

**BEFORE THE FEDERAL ELECTION COMMISSION**

CAMPAIGN LEGAL CENTER  
1101 14th Street NW, Suite 400  
Washington, DC 20005  
(202) 736-2200

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

RONALD D. DESANTIS  
PO Box 3696  
Tallahassee, FL 32315

FRIENDS OF RON DESANTIS<sup>1</sup>  
and NANCY H. WATKINS in her  
official capacity as treasurer  
610 S. Boulevard  
Tampa, FL 33606

**COMPLAINT**

1. Florida Governor Ron DeSantis, a 2024 presidential candidate, and Friends of Ron DeSantis, his state PAC in Florida, have violated federal campaign finance laws by directing or transferring over \$80 million to Never Back Down, a federal super PAC that was reportedly organized to act as the primary outside spending vehicle backing DeSantis's 2024 presidential campaign, and has already spent over \$944,000 for that purpose.
2. For over twenty years, the Federal Election Campaign Act ("FECA") has prohibited federal candidates like DeSantis, along with their agents and entities they establish, finance, maintain, or control, from spending "soft money" — including, *e.g.*, money raised by nonfederal committees and organizations that are not subject to federal

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<sup>1</sup> On May 15, 2023, Friends of Ron DeSantis changed its name to "Empower Parents PAC," *see* Empower Parents PAC, Statement of Org. at 1 (May 15, 2023) (attached as Ex. A), but this complaint refers to the PAC using its name from January 5, 2018, through May 15, 2023, a period that encompasses the events at issue. Moreover, as explained herein, this name change appears to have been part of a broader effort to obscure the PAC's connection to DeSantis.

campaign finance laws — in connection with a federal election. The transfer of this colossal sum from a state PAC that DeSantis established and used to raise over \$225 million, to a federal committee that has spent, and plans to continue spending, millions of dollars supporting DeSantis’s own campaign is a brazen attempt to circumvent the federal campaign finance rules that are crucial to preventing corruption and establishing transparency about how our federal elections are financed.

3. This complaint is filed pursuant to 52 U.S.C. § 30109(a)(1) and is based on information and belief that DeSantis and Friends of Ron DeSantis have violated the Federal Election Campaign Act (“FECA”), 52 U.S.C. § 30101, *et seq.* If the Commission, “upon receiving a complaint . . . has reason to believe that a person has committed, or is about to commit, a violation of [FECA] . . . [t]he Commission *shall make an investigation* of such alleged violation.”<sup>2</sup>

## FACTUAL BACKGROUND

### **Ron DeSantis Became a Candidate for President by March 10, 2023.**

4. Ron DeSantis, the current governor of Florida, recently declared himself to be a 2024 presidential candidate.<sup>3</sup> DeSantis was first elected governor of Florida in 2018, and he won reelection in November 2022. He is barred, under Florida’s constitution, from seeking a third term as governor in 2026.<sup>4</sup>

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<sup>2</sup> 52 U.S.C. § 30109(a)(2) (emphasis added); *see also* 11 C.F.R. § 111.4(a).

<sup>3</sup> Ron DeSantis for President, Statement of Org. at 1 (May 24, 2023); *see* Nicholas Nehamas, *Ron DeSantis Joins 2024 Race, Hoping to Topple Trump*, N.Y. Times (May 24, 2023), <https://www.nytimes.com/2023/05/24/us/politics/ron-desantis-2024-presidential-election.html> (“[DeSantis] retains a host of strengths[, including] . . . a mountain of cash, a robust campaign operation, and a series of conservative policy victories in Florida after a landslide re-election triumph last fall.”).

<sup>4</sup> *See* Fla. Const. art. IV, § 5 (“No person who has, or but for resignation would have, served as governor or acting governor for more than six years in two consecutive terms shall be elected governor for the succeeding term.”).

5. While DeSantis filed a 2024 Statement of Candidacy with the Commission and designated a principal authorized campaign committee, Ron DeSantis for President, on May 24, 2023,<sup>5</sup> publicly available information indicates that DeSantis had, under FECA, already become a federal candidate before that point, as detailed below.
6. The available information indicates that DeSantis had decided to become a presidential candidate by March 10, 2023, and his actions throughout March and April 2023 show that he was no longer contemplating candidacy but had decided to run for president.
7. The *Washington Post* reported on March 10, 2023, that DeSantis “has indicated privately that he intends to run for president.”<sup>6</sup> Per the report, while “[a]llies do not expect him to announce a run until after the Florida state legislative session ends in May[,] . . . in recent conversations, DeSantis has described his presidential plans without any caveats that would suggest he’s still deciding.”<sup>7</sup>
8. DeSantis and his senior advisers were, by early April 2023, “already plotting out a strategy to run against Donald Trump for the long haul” in the 2024 Republican presidential nominating contests, and a “DeSantis political adviser said there have been internal conversations about delegate strategy.”<sup>8</sup>

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<sup>5</sup> Ron DeSantis, Statement of Candidacy (May 24, 2023), <https://docquery.fec.gov/pdf/806/202305249581677806/202305249581677806.pdf>; Ron DeSantis for President, Statement of Org. (May 24, 2023), <https://docquery.fec.gov/pdf/802/202305249581677802/202305249581677802.pdf>.

<sup>6</sup> Hannah Knowles & Isaac Stanley-Becker, *DeSantis indicates privately he intends to run in 2024 as allies prepare*, Wash. Post (updated Mar. 10, 2023), <https://www.washingtonpost.com/politics/2023/03/09/ron-desantis-2024-president-iowa-nevada/>.

<sup>7</sup> *Id.*

<sup>8</sup> Henry J. Gomez & Matt Dixon, *Ron DeSantis’ long-haul strategy against Trump comes into view*, NBC News (Apr. 6, 2023), <https://www.nbcnews.com/politics/2024-election/ron-desantis-long-haul-strategy-trump-comes-view-rcna78141> (“Florida Gov. Ron DeSantis’s team is already plotting out a strategy to run against Donald Trump for the long haul. The plan focuses less on making a quick splash in places like Iowa or New Hampshire and more on outlasting the former president in a battle for Republican convention delegates. Even though it’s early and DeSantis isn’t officially a candidate yet, in talks behind the scenes, an expanded map is viewed as one of the keys to victory, three sources close to the governor said. . . . Another DeSantis political adviser said there have been internal conversations about delegate strategy. Staffers expected to lead the effort include Ryan Tyson, a longtime Florida

9. In mid-April 2023, DeSantis began “quietly assembling a senior staff for an expected 2024 presidential campaign” and, indeed, “some of the senior staff have started to move in recent weeks to the campaign’s base in Tallahassee . . . as DeSantis prepares to announce his presidential ambitions.”<sup>9</sup>
10. Prior to this, DeSantis engaged in an extended period of fundraising, as well as domestic and foreign travel, to build a presidential war chest and publicly present himself as a viable presidential candidate.
11. For over a year, beginning during DeSantis’s 2022 gubernatorial reelection campaign and extending through May 5, 2023, when he took steps to distance himself from his state PAC, DeSantis actively raised money through Friends of Ron DeSantis, in amounts unprecedented for a gubernatorial reelection campaign. Numerous observers viewed this extraordinary fundraising — clearly unnecessary for DeSantis to secure reelection in the run-up to the 2020 general, and then blatantly unnecessary after he had already won, particularly since he cannot seek a third term as governor under Florida law — as intended for a future presidential candidacy:
  - a. As early as April 2022, DeSantis had already raised over \$100 million and broken the fundraising record for a non-self-funded gubernatorial candidate,<sup>10</sup>

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GOP pollster who played a crucial role in DeSantis’ 19-point re-election victory last year, and Jeff Roe, a longtime Republican operative who led Sen. Ted Cruz’s 2016 presidential campaign and is now advising the pro-DeSantis super PAC Never Back Down.”).

<sup>9</sup> Hugo Lowell, *DeSantis assembles senior staff for expected 2024 presidential campaign*, The Guardian (Apr. 27, 2023), <https://www.theguardian.com/us-news/2023/apr/27/ron-desantis-2024-presidential-campaign-staff> (“The senior staff roster effectively outlines a leadership team of around eight people as DeSantis looks to finalize his campaign operation ahead of a 2024 announcement that could come as early as the first two weeks of May or as late as July, one of the people said. . . . The campaign’s ambition is to reach a headcount of around 80 people by the time DeSantis announces.”).

<sup>10</sup> Steve Contorno, *DeSantis tops \$100 million for Florida reelection race – and sends signal to 2024 Republican field*, CNN (Apr. 8, 2022), <https://www.cnn.com/2022/04/08/politics/ron-desantis-florida-governor-reelection-fundraising/index.html>.

while at the same time spending relatively little of that sum to advance his gubernatorial reelection campaign.<sup>11</sup>

- b. Shortly before Florida’s 2022 gubernatorial primary election, an August 2022 report noted that DeSantis, who was “running unopposed in Tuesday’s primary as he goes for a second term, has amassed \$142 million from the start of 2021 through Aug. 5 [of] this year from donors including the hedge fund billionaires Ken Griffin and Paul Tudor Jones.”<sup>12</sup>
- c. By the November 2022 general election, in which DeSantis was easily reelected by nearly twenty points,<sup>13</sup> he had spent around \$100 million on his reelection and still had over \$90 million on hand.<sup>14</sup>
- d. By February 2023, DeSantis was actively raising money for an undeclared presidential candidacy: he hosted “an event for top donors and social-media influencers” that he reportedly had been courting to support and finance his 2024 presidential campaign. News reports at the time indicated that “[a]bout

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<sup>11</sup> See Steve Contorno, *Ron DeSantis has raised more than \$100 million for his reelection bid. Could he use that money in a presidential race?*, CNN (July 5, 2022), <https://www.cnn.com/2022/07/05/politics/ron-desantis-campaign-finance-2024-election/index.html> (“At the end of May, DeSantis was sitting on \$111 million — more money than any candidate has ever needed to win an election in the Sunshine State. More donations come in almost every day. . . . DeSantis has spent \$7 million this year between his campaign and political committee.”).

<sup>12</sup> Bill Allison & Mark Niquitte, *DeSantis Taps Donors Griffin, Tudor Jones in \$142 Million Haul*, Bloomberg (Aug. 22, 2022), <https://www.bloomberg.com/news/articles/2022-08-22/desantis-taps-donors-griffin-tudor-jones-in-142-million-haul#xj4y7vzkg>; see Matt Dixon, *DeSantis draws huge cash haul from Trump donors*, Politico (June 19, 2022), <https://www.politico.com/news/2022/06/19/desantis-cash-trump-donors-00040659> (“A DeSantis-aligned political committee, Friends of Ron DeSantis, has received \$3.4 million this election cycle from 10 donors who collectively spent \$24 million on Trump’s reelection bid. Most of the high-dollar donors had never given contributions in state-level Florida elections. . . . DeSantis has already raised more than \$100 million — a record setting pace for a single election cycle in Florida — and is an overwhelming favorite to win reelection this year, a victory that could leave him with a huge war chest as the 2024 election cycle begins.”).

<sup>13</sup> 2022 Elections – Florida Election Results, Politico (last updated Feb. 2, 2023), <https://www.politico.com/2022-election/results/florida/statewide-offices/>.

<sup>14</sup> Matt Dixon, *‘De facto frontrunner’: DeSantis’ \$200 million haul positions him for 2024 run*, Politico (Nov. 3, 2022), <https://www.politico.com/news/2022/11/03/desantis-record-breaking-haul-positions-him-for-2024-00065046> (“DeSantis has more than \$90 million remaining in the bank after spending about \$100 million total this election cycle on his reelection bid via his aligned committee and campaign.”).

150 guests are expected to attend the three-day event at the Four Seasons resort in Palm Beach, Florida, including wealthy Republican donors and conservative social-media influencers whom DeSantis’s camp has courted in recent months ahead of a widely expected presidential run.”<sup>15</sup>

12. DeSantis has traveled extensively around the country for months, reportedly under the guise of promoting a recent book, while effectively promoting himself as a viable candidate for the presidency, including visiting states with early presidential nominating contests like Iowa, New Hampshire, and Nevada:

- a. Over President’s Day weekend (February 18-20, 2023), DeSantis visited New York, Philadelphia, and Chicago in events designed to “appeal[ ] to embattled police officers and crime-concerned citizens” by “pledging more support for law enforcement and vowing to battle liberal-minded criminal justice reforms.”<sup>16</sup> These events were coupled with an influx of fundraising, with “seven-figure checks arriv[ing] ahead of what has amounted to a late-February soft launch of DeSantis’ highly anticipated run for president.”<sup>17</sup>

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<sup>15</sup> James Oliphant, *DeSantis to host donors ahead of likely 2024 White House bid*, Reuters (Feb. 23, 2023), <https://www.reuters.com/world/us/desantis-host-donors-ahead-likely-2024-white-house-bid-2023-02-23/>.

<sup>16</sup> Jonathan Weisman & Emma G. Fitzsimmons, *DeSantis Visits 3 States on Tour Meant to Show He Is Tough on Crime*, N.Y. Times (Feb. 20, 2023), <https://www.nytimes.com/2023/02/20/nyregion/desantis-visit-nyc-philadelphia-chicago.html>.

<sup>17</sup> Steve Contoro, *DeSantis gets 7-figure checks from top GOP donors as he soft launches presidential campaign*, CNN (updated Feb. 22, 2023), <https://www.cnn.com/2023/02/22/politics/ron-desantis-donors/index.html>. (“The seven-figure checks arrived ahead of what has amounted to a late-February soft launch of DeSantis’ highly anticipated run for president. On Monday, DeSantis held campaign-style rallies with police officers in New York, Philadelphia and Chicago, where he regaled the crowds with stories of the culture wars. . . . The continued financial support from wealthy donors — achieved without actually declaring himself a candidate — explains, in part, why DeSantis is content to remain on the sidelines.”).

- b. On March 3 and 4, 2023, DeSantis spoke at events in Houston and Dallas, Texas,<sup>18</sup> including at the “Dallas County Republican Party’s Reagan Day Dinner,” where attendees noted that his remarks “resembled a campaign stump speech” that served as “an effective list of his state-level accomplishments.”<sup>19</sup> Also in early March, DeSantis appeared at events in Nevada and California; at the latter, he delivered a “campaign stump speech” detailing his public policy stances.<sup>20</sup>
- c. DeSantis visited Iowa on March 10, 2023 — not long after presidential candidates or potential candidates Nikki Haley and Tim Scott visited the state — and held an event co-hosted by Iowa’s governor, to “begin courting Iowa’s Republican caucus voters in person.”<sup>21</sup>
- d. DeSantis later made additional visits to Iowa, New Hampshire, and South Carolina<sup>22</sup> — *i.e.*, the states that presidential candidates routinely visit early in

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<sup>18</sup> See Patrick Svitek, *Ron DeSantis proclaims Texas, Florida partners against “woke” left in Houston speech*, Texas Tribune (Mar. 4, 2023), <https://www.texastribune.org/2023/03/04/ron-desantis-houston-speech-woke/> (“DeSantis’ remarks at the annual Harris County Lincoln Reagan Dinner were part of a two-day swing through Texas that included a similar event Saturday for the Dallas County GOP. The events come as DeSantis increasingly travels outside Florida in advance of an anticipated bid against former President Donald Trump for the Republican presidential nomination.”)

<sup>19</sup> Knowles & Stanley-Becker, *supra*.

<sup>20</sup> Jenavieve Hatch, *Florida Gov. Ron DeSantis brings the war on ‘woke mind virus’ ideology to California*, Sacramento Bee (Mar. 6, 2023), <https://www.sacbee.com/news/politics-government/capitol-alert/article272774740.html> (“The 45-minute talk checked all the boxes for a campaign stump speech: his resistance to COVID-19 lockdowns and vaccines, a hard line against school curricula that address race, gender, sexual orientation, and aggressive steps to check illegal immigration.”); see *Florida Gov. Ron DeSantis to be featured as guest speaker at Las Vegas event*, KTNV ABC News (Mar. 8, 2023), <https://www.ktnv.com/news/florida-gov-ron-desantis-to-be-featured-as-guest-speaker-at-las-vegas-event>.

<sup>21</sup> Steve Contorno, Jeff Zeleny & Kit Maher, *DeSantis moves his presidential ambitions into the open with Iowa visit*, CNN (Mar. 10, 2023), <https://www.cnn.com/2023/03/10/politics/ron-desantis-iowa-president-republican-primary/index.html>.

<sup>22</sup> See Paul Steinhauser, *Gov. Ron Desantis addresses potential 2024 presidential run: ‘You either gotta put up or shut up,’* Fox News (May 8, 2023), <https://www.fox13news.com/news/gov-ron-desantis-addresses-potential-2024-presidential-run-you-either-gotta-put-up-or-shut-up> (“[Over] the past two months, [DeSantis has] made campaign-style stops in Iowa, New Hampshire and South Carolina, the first three states to vote in the GOP presidential nominating calendar. DeSantis returns to Iowa next weekend.”).

each presidential election cycle because they hold early presidential nominating contests — as well as states crucial to securing electoral college votes in a general election, like Ohio and Virginia.<sup>23</sup>

13. After his domestic proto-campaign tour, beginning on April 25, 2023, DeSantis traveled overseas, visiting Japan, South Korea, Israel and the United Kingdom, ostensibly to promote international trade, but with a clear goal of promoting his viability as a presidential candidate by “bolster[ing] his foreign policy credentials.”<sup>24</sup> As observers have noted, “[s]uch tours are a rite of passage for presidential candidates,” particularly for candidates that have a perceived “foreign policy experience deficit.”<sup>25</sup>
14. DeSantis has raised and spent far more than \$5,000 to advance his 2024 presidential candidacy. DeSantis’s fundraising, as well as the vast amount spent to support DeSantis’s travel to de facto presidential campaign events, plainly exceeded \$5,000. Reports indicate that DeSantis’s travel and related expenses have been paid for by “independent” groups,

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<sup>23</sup> Nick Robertson, *Protesters interrupt DeSantis speech at New Hampshire fundraising event*, The Hill (Apr. 15, 2023), <https://thehill.com/homenews/state-watch/3952109-protesters-interrupt-desantis-speech-at-new-hampshire-fundraising-event/> (“DeSantis was headlining the Amos Tuck Dinner, a key fundraising event for the New Hampshire Republican Party. The governor has recently traveled to a number of states in the leadup to a likely presidential campaign announcement. Thursday he attended a GOP fundraiser in Ohio and earlier Friday addressed Liberty University in Virginia.”).

<sup>24</sup> David Jackson, *‘A heck of an ally’: DeSantis begins world tour by praising Japan, bristling at Trump rivalry*, USA Today (Apr. 24, 2023), <https://www.usatoday.com/story/news/politics/2023/04/24/ron-desantis-2024-presidential-contender-japan/11727835002/> (“Florida Gov. Ron DeSantis kicked off a four-nation tour meant to bolster his foreign policy credentials by touting the role of Japan in a ‘tough neighborhood’ and dismissing questions about his rivalry with former President Donald Trump.”); see Hannah Knowles, *Politics stops at the water’s edge? Not for DeSantis on trip abroad*, Wash. Post (Apr. 25, 2023), <https://www.washingtonpost.com/politics/2023/04/25/desantis-international-trip-2024/>. (“For close watchers of DeSantis, it was a familiar talking point as he makes moves toward entering the Republican presidential race against Donald Trump and others — and one that reinforced the domestic political overtones of his international trip this week. Japan was DeSantis’s first stop on an “international trade mission” for Florida that gives the governor a chance to boost his foreign policy credentials heading into a presidential contest.”).

<sup>25</sup> Julian Borger, *Ron DeSantis to meet UK ministers on tour to boost foreign policy credentials*, The Guardian (Apr. 27, 2023), <https://www.theguardian.com/us-news/2023/apr/27/ron-desantis-to-stop-off-in-uk-on-friday-on-tour-to-boost-foreign-policy-credentials> (“Ron DeSantis is due to spend Friday in Britain on the last leg of a world tour aimed at enhancing his foreign policy credentials before an expected run for the Republican nomination. . . . the timing of DeSantis’s tour, which has also included Japan, South Korea and Israel, has been dictated by the brewing primary contest with Donald Trump.”).



including private jets paid for by “rich allies” as well as And To The Republic, “a Michigan-based nonprofit . . . [that] formed in late January as Mr. DeSantis was beginning to test the national waters and quickly became a critical part of his warm-up campaign. It organized nearly a dozen speaking events featuring the governor in at least eight states.”<sup>26</sup>

15. Indeed, even after DeSantis had clearly decided to run for president, his state committee, Friends of Ron DeSantis, continued raising millions of dollars, taking in over \$3.8 million in the two-month period between March 1, 2023, and April 30, 2023.<sup>27</sup> This continued, extraordinary fundraising, *following* DeSantis’s sweeping reelection victory in November 2022, is particularly notable in light of DeSantis’s inability, under the Florida constitution, to seek a third term as governor.<sup>28</sup>

**DeSantis Transfers Soft Money From His State PAC to a Federal Super PAC  
Formed to Support His Presidential Run**

16. Friends of Ron DeSantis is a state PAC that registered in Florida on January 5, 2018.<sup>29</sup> Nancy H. Watkins has been the committee’s treasurer since its formation.<sup>30</sup> On its original statement of organization, Friends of Ron DeSantis listed DeSantis under “candidate or other individual that this committee is supporting.”<sup>31</sup>

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<sup>26</sup> Alexandra Berzon and Rebecca Davis O’Brien, *Air DeSantis: The Private Jets and Secret Donors Flying Him Around*, N.Y. Times (May 20, 2023), <https://www.nytimes.com/2023/05/20/us/politics/desantis-private-jets-donors.html> (“Ahead of an expected White House bid, Mr. DeSantis has relied heavily on his rich allies to ferry him around the country to test his message and raise his profile. Many of these donors are familiar boosters from Florida, some with business interests before the state, according to a New York Times review of Mr. DeSantis’s travel. Others have been shielded from the public by a new nonprofit.”).

<sup>27</sup> Friends of Ron DeSantis Campaign Finance Activity, Florida Sec’y of State, Div. of Elections, <https://dos.elections.myflorida.com/cgi-bin/TreSel.exe> (viewed May 24, 2023) (attached as Ex. I).

<sup>28</sup> *Supra* note 4.

<sup>29</sup> Friends of Ron DeSantis, Statement of Org. of Political Comm. (Jan. 5, 2018) (attached as Ex. B).

<sup>30</sup> Friends of Ron DeSantis, Appointment of Campaign Treasurer (Aug. 22, 2018) (attached as Ex. C).

<sup>31</sup> Friends of Ron DeSantis, Statement of Org. of Political Comm. (Jan. 5, 2018) (attached as Ex. B).

17. On January 5, 2018, the same day that the Friends of Ron DeSantis registered in Florida, DeSantis filed a “Statement of Solicitation” with respect to Friends of Ron DeSantis that provided, under “Relationship Between Office Holder or Candidate and Organization” — “Established/Maintain.”<sup>32</sup>
18. DeSantis withdrew his statement of solicitation authorizing Friends of Ron DeSantis to raise funds on his behalf on May 5, 2023 — *i.e.*, just 19 days before publicly announcing his presidential campaign, and after over five years of authorizing the state PAC to raise money on his behalf, during which time it raised over \$225 million for him.<sup>33</sup>
19. Three days later, on May 8, 2023 — after DeSantis had already been a presidential candidate for several weeks — Blaise Ingoglia, a Florida state legislator, was named Friends of Ron DeSantis’s chairperson and filed a statement of solicitation authorizing Friends of Ron DeSantis to raise funds on his behalf.<sup>34</sup> Ingoglia’s statement provides, under “Relationship Between Office Holder or Candidate and Organization” — “Maintain/Control.”<sup>35</sup>

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<sup>32</sup> Statement of Solicitation, Ron DeSantis (Jan. 5, 2018) (attached as Ex. D). The instructions at the bottom of this form specify: “The Governor, Lieutenant Governor, members of the Cabinet, state legislators, or candidates for such offices who directly or indirectly solicit, cause to be solicited, or accept any contribution on behalf of an organization that is exempt from taxation under s. 527 or s. 501 (c)(4) of the Internal Revenue Code, *which such individuals, in whole or in part, establish, maintain, or control*, must file Form DS-DE 102.” *Id.* (emphasis added).

<sup>33</sup> Letter from Gov. Ron DeSantis to Bureau of Election Records, Florida Sec’y of State (May 5, 2023) (enclosing January 2018 statement of solicitation) (attached as Ex. E) (“I am no longer associated with the political committee and do not directly or indirectly solicit, cause to be solicited, or accept any contributions on its behalf.”).

<sup>34</sup> Statement of Solicitation, Blaise Ingoglia (May 8, 2023) (attached as Ex. F).

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

20. On May 15, 2023, the week before DeSantis filed his Statement of Candidacy and publicly announced that he was running for President on Twitter,<sup>36</sup> Friends of Ron DeSantis officially changed its name to “Empower Parents PAC.”<sup>37</sup>
21. At least until April 15, 2023, the home page of Friends of Ron DeSantis’s official website listed DeSantis as its “Associated Person.”<sup>38</sup> The same webpage, <https://friendsofrondesantis.com>, now redirects to <https://empowerparentspac.com>, the page for “Empower Parents PAC,” which is the new name for the PAC formerly known as Friends of Ron DeSantis.<sup>39</sup> The page now lists Ingoglia as its “Associated Person.”<sup>40</sup>
22. Overall, Friends of Ron DeSantis has reported raising over \$225 million, of which it has spent just over \$140 million, leaving it with an approximate cash-on-hand balance of over \$85 million as of May 24, 2023.<sup>41</sup>
23. Never Back Down Inc. (“Never PAC”) is a federal independent-expenditure only political committee (“IEOPC”) — commonly referred to as a “super PAC” — that registered with the Commission on February 23, 2023. Its treasurer is Cabell Hobbs.<sup>42</sup> As

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<sup>36</sup> Ron DeSantis, Statement of Candidacy (May 24, 2023); Steve Contorno, Kit Maher, Gregory Krieg and David Wright, *Florida Gov. Ron DeSantis launches 2024 presidential bid on Twitter with Elon Musk*, CNN (May 25, 2023), <https://www.cnn.com/2023/05/24/politics/ron-desantis-fec-filing-2024/index.html>.

<sup>37</sup> Empower Parents PAC, Statement of Org. at 1 (May 15, 2023) (attached as Ex. A).

<sup>38</sup> Friends of Ron DeSantis, <https://friendsofrondesantis.com/> (screenshot from Apr. 15, 2023) (attached as Ex. G); see Wayback Machine, Archive of <https://friendsofrondesantis.com/> (Apr. 15, 2023) <https://web.archive.org/web/20230415205010/https://friendsofrondesantis.com/> (viewed May 26, 2023).

<sup>39</sup> Empower Parents PAC, <https://empowerparentspac.com> (viewed May 23, 2023) (attached as Ex. H); see Gary Fineout and Sally Goldenberg, *DeSantis takes major step ahead of expected presidential bid*, Politico (May 9, 2023), <https://www.politico.com/news/2023/05/09/desantis-2024-campaign-political-committee-00095947> (“The website for [Friends of Ron DeSantis] was changed on Tuesday morning to say . . . that the committee is associated with state Sen. Blaise Ingoglia and not DeSantis. The committee on Tuesday also filed paperwork that said Ingoglia replaced a Tampa accountant as the official chair of the organization.”).

<sup>40</sup> Empower Parents PAC, <https://empowerparentspac.com> (viewed May 23, 2023) (attached as Ex. H); see Fineout and Sally, *supra* note 39.

<sup>41</sup> Friends of Ron DeSantis Campaign Finance Activity, Florida Sec’y of State, Div. of Elections, <https://dos.elections.myflorida.com/cgi-bin/TreSel.exe> (viewed May 24, 2023) (attached as Ex. I).

<sup>42</sup> Never Back Down, Inc., Statement of Org. at 1 (Feb. 23, 2023).

of May 24, 2023, Never PAC has reported spending over \$944,000 on independent expenditures supporting DeSantis’s 2024 presidential candidacy.<sup>43</sup>

24. Reports indicate that on or after May 1, 2023<sup>44</sup> — *i.e.*, after DeSantis had already decided to run for president, and raised or spent more than \$5,000 toward that end — Friends of Ron DeSantis has contributed, or will soon contribute, over \$80 million to Never PAC:

a. On May 24, 2023, the same day that DeSantis finally acknowledged his candidacy, Never PAC confirmed that it has received or will soon receive \$80 million from Friends of Ron DeSantis, and that the super PAC had factored that major contribution — comprising 40% of its budget — into their plans: *The New York Times* reported that “[t]op officials with the pro-DeSantis group, a super PAC called Never Back Down, provided their most detailed account yet of their battle plan to aid Mr. DeSantis” and that “[t]he group said it expected to have an overall budget of at least \$200 million, including more than \$80 million to be transferred from an old DeSantis state political account.”<sup>45</sup>

b. Indeed, for weeks before DeSantis’s candidacy announcement, Never PAC officials had reportedly been “telling donors they intend to push the bounds”

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<sup>43</sup> Independent Expenditures, Never Back Down Inc., [https://www.fec.gov/data/independent-expenditures/?data\\_type=processed&most\\_recent=true&q\\_spender=C00834077&is\\_notice=true](https://www.fec.gov/data/independent-expenditures/?data_type=processed&most_recent=true&q_spender=C00834077&is_notice=true) (viewed May 24, 2023).

<sup>44</sup> State campaign finance reports filed by Friends of Ron DeSantis indicate that it had not yet directed or transferred the money as of April 30, 2023. *See* Friends of Ron DeSantis Campaign Finance Activity, *supra* (attached as Ex. I).

<sup>45</sup> Shane Goldmacher, Jonathan Swan & Maggie Haberman, *DeSantis Allies’ \$200 Million Plan for Beating Trump*, N.Y. Times (May 24, 2023); *see* Ben Kamisar, *Ron DeSantis raked in big money for his re-election. Here’s how he can use it in 2024*, NBC News (May 24, 2023) (“The governor’s state political committee, Friends of Ron DeSantis, had at least \$86 million in the bank at the end of April. . . . DeSantis’s political operation will direct that money to his supportive super PAC thanks to a gray area of federal campaign finance law. It’s a huge boon for DeSantis, whose Never Back Down super PAC has plans to raise and spend about \$200 million and finance a huge ground game.”).

of super PAC support, laying out plans to raise and spend “about \$200 million” to support DeSantis’s presidential campaign, including “the more than \$85 million that DeSantis has in a state fundraising account,” *i.e.*, Friends of Ron DeSantis.<sup>46</sup>

25. Never PAC has been using and/or reportedly intends to use this soft money in connection with a federal election by making over \$944,000 in independent expenditures supporting DeSantis.<sup>47</sup>

#### SUMMARY OF THE LAW

26. Under FECA, a “candidate” is defined as “an individual who seeks nomination for election, or election, to Federal office” and crosses the statutory threshold of receiving aggregate contributions, or making aggregate expenditures, in excess of \$5,000.<sup>48</sup>
27. Federal candidates must file a written statement designating a principal campaign committee within fifteen days of becoming a candidate.<sup>49</sup>
28. FECA requires that the funds federal candidates and 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 officeholders, their agents, and any entities that they directly or indirectly establish, finance, maintain or control from raising or spending funds in connection with

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<sup>46</sup> Michael Scherer, Isaac Stanley-Becker and Ashley Parker, *DeSantis group plans field program, showing the expanding role of super PACs*, Wash. Post (Apr. 19, 2023), <https://www.washingtonpost.com/politics/2023/04/19/desantis-super-pac-campaign/>.

<sup>47</sup> Independent Expenditures, Never Back Down Inc., [https://www.fec.gov/data/independent-expenditures/?data\\_type=processed&most\\_recent=true&q\\_spender=C00834077&is\\_notice=true](https://www.fec.gov/data/independent-expenditures/?data_type=processed&most_recent=true&q_spender=C00834077&is_notice=true) (viewed May 24, 2023).

<sup>48</sup> 52 U.S.C. § 30101(2); *see* 11 C.F.R. § 100.3.

<sup>49</sup> 52 U.S.C. § 30102(e)(1); *see* 11 C.F.R. § 101.1(a).

a federal election outside of FECA’s contribution limits, source prohibitions, and reporting requirements — *i.e.*, so-called “soft money.”<sup>50</sup>

29. Specifically, FECA provides, in relevant part:

A candidate, individual holding Federal office, agent of a candidate or 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 candidates or individuals holding Federal office, shall not — (A) solicit, receive, direct, transfer, or spend funds in connection with an election for Federal office, including funds for any Federal election activity, unless the funds are subject to the limitations, prohibitions, and reporting requirements of this Act.<sup>51</sup>

30. As such, FECA prohibits federal candidates and officeholders, their agents, and any entities that they directly or indirectly establish, finance, maintain or control — entities including nonfederal committees not subject to FECA — from soliciting, receiving, directing, or transferring funds in connection with a federal election that are not subject to federal campaign finance laws.

31. Although federal court decisions have invalidated some of FECA’s source prohibitions and amount limitations, as applied to IEOPCs,<sup>52</sup> those decisions left intact BCRA’s statutory amendments mandating that federal candidates and officeholders cannot “solicit, receive, direct, transfer, or spend” soft money in connection with federal elections, and those requirements thus remain in effect, as the Commission itself has clearly recognized.

32. In Advisory Opinion 2011-12 (Majority PAC), the Commission explicitly reaffirmed that BCRA, codified at 52 U.S.C. § 30125 *et seq.*, “remains valid” after *Citizens United* and

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<sup>50</sup> See generally 52 U.S.C. § 30125; 11 C.F.R. part 300.

<sup>51</sup> 52 U.S.C. § 30125(e)(1); see 11 C.F.R. § 300.61.

<sup>52</sup> *SpeechNow v. FEC*, 599 F.3d 686, 689 (D.C. Cir. 2010); see also *Citizens United v. FEC*, 558 U.S. 310 (2010).

*SpeechNow*: “[BCRA] was enacted by Congress long after [FECA’s] contribution limits and source prohibitions. It was upheld by the Supreme Court in *McConnell v. FEC*, 540 U.S. 93, 181-184 (2003), and remains valid since it was not disturbed by either *Citizens United* or *SpeechNow*.”<sup>53</sup> In that advisory opinion, the Commission stated that federal candidates cannot lawfully solicit funds on an IEOPC’s behalf that are beyond FECA’s contribution limits, source prohibitions, and reporting requirements.<sup>54</sup>

33. Accordingly, even after *Citizens United* and *SpeechNow*, FECA clearly prohibits federal candidates and officeholders, their agents, and any other entities that they directly or indirectly establish, finance, maintain or control, from directing or transferring contributions raised outside FECA’s contribution limits and source prohibitions, and/or aggregating more than \$5,000 per year, to an IEOPC.<sup>55</sup>

#### CAUSE OF ACTION

##### COUNT I:

##### **DESANTIS AND FRIENDS OF RON DESANTIS VIOLATED 52 U.S.C. § 30125(E)(1)(A) BY DIRECTING OR TRANSFERRING OVER \$80 MILLION TO NEVER PAC**

34. The available information supports finding reason to believe that DeSantis, a federal candidate, and Friends of Ron DeSantis, a state PAC registered in Florida that DeSantis “directly or indirectly established, financed, maintained or controlled” during his federal candidacy, violated FECA by directing or transferring over \$80 million, either directly or through an agent, from Friends of Ron DeSantis to Never PAC, a federal IEOPC, in connection with a federal election.

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<sup>53</sup> Advisory Op. 2011-12 (Majority PAC) at 4.

<sup>54</sup> *Id.* at 3-4.

<sup>55</sup> See 52 U.S.C. §§ 30116(a)(1)(C) (providing a \$5,000 per year contribution limit for non-connected political committees), 30125(e)(1)(A).

35. There is ample information indicating that DeSantis had decided to run for president, and raised or spent well in excess of the \$5,000 threshold amount to qualify as a “candidate” under FECA, well before the soft money transfer and his public announcement of his candidacy on May 24, 2023.
36. Available evidence strongly indicates that DeSantis had decided to run for president at least by March 10, 2023, when the *Washington Post* reported that DeSantis “has indicated privately that he intends to run for president” and while “[a]llies do not expect him to announce a run until after the Florida state legislative session ends in May[,] . . . in recent conversations, DeSantis has described his presidential plans without any caveats that would suggest he’s still deciding.”<sup>56</sup> These statements, attributed to those in DeSantis’s inner circle, support the conclusion that by March 10, 2023 — weeks before any public acknowledgement that he was running and the transfer of soft money to Never PAC — DeSantis was no longer weighing or deliberating whether to run for president, but had instead decided to run. Indeed, this report and others cited the end of Florida’s state legislative session in May 2023 as a marker for when DeSantis would *announce* the decision he had already made.<sup>57</sup>
37. DeSantis took additional actions, in April 2023, that support the conclusion he had decided to run for president: DeSantis and his senior advisers were, by early April 2023, “already plotting out a strategy to run against Donald Trump for the long haul” in the 2024 Republican presidential nominating contests, and a “DeSantis political adviser said there have been internal conversations about delegate strategy.”<sup>58</sup> Likewise, in mid-April

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<sup>56</sup> Knowles & Stanley-Becker, *supra* note 6.

<sup>57</sup> *Id.*

<sup>58</sup> Gomez & Dixon, *supra* note 8.



2023, DeSantis began “quietly assembling a senior staff for an expected 2024 presidential campaign” and, indeed, “some of the senior staff have started to move in recent weeks to the campaign’s base in Tallahassee . . . as DeSantis prepares to announce his presidential ambitions.”<sup>59</sup>

38. These tangible steps — outlining campaign strategy, building a campaign staff, and developing a campaign infrastructure — are generally inconsistent with someone still deciding whether to run for federal office, and instead support the conclusion that DeSantis had already decided to run for president and was advancing that goal, even before publicly acknowledging his status as a federal candidate or complying with FECA’s requirements for candidates.
39. DeSantis’s fundraising further reinforces the conclusion that he had decided to seek federal office well before publicly acknowledging that decision: As detailed above, beginning in 2022 during his gubernatorial reelection campaign and through at least the end of April 2023, months after he had been reelected, DeSantis used Friends of Ron DeSantis to raise massive amounts of money — far in excess of what he needed to win reelection. Indeed, the fundraising and spending numbers bear this out: by the date of the 2022 election, DeSantis had raised over \$200 million, a record-shattering amount for a gubernatorial campaign, spent merely half of that (around \$100 million), and thus retained cash on hand (in Friends of Ron DeSantis) of over \$90 million — money plainly intended to seek the presidency in 2024. Indeed, DeSantis was barred under Florida state law from running for a third consecutive term as governor.<sup>60</sup>

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<sup>59</sup> Lowell, *supra* note 9.

<sup>60</sup> *Supra* note 4.

40. This extraordinary and unprecedented fundraising supports the conclusion that DeSantis was building a war chest for a 2024 presidential campaign, not for any state office. For comparison, although the Commission’s “testing the waters” regulations, which govern pre-candidacy exploratory activities, exempt from the definitions of “contribution” and “expenditure” any money raised and spent by individuals determining whether to run for federal office,<sup>61</sup> they also provide that this exemption “does not apply to funds received for activities indicating that an individual has decided to become a candidate for a particular office or for activities relevant to conducting a campaign,”<sup>62</sup> and an indicator that someone has made the decision to become a candidate includes, *e.g.*, “rais[ing] funds in excess of what could reasonably be expected to be used for exploratory activities or undertak[ing] activities designed to amass campaign funds that would be spent after” becoming a candidate.<sup>63</sup> “Rais[ing] funds in excess” perfectly describes DeSantis’s fundraising activities during the 2022 election cycle.
41. It is patently clear that DeSantis, by raising over \$200 million through November 2022, — of which over \$90 million remained untouched by the end of the 2022 election — was not merely fundraising for his 2022 reelection campaign, but was “amass[ing] campaign funds that would be spent” after becoming a federal candidate, an indicator that he had, in fact, already decided to run for president in 2024.<sup>64</sup>
42. Moreover, months after the 2022 election had ended, DeSantis was actively raising money and courting wealthy donors and influencers for an as-yet-undeclared presidential campaign, including at a February 2023 event in Palm Beach, Florida, featuring over 150

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<sup>61</sup> 11 C.F.R. § 100.72(a).

<sup>62</sup> *Id.* § 100.72(b).

<sup>63</sup> *Id.* § 100.72(b)(2).

<sup>64</sup> Dixon, *supra* note 14.

guests.<sup>65</sup> This high-profile event to court donors and influencers, while seeking to raise millions of dollars, provides further support for the conclusion that DeSantis was not merely deciding but had *already decided* to run for president in 2024.

43. In addition, DeSantis’s domestic and international travel between February and April of 2023 further bolsters the conclusion that he had decided to run for president and was essentially campaigning for that office, including by extolling his prior accomplishments, making the case for himself as a viable candidate, and burnishing his foreign policy experience, under the pretense of promoting a recent book and fostering trade relations.
44. From February 2023 through April 2023, DeSantis made stops across the country — including in states with early primaries and caucuses like Iowa, New Hampshire, and South Carolina, as well as states crucial to securing a general election victory, like Ohio and Virginia, where DeSantis gave a campaign stump speech listing his accomplishments and vision for the country — effectively making an early pitch for a presidential campaign platform to potential supporters.<sup>66</sup> This nationwide self-promotion tour, which is *de rigueur* for presidential candidates, supports the conclusion that DeSantis had already decided to run for president and was actively promoting his candidacy and raising funds for his campaign.
45. DeSantis’s recent international visits to Japan, South Korea, Israel and the United Kingdom likewise served as an opportunity for him to look and act the part of a president interacting with foreign allies for potential supporters — another commonplace practice for presidential candidates, particularly those without well-established foreign policy

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<sup>65</sup> Oliphant, *supra* note 15.

<sup>66</sup> *Supra* notes 16–23.

experience — thus again supporting the conclusion that he had already decided to seek the presidency.<sup>67</sup>

46. News reports and publicly available disclosure reports show that DeSantis has raised or spent far more than FECA's threshold amount of \$5,000 — through a combination of money raised by Friends of Ron DeSantis as well as outside funding for his travel — to support his 2024 candidacy.<sup>68</sup>
47. Even if these activities, viewed in isolation, might not independently indicate that DeSantis had decided to run for president, viewed as a whole, the overall record — including his astounding levels of fundraising, extensive travel for campaign-style events, and campaign hiring and planning activities — support finding reason to believe that DeSantis had decided to seek federal office by March 10, 2023, *i.e.*, several weeks before his public announcement of candidacy, and clearly before the over \$80 million dollar transfer from Friends of Ron DeSantis to Never PAC.
48. Moreover, based on DeSantis's campaign fundraising through Friends of Ron DeSantis,<sup>69</sup> as well as the reported payment of travel costs to de facto campaign events by outside donors, which would result in excessive and unreported in-kind contributions to his campaign, it is clear that DeSantis had raised and spent well in excess of \$5,000, the statutory threshold for federal candidate status, before his announcement and the transfer.<sup>70</sup>
49. Because DeSantis had both decided to run for federal office and raised or spent more than \$5,000 in contributions or expenditures, he became a federal candidate by March 10,

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<sup>67</sup> See *supra* notes 24–25.

<sup>68</sup> See *supra* notes 26–27.

<sup>69</sup> See *supra* note 27.

<sup>70</sup> See 52 U.S.C. § 30101(2); Berzon & O'Brien, *supra* note 26.

2023, and was thereafter required to abide by FECA’s restrictions on federal candidates — and any entities that they directly or indirectly establish, finance, maintain, or control — raising or spending “soft money” in connection with a federal election.<sup>71</sup>

50. Friends of Ron DeSantis is a nonfederal committee, a state PAC registered in Florida, that DeSantis, in official statements filed with Florida authorities, has acknowledged establishing, financing, maintaining, or controlling throughout virtually the entire period of the PAC’s existence and during the five-year period that it raised over \$225 million — of which \$86 million remained as of May 1, 2023 — in support of his state campaigns in Florida.<sup>72</sup>
51. Indeed, on January 5, 2018 — the same day that Friends of Ron DeSantis registered in Florida as a state PAC — DeSantis filed a statement of solicitation authorizing the PAC to raise money to support his 2018 campaign for Florida governor.<sup>73</sup> As part of that statement, DeSantis acknowledged that his “relationship” to the organization was that he had “established/maintain[ed]” Friends of Ron DeSantis.<sup>74</sup>
52. DeSantis kept that authorization in place for *over five years*, using Friends of Ron DeSantis as a vehicle to raise over \$225 million on his behalf during that period, including the very funds directed or transferred to Never PAC. Only after deciding to run for president in 2024, and after raising all of that money, which was subject to Florida law and not FECA’s requirements, did DeSantis — with his public announcement of a presidential candidacy only days away — withdraw his solicitation statement and

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<sup>71</sup> See 52 U.S.C. § 30125(e).

<sup>72</sup> See *supra* notes 29–32, 41.

<sup>73</sup> Statement of Solicitation, Ron DeSantis (Jan. 5, 2018) (attached as Ex. D).

<sup>74</sup> *Id.*

publicly distance himself from Friends of Ron DeSantis.<sup>75</sup> In fact, the letter DeSantis sent to withdraw his solicitation statement explicitly stated, “I am *no longer* associated with the political committee and do not directly or indirectly solicit, cause to be solicited, or accept any contributions on its behalf”<sup>76</sup> — confirming that DeSantis had, up to that point, been associated with Friends of Ron DeSantis and had been soliciting, causing to be solicited, and/or accepting contributions on the state PAC’s behalf.

53. To further create the appearance of distance between DeSantis and Friends of Ron DeSantis, Blaise Ingoglia, the state PAC’s new chairman, filed a new statement of solicitation on May 8, 2023, that indicated he maintained or controlled the organization, in contrast to DeSantis’s 2018 solicitation statement, which indicated that DeSantis “Established/Maintain[ed]” the state PAC.<sup>77</sup>
54. Friends of Ron DeSantis’s website, moreover, had long explicitly listed DeSantis as the “Associated Person” on whose behalf the state PAC raised funds, right up until DeSantis — as a clear prelude to publicly announcing his presidential campaign — withdrew his authorization, at which point the state PAC’s website changed the “Associated Person” featured on its home page to Ingoglia, its new chairperson.<sup>78</sup>
55. In a further effort to whitewash the state PAC, on May 15, 2023, Friends of Ron DeSantis changed its name to “Empower Parents PAC” and, with the change in the state PAC’s name, the website was altered entirely, thus eradicating any mention of its origins as an

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<sup>75</sup> Letter from Gov. Ron DeSantis to Bureau of Election Records, Florida Sec’y of State (May 5, 2023).

<sup>76</sup> *Id.* (emphasis added).

<sup>77</sup> Statement of Solicitation, Blaise Ingoglia (May 8, 2023) (attached as Ex. F).

<sup>78</sup> *See supra* notes 38–40.

entity that DeSantis established to raise over \$225 million for his state-level campaigns.<sup>79</sup>

A casual observer of the website would be unable to glean any connection to DeSantis.

56. These eleventh-hour, pretextual moves to distance DeSantis from Friends of Ron DeSantis — strategic actions clearly taken in view of an imminent public acknowledgement of his federal candidacy — do not alter the fact that DeSantis “established, financed, maintained, or controlled” the state PAC (even *after* he had become a federal candidate), or that the funds it raised are “soft money” that do not comport with FECA’s requirements. Indeed, DeSantis has acknowledged that he established and maintained the state PAC during the over-five-year period in which Friends of Ron DeSantis raised over \$225 million for him, per his signed statement of solicitation filed with Florida authorities.<sup>80</sup>
57. Moreover, the whitewashing of Friends of Ron DeSantis on the eve of DeSantis’s announcement of candidacy provides further support for the conclusion that DeSantis had previously decided to run for president, and deliberately delayed announcing that decision to evade compliance with FECA’s requirements, including its soft money prohibitions — an obvious, and ineffectual, attempt to avoid complying with the law, at the cost of voters’ interests.
58. Accordingly, there is ample information to establish that throughout the more-than-five-year period that Friends of Ron DeSantis raised \$225 million for DeSantis, of which over \$80 million was transferred to a federal super PAC, DeSantis had established, financed, maintained, or controlled Friends of Ron DeSantis.

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<sup>79</sup> *Id.*

<sup>80</sup> *Supra* note 32.

59. As a state PAC registered in Florida, raising funds subject only to Florida law, none of the money that Friends of Ron DeSantis raised was subject to FECA's contribution limits, source prohibitions, and reporting requirements.
60. On or after May 1, 2023, Friends of Ron DeSantis directed or transferred over \$80 million to Never PAC, a federal IEOPC.<sup>81</sup> Never PAC has already begun spending funds in connection with a federal election, making over \$944,000 in independent expenditures supporting DeSantis.<sup>82</sup>
61. Based on the foregoing, there is reason to believe that DeSantis and Friends of Ron DeSantis, an entity that DeSantis directly or indirectly established, financed, maintained, or controlled, violated 52 U.S.C. § 30125(e)(1)(A) by directing or transferring — either directly or through an agent — over \$80 million that did not comply with FECA's contribution limits, source prohibitions, and reporting requirements, to Never PAC, in connection with a federal election.

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<sup>81</sup> *Supra* notes 45–46.

<sup>82</sup> *Supra* note 47.



**PRAYER FOR RELIEF**

62. Wherefore, the Commission should find reason to believe that DeSantis and Friends of Ron DeSantis violated 52 U.S.C. § 30101 *et seq.*, and conduct an immediate investigation under 52 U.S.C. § 30109(a)(2).
63. Further, the Commission should seek appropriate sanctions for any and all violations, including civil penalties sufficient to deter future violations, injunctive relief to remedy these violations and prohibit any and all future violations, and such additional remedies as are necessary and appropriate to ensure compliance with FECA.

Respectfully submitted,

/s/ Saurav Ghosh  
Campaign Legal Center, by  
Saurav Ghosh, Esq.  
1101 14th Street NW, Suite 400  
Washington, DC 20005  
(202) 736-2200

Saurav Ghosh, Esq.  
Campaign Legal Center  
1101 14th Street NW, Suite 400  
Washington, DC 20005  
Counsel to the Campaign Legal Center

May 30, 2023

**VERIFICATION**

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

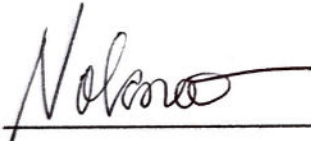
Sworn pursuant to 18 U.S.C. § 1001.

For Complainant Campaign Legal Center



Saurav Ghosh, Esq.

Sworn to and subscribed before me this 20<sup>TH</sup> day of May 2023.



Notary Public

KAYLA A NOLASCO  
NOTARY PUBLIC  
REG. # 7993702  
COMMONWEALTH OF VIRGINIA  
MY COMMISSION EXPIRES JANUARY 31, 2026

# EXHIBIT A

**HAND DELIVERED**

**STATEMENT OF ORGANIZATION  
OF POLITICAL COMMITTEE**

(PLEASE TYPE)

**\*\*\*AMENDED STATEMENT\*\*\***

OFFICE USE ONLY

RECEIVED  
DEPARTMENT OF STATE

2023 MAY 15 PM 2:29

DIVISION OF ELECTIONS  
TALLAHASSEE, FL

**1. Full Name of Committee**  
Empower Parents PAC (70275)

Telephone  
(813) 254-3369

Mailing Address (include city, state and zip code)  
610 South Boulevard, Tampa, FL 33606

Street Address (include city, state and zip code)  
610 South Boulevard, Tampa, FL 33606

**2. Affiliated or Connected Organizations (includes other committees of continuous existence and political committees)**

Name of Affiliated or Connected Organization	Mailing Address	Relationship
None		

**3. Area, Scope and Jurisdiction of the Committee**

Statewide political committee supporting or opposing statewide, legislative, multi-county, county, and municipal candidates and/or issues and any other activities not prohibited by Chapter 106, Florida Statutes.

**4. Nature of Organization or Organization's Special Interest (e.g., medical, legal, education, etc.)**

Political

**5. Identify by Name, Address and Position, the Custodian of Books and Accounts (include treasurer's name)**

Full Name	Mailing Address	Committee Title or Position
Nancy H. Watkins	610 South Boulevard Tampa, FL 33606	Treasurer

**6. List by Name, Address and Position, Other Principal Officers, Including Officers and Members of the Finance Committee, If Any (include chairman's name)**

Full Name	Mailing Address	Committee Title or Position
Blaise Ingoglia	610 South Boulevard Tampa, FL 33606	Chairperson
Robert I. Watkins	610 South Boulevard Tampa, FL 33606	Deputy Treasurer

**7. List by Name, Address, Office Sought and Party Affiliation Each Candidate or Other Individual that this Committee is Supporting (if none, please indicate)**

Full Name	Mailing Address	Office Sought	Party
TBD			

**8. List Any Issues this Committee is Supporting:** None at this time.

**List Any Issues this Committee is Opposing:** None at this time.

**9. If this Committee is Supporting the Entire Ticket of a Party, Give Name of Party**

N/A

**10. In the Event of Dissolution, What Disposition will be Made of Residual Funds?**

Contribute to candidates, political committees, party committees, other political organizations exempt under IRC Section 527, charitable organizations, or any other activities or disposition not prohibited by law.

**11. List all Banks, Safety Deposit Boxes, or Other Depositories Used for Committee Funds**

Name of Bank or Depository & Account Number	Mailing Address
The Bank of Tampa	601 Bayshore Blvd. Tampa, FL 33606

**12. List all Reports Required to be Filed by this Committee with Federal Officials and the Names, Addresses and Positions of Such Officials, If Any**

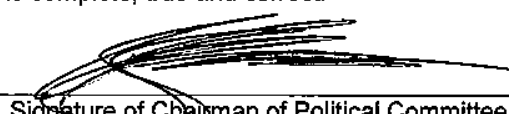
Report Title	Dates Required to be Filed	Name & Position of Official	Mailing Address
Form 8871 Form 1120POL Form 990, as may be required	Upon formation March 15 of each year May 15 of each year	For all: Internal Revenue Service Center	For all: Ogden UT 84201

STATE OF Florida Hernando COUNTY

I, Blaise Ingoglia, certify that the information in this Statement of

Organization is complete, true and correct.

**X**

  
Signature of Chairman of Political Committee

05/15/23

Date

**HAND DELIVERED**

RECEIVED  
DEPARTMENT OF STATE

**Empower Parents PAC**

610 S. Boulevard, Tampa, Florida 33606

2023 MAY 15 PM 2:30

DIVISION OF ELECTIONS  
TALLAHASSEE, FL

May 15, 2023

**HAND DELIVERED**

Ms. Donna S. Brown  
Chief, Bureau of Election Records  
Florida Department of State  
R.A. Gray Building, Room 316  
500 South Bronough Street  
Tallahassee, FL 32399-0250

**RE: Political Committee (70275) Amended Statement of Organization**

Dear Ms. Brown:

Enclosed please find an Amended Statement of Organization for the political committee, Friends of Ron DeSantis (70275) submitted in accordance with section 106.03(4), Florida Statutes. Among the changes reflected in the Amended Statement of Organization is that the political committee's name has been changed to Empower Parents PAC. Please update the Division's records accordingly.

Sincerely,



Blaise Ingoglia  
Chairman

cc: Nancy Watkins, Treasurer

# EXHIBIT B

HAND DELIVERED

**STATEMENT OF ORGANIZATION  
OF POLITICAL COMMITTEE**

(PLEASE TYPE)

RECEIVED  
OFFICE USE ONLY  
2018 JAN -5 AM 8:12  
TRENTON STATE  
DIVISION OF ELECTIONS

**1. Full Name of Committee**

Friends of Ron DeSantis

Telephone

904-359-2000

Mailing Address (include city, state and zip code)

One Independent Drive, Suite 1300  
Jacksonville, FL 32202

Street Address (include city, state and zip code)

One Independent Drive, Suite 1300  
Jacksonville, FL 32202

**2. Affiliated or Connected Organizations (includes other committees of continuous existence and political committees)**

Name of Affiliated or  
Connected Organization

Mailing Address

Relationship

None

**3. Area, Scope and Jurisdiction of the Committee**

Statewide political committee to support statewide candidate or other activity not prohibited by Chapter 106 F.S.

**4. Nature of Organization or Organization's Special Interest (e.g., medical, legal, education, etc.)**

Political

**5. Identify by Name, Address and Position, the Custodian of Books and Accounts (include treasurer's name)**

Full Name

Mailing Address

Committee Title or Position

Erika E. Alba

One Independent Drive, Suite 1300  
Jacksonville, FL 32202

Treasurer



**6. List by Name, Address and Position, Other Principal Officers, Including Officers and Members of the Finance Committee, If Any (include chairman's name)**

Full Name	Mailing Address	Committee Title or Position
Erika E. Alba	One Independent Drive, Suite 1300 Jacksonville, FL 32202	Chair
Brad Herold	One Independent Drive, Suite 1300 Jacksonville, FL 32202	Deputy Treasurer

**7. List by Name, Address, Office Sought and Party Affiliation Each Candidate or Other Individual that this Committee is Supporting (if none, please indicate)**

Full Name	Mailing Address	Office Sought	Party
Ron DeSantis	One Independent Drive, Suite 1300 Jacksonville, FL 32202	Governor	Republican

**8. List Any Issues this Committee is Supporting:** None

**List Any Issues this Committee is Opposing:** None

**9. If this Committee is Supporting the Entire Ticket of a Party, Give Name of Party**

n/a

**10. In the Event of Dissolution, What Disposition will be Made of Residual Funds?**

Contribute to candidates, political parties, political committees or other activities not prohibited by law.

**11. List all Banks, Safety Deposit Boxes, or Other Depositories Used for Committee Funds**

Name of Bank or Depository & Account Number	Mailing Address
SunTrust Bank	76 S. Laura Street Jacksonville, FL 32202

**12. List all Reports Required to be Filed by this Committee with Federal Officials and the Names, Addresses and Positions of Such Officials, If Any**

Report Title	Dates Required to be Filed	Name & Position of Official	Mailing Address
Form 8871 Form 1120-POL Form 990, as may be required	Upon formation March 15, annually May 15, annually	Internal Revenue Service	Ogden, UT 84201

STATE OF Florida ☒

Duval ☒

COUNTY

I, Erika E. Alba, certify that the information in this Statement of

Organization is complete, true and correct.

**X**



Signature of Chairman of Political Committee

January 2, 2018  
Date



HAND DELIVERED

RECEIVED  
DEPARTMENT OF STATE

2018 JAN -5 AM 8:12

DEPARTMENT OF STATE  
DIVISION OF ELECTIONS

January 2, 2018

ATTORNEYS AT LAW

ONE INDEPENDENT DRIVE, SUITE 1300  
JACKSONVILLE, FL 32202-5017  
904.359.2000 TEL  
904.359.8700 FAX  
WWW.FOLEY.COM

WRITER'S DIRECT LINE  
904.359.8721  
elalba@foley.com EMAIL

CLIENT/MATTER NUMBER  
ClientNumber-MatterNumber

Ms. Kristi Bronson  
Division of Elections  
RA Gray Building, Suite 316  
500 S. Bronough Street  
Tallahassee, FL 32399

Re: Formation Documents for the Political Committee Entitled  
"Friends of Ron DeSantis"

Dear Ms. Bronson:

Enclosed please find formation documents (DS-DE 5, DS-DE 6, and DS-DE 41) for creation of the political committee entitled Friends of Ron DeSantis.

Please do not hesitate to contact me if you have any further questions regarding this submission.

Sincerely,

Erika E. Alba  
Counsel

EEA:

BOSTON  
BRUSSELS  
CHICAGO  
DETROIT

JACKSONVILLE  
LOS ANGELES  
MADISON  
MIAMI

MILWAUKEE  
NEW YORK  
ORLANDO  
SACRAMENTO

SAN DIEGO  
SAN FRANCISCO  
SILICON VALLEY  
TALLAHASSEE

TAMPA  
TOKYO  
WASHINGTON, D.C.

# EXHIBIT C

**APPOINTMENT OF CAMPAIGN TREASURER  
AND DESIGNATION OF CAMPAIGN  
DEPOSITORY FOR  
POLITICAL COMMITTEES**  
(Sections 106.011(1) and 106.021(1), F.S.)

RECEIVED  
DEPARTMENT OF STATE  
2018 AUG 22 AM 10:31  
DIVISION OF ELECTIONS  
TALLAHASSEE FL

CHECK APPROPRIATE BOX:

OFFICE USE ONLY

☐ Original Appointment of Treasurer ☒ Reappointment of Treasurer ☐ Deputy Treasurer

1. Committee or Organization

Friends of Ron DeSantis

2. Telephone

(813 ) 254-3369

3. Name of Treasurer or Deputy Treasurer

Nancy H. Watkins

4. Email (optional)

nwatkins@robertwatkins.com

5. Telephone (optional)

( )

6. Mailing Address

610 S. Boulevard, Tampa FL 33606

7. Street Address

610 S. Boulevard, Tampa FL 33606

8. The following bank has been designated as the



Primary Depository



Secondary Depository

9. Name of Bank

The Bank of Tampa

10. Street Address

601 Bayshore Blvd.

11. City

Tampa

12. State

FL

13. Zip Code

33606

14. Signature of Chairman

X 

15. Name of Chairman (Print or Type)

Robert I. Watkins

**Campaign Treasurer's Acceptance of Appointment**

I, Nancy H. Watkins

, do hereby accept the appointment as

(Please Print or Type)

treasurer or deputy treasurer for

Friends of Ron DeSantis

(Committee or Organization)

UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING CAMPAIGN TREASURER'S  
ACCEPTANCE OF APPOINTMENT AND THAT THE FACTS STATED ARE TRUE.

8/21/18

Date

X



Signature of Campaign Treasurer or Deputy Treasurer

# EXHIBIT D

HAND DELIVERED

**STATEMENT OF  
SOLICITATION**

(Section 106.0701, Florida Statutes)

RECEIVED  
DEPARTMENT OF STATE

2018 JAN -5 AM 8:13

FLORIDA STATE  
DIVISION OF ELECTIONS**Office Use Only**

Tracking: \_\_\_\_\_

Account: \_\_\_\_\_

**PART A**☐ Office Holder: (Choose One)☒ Candidate: Governor

Name

Ron DeSantis

Telephone

(904) 359-2000

Mailing Address

One Independent Drive, Suite 1300

Email Address

Elalba@foley.com

City

Jacksonville

State

Florida

Zip Code

32202

Name of Organization

Friends of Ron DeSantis

**PART B**Relationship Between Office Holder or Candidate and Organization  
(in whole or in part): Established/Maintain

Organization Type:

527

**PART C**

Web Address as Required by Section 106.0701(3), F.S. (if website has not been created, put "To be determined") www.FriendsOfRonDeSantis.com

**PART D**

3 Jan 2018

Date



Signature of Office Holder or Candidate

**INSTRUCTIONS FOR COMPLETING AND FILING FORM DS-DE 102  
STATEMENT OF SOLICITATION****Introductory Information**

As this form utilizes drop-down menus, you must enter the information directly on the form prior to printing. After printing, sign the document. Fax or mail **PAGE 1** of the form to the **Division of Elections, Bureau of Election Records, R. A. Gray Building, Room 316, 500 South Bronough Street, Tallahassee, Florida 32399-0250; Fax Number 850-245-6259.**

**Who Must File Form DS-DE 102**

The Governor, Lieutenant Governor, members of the Cabinet, state legislators, or candidates for such offices who directly or indirectly solicit, cause to be solicited, or accept any contribution on behalf of an organization that is exempt from taxation under s. 527 or s. 501(c)(4) of the Internal Revenue Code, which such individuals, in whole or in part, establish, maintain, or control, must file Form DS-DE 102.

# EXHIBIT E

HAND DELIVERED

May 5, 2023

RECEIVED  
DEPARTMENT OF STATE

2023 MAY -5 PM 12:21

DIVISION OF ELECTIONS  
TALLAHASSEE, FL

**HAND DELIVERED**

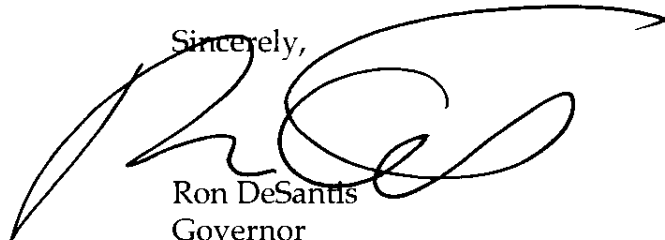
Ms. Donna S. Brown  
Chief, Bureau of Election Records  
Florida Department of State  
R.A. Gray Building, Room 316  
500 South Bronough Street  
Tallahassee, FL 32399-0250

**Re: Withdrawal of Statement of Solicitation- Friends of Ron DeSantis  
(70275)**

Dear Ms. Brown:

Pursuant to this letter, I hereby withdraw my Statement of Solicitation for the political committee, Friends of Ron DeSantis. I am no longer associated with the political committee and do not directly or indirectly solicit, cause to be solicited, or accept any contributions on its behalf. Please update the Division's records accordingly.

Sincerely,

A large, stylized handwritten signature in black ink, appearing to be 'RD', is written over the typed name and title.

Ron DeSantis  
Governor



# EXHIBIT F

# STATEMENT OF SOLICITATION

(Section 106.0701, Florida Statutes)

RECEIVED  
DEPARTMENT OF STATE

2023 MAY -8 AM 10:36

DIVISION OF ELECTIONS  
TALLAHASSEE, FL

## Office Use Only

Tracking: \_\_\_\_\_

Account: \_\_\_\_\_

## PART A

☒ Office Holder: Legislator

☐ Candidate: (Choose One)

Name

Blaise Ingoglia

Telephone

(813) 254-3369

Mailing Address

610 South Boulevard

Email Address

blaise.ingoglia.fl@gmail.com

City

Tampa

State

Florida

Zip Code

33606

Name of Organization

Friends of Ron DeSantis

## PART B

Relationship Between Office Holder or Candidate and Organization  
(in whole or in part): Maintain/Control

Organization Type:

527

## PART C

Web Address as Required by Section 106.0701(3), F.S. (if website has not been created, put "To be determined") www.friendsofrondesantis.com

## PART D

5/8/2023

Date

  
Signature of Office Holder or Candidate

## INSTRUCTIONS FOR COMPLETING AND FILING FORM DS-DE 102 STATEMENT OF SOLICITATION

### Introductory Information

As this form utilizes drop-down menus, you must enter the information directly on the form prior to printing. After printing, sign the document. Fax or mail **PAGE 1** of the form to the **Division of Elections, Bureau of Election Records, R. A. Gray Building, Room 316, 500 South Bronough Street, Tallahassee, Florida 32399-0250; Fax Number 850-245-6259.**

### Who Must File Form DS-DE 102

The Governor, Lieutenant Governor, members of the Cabinet, state legislators, or candidates for such offices who directly or indirectly solicit, cause to be solicited, or accept any contribution on behalf of an organization that is exempt from taxation under s. 527 or s. 501(c)(4) of the Internal Revenue Code, which such individuals, in whole or in part, establish, maintain, or control, must file Form DS-DE 102.

# EXHIBIT G



Friends of Ron DeSantis is a statewide political committee that is committed to advancing the Freedom Agenda and keeping Florida free.

Associated person: Ron DeSantis

FRIENDS OF  
**RON DESANTIS**

Sponsored by Friends of Ron DeSantis, 610 S. Boulevard, Tampa, FL 33606.

Use of military rank, job title, and photograph in uniform does not imply endorsement by the Department of Defense.

# EXHIBIT H



## PROTECT PARENTAL RIGHTS IN EDUCATION

[ADD YOUR NAME](#)

**Empower Parents PAC** supports the advancement of issues and candidates committed to protecting parental rights in education.

**Associated Person:** Blaise Ingoglia



[Privacy Policy](#)

Sponsored by Empower Parents PAC, 610 S. Boulevard, Tampa, FL 33606.

# EXHIBIT I



# Florida Department of State Division of Elections

## Empower Parents PAC

### Campaign Finance Activity

**Note:** The information presented below was obtained from the Committee's/Candidate's Campaign Treasurer's Report filed with the Division of Elections. [About the Campaign Finance Data Base](#). If all contributions for a reporting period are less than 1 dollar Then they may not be displayed.

	Filing Period	Contributions			Expend	Other	Transfers
		Monetary	Loans	InKind			
<input type="radio"/>	01/01/2018 - 01/31/2018	3,210,395.33	0.00	0.00	80.30	0.00	0.00
<input type="radio"/>	02/01/2018 - 02/28/2018	1,616,000.50	0.00	0.00	33,901.50	0.00	0.00
<input type="radio"/>	03/01/2018 - 03/31/2018	1,030,900.00	0.00	3,625.00	121,613.98	0.00	0.00
<input type="radio"/>	04/01/2018 - 04/30/2018	462,000.00	0.00	3,317.19	53,846.68	0.00	0.00
<input type="radio"/>	05/01/2018 - 05/31/2018	2,610,700.00	0.00	600.00	98,843.46	0.00	0.00
<input type="radio"/>	06/01/2018 - 06/22/2018	820,900.00	0.00	1,857.75	1,702,663.89	0.00	0.00
<input type="radio"/>	06/23/2018 - 06/29/2018	328,500.00	0.00	0.00	2,220,375.23	0.00	0.00
<input type="radio"/>	06/30/2018 - 07/06/2018	275,000.00	0.00	600.00	49,759.35	0.00	0.00
<input type="radio"/>	07/07/2018 - 07/13/2018	145,000.00	0.00	0.00	607,909.66	0.00	0.00
<input type="radio"/>	07/14/2018 - 07/20/2018	408,500.00	0.00	0.00	2,217,348.69	0.00	0.00
<input type="radio"/>	07/21/2018 - 07/27/2018	574,015.98	0.00	0.00	1,053,119.24	0.00	0.00
<input type="radio"/>	07/28/2018 - 08/03/2018	634,500.00	0.00	600.00	2,459,177.23	0.00	0.00
<input type="radio"/>	08/04/2018 - 08/10/2018	345,000.00	0.00	8,200.00	147,887.53	0.00	0.00
<input type="radio"/>	08/11/2018 - 08/23/2018	597,250.00	0.00	15,590.17	1,093,297.22	0.00	0.00
<input type="radio"/>	08/24/2018 - 08/24/2018	58,500.00	0.00	176.28	1,496.50	0.00	0.00
<input type="radio"/>	08/25/2018 - 08/31/2018	246,000.00	0.00	754.63	557,398.93	0.00	0.00
<input type="radio"/>	09/01/2018 - 09/07/2018	1,023,000.07	0.00	0.00	89,885.55	0.00	0.00
<input type="radio"/>	09/08/2018 - 09/14/2018	2,607,500.00	0.00	25,554.42	2,024,807.86	461.23	0.00
<input type="radio"/>	09/15/2018 - 09/21/2018	2,264,550.00	0.00	9,300.00	2,727,360.59	0.00	0.00
<input type="radio"/>	09/22/2018 - 09/28/2018	3,745,200.00	0.00	0.00	2,574,335.14	0.00	0.00
<input type="radio"/>	09/29/2018 - 10/05/2018	7,062,155.00	0.00	3,400.00	6,532,669.12	0.00	0.00



	10/06/2018 - 10/12/2018	1,677,325.00	0.00	0.00	4,784,897.35	0.00	0.00
	10/13/2018 - 10/19/2018	3,386,500.00	0.00	0.00	2,013,669.04	0.00	0.00
	10/20/2018 - 10/26/2018	2,833,648.00	0.00	0.00	0.00	0.00	0.00
	10/27/2018 - 10/27/2018	250.00	0.00	0.00	0.00	0.00	0.00
	10/28/2018 - 10/28/2018	20,000.00	0.00	0.00	0.00	0.00	0.00
	10/29/2018 - 10/29/2018	562,050.00	0.00	0.00	0.00	0.00	0.00
	10/30/2018 - 10/30/2018	1,214,400.00	0.00	0.00	0.00	0.00	0.00
	10/31/2018 - 10/31/2018	605,600.00	0.00	0.00	0.00	0.00	0.00
	10/20/2018 - 11/01/2018	236,375.00	0.00	0.00	6,902,975.71	7,929.18	0.00
	11/02/2018 - 11/30/2018	394,800.00	0.00	0.00	882,029.24	4,202.67	0.00
	12/01/2018 - 12/31/2018	5,000.00	0.00	0.00	3,990.06	542.57	0.00
	01/01/2019 - 01/31/2019	0.00	0.00	0.00	370.00	0.00	0.00
	02/01/2019 - 02/28/2019	150,000.00	0.00	0.00	1,350.00	0.00	0.00
	03/01/2019 - 03/31/2019	135,000.00	0.00	0.00	18,371.29	0.00	0.00
	04/01/2019 - 04/30/2019	135,000.00	0.00	7,792.56	10,116.58	0.00	0.00
	05/01/2019 - 05/31/2019	430,416.00	0.00	6,495.20	11,085.29	0.00	0.00
	06/01/2019 - 06/30/2019	713,000.00	0.00	5,449.19	64,785.84	0.00	0.00
	07/01/2019 - 07/31/2019	340,000.00	0.00	6,620.00	12,454.88	0.00	0.00
	08/01/2019 - 08/31/2019	675,500.00	0.00	9,409.50	20,716.00	0.00	0.00
	09/01/2019 - 09/30/2019	80,500.00	0.00	0.00	17,449.61	2,212.01	0.00
	10/01/2019 - 10/31/2019	834,625.00	0.00	70.04	61,005.65	0.00	0.00
	11/01/2019 - 11/30/2019	701,806.54	0.00	400.00	-28,214.87	728.50	0.00
	12/01/2019 - 12/31/2019	1,242,269.58	0.00	6,485.50	21,899.48	0.00	0.00
	01/01/2020 - 01/31/2020	714,924.34	0.00	13,216.46	21,246.21	1,550.00	0.00
	02/01/2020 - 02/29/2020	670,374.40	0.00	5,162.03	10,983.90	0.00	0.00
	03/01/2020 - 03/31/2020	461,204.29	0.00	0.00	13,646.92	405.48	0.00
	04/01/2020 - 04/30/2020	317.22	0.00	0.00	11,038.78	0.00	0.00
	05/01/2020 - 05/31/2020	-12,241.67	0.00	0.00	9,950.50	0.00	0.00
	06/01/2020 - 06/12/2020	0.00	0.00	0.00	8,750.00	0.00	0.00
	06/13/2020 - 06/19/2020	0.00	0.00	0.00	2,405.00	0.00	0.00
W	06/20/2020 - 06/26/2020	0.00	0.00	0.00	0.00	0.00	0.00
	06/27/2020 - 07/03/2020	285.06	0.00	0.00	8,750.00	0.00	0.00
W	07/04/2020 - 07/10/2020	0.00	0.00	0.00	0.00	0.00	0.00
W	07/11/2020 - 07/17/2020	0.00	0.00	0.00	0.00	0.00	0.00
W	07/18/2020 - 07/24/2020	0.00	0.00	0.00	0.00	0.00	0.00

<input type="radio"/>	07/25/2020 - 07/31/2020	276.17	0.00	0.00	1,673.50	0.00	0.00
<input type="radio"/>	08/01/2020 - 08/13/2020	0.00	0.00	0.00	9,098.50	0.00	0.00
<b>W</b>	08/14/2020 - 08/14/2020	0.00	0.00	0.00	0.00	0.00	0.00
<b>W</b>	08/15/2020 - 08/21/2020	0.00	0.00	0.00	0.00	0.00	0.00
<b>W</b>	08/22/2020 - 08/28/2020	0.00	0.00	0.00	0.00	0.00	0.00
<input type="radio"/>	08/29/2020 - 09/04/2020	276.18	0.00	0.00	8,750.00	0.00	0.00
<b>W</b>	09/05/2020 - 09/11/2020	0.00	0.00	0.00	0.00	0.00	0.00
<b>W</b>	09/12/2020 - 09/18/2020	0.00	0.00	0.00	0.00	0.00	0.00
<input type="radio"/>	09/19/2020 - 09/25/2020	10,000.00	0.00	0.00	0.00	0.00	0.00
<input type="radio"/>	09/26/2020 - 10/02/2020	50,267.32	0.00	0.00	602.30	0.00	0.00
<input type="radio"/>	10/03/2020 - 10/09/2020	200,000.00	0.00	0.00	8,750.00	0.00	0.00
<input type="radio"/>	10/10/2020 - 10/16/2020	235,000.00	0.00	0.00	0.00	0.00	0.00
<input type="radio"/>	10/17/2020 - 10/23/2020	261,630.00	0.00	2,254.00	0.00	0.00	0.00
<b>W</b>	10/24/2020 - 10/24/2020	0.00	0.00	0.00	0.00	0.00	0.00
<b>W</b>	10/25/2020 - 10/25/2020	0.00	0.00	0.00	0.00	0.00	0.00
<b>W</b>	10/26/2020 - 10/26/2020	0.00	0.00	0.00	0.00	0.00	0.00
<b>W</b>	10/27/2020 - 10/27/2020	0.00	0.00	0.00	0.00	0.00	0.00
<b>W</b>	10/28/2020 - 10/28/2020	0.00	0.00	0.00	0.00	0.00	0.00
<input type="radio"/>	10/17/2020 - 10/29/2020	0.00	0.00	0.00	20.30	0.00	0.00
<input type="radio"/>	10/30/2020 - 10/31/2020	30,267.29	0.00	0.00	0.00	0.00	0.00
<input type="radio"/>	11/01/2020 - 11/30/2020	521,776.21	0.00	3,270.00	12,411.50	0.00	0.00
<input type="radio"/>	12/01/2020 - 12/31/2020	502,278.96	0.00	453.88	46,598.38	0.00	0.00
<input type="radio"/>	01/01/2021 - 01/31/2021	705,137.87	0.00	1,155.00	1,350.00	0.00	0.00
<input type="radio"/>	02/01/2021 - 02/28/2021	3,220,101.23	0.00	200.00	25,066.50	0.00	0.00
<input type="radio"/>	03/01/2021 - 03/31/2021	5,142,794.50	0.00	0.00	43,209.54	0.00	0.00
<input type="radio"/>	04/01/2021 - 04/30/2021	13,979,141.16	0.00	0.00	73,041.44	0.00	0.00
<input type="radio"/>	05/01/2021 - 05/31/2021	7,582,349.78	0.00	4,686.62	92,547.94	0.00	0.00
<input type="radio"/>	06/01/2021 - 06/30/2021	5,552,987.40	0.00	627.55	339,325.94	18,655.74	0.00
<input type="radio"/>	07/01/2021 - 07/31/2021	4,228,978.38	0.00	15,277.06	329,318.83	0.00	0.00
<input type="radio"/>	08/01/2021 - 08/31/2021	5,517,568.02	0.00	22,274.59	692,269.21	0.00	0.00
<input type="radio"/>	09/01/2021 - 09/30/2021	5,472,974.14	0.00	217,203.89	228,814.58	0.00	0.00
<input type="radio"/>	10/01/2021 - 10/31/2021	4,658,624.81	0.00	42,661.21	372,115.89	0.00	0.00
<input type="radio"/>	11/01/2021 - 11/30/2021	4,531,294.99	0.00	50,370.53	395,879.23	1,918.67	0.00
<input type="radio"/>	12/01/2021 - 12/31/2021	3,666,801.18	0.00	27,721.00	251,815.82	397.66	0.00

01/01/2022 - 01/31/2022	7,723,859.86	0.00	105,367.55	110,066.71	197.20	0.00
02/01/2022 - 02/28/2022	6,543,046.76	0.00	314,508.49	136,191.76	1,667.40	0.00
03/01/2022 - 03/31/2022	7,207,970.47	0.00	85,131.60	174,904.14	481.84	0.00
04/01/2022 - 04/30/2022	8,156,640.48	0.00	155,942.43	251,350.36	388.19	0.00
05/01/2022 - 05/31/2022	8,853,741.38	0.00	202,466.31	2,596,253.86	1,649.20	0.00
06/01/2022 - 06/17/2022	2,566,771.22	0.00	39,826.77	960,943.93	1,038.50	0.00
06/18/2022 - 06/24/2022	1,044,771.14	0.00	100,521.93	12,453.80	0.00	0.00
06/25/2022 - 07/01/2022	2,977,287.25	0.00	187,081.26	948,677.94	338.62	0.00
07/02/2022 - 07/08/2022	11,144,772.98	0.00	35,991.00	123,347.21	698.92	0.00
07/09/2022 - 07/15/2022	1,182,202.33	0.00	18,039.00	1,111,250.88	1,688.76	0.00
07/16/2022 - 07/22/2022	1,387,110.00	0.00	181,428.89	36,724.46	0.00	0.00
07/23/2022 - 07/29/2022	2,877,898.39	0.00	29,961.60	466,690.74	1,754.10	0.00
07/30/2022 - 08/05/2022	2,287,144.05	0.00	6,581.48	2,219,407.26	1,094.84	0.00
08/06/2022 - 08/18/2022	3,479,090.47	0.00	53,468.00	6,002,605.88	1,137.69	0.00
08/19/2022 - 08/19/2022	56,785.00	0.00	9,936.00	2,541.25	0.00	0.00
08/20/2022 - 08/26/2022	1,138,188.01	0.00	38,352.80	3,360,304.30	541.70	0.00
08/27/2022 - 09/02/2022	1,253,981.88	0.00	47,553.09	8,191,684.92	0.00	0.00
09/03/2022 - 09/09/2022	643,867.00	0.00	28,143.68	4,581,824.10	0.00	0.00
09/10/2022 - 09/16/2022	2,254,188.00	0.00	92,536.07	6,422,987.34	3,006.78	0.00
09/17/2022 - 09/23/2022	1,724,003.90	0.00	51,632.87	5,910,241.20	797.90	0.00
09/24/2022 - 09/30/2022	5,392,343.87	0.00	1,212.00	9,432,326.61	42.09	0.00
10/01/2022 - 10/07/2022	495,182.00	0.00	0.00	4,643,666.47	679.76	0.00
10/08/2022 - 10/14/2022	2,867,566.00	0.00	66,756.96	6,814,838.65	820.83	0.00
10/15/2022 - 10/21/2022	3,473,255.40	0.00	98,104.42	11,136,918.84	726.98	0.00
10/22/2022 - 10/28/2022	4,065,252.76	0.00	122,400.04	0.00	0.00	0.00
10/29/2022 - 10/29/2022	3,391.44	0.00	7,209.00	0.00	0.00	0.00
10/30/2022 - 10/30/2022	375,558.76	0.00	20,462.40	0.00	0.00	0.00
10/31/2022 - 10/31/2022	381,222.94	0.00	0.00	0.00	0.00	0.00
11/01/2022 - 11/01/2022	802,501.88	0.00	27,659.51	0.00	0.00	0.00
11/02/2022 - 11/02/2022	774,265.32	0.00	14,625.70	0.00	0.00	0.00
10/22/2022 - 11/03/2022	1,446,233.22	0.00	10,788.80	28,717,543.01	1,168.21	0.00
11/04/2022 - 11/30/2022	2,428,992.50	0.00	21,143.25	786,936.34	1,586.71	0.00
12/01/2022 - 12/31/2022	326,746.98	0.00	50,335.65	-8,101,375.22	3,549.49	0.00
01/01/2023 - 01/31/2023	350,488.79	0.00	17,989.00	415,867.45	2,392.82	0.00
02/01/2023 - 02/28/2023	9,982,056.18	0.00	47,419.00	-2,075,761.06	985.40	0.00

<input type="radio"/>	03/01/2023 - 03/31/2023	3,679,136.89	0.00	9,002.89	258,019.64	5,710.28	0.00
<input type="radio"/>	04/01/2023 - 04/30/2023	161,909.92	0.00	54,030.00	231,244.22	1,846.92	0.00
<input checked="" type="radio"/>	<b>All Dates (Totals)</b>	225,854,446.65	0.00	2,876,440.69	140,066,836.50	74,994.84	0.00

Note: <sup>(E)</sup> indicates that report was filed electronically

**X** Indicates that detail has not been released

**W** Indicates that a waiver was filed and **L** Indicates that a loan report was filed

Select Detail Type

Contributions

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Date(Ascending)

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