, [https://opencorporates.com/companies?utf8=%E2%9C%93&utf8=%E2%9C%93&q=jl+tech+sales&jurisdiction\\_code=&type=companies](https://opencorporates.com/companies?utf8=%E2%9C%93&utf8=%E2%9C%93&q=jl+tech+sales&jurisdiction_code=&type=companies) (last visited Mar. 26, 2025). No other federal committee has reported disbursing funds to “JL Tech Sales.” See Disbursements to “JL Tech Sales,” [https://www.fec.gov/data/disbursements/?data\\_type=processed&recipient\\_name=jl+tech+sales](https://www.fec.gov/data/disbursements/?data_type=processed&recipient_name=jl+tech+sales) (last visited Mar. 26, 2025).

Chattanooga, TN—which claims to have been in business there for over two decades—is named simply “Technology Sales” and sells “industrial and mechanical plastics.”<sup>47</sup>

25. The owner of a business located at the Pennington Gap, VA, address—who claimed that the business is actually called “USA Custom Solutions” but had billed the Committee using the name “JL Tech . . . [b]ecause it’s shorter”<sup>48</sup>—acknowledged that the business does not sell “office supplies” but instead provided “texting services” and “ringless voicemail services” for Ogles’s campaign.<sup>49</sup> The business owner also asserted that “he billed Ogles for services in 2024 that were never provided, and he had never gotten around to paying the money back nor had Ogles asked to be reimbursement for the money paid out by his campaign.”<sup>50</sup>

#### ***Other Miscellaneous Issues with Reported Disbursements***

26. On October 20, 2022, the Committee reported paying \$11,150 to “Mass Market” at 2937 Sierra Ct SW, Iowa City, IA 52240-8503 for “food and beverage.”<sup>51</sup> There is a call center

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<sup>47</sup> See Phil Williams, *Questions About Congressman’s Campaign Spending: Mysterious Companies, Bogus Addresses*, NewsChannel 5 Nashville (Mar. 24, 2025), <https://www.newschannel5.com/news/newschannel-5-investigates/questions-about-congressmans-campaign-spending-mysterious-companies-bogus-addresses> (“But when *NewsChannel 5 Investigates* searched that address in Chattanooga, we found a company there called Technology Sales. Its exterior sign describes its services as ‘plexiglass, nylon, Teflon.’ Its website said it is in the business of producing ‘industrial and mechanical plastics.’ There was nothing about office supplies, nothing about TV or Internet services. Eventually, NewsChannel 5 reached the company at that address — and the person who answered the phone insisted they knew nothing about Andy Ogles or JL Tech Sales. ‘And there’s never been another company by that name at this address – in the last couple of years?’ we followed up. ‘No, this business has been here 25 or 30 years — same business,’ the man answered.”).

<sup>48</sup> On February 5, 2025, someone named Michael Longacre registered “USA Custom Solutions” at 134 Main Street, Pennington Gap, VA as a fictitious name (also known as a “doing business as” or “dba” name). See *Entity Information: USA Customs Solutions*, State of Virginia Corporation Commission Clerk’s Information System, <https://cis.scc.virginia.gov/EntitySearch/BusinessInformation?businessId=11801760&source=FromEntityResult&isSeries%20=%20false> (last visited Apr. 14, 2025).

<sup>49</sup> Williams, *Questions About Congressman’s Campaign Spending*, *supra* note 47 (“The man claimed that his company, USA Custom Solutions, provided services for the Ogles campaign, but sent the bills out as “JL Tech.” His explanation: ‘Because it’s shorter.’ ‘We provided . . . texting services and ringless voice mail services for his campaign,’ the man continued. ‘So, when he was campaigning, we would send out bulk texts to the databases that he provided, inviting people to his events or whatever he had going on in his campaign. That’s all we did for him.’”).

<sup>50</sup> *Id.*

<sup>51</sup> See Andy Ogles for Congress, 2022 Amend. Post-General Report at 67 (Nov. 11, 2024), <https://docquery.fec.gov/cgi-bin/fecimg/?202411119719961516>.

run by a company doing business as “Mass Markets” at that address, but it does not appear to provide “food and beverage” services.<sup>52</sup>

27. On November 4, 2022, the Committee reported disbursing \$1,000 to “Strategic Advanscale” at 611 Pennsylvania Ave. SE, Washington, DC, 20003-4303.<sup>53</sup> That address is a UPS store on Capitol Hill.<sup>54</sup> There is no company called “Strategic Advanscale” registered in Washington, DC, or anywhere else in the United States.<sup>55</sup>
28. During the 2022 election cycle, the Committee reported disbursing a total of \$8,327.50 to “Tachyon” at 6191 State Highway 161, Irving, TX, 75014 for “campaign consulting” in 2022.<sup>56</sup> Tachyon Technologies is an enterprise IT company located at a different address—508 Silicon Dr #100, Southlake, TX 76092—and there is no indication that it offers campaign consulting services.<sup>57</sup>
29. On February 8, 2024, the Committee reported disbursing \$1,160 to “In a Par” at “1849 C S, Gallatin, TN 37066”—which does not appear to be a real street address—for

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<sup>52</sup> See *Global BPO Call Centers*, MCI, <https://www.mci.world/service-delivery-locations/> (last visited Mar. 26, 2025).

<sup>53</sup> See Andy Ogles for Congress, 2022 Amend. Post-General Report at 83 (Nov. 11, 2024), <https://docquery.fec.gov/cgi-bin/fecimg/?202411119719961532>.

<sup>54</sup> See The UPS Store Capitol Hill, <https://locations.theupsstore.com/dc/washington/611-pennsylvania-ave-se> (last visited Mar. 26, 2025).

<sup>55</sup> See Advanced Search (results for “Strategic Advanscale” within the United States), OpenCorporates, <https://opencorporates.com/companies/country/us?q=strategic+advanscale&type=companies&utf8=%E2%9C%93> (last visited Mar. 26, 2025).

<sup>56</sup> See Disbursements (search results for recipient “Tachyon” with spender name “Andy Ogles for Congress”), FEC, [https://www.fec.gov/data/disbursements/?data\\_type=processed&committee\\_id=C00811844&recipient\\_name=tachyon](https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00811844&recipient_name=tachyon) (last visited Mar. 26, 2025).

<sup>57</sup> See Tachyon, <https://www.tachyontech.com> (last visited Mar. 26, 2025).

“Fundraising Event Fees.”<sup>58</sup> Furthermore, there is no company called “In a Par” registered in Tennessee or anywhere else in the United States.<sup>59</sup>

30. The Committee reported three disbursements totaling \$3,520 to Venmo between July 2023 and November 2024, two for “office supplies” and one for “campaign consulting.”<sup>60</sup> Venmo is a payment processing company and there is no information indicating that it provides either office supplies or campaign consulting services.

## SUMMARY OF THE LAW

### *Disbursement Reporting*

31. FECA requires each treasurer of a political committee to file with the Commission regular reports disclosing, among other items, the committee’s disbursements.<sup>61</sup> 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—a brief “description of why the disbursement was made”<sup>62</sup>—of such payments.<sup>63</sup>

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<sup>58</sup> Andy Ogles for Congress, 2024 Amend. April Quarterly Report at 56 (Jul. 17, 2025), <https://docquery.fec.gov/cgi-bin/fecimg/?202407179661210660>; Google Maps, Search results for “1849 C S Gallatin TN,” Google Maps, <https://www.google.com/maps/search/1849+c+s+gallatin+tn/> (showing no match) (last visited Mar. 26, 2025).

<sup>59</sup> Advanced Search (results for “In a Par” within the United States), OpenCorporates, <https://opencorporates.com/companies/country/us?q=in+a+par&type=companies&utf8=%E2%9C%93> (last visited Mar. 26, 2025).

<sup>60</sup> See Andy Ogles for Congress, 2024 Amend. Post-General Report at 19 (Jan. 21, 2025), <https://docquery.fec.gov/cgi-bin/fecimg/?202501219747640800>; Andy Ogles for Congress, Amend. 2024 July Quarterly Report at 125 (Nov. 11, 2024), <https://docquery.fec.gov/cgi-bin/fecimg/?202411119719961673>; Andy Ogles for Congress, Amend. 2024 October Quarterly Report at 45 (Jul. 17, 2024), <https://docquery.fec.gov/cgi-bin/fecimg/?202407179661210412>.

<sup>61</sup> 52 U.S.C. § 30104(a)(1); 11 C.F.R. § 104.1(a).

<sup>62</sup> 11 C.F.R. § 104.3(b)(3)(i).

<sup>63</sup> 52 U.S.C. § 30104(b)(5)–(6); 11 C.F.R. §§ 104.3(b)(4)(i), (vi), 104.9(a)–(b).

32. A committee’s failure to properly itemize its disbursements—including by providing inaccurate information regarding the recipient(s) or purpose for a disbursement—leaves voters in the dark about the entities working for the committee and the nature of the goods or services provided. That denies voters their informational interest in knowing “where political campaign money comes from and how it is spent,”<sup>64</sup> and undermines the bedrock transparency necessary for voters to meaningfully evaluate candidates and “make informed decisions.”<sup>65</sup>
33. 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.”<sup>66</sup> In MUR 7923, likewise, a campaign used generic “consulting” labels to describe payments for items like “lodging” and “food & beverage,” resulting in a \$125,000 penalty.<sup>67</sup> These six-figure penalties are commensurate with the substantial harm inflicted on the public when a committee obscures the purpose of its expenditures.
34. Efforts to conceal the actual *recipients* of campaign spending have resulted in even more severe penalties, 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

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<sup>64</sup> *Buckley v. Valeo*, 424 U.S. 1, 66 (1976).

<sup>65</sup> *Citizens United v. FEC*, 558 U.S. 310, 371 (2010).

<sup>66</sup> Conciliation Agreement, MURs 7291 and 7449 (DNC Servs. Corp./DNC) (Feb. 22, 2022), [https://www.fec.gov/files/legal/murs/7291/7291\\_53.pdf](https://www.fec.gov/files/legal/murs/7291/7291_53.pdf).

<sup>67</sup> Conciliation Agreement, MUR 7923 (Friends of David Schweikert) (Jan. 12, 2022), [https://www.fec.gov/files/legal/murs/7923/7923\\_27.pdf](https://www.fec.gov/files/legal/murs/7923/7923_27.pdf).

numerous felony charges including defrauding donors.<sup>68</sup> 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.<sup>69</sup>

### ***Loan Reporting***

35. When a campaign receives a loan, it is required to report information about the loan on Schedule C of its disclosure report.<sup>70</sup> It must report the existence of the loan on every report until the loan is extinguished.<sup>71</sup>
36. When a candidate loans money to their campaign using personal funds, the campaign must indicate that on Schedule C and provide the amount of the loan, the date it was made, and the due date and interest rate, if applicable.<sup>72</sup>
37. If a candidate uses the proceeds of a loan they obtained from a bank or from a line of credit (such as a home equity line of credit) to lend their campaign money, then more information is required on the campaign's disclosure report. The campaign must provide the above information, in addition to the name and address of the lending institution, the

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<sup>68</sup> *CLC Files Complaint Alleging Rep. George Santos Violated Federal Campaign Finance Laws*, CLC (Jan. 9, 2023), <https://campaignlegal.org/document/clc-files-complaint-alleging-rep-george-santos-violated-federal-campaign-finance-laws>; Press Release, Former Congressman George Santos Pleads Guilty to Wire Fraud and Aggravated Identity Theft, Dep't of Justice (Aug. 19, 2024), <https://www.justice.gov/usao-edny/pr/former-congressman-george-santos-pleads-guilty-wire-fraud-and-aggravated-identity>.

<sup>69</sup> 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>.

<sup>70</sup> 11 C.F.R. § 104.3(d).

<sup>71</sup> *Id.*

<sup>72</sup> See 52 U.S.C. § 30104(b)(3)(E); FEC, Form 3 (Report of Receipts and Disbursements for an Authorized Committee), Schedule C (rev. May 2016), <https://www.fec.gov/resources/cms-content/documents/policy-guidance/fecfrm3.pdf>.

types and value of collateral used to secure the loan, and anyone else who provided collateral or endorsed or guaranteed the loan.<sup>73</sup>

38. Importantly, any person guaranteeing or endorsing a candidate's loan makes a contribution to the campaign.<sup>74</sup> That means that a person can only endorse or guarantee a loan in an amount that does not exceed the applicable contribution limit. For the 2022 election cycle, individuals were allowed to contribute \$2,900 per election to a candidate.<sup>75</sup> It is unlawful for a person to knowingly make, and for a campaign to accept, an excessive contribution.<sup>76</sup>

## CAUSES OF ACTION

### COUNT I:

#### **ANDY OGLES AND ANDY OGLES FOR CONGRESS MISREPORTED INFORMATION ABOUT A LOAN IN VIOLATION OF 52 U.S.C. § 30104(B), AND APPEAR TO HAVE ACCEPTED AN EXCESSIVE CONTRIBUTION IN THE FORM OF THE LOAN IN VIOLATION OF 52 U.S.C. § 30116(F)**

39. The available information supports finding reason to believe that Ogles and the Committee misreported the true amount and source of a \$20,000 loan that Ogles reported making from his personal funds during his 2022 primary election.
40. On his 2022 Pre-Primary Election Report, Ogles reported loaning the Committee \$320,000 on April 15, 2022, from his personal funds.<sup>77</sup> He continued to report that \$320,000 loan, and included the loan amount in the Committee's cash on hand, in 23 subsequently filed disclosure reports.<sup>78</sup>

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<sup>73</sup> See 52 U.S.C. § 30104(b)(3)(E); 11 C.F.R. § 104.3(d)(4); FEC, Form 3 (Report of Receipts and Disbursements for an Authorized Committee), Schedule C & C-1, *supra* note 72.

<sup>74</sup> 11 C.F.R. § 100.52(b)(3).

<sup>75</sup> *Contribution Limits for 2021–2022*, FEC (Jan. 2021), [https://www.fec.gov/resources/cms-content/documents/contribution\\_limits\\_chart\\_2021-2022.pdf](https://www.fec.gov/resources/cms-content/documents/contribution_limits_chart_2021-2022.pdf).

<sup>76</sup> 52 U.S.C. § 30116(f).

<sup>77</sup> Andy Ogles for Congress, 2022 Pre-Primary Election Report at 24, *supra* note 8.

<sup>78</sup> See Browse Filings – Andy Ogles for Congress, *supra* note 30.

41. The OCE launched an investigation into the loan, as it did not appear from Ogles’s financial disclosure filings that he had sufficient money or assets to loan his campaign \$320,000.<sup>79</sup> During that investigation, Ogles admitted that the amount of the loan was only \$20,000, and the Committee amended its reporting to fix the \$300,000 discrepancy.<sup>80</sup>
42. As such, there is reason to believe Ogles and the Committee violated 52 U.S.C. § 30104(b) by initially reporting the false loan amount of \$320,000, and then reporting \$300,000 of decreased activity in its amended reports.<sup>81</sup> These violations denied voters, as well as other federal candidates and PACs, crucial information about the amount of the loan and the Committee’s cash on hand for two years, including throughout the 2022 primary and general elections.
43. In addition, there is reason to believe that the Committee has filed false reports regarding the *source* of the \$20,000 loan and, in fact, knowingly accepted an excessive contribution resulting from a loan guarantee by Ogles’s in-laws.
44. The OCE, during its investigation, could not confirm that the loan came from Ogles’s personal funds.<sup>82</sup> Ogles’s explanation for the loan’s source—facing media scrutiny about the loan, he told his campaign treasurer and manager that it was derived from a “line of credit backed by his home”<sup>83</sup>—appears implausible, because the OCE found that Ogles did not have an available line of credit until September 2022, several months *after* the Committee reportedly received the loan.<sup>84</sup>

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<sup>79</sup> See OCE Report at 8.

<sup>80</sup> *Id.*; see Andy Ogles for Congress, 2022 Amend. Pre-Primary Report at 43, *supra* note 14.

<sup>81</sup> See 52 U.S.C. § 30104(b)(3)(E).

<sup>82</sup> OCE Report at 17–18.

<sup>83</sup> *Id.* at 13.

<sup>84</sup> *Id.* at 17.



45. However, there is reason to believe the loan resulted in an excessive campaign contribution from Ogles’s family: News reports revealed that Ogles’s in-laws guaranteed the line of credit, which was worth \$700,000.<sup>85</sup> Accordingly, if Ogles lent his campaign \$50,000 drawn from a line of credit that his in-laws guaranteed, his in-laws made excessive contributions, and Ogles and the Committee knowingly accepted those unlawful contributions.<sup>86</sup>

***Ogles’s Violations Were Knowing and Willful***

46. Moreover, there is ample evidence for the Commission to find reason to believe Ogles committed these reporting violations, and accepted excessive contributions, with knowing and willful intent.

47. 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>87</sup>

48. The knowing and willful standard does not require proving knowledge of the specific statute or regulation that was violated.<sup>88</sup> Rather, it is sufficient to demonstrate that a respondent “acted voluntarily and was aware that his conduct was unlawful.”<sup>89</sup> This awareness may be shown through circumstantial evidence, such as a person’s efforts to disguise their actions.<sup>90</sup>

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<sup>85</sup> Williams, *He Doesn’t Report Having Checking or Savings*, *supra* note 34.

<sup>86</sup> See 11 C.F.R. § 100.52(b)(3) (stating that loan guarantors make contributions); *see also* 52 U.S.C. §§ 30116(a)(1)(A), (f); *Contribution Limits for 2021-2022*, *supra* note 74.

<sup>87</sup> 122 Cong. Rec. H3778 (daily ed. May 3, 1976).

<sup>88</sup> *See United States v. Danielczyk*, 917 F. Supp. 2d 573, 579 (E.D. Va. 2013).

<sup>89</sup> *Id.*

<sup>90</sup> *United States v. Hopkins*, 916 F.2d 207, 213–15 (5th Cir. 1990).

49. The OCE report documents several measures Ogles took to conceal information about the loan from campaign personnel and the OCE, suggesting he was “aware that his conduct was unlawful.”<sup>91</sup>
50. First, Ogles appears to have provided his campaign treasurer with false or misleading documentation of a \$320,000 transaction that never occurred to induce the treasurer into filing false reports.<sup>92</sup>
51. Second, Ogles blocked campaign personnel, including the treasurer and campaign manager, from accessing the Committee’s bank account and learning there was a \$300,000 difference between the amount in the account and the Committee’s reported cash on hand.<sup>93</sup>
52. Third, Ogles appeared to know that the Committee had less money than it was showing in its FEC reports. According to the campaign manager, Ogles controlled how much money the Committee spent, and all questions about “[w]hat could we spend and where could we spend it” were “Andy question[s].”<sup>94</sup> By unilaterally controlling the Committee’s finances, Ogles made sure that the Committee never spent more than what was actually in its bank account.<sup>95</sup>
53. Fourth, according to the Committee treasurer, Datwyler, Ogles reviewed each report the Committee filed.<sup>96</sup> He even signed the report initially disclosing the loan and drafted press statements about the Committee’s fundraising totals.<sup>97</sup> It is thus implausible that

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<sup>91</sup> See *Danielczyk*, 917 F. Supp. 2d at 579.

<sup>92</sup> See OCE Report at 11–12.

<sup>93</sup> See *id.*

<sup>94</sup> See OCE Exhibits at 24-3057\_0070.

<sup>95</sup> See OCE Report at 10.

<sup>96</sup> See OCE Exhibits at 24-3057\_0014.

<sup>97</sup> See OCE Report at 8, 11; see also OCE Exhibits at 24-3057\_0060.

Ogles did not notice the \$300,000 “discrepancy” that appeared across 24 reports. Rather, it appears that he was aware of the reported amount of the loan and deliberately chose not to correct it.

54. Fifth, Ogles gave conflicting explanations of the loan when confronted with questions about how he could have afforded to lend his campaign \$320,000. He told his campaign manager and treasurer that the loan actually came from a line of credit rather than his personal funds,<sup>98</sup> while he told the OCE and the public that there was a mix-up between the amount he identified or pledged from his personal funds and what he actually loaned the Committee.<sup>99</sup> Crucially, Ogles only admitted “error” and corrected the amount of the loan when the OCE was on verge of deposing his campaign manager and treasurer, and Ogles did not otherwise cooperate with the OCE’s investigation.<sup>100</sup>
55. Finally, Ogles had a motive to lie about the loan amount. As both Datwyler and the OCE observed, Ogles was in a hotly contested primary election in 2022 with several well-funded candidates.<sup>101</sup> Inflating the Committee’s cash on hand, and touting his ability to self-fund his campaign, gave him an advantage in the crowded field.<sup>102</sup>
56. In light of this mountain of evidence and the fact that Ogles appears to have tried to obscure the source of the \$20,000 loan—he refused to produce bank records to the OCE and does not appear to have had \$20,000 to lend his campaign<sup>103</sup>—the Commission should find that Ogles’s aforementioned FECA violations were knowing and willful.

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<sup>98</sup> See OCE Report at 13.

<sup>99</sup> See *id.* at 8; @AndyOgles, X (May 23, 2024), *supra* note 15.

<sup>100</sup> See OCE Report at 8, 12.

<sup>101</sup> See *id.* at 13–14.

<sup>102</sup> See *id.*

<sup>103</sup> See OCE Report at 17–18.

**COUNT II:**  
**ANDY OGLES AND ANDY OGLES FOR CONGRESS MISREPORTED  
DISBURSEMENT INFORMATION, IN VIOLATION OF 52 U.S.C. § 30104(B)**

57. The available information also supports finding reason to believe that Ogles and the Committee misreported required information about a series of disbursements, in violation of 52 U.S.C. § 30104(b).
58. Most egregiously, the Committee has reported paying “JL Tech Sales” over \$14,000 since 2022,<sup>104</sup> but it is not clear who actually received those payments or for what purpose.
59. The Committee initially misreported the address of “JL Tech Sales” but made corrections across several amended reports, switching JL Tech Sales’s location from Tennessee to Virginia.<sup>105</sup> However, according to the Virginia State Corporation Commission, there is no company named “JL Tech Sales” operating in the state.<sup>106</sup>
60. A journalist met with the purported owner of “JL Tech Sales,” who claimed that the real name of the company is “USA Custom Solutions,” but he sends out invoices under the name “JL Tech . . . [b]ecause its shorter.”<sup>107</sup> “USA Custom Solutions,” however, was not registered with the Virginia State Corporation Commission until February 5, 2025, years after the Committee’s purported disbursements began and after Ogles’s reporting became the subject of intense media scrutiny and a criminal investigation.<sup>108</sup>

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<sup>104</sup> See Browse Disbursements (search with “Spender Name or ID” as “Andy Ogles for Congress” and “Recipient Name or ID” as “JL Tech Sales”), *supra* note 41.

<sup>105</sup> See FEC reports, *supra* note 43.

<sup>106</sup> See *supra* note 46.

<sup>107</sup> Williams, *Questions About Congressman’s Campaign Spending*, *supra* note 47.

<sup>108</sup> *Entity Information: USA Customs Solutions*, State of Virginia Corporation Commission Clerk’s Information System, *supra* note 48.

61. Furthermore, despite the Committee’s reports stating that “JL Tech Sales” provided “office supplies,” the company’s owner told the reporter that he provided Ogles with “texting services” and “ringless voicemail services,” to the extent he provided any services at all.<sup>109</sup> The owner admitted that the Committee paid “JL Tech Sales” for services in 2024 that the company did not end up providing, and the company had not refunded the money.<sup>110</sup>
62. These facts support finding reason to believe the Committee has reported false purpose descriptions for the “JL Tech Sales” payments and may not be reporting the vendor’s actual name. Moreover, given that the company in question apparently did not exist at the time of the disbursements, there is reason to believe that Ogles and the Committee may have reported wholly false information regarding the true recipient and purpose behind these \$14,000 in disbursements.
63. At least two other transactions raise similar concerns about the very existence of an Ogles campaign vendor.
  - a. The Committee reported a disbursement to “Strategic Advanscale,” purportedly located at a UPS store in Washington, DC, when there is no record of a company by that name in existence anywhere in the United States.<sup>111</sup>

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<sup>109</sup> See, e.g., Andy Ogles for Congress, 2022 Amend. October Quarterly Report at 123, 127, 128, 131, 132, 133; Williams, *Questions About Congressman’s Campaign Spending*, *supra* note 47.

<sup>110</sup> See Williams, *Questions About Congressman’s Campaign Spending*, *supra* note 47.

<sup>111</sup> See Andy Ogles for Congress, 2022 Amend. Post-General Report at 83; The UPS Store Capitol Hill, *supra* note 54; Advanced Search (results for “Strategic Advanscale” within the United States), OpenCorporates, *supra* note 55.

- b. The Committee also reported making a disbursement to “In a Par” at a street address that does not exist, when there are no business records showing that any company named “In a Par” exists in the United States.<sup>112</sup>
64. As with the payments to “JL Tech Sales,” the Committee appears to be either misreporting identifying information about its vendors, or deliberately concealing the recipients of disbursements—both of which raise questions about who actually received the campaign’s money.
65. In addition, the Committee’s reporting of several other disbursements appears inconsistent with the named vendor’s business.
- a. The Committee reported paying over \$8,000 to “Tachyon,” which appears to be an IT company located in Texas.<sup>113</sup> However, the Committee states that “Tachyon” was providing it with “campaign consulting” services and assigns it a different address in Texas than the one in public records.<sup>114</sup> It is thus unclear whether the Committee is misreporting the name of one of its campaign consultants, or it is misreporting the purpose of payments it made to an IT company, as well as that company’s address.
  - b. The Committee also reported paying approximately \$11,000 to a company called “Mass Markets” for “food and beverage.”<sup>115</sup> Public records reveal that the only company named “Mass Markets” at the address on the Committee’s report is a

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<sup>112</sup> Andy Ogles for Congress, 2024 Amend. April Quarterly Report at 56; Google Maps, Search results for “1849 C S Gallatin TN, *supra* note 58; Advanced Search (results for “In a Par” within the United States), OpenCorporates, *supra* note 59.

<sup>113</sup> Disbursements (search results for recipient “Tachyon” with spender name “Andy Ogles for Congress”), FEC, *supra* note 56; Tachyon, *supra* note 57.

<sup>114</sup> See Disbursements (search results for recipient “Tachyon” with spender name “Andy Ogles for Congress”), FEC, *supra* note 56.

<sup>115</sup> See Andy Ogles for Congress, 2022 Amend. Post-General Report at 67.

call center.<sup>116</sup> Accordingly, it appears that the Committee has misreported either the purpose or recipient of this payment.

- c. Finally, the Committee has reported disbursements to Venmo for the purpose of “office supplies” and “campaign consulting.”<sup>117</sup> It appears that the Committee used Venmo to transfer payments to vendors who provided goods or services, but instead of reporting the name and address of those vendors, as the law requires, it reported Venmo as the recipient. Reporting an intermediary like Venmo, instead of the ultimate recipient of the payments, is a reporting violation that the Committee must correct.<sup>118</sup>

66. The throughline of the Committee’s widespread apparent reporting failures is that they deny voters basic, essential information about how Ogles’s campaign spent its money—which the public is entitled to know. FECA promises voters transparency, and through simple incompetence or willful malfeasance, Ogles and his Committee have denied voters that right.

67. Accordingly, the FEC should find reason to believe Ogles and the Committee violated 52 U.S.C. § 30104(b) and require the Committee to correct the public record and provide the transparency the law requires.

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<sup>116</sup> See *Global BPO Call Centers*, *supra* note 52.

<sup>117</sup> See FEC reports, *supra* note 60.

<sup>118</sup> See *supra* notes 61–62.

**PRAYER FOR RELIEF**

68. Wherefore, the Commission should find reason to believe that Andy Ogles and Andy Ogles for Congress have violated 52 U.S.C. § 30101 *et seq.*, and conduct an immediate investigation under 52 U.S.C. § 30109(a)(2).
69. 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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Counsel to the Campaign Legal Center,

April 23, 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



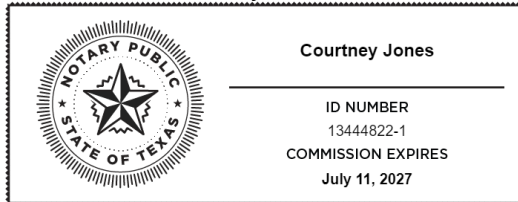
Roger G. Wieand

Sworn to and subscribed before me this 22<sup>nd</sup> day of April 2025.



Notary Public

State of Texas; County of Harris



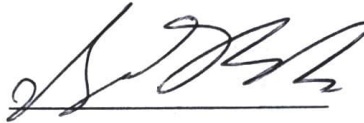
Electronically signed and notarized online using the Proof platform.

**VERIFICATION**

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

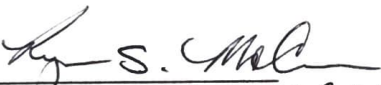
Sworn pursuant to 18 U.S.C. § 1001.

For Complainant Campaign Legal Center



Saurav Ghosh, Esq.

Sworn to and subscribed before me this 22 day of April 2025.

  
RYAN SEAN MCCANN  
Notary Public

