

**BEFORE THE
FEDERAL ELECTION COMMISSION**

Tiffany Muller
End Citizens United
PO Box 66005
Washington, DC 20035

Complainant,

v.

George Anthony Devolder-Santos
9002 Queens Boulevard
Elmhurst, NY 11373

Devolder-Santos for Congress and Nancy Marks, in her official capacity as treasurer
47 Flintlock Drive
Shirley, NY 11967

Devolder Organization LLC
801 Del Rio Way # 602
Merrit Island, FL 32953

Respondents.

COMPLAINT

This complaint is filed under 52 U.S.C. § 30109(a)(1) against George Anthony Devolder-Santos (“George Santos”), Devolder-Santos for Congress (the “Campaign”), Nancy Marks, in her official capacity as treasurer, and Devolder Organization LLC for violating provisions of the Federal Election Campaign Act of 1971, as amended (the “Act”), and Federal Election Commission (the “FEC” or “Commission”) regulations. Based on public reports, including reports filed with the Commission, there is reason to believe that George Santos, who recently won election to the U.S. House of Representatives, along with the other Respondents, may have

committed several egregious violations of the Act and Commission regulations during the 2022 campaign cycle.

Recent reporting indicates that Mr. Santos may have funded the more than \$700,000 in loans he made to his Campaign using funds from a company he purportedly owned or, in the alternative, using the company as a “shell” to disguise the true sources of the contributions, in violation of Act’s strict ban on corporation contributions and contributions in the name of another.¹ Additionally, the Campaign disclosed hundreds of expenditures in amounts under \$200, with nearly 40 disbursements in the precise amount of \$199.99, apparently to skirt the Act’s recordkeeping requirements. There is also reason to believe that Campaign may have violated the Act’s personal use prohibition by making rental payments at a home where Mr. Santos was living.²

If the Commission “upon receiving a complaint . . . has reason to believe that a person has committed, or is about to commit, a violation of the Act . . . the Commission *shall* make an investigation of such alleged violation.”³ A “reason to believe” finding is appropriate where the complaint credibly alleges a significant violation may have occurred, but further investigation is required to determine whether a violation occurred and, if so, its scope.⁴ As further explained below, the Commission should act immediately to investigate Respondents’ actions and seek the appropriate financial penalties.

¹ The Campaign also failed to properly file a Statement of Organization until November 2021, more than seven months after Mr. Santos filed his Statement of Candidacy with the Commission.

² 52 U.S.C. § 30125(e)(1)(A)-(B); 11 C.F.R. §§ 300.61-.62.

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

⁴ *Id.*

BACKGROUND

George Santos was elected to the U.S. House of Representatives for New York's 3rd Congressional District in the November 2022 general election.⁵ He filed his Statement of Candidacy on April 17, 2021.⁶ Seven months later, on November 5, 2021, his campaign committee, Devolder-Santos for Congress and Nancy Marks in her official capacity as treasurer, filed its Statement of Organization.⁷ During his candidacy, Mr. Santos reported that he used personal funds to donate a total of \$705,000 to his campaign.⁸

In mid-December 2022, Mr. Santos admitted to falsifying information “about his professional background, educational history, and property ownership” after allegations surfaced about the same.⁹ As a result, important questions have been raised about the origin of the funds used to make loans to his campaign, the accuracy of his disclosure reports, and whether certain expenses were in connection with his federal campaign. These news reports, combined with information contained in Mr. Santos's disclosure reports, largely form the basis of this complaint.

⁵ See Devolder-Santos for Congress, Statement of Candidacy (April 17, 2021), <https://docquery.fec.gov/pdf/781/202104179443792781/202104179443792781.pdf>.

⁶ *Id.*

⁷ See Devolder-Santos for Congress, Statement of Organization (Nov. 5, 2021), <https://docquery.fec.gov/cgi-bin/forms/C00721365/1547349/>.

⁸ See Devolder-Santos for Congress, Receipts, https://www.fec.gov/data/receipts/?data_type=processed&committee_id=C00721365&contributor_name=George+Santos&two_year_transaction_period=2022; Devolder-Santos for Congress, 2022 Post-General Report at 82, <https://docquery.fec.gov/pdf/330/202212089548011330/202212089548011330.pdf>.

⁹ Michael Gold and Grace Ashford, *George Santos Admits to Lying About College and Work History*, New York Times, (Dec. 26, 2022), <https://www.nytimes.com/2022/12/26/nyregion/george-santos-interview.html>; see Grace Ashford and Michael Gold, *Who Is Rep.-Elect George Santos? His Resume May be Largely Fiction*, New York Times (Dec. 19, 2022), <https://www.nytimes.com/2022/12/19/nyregion/george-santos-ny-republicans.html>.

Loans to the Campaign

In statements to the press, Mr. Santos claimed that he funded these contributions using money he paid himself through his business, the Devolder Organization.¹⁰ In his personal financial disclosure report, Mr. Santos disclosed that he received \$750,000 in salary from the Devolder Organization in 2021 and 2022.¹¹ Despite Mr. Santos's claims, there are several reasons to doubt whether Mr. Santos's funded these massive contributions through income he earned at the Devolder Organization.

First, Mr. Santos reportedly formed the Devolder Organization as a limited liability company on May 11, 2021,¹² less than a month after he declared his federal candidacy. Second, on September 23, 2022, the company was administratively dissolved for failing to file an annual report before being reinstated on December 20, 2022, after allegations surfaced about Mr. Santos.¹³

Third, there is little to no information in the public domain about the company's existence and activities despite Mr. Santos's claims that he formed the company as a capital introduction consulting company that managed \$80 million in assets.¹⁴ For instance, the

¹⁰ See The Daily Beast, "George Santos' Massive Campaign Loans May Not Be Legal," December 28, 2022, <https://www.thedailybeast.com/george-santos-massive-campaign-loans-may-not-be-legal>.

¹¹ Clerk of the House of Representatives, George Anthony Devolder-Santos Financial Disclosure Report, Sept. 6, 2022, https://disclosures-clerk.house.gov/public_disc/financial-pdfs/2022/10050385.pdf [hereinafter the "George Santos Disclosure Report"].

¹² See Florida Division of Corporations, Devolder Organization LLC, <http://search.sunbiz.org/Inquiry/CorporationSearch/SearchResultDetail?inquirytype=EntityName&directionType=Initial&searchNameOrder=DEVOLDERORGANIZATION%20L210002061500&aggregateId=flal-121000206150-d2719327-f0cc-424e-8b6c-04026a110c67&searchTerm=DEVOLDER&listNameOrder=DEVOLDERLAWFIRM%20L160001128740>.

¹³ See The Hill, "Scrutiny turns to George Santos's campaign funding," Dec. 31, 2022, <https://thehill.com/homenews/house/3792626-scrutiny-turns-to-george-santos-campaign-funding/d>.

¹⁴ See Mother Jones, "George Santos Keeps Giving Inconsistent Stories About His Mystery Millions," Dec. 28, 2022, <https://www.motherjones.com/politics/2022/12/george-santos-devolder-mystery-millions-lies/>.

company had neither a public website nor a LinkedIn page.¹⁵ Notably, the financial data company Dun & Bradstreet reportedly estimated that the Devolder Organization only had revenue of \$43,688 as of July 30, 2022.¹⁶ According to news reports, the company had at least four clients, including the Tantillo Auto Group, two organizations led by billionaire John Ruiz in South Florida, and another firm associated with Long Island insurance magnate James C. Metzger.¹⁷ It is not clear what services Mr. Santos's performed for these clients.

Disclosure Reports

In addition to the questions regarding the origin of Mr. Santos's loans, the Campaign's disclosure reports include numerous questionable expenditures, indicating that the Campaign may have failed to accurately report expenditures and disbursements.

First, the campaign reported more than 800 disbursements in amounts under \$200.¹⁸ In addition, 37 of the disbursements totaled exactly \$199.99, as depicted in the chart below:¹⁹

Date	Recipient	Description	Amount
04/03/2021	Il Bacco Restaurante	Food/Beverage	\$199.99
04/23/2021	Il Bacco Restaurante	Food/Beverage	\$199.99
07/22/2021	Hyatt Orlando Hotel	Hotel Stay	\$199.99
08/13/2021	Delta Airlines	Airfare	\$199.99
08/22/2021	BJ's Wholesale	Office Supplies	\$199.99
09/19/2021	Il Bacco Restaurante	Food/Beverage	\$199.99

¹⁵ See New York Times, "Who Is Rep.-Elect George Santos? His Résumé May Be Largely Fiction.," December 19, 2022, https://www.nytimes.com/2022/12/19/nyregion/george-santos-ny-republicans.html?utm_source=Sailthru&utm_medium=email&utm_campaign=12/19/22%20Punchbowl%20News%20AM&utm_term=Punchbowl%20AM%20and%20Active%20Subscribers%20from%20Memberful%20Combined.

¹⁶ Michael Kranish, Azi Paybarah, and Hannah Knowles, Rep.-elect George Santos Acknowledges 'Resume Embellishment' but answers little on finances, Washington Post, (Dec. 26, 2022), <https://www.washingtonpost.com/politics/2022/12/26/george-santos-resume-wealth/>.

¹⁷ See The Daily Beast, "George Santos' Massive Campaign Loans May Not Be Legal," December 28, 2022, <https://www.thedailybeast.com/george-santos-massive-campaign-loans-may-not-be-legal>.

¹⁸ See Devolder-Santos for Congress, https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00721365&two_year_transaction_period=2022&max_amount=200

¹⁹ Devolder-Santos for Congress, Disbursements, https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00721365&two_year_transaction_period=2022&min_amount=199.99&max_amount=199.99

10/05/2021	Target Flushing	Office Supplies	\$199.99
10/06/2021	Il Bacco Restaurante	Food/Beverage	\$199.99
10/08/2021	Uber	Taxi Fare	\$199.99
10/13/2021	Miami Diner	Food/Beverage	\$199.99
10/13/2021	W Hotel South Beach	Hotel Stay	\$199.99
10/15/2021	Seaside Grill	Food/Beverage	\$199.99
10/17/2021	Uber	Taxi Fare	\$199.99
10/18/2021	Clear	Travel	\$199.99
10/18/2021	JFK Parking	Parking Fee	\$199.99
10/18/2021	Uber	Taxi Fare	\$199.99
10/18/2021	Walgreens	Office Supplies	\$199.99
10/24/2021	BJ's Wholesale	Office Supplies	\$199.99
10/30/2021	American Airlines	Airfare	\$199.99
11/01/2021	Delta Airlines	Airfare	\$199.99
11/07/2021	Uber	Taxi Fare	\$199.99
11/10/2021	Best Buy	Office Supplies	\$199.99
11/10/2021	Priceline	Travel Insurance	\$199.99
11/12/2021	Hyatt Corazon	Hotel Stay	\$199.99
11/14/2021	Best Buy	Office Supplies	\$199.99
11/16/2021	Amtrak	Transportation SVC	\$199.99
11/28/2021	Delta Airlines	Airfare	\$199.99
11/30/2021	Il Bacco Restaurante	Food/Beverage	\$199.99
11/30/2021	Il Bacco Restaurante	Food/Beverage	\$199.99
12/01/2021	Amtrak	Transportation SVC	\$199.99
12/09/2021	Walmart	Office Supplies	\$199.99
12/18/2021	Il Bacco Restaurante	Food/Beverage	\$199.99
12/18/2021	Uber	Taxi Fare	\$199.99
12/27/2021	Staples	Office Supplies	\$199.99
12/28/2021	Staples	Office Supplies	\$199.99
12/31/2021	Delta Airlines	Airfare	\$199.99
02/07/2022	Best Buy	Office Supplies	\$199.99

As the chart shows, the Committee disclosed exactly the same disbursement amount of \$199.99 to several companies for a wide-variety of services that included food and beverage, hotel stays, ride shares, trains, airfare, parking costs, and office supplies purchases.²⁰ These

²⁰ See The New York Times, "Santos, a Suburban House and \$11,000 in Campaign Payments for 'Rent'," Dec. 29, 2022, <https://www.nytimes.com/2022/12/29/nyregion/george-santos-campaign-finance.html>.

charges are highly suspect since the costs for many of these services are unlikely to be \$199.99. For example, a one-night stay at the W Hotel South Beach on October 13, 2023 costs \$899.99.²¹

Second, the Campaign disclosed making \$10,900 in disbursements over the course of four months to a cleaning company called Cleaner 123 for “apartment rental for staff” and “rent.”²² The Campaign’s report disclosed an address in Huntington, NY for the disbursements.²³ According to a news article, the address appears to be a home in Long Island and at least one neighbor claimed that Mr. Santos had been living in the home for months.²⁴ The article reported that two other neighbors “had seen Mr. Santos and his husband coming and going[.]”²⁵

LEGAL DISCUSSION

1. There is Reason to Believe that Mr. Santos’s Loans to his Campaign Violated the Act’s Source Prohibitions

The Act and Commission regulations place strict limits on the amounts and sources of campaign contributions. In general, Commission regulations permit a candidate to use personal funds to make unlimited contributions to that candidate’s campaign.²⁶ However, the Act and Commission regulations prohibit corporations from using their treasury funds to make contributions to candidates and candidates from knowingly accepting such contributions.²⁷ A limited liability company is treated as a corporation for purposes of the Act’s source restriction if it has elected to be treated as a corporation with the Internal Revenue Service.²⁸

²¹ W South Beach, October 13-October 14, 2023 reservation, <https://www.marriott.com/reservation/rateListMenu.mi?defaultTab=prepay>

²² Devolder-Santos for Congress, https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00721365&recipient_name=cleaner+123.

²³ See The New York Times, “Santos, a Suburban House and \$11,000 in Campaign Payments for ‘Rent’,” Dec. 29, 2022, <https://www.nytimes.com/2022/12/29/nyregion/george-santos-campaign-finance.html>.

²⁴ *Id.*

²⁵ *Id.*

²⁶ See 11 C.F.R. § 110.10; see also AO 1988-07 (Bakal); AO 1990-09 (Mueller).

²⁷ 52 U.S.C. § 30118; 11 C.F.R. § 114.2(b).

²⁸ 11 C.F.R. § 110.1(g)(3).

Further, the Act and Commission regulations prohibit any person, including corporations, from making contributions in the name of another to federal committees or allowing their names to be used to make such contributions.²⁹ Similarly, it is unlawful for a committee to knowingly accept a contribution made by one person in the name of another.³⁰

In statements to the press, Mr. Santos claimed that the money he used to loan his campaign over \$700,000 ““was the money I paid myself through the Devolder Organization.””³¹ Although a candidate may use personal funds to loan his campaign, there are serious questions regarding whether these funds constitute personal income earned from the Devolder Organization. As previously explained, Mr. Santos formed the Devolder Organization in May 2021, less than a month after filing his Statement of Candidacy. Around a month after Mr. Santos formed the company, disclosure reports reveal that he loaned his campaign \$80,000.³² That Mr. Santos had earned sufficient income from the Devolder Organization after a month of the company’s existence to loan his campaign \$80,000 defies credibility.

Further, recent reporting calls into question whether the Devolder Organization was a bona fide company or merely used as a “shell” to disguise the true sources of the large contributions Mr. Santos’s made to his campaign. Although Mr. Santos claims that the company did consulting services and managed \$80 million in assets, there is little trace of it or any work it performed in the public domain.³³ Furthermore, the information that does exist undercuts the

²⁹ 52 U.S.C. § 30122; 11 C.F.R. § 110.4(b)(1)(i), (ii);

³⁰ *Id.*

³¹ See The Daily Beast, “George Santos’ Massive Campaign Loans May Not Be Legal,” December 28, 2022, <https://www.thedailybeast.com/george-santos-massive-campaign-loans-may-not-be-legal>.

³² See Devolder-Santos for Congress,

https://www.fec.gov/data/receipts/?data_type=processed&committee_id=C00721365&contributor_name=George+Santos&two_year_transaction_period=2022. This record shows an \$80,000 loan from Mr. Santos on June 30, 2021.

³³ According to news reports, the company had at least four clients, including the Tantillo Auto Group, two organizations led by billionaire John Ruiz in South Florida, and another firm associated with Long Island insurance magnate James C. Metzger. The Daily Beast, “George Santos’ Massive Campaign Loans May Not Be Legal,”

conclusion that the company was actively doing work. To be sure, the State of Florida administratively dissolved the company on September 23, 2022, and it was just reinstated on December 20, 2022 after wide-spread reports that Mr. Santos fabricated aspects of his background and employment.³⁴ Moreover, despite Mr. Santos's claims that the company was worth millions, the Dun & Bradstreet reportedly estimated that the Devolder Organization only had revenue of \$43,688 as of July 30, 2022.³⁵ If true, it would be impossible for the company to have generated the funds necessary for Mr. Santos to make nearly three quarters of million dollars in loans to his campaign.

Under these circumstances, there is reason to question whether Mr. Santos had the resources to fund such large contributions to his campaign through his work for the Devolder Organization. If Mr. Santos funded these contributions to his Campaign using corporate resources, then such conduct would be a significant violation of federal campaign finance laws. It would be a similarly significant violation of federal campaign finance laws if the Devolder Organization was used as mere pass-through for the contributions, obscuring the true sources of the contributions. Given the lack of information regarding the Devolder Organization, the timeline of its formation, Mr. Santos's wide-spread falsehoods regarding his finances, employment history, and background, the Commission should immediately investigate to

December 28, 2022, <https://www.thedailybeast.com/george-santos-massive-campaign-loans-may-not-be-legal>. However, it is unclear what consulting services Devolder Organization provided to these individuals. Further, Mr. Santos did not identify any of these clients on his personal financial disclosure report as required by the Ethics in Government Act. See U.S. House of Representatives Committee on Ethics, Instruction Guide - Financial Disclosure Statements and Periodic Transaction Reports at 39 (2021), <https://ethics.house.gov/sites/ethics.house.gov/files/documents/FINAL%202021%20FD%20Instructions.pdf>; George Anthony Devolder-Santos Financial Disclosure Report, Sept. 6, 2022, https://disclosures-clerk.house.gov/public_disc/financial-pdfs/2022/10050385.pdf.

³⁴ See The Hill, "Scrutiny turns to George Santos's campaign funding," Dec. 31, 2022, <https://thehill.com/homenews/house/3792626-scrutiny-turns-to-george-santoss-campaign-funding/d>.

³⁵ Michael Kranish, Azi Paybarah, and Hannah Knowles, Rep.-elect George Santos Acknowledges 'Resume Embellishment' but answers little on finances, Washington Post, (Dec. 26, 2022), <https://www.washingtonpost.com/politics/2022/12/26/george-santos-resume-wealth/>.

determine whether Mr. Santos's contributions to his campaign were from permissible sources. Thus, the Commission should find reason to believe that Santos and the Campaign may have accepted, and the Devolder Organization may have made prohibited corporate contributions or contributions in the name of another.

2. There is Reason to Believe that Respondents Failed to Accurately Report Expenditures

The Act requires candidate committees to keep accurate records of each disbursement.³⁶ These records must include the amount of the disbursement, the date of the disbursement, the name and address of the payee, and the purpose of the disbursement.³⁷ For each disbursement that exceeds \$200, the committee must keep a receipt, invoice, or canceled check.³⁸ If a treasurer fails to receive a receipt, invoice, or canceled check for the disbursements exceeding \$200, they can demonstrate his or her best efforts to obtain the information by making at least one written effort per transaction to obtain a duplicate copy of the needed documentation.³⁹

The Campaign's disclosure reports contain hundreds of expenditures in amounts less than \$200. As the above chart demonstrates, almost 40 of these disbursements were in amounts that totaled exactly \$199.99 and covered a wide variety of services, including the same services across different providers. It is simply implausible that the Campaign could have incurred precisely \$199.99 in expenses for discrete disbursements on expenses for food and beverage, luxury hotel stays, ride shares, train tickets, parking costs, and office supplies purchases.⁴⁰ It is similarly implausible that the Campaign could have incurred airfare costs of \$199.99 on multiple dates and for different airline carriers. Rather, the sheer number of these irregular disbursements

³⁶ See FEC, Recording Disbursements, <https://www.fec.gov/help-candidates-and-committees/keeping-records/records-disbursements/>.

³⁷ *Id.*

³⁸ *Id.*

³⁹ *Id.*

⁴⁰ See The New York Times, "Santos, a Suburban House and \$11,000 in Campaign Payments for 'Rent'," Dec. 29, 2022, <https://www.nytimes.com/2022/12/29/nyregion/george-santos-campaign-finance.html>.

supports the conclusion that Respondents engaged in a coordinated plan to avoid their recordkeeping obligations under the Act, while also misleading the public about the true cost of these expenditures. Accordingly, the Commission should find reason to believe that Respondents violated the Act and Commission regulations by filing inaccurate disclosure reports.

3. There is Reason to Believe that Respondents Violated the Prohibition on Personal Use of Campaign Funds

The Act prohibits individuals, including candidates, from converting campaign funds to personal use.⁴¹ Campaign funds are converted to personal use when a person uses campaign funds “to fulfill any commitment, obligation, or expense . . . that would exist irrespective of the candidate’s election campaign or individual’s duties as a holder of Federal office.”⁴² The Act and Commission regulations include a list of expenses that are considered *per se* personal use when paid with campaign funds – meaning expenses that are never permissible. Among that list of prohibited expenses is “rent . . . for any part of any personal residence of the candidate or a member of the candidate’s family.”⁴³

Here, the facts strongly suggest that Mr. Santos used campaign funds to pay rent for a property that he and his husband used as their personal residence. As mentioned above, the Campaign reported the following five disbursements, totaling \$10,900, for various rent-related expenses:⁴⁴

Date	Recipient	Description	Amount
06/03/2022	Cleaner 123 Inc.	Apartment Rental for Staff	\$2,000.00
07/05/2022	Cleaner 123 Inc.	Rent & Rent Deposit	\$1,600.00
07/05/2022	Cleaner 123 Inc.	Rent	\$1,000.00
08/04/2022	Cleaner 123 Inc.	Apartment Rental for Staff	\$2,800.00

⁴¹ 52 U.S.C. § 30114(a)(6), (b)(1); see 11 C.F.R. § 113.2(g).

⁴² 52 U.S.C. § 30114(b)(2); see 11 C.F.R. § 113.1(g).

⁴³ 52 U.S.C. § 30114(b)(2)(A); see 11 C.F.R. § 113.1(g)(1)(i)(E).

⁴⁴ Devolder-Santos for Congress,

https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00721365&recipient_name=cleaner+123.

09/06/2022	Cleaner 123 Inc.	Apartment Rental for Staff	\$3,500.00
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Despite the Campaign's campaign finance reports indicating that three of the five rent-related disbursements were made for staff housing, reporting by the *New York Times* suggests that the Campaign's descriptions may not be true. According to the article, one neighbor stated, "Mr. Santos himself had been living there for months" and two others had seen Mr. Santos and his husband "coming and going."⁴⁵ If the reporting is accurate, Mr. Santos plainly violated the Act's strict prohibition on use of campaign funds to pay rent for a "personal residence of the candidate or a member of the candidate's family."⁴⁶ Accordingly, the Commission should find reason to believe that Respondents violated the Act and Commission regulations by converting campaign funds to personal use.

4. There is Reason to Believe that Respondents Failed to Timely file the Statement of Organization

Under the Act, an individual becomes a federal candidate when they receive contributions or makes expenditures in excess of \$5,000. Once an individual crosses the \$5,000 threshold, the candidate has 15 days to file a Statement of Candidacy designating a principal campaign committee.⁴⁷ The principal campaign committee must file a Statement of Organization within 10 days of its designation,⁴⁸ and is responsible for filing regular disclosure reports with the Commission.

⁴⁵ See The New York Times, "Santos, a Suburban House and \$11,000 in Campaign Payments for 'Rent'," December 29, 2022, <https://www.nytimes.com/2022/12/29/nyregion/george-santos-campaign-finance.html>.

⁴⁶ see 11 C.F.R. § 113.1(g)(1)(i)(E).

⁴⁷ 52 U.S.C. § 30101(2); 11 C.F.R. § 100.3(a)(1).

⁴⁸ 52 U.S.C. § 30103(a); 11 C.F.R. § 102.1 (a).

Here, Mr. Santos filed his Statement of Candidacy on April 17, 2021.⁴⁹ As such, the Campaign was required to file its Statement of Organization no later than April 27, 2021. However, the Campaign did not file this statement until November 5, 2021.⁵⁰ Accordingly, Respondents violated the Act by failing to timely file the required Statement of Organization within 10 days.

REQUESTED ACTION

Respondents' actions, if true, would amount to significant violations of federal campaign finance law, undermining the Act's transparency, and anti-corruption objectives. The Commission should devote the full use of its resources to ensure that the Act's interests are fully vindicated. We respectfully request that the Commission immediately investigate these allegations, fine Respondents the maximum amount permitted by law, and enjoin Respondents from further violations of the law.

Sincerely,



Tiffany Muller
End Citizens United
PO Box 66005
Washington, DC 20035

⁴⁹ See Devolder-Santos for Congress, Statement of Candidacy (April 17, 2021), <https://docquery.fec.gov/pdf/781/202104179443792781/202104179443792781.pdf>.

⁵⁰ See Devolder-Santos for Congress, Statement of Candidacy (April 17, 2021), <https://docquery.fec.gov/pdf/781/202104179443792781/202104179443792781.pdf>. See also Devolder-Santos for Congress, Statement of Organization (Nov. 5, 2021), available at <https://docquery.fec.gov/cgi-bin/forms/C00721365/1547349/>.

SUBSCRIBED AND SWORN to before me this 9th day of January 2023.

mark andrews

Notary Public

My Commission Expires:

MARK ANDREWS
NOTARY PUBLIC DISTRICT OF COLUMBIA
My Commission Expires July 14, 2024

