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
1601 Arapahoe Street, Floor 10
Denver, CO 80202

U.S. ACCOUNTABILITY PROJECT, INC.
16192 Coastal Hwy
Lewes, DE 19958

ANY UNKNOWN PERSON(S) who made a
contribution to Mile High Accountability Project
in the name of U.S. Accountability Project, Inc.

SUPPLEMENTAL COMPLAINT

1. On June 25, 2026, Campaign Legal Center ("CLC") and Sophia Gonsalves-Brown filed a complaint with the Federal Election Commission (the "FEC" or "Commission") alleging that the Mile High Accountability Project ("MHAP"), a pop-up super PAC that at the time had reported spending $350,000 on digital advertising supporting Rep. Diana DeGette in the Democratic primary for Colorado's first congressional district, failed to file a required pre-primary election report.[1] On June 26, 2026, after CLC filed its original FEC complaint and just three days before the Colorado primary, MHAP belatedly filed its required pre-primary report, which had been due June 18, 2026. MHAP's untimely filing does not cure its violation of federal reporting requirements, which illegally

[1] Compl., Campaign Legal Center (June 25, 2026), https://campaignlegal.org/document/clc-alleges-pop-pac-targeting-colorado-primary-violated-federal-reporting-rules.

concealed important campaign finance information from voters in the crucial days leading up to a congressional primary election.

2. Further, MHAP's belatedly filed pre-primary report disclosed that the super PAC had just two contributors, and that nearly 95% of its funding came from a single source: an opaque corporate entity named the "U.S. Accountability Project Inc." ("USAP") that was formed roughly ten weeks earlier in Delaware, has no discernible public presence, and later registered a separate, affiliated branch in Colorado at the *same address* as MHAP—an address belonging to the law firm run by David Scott Martinez, the PAC's treasurer. USAP's reported contributions to MHAP were made at around the same dates, and for similar amounts, as MHAP's reported spending on independent expenditures supporting DeGette in her primary race.

3. There is no publicly available information indicating that USAP conducted any business or other activity between its formation and the six-figure contributions made in its name, from which it could have generated sufficient funds to contribute $470,000 without someone (*i.e.*, the true contributor) transferring funds to USAP for that purpose. As such, there is reason to believe USAP was not the true source of these contributions, and was instead established and used as a straw donor by one or more unknown persons to contribute $470,000 to MHAP while concealing their identities—part of a scheme to secretly funnel money into the Colorado Democratic primary election.

4. This supplemental complaint, which incorporates by reference all facts and allegations contained in the original complaint filed on June 25, 2026, 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, the U.S. Accountability Project Inc., and

any unknown persons that contributed to MHAP in the name of USAP violated the Federal Election Campaign Act ("FECA" or the "Act"), 52 U.S.C. § 30101, *et seq.*[2]

SUPPLEMENTAL FACTS

5. U.S. Accountability Project, Inc. ("USAP") was incorporated in Delaware as a 501(c)(4) nonprofit corporation on March 24, 2026.[3]

6. USAP registered a branch in Colorado on April 8, 2026, and listed as its address 1601 Arapahoe Street, Floor 10, Denver, Colorado 80202.[4] This is the same street address that belongs to Martinez and Partners, LLC, the law firm headed by MHAP's treasurer, Martinez, who filed the corporation's registration paperwork.[5]

7. USAP appears to have no discernible public footprint:

   a. Google Searches provide no results that originate from "U.S. Accountability Project, Inc." or "U.S. Accountability Project" or detail any activity by domestic political entities of those names outside of results related solely to the contributions at issue in this complaint.

   b. "U.S. Accountability Project, Inc." does not appear to have any account or page on Instagram, Facebook, X (formerly known as Twitter), or Bluesky.

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

[3] U.S. Accountability Project, Inc., Entity Details, DE Dep't of State: Div. of Corps. (last visited Aug. 17, 2026) (attached as Ex. A).

[4] *About Us*, Martinez & Partners, https://www.martinezandpartners.com/about/the-firm (last visited July 28, 2026); *D. Scott Martinez*, Martinez & Partners, https://www.martinezandpartners.com/about/scott-martinez (last visited July 28, 2026).

[5] *See* Statement of Foreign Entity Authority, U.S. Accountability Project, CO Sec'y of State (Apr. 8, 2026 (attached as Ex. B).

c. There is no record of the "U.S. Accountability Project, Inc." or "U.S. Accountability Project" in searches with the Better Business Bureau,[6] Bloomberg,[7] EDGAR,[8] or the Delaware Chamber of Commerce.[9]

d. USAP does not appear to have a public website.

8. Mile High Accountability Project ("MHAP") registered with the Commission as a super PAC on April 29, 2026.[10] It named Martinez as its treasurer and listed the same address as Martinez's law firm and USAP's Colorado branch, 1601 Arapahoe Street, Floor 10, Denver, Colorado 80202.[11] Martinez does not serve as the treasurer of any other federal political committee.[12]

9. On June 8, 2026, just over a month after it registered with the FEC, MHAP filed a 24/48-hour report of independent expenditures ("IEs"),[13] *i.e.*, a report triggered by paying for independent communications which expressly advocate the election or defeat of a clearly identified federal candidate.[14] 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.[15]

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[6] *See* Better Business Bureau, https://www.bbb.org/search/ (last visited July 29, 2026).

[7] *See* Bloomberg, Company Search, https://www.bloomberg.com/ (last visited July 29, 2026).

[8] U.S. Securities and Exchange Commission, EDGAR, https://www.sec.gov/edgar/search/ (last visited July 29, 2026).

[9] *See* Delaware State Chamber of Commerce, Member Directory, https://web.dscc.com/atlas/directory/search (last visited July 29, 2026).

[10] MHAP, Statement of Org. at 1 (Apr. 29, 2026), https://docquery.fec.gov/pdf/536/202604299866728536/202604299866728536.pdf.

[11] *Id.*

[12] *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 July 28, 2026).

[13] MHAP, 24/48 Hour Report of Independent Expenditures (June 8, 2026), https://docquery.fec.gov/pdf/249/202606089870439249/202606089870439249.pdf (last viewed July 28, 2026) ("June 8 MHAP IE Report").

[14] 52 U.S.C. §§ 30101(17), 30104(g)(1); 11 C.F.R. §§ 100.16, 104.4(c).

[15] June 8 MHAP IE Report.

10. On June 25, 2026, CLC and Sophia Gonsalves-Brown filed a complaint with the Commission alleging, among other things, that MHAP failed to file a required pre-primary election report that was due by June 18, 2026.[16]

11. On June 26, 2026, the day after CLC filed its original FEC complaint, MHAP filed its required pre-primary report.[17] This report, filed 12 days late, disclosed that the super PAC had just two contributors, and that $350,000 of its $370,000 in reported receipts came from USAP on June 4, 2026[18]—two days before MHAP paid the same amount to a digital ad firm, COMPETE Digital LLC, to run attack ads against DeGette's opponent.[19] MHAP's only other reported contributor was the American Association for Justice Political Action Committee (AAJ PAC), which had given $20,000.[20]

12. MHAP reported making an additional $135,000 independent expenditure to the same firm on June 26, 2026,[21] the same day it reportedly received an additional $120,000 from USAP.[22]

13. In sum, MHAP reported spending $485,000 to influence the primary election in Colorado's 1st congressional district, while receiving $470,000 from USAP—95.9% of MHAP's total receipts.[23]

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[16] Compl., Campaign Legal Center (June 25, 2026), https://campaignlegal.org/document/clc-alleges-pop-pac-targeting-colorado-primary-violated-federal-reporting-rules.

[17] Mile High Accountability Project, 12-Day Pre-Primary Election Report (June 26, 2026), https://docquery.fec.gov/pdf/470/202606269874270470/202606269874270470.pdf.

[18] *Id*.

[19] June 8 MHAP IE Report; In CLC's June 25 complaint, CLC also alleged that MHAP misclassified its spending as ads in support of Diana DeGette when the facts indicate they were primarily attack ads directed at a primary opponent.

[20] *Id.*

[21] MHAP, 24/48 Hour Report of Independent Expenditures (June 8, 2026), https://docquery.fec.gov/pdf/257/202606269874270257/202606269874270257.pdf (last viewed July 20, 2026) ("June 26 MHAP IE Report").

[22] Mile High Accountability Project, July Quarterly Report (July 16, 2026) https://docquery.fec.gov/pdf/669/202607169890838669/202607169890838669.pdf.

[23] June 26 MHAP IE Report.

SUMMARY OF THE LAW

14. 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."[24] The reason-to-believe finding is a threshold determination and "does not establish that the law has been violated."[25] The Commission uses the ensuing investigation "to determine whether a violation in fact occurred and, if so, its exact scope."[26] 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.[27]

Straw Donor Prohibition

15. 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.[28]

16. 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

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[24] 52 U.S.C. § 30109(a)(2); *see* 11 C.F.R. § 111.10(a).

[25] 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.

[26] *Id.*

[27] *Id.*

[28] 52 U.S.C. § 30122.

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."[29]

17. 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,[30] 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 evaluate candidates for office, "make informed decisions[,] and give proper weight to different speakers and messages."[31]

18. 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

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[29] 11 C.F.R. § 110.4(b)(2)(i)-(ii).

[30] *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).

[31] *Citizens United v. FEC*, 558 U.S. 310, 369—71 (2010).

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]."[32]

19. 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."[33] The Commission subsequently entered into a conciliation agreement with Tomfoolery LLC and Chavez, which included a $25,000 civil penalty.[34]

20. 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.[35]

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[32] *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).

[33] 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.

[34] *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).

[35] *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.

21. 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.[36] Fuentes-Fernandez was sentenced to serve 14 months in prison, while the super PAC was ordered to pay a $150,000 fine and was placed on probation for three years.[37]

22. As these and other prior cases illustrate, straw donor contributions like those alleged here are serious violations of federal campaign finance law.[38] 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.[39] Indeed,

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

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

[38] *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; Press Release, 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-andconceal-foreign.

[39] *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.

straw donor schemes have previously been used to skirt FECA's source prohibitions, such as the ban on contributions by government contractors[40] and foreign nationals.[41]

23. 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.

SUPPLEMENTAL CAUSE OF ACTION

COUNT III:
U.S. ACCOUNTABILITY PROJECT, INC., MILE HIGH ACCOUNTABILITY PROJECT, AND UNKNOWN PERSONS VIOLATED FECA'S PROHIBITION ON CONTRIBUTIONS IN THE NAME OF ANOTHER, 52 U.S.C. § 30122.

24. The available information indicates that USAP did not have the means to contribute $470,000 to MHAP without one or more persons providing funds to USAP for that purpose, such that these unknown other persons were, in fact, the true source(s) of the contributions made to MHAP in USAP's name.

25. USAP was registered as a Delaware corporation on March 24, 2026.[42] Two weeks later, USAP registered a branch in Colorado.[43] Fewer than eight weeks later, USAP purported to make a $350,000 contribution to MHAP, a super PAC that had registered with the FEC

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[40] *See* Press Release, Dep't of Justice, Former Government Contractor Executives Indicted for Unlawful Campaign Contributions (Feb. 10, 2022), https://www.justice.gov/archives/opa/pr/former-government-contractor-executives-indicted-unlawful-campaign-contributions; Dep't of Justice, *Former Government Contractor Executive Pleads Guilty to Unlawful Campaign Contributions* (Sept. 27, 2022), https://www.justice.gov/usao-dc/pr/former-government-contractor-executive-pleads-guilty-unlawful-campaign-contributions.

[41] *See* Press Release, Dep't of Justice, Political Consultant Convicted for Scheme Involving Illegal Foreign Campaign Contribution to 2016 Presidential Campaign (Feb. 17, 2023), https://www.justice.gov/archives/opa/pr/political-consultant-sentenced-scheme-involving-illegal-foreign-campaign-contribution-2016.

[42] Ex. A.

[43] Ex. B.

during the intervening period.[44] Fewer than three weeks after that, USAP contributed another $120,000 to MHAP.[45]

26. USAP did not appear to engage in any activity whatsoever between its incorporation and the first of its six-figure super PAC contributions: it has no social media presence, no website, no physical presence, and is not reported in any business databases.[46] Indeed, USAP appears to exist only on paper, with no actual operations or activities that would permit it to garner sufficient funds to make $470,000 in contributions to a super PAC.[47] Thus, USAP appears to have "lacked the financial wherewithal" to make $470,000 in contributions to MHAP.[48]

27. The use of a straw donor, such as the opaque and obscure Delaware corporation at issue, to effectively act as a clearinghouse for the contribution(s) of other person(s)—whose identities thereby remain concealed from the pubic—undermines the basic transparency required under FECA, which is essential to empower voters to participate in elections with full knowledge of who is spending money to influence their vote and to protect elections against real or apparent corruption.

28. Accordingly, based on the foregoing, there is reason to believe the unidentified person(s) who contributed $470,000 to MHAP in the name of USAP violated 52 U.S.C. § 30122 by making contributions in the name of another, and that USAP violated 52 U.S.C. § 30122

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[44] June 8 MHAP IE Report.

[45] Mile High Accountability Project, July Quarterly Report (July 16, 2026) https://docquery.fec.gov/pdf/669/202607169890838669/202607169890838669.pdf.

[46] *See* supra notes 6-9.

[47] Mile High Accountability Project, July Quarterly Report (July 16, 2026) https://docquery.fec.gov/pdf/669/202607169890838669/202607169890838669.pdf

[48] Tomfoolery F&LA at 5.

by knowingly permitting its name to be used to effect the contributions of one or more other persons in its own name.

29. Further, the available information supports finding reason to believe that MHAP violated 52 U.S.C. § 30122 by knowingly accepting $470,000 in contributions in the name of another.

30. MHAP registered with the FEC on April 29, 2026,[49] about a month after USAP formed on March 24, 2026[50] and three weeks after USAP registered a Colorado branch on April 8, 2026.[51] In fact, MHAP shares the *exact same address* as USAP's Colorado's branch[52]—an address belonging to the law firm run by a D. Scott Martinez, MHAP's treasurer.[53] And the phrase "Accountability Project" is featured in the names of both MHAP and USAP, suggesting further connection.

31. Moreover, MHAP's reporting disclosed that the PAC had just two contributors—and that USAP was the sole source of more than 95% of MHAP's funding.[54] Indeed, within a roughly three week period from June 4, 2026 through June 26, 2026, MHAP received two contributions totaling $470,000 from USAP.[55] Further, these contributions were closely aligned with MHAP's spending: two days after receiving the initial outlay

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[49] MHAP, Statement of Org. at 1 (Apr. 29, 2026), https://docquery.fec.gov/pdf/536/202604299866728536/202604299866728536.pdf.

[50] Ex. A.

[51] Ex. B.

[52] MHAP, Statement of Org. at 1 (Apr. 29, 2026), https://docquery.fec.gov/pdf/536/202604299866728536/202604299866728536.pdf.

[53] *About Us*, Martinez & Partners, https://www.martinezandpartners.com/about/the-firm (last visited July 28, 2026); *D. Scott Martinez*, Martinez & Partners, https://www.martinezandpartners.com/about/scott-martinez (last visited July 28, 2026).

[54] Mile High Accountability Project, July Quarterly Report (July 16, 2026) https://docquery.fec.gov/pdf/669/202607169890838669/202607169890838669.pdf.

[55] *Id.*

$350,000 from USAP, MHAP spent *exactly* $350,000 on digital advertisements.[56] And one day *after* it spent an additional $135,000 on digital advertising (a sequence of events which at the least indicates a reporting mistake, if not evidence of illegal behavior), MHAP reported it received an additional $120,000 from USAP.[57] Particularly in light of these surrounding circumstances, it is utterly implausible that this newly formed super PAC did not know the identities of the true contributor(s) providing more than 95% of its funding, which it immediately used to make independent expenditures in the days leading up to the Colorado congressional primary.

32. Given the short timeframe between the formation of USAP and MHAP, the two entities' shared Colorado address, and the fact that MHAP received nearly all of its funding from USAP, the overall record supports finding reason to believe that MHAP knew that USAP was not the true source of the contributions made in its name, *i.e.*, that MHAP violated 52 U.S.C. § 30122 by knowingly accepting contributions in the name of another.

Prayer for Relief

33. Wherefore, the Commission should find reason to believe that the Mile High Accountability Project and David Scott Martinez in his official capacity as treasurer, the U.S. Accountability Project, Inc., and the unknown person(s) who contributed to MHAP in USAP's name violated 52 U.S.C. § 30101 *et seq.*, and conduct an immediate investigation under 52 U.S.C. § 30109(a)(2).

34. Further, the Commission should seek appropriate sanctions for any and all violations, including civil penalties sufficient to deter future violations and an injunction prohibiting

[56] Mile High Accountability Project, 12-Day Pre-Primary Election Report (June 26, 2026), https://docquery.fec.gov/pdf/470/202606269874270470/202606269874270470.pdf.

[57] Mile High Accountability Project, July Quarterly Report (July 16, 2026) https://docquery.fec.gov/pdf/669/202607169890838669/202607169890838669.pdf.

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

August 17, 2026

Verification

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

Sworn pursuant to 18 U.S.C. § 1001.

For Complainant Sophia Gonsalves-Brown

Sophia Gonsalves-Brown

Sophia Gonsalves-Brown

State of Nevada, County of Clark

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

Carlos Pittman

Notary Public

Carlos Pittman
NOTARY PUBLIC
STATE OF NEVADA
Appt. No. 21-5441-01
Expires March 7, 2029

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.

State of Nevada, County of Clark

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

____

Notary Public

Mark A Braddy
NOTARY PUBLIC
STATE OF NEVADA
Appt. No. 22-6937-01
Expires January 7, 2030

Notarized remotely using audio-video communication technology via Proof.

Exhibit A

Department of State: Division of Corporations

Allowable Characters

HOME

Entity Details

THIS IS NOT A STATEMENT OF GOOD STANDING

File Number:	**10559108**	Incorporation Date / Formation Date:	**3/24/2026** (mm/dd/yyyy)
Entity Name:	**US ACCOUNTABILITY PROJECT INC.**		
Entity Kind:	**Corporation**	Entity Type:	**Exempt**
Residency:	**Domestic**	State:	**DELAWARE**

REGISTERED AGENT INFORMATION

Name:	**HARVARD BUSINESS SERVICES, INC.**		
Address:	**16192 COASTAL HWY**		
City:	**LEWES**	County:	**Sussex**
State:	**DE**	Postal Code:	**19958**
Phone:	**302-645-7400**		

Additional Information is available for a fee. You can retrieve Status for a fee of $10.00 or more detailed information including current franchise tax assessment, current filing history and more for a fee of $20.00.

Would you like ○ Status ○ Status,Tax & History Information

Submit

New Entity Search

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

Exhibit B

Business Program
Colorado Secretary of State
1700 Broadway, Ste. 550 Denver, CO 80290
Phone: 303-894-2200 Fax: 303-869-4864
Email: Business@coloradosos.gov Website: www.coloradosos.gov

E-Filed

Colorado Secretary of State
ID#: 20261431827
Document #: 20261431827
Filed on: 04/08/2026 09:56:14 AM
Paid: $100.00

Statement of Foreign Entity Authority

Filed pursuant to § 7-90-803 of the Colorado Revised Statutes (C.R.S.)

Section 1 – Entity information

The entity ID number, the entity name, and the true name, if different, are:

Entity ID Number:

20261431827

Entity name:

US Accountability Project

True name (if different from the entity name):

Section 2 – Form of entity and jurisdiction

The form of entity and the jurisdiction under the law of which the entity is formed are:

Form of entity:

Foreign Nonprofit Corporation

Jurisdiction:

Delaware

Section 3 – Principal office address

The principal office address of the entity's principal office is:

Street Address

Street Address 1

1601 Arapahoe Street

Street Address 2

Floor 10

City	State	ZIP code
Denver	CO	80202

Province (if applicable)	Country
	United States

Mailing Address (Leave blank if same as street address)

Mailing Address 1

Mailing Address 2

City | State | ZIP code

Province (if applicable) | Country

Section 4 – Registered Agent Information

The registered agent name and registered agent address of the registered agent are:

Name (if an individual)

Last name | First name | Middle | Suffix

or

Name (if an entity)

Martinez & Partners LLC

Caution: Do not provide both an individual and an entity name.

Street Address

Street Address 1

1601 Arapahoe St Fl 10

Street Address 2

City: Denver

State: CO

ZIP code: 80202

Mailing Address (Leave blank if same as street address)

Mailing Address 1

Mailing Address 2

City

State: CO

ZIP code

If applicable, adopt the following statement by marking the box:

☒ The person appointed as registered agent has consented to being so appointed.

Section 5 – Date of commencing business in Colorado

The date the entity commenced or expects to commence transacting business or conducting activities in Colorado is (mm/dd/yyyy):

04/08/2026

Section 6 – Additional information

If the following statement applies, adopt the statement by marking the box and include an attachment.

☐ This document contains additional information as provided by law.

Section 7 – Delayed effective date (if applicable)

The delayed effective date and/or time (mm/dd/yyyy hour:minute am/pm) of this document is (if applicable):

Caution: Leave blank if the document does not have a delayed effective date. Stating a delayed effective date has significant legal consequences. If you don't enter a specific time, the filing will take effect at 11:59 PM. Times are MST/MDT.

Section 8 – Notice of perjury

Causing this document to be delivered to the Secretary of State for filing shall constitute the affirmation or acknowledgment of each individual causing such delivery, under penalties of perjury, that such document is such individual's act and deed, or that such individual in good faith believes such document is the act and deed of the person on whose behalf such individual is causing such document to be delivered for filing, taken in conformity with the requirements of part 3 of article 90 of title 7, C.R.S. and, if applicable, the constituent documents and the organic statutes, and that such individual in good faith believes the facts stated in such document are true and such document complies with the requirements of that Part, the constituent documents, and the organic statutes.

This perjury notice applies to each individual who causes this document to be delivered to the Secretary of State, whether or not such individual is identified in this document as one who has caused it to be delivered.

Section 9 – Filer's information

The true name and mailing address of the individual causing the document to be delivered for filing are:

Last name	First name	Middle	Suffix
Martinez	David	Scott	

Address 1

1601 Arapahoe Street

Address 2

Floor 10

City	State	ZIP code
Denver	CO	80202

Province (if applicable)	Country
	United States

If applicable, mark this box and include an attachment stating the additional individuals.

☐ This document contains the true name and mailing address of one or more additional individuals causing the document to be delivered for filing.

Section 10 – Disclaimer

This form/cover sheet, and any related instructions, are not intended to provide legal, business or tax advice, and are furnished without representation or warranty. While this form/cover sheet is believed to satisfy minimum legal requirements as of its revision date, compliance with applicable law, as the same may be amended from time to time, remains the responsibility of the user of this form/cover sheet.

Questions should be addressed to the user's legal, business or tax advisor(s).