BEFORE THE FEDERAL ELECTION COMMISSION

CAMPAIGN LEGAL CENTER
ROGER G. WIEAND
1333 New Hampshire Ave., Suite 300
Washington, DC 20036

v. MUR No. _____

UNITED FUTURES INC.
300 Delaware Ave., Suite 210 #290
Wilmington, DE 19801

UNITED FUTURES PAC and
CHRISTOPER KOOB in his official
capacity as treasurer
PO Box 15845
Washington, DC 20003

MISSISSIPPI FORWARD PAC and
STEVEN MELE in his official
capacity as treasurer
PO Box 15845
Washington, DC 20003

VOTE KANSAS and
CHRISTOPER KOOB in his official
capacity as treasurer
PO Box 15845
Washington, DC 20003

49TH STATE PAC and
STEVEN MELE in his official
capacity as treasurer
PO Box 15845
Washington, DC 20003

ANY UNKNOWN PERSON(S)
who made a contribution to United Futures
PAC, Mississippi Forward PAC, Vote
Kansas, or 49th State PAC in the name of
United Futures Inc.

COMPLAINT

1. In the weeks leading up to the 2026 general election, unknown individuals appear to have orchestrated a massive scheme to funnel nearly $20 million into electoral advocacy efforts in multiple states, using United Futures, Inc. ("UFI"), a Delaware corporate entity, as a "straw donor" to illegally conceal the sources of this money. Just *twelve days* after its formation on August 12, 2026, UFI began making multimillion-dollar contributions to multiple super PACs, several of which received all or virtually all of their funding from UFI, and which immediately started spending on electoral ads and voter canvassing; UFI ultimately contributed an astonishing $19,710,000 over a six-week period between August 24, 2026, and October 8, 2026.

2. There is no indication that UFI has any real-world or digital presence, or any activity during this period from which it could have obtained sufficient funds to contribute anywhere near this much money without someone (*i.e.*, the true contributor(s)) transferring funds to UFI for that purpose. These staggering facts provide reason to believe that the unknown true contributor(s) formed and used UFI as a shell company to unlawfully conceal their identities from public disclosure, in blatant violation of federal campaign finance laws that ensure transparency for voters.

3. Moreover, there is reason to believe that at least four of the super PACs that received funds from UFI—United Futures PAC ("UF PAC"), Mississippi Forward PAC, Vote Kansas, and 49th State PAC—knowingly participated in this straw donor scheme. UFI and UF PAC were incorporated by the same person, a former high-level political operative, and list the same virtual office space on their certificates of incorporation. In addition, each of these four super PACs was incorporated in Delaware within the same

10-day period, all within just 15 days of UFI's formation. They also use the same mailing address, compliance firm, and registered agent and, most tellingly, received all or virtually all of their funding from UFI. Overall, these facts strongly indicate that these super PACs knowingly accepted contributions in the name of another, in violation of the Federal Election Campaign Act ("FECA" or the "Act").

4. Furthermore, there is reason to believe UF PAC violated FECA's reporting requirements when it failed to report contributions to several other super PACs, which those super PACs reported receiving. These unreported UF PAC contributions include a $1.3 million contribution to BOLD America and two contributions aggregating $6.25 million to People Over Politics Action Fund. UF PAC's failure to report these major contributions clearly denied voters basic transparency about its spending.

5. This complaint is filed pursuant to 52 U.S.C. § 30109(a)(1) and is based on information and belief that UFI, UF PAC, Mississippi Forward PAC, Vote Kansas, 49th State PAC, and any persons that made contributions in the name of UFI violated FECA, 52 U.S.C. § 30101, *et seq.*

FACTUAL BACKGROUND

United Futures Inc.

6. UFI was organized in Delaware as an exempt corporation on August 12, 2026, and its registered agent is the Corporation Trust Company.[1] Alana Mounce served as its incorporator, signing the entity's certificate of incorporation.[2]

7. According to information she appears to have provided on LinkedIn, Mounce is a high-level political operative, previously serving as the political director for Kamala Harris's

[1] UFI, Certificate of Incorporation (Aug. 12, 2026) (attached as Exhibit A).
[2] *Id.*

2024 presidential campaign and for the Democratic National Committee ("DNC"), and working for former President Biden's 2021 inaugural committee and then in the Biden White House.[3]

8. The address Mounce provided on UFI's certificate of incorporation is 300 Delaware Ave., Suite 210 #290, Wilmington, DE 19801.[4] That address corresponds to a virtual office space.[5]

9. UFI appears to have little to no discernible public footprint:

   a. Searches on Google provide no results that originate from the Delaware entity "United Futures Inc." itself or that detail any activity by that entity (other than articles about its political giving).

   b. "United Futures Inc." does not appear to have a website or any social media accounts.[6]

   c. There is no record of "United Futures Inc." in searches with the Better Business Bureau,[7] Bloomberg,[8] EDGAR,[9] or the New Castle County or Chicago Southland Chambers of Commerce—the local chambers of commerce for the addresses associated with UFI.[10]

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[3] *Alana Mounce*, LinkedIn, https://www.linkedin.com/in/alana-mounce-584370349/ (last visited Oct. 28, 2026) (screenshots attached as Exhibit B).

[4] Ex. A.

[5] *Reserve Your Virtual Office Address at Delaware Avenue Business Center*, DaVinci, https://www.davincivirtual.com/loc/us/delaware/wilmington-virtual-offices/facility-1929 (last visited Oct. 28, 2026).

[6] A website for an organization named "United Futures" that was created in 2025—prior to the formation of the Delaware corporate entity "United Futures Inc." at issue in this matter—appears to belong to a distinct, identically named organization. *See* United Futures, https://www.united-futures.org/ (last visited Oct. 27, 2026).

[7] *See* Better Business Bureau, https://www.bbb.org/search/ (last visited Nov. 2, 2026).

[8] *See* Bloomberg, Company Search, https://www.bloomberg.com/ (last visited Nov. 2, 2026).

[9] U.S. Securities and Exchange Commission, EDGAR, https://www.sec.gov/edgar/search/ (last visited Nov. 2, 2026).

[10] *See* New Castle County Chamber of Commerce, Business Directory Search for "united futures," https://business.ncccc.com/list/search?q=united+futures&c=&sa=False (last visited Nov. 2, 2026); Chicago

10. On August 24, 2026, just 12 days after its formation, UFI began making federal contributions, kicking off its spending spree with $5 million in contributions that day alone. As detailed in the chart below, over just six weeks between August 24, 2026, and October 8, 2026, UFI made 12 contributions totaling $19,710,000.

United Futures Inc. – Contributions		
Date	**Recipient**	**Amount**
8/24/2026	Mississippi Forward PAC	$3,000,000[11]
8/24/2026	Working Class Majority PAC, Inc.	$2,000,000[12]
8/28/2026	49th State PAC	$2,000,000[13]
8/31/2026	Vote Kansas	$3,200,000[14]
9/1/2026	AB PAC	$30,000[15]
9/10/2026	United Futures PAC	$3,000,000[16]
9/14/2026	AB PAC	$40,000[17]
9/21/2026	AB PAC	$120,000[18]
9/22/2026	49th State PAC	$2,500,000[19]
9/29/2026	Your Community PAC	$2,575,000[20]
10/5/2026	VPP (Voter Protection Project)	$245,000[21]
10/8/2026	Working Class Majority PAC, Inc.	$1,000,000[22]

Southland Chamber of Commerce, Member Directory Search for "united futures," https://business.chicagosouthlandchamber.com/directory/Find?term=united+futures (last visited Nov. 2, 2026).

[11] Mississippi Forward PAC, 2026 Oct. Quarterly Report at 6 (Oct. 15, 2026), https://docquery.fec.gov/pdf/070/202610159908876070/202610159908876070.pdf.

[12] Working Class Majority PAC, Inc., 2026 Oct. Quarterly Report at 12 (Oct. 15, 2026), https://docquery.fec.gov/pdf/459/202610159909086459/202610159909086459.pdf.

[13] 49th State PAC, 2026 Oct. Quarterly Report at 6 (Oct. 15, 2026), https://docquery.fec.gov/pdf/525/202610159909568525/202610159909568525.pdf.

[14] Vote Kansas PAC, 2026 Oct. Quarterly Report at 6 (Oct. 15, 2026), https://docquery.fec.gov/pdf/799/202610159909140799/202610159909140799.pdf.

[15] AB PAC, 2026 Oct. Monthly Report at 49 (Oct. 20, 2026), https://docquery.fec.gov/pdf/556/202610209921425556/202610209921425556.pdf.

[16] UF PAC, 2026 Amend. Oct. Quarterly Report at 7 (Oct. 22, 2026), https://docquery.fec.gov/pdf/606/202610229944871606/202610229944871606.pdf.

[17] AB PAC, 2026 Oct. Monthly Report, *supra* note 15, at 50.

[18] *Id.*

[19] 49th State PAC, 2026 Oct. Quarterly Report, *supra* note 13, at 6.

[20] Your Community PAC, 2026 Oct. Quarterly Report at 8 (Oct. 15, 2026), https://docquery.fec.gov/pdf/607/202610159914623607/202610159914623607.pdf.

[21] VPP, 2026 Pre-General Report at 693 (Oct. 22, 2026), https://docquery.fec.gov/pdf/713/202610229944857713/202610229944857713.pdf.

[22] Working Class Majority PAC, Inc., Amend. 2026 Pre-General Report at 12 (Oct. 29, 2026), https://docquery.fec.gov/pdf/118/202610299945298118/202610299945298118.pdf.

11. UFI used two addresses in connection with its contributions: (1) 300 Delaware Ave., Suite 290, Wilmington, DE 19801, which is the virtual-office address listed on its certificate of incorporation; and (2) 1472 W. Rascher Ave., Chicago, IL 60640, which appears to be a multi-family home.[23]

12. Four of the committees that received contributions from UFI—UF PAC, Mississippi Forward PAC, Vote Kansas, and 49th State PAC—appear to be related to UFI, and to each other. They were all incorporated in Delaware within ten days of each other and share the same mailing address and compliance firm. Moreover, they formed in the same timeframe as UFI, and UFI served as their sole or primary contributor.

United Futures PAC

13. On August 27, 2026—just fifteen days after UFI registered with the Delaware Department of State—United Futures PAC Inc. ("UF PAC") filed its incorporation papers in Delaware.[24] Like UFI, it was incorporated by Alana Mounce and named the Corporation Trust Company as its registered agent.[25] Its listed address is the same virtual workspace that appears on UFI's certificate of incorporation.[26]

14. UF PAC filed its Statement of Organization with the FEC on August 31, 2026, registering as an independent-expenditure only political committee (an "IEOPC" or

[23] *See supra* notes 11–22; *see also* Ex. A; *1472 W. Rascher Ave, Chicago, IL 60640*, Trulia, https://www.trulia.com/home/1472-w-rascher-ave-chicago-il-60640-2126858026 (last visited Oct. 27, 2026).

[24] "United Futures PAC Inc.," Entity Details, DE Dep't of State: Div. of Corps. (attached as Exhibit C).

[25] *Id.*

[26] *Compare id.*, *with* Ex. A.

"super PAC") and designating Christoper Koob of MBA Consulting Group as its treasurer.[27] It reported its mailing address as PO Box 15845, Washington, DC 20003.[28]

15. UF PAC's website is a barebones, single page with the PAC's contact information (a PO box, email address, and telephone number) and a two-paragraph statement about its mission.[29] The website does not include a donation link or provide any other way to contribute or support the organization.[30]

16. As outlined in the chart above, UF PAC reported receiving a $3 million contribution from UFI on September 10, 2026, ten days after the PAC registered with the FEC, and less than a month after UFI was incorporated.[31] According to its disclosure reports, which cover the period from its formation through October 14, 2026, UF PAC has reported receiving no other contributions besides the $3 million it received from UFI.[32]

17. UF PAC has reported making almost $3.2 million in independent expenditures ("IEs")—*i.e.*, communications expressly advocating the election or defeat of a clearly identified federal candidate made without coordinating with any candidate or political party[33]—since September 16, 2026, when it first began disseminating political advertising.[34] Its

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[27] UF PAC, Statement of Org. at 1–2 (Aug. 31, 2026), https://docquery.fec.gov/pdf/087/202608319904050087/202608319904050087.pdf; *see Team*, MBA Consulting Group, https://mbacg.com/team/ (last visited Oct. 30, 2026).

[28] UF PAC, Statement of Org., *supra* note 27, at 1.

[29] United Futures PAC, https://perma.cc/NU6T-YEYD (last visited Nov. 2, 2026).

[30] *Id.*

[31] UF PAC, 2026 Amend. Oct. Quarterly Report, *supra* note 16, at 7.

[32] *See id.*; UF PAC, 2026 Pre-General Report (Oct. 22, 2026), https://docquery.fec.gov/pdf/964/202610229944881964/202610229944881964.pdf.

[33] *See* 52 U.S.C. § 30101(17); 11 C.F.R. § 100.16.

[34] *See* UF PAC, 24- and 48-Hour Reports, FEC, https://www.fec.gov/data/committee/C00960385/?tab=filings (last visited Oct. 27, 2026). The figure comes from aggregating data from UF PAC's 24- and 48-hour reports, filed between September 18 and November 1, 2026. *See id.* UF PAC has reported spending more on IEs than it has disclosed raising. It is either taking on debt to finance some of its communications, has accepted additional contributions that are not due to be disclosed until its upcoming post-general report, or has inaccurately reported its receipts.

communications have included digital advertisements, phone calls, text messages, digital/mobile billboards, canvassing materials, and airplane banners.[35]

18. In addition, UF PAC has reportedly made multiple contributions to other super PACs, including BOLD America, Fulcrum PAC, Neighbor Voices PAC, and People Over Politics Action Fund.[36] However, while BOLD America reported receiving $1.3 million from UF PAC on September 23, 2026,[37] UF PAC never disclosed making this contribution on any of its reports.[38] Similarly, while People Over Politics Action Fund reported receiving two contributions from UF PAC—$2 million on August 28, 2026, and $4.25 million on September 22, 2026[39]—UF PAC has not reported making those contributions.[40]

Mississippi Forward PAC

19. Mississippi Forward PAC registered in Delaware as an exempt organization on August 17, 2026—five days after UFI registered in Delaware—and it likewise designated the Corporation Trust Company as its registered agent.[41] It registered as a super PAC with the FEC one day later, on August 18, 2026.[42] It designated Steven Mele, also of MBA

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[35] *See id.*

[36] UF PAC, 2026 Amend. Oct. Quarterly Report, *supra* note 16, at 11; UF PAC, 2026 Pre-General Report, *supra* note 32, at 12; Bold America, 2026 Oct. Monthly Report at 7 (Sept. 30, 2026), https://docquery.fec.gov/pdf/218/202610209921311218/202610209921311218.pdf.

[37] Bold America, 2026 Oct. Monthly Report, *supra* note 36, at 7.

[38] *See* UF PAC, 2026 Amend. Oct. Quarterly Report, *supra* note 16; UF PAC, 2026 Pre-General Report, *supra* note 32.

[39] People Over Politics Action Fund, 2026 Oct. Quarterly Report at 11–12 (Oct. 13, 2026), https://docquery.fec.gov/pdf/633/202610139908683633/202610139908683633.pdf.

[40] *See* UF PAC, 2026 Amend. Oct. Quarterly Report, *supra* note 16; UF PAC, 2026 Pre-General Report, *supra* note 32.

[41] "Mississippi Forward PAC, Inc.," Entity Details, DE Dep't of State: Div. of Corps. (attached as Exhibit D).

[42] Mississippi Forward PAC, Statement of Org. at 1–2 (Aug. 18, 2026), https://docquery.fec.gov/pdf/420/202608189899553420/202608189899553420.pdf.

Consulting, as its treasurer, and reported the same mailing address as UF PAC (PO Box 15845, Washington, DC 20003).[43]

20. On August 24, 2026—less than a week after Mississippi Forward registered as a PAC, and less than two weeks after UFI formed—UFI made a $3 million contribution to Mississippi Forward.[44] Mississippi Forward has not reported receiving any other contributions.[45]

21. While Mississippi Forward has not reported any IEs, it has reported spending about $2.1 million, with the majority of that sum going toward canvassing.[46]

Vote Kansas

22. On August 26, 2026—two weeks after UFI was formed—Vote Kansas registered as a Delaware exempt corporation and named the Corporation Trust Company as its registered agent.[47] It registered as a super PAC with the FEC a day later, on August 27, 2026.[48] Christopher Koob of MBA Consultants is Vote Kansas's treasurer, and Vote Kansas uses the same PO Box as UF PAC and Mississippi Forward (PO Box 15845, Washington, DC 20003).[49] Vote Kansas does not appear to maintain a website or have any other mechanism for soliciting contributions.

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[43] *Id.* at 1; *Team*, MBA Consulting Group, *supra* note 27.

[44] Mississippi Forward PAC, 2026 Oct. Quarterly Report, *supra* note 11, at 6.

[45] *See id.*; Mississippi Forward PAC, 2026 Pre-General Report at 6–16 (Oct. 22, 2026), https://docquery.fec.gov/pdf/794/202610229940993794/202610229940993794.pdf.

[46] *See* sources cited *supra* note 45. The super PAC's disclosure of these canvassing costs as operating expenditures, rather than IEs, appears to indicate that these canvasses were coordinated with one or more federal candidates. *See* Advisory Op. 2024-01 (Texas Majority PAC), https://www.fec.gov/files/legal/aos/2024-01/2024-01.pdf (construing FEC regulations to permit coordination on canvassing activities between candidates and independent entities permitted to raise and spend unlimited funds); *see also* Brendan Fischer & Sophia Gonsalves-Brown, *How Super PACs Are Hiding Tens of Millions of Dollars in Candidate Spending*, Campaign Legal Center (Oct. 30, 2026), https://campaignlegal.org/document/how-super-pacs-are-hiding-tens-millions-dollars-candidate-spending.

[47] "Vote Kansas, Inc.," Entity Details, DE Dep't of State: Div. of Corps. (attached as Exhibit E).

[48] Vote Kansas, Statemen of Org. at 1–2 (Aug. 27, 2026), https://docquery.fec.gov/pdf/811/202608279903406811/202608279903406811.pdf.

[49] *Id.* at 1; *Team*, MBA Consulting Group, *supra* note 27.

23. On August 31, 2026—four days after Vote Kansas registered with the FEC and less than three weeks after UFI was formed—UFI contributed $3.2 million to Vote Kansas.[50] Vote Kansas has not reported receiving any other contributions.[51]

24. Vote Kansas has not reported making any IEs, but it has reported spending about $1.3 million, and like Mississippi Forward, the vast majority of that amount was for canvassing that appears to have been coordinated with one or more federal candidates, based on the super PAC's disclosure of these costs as operating, rather than independent, expenditures.[52]

49th State PAC

25. 49th State PAC registered as a Delaware exempt corporation—with the Corporation Trust Company as its registered agent—on August 20, 2026, just eight days after UFI registered.[53] Two days later, it registered with the FEC as a super PAC on August 22, 2026.[54] It named Steven Mele of MBA Consultants as its treasurer and listed the same PO box as the other three super PACs as its mailing address (PO Box 15845, Washington, DC 20003).[55] 49th State PAC maintains a barebones website that provides no way to contact the PAC or make a contribution.[56]

26. On August 28, 2026—six days after 49th State PAC registered with the FEC and a little over two weeks after UFI was created—UFI made a $2 million contribution to 49th State

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[50] Vote Kansas PAC, 2026 Oct. Quarterly Report, *supra* note 14, at 6.

[51] *See id.*; Vote Kansas PAC, 2026 Pre-General Report (Oct. 22, 2026), https://docquery.fec.gov/pdf/757/202610229937679757/202610229937679757.pdf.

[52] *See* sources cited *supra* note 51.

[53] "49th State PAC, Inc.," Entity Details, DE Dep't of State: Div. of Corps. (attached as Exhibit F).

[54] 49th State PAC, Statement of Org. at 1–2 (Aug. 22, 2026), https://docquery.fec.gov/pdf/671/202608229903381671/202608229903381671.pdf.

[55] *Id.* at 1; *Team*, MBA Consulting Group, *supra* note 27.

[56] *See* 49th State PAC, https://perma.cc/3W8V-7EB9 (last visited Nov. 2, 2026).

PAC.[57] UFI then made a second contribution of $2.5 million on September 22, 2026.[58] UFI is one of only two contributors to 49th State PAC and is by far the larger donor—providing 90% of the super PAC's reported funding.[59]

27. 49th State PAC has spent about $2.5 million, according to its most recent FEC report.[60] It has not reported any IEs, but like Mississippi Forward and Vote Kansas, it has spent heavily on canvassing efforts that appear to have been coordinated with one or more federal candidates.[61]

28. For clarity, a timeline of the events described in the preceding paragraphs appears below.

Timeline of Events
August 12, 2026 – United Futures Inc. ("UFI") registers in Delaware.
August 17, 2026 – Mississippi Forward PAC registers in Delaware.
August 18, 2026 – Mississippi Forward PAC registers with the FEC.
August 20, 2026 – 49th State PAC registers in Delaware.
August 22, 2026 – 49th State PAC registers with the FEC.
August 24, 2026 – UFI contributes $3 million to Mississippi Forward PAC. UFI contributes $2 million to Working Class Majority PAC, Inc.
August 26, 2026 – Vote Kansas registers in Delaware.
August 27, 2026 – Vote Kansas registers with the FEC. United Futures PAC registers in Delaware.
August 28, 2026 – UFI contributes $2 million to 49th State PAC.
August 31, 2026 – UFI contributes $3.2 million to Vote Kansas.

[57] 49th State PAC, 2026 Oct. Quarterly Report, *supra* note 13, at 6.

[58] *Id.*

[59] *Id.*; 49th State PAC, 2026 Pre-General Report (Oct. 20, 2026), https://docquery.fec.gov/pdf/587/202610209916347587/202610209916347587.pdf. The other contributor, Green Advocacy Project, contributed $500,000 compared to UFI's $4.5 million. 49th State PAC, 2026 Oct. Quarterly Report, *supra* note 13, at 6.

[60] 49th State PAC, 2026 Pre-General Report, *supra* note 59, at 4.

[61] *See* sources cited *supra* notes 13, 59.

August 31, 2026 – United Futures PAC registers with the FEC.

September 1, 2026 – UFI contributes $30,000 to AB PAC.

September 10, 2026 – UFI contributes $3 million to United Futures PAC.

September 14, 2026 – UFI contributes $40,000 to AB PAC.

September 21, 2026 – UFI contributes $120,000 to AB PAC.

September 22, 2026 – UFI contributes $2.5 million to 49th State PAC.

September 29, 2026 – UFI contributes $2,575,000 to Your Community PAC.

October 5, 2026 – UFI contributes $245,000 to VPP (Voter Protection Project).

October 8, 2026 – UFI contributes $1 million to Working Class Majority PAC, Inc.

SUMMARY OF THE LAW

29. 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."[62] The reason-to-believe finding is a threshold determination and "does not establish that the law has been violated."[63] The Commission uses the ensuing investigation "to determine whether a violation in fact occurred and, if so, its exact scope."[64] 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.[65]

[62] 52 U.S.C. § 30109(a)(2); *see* 11 C.F.R. § 111.10(a).

[63] 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.

[64] *Id.*

[65] *Id.*

Reporting Requirements

30. FECA requires each treasurer of a political committee to file regular reports of receipts and disbursements with the Commission.[66] Each report must provide, *inter alia*, the name and address of each person who contributes more than $200 in the aggregate to a committee during a calendar year, and the name and address of any political committee to which the reporting committee made a contribution during the reporting period, together with the amount and date of the contribution.[67]

31. The requirement to completely and accurately report a committee's receipts and disbursements in a timely manner serves multiple important government interests, including allowing voters to cast an informed ballot, deterring unlawful activity, and providing the data necessary to detect and remedy unlawful contributions or expenditures.[68]

Contributions in the Name of Another

32. FECA also 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."[69]

33. The Commission regulation implementing the statutory prohibition provides the following examples of contributions in the name of another:

    a. "Giving money or anything of value, all or part of which was provided to the contributor by another person (the true contributor) without disclosing the source of

[66] 52 U.S.C. § 30104(a)(1); 11 C.F.R. § 104.1(a).
[67] 52 U.S.C. § 30104(b)(3)(A), (b)(6)(B)(i); 11 C.F.R. §§ 104.3(a)(4)(i), (b)(3)(v), 100.12.
[68] *Buckley v. Valeo*, 424 U.S. 1, 67–68 (1976).
[69] 52 U.S.C. § 30122.

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."[70]

34. 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,[71] and ensures that the public is fully informed about the true sources of political contributions and expenditures. Such transparency also enables voters, including complainant Wieand, to have the information necessary to evaluate candidates for office, "make informed decisions[,] and give proper weight to different speakers and messages."[72]

35. 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.[73] Moreover, the "key issue . . . is the source of the funds" and, therefore, the legal status of the funds

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[70] 11 C.F.R. § 110.4(b)(2)(i)–(ii).

[71] *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).

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

[73] *See United States v. Boender*, 649 F.3d 650, 660 (7th Cir. 2011) (holding that to determine who made a contribution "we consider the giver to be the source of the gift, not any intermediary who simply conveys the gift from the donor to the donee"); *O'Donnell*, 608 F.3d at 550, 555; *Goland v. United States*, 903 F.2d 1247, 1251 (9th Cir. 1990) ("[FECA] prohibits the use of 'conduits' to circumvent . . . [reporting] restrictions.").

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]."[74]

36. On April 1, 2016, then-Chair Petersen and then-Commissioners Hunter and Goodman issued a Statement of Reasons explaining their view regarding "the appropriate standard" to apply "in future matters" raising the allegation that an LLC was used to facilitate a contribution in the name of another.[75] The Commissioners explained that in their view, "the proper focus in these matters is whether the funds used to make a contribution were intentionally funneled through a closely held corporation or corporate LLC for the purpose of making a contribution that evades the Act's reporting requirements, making the individual, not the corporation or corporate LLC, the true source of the funds."[76] The relevant factors that these Commissioners indicated they would consider included:

> [whether] there is evidence indicating that the corporate entity did not have income from assets, investment earnings, business revenues, or bona fide capital investments, or was created and operated for the sole purpose of making political contributions. These facts would suggest the corporate entity is a straw donor and not the true source of the contribution.[77]

37. An April 15, 2022, Statement of Reasons by then-Chairman Allen Dickerson, then-Vice Chair Steven T. Walther, and Commissioners Shana M. Broussard and Ellen L. Weintraub reiterated that the public is now on notice that FECA's straw donor ban and

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[74] *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).

[75] Statement of Reasons of Chairman Matthew S. Petersen & Commissioners Caroline C. Hunter & Lee E. Goodman at 2, MURs 6485, 6487, 6488, 6711, 6930 (W Spann LLC, *et al.*) (Apr. 1, 2016), https://www.fec.gov/files/legal/murs/6487/16044391129.pdf.

[76] *Id.*

[77] *Id.* at 12.

Commission regulations implementing that provision — *i.e.*, the "conduit contribution rules" — apply when LLCs purport to make contributions to IEOPCs:

> [T]he Commission [previously] did not agree whether, following *Citizens United* and *SpeechNow.org v. FEC*, respondent committees had received adequate notice that the Commission's LLC reporting rules and conduit contribution rules applied to contributions made to the newly formed IEOPCs authorized by those judicial rulings. With the passage of time, IEOPCs have become a regular part of the campaign finance landscape, and adequate notice to the public now exists. Consequently, there is *no longer a lack of clarity* concerning the application of LLC reporting rules and conduit contribution rules in these circumstances.[78]

Accordingly, the FEC has made clear that the public is "on notice" that the straw donor ban applies in such circumstances, and thus prohibits any person from funneling a contribution to an IEOPC through an LLC or similar entity.

38. In MUR 7903, the Commission found reason to believe that "Tomfoolery LLC" and its single member, Thomas Chavez, violated Section 30122 when Chavez provided funds to the 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."[79] The Commission subsequently entered into a conciliation agreement with Tomfoolery LLC and Chavez, which included a $25,000 civil penalty.[80]

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[78] Statement of Reasons of Chairman Allen Dickerson, Vice Chair Steven T. Walther & Commissioners Shana M. Broussard & Ellen L. Weintraub at 2, MUR 7454 (Blue Magnolia Investments, LLC) (Apr. 15, 2022) (emphases added), https://www.fec.gov/files/legal/murs/7454/7454_36.pdf.

[79] 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 ("Tomfoolery F&LA").

[80] *See* Conciliation Agreement ¶ VI, MUR 7903 (Tomfoolery LLC, *et al.*) (Oct. 3, 2022), https://www.fec.gov/files/legal/murs/7903/7903_16.pdf.

39. 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.[81]

40. 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.[82] 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.[83]

41. As these and other prior cases illustrate, straw donor contributions like those alleged here are serious violations of federal campaign finance law that have led to criminal indictments and convictions.[84] As explained in one such indictment, the 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, campaign committees, federal regulators, and

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[81] *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.

[82] *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.

[83] *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.

[84] *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-giuiliani.html; Dep't of Justice, *Lev Parnas and Igor Fruman Charged with Conspiring to Violate Straw and Foreign Donor Bans* (Oct. 10, 2019), https://www.justice.gov/usao-sdny/pr/lev-parnas-and-igor-fruman-charged-conspiring-violate-straw-and-foreign-donor-bans; Dep't of Justice, *Entertainer/Businessman and Malaysian Financier Indicted for Conspiring to Make and Conceal Foreign and Conduit Contributions During 2012 U.S. Presidential Election* (May 10, 2019), https://www.justice.gov/opa/pr/entertainerbusinessman-and-malaysian-financier-indicted-conspiring-make-and-conceal-foreign.

the public are informed of the true sources of money spent to influence federal elections.[85] Another indictment highlighted how straw donor schemes have been used to skirt FECA's source prohibitions, such as the ban on contributions by government contractors.[86]

42. 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.

CAUSES OF ACTION

COUNT I:
UFI, UF PAC, MISSISSIPPI FORWARD PAC, VOTE KANSAS, 49TH STATE PAC, AND THE UNKNOWN PERSON(S) WHO MADE CONTRIBUTIONS IN UFI'S NAME VIOLATED 52 U.S.C. § 30122

United Futures, Inc. and the Unknown True Contributors

43. The available information indicates that UFI was set up and used as a straw donor to funnel money to various super PACs actively influencing the 2026 election in its final weeks, as UFI plainly did not have the means to contribute nearly $20 million within two months of its August 2026 formation without one or more other persons providing funds to it for that purpose. As such, these other persons were, in fact, the true source(s) of the

[85] 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.

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

contributions made in UFI's name to multiple super PACs, including UF PAC, Mississippi Forward PAC, Vote Kansas, and 49th State PAC.

44. UFI was registered as a Delaware corporation on August 12, 2026, by Alana Mounce, who appears to have previously worked as a high-level political operative for multiple presidential candidates and the national committee of a political party.[87] Only twelve days later, on August 24, 2026, UFI purported to make a $3 million contribution to Mississippi Forward and a $2 million contribution to Working Class Majority PAC, Inc.,[88] despite UFI having engaged in no apparent activity from which it could have generated $5 million to make political contributions in its own name.[89] Then, within just six weeks, UFI made at least *ten* more contributions totaling $19.7 million.[90]

45. During the brief span of time between its formation and purporting to make nearly $20 million in contributions in its own name, UFI does not appear to have engaged in any activity from which it could have garnered the funds with which to contribute such large sums. Indeed, UFI appears to exist solely on paper and have been formed for a political purpose—it has no presence online, has listed a virtual office and a residential home as its addresses, does not appear to either generate or solicit money, and was formed by a well-known political operative active in federal elections. There are no public records or news articles that provide any information about its activities beyond the contributions at issue.[91] As such, UFI appears to have "lacked the financial wherewithal to make the [$19.7 million in] contribution[s] to [the committees] on its own."[92]

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87 *See* Exs. A–B.
88 *See supra* ¶ 10.
89 *See supra* ¶ 9.
90 *See supra* ¶ 10.
91 *See supra* ¶¶ 6–9.
92 Tomfoolery F&LA at 5.

46. It is utterly implausible that a nascent, less-than-two-month-old entity with no activity could have acquired sufficient funds to enable it to make $19.7 million of contributions in its own name, with its own funds. UFI instead appears to have been formed and used as a straw donor to facilitate political spending on the 2026 election, while unlawfully concealing the source(s) of that spending.

47. 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 public—fundamentally 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.

48. Accordingly, based on the foregoing, there is reason to believe that the unidentified person(s) who contributed $19.7 million to federal super PACs in the name of UFI violated 52 U.S.C. § 30122 by making contributions in the name of another, and that UFI violated 52 U.S.C. § 30122 by knowingly permitting its name to be used to effect the contributions of one or more other persons in its own name.

United Futures PAC, Mississippi Forward PAC, Vote Kansas, and 49th State PAC

49. Furthermore, the available information supports finding reason to believe that UF PAC, Mississippi Forward PAC, Vote Kansas, and 49th State PAC—four of the super PACs receiving funds from UFI—have violated 52 U.S.C. § 30122 by knowingly accepting contributions in the name of another.

50. All four of these super PACs registered in Delaware within 10 days of each other, and within 15 days of UFI's registration, also in Delaware.[93] All four of these super PACs also provided the same registered agent, mailing address, and compliance firm, and UF PAC—the entity whose name makes it the most obviously and openly affiliated with UFI—was, like UFI, also incorporated by Alana Mounce and provided the same virtual office address as UFI on its certificate of incorporation.[94]

51. UFI is also the sole or overwhelming source of funding for each of these four super PACs. UF PAC, Mississippi Forward PAC, and Vote Kansas have each received millions of dollars from UFI and have reported receiving no money from any other source.[95] 49th State PAC received the vast majority of its funds—$4.5 million, comprising 90% of its funding—from UFI, with one other contributor providing a $500,000 contribution.[96] Indeed, three out of the four super PACs (UF PAC, Vote Kansas, and 49th State PAC) do not appear to even have any published mechanism for the public to financially support them, while Mississippi Forward—whose website does feature a "contribute" link—has reported receiving no such support.[97] These facts strongly indicate that these super PACs

[93] *See* Exs. A, C–F.
[94] *See* Exs. A, C–F; *see supra* ¶¶ 13–14, 19, 22, 25.
[95] *See supra* ¶¶ 16, 20, 23.
[96] *See supra* ¶ 26 & n.59.
[97] *See supra* ¶¶ 15, 22, 25; *see also* Mississippi Forward, https://msfwd.org/ (last visited Nov. 1, 2026).

never intended to raise funds from the public; they were, instead, established to rely entirely on the millions of dollars that the unknown true contributors behind this overarching scheme funneled through UFI to finance their electoral influence operations.

52. Moreover, immediately after receiving funding from UFI, these super PACs initiated an apparently choreographed effort to support particular candidates in the weeks before the 2026 midterm elections. UF PAC—the super PAC whose name openly links it to UFI—functioned more like a traditional super PAC, spending most of its money on IEs targeting candidates and races in multiple states, including Alaska, Kansas, Mississippi, North Carolina, Nebraska, and South Carolina.[98] The other three super PACs, each of which had a state-specific name (Mississippi Forward PAC, Vote Kansas, and 49th State PAC, a clear reference to Alaska) that implied a local connection to the race they sought to influence, engaged in voter canvassing operations—almost certainly coordinated with the candidate(s) they supported in the state their name affiliated them with.[99] Indeed, the fact that these three super PACs appear to have exclusively financed canvassing reported as operating expenditures (rather than IEs) indicates that they were designated to coordinate canvassing with the relevant candidates in each state, rather than disseminating election ads that would have remain independent of candidates.[100]

53. The use of this multi-group, complementary setup—with coordinated canvassing exclusively handled by certain super PACs and independent election advertising handled by others—strongly suggests a pre-planned and well-choreographed electoral influence operation. That, in turn, underscores that the super PACs involved appear to have

[98] *See supra* ¶¶ 17–18 & n.34.
[99] *See supra* ¶¶ 21, 24, 27.
[100] *See* Advisory Op. 2024-01 (Texas Majority PAC).

knowingly accepted funds unlawfully funneled to them through UFI in order to conceal the true contributors' identities.

54. Viewed as a whole, the available information—including the compressed timeframe of events; the shared incorporation state, registered agent, treasurers, and address; the fact that Mounce incorporated UFI and UF PAC and that UFI supplied nearly every dollar provided to the four super PACs in question; and the apparently pre-planned and coordinated nature of the scheme—indicates that these super PACs were part of the same network, for which UFI acted as a financial clearinghouse. It is therefore utterly implausible that these super PACs did not know the identities of the true contributors providing funds to UFI for the purpose of financing their electoral influence efforts.

55. Accordingly, the overall record supports finding reason to believe that UF PAC, Mississippi Forward PAC, Vote Kansas, and 49th State PAC knew that UFI was not the true source of the contributions made in its name, *i.e.*, that the four super PACs violated 52 U.S.C. § 30122 by knowingly accepting contributions in the name of another.

COUNT II:
UF PAC VIOLATED 52 U.S.C. § 30104(B)(6)(B)(I) BY FAILING TO REPORT MAKING CONTRIBUTIONS TO OTHER PACS

56. BOLD PAC and People Over Politics Action Fund have reported the receipt of three contributions totaling over $7.5 million from UF PAC, while UF PAC has never reported making these contributions. As such, there is reason to believe that UF PAC has violated federal reporting requirements by not disclosing the contributions it made to other political committees.

57. BOLD PAC's 2026 October Monthly Report states that it received a $1.3 million contribution from UF PAC on September 23, 2026.[101] However, UF PAC did not report making this contribution on its October Quarterly Report—where the contribution should have appeared—or its later-filed Pre-General Report.[102] Indeed, this contribution appears nowhere in UF PAC's disclosure reports.

58. Similarly, People Over Politics Action Fund's 2026 October Quarterly Report states that it received two contributions from UF PAC: $2 million on August 28, 2026, and $4.25 million on September 22, 2026.[103] However, UF PAC has not reported making these contributions, either.[104]

59. UF PAC's failure to disclose these contributions makes it impossible to look at UF PAC's disclosure reports and understand how it is spending its money, as FECA plainly requires, thus denying voters the transparency and accountability that FECA promises.

60. Accordingly, there is reason to believe UF PAC violated 52 U.S.C. § 30104(b)(6)(B)(i).

[101] Bold America, 2026 Oct. Monthly Report, *supra* note 36, at 7.

[102] *See* UF PAC, 2026 Amend. Oct. Quarterly Report, *supra* note 16; UF PAC, 2026 Pre-General Report, *supra* note 32.

[103] *See* People Over Politics Action Fund, 2026 Oct. Quarterly Report, *supra* note 39, at 11–12.

[104] *See* UF PAC, 2026 Amend. Oct. Quarterly Report, *supra* note 16; UF PAC, 2026 Pre-General Report, *supra* note 32.

PRAYER FOR RELIEF

61. Wherefore, the Commission should find reason to believe that UFI, UF PAC, Mississippi Forward PAC, Vote Kansas, 49th State PAC, and any person(s) who made contributions in UFI's name have violated 52 U.S.C. § 30101 *et seq.*, and conduct an immediate investigation under 52 U.S.C. § 30109(a)(2).

62. 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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1333 New Hampshire Ave. NW, Suite 300
Washington, DC 20036
(202) 736-2200

/s/ Roger G. Wieand
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Saurav Ghosh, Esq.
Campaign Legal Center
1333 New Hampshire Ave. NW, Suite 300
Washington, DC 20036
Counsel to the Campaign Legal Center,
Roger G. Wieand

November 2, 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 Roger G. Wieand

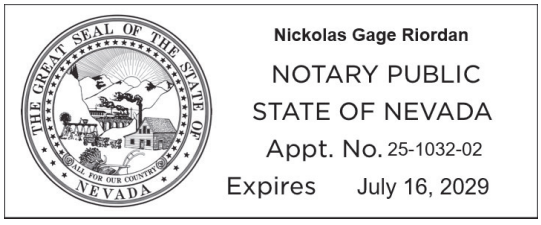


Roger G. Wieand

Sworn to and subscribed before me this 2nd day of November 2026.



Notary Public State of: Nevada County of: Washoe



Notarized remotely using audio-video communication technology via Proof.

VERIFICATION

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

Sworn pursuant to 18 U.S.C. § 1001.

For Complainant Campaign Legal Center

Saurav Ghosh

Saurav Ghosh, Esq.

Sworn to and subscribed before me this 2nd day of November 2026.

Stephanie Christine Sharper

Notary Public

Commonwealth of Pennsylvania - Notary Seal
Stephanie Christine Sharper, Notary Public
Philadelphia County
My commission expires June 18, 2029
Commission Number 1398268

Notarized remotely online using communication technology via Proof.

Exhibit A

Docusign Envelope ID: 0362EA72-82FE-8DD8-83F0-AFCF6F79EC06

STATE OF DELAWARE
CERTIFICATE OF INCORPORATION
A NON-STOCK CORPORATION

The undersigned Incorporator hereby certifies as follows:

1. The name of the Corporation is United Futures Inc.

2. The Registered Office of the corporation in the State of Delaware is located at 1209 Orange Street (street), in the City of Wilmington, County of New Castle Zip Code 19801. The name of the Registered Agent at such address upon whom process against this corporation may be served is The Corporation Trust Company.

3. The purpose of the corporation is to engage in any lawful act or activity for which corporations may be organized under the General Corporation Law of Delaware. (If the Corporation is to be a nonprofit corporation, please add: "This Corporation shall be a nonprofit corporation.") This Corporation shall be a nonprofit corporation.

4. The corporation shall not have any capital stock.

5. The conditions of membership are provided in the bylaws of the corporation.

6. The name and mailing address of the incorporator are as follows:
   Name Alana Mounce
   Mailing Address 300 Delaware Ave, Ste 210 #290
   Wilmington, DE Zip Code 19801

DocuSigned by:
By: Alana Mounce
2B93664FA34E4B3...
Incorporator

Name: Alana Mounce
Print or Type

State of Delaware
Secretary of State
Division of Corporations
Delivered 11:06 AM 08/12/2026
FILED 11:06 AM 08/12/2026
SR 20264044493 - File Number 10731816

Exhibit B



Alana Mounce
Political Director at Harris for President

Experience

Political Director
Harris for President · Full-time
Mar 2024 - Dec 2024 · 10 mos

Ballot Access Director
Biden for President · Full-time
Aug 2023 - Mar 2024 · 8 mos



Deputy Director of the Office of Political Strategy and Outreach
The White House · Full-time
Jul 2022 - Aug 2023 · 1 yr 2 mos

Political Director
Democratic National Committee · Full-time
Mar 2021 - Jul 2022 · 1 yr 5 mos

Chief of Staff
59th Presidential Inaugural Committee (PIC) · Full-time
Nov 2020 - Jan 2021 · 3 mos

Nevada State Director
Biden for President · Full-time
Jun 2020 - Nov 2020 · 6 mos

Executive Director
Nevada State Democratic Party · Full-time
Jul 2017 - Jun 2020 · 3 yrs

Exhibit C

State of Delaware
Secretary of State
Division of Corporations
Delivered 05:29 PM 08/27/2026
FILED 05:29 PM 08/27/2026
SR 20264223983 - File Number 10750620

STATE OF DELAWARE
CERTIFICATE OF INCORPORATION
A NON-STOCK CORPORATION

The undersigned Incorporator hereby certifies as follows:

1. The name of the Corporation is United Futures PAC Inc.

2. The Registered Office of the corporation in the State of Delaware is located at 1209 Orange Street (street), in the City of Wilmington, County of New Castle Zip Code 19801. The name of the Registered Agent at such address upon whom process against this corporation may be served is The Corporation Trust Company.

3. The purpose of the corporation is to engage in any lawful act or activity for which corporations may be organized under the General Corporation Law of Delaware. (If the Corporation is to be a nonprofit corporation, please add: "This Corporation shall be a nonprofit corporation.") This Corporation shall be a nonprofit corporation.

4. The corporation shall not have any capital stock.

5. The conditions of membership are provided in the bylaws of the corporation.

6. The name and mailing address of the incorporator are as follows:
   Name Alana Mounce
   Mailing Address 300 Delaware Ave, Ste 210 #290
   Wilmington, DE Zip Code 19801

By: Alana Mounce
Incorporator

Name: Alana Mounce
Print or Type

Exhibit D

Department of State: Division of Corporations

Allowable Characters

HOME

Entity Details

THIS IS NOT A STATEMENT OF GOOD STANDING

File Number:	**10737137**	Incorporation Date / Formation Date:	**8/17/2026** (mm/dd/yyyy)
Entity Name:	**MISSISSIPPI FORWARD PAC, INC.**		
Entity Kind:	**Corporation**	Entity Type:	**Exempt**
Residency:	**Domestic**	State:	**DELAWARE**

REGISTERED AGENT INFORMATION

Name:	**THE CORPORATION TRUST COMPANY**		
Address:	**CORPORATION TRUST CENTER 1209 ORANGE ST**		
City:	**WILMINGTON**	County:	**New Castle**
State:	**DE**	Postal Code:	**19801**
Phone:	**302-658-7581**		

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

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Exhibit E

Department of State: Division of Corporations

Allowable Characters

HOME

Entity Details

THIS IS NOT A STATEMENT OF GOOD STANDING

File Number:	**10747744**	Incorporation Date / Formation Date:	**8/26/2026** (mm/dd/yyyy)
Entity Name:	**VOTE KANSAS, INC.**		
Entity Kind:	**Corporation**	Entity Type:	**Exempt**
Residency:	**Domestic**	State:	**DELAWARE**

REGISTERED AGENT INFORMATION

Name:	**THE CORPORATION TRUST COMPANY**		
Address:	**CORPORATION TRUST CENTER 1209 ORANGE ST**		
City:	**WILMINGTON**	County:	**New Castle**
State:	**DE**	Postal Code:	**19801**
Phone:	**302-658-7581**		

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

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Exhibit F

Department of State: Division of Corporations

Allowable Characters

HOME

Entity Details

THIS IS NOT A STATEMENT OF GOOD STANDING

File Number:	**10742405**	Incorporation Date / Formation Date:	**8/20/2026** (mm/dd/yyyy)
Entity Name:	**49TH STATE PAC, INC.**		
Entity Kind:	**Corporation**	Entity Type:	**Exempt**
Residency:	**Domestic**	State:	**DELAWARE**

REGISTERED AGENT INFORMATION

Name:	**THE CORPORATION TRUST COMPANY**		
Address:	**CORPORATION TRUST CENTER 1209 ORANGE ST**		
City:	**WILMINGTON**	County:	**New Castle**
State:	**DE**	Postal Code:	**19801**
Phone:	**302-658-7581**		

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

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