

**BEFORE THE FEDERAL ELECTION COMMISSION**

CAMPAIGN LEGAL CENTER  
1101 14th Street NW, Suite 400  
Washington, DC 20005

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

DONALD J. TRUMP  
P.O. Box 509  
Arlington, VA 22216

MAGA INC. and CHARLES GANTT  
in his official capacity as treasurer  
100 Cummings Center, Suite 306-P  
Beverly, MA 01915

**COMPLAINT**

1. In recent weeks, President Donald Trump has repeatedly and publicly asserted that he controls and directs MAGA Inc., a hybrid political committee with an account that functions as a super PAC. Regarding the 2026 midterm elections, Trump has told reporters “I’m going to spend whatever amount of money necessary to try to help us, and this is money from MAGA Inc. This is my money that I control.” On another occasion, Trump corrected an interviewer who referred to his allies controlling MAGA Inc., underscoring that the PAC was “Not [controlled by] my allies. I control it.” For over twenty years, however, federal campaign finance laws have barred federal officeholders, like Trump, from controlling or operating groups, like MAGA Inc., that raise and spend “soft money,” funds that do not comply with federal contribution limits, source prohibitions, and reporting requirements. MAGA Inc. has reportedly raised more than \$400 million, virtually all through six- and seven-figure contributions from special interest groups, corporations, and ultra-wealthy individuals. Trump’s public statements are thus a remarkable admission of a serious campaign finance violation.

2. The Federal Election Campaign Act (“FECA” or the “Act”) bars federal officeholders like Trump from directly or indirectly soliciting, directing, or spending soft money in connection with a federal election, and similarly bars entities like MAGA Inc. that are “controlled” or “maintained” by a federal officeholder from soliciting, receiving, and spending soft money. These prohibitions prevent big donors from circumventing federal contribution limits by funneling massive amounts of money to entities closely affiliated with officeholders that are not fully regulated by FECA, and likewise prevent officeholders from becoming beholden to such donors.
3. According to Trump’s own public admissions, he decides when and how MAGA Inc. will deploy its funds, an arrangement that unquestionably means Trump is directing or spending soft money while serving as a federal officeholder, and that MAGA Inc. is an entity controlled or maintained by a federal officeholder that is not allowed to raise, accept, or spend soft money. Accordingly, this complaint is filed pursuant to 52 U.S.C. § 30109(a)(1) and is based on information and belief that Trump and MAGA Inc. have violated FECA, 52 U.S.C. § 30101, *et seq.*<sup>1</sup>

#### FACTS

4. Donald Trump has been the sitting president, and thus a federal officeholder, from January 20, 2025, to the present.<sup>2</sup>
5. MAGA Inc., with Charles Gantt in his official capacity as treasurer, is a hybrid PAC, *i.e.*, a federal political committee that maintains two accounts—a “contribution account,” which raises and spends hard money and can make contributions to candidates, and a

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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> Donald J. Trump, White House, <https://www.whitehouse.gov/administration/donald-j-trump/> (last visited Sep. 9, 2026).

“non-contribution account,” which functions like a super PAC—it can raise and spend unlimited amounts of money and corporate funds, but can only make independent expenditures.<sup>3</sup>

6. MAGA Inc. registered with the Commission in November 2024, immediately following President Trump’s electoral victory.<sup>4</sup> According to its most recent FEC report, it has just over \$400 million in its non-contribution account and no money in its contribution account.<sup>5</sup> The non-contribution account has reported receiving dozens of multi-million-dollar contributions and contributions from corporations,<sup>6</sup> and it has run independent expenditures in connection with a 2025 special election and the 2026 midterm elections.<sup>7</sup>
7. President Trump has never hidden his close affiliation with MAGA Inc.—a PAC that bears the acronym of his well-known campaign slogan, “Make America Great Again.”<sup>8</sup>

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<sup>3</sup> MAGA Inc., Amend. Statement of Org. at 1–2 (Mar. 11, 2026), <https://docquery.fec.gov/pdf/225/202603119837936225/202603119837936225.pdf>; see also *Types of Nonconnected PACs*, FEC, <https://www.fec.gov/help-candidates-and-committees/registering-pac/types-nonconnected-pacs/> (last visited Sep. 9, 2026).

<sup>4</sup> MAGA Inc., Statement of Org. at 1 (Nov. 7, 2024), <https://docquery.fec.gov/pdf/728/202411079719934728/202411079719934728.pdf>.

<sup>5</sup> MAGA Inc., Aug. Monthly Rpt. at 2–3 (Aug. 20, 2026), <https://docquery.fec.gov/pdf/709/202608209903328709/202608209903328709.pdf>. MAGA Inc.’s contribution account has never received any money. See *id.*; see also MAGA Inc., 2024 Year-End Rpt. at 3 (Jan. 31, 2025), <https://docquery.fec.gov/pdf/484/202501319752674484/202501319752674484.pdf>; MAGA Inc., 2025 Year-End Rpt. at 3 (Jan. 31, 2026), <https://docquery.fec.gov/pdf/870/202601319808906870/202601319808906870.pdf>.

<sup>6</sup> *Receipts: MAGA Inc.*, FEC, 2025-26 or 2023-24, [https://www.fec.gov/data/receipts/?data\\_type=processed&committee\\_id=C00892471&two\\_year\\_transaction\\_period=2024&two\\_year\\_transaction\\_period=2026](https://www.fec.gov/data/receipts/?data_type=processed&committee_id=C00892471&two_year_transaction_period=2024&two_year_transaction_period=2026) (last visited Sep. 10, 2026) (listing, for example, three \$10 million contributions and a \$5 million contribution from Foris Dax, Inc. (for a total of \$35 million from the company) and a \$10 million contribution from an individual named Konstantin Sokolov).

<sup>7</sup> *Independent Expenditures (24/48 Hour Reports): MAGA Inc.*, FEC, [https://www.fec.gov/data/independent-expenditures/?data\\_type=processed&q\\_spender=C00892471](https://www.fec.gov/data/independent-expenditures/?data_type=processed&q_spender=C00892471) (last visited Sep. 10, 2026).

<sup>8</sup> MAGA Inc. is also the successor entity to Make America Great Again Inc., the primary super PAC that supported Trump during the 2024 presidential election. See *Spending: Make America Great Again Inc.*, FEC, 2023-24, <https://www.fec.gov/data/committee/C00825851/?tab=spending&cycle=2024> (last visited Sep. 10, 2026). The two PACs have the same treasurer and street address, and Make America Great Again Inc. transferred its leftover funds to MAGA Inc. See *About This Committee: Make America Great Again Inc.*, FEC, 2025-26, <https://www.fec.gov/data/committee/C00825851/?tab=about-committee&cycle=2026> (last visited Sep. 10, 2026); *Disbursements: Make America Great Again Inc.*, FEC, 2025-26, [https://www.fec.gov/data/disbursements/?committee\\_id=C00825851&two\\_year\\_transaction\\_period=2026&data\\_type=processed](https://www.fec.gov/data/disbursements/?committee_id=C00825851&two_year_transaction_period=2026&data_type=processed) (last visited Sep. 10, 2026).

Trump has regularly headlined fundraising events for the PAC since returning to office, including events with a six-figure entrance fee and candlelight dinners at his Mar-a-Lago property.<sup>9</sup>

8. In recent weeks, Trump has also openly and repeatedly claimed that he controls MAGA Inc. and directs its spending.
  - a. In a video interview with *Punch Bowl News*, published on August 7, 2027, the interviewer described MAGA Inc. as a super PAC controlled by Trump’s allies.<sup>10</sup> Trump quickly corrected the interviewer, “Not my allies, I control it.”<sup>11</sup> When asked if he was going to spend MAGA Inc.’s war chest on the midterms, Trump stated, “I could spend it on pretty much anything I want. I’m going to spend it for uh I’m going to help Republicans.”<sup>12</sup>
  - b. On August 21, 2026, when speaking to the press before boarding Air Force One, Trump stated that he would spend “a lot” of money from MAGA Inc.: “I’ll be spending a lot of that money for—and my own money—but I’ll be spending a lot of that money for candidates that I think are good, Republican candidates.”<sup>13</sup>

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<sup>9</sup> See, e.g., Kate Ackley, *MAGA Dinner, UFC Event Are Tough Tickets for Lobbyists to Get*, Bloomberg Gov. (Jun. 10, 2026), <https://news.bgov.com/bloomberg-government-news/maga-dinner-ufc-event-are-tough-tickets-for-lobbyists-to-get>; Arden Farhi & Kathryn Watson, *Trump Headlining \$1 Million a Person Super PAC Dinner as Stocks Sink Over Tariffs*, CBS News (Apr. 4, 2025), <https://www.cbsnews.com/news/trump-hosts-liv-golf-fundraiser-as-stocks-sink-over-tariffs/>; Leah Feiger, et al., *People Are Paying Millions to Dine with Donald Trump at Mar-a-Lago*, WIRED (Mar. 4, 2025), <https://www.wired.com/story/people-paying-millions-donald-trump-mar-a-lago/>.

<sup>10</sup> *EXCLUSIVE: President Trump Has a Message for Congress*, Punchbowl News, YouTube (Aug. 7, 2026), <https://youtu.be/T9omos50y8k?t=1107> (segment on MAGA Inc. begins at 18:27).

<sup>11</sup> *Id.*

<sup>12</sup> *Id.*

<sup>13</sup> Mallory Wilson, *Trump Says He’ll Spend ‘A Lot’ of MAGA Inc. Funds in Midterms*, The Hill (Aug. 21, 2026), <https://thehill.com/homenews/administration/6044628-trump-spending-maga-pac-midterms/>.

- c. On September 4, 2026, during an Oval Office press conference, Trump explicitly described the money within MAGA Inc. as “my money that I control.”<sup>14</sup> In the full exchange with reporters, he detailed his control of MAGA Inc.’s finances, how he makes decisions about MAGA Inc.’s spending, and his plans for using MAGA Inc. to influence the 2026 midterms and 2028 presidential election:

**Reporter:** When will your super PAC, MAGA Inc., start spending on Ken Paxton?

**Trump:** We already did, ya.

**Reporter:** But will you spend more?

**Trump:** Well I have—I think I have like close to a billion dollars in the super PAC, and I’m allocating probably \$400, \$500 million. So I’ll be spending, we’ll be spending—

**Reporter:** On the midterm election?

**Trump:** Ya. We’re going to spend a lot of money because we don’t want to lose our country . . . .

**Reporter:** How do you make that determination of how to spend and when to spend?

**Trump:** How do I make it? I sit down and I say, “let’s do this, let’s do that.” . . . I’m going to be making contributions to various campaigns of people that I think are good—Republicans that I think are good. People that I think are going to win and can win or who are close to winning. People that—I think we have a chance of doing very well in the midterms . . . .

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<sup>14</sup> The media extensively covered this brazen remark. See, e.g., Luke Fountain, *Trump Says He Will Spend Up to \$500 Million of ‘My Money’ to Help Republicans in Midterms*, CNBC, <https://www.cnbc.com/2026/09/04/trump-maga-inc-500-million-republicans-midterm-elections.html> (Sep. 4, 2026); Gram Slattery & Steve Holland, *Trump Says He Will Spend \$400 Million to \$500 Million from His Super PAC on Midterm Elections*, Reuters (Sep. 4, 2026), [https://www.reuters.com/world/us/trump-says-he-will-allocate-400-500-million-super-pac-midterms-2026-09-04/?utm\\_medium=Social&utm\\_source=Facebook](https://www.reuters.com/world/us/trump-says-he-will-allocate-400-500-million-super-pac-midterms-2026-09-04/?utm_medium=Social&utm_source=Facebook); Brie Stimson & Paul Steinhauser, *Trump-Linked MAGA Inc Pours \$10M Into Ken Paxton’s Texas Senate Race Against James Talarico*, Fox News (Sep. 5, 2026), <https://www.foxnews.com/politics/trump-linked-maga-inc-pours-10m-ken-paxton-texas-senate-race-james-talarico>; Gregory Svirnovskiy & Alex Gangitano, *Trump’s MAGA Inc. Sends \$10M to Texas in First General Election Spend of the Year*, Politico (Sep. 5, 2026), <https://www.politico.com/news/2026/09/05/trump-maga-midterms-republicans-01066625>.

I'm going to spend whatever amount of money necessary to try to help us. And this is money from MAGA Inc. This is my money that I control. Now this is separate from the RNC, it's separate from people having money. And I think it's not even capped in terms of the media; I'm not sure that they ever talk about it. They just found out about it. But ya, we have around a billion dollars that I can spend. I can spend for the next race also. I can spend it for what I want to spend it for. But I'm going to help a lot of the congressmen and senators that need help.

**Reporter:** Will you save some of that money for 2028?

**Trump:** I could use it for '28 yes, if I want, sure. I mean, I expect to have money leftover, and we can use that for '28.<sup>15</sup>

9. Trump allies have likewise indicated that Trump controls MAGA Inc. and determines how it will spend its money: As reported in *The Atlantic*, based on interviews with at least three people familiar with the meeting, in early August 2026, Trump summoned his top political advisors to the Oval Office to discuss “how to spend [MAGA Inc.’s] \$400 million political war chest with fewer than 100 days to go before the midterm elections.”<sup>16</sup> Indeed, at that meeting, Trump appears to have been involved in minute details of the PAC’s planned spending:

The solution Trump settled on, according to three people familiar with the meeting, was to lean into the Democratic strategy of focusing on himself. The president ordered a series of television advertisements about his own record that will serve as a backdrop to

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<sup>15</sup> *US President Trump Says MAGA Inc Will Spend Up to \$500 Million in Midterms*, DawnNews English, YouTube, <https://www.youtube.com/watch?v=sxoaegcVcWE> (posted Sep. 5, 2026). The reference to \$1 billion is likely from combining the fundraising totals of MAGA Inc. and its affiliated dark-money organization, Securing American Greatness, which reportedly has \$450 million. Vaughn Hillyard, *et al.*, *Trump Sits on \$850 Million as Republicans Wait*, MS NOW (Sep. 4, 2026), <https://www.ms.now/news/trump-maga-inc-midterms-republicans>; see also Ian Vandewalker, *Unprecedented Big Money Surge for Super PAC Tied to Trump*, Brennan Ctr. for Justice (Aug. 5, 2025), <https://www.brennancenter.org/our-work/analysis-opinion/unprecedented-big-money-surge-super-pac-tied-trump>.

<sup>16</sup> Yvonne Wingett Sanchez, *et al.*, *Trump Plans to Buy Midterm Ads About His Own Record*, *The Atlantic* (Aug. 25, 2026), <https://www.theatlantic.com/politics/2026/08/trump-midterms-ads-maga/688409/> (may be accessed in full at <https://web.archive.org/web/20260826094618/https://www.theatlantic.com/politics/2026/08/trump-midterms-ads-maga/688409/>).

the hundreds of individual House and Senate contests. Trump wanted what one person described to us as “environmental lift” ads—commercials that would focus on nationalizing the midterms broadly around his victories—and he suggested that the ad makers mine his own on-camera statements as building blocks. . . . That decision has resulted in a Trump midterm-election ad blitz that is set to be rolled out soon from MAGA Inc., the main repository of Trump’s political fundraising, according to people familiar with the discussions.<sup>17</sup>

#### 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.”<sup>18</sup> The reason-to-believe finding is a threshold determination and “does not establish that the law has been violated.”<sup>19</sup> The Commission uses the ensuing investigation “to determine whether a violation in fact occurred and, if so, its exact scope.”<sup>20</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>21</sup>

#### *Soft Money*

11. FECA requires that the funds federal officeholders raise and spend in connection with federal elections comply with federal campaign finance laws. The Bipartisan Campaign Reform Act of 2002 (“BCRA”) amended FECA to prohibit federal candidates and

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<sup>17</sup> *Id.*

<sup>18</sup> 52 U.S.C. § 30109(a)(2); *see* 11 C.F.R. § 111.10(a).

<sup>19</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) (“RTB Standard”).

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

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

officeholders, their agents, and any entities that they directly or indirectly establish, finance, maintain, or control from raising or spending funds in connection with a federal election outside of FECA’s contribution limits, source prohibitions, and reporting requirements—*i.e.*, so-called “soft money.”<sup>22</sup>

12. Specifically, FECA provides, in relevant part:

[An] individual holding Federal office . . . or an entity directly or indirectly established, financed, maintained or controlled by or acting on behalf of 1 or more . . . individuals holding Federal office, shall not [ ] solicit, receive, direct, transfer, or spend funds in connection with an election for Federal office . . . unless the funds are subject to the limitations, prohibitions, and reporting requirements of this Act.<sup>23</sup>

13. Among other restrictions, the Act limits political committees to accepting no more than \$5,000 per year from an individual donor and prohibits corporate contributions.<sup>24</sup>

Accordingly, hybrid PACs—which maintain an account that can accept unlimited contributions and corporate money—are soft-money entities.<sup>25</sup>

14. The FEC’s regulations provide a non-exhaustive list of factors to consider in determining whether a soft-money entity is directly or indirectly “maintained” or “controlled” by a federal officeholder.<sup>26</sup> The list includes whether the federal officeholder has the authority or ability to direct or participate in the governance of the entity through “formal or informal practices or procedures” and whether the officeholder can “control the officers[ ] or other decision-making employees or members of the entity.”<sup>27</sup> The Commission weighs these factors “in the context of the overall relationship between [the

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<sup>22</sup> See generally 52 U.S.C. § 30125; 11 C.F.R. part 300.

<sup>23</sup> 52 U.S.C. § 30125(e)(1)(A); see also 11 C.F.R. §§ 300.60–.61.

<sup>24</sup> 52 U.S.C. §§ 30116(a)(1)(C), 30118(a).

<sup>25</sup> See *Types of Nonconnected PACs*, *supra* note 3.

<sup>26</sup> See 11 C.F.R. § 300.2(c)(2).

<sup>27</sup> 11 C.F.R. § 300.2(c)(2)(ii)–(iii).

officeholder] and the entity.”<sup>28</sup> There is no predetermined number of factors that must be present in order to make a finding that an officeholder “establishes, finances, maintains, or controls” a soft-money entity.<sup>29</sup>

15. The Commission has explicitly recognized that *Citizens United v. FEC*, 558 U.S. 310 (2010), and related authorities have not disturbed or abrogated BCRA’s soft-money provisions.<sup>30</sup> Under the law, federal candidates cannot spend the funds in a hybrid PAC’s non-contribution account and cannot directly or indirectly “establish, finance, maintain, or control” a hybrid PAC.

#### CAUSES OF ACTION

##### COUNT I:

##### **TRUMP DIRECTED OR SPENT SOFT MONEY IN CONNECTION WITH THE 2026 FEDERAL ELECTIONS, IN VIOLATION OF 52 U.S.C. § 30125(E)(1)(A)**

16. The available information provides reason to believe that Trump, while holding federal office, directed or spent soft money in MAGA Inc.’s non-contribution account by dictating which races the PAC would target with independent expenditures and how much money it would spend.
17. Trump’s own statements provide direct evidence that he controls MAGA Inc.’s spending. On multiple occasions, he has told members of the press that he controls MAGA Inc. and decides how it will spend its funds. In an interview with *Punch Bowl News*, Trump corrected a reporter who asserted that “allies” control MAGA, Inc., stating emphatically, “Not my allies, I control it.”<sup>31</sup> Trump further explained that he has the power to

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<sup>28</sup> 11 C.F.R. § 300.2(c)(2).

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

<sup>30</sup> *See* Advisory Op. 2011-12 (Majority PAC) at 3–4 (concluding that federal candidates cannot solicit funds on a super PAC’s behalf beyond FECA’s contribution limits, source prohibitions, and reporting requirements).

<sup>31</sup> *EXCLUSIVE: President Trump Has a Message for Congress*, *supra* note 10.

determine how MAGA Inc. spends its fundraising haul, saying, “I could spend it on pretty much anything I want,” and that “I’m going to spend it” helping Republican candidates.<sup>32</sup>

18. Standing outside Air Force One discussing MAGA Inc. and the 2026 midterms, Trump told the press corps that “I’ll be spending a lot of that money for candidates that I think are good, Republican candidates.”<sup>33</sup>
19. Then, in his lengthiest statement on the subject, Trump told reporters in the Oval Office: “I will spend whatever amount of money necessary to try to help us [the GOP]. *And this is money from MAGA Inc. This is my money that I control.*”<sup>34</sup> Trump also stated, “I’m allocating probably \$400, \$500 million” on the midterms, explaining that “I sit down and I say, ‘let’s do this, let do that.’”<sup>35</sup> Throughout the back-and-forth with the press, Trump consistently made clear that he controls or directs MAGA, Inc.’s spending, saying “I can spend it [MAGA Inc.’s money] for what I want to spend it for,” “I’m going to help a lot of the congressmen and senators that need help,” and “I could use it for ’28.”<sup>36</sup>
20. Trump’s statements appear to be corroborated by reports of the early August 2026 Oval Office meeting where Trump discussed with advisors how best to deploy MAGA Inc.’s money and “ordered a series of television advertisements about his own record” that prompted a forthcoming “midterm-election ad blitz that is set to be rolled out soon from MAGA Inc.”<sup>37</sup>

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<sup>32</sup> *Id.*

<sup>33</sup> Wilson, *supra* note 13.

<sup>34</sup> *US President Trump Says MAGA Inc Will Spend Up to \$500 Million in Midterms*, *supra* note 15 (emphasis added).

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

<sup>36</sup> *Id.*

<sup>37</sup> Sanchez, Atlantic, *supra* note 16.

21. Accordingly, Trump has admitted that he controls MAGA Inc. and directs how its funds are spent. As MAGA Inc. has spent funds from its non-contribution account (which contains corporate and excessive contributions, *i.e.*, soft money) on independent expenditures in 2025 and 2026 while Trump was in office,<sup>38</sup> Trump has unlawfully directed or spent soft money in connection with federal elections while he was a federal officeholder. As such, there is reason to believe that Trump violated 52 U.S.C. § 30125(e)(1)(A).

**COUNT II:**  
**MAGA INC., AN ENTITY CONTROLLED OR MAINTAINED BY A FEDERAL OFFICEHOLDER, HAS SOLICITED, RECEIVED, AND SPENT SOFT MONEY IN VIOLATION OF 52 U.S.C. § 30125(E)(1)(A)**

22. The available information also provides reason to believe that Trump—a federal officeholder—directly or indirectly controls or maintains MAGA Inc., and therefore that MAGA Inc. violated BCRA by soliciting, receiving, and spending soft money.
23. As described above, Trump, on multiple occasions, has explicitly stated that he “controls” MAGA Inc: He told *Punch Bowl News*, “I control it,” and he stood in the Oval Office and told reporters that “money from MAGA Inc. . . . is my money that I control.”<sup>39</sup> While these admissions alone provide reason to believe Trump does, in fact, control MAGA Inc., an examination of the “control” and “maintain” factors listed in the Commission’s regulations yields the same result.
24. In determining whether a federal officeholder “maintains” or “controls” an entity, such as a political committee, the FEC considers whether the officeholder can direct or participate in the governance of the entity through “formal or informal practices or

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<sup>38</sup> See *MAGA Inc. 24- and 48-Hour Reports*, *supra* note 7; see also *supra* note 6.

<sup>39</sup> *EXCLUSIVE: President Trump Has a Message for Congress*, *supra* note 10; *US President Trump Says MAGA Inc Will Spend Up to \$500 Million in Midterms*, *supra* note 15.

procedures.”<sup>40</sup> Trump appears to govern MAGA Inc. at least through informal practices. Trump has disavowed that any of his allies exert control over the PAC and has said that he “allocate[es]” the PAC’s money, tells PAC personnel “let’s do this, let’s do that,” and can spend the money “on pretty much anything I want.”<sup>41</sup> These statements indicate that Trump, in practice, directs the PAC’s strategy and spending.

25. Another factor the FEC considers is whether the officeholder can control the officers or employees of the entity.<sup>42</sup> Here, it certainly appears that Trump makes decisions and then issues binding directives to MAGA Inc.’s officers and staff, given his assertions that he is in control of the PAC and decides how and when it spends its money.<sup>43</sup>
26. With the presence of these two “maintain” and “control” factors—particularly in the context of other elements of Trump’s relationship with the PAC, including his near-constant presence at fundraising events and the name of the PAC itself<sup>44</sup>—there is ample basis to find reason to believe that Trump directly or indirectly “established, finances, maintains, or controls” MAGA Inc.
27. An entity that is “established, financed, maintained, or controlled” by a federal officeholder is barred from soliciting, receiving, and spending soft money.<sup>45</sup> MAGA Inc. has done all three. The PAC has hosted fundraising events where the lowest-priced ticket cost vastly in excess of \$5,000; it has accepted contributions from corporations and from individuals in increments far greater than \$5,000; and it has spent those otherwise

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<sup>40</sup> See 11 C.F.R. § 300.2(c)(2)(ii).

<sup>41</sup> *EXCLUSIVE: President Trump Has a Message for Congress*, *supra* note 10; *US President Trump Says MAGA Inc Will Spend Up to \$500 Million in Midterms*, *supra* note 15.

<sup>42</sup> 11 C.F.R. § 300.2(c)(2)(iii).

<sup>43</sup> See *supra* ¶ 8.

<sup>44</sup> See 11 C.F.R. § 300.2(c)(2) (stating that the Commission will weigh these factors “in the context of the overall relationship between [the officeholder] and the entity”).

<sup>45</sup> 52 U.S.C. § 30125(e)(1)(A).

excessive and prohibited contributions on independent expenditures meant to influence federal elections.<sup>46</sup>

28. Based on these facts, there is reason to believe that MAGA Inc. violated BCRA's soft-money prohibitions by soliciting, raising, and spending soft money while controlled or maintained by a federal officeholder, in violation of 52 U.S.C. § 30125(e)(1)(A).

**PRAYER FOR RELIEF**

29. Wherefore, the Commission should find reason to believe that Trump and MAGA Inc. and Charles Gantt in his official capacity as treasurer have violated 52 U.S.C. § 30101 *et seq.*, and conduct an immediate investigation under 52 U.S.C. § 30109(a)(2).
30. Further, the Commission should seek appropriate sanctions for any and all violations, including civil penalties sufficient to deter future violations and an injunction prohibiting the respondents from any and all violations in the future, and should seek such additional remedies as are necessary and appropriate to ensure compliance with FECA.

Respectfully submitted,

/s/ Saurav Ghosh  
Campaign Legal Center, by  
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September 14, 2026

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<sup>46</sup> See *supra* ¶¶ 6–7.

**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 14<sup>th</sup> day of September 2026.



Notary Public

|                                                                                                                                                                           |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Commonwealth of Pennsylvania - Notary Seal<br>Francisco J Santiago, Notary Public<br>Northampton County<br>My commission expires May 9, 2028<br>Commission Number 1446353 |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

Notarized remotely online using communication technology via Proof.