

BEFORE THE FEDERAL ELECTION COMMISSION

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

v.

MUR No. _____

AMERICAN MISSION and
BRITNEY GONZALEZ in her
official capacity as treasurer
1540 W Sunset Road, Suite 100, PMB 2001
Henderson, NV 89014

THINK BIG and JOSH VLASTO
in his official capacity as treasurer
3495 Lakeside Drive, #1209
Reno, NV 89509

COMPLAINT

1. A handful of ultrawealthy tech investors have spent over \$125 million funding a network of political groups dedicated to electing a slate of 2026 federal candidates opposed to regulating the artificial intelligence (“AI”) industry—including by spending over \$2.4 million on ads attacking Alex Bores, a congressional candidate who is an outspoken proponent of AI regulation.¹ Two of the super PACs involved in this network, “American Mission” and “Think Big,” have been unlawfully concealing who is actually being paid the vast sums of money they are spending to influence the midterm elections. Federal campaign finance law requires that political committees, including super PACs, disclose the recipients of their expenditures, yet American Mission and Think Big are flouting this requirement by routing virtually all of their payments through shell companies—blatantly undermining electoral transparency.

¹ See Shane Goldmacher & Nicholas Fandos, *A Midterm Clash of A.I. Giants Escalates as a Tech Billionaire Jumps In*, N.Y. Times (May 1, 2026), <https://www.nytimes.com/2026/05/01/us/politics/alex-bores-chris-larsen-open-ai-jack-schlossberg.html> (“Alex Bores, a state assemblyman who co-wrote A.I. regulation legislation adopted in New York . . . has been targeted by an industry-aligned super PAC that is trying to make an example of him.”).

2. Think Big has spent \$6,715,802 backing Silicon Valley’s favored Democratic primary candidates. It reported paying 96.8% of its disbursements (\$6,499,447) to a newly formed company called “Lantern Production Consultants LLC.” Similarly, American Mission has spent \$4,366,188 supporting “pro-AI” Republican candidates, with 94.4% of its disbursements (\$4,152,882) going to a newly formed entity called “Summit Ridge Media Group LLC.” Both LLCs were formed on the exact same day—October 30, 2025—and both identify their addresses as mail centers in Nevada. Neither LLC has a website or other digital footprint, nor do they appear to have other clients, despite being reported by Think Big and American Mission, respectively, as the payees for a full suite of consulting and advertising services.
3. The overall record therefore indicates that these LLCs are not bona fide commercial vendors that provided the services attributed to them by Think Big and American Mission, but rather serve as payment clearinghouses for the super PACs to illegally conceal the true recipients of over \$10.5 million in super PAC payments—a figure all but certain to continue growing as the super PACs continue spending on the 2026 elections. Because the record suggests that these LLCs do not have an arm’s length relationship with American Mission and Think Big, and instead function as mere extensions of the super PACs they service, the super PACs are legally obligated to report the ultimate recipients of their payments—*i.e.*, the vendors who are actually performing the services identified in the super PACs’ reports. Because they have evaded these vital reporting obligations, there is reason to believe both American Mission and Think Big have violated the Federal Election Campaign Act (“FECA” or the “Act”).

4. This complaint is filed pursuant to 52 U.S.C. § 30109(a)(1) and is based on information and belief that Think Big and Josh Vlasto in his official capacity as Think Big’s treasurer and American Mission and Britney Gonzalez in her official capacity as American Mission’s treasurer have violated FECA, 52 U.S.C. § 30101, *et seq.*²

FACTS

5. A small group of some of the wealthiest AI investors in the world, who appear to be pushing for the rapid expansion of AI technology, have reportedly banded together to fund a network of political groups committed to electing candidates who want to keep AI largely unregulated, which has been dubbed the “Leading the Future” network.³
6. Spearheading this effort is the Leading the Future super PAC (“LTF PAC”), which was formed on August 15, 2025,⁴ “to reshape Congress to be more supportive of major [AI] industry players such as OpenAI.”⁵ LTF PAC has publicly advocated in favor of the rapid acceleration of AI technology and supports “pro-AI” candidates on both sides of the political aisle.⁶
7. LTF PAC is almost entirely funded by a small handful of tech magnates heavily invested in AI: Marc Andreessen (\$25 million) and Benjamin Horowitz (\$25 million), the co-owners of a Silicon Valley venture capital firm, as well as their eponymous venture

² See 52 U.S.C. § 30109(a)(2); see also 11 C.F.R. § 111.4(a).

³ See Ally Mutnick, *Pro-AI Network to Spend \$5M in Texas GOP Primaries*, PunchBowl News (Feb. 23, 2026), <https://punchbowl.news/article/campaigns/ai-network-texas/> (referring to Leading the Future as “a super PAC network backed by AI industry executives”).

⁴ Leading the Future, Statement of Org. at 1 (Aug. 15, 2025), <https://docquery.fec.gov/pdf/962/202508159789478962/202508159789478962.pdf>.

⁵ See Nitasha Tiku, *et al.*, *Super PAC Aims to Drown Out AI Critics in Midterms, with \$100M and Counting*, Wash. Post (Aug. 26, 2025), <https://www.washingtonpost.com/technology/2025/08/26/silicon-valley-ai-super-pac/>.

⁶ See *id.*; Leading the Future, <https://www.leadingthefuture.com/> (last visited Apr. 29, 2026); see also Matt Dixon, *‘Slap in the Face’: White House Irked by a New \$100M Pro-AI Super PAC*, NBC News (Oct. 24, 2025), <https://www.nbcnews.com/politics/trump-administration/white-house-irked-leading-future-new-100m-ai-super-pac-rcna239392> (“In August, the group of donors launched a super PAC called Leading the Future[, which] . . . plans to back AI-friendly candidates from both political parties.”).

capital firm, Andreessen Horowitz / a16Z Capital Management LLC (\$50 million); Greg Brockman, the president of OpenAI (\$12.5 million), and his wife Anna Brockman (\$12.5 million); and Perplexity, an AI platform (\$100,000).⁷

8. LTF PAC also has an affiliated 501(c)(4) dark money group, Build American AI, which is reportedly spending vast, undisclosed sums aimed at shaping a broader narrative supporting the American AI industry—including by not adopting regulatory guardrails—in advance of the 2026 midterm elections.⁸
9. LTF PAC has not reported making any independent expenditures (“IEs”), *i.e.*, payments for communications not coordinated with a candidate’s campaign or political party committee, which expressly advocate the election or defeat of a clearly identified federal candidate.⁹ It has instead transferred \$10 million to each of two other super PACs in the Leading the Future network, American Mission and Think Big, which, in turn, spend money to pay for election-influencing ads.¹⁰ According to their respective websites,

⁷ *Individual Contributions: Leading the Future*, FEC, https://www.fec.gov/data/individual-contributions/?committee_id=C00916114&two_year_transaction_period=2026 (last visited Apr. 29, 2026); *see also* Jessica Piper, *Meet the New Power Players Raising Massive Money for the Midterms*, Politico (Apr. 17, 2026), <https://www.politico.com/news/2026/04/17/ai-crypto-new-campaign-finance-players-00878049>; Tiku, *supra* note 5.

⁸ *See* Taylor Lorenz, *A Dark-Money Campaign Is Paying Influencers to Frame Chinese AI as a Threat*, Wired (May 1, 2026), <https://www.wired.com/story/super-pac-backed-by-openai-and-palantir-is-paying-tiktok-influencers-to-fear-monger-about-china/> (reporting that Build American AI is funding “a coordinated influence campaign” that is initially “focused on working with lifestyle influencers . . . to promote the US artificial intelligence industry and American innovation”); Aaron Mak, *How to Pitch Voters on the AI Apocalypse*, Politico (Jan. 14, 2026), <https://www.politico.com/newsletters/digital-future-daily/2026/01/14/washington-ponders-how-to-pitch-voters-on-the-ai-apocalypse-00729258> (“AI boosters may face a similar strategic question going into the midterms as they push for fewer regulations so developers can improve AI systems more quickly. Nathan Leamer, who directs the political advocacy group Build American AI, says . . . he thinks messaging will be more effective if it emphasizes how AI can revive industrialization and manufacturing in America, or enable tools that help consumers.”); *see also* Alex Isenstadt, *AI Industry-Backed Group to Spend Millions Pushing Regulation Agenda*, Axios (Oct. 29, 2025), <https://www.axios.com/2025/10/29/ai-new-advocacy-group-dark-money>.

⁹ *Spending: Leading the Future*, FEC, <https://www.fec.gov/data/committee/C00916114/?tab=spending> (last visited Apr. 29, 2026); *see* 52 U.S.C. § 30101(17); 11 C.F.R. § 100.16.

¹⁰ *See Disbursements: Leading the Future (Filter for “Contributions”)*, FEC, https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00916114&two_year_transaction_period=2026&disbursement_description=contribution (last visited Apr. 29, 2026); *Spending: American Mission*, FEC, <https://www.fec.gov/data/committee/C00916692/?tab=spending> (last visited Apr. 29, 2026); *Spending: Think Big*, FEC, <https://www.fec.gov/data/committee/C00923417/?tab=spending> (last visited Apr. 29, 2026).

which offer virtually identical mission statements, American Mission was formed to exclusively support pro-AI Republican candidates, and Think Big was formed to exclusively support pro-AI Democratic candidates.¹¹

American Mission and Summit Ridge Media Group LLC

10. American Mission registered with the Commission as a super PAC on August 20, 2025.¹² In addition to the \$10 million it reported receiving from LTF PAC, American Mission has also reported receiving \$250,000 from Lonsdale Enterprises, Inc., which appears to be a corporate entity controlled by Palantir co-founder Joe Lonsdale.¹³ American Mission has reported spending \$243,185 on operating expenditures and \$4,123,003 on IEs, for a total of \$4,366,188.¹⁴ Of that amount, American Mission paid \$4,123,003, or 94.4% of its total spending, to Summit Ridge Media Group LLC (“Summit LLC”).¹⁵ Summit LLC is also the only vendor American Mission has paid for IEs.¹⁶

¹¹ See American Mission, <https://www.americanmission.com/> (attached as Ex. A) (“American Mission backs Republican candidates who champion a pro-innovation, pro-AI vision that ensures America remains the global leader in artificial intelligence — and opposes those who do not.”); Think Big, <https://thinkbigpac.ai/> (attached as Ex. B) (“Think Big’s mission is to back Democratic candidates who champion a pro-innovation, pro-AI vision that ensures America remains the global leader in artificial intelligence — and to oppose those who do not.”).

¹² American Mission, Statement of Org. at 1 (Aug. 20, 2025), <https://docquery.fec.gov/pdf/162/202508209789624162/202508209789624162.pdf>.

¹³ American Mission, 2025 Year-End Report at 6 (Jan. 30, 2026), <https://docquery.fec.gov/cgi-bin/fecimg/?202601309794868429>; see Kevin Breuninger, *Elon Musk Plans to Give \$45 Million a Month to Pro-Trump Super PAC*, *WSJ Reports*, CNBC (Jun. 19, 2024), <https://www.cnbc.com/2024/07/15/elon-musk-plans-to-give-45-million-a-month-to-pro-trump-super-pac-wsj-reports.html> (“Palantir co-founder Joe Lonsdale . . . donated \$1 million to America PAC through Lonsdale Enterprises, an entity linked to the eponymous tech investor, multiple outlets reported.”).

¹⁴ American Mission, 2026 April Monthly Report at 4 (Apr. 20, 2026), <https://docquery.fec.gov/pdf/581/202604209863244581/202604209863244581.pdf>; American Mission, 2025 Year-End Report at 4 (Jan. 30, 2026), <https://docquery.fec.gov/pdf/424/202601309794868424/202601309794868424.pdf>; *Independent Expenditures (24/48-Hour Reports): American Mission*, FEC, https://www.fec.gov/data/independent-expenditures/?data_type=processed&q_spender=C00916692&is_notice=true&most_recent=true&min_date=01%2F01%2F2025&max_date=12%2F31%2F2026 (last visited Apr. 30, 2026).

¹⁵ See *Disbursements: American Mission (Filter: “Summit”)*, FEC, https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00916692&recipient_name=summit&two_year_transaction_period=2026 (last visited Apr. 30, 2026); American Mission IEs, *supra* note 14; American Mission, 2026 April Monthly Report at 10 (April Monthly data is not yet incorporated into the disbursement search).

¹⁶ See American Mission IEs, *supra* note 14.

11. Summit LLC was registered in Delaware on October 30, 2025—*i.e.*, about two months after American Mission was formed in August 2025, and just over a month before the super PAC began making IEs in December 2025.¹⁷ Summit LLC’s reported address, per American Mission’s FEC filings, is 5150 Mae Anne Ave., Suite 405, PMB 1141, Reno, NV 89523¹⁸—an address that corresponds to the “Ridgeview Mail Center.”¹⁹
12. As demonstrated in the attached table, American Mission has paid Summit LLC for a wide variety of distinct services, including media production and placement for both television and digital ads, text messages, consulting, website services, and banking fees.²⁰ American Mission has not itemized any payments to sub-vendors of Summit LLC.²¹
13. No other federal political committee has reported making any disbursements to Summit LLC.²² A search of the public record indicates that the only non-federal committee paying Summit LLC is American Mission Florida, a Florida state PAC “funded entirely by Leading the Future,” which has supported Republican candidate Rep. Byron Donalds in the 2026 Florida gubernatorial election.²³ Like American Mission, American Mission

¹⁷ *Entity Details: Summit Ridge Media Group LLC*, Del. Div. of Corps., <https://icis.corp.delaware.gov/ecorp/entitysearch/NameSearch.aspx> (attached as Ex. C).

¹⁸ *See, e.g.*, American Mission, 2026 April Monthly Report at 10.

¹⁹ Ridgeview Mail Center, <https://www.ridgeviewmailcenter.com/> (last visited Apr. 30, 2026).

²⁰ *See* Appendix A.

²¹ *See generally* *Committee Filings: American Mission*, FEC, <https://www.fec.gov/data/committee/C00916692/?tab=filings> (last visited Apr. 30, 2026).

²² *See Disbursements (Filter: Summit Ridge Media)*, FEC, https://www.fec.gov/data/disbursements/?data_type=processed&recipient_name=summit+ridge+media&max_date=12%2F31%2F2026 (last visited Apr. 30, 2026).

²³ *See Search the Campaign Finance Database*, Fla. Div. of Elections, <https://dos.fl.gov/elections/candidates-committees/campaign-finance/campaign-finance-database/> (last visited Apr. 30, 2026) (searching for “American Mission Florida” shows Leading the Future as the PAC’s only contributor and Summit Ridge as its only vendor, apart from a bank) (attached as Ex. D); Jesse Scheckner, *Poll: Byron Donalds at 50% in GOP Governor’s Primary as Most Voters Support Federal AI Framework*, Fla. Politics (Apr. 11, 2026), <https://floridapolitics.com/archives/790089-poll-byron-donalds-at-50-in-gop-governors-primary-as-most-voters-support-federal-ai-framework/> (“Leading the Future, a federal super PAC[,] . . . has put a lot of resources into [Byron] Donalds’s campaign and messaging about artificial intelligence. . . . Regionally, [Donalds’s] gains were more pronounced, with a 14-point jump in the Tampa Bay media market and a 7-point increase in the Panhandle,

Florida has reportedly directed all of its spending to Summit LLC, aside from its payments to a bank.²⁴

14. Summit LLC does not appear to have any online presence outside of its name appearing in these campaign finance records and filings with the Delaware Secretary of State's office.

Think Big and Lantern Production Consultants LLC

15. Think Big registered with the FEC as a super PAC on October 15, 2025.²⁵ In addition to the \$10 million it reported receiving from LTF PAC, Think Big has also reported receiving \$500,000 from Ron Conway, a Silicon Valley venture capitalist.²⁶ According to its most recent reporting, it has spent \$1,727,741 on operating expenditures and \$4,988,061 on IEs, for a total of \$6,715,802.²⁷
16. Like American Mission, Think Big has paid virtually all of its money to a single vendor: Lantern Production Consultants LLC ("Lantern LLC"). Think Big has given Lantern LLC a total of \$6,499,447, which is 96.8% of its total spending and includes—just like American Mission—100% of its IE spending.²⁸

where American Mission Florida — a state-level political committee funded entirely by Leading the Future — has concentrated advertising.”).

²⁴ See Ex. D.

²⁵ Think Big, Statement of Org. (Oct. 15, 2025), <https://docquery.fec.gov/pdf/198/202510159791040198/202510159791040198.pdf>.

²⁶ Think Big, 2025 Year-End Report at 6 (Jan. 30, 2026), <https://docquery.fec.gov/cgi-bin/fecimg/?202601309794859766>.

²⁷ See Think Big, 2026 April Monthly Report at 4 (Apr. 20, 2026), <https://docquery.fec.gov/pdf/970/202604209863252970/202604209863252970.pdf>; Think Big, 2025 Year-End Report at 4 (Jan. 30, 2025), <https://docquery.fec.gov/pdf/761/202601309794859761/202601309794859761.pdf>; *Independent Expenditures (24/48-Hour Reports): Think Big*, FEC, https://www.fec.gov/data/independent-expenditures/?data_type=processed&q_spender=C00923417&is_notice=true&most_recent=true&min_date=01%2F01%2F2025&max_date=12%2F31%2F2026 (last visited Apr. 30, 2026).

²⁸ See Think Big, 2026 April Monthly Report at 7–9; *Disbursements: Think Big (Filter: Lantern)*, FEC, https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00923417&recipient_name=lantern (last visited Apr. 30, 2026); *Think Big IEs*, *supra* note 27.

17. Lantern LLC was formed in Delaware on October 30, 2025,²⁹ just two weeks after Think Big registered with the FEC and the same day Summit LLC was formed. Lantern LLC's address, according to Think Big's FEC filings, is 1344 Disc Drive #3038, Sparks, NV 89436,³⁰ which corresponds to a branch of the private mailbox rental service, "Postal Annex."³¹ Accordingly, Lantern LLC and Summit LLC share the same formation date and jurisdiction (Delaware), and both identify their official location as a mail center in Nevada.
18. Just like American Mission's payments to Summit LLC, Think Big paid Lantern LLC for a wide range of distinct services, which typically are not offered through the same vendor, especially a newly created company. As displayed in the attached table, Think Big's expenditures include payments for research, polling, digital advertising, television advertising, direct mail, texting, print advertising, media placement, multiple kinds of consulting, community media engagement, and payment processing fees.³² Think Big has not itemized payments to any sub-vendors working for Lantern LLC.³³
19. Think Big is the only federal political committee that has reported any expenditures to Lantern LLC,³⁴ and there is no evidence of any state or local committees paying Lantern

²⁹ *Entity Details: Lantern Production Consultants LLC*, Del. Div. of Corps., <https://icis.corp.delaware.gov/ecorp/entitysearch/NameSearch.aspx> (attached as Ex. E).

³⁰ *See, e.g.*, Think Big 2026 April Monthly Report at 7.

³¹ *See Private Mailboxes*, Postal Annex, <https://www.postalannex.com/mailbox-rental/copy-services/307> (last visited Apr. 30, 2026).

³² *See* Appendix B.

³³ *See generally Committee Filings: Think Big*, FEC, <https://www.fec.gov/data/committee/C00923417/?tab=filings> (last visited Apr. 30, 2026).

³⁴ *See Disbursements (Filter: Lantern Consultants)*, FEC, https://www.fec.gov/data/disbursements/?data_type=processed&recipient_name=lantern+consultants&max_date=12%2F31%2F2026 (last visited Apr. 30, 2026).

LLC. Like Summit LLC, Lantern LLC has no online presence outside of Think Big’s FEC filings and its registration with the Delaware Secretary of State’s office.

SUMMARY OF THE LAW

20. 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 Commission “shall make an investigation of such alleged violation.”³⁵ The reason-to-believe finding is a threshold determination and “does not establish that the law has been violated.”³⁶ The Commission uses the ensuing investigation “to determine whether a violation in fact occurred and, if so, its exact scope.”³⁷ 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.³⁸

Disbursement Reporting

21. FECA requires each treasurer of a political committee to file regular reports of receipts and disbursements with the Commission.³⁹ Each report must provide, *inter alia*, information regarding the name and address of each person to whom the committee makes a disbursement aggregating more than \$200 per calendar year, as well as the date, amount, and purpose of such payments.⁴⁰

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

³⁶ 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.

³⁷ *Id.*

³⁸ *Id.*

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

⁴⁰ 52 U.S.C. § 30104(b)(5)(a); 11 C.F.R. § 104.9(a)–(b).

22. A committee’s failure to itemize its disbursements leaves voters in the dark about the entities working for the committee, including the nature of and charges for the services provided, as well as the overall amount these entities are being paid—which denies voters their informational interest in knowing “where political campaign money comes from and how it is spent,”⁴¹ and undermines the bedrock transparency necessary for voters to meaningfully evaluate candidates and “make informed decisions.”⁴² Failure to completely and accurately report disbursements also undermines compliance with and enforcement of other laws that protect voters and our electoral system, such as the prohibition of coordination between campaigns and outside spending groups—*e.g.*, super PACs and “dark money” 501(c)(4) groups—through common vendors or former employees.⁴³

Reporting Sub-Vendors

23. In Advisory Opinion 1983-25 (Mondale), the Commission determined that a committee need not separately itemize its media vendor’s “payments to other persons, which are made to purchase services or products used in performance of [the vendor’s] contract with the Committee,” *i.e.*, sub-vendor payments.⁴⁴ The Commission’s conclusion turned on several factors about the relationship between the committee and the vendor, including that: (1) the vendor was “separate and distinct” from the committee and did not have overlapping staff; (2) the committee and vendor conducted “arms-length negotiations” for

⁴¹ *Buckley v. Valeo*, 424 U.S. 1, 66 (1976).

⁴² *Citizens United v. FEC*, 558 U.S. 310, 370 (2010).

⁴³ See 11 C.F.R. §§ 109.20, 109.21(d)(4), (5).

⁴⁴ Advisory Op. 1983-25 (Mondale) at 2, <https://www.fec.gov/files/legal/aos/1983-25/1983-25.pdf>.

the contract to provide services; and (3) the vendor would “not be required to devote its ‘full efforts’ to [the committee] and indeed expects to have other [clients].”⁴⁵

24. The Commission has clarified and cabined Advisory Opinion 1983-25 in subsequent enforcement matters, finding that a committee must itemize payments to a sub-vendor when the vendor does not have an “arm’s-length” relationship with the committee, when the payments to the sub-vendor are unrelated to the services provided pursuant to the vendor’s contract with the committee, and/or when the immediate vendor is merely acting as a “conduit” for disbursements to one or more sub-vendors.⁴⁶
25. In MUR 3874 (Stockman), the Commission found probable cause to believe that Friends of Steve Stockman violated 52 U.S.C. § 30104(b)(5)(a) by failing to itemize disbursements to sub-vendors paid through a vendor, Political Won Stop (“PWS”).⁴⁷ PWS was started by a Stockman campaign official and payments from the campaign to PWS were “used to pay, inter alia, . . . third-party vendors to carry out services for the campaign.”⁴⁸ The Commission concluded that the campaign and PWS did not have “sufficiently separate and distinct identities to warrant the less detailed type of reporting permitted by the Commission in Advisory Opinion 1983-25,”⁴⁹ particularly because the campaign and PWS were not “conducting their professional relationship at arm’s length,” since one of PWS’s two principals held a position with the campaign and publicly

⁴⁵ *Id.* at 3.

⁴⁶ *See infra* ¶¶ 25–27.

⁴⁷ Conciliation Agreement ¶ V.3, MUR 3874 (Stockman) (Jun. 2, 1998), <https://www.fec.gov/files/legal/murs/3847.pdf> (PDF p. 1583).

⁴⁸ Gen. Counsel’s Brief at 32–33, MUR 3847 (Stockman) (Sep. 15, 1997) (PDF pp. 1447-48).

⁴⁹ First Gen. Counsel’s Report at 4, MUR 3874 (Stockman) (Jul. 10, 1991) (PDF p. 654).

represented himself as a campaign official, and since PWS was devoted largely to the Stockman campaign, working out of its headquarters and using its facilities.⁵⁰

26. In MUR 4872 (Jenkins), the Commission conciliated knowing and willful violations of FECA’s itemized disbursement disclosure requirement.⁵¹ The violations resulted from a scheme in which candidate Louis E. “Woody” Jenkins and his campaign committee, Jenkins for Senate 1996, made payments through the campaign’s primary media vendor, Courtney Communications, to a different vendor, Impact Mail & Printing—which the campaign hired to perform computerized phone bank services—while disclosing only Courtney Communications as the recipient of these payments on its disclosure reports.⁵² Jenkins admitted that he directed the payments to Impact Mail be made through Courtney Communications to avoid public disclosure of his campaign’s association with Impact Mail, which was connected to the well-known white supremacist David Duke.⁵³ The Commission’s conciliation agreement also noted that “Impact Mail was not an ‘ultimate vendor’ or sub vendor of Courtney Communications” because “Courtney had no involvement whatsoever with the services provided by Impact Mail[,] . . . [and, indeed,] Courtney’s only role in this matter was to serve as a conduit for payment to Impact Mail so as to conceal the transaction with Impact Mail.”⁵⁴

⁵⁰ *See id.* at 5 (PDF p. 655); Gen. Counsel’s Brief at 34–35, MUR 3874 (Stockman) (PDF pp. 1449-50).

⁵¹ Conciliation Agreement ¶ V, MUR 4872 (Jenkins for Senate 1996, *et al.*) (Feb. 15, 2002), <https://www.fec.gov/files/legal/murs/4872/0000016F.pdf>.

⁵² *Id.* ¶¶ IV.4–IV.7.

⁵³ *Id.* ¶ IV.7 (“Jenkins acknowledges that Impact Mail provided the services to the Jenkins Committee . . . [and that] Jenkins decided to make disbursements for the services through Courtney Communications because he did not want his campaign to be associated with Impact Mail and did not want Impact Mail listed on the Jenkins Committee’s disclosure reports.”).

⁵⁴ *Id.* ¶ IV.9.

27. In MUR 6724 (Bachmann for President), the Commission found reason to believe that Michelle Bachmann’s campaign committee unlawfully failed to disclose payments to Iowa State Senator Kent Sorenson, ultimately conciliating the violations.⁵⁵ Sorenson and the campaign believed that state law prohibited Sorenson from accepting payments in exchange for supporting Bachmann, so the campaign routed the money through C&M Strategies, Inc. (“C&M”), one of its vendors, to conceal the transactions.⁵⁶ Finding that Sorenson “did not take direction from or perform any work for C&M,” and C&M did not exercise any control over the funds that were earmarked for Sorenson, the Commission concluded that Sorenson could not be classified as C&M’s sub-vendor.⁵⁷ Therefore, Sorenson should have been disclosed as the ultimate payee.⁵⁸ The Office of General Counsel also noted in its analysis that: (1) C&M’s only principal held an official position with the campaign and worked out of the campaign headquarters; (2) C&M dedicated all its resources to Bachmann’s campaign and leadership committee; and (3) given those factors, there did not appear to be an arm’s length relationship between the campaign and C&M—meaning that C&M was not the ultimate payee under the Mondale factors.⁵⁹

⁵⁵ See Conciliation Agreement ¶ V, MUR 6724 (Bachmann for President), <https://www.fec.gov/files/legal/murs/6724/17044423200.pdf> (July 27, 2017).

⁵⁶ *Id.* ¶ IV.3.

⁵⁷ *Id.* ¶¶ IV.4–IV.5.

⁵⁸ *Id.* ¶ V; see also Factual and Legal Analysis at 8–10, MUR 6800 (Ron Paul 2012 Presidential Campaign Comm., Inc.) (Jun. 30, 2016), https://www.fec.gov/files/legal/murs/6800/6800_18.pdf (finding reason to believe that Ron Paul’s presidential campaign committee knowingly and willfully violated 52 U.S.C. § 30104(b)(5)(a) by paying Iowa State Senator Kent Sorenson for his endorsement using a vendor as an intermediary to disguise the payments).

⁵⁹ See First Gen. Counsel’s Report at 14–16, MUR 6724 (Bachmann for President) (Aug. 26, 2014), <https://www.fec.gov/files/legal/murs/6724/17044423059.pdf>. Notwithstanding these precedents, three commissioners voted to dismiss a sub-vendor reporting complaint in MUR 7784, based, among other reasons, on the legally flawed view that sub-vendor reporting is required only where the “immediate recipient [of funds] is merely a conduit for the intended recipient of the funds.” Statement of Reasons of Chairman Allen J. Dickerson & Comm’rs Sean J. Cooksey & James E. “Trey” Trainor at 5, MUR 7784 (MAGA PAC) (Jun. 9, 2022), https://www.fec.gov/files/legal/murs/7784/7784_42.pdf (quoting MUR 6724 (Bachmann for President)). The three commissioners also errantly claimed that Campaign Legal Center’s pending rulemaking petition—which seeks to expand the sub-vendor reporting requirement to cover situations *not already covered* by the existing rule—indicated

CAUSE OF ACTION

COUNT I:

AMERICAN MISSION AND THINK BIG VIOLATED 52 U.S.C. § 30104(B)(5)(A) BY FAILING TO REPORT THE ULTIMATE PAYEES OF THEIR EXPENDITURES ATTRIBUTED TO SUMMIT RIDGE MEDIA GROUP LLC AND LANTERN PRODUCTION CONSULTANTS LLC

28. Applying the three factors that the Commission outlined in Advisory Opinion 1983-25 (Mondale) and explicated in subsequent matters, there is reason to believe American Mission and Think Big violated FECA by reporting payments to Summit LLC and Lantern LLC, respectively, without itemizing those entities' payments to sub-vendors, who were the ultimate recipients of the super PACs' funds. The LLCs were not "separate and distinct" entities operating at arm's length, and each LLC appears to have "devote[d] its 'full efforts' to" its sponsor super PAC.⁶⁰ Accordingly, there is reason to believe both super PACs violated FECA by failing to itemize sub-vendor payments made through these LLCs, as required.
29. The record is clear that Summit LLC is dedicating its full resources to American Mission/American Mission Florida, and Lantern LLC is doing the same for Think Big. The LLCs have no identifiable clients outside of these Leading the Future-financed PACs,⁶¹ and despite the broad swath of services attributed to them by the these PACs, the LLCs do not appear even to be looking to add more: The LLCs do not maintain websites or have any online presence,⁶² do not advertise their services, and provide no publicly

an "uncertain" "regulatory environment" regarding the reporting of ultimate payees. *See id.* at 12; *see also FEC Rulemaking Petition on Transparency for Political Spending*, CLC (Jun. 29, 2021), <https://campaignlegal.org/document/fec-rulemaking-petition-transparency-political-spending>. The Commission's dismissal of MUR 7784 is the subject of ongoing litigation. *See Campaign Legal Ctr. v. FEC*, No. 22-5339 (D.C. Cir.) (appeal filed Dec. 21, 2022).

⁶⁰ *See* Advisory Op. 1983-25 at 3.

⁶¹ *See supra* ¶¶ 13, 19.

⁶² *See supra* ¶¶ 14, 19.

available contact information.⁶³ Each LLC has and will almost certainly continue to “devote its ‘full efforts’ to” the super PAC it was apparently formed to service. As such, Summit LLC and Lantern LLC are fully dedicated to their respective super PACs, indicating that they are functioning as extensions of the super PACs rather than legitimate vendors seeking to draw clients from the public.

30. The sheer breadth of the services for which Summit LLC and Lantern LLC were paid further supports this conclusion. Summit LLC and Lantern LLC were paid for research, polling, website services, the creation and placement of ads for virtually every method of communication, and for multiple types of political consulting.⁶⁴ These are distinct and specialized services that are not typically performed by a single commercial vendor—let alone a new entity that is just weeks out from initially setting up shop and has a client base of one or two PACs. These facts suggest that, from their inception, Summit LLC and Lantern LLC were meant to be integrated parts of the Leading the Future network, acting as corporate middlemen between American Mission and Think Big and the vendors actually paid to provide the reported services.
31. For many of the same reasons, it does not appear that the super PACs and their respective LLCs have a business relationship negotiated at arm’s length. American Mission formed around the same time as Summit LLC and has given more than 94% of its disbursements—including 100% of its IEs spending—to Summit LLC.⁶⁵ Furthermore, Summit LLC does not appear to have any clients other than American Mission and its Florida offshoot.⁶⁶ Think Big and Lantern LLC adhere to the same pattern: Think Big

⁶³ See *supra* ¶¶ 14, 19.

⁶⁴ See *supra* ¶¶ 12, 18; see also Appendices A & B.

⁶⁵ See *supra* ¶¶ 10–11.

⁶⁶ See *supra* ¶ 13.

and Lantern LLC came into existence within two weeks of each other, and Think Big has given Lantern LLC almost 97% of its expenditures and is Lantern LLC's only client.⁶⁷

Because, in each case, it appears that the PAC and LLC were created at approximately the same time, and each vendor's sole purpose is servicing its respective PAC, the vendor and the PAC do not have an arm's length relationship; the entities are plainly too dependent on each other to negotiate the terms of their business relationship impartially.

32. There is ample evidence indicating that the LLCs and the super PACs are in fact all working to advance the overarching goals of the handful of ultrawealthy AI investors financing the Leading the Future network. While the public record does not reveal whether either Summit LLC or Lantern LLC has its own officers or employees, the marked similarities between the two entities provide strong circumstantial evidence that people associated with the Leading the Future network almost certainly had a hand in creating and operating them. Both entities registered as LLCs in Delaware on *the same day*—October 30, 2025, just 10 weeks after American Mission's formation, and a mere 15 days after Think Big's.⁶⁸ Neither appears to have a physical location; they both list Nevada mailing facilities as their point of contact.⁶⁹ Moreover, both LLCs exclusively provide services to Leading the Future-sponsored entities: Summit LLC only services American Mission and a Florida offshoot, American Mission Florida, and Lantern LLC only services Think Big.⁷⁰
33. The timing and sequence of these events, viewed alongside the LLCs' apparently narrow purpose—collecting and distributing each super PAC's spending to conceal the true

⁶⁷ See *supra* ¶¶ 15–17.

⁶⁸ See *supra* ¶¶ 10, 11, 15, 17.

⁶⁹ See *supra* ¶¶ 11, 17.

⁷⁰ See *supra* ¶¶ 13, 19.

recipients of that spending—provide reason to believe that the formation and use of the super PACs and the LLCs servicing them were likely all part of a plan carefully choreographed by the Leading the Future network.

34. Viewed as a whole, therefore, the available information supports finding reason to believe these super PACs and their respective LLCs do not have “sufficiently separate and distinct identities to warrant the less detailed type of reporting permitted by the Commission in Advisory Opinion 1983-25.”⁷¹ Indeed, there is reason to believe Summit LLC and Lantern LLC serve as mere payment clearinghouses for these super PACs to conceal the identities of the actual vendors who performed the services described in the super PACs’ disclosure reports. Voters have a right to know who these super PACs are actually paying to provide services; indeed, that information is essential for voters to cast informed ballots in the 2026 election.
35. Accordingly, there is reason to believe that American Mission and Think Big violated 52 U.S.C. § 30104(b)(5)(a) by failing to report the ultimate payees of their disbursements attributed to Summit LLC and Lantern LLC, thereby denying the public important information about how money is being spent to influence their votes.

⁷¹ First Gen. Counsel’s Report at 4, MUR 3874 (Stockman); *see also* MUR 6724 (Bachmann for President); MUR 6800 (Ron Paul 2012 Presidential Campaign Comm., Inc.).

PRAYER FOR RELIEF

36. Wherefore, the Commission should find reason to believe that American Mission and Think Big violated 52 U.S.C. § 30101 *et seq.*, and conduct an immediate investigation under 52 U.S.C. § 30109(a)(2).
37. 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
Campaign Legal Center, by
Saurav Ghosh, Esq.
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Saurav Ghosh, Esq.
Campaign Legal Center
1101 14th Street NW, Suite 400
Washington, DC 20005
Counsel to the Campaign Legal Center,
Sophia Gonsalves-Brown

May 5, 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 Sophia Gonsalves-Brown

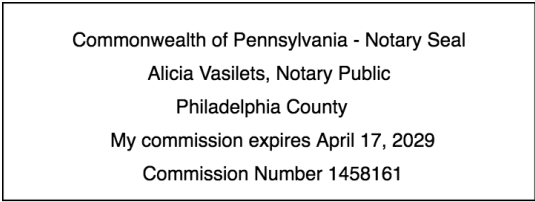
Sophia Gonsalves-Brown

Sophia Gonsalves-Brown

Sworn to and subscribed before me this 5th day of May 2026.

Alicia Vasilets

Notary Public Alicia Vasilets



04/17/2029

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.

State of Nevada

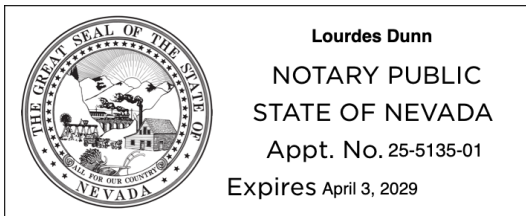
County of Clark

Sworn to and subscribed before me this 5th day of May 2026.

by Saurav Ghosh.



Notary Public



Notarized remotely using audio-video communication technology via Proof.

Exhibit A

Supporting
Republican
candidates dedicated
**to advancing
AI innovation
in America**

CONTACT US

AI is already reshaping the global economy, and America must lead in developing policies that guide its growth — driving innovation, strengthening competitiveness, and delivering economic benefits for working people across the country.

American Mission backs Republican candidates who champion a pro-innovation, pro-AI vision that ensures America remains the global leader in artificial intelligence - and opposes those who do not.

American Mission is a federal independent expenditure-only committee registered with the Federal Election Commission.

Paid for by American Mission. Not authorized by any candidate or candidate's committee. www.americanmission.com

Privacy Policy

Exhibit B



Supporting Democratic
candidates dedicated to
**advancing AI
innovation in
America**

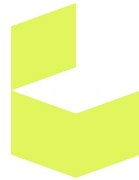
Meet Who We Support

**AI is already reshaping the global economy, and America must
lead in developing policies that guide its growth — driving**

innovation, strengthening competitiveness, and delivering economic benefits for working people across the country.

Think Big's mission is to back Democratic candidates who champion a pro-innovation, pro-AI vision that ensures America remains the global leader in artificial intelligence — and to oppose those who do not.

Think Big is a federal independent expenditure committee registered with the Federal Election Commission.



[Privacy Policy](#)



Paid for by Think Big (www.thinkbigpac.ai). Not authorized by any candidate or candidate's committee.

Exhibit C

Department of State: Division of Corporations

[Allowable Characters](#)

HOME

Entity Details

THIS IS NOT A STATEMENT OF GOOD STANDING

[File Number:](#) **10385832** [Incorporation Date / Formation Date:](#) **10/30/2025**
(mm/dd/yyyy)

[Entity Name:](#) **SUMMIT RIDGE MEDIA GROUP LLC**

[Entity Kind:](#) **Limited Liability Company** [Entity Type:](#) **General**

[Residency:](#) **Domestic** State: **DELAWARE**

[REGISTERED AGENT INFORMATION](#)

Name: **THE CORPORATION TRUST COMPANY**

Address: **CORPORATION TRUST CENTER 1209 ORANGE ST**

City: **WILMINGTON** County: **New Castle**

State: **DE** Postal Code: **19801**

Phone: **302-658-7581**

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

Submit

New Entity Search

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Exhibit D



Contributions Query Results

[About the Campaign Finance Data Base](#)

If all contributions for a reporting period are less than 1 dollar they may not be displayed.

Search Criteria:

Detail of Committees

Election Year: 2026 General Election

With Candidate Last Name Starts With: american mission

Committee Type: All

Candidate/Committee	Date	Amount	Typ	Contributor Name	Address	City State Zip
American Mission Florida (PAC)	03/04/2026	3,000,000.00	CHE	LEADING THE FUTURE	675 S GREEN VALLEY PKWY, NUM 1333	HENDERSON, NV 89052
		Total:				
1 Contribution(s) Selected						

[Query the Campaign Finance Data Base](#)

[\[Department of State\]](#) [\[Division of Elections\]](#) [\[Campaign Finance - Contributions\]](#)



Expenditures Query Results

[About the Campaign Finance Data Base](#)

Search Criteria:

Detail of Committees

Election Year: 2026 General Election

With Committee Name Starts With: american mission

Committee Type: All

Candidate/Committee	Date	Amount	Payee Name	Address	City State Zip	Pur
American Mission Florida (PAC)	03/04/2026	2.50	CHAIN BRIDGE BANK	1445-A LAUGHLIN AVE	MCLEAN, VA 22101	BAN
American Mission Florida (PAC)	03/04/2026	2,250,318.33	SUMMIT RIDGE MEDIA GROUP LLC	5150 MAE ANNE AVE, SUITE 405, PMB 1141	RENO, NV 89523	MED
American Mission Florida (PAC)	03/31/2026	2.50	CHAIN BRIDGE BANK	1445-A LAUGHLIN AVE	MCLEAN, VA 22101	BAN
American Mission Florida (PAC)	03/31/2026	847.50	SUMMIT RIDGE MEDIA GROUP LLC	5150 MAE ANNE AVE, SUITE 405, PMB 1141	RENO, NV 89523	DES
		Total:	2,251,170.83			

4 Contribution(s) Selected

[Query the Campaign Finance Data Base](#)

[[Department of State](#)] [[Division of Elections](#)] [[Campaign Finance - Expenditures](#)]

Exhibit E

Department of State: Division of Corporations

[Allowable Characters](#)

HOME

Entity Details

THIS IS NOT A STATEMENT OF GOOD STANDING

[File Number:](#) **10385842** [Incorporation Date /](#) **10/30/2025**
[Formation Date:](#) (mm/dd/yyyy)

[Entity Name:](#) **LANTERN PRODUCTION CONSULTANTS LLC**

[Entity Kind:](#) **Limited Liability Company** [Entity Type:](#) **General**

[Residency:](#) **Domestic** State: **DELAWARE**

[REGISTERED AGENT INFORMATION](#)

Name: **THE CORPORATION TRUST COMPANY**

Address: **CORPORATION TRUST CENTER 1209 ORANGE ST**

City: **WILMINGTON** County: **New Castle**

State: **DE** Postal Code: **19801**

Phone: **302-658-7581**

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

Submit

New Entity Search

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

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Appendix A

American Mission's Reported Disbursements to Summit LLC

Date	Amount	Purpose	Category
12/12/2025	\$235,000	Media Placement	IE
12/16/2025	\$8,525	Media Production	IE
12/23/2026	\$500	Pre-Payment for Media Production	Overhead
1/9/2026	\$2,500	Bank Fee	Overhead
1/20/2026	\$354,025	Media Placement/Media Production	IE
1/21/2026	\$150,000	Digital Media Placement/Digital Media Production/SMS Messages	IE
2/6/2026	\$10,252	Media Consulting/Website Services	Overhead
2/11/2026	\$509,067	Media Production/Media Placement	IE
2/13/2026	\$5,052	Website Services	Overhead
2/20/2026	\$511,025	Media Placement/Media Production	IE
3/4/2026	\$68,946	Media Placement/Media Production	IE
3/4/2026	\$60,421	Media Placement	
3/9/2026	\$301,350	Media Placement/Media Production/SMS Messaging	IE
3/11/2026	\$277,636	Media Placement	IE
3/16/2026	\$10,436	Website Services	Overhead
3/20/2026	\$94,636	Media Placement/Media Production/Text Messaging	IE
3/20/2026	\$341,943	Media Placement/Text Messaging	IE
3/27/2026	\$1,139	Strategic Media Consulting	Overhead
3/31/2026	\$250,000	Media Placement/Text Messaging	IE
4/17/2026	\$951,928	Media Placement	IE
4/20/2026	\$8,500	Media Production	IE
TOTAL	\$4,152,882	(\$4,123,003 on IEs; \$29,879 on overhead)	

Appendix B

Think Big's Reported Disbursements to Lantern LLC

Date	Amount	Purpose	Category
12/10/2025	\$118,350	Digital Media Placement/Digital Media Production	IE
1/5/2026	\$52,650	Agency Deposit Fee, Research	Overhead
1/8/2026	\$13,525	Research	Overhead
1/15/2026	\$40,025	Community Media Engagement	Overhead
1/23/2026	\$20,025	Strategy Consulting	Overhead
1/23/2026	\$326,002	Cable Advertising, Digital Advertising, Print Advertising	IE
1/29/2026	\$266,025	Polling	Overhead
1/29/2026	\$81,648	Direct Mail Production/Distribution	IE
1/30/2026	\$60,000	SMS/MMS Messaging	IE
1/30/2026	\$124,772	Digital Advertising/Production	IE
2/4/2026	\$81,623	Direct Mail Production/Distribution	IE
2/4/2026	\$231,969	Cable Advertising/Production	IE
2/6/2026	\$41,500	Research	Overhead
2/6/2026	\$113,661	Digital Advertising/Production	IE
2/13/2026	\$25	Payment Processing Fee	Overhead
2/13/2026	\$113,661	Digital Advertising/Production	IE
2/13/2026	\$11,111	Digital Advertising	IE
2/13/2026	\$72,894	Direct Mail Production/Distribution	IE
2/13/2026	\$555,568	Digital Advertising/Production	IE
2/13/2026	\$555,568	Digital Advertising/Production	IE
2/13/2026	\$555,568	Digital Advertising/Production	IE
2/13/2026	\$555,568	Digital Advertising/Production	IE
2/13/2026	\$81,623	Direct Mail Production/Distribution	IE
2/17/2026	\$4,509	SMS/MMS Messaging	IE
2/17/2026	\$6,199	SMS/MMS Messaging	IE
2/20/2026	\$116,136	Digital Advertising/Production	IE
2/20/2026	\$98,751	Cable Advertising/Production	IE
2/25/2026	\$20,025	Strategy Consulting	Overhead
2/25/2026	\$170,025	Polling	Overhead
2/25/2026	\$42,500	Polling	Overhead
2/25/2026	\$30,000	Media Consulting	Overhead
2/27/2026	\$200,000	Texting Services	Overhead
2/27/2026	\$200,012	Texting Services	Overhead
2/27/2026	\$200,012	Texting Services	Overhead
3/2/2026	\$35,000	Digital Media Production	IE
3/2/2026	\$171,136	Digital Media Placement	IE
3/2/2026	\$111,136	Print Advertising	IE
3/3/2026	\$41,500	Polling	Overhead
3/3/2026	\$7,500	Management Consulting	Overhead
3/3/2026	\$13,500	[No Purpose Provided]	Overhead
3/11/2026	\$277,827	Digital Media Placement	IE

3/11/2026	\$50,000	Texting	IE
3/16/2026	\$256,691	Digital Advertising/Production	IE
3/16/2026	\$83,799	Print Advertising	IE
3/26/2026	\$36,500	Polling	Overhead
3/27/2026	\$79,641	Cable Advertising/Production	IE
3/31/2026	\$20,025	Strategy Consulting	Overhead
3/31/2026	\$20,000	Media Production	Overhead
3/31/2026	\$25,000	Political Consulting	Overhead
3/31/2026	\$43,500	Polling	Overhead
3/31/2026	\$7,512	Management Consulting	Overhead
4/10/2026	\$34,874	SMS/MMS Messaging	IE
4/10/2026	\$22,776	SMS/MMS Messaging	IE
TOTAL	\$6,499,447	(\$4,988,061 on IEs; \$1,511,386 on overhead)	