

BEFORE THE FEDERAL ELECTION COMMISSION

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

v. MUR No. _____

KENTUCKY 4TH PAC and GARY BACKUS
in his official capacity as treasurer
7659 Mall Rd. #1024
Florence, KY 41042

TAMARACK ASPEN, INC.
2807 Allen Street #2145
Dallas, TX 75204

ANY UNKNOWN PERSON(S) who made a
contribution to Kentucky 4th PAC in the name
of Tamarack Aspen, Inc.

SUPPLEMENTAL COMPLAINT

1. On June 1, 2026, Campaign Legal Center and Sophia Gonsalves-Brown filed a complaint with the Federal Election Commission (the “FEC” or “Commission”) alleging that Kentucky 4th PAC (“KY4 PAC”), a super PAC that reported spending millions of dollars on independent expenditures (“IEs”) targeting the Republican primary election in Kentucky’s 4th congressional district, failed to file a required pre-primary election report.¹ On June 3, 2026, two days after CLC filed its complaint and two weeks *after* Kentucky’s May 19, 2026 primary, KY4 PAC filed that report, which was due 12 days *before* the primary, on May 7, 2026. That belated filing in no way cures KY4 PAC’s egregious violation of federal reporting requirements, which denied voters important campaign finance information they were legally entitled to have when casting their ballots.

¹ Compl., Campaign Legal Center (Jun. 1, 2026), <https://campaignlegal.org/document/clc-alleges-pop-pac-targeting-kentucky-primary-violated-federal-reporting-rules>.

2. Moreover, KY4 PAC’s late-filed pre-primary report disclosed that its sole source of funding—the purported source of over \$3.5 million—was an opaque corporate entity, “Tamarack Aspen, Inc.” (“TAI”), which was incorporated just three days before the super PAC registered with the Commission. TAI was incorporated in Delaware as a 501(c)(4) nonprofit corporation by an attorney in Dayton, OH; it disclosed a Dallas, TX mailing address that is the location of a FedEx shipping center, and has no public presence or known activities—yet it somehow gave KY4 PAC over \$3.5 million, which it began contributing to the super PAC only three weeks after it was formed. These facts provide reason to believe that TAI is merely a straw donor, a shell corporation formed and used for the sole purpose of unlawfully concealing the true source(s) of over \$3.5 million that KY4 PAC knowingly used to secretly finance its election-influence efforts in the Kentucky primary.
3. This supplemental complaint, which incorporates by reference all facts and allegations contained in the original complaint filed on June 1, 2026, is filed pursuant to 52 U.S.C. § 30109(a)(1) and is based on information and belief that KY4 PAC and Gary Backus in his official capacity as treasurer, Tamarack Aspen, Inc., and any unknown persons that contributed to KY4 PAC in the name of Tamarack Aspen, Inc., violated the Federal Election Campaign Act (“FECA” or the “Act”), 52 U.S.C. § 30101, *et seq.*²

SUPPLEMENTAL FACTS

4. KY4 PAC registered with the Commission as a super PAC on March 16, 2026, and Gary Backus is its treasurer.³

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

³ Kentucky 4th PAC, Statement of Org. at 1 (Mar. 16, 2026), <https://docquery.fec.gov/pdf/854/202603169853391854/202603169853391854.pdf>.

5. Tamarack Aspen, Inc. (“TAI”) was incorporated in Delaware as a 501(c)(4) nonprofit corporation on March 13, 2026—three days before KY4 PAC’s registration with the FEC—by Robert Berner.⁴ Its registered agent is “The Corporation Trust Company,” located at “1209 Orange Street, Corporation Trust Center, Wilmington, Delaware 19801.”⁵ Berner is an attorney based in Dayton, OH, and a member of the law firm Bailey Cavalieri.⁶
6. KY4 PAC reported spending nearly \$6.7 million to influence a primary election in Kentucky’s 4th congressional district, including about \$3.5 million that it reported spending during the pre-primary reporting period.⁷
7. KY4 PAC filed an April Quarterly Report on April 15, 2026, which covered the period through the end of March 2026; it disclosed no contributions and no disbursements.⁸
8. On June 3, 2026—*i.e.*, two days after the filing of the original complaint in this matter, which alleged that KY4 PAC had violated its reporting obligations by not filing a pre-primary election report—KY4 PAC filed a pre-primary election report for the Kentucky primary election, which was held on May 19, 2026.⁹

⁴ Tamarack Aspen, Inc., Certificate of Incorporation (Mar. 13, 2026) (attached as Ex. A).

⁵ *Id.*

⁶ Robert B. Berner, Bailey Cavalieri, <https://baileycav.com/professional/robert-b-berner/> (last viewed June 4, 2026).

⁷ Kentucky 4th PAC, *Independent Expenditures (24/48-Hour Reports)*, https://www.fec.gov/data/independent-expenditures/?data_type=processed&q_spender=C00943753&is_notice=true&most_recent=true&min_date=01%2F01%2F2025&max_date=12%2F31%2F2026 (last viewed June 4, 2026).

⁸ Kentucky 4th PAC, 2026 April Quarterly Report (Apr. 15, 2026), <https://docquery.fec.gov/pdf/081/202604159862947081/202604159862947081.pdf>.

⁹ Kentucky 4th PAC, 12-Day Pre-Primary Election Report (Jun. 3, 2026), <https://docquery.fec.gov/pdf/843/202606039870368843/202606039870368843.pdf>.

9. KY4 PAC’s pre-primary election report disclosed that the super PAC received all of its funding from TAI: it reported receiving five contributions totaling \$3,500,750 between April 1, 2026, and April 28, 2026, as shown in the following table.¹⁰

Reported Contributions from “Tamarack Aspen, Inc.” to Kentucky 4th PAC

Date	Amount
April 1, 2026	\$950,500
April 10, 2026	\$750,250
April 17, 2026	\$200,000
April 27, 2026	\$1,000,000
April 28, 2026	\$600,000
TOTAL	\$3,500,750

10. The address for TAI reported by KY4 PAC in connection with all five of TAI’s reported contributions is “2807 Allen Street #2145, Dallas, TX 75204,” which is the location of “Eagle Postal Center - Uptown,” a FedEx authorized shipping center.¹¹ TAI has no other known connection to Dallas, TX.
11. TAI appears to have engaged in no commercial or philanthropic activity and appears to have no physical or online presence: it has no known website, social media pages, or real-world facilities, nor is it registered in any relevant business databases:
- a. Searches on Google provide no results that originate from “Tamarack Aspen, Inc.” itself or that detail any activity by the company; the only relevant results relate solely to the contributions at issue in this complaint.¹²

¹⁰ *Id.* at 6–7.

¹¹ FedEx, FedEx Authorized Ship Center “Eagle Postal Uptown,” <https://local.fedex.com/en-us/tx/dallas/65290> (last viewed June 4, 2026); *see* Eagle Postal Center, Uptown Dallas, <https://eaglepostal.com/allenpayments/> (last viewed June 4, 2026).

¹² *See* Google.com, Search results for “Tamarack Aspen, Inc.,” <https://www.google.com/search?q=%22tamarack+aspen%2C+inc%22> (last visited Jun. 8, 2026).

- b. “Tamarack Aspen, Inc.” does not appear to have any account or page on Instagram, Facebook, or X (formerly known as Twitter.)
- c. There is no record of “Tamarack Aspen, Inc.” in searches with the Better Business Bureau,¹³ EDGAR,¹⁴ or the Dallas Regional Chamber of Commerce.¹⁵

SUMMARY OF THE LAW

12. 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.”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

¹³ See Better Business Bureau, <https://www.bbb.org/search/> (last visited Jun. 8, 2026).

¹⁴ U.S. Securities and Exchange Commission, EDGAR, <https://www.sec.gov/edgar/search/#/q=%2522tamarack%2520aspen%2522> (last visited Jun. 8, 2026).

¹⁵ See Dallas Regional Chamber, Search results for “Tamarack Aspen,” <https://www.dallaschamber.org/search-results/?orgname=%22Tamarack+Aspen%22&city=&state=&zipcode=> (last visited Jun. 8, 2026).

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.

¹⁸ *Id.*

¹⁹ *Id.*

Straw Donor Prohibition

13. 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.”²⁰
14. 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.”²¹
15. 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,²² and ensures that the public and regulators are fully informed about the true sources of political contributions and expenditures. Such transparency also enables voters to have the information necessary to

²⁰ 52 U.S.C. § 30122.

²¹ 11 C.F.R. § 110.4(b)(2)(i)-(ii).

²² *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).

evaluate candidates for office, “make informed decisions[,] and give proper weight to different speakers and messages.”²³

16. 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.²⁴ 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].”²⁵
17. In MUR 7903 (Tomfoolery LLC), the Commission found reason to believe that “Tomfoolery LLC,” a disregarded entity for federal tax purposes, and its single member, Thomas Chavez, violated Section 30122 when Chavez provided funds to the limited liability company (LLC) for it to make contributions in its name to a super PAC; the Commission found that “Tomfoolery was not the true source of the combined \$75,000 that it facially appeared to give to [the super PAC], but instead served as an instrument to convey Chavez’s funds to [the super PAC] without publicly disclosing his identity.”²⁶

²³ *Citizens United v. FEC*, 558 U.S. 310, 369–71 (2010).

²⁴ 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.”).

²⁵ *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).

²⁶ Factual and Legal Analysis at 7, MUR 7903 (Tomfoolery LLC, *et al.*) (Aug. 1, 2022), https://www.fec.gov/files/legal/murs/7903/7903_13.pdf.

The Commission subsequently entered into a conciliation agreement with Tomfoolery LLC and Chavez, which included a \$25,000 civil penalty.²⁷

18. Likewise, in MUR 6920 (American Conservative Union), the Commission conciliated a violation of FECA’s straw-donor prohibition against a 501(c)(4) nonprofit organization that acted as a straw donor by transmitting \$1.71 million to a super PAC; in conjunction with other respondents, the nonprofit agreed to pay a \$350,000 civil penalty.²⁸
19. In a 2022 criminal prosecution under the same provision, the Department of Justice obtained a guilty plea from Joseph Fuentes-Fernandez, a political operative, who admitted setting up two shell 501(c)(4) organizations to serve as straw donors by funneling money to a super PAC for which Fuentes-Fernandez served as president and treasurer, while keeping the true contributors concealed.²⁹ Fuentes-Fernandez was sentenced to serve 14 months in prison, while the super PAC was ordered to pay a \$150,000 fine and placed on probation for three years.³⁰

²⁷ See Conciliation Agreement ¶ VI, MUR 7903 (Tomfoolery LLC, *et al.*) (Oct. 3, 2022), https://www.fec.gov/files/legal/murs/7903/7903_16.pdf. Subsequently, the Commission has refused to enforce FECA’s prohibition on contributions in the name of another in connection with contributions by single-member and partnership LLCs, opting instead to treat such contributions as potential reporting violations under the rules regarding the attribution of LLC contributions. See Statement of Reasons of Commissioners Shana Broussard, Allen Dickerson, Dara Lindenbaum, and Trey Trainor at 2, MURs 7981, *et al.* (Freedom Forward Fund) (Sep. 13, 2024), https://www.fec.gov/files/legal/murs/7981/7981_25.pdf (“In these Matters, the Commission received a range of complaints alleging . . . that these were contributions in the name of another—that is, straw donations. We disagreed . . . [and] believe these matters are better understood as failures to correctly attribute these contributions).

²⁸ See Conciliation Agreement ¶ IV.6–IV.9, MUR 6920 (American Conservative Union, *et al.*) (Oct. 31, 2017), <https://www.fec.gov/files/legal/murs/6920/17044434756.pdf>.

²⁹ See Press Release, *Super PAC and Its President Plead Guilty to Dark Money Scheme to File False Reports with the FEC*, Dep’t of Justice (May 5, 2022), <https://www.justice.gov/usao-pr/pr/super-pac-and-its-president-plead-guilty-dark-money-scheme-file-false-reports-fec>.

³⁰ Press Release, *President and Treasurer of Super PAC Sentenced for Dark Money Scheme*, Dep’t of Justice (Aug. 26, 2022), <https://www.justice.gov/archives/opa/pr/president-and-treasurer-super-pac-sentenced-dark-money-scheme>.

20. As these and other prior cases illustrate, straw donor contributions like those alleged here are serious violations of federal campaign finance law.³¹ FECA's 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, committees, federal regulators, and the public are informed of the true sources of money spent to influence federal elections.³² Indeed, straw donor schemes have previously been used to skirt FECA's source prohibitions, such as the ban on contributions by government contractors³³ and foreign nationals.³⁴
21. 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 See 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 See 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>.

³⁴ See Press Release, *Political Consultant Convicted for Scheme Involving Illegal Foreign Campaign Contribution to 2016 Presidential Campaign*, Dep't of Justice (Nov. 17, 2022), <https://www.justice.gov/archives/opa/pr/political-consultant-convicted-scheme-involving-illegal-foreign-campaign-contribution-2016>.

SUPPLEMENTAL CAUSE OF ACTION

COUNT II:

TAMARACK ASPEN INC., KENTUCKY 4TH PAC, AND UNKNOWN PERSONS VIOLATED FECA'S PROHIBITION ON CONTRIBUTIONS IN THE NAME OF ANOTHER, 52 U.S.C. § 30122

22. KY4 PAC reported spending nearly \$6.7 million to influence a primary election in Kentucky's 4th congressional district, including about \$3.5 million that it reported spending during the pre-primary reporting period.³⁵ As alleged in the original complaint, KY4 PAC's IE spending during Kentucky's pre-primary election period triggered an obligation to file a pre-primary election report, which the super PAC did not file.³⁶
23. On June 3, 2026, KY4 PAC belatedly filed the pre-primary election report that was due nearly one month earlier, on May 7, 2026, 12 days *before* the primary. This report disclosed for the first time the source of the \$3.5 million that the super PAC used to finance its IEs targeting Kentucky's 4th congressional district during the pre-primary reporting period.³⁷
24. That report indicated that TAI was the super PAC's *only* source of funding; within a four-week period from April 1, 2026, through April 28, 2026, KY4 PAC received five contributions totaling \$3,500,750 from TAI,³⁸ which was incorporated in Delaware on March 13, 2026—just *three days* before KY4 PAC registered as a super PAC.³⁹

³⁵ Kentucky 4th PAC, *Independent Expenditures (24/48-Hour Reports)*, https://www.fec.gov/data/independent-expenditures/?data_type=processed&q_spender=C00943753&is_notice=true&most_recent=true&min_date=01%2F01%2F2025&max_date=12%2F31%2F2026 (last viewed June 4, 2026).

³⁶ See Compl., *supra* note 1.

³⁷ Kentucky 4th PAC, 12-Day Pre-Primary Election Report (Jun. 3, 2026), <https://docquery.fec.gov/pdf/843/202606039870368843/202606039870368843.pdf>. KY4 PAC had previously filed an April Quarterly Report disclosing no contributions and no disbursements through the end of March 2026. See Kentucky 4th PAC, 2026 April Quarterly Report (Apr. 15, 2026), <https://docquery.fec.gov/pdf/081/202604159862947081/202604159862947081.pdf>.

³⁸ Kentucky 4th PAC, 12-Day Pre-Primary Election Report (Jun. 3, 2026), <https://docquery.fec.gov/pdf/843/202606039870368843/202606039870368843.pdf>.

³⁹ Tamarack Aspen, Inc., Certificate of Incorporation (Mar. 13, 2026) (attached as Ex. A).

25. Moreover, in the three weeks between TAI’s incorporation and the first of its six- and seven-figure super PAC contributions, it appears to have engaged in no activity whatsoever. TAI was incorporated by an attorney based in Dayton, OH; it has a corporate registered agent (the Corporation Trust Company) based in Delaware; and the address it provided in connection with its reported contributions to KY4 PAC is a FedEx shipping center in Dallas, TX.⁴⁰ It has no other known real-world or online presence, nor is it registered in any business databases.⁴¹ These facts collectively indicate that TAI exists only on paper, with no actual operations or activities that might permit it to generate sufficient funds to make the \$3.5 million in contributions reported in its name.
26. FECA prohibits making or knowingly using one’s name to be used to make a contribution in the name of another.⁴² In other words, no person—including a corporate “person”—can legally make political contributions with funds that have been provided to it by another for that purpose.⁴³ It is difficult to conceive of how a newly formed corporation like TAI, with no operations, activities, or presence anywhere, could have contributed over \$3.5 million to a super PAC within a four-week period, unless one or more other persons provided funds to it for that purpose. The fact that TAI was formed immediately before KY4 PAC, which received and almost immediately spent TAI’s purported contributions to make IEs, further indicates that the two entities were likely created as part of an overarching plan to secretly spend money influencing the primary election in Kentucky’s fourth congressional district.

⁴⁰ See *supra* ¶¶ 10–11.

⁴¹ See *supra* notes 12–15 and associated text.

⁴² 52 U.S.C. § 30122.

⁴³ See 11 C.F.R. § 110.4(b)(2)(i).

27. Moreover, there is reason to believe KY4 PAC also knowingly accepted these contributions in the name of another. KY4 PAC reported receiving every dollar that it used to make IEs from TAI; it had no other reported source of funding.⁴⁴ It is difficult to conceive of how any political committee could *not* know the true provenance of its funding when all of its funding comes from a single entity—particularly when that entity was formed three days before the super PAC itself. These circumstances make abundantly clear that the super PAC knew, or reasonably should have known, that the contributions it reported receiving from TAI were, in fact, provided by other persons who were funneling the money through TAI to conceal their identities.
28. Viewed as a whole, there is ample factual basis to find reason to believe that one or more unknown persons advanced funds to TAI for the purpose of enabling it to “make” contributions to KY4 PAC in its own name—thereby concealing the true contributors’ identities. Indeed, the available information indicates that absent the provision of these funds, TAI would not have been able to contribute over \$3.5 million to the super PAC, which, in turn, would then have been unable to make \$3.5 million in IEs during Kentucky’s pre-primary reporting period. There is, therefore, reason to believe this straw donor scheme—viewed in conjunction with KY4 PAC’s formation and IE spending, which were strategically timed in an obvious attempt to avoid public disclosure—was aimed at deliberately denying Kentucky voters basic transparency about who was spending money to influence their vote.

⁴⁴ *See supra* notes 8–9.

29. Accordingly, there is reason to believe that unknown persons made, TAI knowingly permitted its name to be used to make, and KY4 PAC knowingly accepted, contributions in the name of another in violation of 52 U.S.C. § 30122.

PRAYER FOR RELIEF

30. Wherefore, the Commission should find reason to believe that Kentucky 4th PAC and Gary Backus in his official capacity as treasurer, Tamarack Aspen, Inc., and the unknown person(s) who contributed to KY4 PAC in TAI's name violated 52 U.S.C. § 30101 *et seq.*, and conduct an immediate investigation under 52 U.S.C. § 30109(a)(2).
31. Further, the Commission should seek appropriate sanctions for any and all violations, including civil penalties sufficient to deter future violations and an injunction prohibiting the respondents from any and all violations in the future, and should seek such additional remedies as are necessary and appropriate to ensure compliance with FECA.

Respectfully submitted,

/s/ Saurav Ghosh
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1101 14th Street NW, Suite 400
Washington, DC 20005
Counsel to the Campaign Legal Center,
Sophia Gonsalves-Brown

June 9, 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

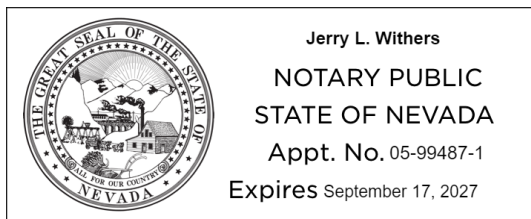
Sophia Gonsalves-Brown

State of Nevada, County of Clark

Sworn to and subscribed before me this 9th day of June 2026.

Jerry L. Withers

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

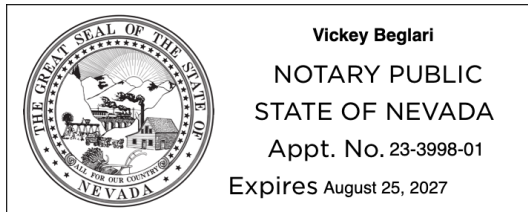
Saurav Ghosh

Saurav Ghosh, Esq.

Sworn to and subscribed before me this 9th day of June 2026.
State of Nevada, Clark County

Vickey Beglari

Notary Public



Notarized remotely using audio-video communication technology via Proof.


Exhibit A

**STATE OF DELAWARE CERTIFICATE OF
INCORPORATION A NON-STOCK
CORPORATION**

The undersigned Incorporator hereby certifies as follows:

1. The name of the Corporation is Tamarack Aspen, Inc.
2. The Registered Office of the corporation in the State of Delaware is located at 1209 Orange Street, Corporation Trust Center, Wilmington, Delaware, 19801, New Castle County. The name of the Registered Agent at such address upon whom process against this corporation may be served is The Corporation Trust Company.
3. The purpose of the corporation is to engage in any lawful act or activity for which corporations may be organized under the General Corporation Law of Delaware. This Corporation shall be a nonprofit corporation.
4. This corporation is organized exclusively for the purposes set forth under section 501(c)(4) of the Internal Revenue Code, or the corresponding section of any future federal tax code.
5. The corporation shall not have any capital stock.
6. The conditions of membership are set forth in the bylaws.
7. The name and mailing address of the incorporator are as follows:

Name: Robert Berner
Mailing Address: 409 E. Monument Avenue, Suite 103, Dayton, OH 45402

By: 
Its: Incorporator
Name: Robert Berner