

**BEFORE THE FEDERAL ELECTION COMMISSION**

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

v.

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

AMERICAN LIBERTY FOUNDATION  
and THOMAS DATWYLER in his  
official capacity as treasurer  
PO Box 183  
Hudson, WI 54016

AMERICAN LIBERTY ACTION FUND  
502 6th Street  
Hudson, WI 54016

THE GEO GROUP, INC.  
1 Park Place, Suite 700  
621 NW 53rd Street  
Boca Raton, FL 33487

**COMPLAINT**

1. American Liberty Foundation (“ALF PAC”), a hybrid political committee that functions like a super PAC, appears to have egregiously misreported the true source of a \$250,000 contribution—representing more than a quarter of its total funding this election cycle—from The GEO Group, Inc. (“GEO Group”), a private prison company that is presently the largest federal contractor for U.S. Immigration and Customs Enforcement (“ICE”). Specifically, while ALF PAC reported receiving a \$250,000 contribution from “The GEO Group, Inc. Political Action Committee” (the GEO Group’s affiliated corporate PAC), the GEO Group states that a different legal entity, “The GEO Group Inc. Political Contribution Account” (the “GEO Account”), made this \$250,000 contribution not to ALF PAC but to an affiliated 501(c)(4) nonprofit corporation, American Liberty Action Fund (“ALAF”). These facts indicate that ALF PAC has violated federal reporting

requirements by misattributing the source of the contribution. Additionally, the GEO Group and/or the GEO Account appear to have violated the federal law that bars federal contractors from making political contributions, and either ALAF or ALF PAC appear to have violated the same law by soliciting that contribution.

2. This complaint is filed pursuant to 52 U.S.C. § 30109(a)(1) and is based on information and belief that ALF PAC and Thomas Datwyler in his official capacity as treasurer, ALAF, and The GEO Group, Inc. have violated the Federal Election Campaign Act (“FECA” or the “Act”), 52 U.S.C. § 30101, *et seq.*<sup>1</sup>

#### FACTS

3. ALF PAC is a hybrid political committee registered with the Federal Election Commission (the “Commission” or “FEC”).<sup>2</sup> Thomas Datwyler serves as its treasurer.<sup>3</sup> ALF PAC has a bare-bones website with a brief purpose statement, a donate button, and a “sign up” form that collects contact information for its mailing list.<sup>4</sup> It does not appear to have any other online presence, and the public record does not reflect ALF PAC engaging in any activity outside of what it has reported to the FEC.
4. ALAF is a 501(c)(4) nonprofit corporation that appears to be affiliated with ALF PAC.<sup>5</sup> Thomas Datwyler also serves as ALAF’s treasurer and signed ALAF’s 2024 IRS Form

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<sup>1</sup> See 52 U.S.C. § 30109(a)(2); *see also* 11 C.F.R. § 111.4(a).

<sup>2</sup> American Liberty Foundation, Amend. Statement of Org. at 2 (Mar. 26, 2026), <https://docquery.fec.gov/pdf/628/202603269856856628/202603269856856628.pdf>.

<sup>3</sup> *Id.* at 1.

<sup>4</sup> See American Liberty Foundation, <https://www.fundliberty.us/> (last visited May 26, 2026).

<sup>5</sup> The ALF PAC and ALAF websites have identical logos and ALAF has transferred money to ALF PAC. Compare American Liberty Foundation, <https://www.fundliberty.us/> (last visited May 22, 2026), with American Liberty Action Fund, <https://www.americanlibertyactionfund.com/> (last visited May 22, 2026); *see also* American Liberty Foundation Receipts (Filter Source Details: “American Liberty Action Fund”), FEC, [https://www.fec.gov/data/receipts/?data\\_type=processed&committee\\_id=C00830042&contributor\\_name=american+liberty+action+fund&two\\_year\\_transaction\\_period=2024&two\\_year\\_transaction\\_period=2026&two\\_year\\_transaction\\_period=2022](https://www.fec.gov/data/receipts/?data_type=processed&committee_id=C00830042&contributor_name=american+liberty+action+fund&two_year_transaction_period=2024&two_year_transaction_period=2026&two_year_transaction_period=2022) (last visited May 22, 2026).

990 as its “principal officer.”<sup>6</sup> ALAF has a similarly bare-bones website, and the public record contains no indication of ALAF conducting any outward-facing work.<sup>7</sup>

5. ALF PAC and ALAF are both affiliated with Representative Jim Jordan. ALF PAC is part of a joint fundraising committee named “Team Jordan,” which has three participants: ALF PAC, Jordan’s campaign committee, and Jordan’s leadership PAC.<sup>8</sup> Jim Jordan’s long-tenured former chief of staff, Raymond Yonkura, is the president of ALAF, and his wife, Catherine Yonkura, is ALAF’s secretary.<sup>9</sup>
6. Rep. Jordan is the chair of U.S. House Committee on the Judiciary for the 119th Congress (2025–2026).<sup>10</sup> The Judiciary Committee has jurisdiction over immigration issues and the criminal justice system, and has oversight over the Department of Justice (“DOJ”) and ICE.<sup>11</sup>
7. The GEO Group, Inc. is a private prison company that operates detention facilities for ICE and the DOJ.<sup>12</sup> It is ICE’s largest contractor, winning \$2.1 billion in total obligations

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<sup>6</sup> American Liberty Action Fund, 2024 Form 990 at 1 (May 7, 2025), [https://apps.irs.gov/pub/epostcard/cor/884414963\\_202412\\_990O\\_2025080723634752.pdf](https://apps.irs.gov/pub/epostcard/cor/884414963_202412_990O_2025080723634752.pdf).

<sup>7</sup> See American Liberty Action Fund, <https://www.americanlibertyactionfund.com/> (last visited May 26, 2026).

<sup>8</sup> See Team Jordan, Amend. Statement of Org. at 2, 5 (June 2, 2025), <https://docquery.fec.gov/pdf/974/202506029761729974/202506029761729974.pdf>; see also Buckeye Liberty Political Action Committee, Amend. Statement of Org. at 6 (June 2, 2025), <https://docquery.fec.gov/pdf/455/202506029761729455/202506029761729455.pdf>.

<sup>9</sup> See American Liberty Action Fund, 2024 Form 990 at 7; *Ray Yonkura*, LegiStorm, [https://www.legistorm.com/person/bio/34405/Raymond\\_C\\_Yonkura.html](https://www.legistorm.com/person/bio/34405/Raymond_C_Yonkura.html) (last visited May 23, 2026). Raymond Yonkura, Catherine Yonkura, and Datwyler also served as the officers of an identically named 501(c)(3) charitable nonprofit, American Liberty Foundation. See American Liberty Foundation, 2024 Form 990EZ at 2, <https://projects.propublica.org/nonprofits/organizations/921361634/202541359349201744/full>.

<sup>10</sup> See *Committee on the Judiciary*, U.S. House, <https://judiciary.house.gov/subcommittees/committee-judiciary-119th-congress> (last visited May 22, 2026).

<sup>11</sup> See *id.*; *About the Committee*, U.S. House, <https://judiciary.house.gov/about-the-committee> (last visited May 23, 2026).

<sup>12</sup> See GEO Group, 2025 Annual Rpt. at 8 (Dec. 31, 2025), <https://investors.geogroup.com/static-files/1f07849f-9af5-4d49-9b1d-484eda283140>.

in 2025 alone.<sup>13</sup> In its 2025 annual report, GEO Group stated that ICE contracts accounted for 48% of its total revenue, and it touted that it obtained “the largest amount of new business we have won in a single year in our Company’s history.”<sup>14</sup>

8. GEO Group’s record growth in 2025 can be attributed, at least in part, to Congress’s passage of the “One Big Beautiful Bill Act,” which President Trump signed into law on July 4, 2025.<sup>15</sup> The “One Big Beautiful Bill Act” tripled ICE’s annual budget, made it the federal government’s largest law enforcement agency, and earmarked \$45 billion for building new immigration detention centers.<sup>16</sup>
9. Eleven days after the “One Big Beautiful Bill Act” became law, on July 15, 2025, the Jordan-affiliated ALF PAC reported receiving a \$250,000 contribution from “The GEO Group, Inc. PAC,” the GEO Group’s separate segregated fund (“SSF”)—*i.e.*, a PAC administered by a corporation that collects contributions from its officers and employees.<sup>17</sup> GEO Group’s PAC, however, never reported making the \$250,000 contribution on any of its FEC reports.<sup>18</sup>

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<sup>13</sup> Lauren-Brooke Eisen, *Private Prison Companies’ Enormous Windfall: Who Stands to Gain as ICE Expands*, Brennan Ctr. for Justice (Oct. 1, 2025), <https://www.brennancenter.org/our-work/analysis-opinion/private-prison-companies-enormous-windfall-who-stands-gain-ice-expands>; Emma Sullivan, *Some Trump Major Donors Are Now Reaping Billions in ICE Contracts*, OpenSecrets (Mar. 25, 2026), <https://www.opensecrets.org/news/2026/03/some-major-trump-donors-are-now-reaping-billions-in-ice-contracts/>.

<sup>14</sup> GEO Group, 2025 Annual Rpt., *supra* note 12, at 1–2.

<sup>15</sup> See *H.R. 1*, Congress.gov (July 4, 2025), <https://www.congress.gov/bill/119th-congress/house-bill/1>.

<sup>16</sup> See Eisen, *supra* note 13.

<sup>17</sup> American Liberty Foundation, 2nd Amend. 2025 Year-End Rpt. at 267 (Apr. 6, 2026), <https://docquery.fec.gov/pdf/509/202604069857012509/202604069857012509.pdf>; see The GEO Group, Inc. Political Action Committee, Amend. Statement of Org. at 2–3 (May 11, 2026), <https://docquery.fec.gov/pdf/279/202605119866916279/202605119866916279.pdf>; see also 52 U.S.C. §§ 30101(4)(B), 30118(b)(2)(C); 11 C.F.R. § 114.5.

<sup>18</sup> See *The GEO Group, Inc. Political Action Committee Disbursements (2025–2026)*, FEC, [https://www.fec.gov/data/disbursements/?committee\\_id=C00382150&two\\_year\\_transaction\\_period=2026&data\\_type=processed](https://www.fec.gov/data/disbursements/?committee_id=C00382150&two_year_transaction_period=2026&data_type=processed) (last visited May 23, 2026).

10. When the Project on Government Oversight (“POGO”) questioned GEO Group about its SSF’s apparent reporting error, GEO Group responded that the SSF did not make the contribution.<sup>19</sup> The company stated that the GEO Group made the contribution from “The GEO Group Inc. Political Contribution Account” to ALAF, not ALF PAC.<sup>20</sup> Therefore, according to GEO Group, both the reported source and recipient of this \$250,000 contribution were incorrect.
11. ALAF and ALF PAC did not respond to POGO’s questions or otherwise explain how this reporting error occurred.<sup>21</sup> To date, ALF PAC has not amended its 2025 Year-End report to disclose that the correct source of the \$250,000 contribution was “The GEO Group Inc. Political Contribution Account.”<sup>22</sup> It is unclear whether ALF PAC deposited the \$250,000 directly into its non-contribution account, or whether ALAF initially deposited the money and then transferred it to ALF PAC—a setup that may have run afoul of FECA’s prohibition on contributions in the name of another.<sup>23</sup>
12. However, the size of the contribution, relative to ALF PAC’s reported spending, makes clear that ALF PAC received and spent at least part of this money; this was not just an accounting or recordkeeping error. During the 2026 election cycle, ALF PAC reported a beginning cash on hand balance of \$22,863.71, and through March 31, 2026, it has reported raising \$989,339.25—such that the \$250,000 it incorrectly reported receiving

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<sup>19</sup> Nick Schwellenbach, *GEO Group’s “Dark Money” Donation to a Group Tied to a Top Lawmaker*, Project on Gov. Oversight Investigates (May 27, 2026) <https://www.pogo.org/investigates/geo-groups-dark-money-donation-to-a-group-tied-to-a-top-lawmaker>.

<sup>20</sup> *Id.*

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

<sup>22</sup> See *American Liberty Foundation, Comm. Filings*, FEC, <https://www.fec.gov/data/committee/C00830042/?tab=filings> (last visited May 23, 2026).

<sup>23</sup> See 52 U.S.C. § 30122; see also MUR 6920 (American Conservative Union) (Nov. 3, 2017), <https://www.fec.gov/data/legal/matter-under-review/6920/>.

from GEO Group’s SSF comprises over 25% of its receipts this cycle—and spending \$849,824.91 (including two independent expenditures it reported making in May 2026), with no outstanding debts or loans.<sup>24</sup> As such, ALF PAC could only have accomplished its reported spending on its electoral activities this cycle by spending some portion of GEO Group’s misreported \$250,000 contribution.<sup>25</sup>

13. According to GEO Group, “The GEO Group Inc. Political Contribution Account” made the contribution to ALAF.<sup>26</sup> A search of business records from across the country and the IRS database of nonprofit and political organizations, however, does not turn up any entity by that name.<sup>27</sup> It appears that “The GEO Group Inc. Political Contribution Account” is a bank account the company uses to make political contributions and expenditures. Indeed, many 527 organizations that are active only in state elections have reported receiving contributions from “The GEO Group Inc. Political Contribution Account.”<sup>28</sup> These groups report the GEO Account’s address as 621 N.W. 53rd St., Suite 700, Boca Raton, FL or One Park Place, Suite 700, Boca Raton FL.<sup>29</sup> According to federal records, The GEO Group, Inc. lists an essentially identical address: 1 Park Place,

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<sup>24</sup> *American Liberty Foundation Financial Summary*, FEC, <https://www.fec.gov/data/committee/C00830042/> (last visited May 26, 2026).

<sup>25</sup> *See id.*

<sup>26</sup> Schwellenbach, *supra* note 19.

<sup>27</sup> “The GEO Group Inc. Political Contribution Account” is not a registered company anywhere in the country, and there are no records of it registering with the Internal Revenue Services as a 527 organization or any other form of nonprofit. *See Search: “Political Contribution Account,”* OpenCorporates, [https://opencorporates.com/companies?utf8=%E2%9C%93&q=%22political+contribution+account%22&commit=Go&jurisdiction\\_code=&utf8=%E2%9C%93&type=companies&controller=searches&action=search\\_companies&order=](https://opencorporates.com/companies?utf8=%E2%9C%93&q=%22political+contribution+account%22&commit=Go&jurisdiction_code=&utf8=%E2%9C%93&type=companies&controller=searches&action=search_companies&order=) (last visited May 25, 2026); *Tax Exempt Organization Search: “Political Contribution Account,”* IRS, <https://apps.irs.gov/app/eos/> (last visited May 25, 2026).

<sup>28</sup> *527 Explorer: “GEO Group Inc. Political Contribution Account,”* ProPublica, <https://projects.propublica.org/527-explorer/search?search=GEO+Group+Inc.+political+contribution+account&toggle=contributions> (last visited May 26, 2026).

<sup>29</sup> *See id.*

Suite 700, 621 N.W. 53rd St., Boca Raton, FL.<sup>30</sup> The shared address provides further confirmation that the GEO Account is not distinct from The GEO Group, Inc.

14. The GEO Group, Inc. was a federal contractor on July 15, 2025. Data from USASpending.gov, “the official source for spending data for the U.S. Government,” reveals that it held 28 active federal contracts totaling over \$2.5 billion on the date of the contribution.<sup>31</sup>

#### SUMMARY OF THE LAW

15. 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.”<sup>32</sup> The reason-to-believe finding is a threshold determination and “does not establish that the law has been violated.”<sup>33</sup> The Commission uses the ensuing investigation “to determine whether a violation in fact occurred and, if so, its exact scope.”<sup>34</sup> 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.<sup>35</sup>

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<sup>30</sup> See, e.g., *DJJODT7C0003 Contract Summary*, USASpending, [https://www.usaspending.gov/award/CONT\\_AWD\\_DJJODT7C0003\\_1501\\_-NONE\\_-NONE-](https://www.usaspending.gov/award/CONT_AWD_DJJODT7C0003_1501_-NONE_-NONE-) (last visited May 26, 2026).

<sup>31</sup> See Exh. 1.

<sup>32</sup> 52 U.S.C. § 30109(a)(2); see 11 C.F.R. § 111.10(a).

<sup>33</sup> 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](https://www.fec.gov/resources/cms-content/documents/fedreg_notice_2024-08.pdf).

<sup>34</sup> *Id.*

<sup>35</sup> *Id.*

### *Contribution Reporting*

16. FECA requires each treasurer of a political committee to file regular reports of receipts and disbursements with the Commission.<sup>36</sup> Each report must provide, *inter alia*, the name and address of each person who contributes more than \$200 in the aggregate to a committee during a calendar year.<sup>37</sup>
17. The requirement to completely and accurately report a committee’s donors in a timely manner serves multiple important government interests, including allowing voters to cast an informed ballot, deterring unlawful activity, and providing the data necessary to detect and remedy unlawful contributions.<sup>38</sup>

### *Federal Contractor Prohibitions*

18. FECA prohibits a federal contractor from making any “contribution to any political party, committee, or candidate for public office” at any time between the commencement of negotiations for a federal contract and the completion of performance or termination of negotiations for the contract.<sup>39</sup> FECA additionally prohibits any person from knowingly soliciting such a contribution from a federal contractor.<sup>40</sup>
19. The contractor contribution ban applies to any “person”—defined to include “an individual, partnership, committee, association, corporation, labor organization, or any other organization or group of persons”<sup>41</sup>—who “enters into any contract with the United States or any department or agency thereof” for “the rendition of personal services” or for “furnishing any material, supplies, or equipment,” or for “selling any land or building,” if

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<sup>36</sup> 52 U.S.C. § 30104(a)(1); 11 C.F.R. § 104.1(a).

<sup>37</sup> 52 U.S.C. § 30104(b)(3)(A); 11 C.F.R. §§ 104.3(a)(4)(i), 100.12.

<sup>38</sup> *Buckley v. Valeo*, 424 U.S. 1, 67–68 (1976).

<sup>39</sup> 52 U.S.C. § 30119(a)(1).

<sup>40</sup> *Id.* § 30119(a)(2).

<sup>41</sup> *Id.* § 30101(11).

“payment for the performance of such contract or payment for such material, supplies, equipment, land, or building is to be made in whole or in part from funds appropriated by the Congress.”<sup>42</sup> In MUR 8021, the Commission emphasized that “the plain language of section 30119 covers ‘any contract with the United States or any department or agency thereof’” in concluding that a “master Contract” or “indefinite delivery/indefinite quantity” contract “is a contract for purposes of section 30119.”<sup>43</sup>

20. The contractor contribution ban applies from when a request for proposals is sent out (or when contractual negotiations commence) until the completion of performance of the contract or the termination of negotiations.<sup>44</sup>
21. The Commission has consistently made clear that the government contractor prohibition applies to contributions to super PACs: In MUR 6403, the Commission emphasized that a contractor making a contribution to a political committee to fund independent expenditures is not itself making an expenditure; therefore, a contribution to such a committee falls “squarely within the statute’s prohibitions.”<sup>45</sup>
22. The federal contractor ban applies in circumstances where there is “a very specific quo for which the contribution may serve as the quid,” and it was upheld unanimously by the en banc U.S. Court of Appeals for the D.C. Circuit in *Wagner v. FEC*, where the court stated that “the record offers every reason to believe that, if the dam barring contributions were

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<sup>42</sup> *Id.* § 30119(a)(1); 11 C.F.R. § 115.1(a).

<sup>43</sup> Factual & Legal Analysis at 8, MUR 8021 (Ohio Ordnance Works), [https://www.fec.gov/files/legal/murs/8021/8021\\_11.pdf](https://www.fec.gov/files/legal/murs/8021/8021_11.pdf).

<sup>44</sup> 52 U.S.C. § 30119(a)(1); 11 C.F.R. § 115.1(b).

<sup>45</sup> Factual & Legal Analysis at 5, 9, MUR 6403 (Alaskans Standing Together), <https://www.fec.gov/files/legal/murs/6403/11044304929.pdf>.

broken, more money in exchange for contracts would flow through the same channels already on display.”<sup>46</sup>

## CAUSES OF ACTION

### COUNT I:

#### **AMERICAN LIBERTY FOUNDATION VIOLATED 52 U.S.C. § 30104(B)(3)(A) BY FAILING TO ACCURATELY REPORT THE TRUE SOURCE OF A \$250,000 CONTRIBUTION**

23. Based on GEO Group’s public statement that it contributed \$250,000 to ALAF from the GEO Account, not from its SSF, there is reason to believe that ALF PAC misreported the source of GEO Group’s \$250,000 contribution.
24. ALF PAC’s 2025 Year-End Report states that ALF PAC received a \$250,000 contribution on July 15, 2025, from “The GEO Group, Inc. PAC.”<sup>47</sup> However, The GEO Group, Inc. PAC never reported making this contribution, and a GEO Group spokesperson stated that the contribution in question came from the GEO Account, which is a separate entity with an entirely different setup and purpose.<sup>48</sup>
25. Even after a reporter approached ALF PAC for clarification or comment, ALF PAC has not amended its 2025 Year-End report to correct its apparent error in reporting the true source of *more than a quarter* of its receipts this election cycle.<sup>49</sup> This glaring error has obscured, for nearly a year, where ALF PAC actually obtained funding for its 2026 election cycle activities, which have required the PAC to spend at least a portion of the misreported funds<sup>50</sup>—fundamentally undermining voters’ right to know who is spending money to influence their vote.

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<sup>46</sup> *Wagner v. FEC*, 793 F.3d 1, 18, 22 (D.C. Cir. 2015) (en banc).

<sup>47</sup> *See supra* ¶ 9.

<sup>48</sup> *See supra* ¶¶ 9–10, 13.

<sup>49</sup> *See supra* ¶¶ 11–12.

<sup>50</sup> *See supra* ¶ 12.

26. Moreover, ALF PAC's lack of transparency is particularly egregious because it undermines a core purpose of FECA's reporting regime—namely, ensuring that contributor information is on the public record so that the Commission and others can detect illegal transactions and enforce the laws barring them.<sup>51</sup> ALF PAC's errant reporting appears to have concealed the fact that the source of this \$250,000 contribution was a prohibited federal contractor, as detailed in Count II, below, thus allowing ALF PAC to spend some portion of a six-figure illicit sum, unchecked, for close to a year.
27. Because ALF PAC has misreported the source of a \$250,000 contribution, there is reason to believe it violated 52 U.S.C. § 30104(b)(3)(A).

**COUNT II:**

**THE GEO GROUP, INC. MADE, AND AMERICAN LIBERTY ACTION FUND OR  
AMERICAN LIBERTY FOUNDATION KNOWINGLY SOLICITED, A FEDERAL CONTRACTOR  
CONTRIBUTION, IN VIOLATION OF 52 U.S.C. § 30119**

28. There is also reason to believe that GEO Group, Inc. made, and ALF PAC and/or ALAF knowingly solicited, a prohibited federal contractor contribution.
29. According to GEO Group's statements to POGO, GEO Group used the GEO Account to make a \$250,000 contribution to ALAF.<sup>52</sup> The GEO Account appears to be part of The GEO Group, Inc, which—based on USASpending.gov data—held over \$2.5 billion in federal government contracts on July 15, 2025, the date of the contribution as reported by ALF PAC.<sup>53</sup> Therefore, GEO Group was a federal contractor within the meaning of the Act when it contributed to ALAF.<sup>54</sup> Although it is unclear how a contribution that GEO Group represents it made to ALAF ended up in ALF PAC's account, it is clear that ALF

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<sup>51</sup> See *Buckley*, 424 U.S. at 67–68.

<sup>52</sup> See *supra* ¶ 10.

<sup>53</sup> See *supra* ¶¶ 13–14.

<sup>54</sup> See 52 U.S.C. § 30119(a)(1).

PAC reported, deposited, and at least partially spent \$250,000 in funds originating from GEO Group,<sup>55</sup> during a period that GEO Group was a federal contractor. Accordingly, there is reason to believe GEO Group made a prohibited contribution.

30. It is immaterial that GEO Group’s contribution was made from the GEO Account because that account does not appear to be legally distinct from GEO Group.<sup>56</sup> The GEO Account does not appear to be registered as a distinct legal entity in either state business or IRS records and it shares an address with GEO Group. It appears to be merely a separate GEO Group bank account designated for making political contributions.<sup>57</sup>
31. GEO Group’s statement that it made the \$250,000 contribution to ALAF, a 501(c)(4) organization, is likewise immaterial. ALF PAC, a political committee, deposited, reported, and spent GEO Group’s contribution,<sup>58</sup> and there is thus reason to believe GEO Group “directly or indirectly” made a contribution to ALF PAC. As a federal contractor, GEO Group is prohibited from making such a contribution.<sup>59</sup> If ALF PAC (which has the same treasurer as ALAF, Thomas Datwyler) deposited GEO Group’s contribution, either by design or in error, then GEO Group directly made an unlawful federal contractor contribution.<sup>60</sup> If, alternatively, ALAF accepted the contribution and then passed the money on to ALF PAC, GEO Group *indirectly* made an unlawful federal contractor contribution.<sup>61</sup> GEO Group could have instructed ALAF to use the \$250,000 exclusively

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<sup>55</sup> See *supra* ¶ 12.

<sup>56</sup> See *supra* ¶ 13.

<sup>57</sup> See *supra* ¶ 13. The fact that GEO Group has never before used the GEO Account to make contributions to federal political committees, but has exclusively used it to contribute to (1) political organizations that disclose their donors but do not spend money on federal elections, and (2) a dark money nonprofit corporation, suggests that GEO Group recognizes that the GEO Account is subject to the federal contractor prohibition. See *supra* ¶¶ 10, 13.

<sup>58</sup> See *supra* ¶ 12.

<sup>59</sup> See *supra* ¶ 14; see also 52 U.S.C. § 30119(a).

<sup>60</sup> See *supra* ¶¶ 3–4.

<sup>61</sup> See 52 U.S.C. § 30119(a).

for its social welfare purpose, barring ALAF from spending the money to influence elections. But ALF PAC received and spent at least a portion of GEO Group’s illegal \$250,000 contractor contribution on its 2026 election cycle activities.<sup>62</sup>

32. Furthermore, there is reason to believe that ALAF and/or ALF PAC knowingly solicited this prohibited contribution. GEO Group is one of the largest federal contractors in the country, and it is ICE’s largest contractor.<sup>63</sup> The GEO Group’s contract work—privately operating ICE detention centers—has been frequently reported in the news (including for months before the July 2025 reported contribution at issue),<sup>64</sup> and its contracts are clearly and prominently disclosed on USASpending.gov.<sup>65</sup> As such, there is reason to believe ALAF and ALF PAC knew or reasonably should have known that GEO Group was a federal contractor at the time of the contribution.
33. Moreover, there is reason to believe GEO Group provided this \$250,000 in response to a solicitation for a political contribution benefiting ALF PAC. ALAF and ALF PAC have no public presence outside of their bare-bones websites, and there is no indication that they advertise their work or do anything that would draw GEO Group’s attention to their activities.<sup>66</sup> It is therefore highly unlikely that GEO Group somehow discovered ALAF

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<sup>62</sup> See *supra* ¶ 12.

<sup>63</sup> See *supra* ¶ 7.

<sup>64</sup> See, e.g., Meg Anderson, *Private Prisons and Local Jails are Ramping Up as ICE Detention Exceeds Capacity*, NPR (Jun. 4, 2025), <https://www.npr.org/2025/06/04/nx-s1-5417980/private-prisons-and-local-jails-are-ramping-up-as-ice-detention-exceeds-capacity> (“Nearly 90% of people in ICE custody are held in facilities run by for-profit, private companies. Two of the largest, Geo Group and CoreCivic, are working to increase their ability to meet the administration’s demand.”); Marianne Levine, *et al.*, *Private Prison Firms Prepare to Reopen Closed Facilities to Hold Immigrants*, Wash. Post (Feb. 28, 2025), <https://www.washingtonpost.com/immigration/2025/02/28/ice-detention-private-prison-newark/> (“ICE is working closely with private prison companies that operate many of the 114 ICE detention facilities around the country where detainee populations are nearing maximum capacity, company executives said. The two largest contractors, GEO and CoreCivic, together own 16 idle facilities that they say can reopen within a few months if they scramble to hire and train thousands of staff.”).

<sup>65</sup> See Exh. 1.

<sup>66</sup> See *supra* ¶¶ 3–4.

and/or ALF PAC and decided *sua sponte* to donate a quarter million dollars—an amount that immediately expanded ALF PAC’s reported receipts by over 25% for the 2026 election cycle.<sup>67</sup> Instead, these circumstances strongly support finding reason to believe that a representative of ALAF and/or ALF PAC solicited GEO Group to supply the funds for use by ALF PAC. Indeed, viewed in light of the fact that GEO Group’s funds were deposited, reported, and spent by ALF PAC, there is reason to believe GEO Group was specifically solicited to make a federal contribution—as FECA explicitly prohibits—to ALF PAC, whether that contribution went directly to ALF PAC’s account or flowed through ALAF, the 501(c)(4) nonprofit corporation, to ALF PAC, the political committee.

34. Viewed together, these facts provide reason to believe GEO Group made, and ALAF and/or ALF PAC knowingly solicited, a federal contractor contribution, in violation of 52 U.S.C. § 30119.
35. These violations strike at the core of the contractor prohibition. GEO Group funneled \$250,000 to a nonprofit corporation and its affiliated hybrid PAC, each of which are connected to Rep. Jim Jordan, who chairs a committee—House Judiciary—with oversight over the primary agencies, including ICE, that have supplied over \$2 billion in federal contracts to GEO Group.<sup>68</sup> Because GEO Group’s business heavily relies on the agencies that Jordan’s committee oversees, Jordan presents a prime target for GEO Group to influence.<sup>69</sup> The timing of its contribution—just *eleven days* after Congress and

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<sup>67</sup> See *supra* ¶ 12.

<sup>68</sup> See *supra* ¶¶ 6–7.

<sup>69</sup> See Schwellenbach, *supra* note 19 (“GEO’s \$250,000 donation came on July 15, 2025, according to a filing by the American Liberty Foundation — 11 days after the passage of the One Big Beautiful Bill Act, a bill GEO lobbied on in the months before it became law. That law is expected to boost the company’s bottom line through a massive

the President provided ICE with a record-breaking amount of money and authority to enter into \$45 billion worth of contracts for immigration detention centers—strongly suggests that GEO Group was attempting to curry favor with a key lawmaker on the eve of ICE opening up bidding for a new set of highly lucrative federal contracts.<sup>70</sup> Ultimately, GEO Group profited handsomely from these contracts, recording more success obtaining new contracts in 2025 than in any other year in its history.<sup>71</sup>

36. At a minimum, this set of events creates the strong appearance of pay-to-play corruption—the prevention of which is at the heart of federal campaign finance law. The Commission must act swiftly to investigate and hold the respondents accountable.

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expansion in ICE’s budget of tens of billions of dollars. Jordan was a vocal booster of the One Big Beautiful Bill Act’s passage. In a social media post, he wrote ‘It delivers Big, Beautiful Deportations’ and ‘It boosts Border Patrol and ICE agents on the frontlines.’ These parts of the law intersect with the jurisdiction of the congressional panel that Jordan chairs: the House Judiciary Committee.”).

<sup>70</sup> See *supra* ¶ 8–9.

<sup>71</sup> See *supra* ¶ 7.

**PRAYER FOR RELIEF**

37. Wherefore, the Commission should find reason to believe that ALF PAC, ALAF, and GEO Group violated 52 U.S.C. § 30101 *et seq.*, and conduct an immediate investigation under 52 U.S.C. § 30109(a)(2).
38. 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,  
Sophia Gonsalves-Brown

May 27, 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

State of Nevada County of Clark

Sworn to and subscribed before me this 27<sup>th</sup> day of May 2026.

  
Natasha S Samuels  
Notary Public



Notarized remotely using audio-video 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.

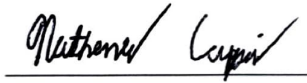
Sworn pursuant to 18 U.S.C. § 1001.

For Complainant Campaign Legal Center

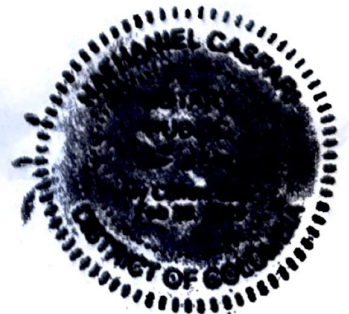


Saurav Ghosh, Esq.

Sworn to and subscribed before me this 27<sup>th</sup> day of May 2026.



Notary Public



# **Exhibit 1**

**The GEO Group, Inc.'s Federal Contracts Open on July 15, 2025**

	<b>Award ID</b>	<b>Agency</b>	<b>Base Action Date</b>	<b>End Date</b>	<b>Potential Value</b>
1	15BRRC19FUTW10062	DOJ	11/30/2018	4/30/2029	\$2,800,878.00
2	15BRRC19FUTW10080	DOJ	2/22/2019	3/31/2030	\$9,704,31.27
3	15BRRC19FUTW10127	DOJ	7/18/2019	3/31/2030	\$1,048,399.36
4	15BRRC20FVTW10057	DOJ	11/26/2019	10/31/2029	\$283,150.00
5	15BRRC20FVTW10062	DOJ	12/23/2019	4/30/2031	\$2,849,276.77
6	15BRRC21FWTW10054	DOJ	10/9/2020	4/30/2031	\$569,753.46
7	15M40021FA3500035	DOJ	2/3/2021	3/31/2028	\$0.00
8	15M40023FA3500005	DHS	9/29/2023	7/31/2026	\$105,537,685.50
9	15M40025FA3500009	DOJ	10/31/2024	10/31/2025	\$56,866,471.02
10	70B03C24C00000054	DHS	7/16/2024	6/30/2028	\$1,333,849.84
11	70CDCR18FR0000045	DHS	4/11/2018	10/11/2029	\$600.00
12	70CDCR23FR0000048	DHS	8/25/2023	9/15/2025	\$39,381,907.94
13	70CDCR24FC0000005	DHS	7/17/2024	7/22/2025	\$489,732.40
14	70CDCR24FR0000003	DHS	10/27/2023	9/27/2025	\$72,727,938.31
15	70CDCR24FR0000038	DHS	8/6/2024	8/5/2025	\$60,523,845.63
16	70CDCR24FR0000053	DHS	8/13/2024	9/30/2025	\$43,191,291.32
17	70CDCR24FR0000056	DHS	8/16/2024	8/17/2025	\$61,884,954.77
18	70CDCR25FC0000002	DHS	3/31/2025	3/31/2026	\$8,722,448.00
19	70CDCR25FR0000004	DHS	10/24/2024	3/27/2026	\$117,431,349.50
20	70CDCR25FR0000005	DHS	10/16/2024	10/15/2025	\$59,993,453.20
21	70CDCR25FR0000009	DHS	12/20/2024	12/19/2029	\$120,393,306.30
22	70CDCR25FR0000010	DHS	12/20/2024	12/19/2025	\$34,270,827.48
23	70CDCR25FR0000013	DHS	12/20/2024	12/19/2025	\$66,190,762.72
24	70CDCR25FR0000029	DHS	3/6/2025	4/10/2026	\$58,637,673.24
25	70CDCR25FR0000037	DHS	4/1/2025	3/19/2026	\$7,350,371.31

26	70CDCR25FR0000075	DHS	5/17/2025	5/16/2027	\$250.00
27	DJJODT7C0003	DOJ	4/20/2007	9/30/2030	\$820,829,956.00
28	DJJODT8C0005	DOJ	1/9/2008	2/19/2028	\$817,249,733.40
				<b>TOTAL</b>	<b>\$2,561,530,296.67</b>