

BEFORE THE FEDERAL ELECTION COMMISSION

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

v. MUR No. _____

JULIO HERRERA VELUTINI
ISABELA HERRERA
6460 SW 114th St.
Pinecrest, FL 33156

COMPLAINT

1. Between December 2024 and July 2025, Isabela Herrera, the 25-year-old daughter of billionaire banking magnate Julio Herrera Velutini, contributed \$3.5 million to MAGA Inc., a super PAC formed to advance President Donald Trump’s political goals. These contributions were part of an obvious attempt to curry favor with President Trump in an effort to secure leniency for Herrera’s father, Velutini, who had been charged in 2022 with participating in an illegal bribery scheme to help reelect Wanda Vázquez Garced, then the Governor of Puerto Rico. That effort appears to have succeeded: in July 2025, federal prosecutors agreed to a remarkably lenient plea deal in which Velutini and his codefendants each plead guilty to a single misdemeanor charge. Then, in January 2026, Trump pardoned Velutini and his codefendants, erasing their criminal convictions.
2. Circumstantial evidence raises serious question as to whether Isabela Herrera used her own money to contribute \$3.5 million to Trump’s super PAC, which appears to have been the price for her father’s freedom. Specifically, the timing and circumstances surrounding the contributions, and the fact that Herrera appears to lack the financial means or any demonstrated interest in electoral politics to suddenly contribute millions of

dollars to a super PAC, provide reason to believe that Herrera was not the true contributor, and that the money instead was provided by her billionaire father, whose freedom appeared to hinge on the contributions—but who, as a foreign national, could not legally make the contributions himself. Viewed together, these facts and circumstances support finding reason to believe that Velutini contributed \$3.5 million in Herrera’s name to conceal the fact that he, not Herrera, was the unlawful true source of the money.

3. The circumstances of this corrupt bargain are consistent with several recent instances in which ultrawealthy individuals have contributed large sums of money to Trump’s network of political organizations—including MAGA, Inc.—to receive specific benefits, including dropped federal investigations and prosecutions, the commutation of criminal sentences, and pardons.¹ Yet this transaction stands apart due to the apparent unlawful use of a straw donor to conceal the true provenance of the contributions, which appears to be a foreign national source, another apparent violation of federal law.
4. Accordingly, there is reason to believe Velutini made, and Herrera knowingly permitted her name to be used to make, foreign national contributions in the name of another, in violation of the Federal Election Campaign Act (“FECA”).
5. This complaint is filed pursuant to 52 U.S.C. § 30109(a)(1) and is based on information and belief that Velutini and Herrera violated FECA, 52 U.S.C. § 30101, *et seq.*²

¹ See Campaign Legal Center, *Trump’s Corrupt Transactions* at 13–18 (last updated Nov. 20, 2025), https://campaignlegal.org/sites/default/files/2025-11/CLC_Corruption_Tracker_Nov20.pdf.

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

FACTUAL BACKGROUND

6. In August 2022, the Department of Justice charged former Puerto Rican Governor Wanda Vázquez Garced, Julio Herrera Velutini, and former FBI agent Mark Rossini with engaging in a conspiracy to violate federal bribery laws.³ These charges stemmed from a scheme in which Velutini pledged to provide \$300,000 to a super PAC supporting Garced’s 2020 gubernatorial reelection campaign, in exchange for Garced agreeing to replace Puerto Rico’s top banking regulator, who had led efforts to scrutinize a Velutini-owned bank, Bancrédito.
7. MAGA, Inc. is a “hybrid” political committee that registered with the Commission on November 7, 2024.⁴ Like all hybrid PACs, MAGA Inc. maintains a non-contribution account that functions like an independent-expenditure-only political committee (“IEOPC”), more commonly known as a super PAC—*i.e.*, it can raise and spend unlimited sums of money, including corporate funds, provided it not coordinate that spending with a candidate’s campaign or political party committee.
8. Isabela Herrera is Velutini’s daughter.⁵ According to publicly available voter registration records, Herrera is 25 years old.⁶
9. On December 31, 2024—several weeks after Donald Trump had already won the 2024 presidential election—Velutini’s daughter, Isabela Herrera, purported to contribute

³ Indictment, *United States v. Vazquez-Garced, et al.*, Crim. No. 22-342 (ADC) (Aug. 3, 2022), https://media.telemundopr.com/2022/08/Indictment-22-342-ADC_Redacted.pdf.

⁴ MAGA Inc., Statement of Org. at 1 (Nov. 7, 2024), <https://docquery.fec.gov/pdf/728/202411079719934728/202411079719934728.pdf>.

⁵ *See, e.g.*, Kenneth P. Vogel and Suzanne Craig, *Trump Sets Fraudster Free From Prison for a Second Time*, N.Y. Times (Jan. 16, 2026), <https://www.nytimes.com/2026/01/16/us/politics/trump-fraudster-pardon.html> (identifying Herrera as Velutini’s daughter).

⁶ Florida voter registration records linked to Herrera’s address in Pinecrest, FL, as reported in connection with her \$2.5 million contribution to MAGA Inc. in December 2024, identify that Herrera is 25 years old. *See Voter Information: Isabela Herrera*, VoteRef, <https://voteref.com/VoterDetails?personId=a489557a-018b-4988-a7a2-75fd60f10111&state=FL&archiveDates=> (last visited Feb. 5, 2026).

\$2.5 million to Trump’s super PAC, MAGA Inc.⁷ The address that MAGA Inc. reported in connection with this contribution matches the address provided on Herrera’s voter registration record.⁸

10. On July 8, 2025, several months after Trump took office, the Department of Justice entered into an agreement with Velutini and his codefendants pursuant to which they each plead to a single misdemeanor criminal charge of violating FECA’s ban on foreign-national contributions, 52 U.S.C. § 30121, with the government dismissing all other charges. Per his allocution, Velutini admitted to participating in a criminal scheme to violate the federal campaign finance laws that prohibit foreign nationals from making, or pledging to make, contributions.⁹ The presiding federal judge characterized this plea deal as a “decision to shift gears at the eleventh hour” that amounted to “a mere slap on the wrist” compared to the potential charges and penalties Velutini and his codefendants had been facing.¹⁰ The deal was nevertheless entered in late August 2025.
11. Herrera purported to contribute another \$1 million to MAGA Inc. on July 22, 2025.¹¹ The address reported to MAGA Inc. in connection with this contribution is located in New York City.¹²

⁷ MAGA Inc., 2024 Year-End Report at 8 (Jan. 31, 2025), <https://docquery.fec.gov/cgi-bin/fecimg/?202501319752674491>.

⁸ *Id.*

⁹ Plea Agreement, *United States v. Herrera-Velutini, et al.*, (Aug. 27, 2025), <https://www.courtlistener.com/docket/70702689/10/united-states-v-herrera-velutini/> (“Herrera-Velutini was aware that foreign nationals could not contribute money or other things of value, but acted knowingly and willfully in promising to contribute to the Vazquez campaign.”).

¹⁰ *United States v. Vazquez-Garced, et al.*, Crim. No. 22-342 (SCC), https://www.bloomberglaw.com/public/desktop/document/USAvVazquezGarcedetalDocketNo322cr00342DPRAug032022CourtDocket/6?doc_id=X611PDIOJ3L9BSO74N01LQ5S7CP.

¹¹ MAGA Inc., Amend. 30-Day Post-Special Election Report at 25 (Jan. 2, 2026), <https://docquery.fec.gov/cgi-bin/fecimg/?202601029793901866>.

¹² *Id.*

12. On January 15, 2026, Trump pardoned Velutini, effectively erasing his criminal conviction.¹³
13. On each of the two MAGA Inc. disclosure reports that report a contribution from Herrera, she self-reported having no employer—both reports indicate she is “Self-Employed”—and works as a “Financial Consultant” or “Finance Consultant.”¹⁴
14. Herrera does not appear to own either of the properties she identified as her personal residence: according to publicly available mortgage records and real estate listing information, the two residential addresses that Herrera reported in connection with the respective contributions correspond to properties owned by others, not Herrera.
15. FEC records indicate that, prior to the \$3.5 million in contributions to MAGA, Inc., Herrera’s only prior federal contribution was \$20 to Pete Buttigieg’s 2020 presidential campaign (when Buttigieg was vying for an opportunity to run against Trump).¹⁵

SUMMARY OF THE LAW

16. Under FECA, if the Commission receives a complaint and determines that there is “reason to believe that a person has committed . . . a violation” of the Act, the

¹³ Executive Grant of Clemency in *United States v. Vazquez-Garced, et al.*, 3:22-CR-342, President Donald J. Trump (Jan. 15, 2026), <https://www.justice.gov/pardon/media/1424211/dl?inline> (“Pardon”).

¹⁴ Circumstantial information indicates that Herrera was previously employed by PricewaterhouseCoopers (PWC) as an intern and then in an entry-level position, and that she also serves in some capacity as a board member for several of her family’s businesses, although it is not clear whether and to what extent she was compensated for any of these positions. See Banvelca Finance Group, Ltd., <https://find-and-update.company-information.service.gov.uk/company/13450629/officers> (attached as Ex. 1); House of Herrera, <https://find-and-update.company-information.service.gov.uk/company/14354292/officers> (attached as Ex. 2); Cibanca Finance Group, Ltd., <https://find-and-update.company-information.service.gov.uk/company/11931699/officers> (attached as Ex. 3); Emirates Financial Group, Ltd., <https://find-and-update.company-information.service.gov.uk/company/13134275/officers> (attached as Ex. 4); Britannia Financial Group Ltd., <https://find-and-update.company-information.service.gov.uk/company/10417641/officers> (attached as Ex. 5); see also Isabela H., LinkedIn, <https://www.linkedin.com/in/isabelaherrera/> (last visited Feb. 5, 2026).

¹⁵ Contributions from “Isabela Herrera,” https://www.fec.gov/data/receipts/?data_type=processed&contributor_name=Isabela+Herrera (last viewed Feb. 2, 2026).

Commission “shall make an investigation of such alleged violation.”¹⁶ The reason-to-believe finding is a threshold determination and “does not establish that the law has been violated.”¹⁷ The Commission uses the ensuing investigation “to determine whether a violation in fact occurred and, if so, its exact scope.”¹⁸ Accordingly, the Commission will find reason to believe when the “available evidence” is “sufficient to warrant conducting an investigation, and where the seriousness of the alleged violation warrants” further action.¹⁹

Foreign National Prohibition

17. FECA prohibits a foreign national from directly or indirectly making a contribution or donation, or making an express or implied promise to make a contribution or donation, in connection with a Federal, State, or local election.²⁰ All other persons are likewise prohibited from soliciting, accepting, or receiving a contribution or donation from a foreign national.²¹
18. The purpose of the foreign-national prohibitions is to “protect the United States electoral system from illegal foreign financial influence” and “any effort by foreign nationals to influence federal, State, or local elections with foreign money.”²²

¹⁶ 52 U.S.C. § 30109(a)(2); *see* 11 C.F.R. § 111.10(a).

¹⁷ Statement of Policy Regarding Commission Action in Matters at the Initial Stage in the Enforcement Process, 89 Fed. Reg. 19,729, 19,730 (Mar. 20, 2024), https://www.fec.gov/resources/cms-content/documents/fedreg_notice_2024-08.pdf (“RTB Standard”).

¹⁸ *Id.*

¹⁹ *Id.*

²⁰ 52 U.S.C. § 30121(a)(1). Federal law defines a “foreign national” as (1) “an individual who is not a citizen of the United States or a national of the United States,” and “who is not lawfully admitted for permanent residence;” and (2) a “foreign principal,” such as a foreign government or an entity organized in a foreign country “or having its principal place of business in a foreign country.” *Id.* § 30121(b).

²¹ *Id.* § 30121(a)(2).

²² Indictment, *United States v. Parnas*, 19-cr-725 (S.D.N.Y. Sept. 17, 2020), <https://www.justice.gov/usao-sdny/press-release/file/1317711/dl>.

19. The Supreme Court has upheld the ban on foreign nationals making contributions and donations in connection with elections, affirming a three-judge district court's ruling that the government may constitutionally "exclude foreign citizens from activities that are part of democratic self-government in the United States" in an effort to "prevent foreign influence over the U.S. political process."²³ That lower court remarked that foreign nationals "have primary loyalty to other national political communities, many of which have interests that compete with those of the United States."²⁴

Straw Donor Prohibition

20. 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."²⁵
21. The Commission regulation implementing the statutory prohibition provides the following examples of contributions in the name of another:
- a. "Giving money or anything of value, all or part of which was provided to the contributor by another person (the true contributor) without disclosing the source of money or the thing of value to the recipient candidate or committee at the time the contribution is made."
 - b. "Making a contribution of money or anything of value and attributing as the source of the money or thing of value another person when in fact the contributor is the source."²⁶

²³ *Bluman v. FEC*, 800 F. Supp. 2d 281, 283, 288 (D.D.C. 2011).

²⁴ *Id.* at 291.

²⁵ 52 U.S.C. § 30122.

²⁶ 11 C.F.R. § 110.4(b)(2)(i)-(ii).

22. 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,²⁷ and ensures that the public and regulators are fully informed about the true sources of political contributions and expenditures. Such transparency also enables voters, including complainant Wieand, to have the information necessary to evaluate candidates for office, “make informed decisions[,] and give proper weight to different speakers and messages.”²⁸
23. 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.²⁹ Moreover, the “key issue . . . is the source of the funds” and, therefore, the legal status of the funds when conveyed from a conduit to the ultimate recipient is “irrelevant to a determination of who ‘made’ the contribution for the purposes of [Section 30122].”³⁰

²⁷ *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).

²⁸ *Citizens United v. FEC*, 558 U.S. 310, 369–71 (2010).

²⁹ 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.”).

³⁰ *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).

24. Straw donor contributions like those alleged here are serious violations of federal campaign finance law that have led to criminal indictments and convictions.³¹ 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.³² Another indictment highlighted how straw donor schemes have been used to skirt FECA's source prohibitions, such as the ban on contributions by government contractors³³ or foreign nationals.
25. 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.

³¹ 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>.

³² 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>.

³³ 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:

JULIO HERRERA VELUTINI APPEARS TO HAVE MADE, AND ISABELA HERRERA APPEARS TO HAVE KNOWINGLY PERMITTED HER NAME TO BE USED TO MAKE, PROHIBITED CONTRIBUTIONS IN THE NAME OF ANOTHER, IN VIOLATION OF 52 U.S.C. §§ 30121 AND 30122

26. The available information supports finding reason to believe that Julio Herrera Velutini made, and his daughter Isabela Herrera knowingly permitted her name to be used to make, prohibited foreign contributions in the name of another totaling \$3.5 million.³⁴ Viewed in the overall context in which these contributions were made—namely, a transparent plan to supply funds to a super PAC advancing President Donald Trump’s political goals in exchange for favorable treatment for Velutini in connection with the federal criminal charges against him—there is a reasonable basis to conclude that Velutini, not Herrera, was the true contributor, and that the \$3.5 million was funneled through Herrera because Velutini, a foreign national, is legally prohibited from making contributions or donations in connection with federal, state, or local elections.
27. Indeed, Velutini was previously implicated in a similar scheme to violate federal campaign finance laws as part of a corrupt, quid pro quo bargain: he was criminally charged with, and admitted to, pledging to illegally provide \$300,000 to a super PAC supporting the reelection campaign of Puerto Rico’s then-Governor, Wanda Vázquez Garced, in exchange for Garced pledging to remove a top banking regulator scrutinizing one of Velutini’s banks.³⁵

³⁴ See 52 U.S.C. §§ 30121, 30122; RTB Standard, *supra* note 17 (“A ‘reason to believe’ finding followed by an investigation would be appropriate when a complaint credibly alleges that a significant violation may have occurred, but further investigation is required to determine whether a violation in fact occurred and, if so, its exact scope.”).

³⁵ See Indictment, *supra* note 3; Plea Agreement, *supra* note 9.

28. Additionally, making large donations to Trump’s political network, which includes MAGA Inc. as his primary super PAC, has become a well-documented tactic for those seeking to obtain benefits, including favorable treatment by others facing civil and criminal enforcement for illegal activity, from the Trump administration. As publicly documented, Trump has granted several pardons and commutations, and federal law enforcement and regulatory agencies, including the Department of Justice and the Securities and Exchange Commission (SEC), have dropped prosecutions and investigations, for those willing to supply funds to Trump-connected entities.³⁶ There is, thus, reason to believe that Velutini, facing substantial criminal liability and having previously attempted to engage in a similar corrupt, quid pro quo bargain, would seek to use his substantial financial resources to buy his way out of criminal jeopardy by making donations to Trump-connected organizations and entities.
29. For her part, Herrera appears to have lacked both the financial means and demonstrated interest in financially influencing electoral politics to make \$3.5 million in contributions to MAGA Inc. without receiving funding and instructions to do so from someone else—which is precisely what FECA prohibits. There is ample reason to believe that Herrera, a 25-year-old, self-employed financial consultant living in a rented residence, whose only previous federal contribution was a \$20 donation in 2020—to Pete Buttigieg, a Democratic candidate then running in a presidential primary election to oppose incumbent President Trump—did not suddenly and independently decided to contribute \$3.5 million to Donald Trump’s primary super PAC, and procured the means to do so from her own personal funds.³⁷

³⁶ Campaign Legal Center, *Trump’s Corrupt Transactions* at 13–18, *supra* note 1.

³⁷ See *supra* notes 14–15 and related text.

30. Instead, there is reason to believe that Velutini provided the funds to Herrera and directed her to contribute them to Trump’s super PAC, in an effort to elicit leniency and clemency from Trump’s administration. This type of corrupt bargain was, as noted above, not only consistent with Velutini’s own prior behavior—*i.e.*, pledging to make a \$300,000 super PAC contribution in return for Garced’s pledge to remove a regulator investigating one of Velutini’s banks—but also with established practice in Trump’s administration, which has openly transacted to provide pardons, commutations, and prosecutorial abdication in return for donations to his political organizations.
31. The fact that Velutini cannot legally make contributions in his own name because he is a foreign national provides further reason to believe that Herrera was merely a straw donor, not the true contributor. Herrera appears to have served merely as her father Velutini’s instrument to transact with Trump’s administration to procure a lenient plea agreement, and then a pardon, without again running afoul of the same FECA prohibition that initially landed Velutini in federal court.
32. The facts and circumstances surrounding these contributions are plainly “at least sufficient to warrant conducting an investigation,” particularly since “the seriousness of the alleged violation[s] warrants” such action.³⁸ It is incumbent upon the Commission to investigate whether Herrera was, in fact, the true contributor—a limited and narrow question that can easily be answered with documentary evidence—and ultimately, to determine whether Velutini unlawfully injected \$3.5 million in illegal foreign money into our electoral process.

³⁸ RTB Policy, *supra* note 17.

33. Accordingly, the Commission should find reason to believe Velutini and Herrera have violated the provisions in FECA that prohibit contributions in the name of another, and which further prohibit foreign nationals from making contributions in connection with a federal, state, or local election.³⁹

³⁹ See 52 U.S.C. §§ 30121, 30122.

PRAYER FOR RELIEF

34. Wherefore, the Commission should find reason to believe that Julio Herrera Velutini and Isabela Herrera have violated 52 U.S.C. § 30101 *et seq.*, and conduct an immediate investigation under 52 U.S.C. § 30109(a)(2).
35. Further, the Commission should seek appropriate sanctions for any and all violations, including civil penalties sufficient to deter future violations and an injunction prohibiting the respondents from any and all violations in the future, and should seek such additional remedies as are necessary and appropriate to ensure compliance with FECA.

Respectfully submitted,

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February 17, 2026

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

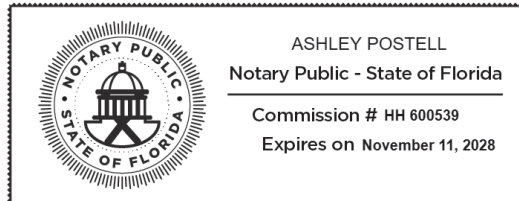

Roger G. Wieand

Florida Duval

Sworn to and subscribed before me this 11 day of February 202~~6~~. Roger G Wieand

Driver License used for ID.


Ashley Postell
Notary Public



Notarized remotely online using communication technology via Proof.

VERIFICATION

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

Sworn pursuant to 18 U.S.C. § 1001.

For Complainant Campaign Legal Center

Saurav Ghosh

Saurav Ghosh, Esq.

Commonwealth of Virginia, County of Prince William

Sworn to and subscribed before me this 17th day of February 2026.

[Signature]

Electronic Notary Public

Notary Public



Notarized remotely online using communication technology via Proof.