

BEFORE THE FEDERAL ELECTION COMMISSION

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

v. MUR No. _____

MILE HIGH ACCOUNTABILITY PROJECT
and DAVID SCOTT MARTINEZ in his
official capacity as treasurer
1401 Arapahoe Street, Floor 10
Denver, CO 80202

COMPLAINT

1. Mile High Accountability Project (“MHAP”) is a pop-up super PAC¹ that has reported spending \$350,000 on digital ads supporting Rep. Diana DeGette in the Democratic primary for Colorado’s first congressional district. However, it has failed to comply with its federal reporting obligations under the Federal Election Campaign Act (“FECA”). First, MHAP has failed to file a pre-primary election report by the applicable June 18, 2026, deadline. Second, the only disclosure MHAP has filed to date—a half-page independent expenditure (“IE”) report disclosing its sponsorship of the purportedly pro-DeGette digital ads—was riddled with errors that dramatically reduced the report’s value to voters seeking to understand MHAP’s activities.
2. Colorado’s primary elections will be held on June 30, 2026. MHAP’s failure to comply with its reporting requirements leaves voters heading to the polls without full information about MHAP’s election spending or who provided it with the money to make over a

¹ Pop-up super PACs are a type of political committee that strategically game federal reporting deadlines to avoid publicly disclosing information about their sources of funding until after the election(s) they are spending money to influence. See Carolyn Daly, “Pop-up” Super PACs Game the System to Leave Voters in the Dark, Campaign Legal Ctr. (Jun. 4, 2024), <https://campaignlegal.org/update/pop-super-pacs-game-system-leave-voters-dark>; see also Compl., MUR 8481 (Lead Left PAC) (May 14, 2026), <https://campaignlegal.org/document/pop-super-pac-illegally-concealed-political-ad-spending-clc-alleges> (alleging that a pop-up super PAC violated federal reporting requirements).

quarter of a million dollars in IEs during the final weeks before the primary elections. By failing to file a pre-primary report, and providing incomplete and inaccurate information on its IE report, MHAP is depriving voters of crucial electoral information they had a right to know before casting their ballots.

3. This complaint is filed pursuant to 52 U.S.C. § 30109(a)(1) and is based on information and belief that MHAP and David Scott Martinez in his official capacity as treasurer violated FECA, 52 U.S.C. § 30101, *et seq.*²

FACTS

4. MHAP registered with the Federal Election Commission (the “FEC” or “Commission”) as a super PAC on April 29, 2026.³ It named David Scott Martinez as its treasurer and listed 1601 Arapahoe Street, Floor 10, Denver, Colorado 80202 as its address.⁴ That street address belongs to Martinez and Partners, LLC, a law firm headed by D. Scott Martinez that “support[s] client interests at the intersection of law, government and industry.”⁵ Martinez, who thus appears to lead the law firm and act as MHAP’s treasurer, does not serve as the treasurer of any other federal political committee.⁶
5. One June 8, 2026, just over a month after it registered with the FEC, MHAP filed a 24/48-hour report of independent expenditures (“IEs”),⁷ *i.e.*, a report triggered by paying

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

³ MHAP, Statement of Org. at 1 (Apr. 29, 2026), <https://docquery.fec.gov/pdf/536/202604299866728536/202604299866728536.pdf>.

⁴ *Id.*

⁵ *About Us*, Martinez & Partners, <https://www.martinezandpartners.com/about/the-firm> (last visited June 22, 2026); *D. Scott Martinez*, Martinez & Partners, <https://www.martinezandpartners.com/about/scott-martinez> (last visited June 22, 2026).

⁶ *See Most Recent Treasurer (“David Martinez” or “Scott Martinez”)*, FEC, https://www.fec.gov/data/committees/?treasurer_name=david+martinez&treasurer_name=scott+martinez (last visited June 22, 2026).

⁷ MHAP, 24/48 Hour Report of Independent Expenditures (June 8, 2026), <https://docquery.fec.gov/pdf/249/202606089870439249/202606089870439249.pdf> (“MHAP IE Report”).

for independent 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.⁸ The report stated that, on June 6, 2026, MHAP spent \$350,000 on digital advertisements supporting Rep. Diana DeGette in the primary election for Colorado’s first congressional district.⁹

6. MHAP’s IE report contained multiple errors.
 - a. MHAP labeled its report a “24-hour report,” even though the 24-hour reporting period for the Colorado primary had not yet opened.¹⁰ Rather, June 8—the day MHAP filed the report—fell within Colorado’s 48-hour reporting period for disclosing IEs.¹¹
 - b. Although the IE report includes a field for indicating the date MHAP began publicly disseminating its IEs, MHAP left that field blank.¹²
 - c. MHAP reported that its ads supported Rep. Diana DeGette, when the group’s only available digital ads are attacking one of her opponents, Melat Kiros. Digital ad archive data shows that MHAP ran ads on Meta’s platforms from June 9 to June 21.¹³ The ads all feature text stating that Kiros is “divid[ing] Denver Democrats,” supporting controversial policies, and has made statements that the *Denver Post* called “offensive” and “laced with

⁸ 52 U.S.C. §§ 30101(17), 30104(g)(1); 11 C.F.R. §§ 100.16, 104.4(c).

⁹ MHAP IE Report.

¹⁰ *Id.*; see 52 U.S.C. § 30104(g)(1)–(2); 11 C.F.R. § 104.4(b)–(c); see also *2026 Election Calendar*, Colo. Sec’y of State, <https://www.sos.state.co.us/pubs/elections/calendars/2026ElectionCalendar.pdf> (last updated Dec. 17, 2025).

¹¹ See *supra* note 10.

¹² MHAP IE Report.

¹³ See *Mile High Accountability Project*, Meta Ad Library, [https://www.facebook.com/ads/library/?active_status=all&ad_type=all&country=US&id=36040973908882878&is_targeted_country=false&media_type=all&search_type=page&sort_data\[mode\]=total_impressions&sort_data\[direction\]=desc&view_all_page_id=1083828884821282](https://www.facebook.com/ads/library/?active_status=all&ad_type=all&country=US&id=36040973908882878&is_targeted_country=false&media_type=all&search_type=page&sort_data[mode]=total_impressions&sort_data[direction]=desc&view_all_page_id=1083828884821282) (last visited June 22, 2026) (“Meta Ad Archive”).

antisemitism.”¹⁴ Some of the ads feature a video further attacking Kiros, while others include still images listing her disqualifying traits.¹⁵ All of the ads link to MHAP’s website, which is just a 30-second anti-Kiros video and a form to sign-up for text message updates.¹⁶ Just three out of the twenty-seven Meta ads with available creative even mention Rep. DeGette, and the text of those ads are still focused on opposing Kiros.¹⁷

- d. MHAP also disseminated its ads on Google’s platforms from June 11 to June 24.¹⁸ The ads are the same as the Meta ads, except they lack the text, *i.e.*, they are just the videos and still images, with a link to MHAP’s website.¹⁹ Again, only two of the twenty Google ads even mention Rep. DeGette, and those references appear beside negative statements about Kiros.²⁰
- e. The ad archives disclose that MHAP spent a total of \$138,800 to \$181,284 to place ads on Meta and Google’s platforms.²¹ The ads referencing Rep. DeGette accounted for less than \$6,000 of this figure.²² Representative samples of the ads appear below:

¹⁴ *See id.*

¹⁵ *See id.* The video ads contain a 30-second video or one of two variants of a 15-second video. *See id.* The 15-second videos are cuts of the 30-second video. *See id.* MHAP posted the three videos to its YouTube page. *Mile High Accountability*, YouTube, <https://www.youtube.com/@MileHighAccountability> (last visited June 23, 2026).

¹⁶ *See* Meta Ad Archive; Mile High Accountability, <https://milehighaccountability.com/> (last visited June 23, 2026).

¹⁷ *See* Meta Ad Archive.

¹⁸ *Mile High Accountability Project*, Google Ads Transparency Center, <https://adstransparency.google.com/advertiser/AR01362097346908782593?region=US&topic=political> (last visited June 25, 2026) (“Google Ad Archive”).

¹⁹ *See id.*

²⁰ *See id.*

²¹ *See id.*; Meta Ad Archive.

²² *See* Google Ad Archive; Meta Ad Archive.

Mile High Accountability Project
 Sponsored • Paid for by Mile High Accountability.
 Not authorized by any candidate or candidate...

Melat Kiros wants to divide Denver Democrats. A Denver Post column called her statements offensive and laced with antisemitism. Kiros supports abolishing police, withdrawing from NATO, and is backed by groups tied to controversial rhetoric. Denver deserves better,

Melat Kiros
Just moved to Denver
Backed by Groups that want to:
1. Abolish the US Senate
2. Defund police
3. Leave NATO

[Learn More](#)

Paid for by Mile High Accountability Project. Not authorized by any candidate or candidate committee.

Who Is Melat Kiros?
 Learn the facts before you vote.

[Learn More](#)

Mile High Accountability Project
 Sponsored • Paid for by Mile High Accountability.
 Not authorized by any candidate or candidate...

Melat Kiros wants to divide Denver Democrats. A Denver Post column called her statements offensive and laced with antisemitism. Kiros supports abolishing police, withdrawing from NATO, and is backed by groups tied to controversial rhetoric. Denver deserves better,

Diana DeGette
is leading the fight against Donald Trump to protect abortion rights as the Co-Chair of the Reproductive Freedom Caucus.

[Learn More](#)

Paid for by Mile High Accountability Project. Not authorized by any candidate or candidate committee.

Who Is Melat Kiros?
 Learn the facts before you vote.

[Learn More](#)



7. MHAP has elected to file disclosure reports on a quarterly reporting schedule,²³ which means it must file (a) four quarterly reports, (b) pre-election reports for any primary or general elections on which it spends money during the pre-election reporting period, and (c) a post-general report.²⁴ Colorado’s pre-primary reporting period was April 1 to June 10, 2026, with reports due June 18, 2026.²⁵ MHAP spent money during this window—\$350,000 on June 6, 2026, for IEs²⁶—but did not file a pre-primary report.²⁷

²³ MHAP, FEC, <https://www.fec.gov/data/committee/C00948828/?tab=filings> (last visited June 23, 2026).
²⁴ 52 U.S.C. § 30104(a)(4)(A); 11 C.F.R. § 104.5(c)(1).
²⁵ Primary Election Report Notice – Colorado, FEC, <https://www.fec.gov/help-candidates-and-committees/dates-and-deadlines/2026-reporting-dates/prior-notices-2026/election-report-notice-colorado/> (last visited June 23, 2026).
²⁶ MHAP IE Report.
²⁷ See MHAP, FEC, *supra* note 23.

8. MHAP did not have to file an April quarterly report because it registered on April 29, after the close of the April quarterly reporting period (January 1–March 31, 2026).²⁸ Its next quarterly report, covering April 1 to June 30, 2026, is due on July 15, 2026.²⁹ Colorado’s primary elections will occur on June 30, 2026, before that date.³⁰ Accordingly, the pre-primary report was the only opportunity for voters to learn about MHAP’s sources of funding and gain a complete picture of MHAP’s spending before the primary elections.
9. The Democratic primary for Colorado’s first congressional district, pitting longtime Congresswoman DeGette against Democratic Socialist challenger Melat Kiros, has garnered national attention as a race that could help dictate the direction of the Democratic Party.³¹ Outside spending has reached nearly \$1.5 million, and the anonymous nature of much of that spending has vexed Colorado voters.³² As the first congressional district is heavily Democratic, the June 30th primary is the key election for determining who will represent the district in Congress next term.³³ Transparency at this

²⁸ See MHAP, Statement of Org., *supra* note 3, at 1; *2026 Quarterly Reports*, FEC, <https://www.fec.gov/help-candidates-and-committees/dates-and-deadlines/2026-reporting-dates/2026-quarterly-filers/> (last visited June 23, 2026).

²⁹ *2026 Quarterly Reports*, *supra* note 28.

³⁰ *2026 Election Calendar*, *supra* note 10.

³¹ See Mamdani Emerges as Kingmaker, and Other Takeaways from Tuesday’s Primaries, Wash. Post (June 24, 2026), <https://www.washingtonpost.com/politics/2026/06/25/mamdani-emerges-tuesday-primaries-big-winner-other-takeaways/>.

³² See Jesse Paul, *Super PACs Drop \$1.3M in Last-Minute Spree to Protect Diana DeGette in Denver’s Congressional District*, Colo. Sun (June 19, 2026), <https://coloradosun.com/2026/06/19/diana-degette-melat-kiros-pac-spending/>; Chase Woodruff, *How Mysterious Super PACs and ‘Redboxing’ Are Influencing Colorado’s Democratic Primaries*, Colo. Newsline (June 23, 2026), <https://coloradonewsline.com/2026/06/23/super-pacs-redboxing-colorado-democratic-primaries/>.

³³ See Esteban L. Hernandez, *1-Minute Voter Guide: Democratic 1st Congressional District Candidates*, Axios (June 23, 2026), <https://www.axios.com/local/denver/2026/06/23/voter-guide-colorado-democrats-1st-congressional-district>.

juncture—not after the primary and in the leadup to the general—was particularly critical.

SUMMARY OF THE LAW

10. 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.”³⁴ The reason-to-believe finding is a threshold determination and “does not establish that the law has been violated.”³⁵ The Commission uses the ensuing investigation “to determine whether a violation in fact occurred and, if so, its exact scope.”³⁶ 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.³⁷

Required Election-Year Reporting

11. FECA requires each treasurer of a political committee to file disclosure reports with the Commission, including regular periodic reports that disclose, *inter alia*, the committee’s aggregate receipts and disbursements, as well as detailed information about any contributions aggregating in excess of \$200 within a calendar year (for any committee that is not an authorized committee of a federal candidate).³⁸

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

³⁵ 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.

³⁶ *Id.*

³⁷ *Id.*

³⁸ 52 U.S.C. § 30104(a), (b).

12. In particular, all committees other than authorized committees are required to file periodic reports either quarterly or monthly; during an election year, committees that elect to file quarterly must also file, *inter alia*, a pre-election report “no later than the 12th day before . . . any election in which the committee makes a contribution to or expenditure on behalf of a candidate in such election, and which shall be complete as of the 20th day before the election.”³⁹ Commission regulations further provide that such pre-election reports “shall be filed by a political committee which makes contributions or expenditures in connection with any such election if such disbursements have not been previously disclosed” and “shall disclose all receipts and disbursements as of the 20th day before a primary or general election.”⁴⁰
13. The Commission provides state-by-state guides for election-year reporting on its website; as relevant here, Colorado’s 2026 pre-primary election reporting period ran from April 1, 2026, through June 10, 2026, with pre-primary reports due by June 18, 2026.⁴¹

IE Reporting

14. In addition to filing regular reports, political committees must also file event-driven reports to disclose real-time information about IEs. Under FECA, when any person makes or contracts to make IEs aggregating \$1,000 or more after the 20th day preceding,

³⁹ *Id.* § 30104(a)(4)(A)(ii). Committees that elect to file disclosure reports on a monthly reporting schedule are not required to file additional reports during an election year. *See id.* § 30104(a)(4)(B); 11 C.F.R. § 104.5(c); *Monthly filers (Election-Year)*, FEC, <https://www.fec.gov/help-candidates-and-committees/filing-pac-reports/nonconnected-committee-monthly-filers/> (last visited June 24, 2026) (“Monthly filers don’t have to file pre-primary or special election reports.”). A political committee “may change the frequency of its reporting” from quarterly to monthly (or vice versa) upon notifying the Commission in writing, but may do so “no more than once per calendar year.” 11 C.F.R. § 104.5(c).

⁴⁰ 11 C.F.R. § 104.5(c)(1)(ii).

⁴¹ *Primary Election Report Notice – Colorado*, *supra* note 25 (stating that “PACs and party committees filing on a quarterly basis in 2026 are subject to pre-election reporting if they make previously undisclosed contributions or expenditures (including independent expenditures) in connection with an election by the close of books of the applicable report(s)”).

but more than 24 hours before, the date of an election, that person must file a report describing those expenditures within 24 hours (a “24-hour report”).⁴² Further, any person that makes or contracts to make IEs aggregating \$10,000 or more outside of that 20-day period, up to and including the 20th day, must file a report describing those expenditures within 48 hours (a “48-hour report”).⁴³

15. These 24/48-hour reports must identify the candidate who is the subject of the IE, including stating the election in which the candidate is running; indicate whether the IE supports or opposes that candidate; state the date the committee began disseminating the IE; and identify any person that received more than \$200 in connection with the IE, including the amount, purpose, and date of the expenditure.⁴⁴ The report form also includes a place to check whether the report is a 24- or 48-hour report and whether it is the original or an amended report.⁴⁵

CAUSES OF ACTION

COUNT I:
MHAP VIOLATED 52 U.S.C. § 30104(A) BY FAILING TO FILE
A REQUIRED PRE-PRIMARY ELECTION REPORT

16. MHAP has reported spending \$350,000 to influence a primary election in Colorado’s first congressional district during the pre-primary reporting period.⁴⁶ As such, MHAP was required to file a pre-primary election report, and because it has not filed that

⁴² 52 U.S.C. § 30104(g)(1); 11 C.F.R. § 109.10(d).

⁴³ 52 U.S.C. § 30104(g)(2); 11 C.F.R. § 104.4(b)(2).

⁴⁴ 52 U.S.C. § 30104(g)(3)(B), *cross-referencing id.* § 30104(b)(6)(B)(iii); 11 C.F.R. § 104.4(b)–(c), *cross-referencing id.* § 104.3(b)(3)(vii); *see also* *FEC Form 3X Instructions for Schedule E (Itemized Independent Expenditures)*, FEC, <https://www.fec.gov/resources/cms-content/documents/policy-guidance/fecfrm3xei.pdf> (rev. May 2016).

⁴⁵ *FEC Form 3X Instructions for Schedule E (Itemized Independent Expenditures)*, *supra* note 44.

⁴⁶ *See* MHAP IE Report; *Primary Election Report Notice – Colorado*, *supra* note 25.

required report, there is reason to believe MHAP has violated its reporting obligations under FECA.

17. FECA makes clear that a committee that elects to file disclosure reports on a quarterly reporting schedule must, during an election year like 2026, also file a pre-primary election report if it “makes a contribution to or expenditure on behalf of a candidate in such election.”⁴⁷ Commission regulations explain further that such a pre-election report is required when a committee “makes contributions or expenditures in connection with any such election if such disbursements have not been previously disclosed.”⁴⁸
18. Because MHAP reported making \$350,000 in IEs during the Colorado pre-primary reporting period, there is reason to believe that it made expenditures that “have not been previously disclosed” on a regularly filed disclosure report, thus triggering the pre-primary reporting requirement.⁴⁹ As MHAP elected to file disclosure reports on a quarterly reporting schedule, which includes pre- and post-election reporting

⁴⁷ 52 U.S.C. § 30104(a)(4)(A)(ii).

⁴⁸ 11 C.F.R. § 104.5(c)(1)(ii).

⁴⁹ *Id.* “[P]reviously disclosed” plainly refers to a committee’s regularly filed disclosure reports, not the “special additional reporting procedures” that apply to certain independent expenditures. *See Instructions for FEC Form 3X and Related Schedules*, FEC, <https://www.fec.gov/resources/cms-content/documents/policy-guidance/fecfrm3xei.pdf> (rev. May 2016) (noting that “[w]hen the cost of an independent expenditure is not known at the time of dissemination,” filers may “estimate the cost” on a 24/48-hour report, and then must subsequently “report the actual payment on Schedule E” of their next regularly filed report). Interpreting “previously disclosed” to include 24- and 48-hour reports would carve out from “expenditures in connection with any such election” any IEs that trigger reporting under 52 U.S.C. § 30104(g)—*i.e.*, IEs aggregating in excess of \$10,000, 20 or more days before an election (a timeframe that overlaps with the pre-primary reporting window, which ends 20 days before a primary). There is no support for such a reading. *Cf.* Conciliation Agreement ¶¶ IV.9, V, MURs 7438/7476 (Ohio First PAC) (Sep. 2, 2021), https://www.fec.gov/files/legal/murs/7438/7438_13.pdf (conciliating violations arising from a super PAC’s failure to file required 48-hour IE reports and a required pre-primary election report); Factual and Legal Analysis at 7, MURs 7321, *et al.* (Keep El Paso Honest) (Jun. 14, 2019), https://www.fec.gov/files/legal/murs/7321/7321_05.pdf (finding reason to believe super PAC violated FECA’s reporting requirements by failing to file, *inter alia*, a pre-primary election report). Moreover, FECA itself simply mandates the filing of a pre-election report in connection with “any election in which the committee makes a contribution to or expenditure on behalf of a candidate in such election.” 52 U.S.C. § 30104(a)(4)(A)(ii). Thus, to the extent MHAP argues that its IEs during the pre-primary reporting period were “previously disclosed” on 24/48-hour IE reports, such an argument lacks support in the law.

requirements,⁵⁰ MHAP was required to file a pre-primary election report by June 18, 2026—yet it has to date not filed such a report.

19. In addition to triggering the pre-primary reporting requirement, MHAP’s digital ad campaign during the pre-primary reporting period also indicates that it received contributions that it has yet to report; indeed, MHAP has never disclosed its funding sources, as it has not filed any disclosure reports.⁵¹
20. Thus, MHAP’s failure to file a required disclosure report deprived voters of timely information about who supplied over a quarter of a million dollars targeting the Democratic primary in Colorado’s first congressional district, a race that has garnered national attention and that will effectively determine control of a congressional seat.⁵² As such, MHAP’s operation as an opaque election spending vehicle presents a major affront to the basic transparency that FECA mandates.
21. Accordingly, there is reason to believe that MHAP has violated, and continues to violate, 52 U.S.C. § 30104 by failing to file a required pre-primary election report, thereby denying the public important information about primary election spending in Colorado’s first congressional district.

COUNT II:
MHAP VIOLATED 52 U.S.C. § 30104(G) BY FAILING TO FILE
A COMPLETE AND ACCURATE IE REPORT

22. The harm caused by MHAP’s failure to file a pre-primary report is compounded by the fact that the only disclosure it has filed—an IE report—was riddled with inaccuracies and omissions. Voters seeking information about MHAP’s activities would be hard pressed to

⁵⁰ See 52 U.S.C. § 30104(a)(4)(A)(ii); *MHAP*, FEC, *supra* note 23.

⁵¹ See *MHAP*, FEC, *supra* note 23.

⁵² See *supra* ¶ 9.

use the IE report to understand what advertisements the group has been running in Colorado's first congressional district.

23. MHAP's IE report states that MHAP disseminated digital ads supporting Rep. DeGette.⁵³ However, the overwhelming majority of MHAP's ads did not even reference Rep. DeGette.⁵⁴ The ads attacked one of Rep. DeGette's opponents, Melat Kiros.⁵⁵ Even in the few ads that mentioned Rep. DeGette, the focus was still on telling voters why Kiros is unfit for office, and there were links to a Kiros attack ad on MHAP's website.⁵⁶ Political committees filing IE reports are required to name the candidate referenced in their ads and state whether the ads supported or opposed that candidate.⁵⁷ By reporting that the digital ads supported Rep. DeGette, rather than opposed Kiros, MHAP violated this requirement.
24. MHAP also failed to state on its IE report when it began disseminating the digital ads, as required by the FEC.⁵⁸ With incorrect information about the subject of the ads, and no information about when the ads started running, voters turning to MHAP's IE report to obtain information about the digital ads they saw on Meta and Google's platforms would rightfully struggle to connect the dots.
25. On top of these errors, which materially compromised transparency regarding MHAP's electoral activities, MHAP also represented that it was filing a 24-hour report, when in fact it was filing a 48-hour report.⁵⁹

⁵³ MHAP IE Report.

⁵⁴ *See supra* ¶ 6(c)–(e).

⁵⁵ *See supra* ¶ 6(c)–(e).

⁵⁶ *See supra* ¶ 6(c)–(e).

⁵⁷ 11 C.F.R. § 104.3(b)(3)(vii)(B).

⁵⁸ *See FEC Form 3X Instructions for Schedule E (Itemized Independent Expenditures)*, *supra* note 44.

⁵⁹ *See* MHAP IE Report; *see also* 52 U.S.C. § 30104(g)(2); 11 C.F.R. § 104.4(b)(2); *2026 Election Calendar*, *supra* note 10.

26. MHAP's multiple errors on a half-page form show that the super PAC did not take its duty to inform voters about its electoral spending seriously.⁶⁰ The public depends on IE reports to understand, in real time, how groups are attempting to influence their vote. By failing to comply with three separate requirements when filing its IE report—on top of simply failing to file a pre-primary report—MHAP deprived voters of information to which they had a statutory right.
27. As such, there is reason to believe that MHAP violated 52 U.S.C. § 30104(g) by filing an inaccurate IE report.

⁶⁰ MHAP's failure to include a proper federal disclaimer on its website and ads also supports this conclusion. *See supra* note 16.

PRAYER FOR RELIEF

28. Wherefore, the Commission should find reason to believe that MHAP and David Scott Martinez in his official capacity as treasurer violated 52 U.S.C. § 30101 *et seq.*, and conduct an immediate investigation under 52 U.S.C. § 30109(a)(2).
29. 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/ Shanna (Reulbach) Ports
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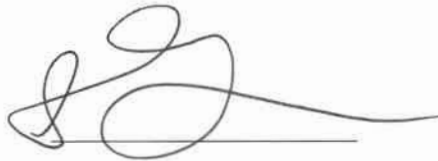
June 25, 2026

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

Sworn to and subscribed before me this 25th day of June 2026.



Notary Public



VERIFICATION

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

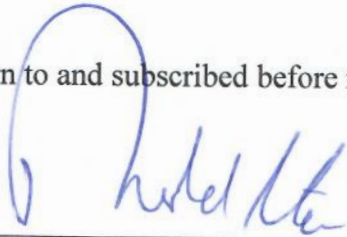
Sworn pursuant to 18 U.S.C. § 1001.

For Complainant Campaign Legal Center



Shanna (Reulbach) Ports, Esq.

Sworn to and subscribed before me this 21th day of June 2026.



Notary Public

