

**BEFORE THE  
FEDERAL ELECTION COMMISSION**

Kyle Herrig, President  
Accountable.US  
1919 M Street NW, Suite 450  
Washington, DC 20036

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

Respondents.

**COMPLAINT**

This complaint is filed under 52 U.S.C. § 30109(a)(1) against George Anthony Devolder-Santos ("George Santos") and Devolder-Santos for Congress (the "Committee") and Nancy Marks, in her official capacity as treasurer, (collectively "Respondents") for violating provisions of the Federal Election Campaign Act of 1971, as amended (the "Act"), and Federal Election Commission (the "FEC" or "Commission") regulations. Shortly after his election to the U.S. House of Representatives, news reports revealed that George Santos had deliberately fabricated nearly every aspect of his background, including his employment, education, and finances. These revelations led to other questions about George Santos's campaign finance activities and whether he falsified information on his personal financial disclosure reports. A review of his campaign's

disclosure reports filed with the Federal Election Commission shows that George Santos and his campaign may have committed a number of campaign finance violations during the 2022 election cycle.

First, disclosure reports show that Santos's campaign received over \$100,000 in excessive contributions over the course of the election cycle, yet the Committee has not refunded, redesignated, or reattributed these contributions. Second, publicly available information indicates that the Committee paid for expenses that appear related to his business, not his federal campaign, and made rental payments at a home where he was living, in clear violation of the prohibition on converting campaign funds to personal use. Third, George Santos became a federal candidate in April 2021, yet the Committee did not file a Statement of Organization until November 2021.

As discussed below, the available information contains compelling evidence that Respondents have engaged in substantial campaign finance violations. Accordingly, the Commission should find reason to believe that Respondents: (1) violated 52 U.S.C. § 30116(f) and 11 C.F.R. §§ 103(b)(3), 110.9 by accepting excessive contributions; (2) violated 52 U.S.C. § 30114(b) by converting campaign funds to personal use; and (3) violated 52 U.S.C. § 30103(a) by failing to timely file the required Statement of Organization. Further, the Commission should immediately commence an investigation to determine the full scope of these violations, fine Respondents the maximum penalty under the law, and enjoin them from committing future violations.

#### **BACKGROUND**

George Santos was elected to the U.S. House of Representatives for New York's 3rd Congressional District in the 2022 general election.<sup>1</sup> He filed his Statement of Candidacy on April

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<sup>1</sup> See Devolder-Santos for Congress, Statement of Candidacy (April 17, 2021), <https://docquery.fec.gov/pdf/781/202104179443792781/202104179443792781.pdf>.

17, 2021.<sup>2</sup> Approximately seven months later, on November 5, 2021, the Committee filed its Statement of Organization.<sup>3</sup>

After the November 2022 general election, news sources reported that George Santos falsified certain aspects of his background, including his employment, education history, property ownership, and finances.<sup>4</sup> George Santos recently admitted to many of these falsifications, and since then, a number of questions have surfaced regarding his federal campaign activities.<sup>5</sup> As detailed below, George Santos's disclosure reports, along with other publicly available information, shows that he and the Committee may have violated federal campaign finance laws.

### **Excessive Contributions**

Disclosure reports show that the Committee accepted a number of contributions that appear to exceed the applicable \$2,900 per election contribution limit for contributions from individuals during the 2022 election cycle. In particular, the Committee accepted a total of \$113,390 in contributions from 36 different individual contributors that appear to exceed the contribution limits.<sup>6</sup>

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<sup>2</sup> *Id.*

<sup>3</sup> See Devolder-Santos for Congress, Statement of Organization (Nov. 5, 2021), <https://docquery.fec.gov/cgi-bin/forms/C00721365/1547349/>.

<sup>4</sup> See, e.g., Grace Ashford and Michael Gold, "Who Is Rep.-Elect George Santos? His Résumé May Be Largely Fiction," N.Y. Times (December 19, 2022), <https://www.nytimes.com/2022/12/19/nyregion/george-santos-ny-republicans.html>; Julia Shapero, "Scrutiny turns to George Santos's campaign funding," The Hill, (Dec. 31, 2022), <https://thehill.com/homenews/house/3792626-scrutiny-turns-to-george-santos-campaign-funding/d>.

<sup>5</sup> 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/>.

<sup>6</sup> Exhibit A to the Complaint includes an itemized breakdown of these contributions. Due to redistricting litigation and court orders, New York's originally scheduled June 28, 2022 primary was cancelled and the primary was moved to August 23, 2022. Given that candidates were already raising funds for the June 28, 2022 primary when it was moved to August 23, the Commission issued an advisory opinion establishing a separate limit for the August 23 primary election. See Advisory Opinion 2022-08 (NRCC). Accordingly, the above excessive primary contributions identified in the chart and Exhibit take into account this third limit.

## Excessive Contributions to Devolder-Santos for Congress 2021-2022

| Name                   | Election | Excessive Amount |
|------------------------|----------|------------------|
| BACH, JOHN             | P2022    | \$1,250.00       |
| BARONE, SANDRA         | P2022    | \$2,900.00       |
| BARONE, SCOTT          | P2022    | \$2,900.00       |
| BERG, CARL             | P2022    | \$2,700.00       |
| BOICH, DARYL           | P2022    | \$700.00         |
| CASSIDY, GLORIA        | P2022    | \$2,900.00       |
| COTGREAVE, JAMES       | P2022    | \$2,900.00       |
| DEATON, TYLER          | P2022    | \$2,900.00       |
| EISEN, JOSH            | P2022    | \$5,800.00       |
| FERNANDEZ, OCTAVIO     | P2022    | \$1,100.00       |
| FISHER, KENNETH        | P2022    | \$2,900.00       |
| FISHER, SHERRILYN      | P2022    | \$2,900.00       |
| FORMAN, PETER          | P2022    | \$7,100.00       |
| FRIEDBERG, DANIEL      | P2022    | \$2,900.00       |
| GAO, CHENG             | P2022    | \$8,300.00       |
| GRACE, OLIVER          | P2022    | \$2,900.00       |
| GURNEY, SUSAN          | G2022    | \$1,000.00       |
| GURSOY, SINAN          | P2022    | \$14,500.00      |
| HILL, VERNON           | P2022    | \$2,900.00       |
| IRELAND, DEBRA         | P2022    | \$2,900.00       |
| KASHINSKY, JOSEPH      | P2022    | \$1,100.00       |
| KRAMER, GEORGE         | G2022    | \$1,000.00       |
| MANGI, SANDRA          | G2022    | \$2,900.00       |
| MARTIN, JAMES          | P2022    | \$2,800.00       |
| MEUSER FOR CONGRESS    | G2022    | \$1,000.00       |
| MILLER, BARBARA        | G2022    | \$2,900.00       |
| MILLER, MAX            | G2022    | \$2,900.00       |
| NIAMONITAKIS, MIKE     | G2022    | \$3,900.00       |
| NIAMONITAKIS, MIKE     | P2022    | \$2,900.00       |
| PENSABENE, RAYMOND     | G2022    | \$2,900.00       |
| QUENTZEL, JILL         | P2022    | \$3,400.00       |
| REISS, CLAIRE          | G2022    | \$100.00         |
| TAYLOR, CHRISTOPHER P. | G2022    | \$3,800.00       |
| TAYLOR, CHRISTOPHER P. | P2022    | \$7,100.00       |
| ZERVOS, JOANNE         | G2022    | \$100.00         |
| ZERVOS, JOANNE         | P2022    | \$240.00         |
| Total:                 |          | \$113,390.00     |

Disclosure reports show that as of November 28, 2022, the Committee has not refunded, redesignated, or reattributed these excessive contributions.

### Business Expenses

In addition, the Committee's disclosure reports and other publicly available information indicate that Respondents may have used campaign funds to pay for expenses associated with George Santos's personal business affairs. State records show that George Santos formed the

Devolder Organization LLC (the "Company") on May 11, 2021,<sup>7</sup> less than a month after he declared his federal candidacy. He listed the Company's principal address as 336 N. Babcock St. 104, Melbourne, Florida 32935.<sup>8</sup> Approximately three weeks after forming the Company, on May 31, 2022, the Committee made a \$358.86 payment to a hotel located two miles from the Company's registered address.<sup>9</sup> The Committee made a second payment of \$492 to the same hotel in July 2021.<sup>10</sup> These payments are reflected below.

|                     |  |            |            |        |
|---------------------|--|------------|------------|--------|
| HILTON<br>MELBOURNE | 200 RIALTO<br>PLACE<br>MELBOURNE,<br>Florida 32901 | 05/31/2021 | HOTEL      | 358.86 |
| HILTON<br>MELBOURNE | 200 RIALTO<br>PLACE<br>MELBOURNE,<br>Florida 32901 | 07/22/2021 | HOTEL STAY | 492.42 |

At the time of these payments, there is no evidence in the public domain that Santos was conducting any campaign activities, such as fundraising events. Likewise, disclosure reports do not show any contributors to Santos's campaign from the Melbourne area.<sup>11</sup> Moreover, the Committee also paid for airfare for Mr. Santos around the same dates it paid for the above

<sup>7</sup> See Florida Division of Corporations, Devolder Organization LLC, <http://search.sunbiz.org/Inquiry/CorporationSearch/SearchResultDetail?inquirytype=EntityName&directionType=Initial&searchNameOrder=DEVOLDERORGANIZATION%20L210002061500&aggregateId=flal-l21000206150-d2719327-f0cc-424e-8b6c-04026a110c67&searchTerm=DEVOLDER&listNameOrder=DEVOLDERLAWFIRM%20L160001128740>.

<sup>8</sup> See *id.*, Devolder Organization LLC Articles of Incorporation, <http://search.sunbiz.org/Inquiry/CorporationSearch/ConvertTiffToPDF?storagePath=COR%5C2021%5C0601%5C0184778.Tif&documentNumber=L21000206150>.

<sup>9</sup> Devolder-Santos for Congress, 2021 Sixth Amended July Quarterly Report at 90, (September 12, 2022), <https://docquery.fec.gov/pdf/698/202209129528389698/202209129528389698.pdf>.

<sup>10</sup> Devolder-Santos for Congress, 2021 Sixth Amended October Quarterly Report at 119, (September 12, 2022), <https://docquery.fec.gov/pdf/987/202209129528389987/202209129528389987.pdf>.

<sup>11</sup> See Devolder for Congress, Disbursements, 2021-2022, [https://www.fec.gov/data/disbursements/?committee\\_id=C00721365&two\\_year\\_transaction\\_period=2022&data\\_type=processed](https://www.fec.gov/data/disbursements/?committee_id=C00721365&two_year_transaction_period=2022&data_type=processed).

expenses.<sup>12</sup> We urge the Commission to launch an investigation to determine the purpose of these suspect expenses and whether they are related to any campaign activity.<sup>13</sup>

### **Rental Payments**

The Committee also disclosed payments to a cleaning company called Cleaner 123 Inc. for “apartment rental for staff” and “rent.”<sup>14</sup> The address listed on the Committee’s disclosure report for these expenses is 123 Juniper Place, Huntington, NY 11743.<sup>15</sup> According to reporting by the *New York Times*, the address appears to be a home in Long Island and one neighbor claimed that George Santos had been living in the home for months.<sup>16</sup> Two other neighbors, the article reports, “had seen Mr. Santos and [his partner] coming and going[.]”<sup>17</sup> As the below chart demonstrates, the Committee made a total of \$10,900 in payments to Cleaner 123 Inc. from June to September 2022.<sup>18</sup>

| 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 |

<sup>12</sup> See Devolder for Congress, Disbursements, 2021-2022,

[https://www.fec.gov/data/disbursements/?data\\_type=processed&committee\\_id=C00721365&two\\_year\\_transaction\\_period=2022&disbursement\\_description=air](https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00721365&two_year_transaction_period=2022&disbursement_description=air) (showing airfare disbursements on the following dates: May 20, 2021, June 2-3, 2021, July 20-24, 2021).

<sup>13</sup> For instance, the Committee’s disclosure reports also show a number of other questionable expenses involving luxury hotels, food and beverage, and parking expenses in Florida during the 2020 election cycle. See Devolder for Congress, Disbursements, 2021-2022,

[https://www.fec.gov/data/disbursements/?data\\_type=processed&committee\\_id=C00721365&two\\_year\\_transaction\\_period=2022](https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00721365&two_year_transaction_period=2022).

<sup>14</sup> See Devolder-Santos for Congress, Disbursements 2021-2022,

[https://www.fec.gov/data/disbursements/?data\\_type=processed&committee\\_id=C00721365&recipient\\_name=cleaner+123](https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00721365&recipient_name=cleaner+123).

<sup>15</sup> See Devolder-Santos for Congress, Disbursements 2021-2022,

[https://www.fec.gov/data/disbursements/?data\\_type=processed&committee\\_id=C00721365&recipient\\_name=Cleaner+123&two\\_year\\_transaction\\_period=2022](https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00721365&recipient_name=Cleaner+123&two_year_transaction_period=2022)

<sup>16</sup> 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>.

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

<sup>18</sup> See Devolder-Santos for Congress, Disbursements 2021-2022,

[https://www.fec.gov/data/disbursements/?data\\_type=processed&committee\\_id=C00721365&recipient\\_name=cleaner+123](https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00721365&recipient_name=cleaner+123).

|            |                  |                            |                 |
|------------|------------------|----------------------------|-----------------|
| 08/04/2022 | Cleaner 123 Inc. | Apartment Rental for Staff | \$2,800.00      |
| 09/06/2022 | Cleaner 123 Inc. | Apartment Rental for Staff | \$3,500.00      |
|            |                  | <b>Total</b>               | <b>\$10,900</b> |

## LEGAL DISCUSSION

### 1. Respondents Accepted Excessive Contributions

The Act and Commission regulations limit the amount an individual may contribute to a candidate's authorized committee and likewise prohibits any candidate or committee from knowingly accepting an excessive contribution.<sup>19</sup> During the 2022 election cycle, an authorized committee could only accept \$2,900 per election from an individual contributor.<sup>20</sup> A primary election and a general election are considered separate elections, and thus the individual contribution limits apply separately to each election.<sup>21</sup> When a committee receives a contribution that exceeds the contributor's limit for an election, the committee must refund the excessive contribution or seek redesignation or reattribution of the contribution within 60 days of receipt.<sup>22</sup> If the committee does not remedy the excessive contribution by taking one of these actions, it will be liable for accepting an excessive contribution.

In clear violation of these provisions, the Committee accepted a total of \$113,390 in contributions from 36 different individual contributors that exceeded the \$2,900 per election contribution limit. As the above chart demonstrates, the Committee received contributions from 25 contributors that exceeded \$5,800 for New York's primary election.<sup>23</sup> The Committee

<sup>19</sup> 52 U.S.C. §§ 30116(a)(1)(A), 30116(f); *see also* 11 C.F.R. §§ 110.1(b), 110.9.

<sup>20</sup> 52 U.S.C. § 30116(a)(1); 11 C.F.R. § 110.1(b); Price Index Adjustments for Contribution and Expenditure Limitations and Lobbyist Bundling Disclosure Threshold, 86 Fed. Reg. 7,867, 7869 (Feb. 2, 2021).

<sup>21</sup> 52 U.S.C. §§ 30101(l)(A), 30116(a)(6); 11 C.F.R. §§ 100.2(b)-(c), 110.1(j).

<sup>22</sup> *See* 11 C.F.R. § 110.1(b).

<sup>23</sup> As previously noted, candidates running for the U.S. House of Representatives were permitted to raise funds under two primary election limits—one for the June 28, 2022 primary election that was cancelled and another for the August 23 primary election—for a combined total of \$5,800. Advisory Opinion 2022-08 (NRCC).

astonishingly accepted \$14,500 in primary contributions from one individual. Further, the Committee received contributions from 11 individuals designated for the general election that exceeded the \$2,900 general election limit. To date, the Committee has not remedied these excessive contributions by redesignating, reattributing, or refunding them. Accordingly, there is reason to believe that Respondents violated 52 U.S.C. § 30116(f) and 11 C.F.R. §§ 103(b)(3), 110.9 by accepting excessive contributions.

## **2. Respondents Converted Campaign Funds to Personal Use**

The Act prohibits individuals, including candidates, from converting campaign funds to personal use.<sup>24</sup> Commission regulations define personal use as “any use of funds in a campaign account 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.”<sup>25</sup> 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.”<sup>26</sup> For other expenses, such as disbursements for travel and meals, the Commission will determine on a case-by-case basis whether the expenses is a prohibited personal use applying the “irrespective test” set out in the Commission regulations.<sup>27</sup>

The available information provides reason to believe that Respondents may have converted campaign funds to personal use. First, George Santos may have used campaign funds for expenses associated with his business activities. As noted above, the Committee disclosed a payment on

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<sup>24</sup> 52 U.S.C. § 30114(a)(6), (b)(1); see 11 C.F.R. § 113.2(g).

<sup>25</sup> 52 U.S.C. § 30114(b)(2); see 11 C.F.R. § 113.1(g).

<sup>26</sup> 52 U.S.C. § 30114(b)(2)(A); see 11 C.F.R. § 113.1(g)(1)(i)(E).

<sup>27</sup> 11 C.F.R. § 113.1(g)(1)(ii); see also FEC, Personal Use, <https://www.fec.gov/help-candidates-and-committees/making-disbursements/personal-use/> (last visited January 11, 2023).

May 31, 2021, to a hotel that is less than two miles from where Devolder Organization is located.<sup>28</sup> Notably, George Santos formed the Devolder Organization that very same month.<sup>29</sup> The Committee also reported a second disbursement to this same hotel in July 2021.<sup>30</sup>

The Committee's disclosure reports do not show any contributions from any contributors in the Melbourne, Florida area during these time periods. Nor is there any evidence that George Santos was conducting any campaign-related activities in that area at those times. Based on the timing of these transactions, the proximity to his personal business, and the lack of any documented campaign activity in the public domain, the more plausible conclusion is that George Santos used campaign funds while conducting business activities.

Second, there is evidence that George Santos used campaign funds to pay rent for a property that he and his partner used as their personal residence. As mentioned above, the Committee reported five disbursements totaling \$10,900 for rent-related expenses.<sup>31</sup> Although the Committee disclosed that three of the disbursements were for staff housing, a neighbor reportedly told that *New York Times* that George Santos "had been living there for months" and two others reportedly observed him and his partner "coming and going."<sup>32</sup> Thus, there is reason to doubt the accuracy of the Committee's these descriptions in its reports.

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<sup>28</sup> Devolder-Santos for Congress, 2021 Sixth Amended July Quarterly Report at 90, (September 12, 2022), <https://docquery.fec.gov/pdf/698/202209129528389698/202209129528389698.pdf>.

<sup>29</sup> See Florida Division of Corporations, Devolder Organization LLC, [http://search.sunbiz.org/Inquiry/CorporationSearch/SearchResultDetail?inquirytype=EntityName&directionType=Initial&searchNameOrder=DEVOLDERORGANIZATION%20L210002061500&aggregateId=flal-l21000206150-d2719327-f0cc-424e-8b6c-](http://search.sunbiz.org/Inquiry/CorporationSearch/SearchResultDetail?inquirytype=EntityName&directionType=Initial&searchNameOrder=DEVOLDERORGANIZATION%20L210002061500&aggregateId=flal-l21000206150-d2719327-f0cc-424e-8b6c-04026a110c67&searchTerm=DEVOLDER&listNameOrder=DEVOLDERLAWFIRM%20L160001128740)

[04026a110c67&searchTerm=DEVOLDER&listNameOrder=DEVOLDERLAWFIRM%20L160001128740](http://search.sunbiz.org/Inquiry/CorporationSearch/SearchResultDetail?inquirytype=EntityName&directionType=Initial&searchNameOrder=DEVOLDERORGANIZATION%20L210002061500&aggregateId=flal-l21000206150-d2719327-f0cc-424e-8b6c-04026a110c67&searchTerm=DEVOLDER&listNameOrder=DEVOLDERLAWFIRM%20L160001128740)

<sup>30</sup> Devolder-Santos for Congress, 2021 Sixth Amended October Quarterly Report at 119, (September 12, 2022), <https://docquery.fec.gov/pdf/987/202209129528389987/202209129528389987.pdf>.

<sup>31</sup> Devolder-Santos for Congress, [https://www.fec.gov/data/disbursements/?data\\_type=processed&committee\\_id=C00721365&recipient\\_name=cleaner+123](https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00721365&recipient_name=cleaner+123).

<sup>32</sup> 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>.

Taken together, the available information is sufficient to satisfy the reason to believe threshold that applies at this stage. As the Commission's policy statement makes clear, the "Commission shall make an investigation" where there is reason to believe that a person committed a violation of the Act.<sup>33</sup> A "reason to believe" finding does not mean that a respondent has committed a violation of the Act. Rather, it simply means that 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.<sup>34</sup>

This is precisely the case here. If the above allegations are true, they would amount to significant violations of federal campaign finance law, warranting the full use of the Commission's resources. George Santos has fabricated nearly all aspects of his background and there are serious questions about his business dealings and finances. Given the extraordinary nature of George Santos's past falsehoods and the credible questions regarding his campaign spending identified above, the Commission should thoroughly investigate these allegations to determine whether any campaign funds were converted to personal use. Accordingly, the Commission should find reason to believe that Respondents violated 52 U.S.C. § 30114(b) by converting campaign funds to personal use.

### **3. 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.<sup>35</sup> The principal campaign committee must file a Statement of Organization within 10

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<sup>33</sup> 52 U.S.C. § 30109(a)(2); *see also* 11 C.F.R. § 111.4(a); Statement of Policy Regarding Commission Action in Matters at the Initial Stage in the Enforcement Process, 72 Fed. Reg. 12,545 (Mar. 16, 2007).

<sup>34</sup> *Id.*

<sup>35</sup> 52 U.S.C. § 30101(2); 11 C.F.R. § 100.3(a)(1).

days of its designation,<sup>36</sup> and is responsible for filing regular disclosure reports with the Commission.

George Santos filed his Statement of Candidacy on April 17, 2021.<sup>37</sup> The Committee was thus required to file its Statement of Organization no later than April 27, 2021, yet nearly seven months went by before the Committee filed this statement on November 5, 2021.<sup>38</sup> Accordingly, there is reason to believe that Respondents violated 52 U.S.C. § 30103(a) by failing to timely file the required Statement of Organization.

#### REQUESTED ACTION

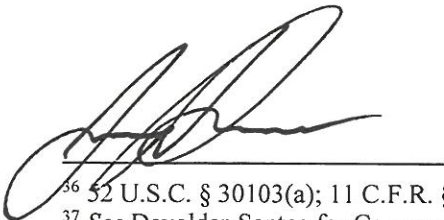
We respectfully request that the Commission immediately investigate these allegations, seek any and all appropriate sanctions, and enjoin Respondents from further violations of the law.

Sincerely,



Kyle Herrig, President  
Accountable.US  
1919 M Street NW, Suite 450  
Washington, DC 20036

SUBSCRIBED AND SWORN to before me this 13 day of January 2023.



<sup>36</sup> 52 U.S.C. § 30103(a); 11 C.F.R. § 102.1 (a).

<sup>37</sup> See Devolder-Santos for Congress, Statement of Candidacy (April 17, 2021), <https://docquery.fec.gov/pdf/781/202104179443792781/202104179443792781.pdf>.

<sup>38</sup> 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/>.



Notary Public



My Commission Expires: 12/14/23

**EXHIBIT A**

| <b>Name</b>                       | <b>Amount</b> | <b>Election</b> | <b>Date</b> | <b>Excessive Amount</b> |
|-----------------------------------|---------------|-----------------|-------------|-------------------------|
| GAO, CHENG                        | 5600          | P2022           | 1/31/2021   | \$2,700.00              |
| TAYLOR, CHRISTOPHER P.            | 1200          | P2022           | 2/2/2021    |                         |
| YOUNG-TAYLOR, KENNETH CHRISTOPHER | -1200         | P2022           | 2/2/2021    |                         |
| YOUNG-TAYLOR, KENNETH CHRISTOPHER | 2000          | P2022           | 2/11/2021   |                         |
| BERG, CARL                        | 2800          | P2022           | 2/27/2021   |                         |
| BERG, CARL                        | 2800          | P2022           | 2/27/2021   | \$2,700.00              |
| COLLINS III, HENRY L.             | 1000          | P2022           | 2/27/2021   |                         |
| GAO, CHENG                        | 5600          | P2022           | 2/27/2021   | \$5,600.00              |
| MARTIN, JAMES                     | 2800          | P2022           | 2/27/2021   |                         |
| ZERVOS, JOANNE                    | 1000          | P2022           | 3/5/2021    |                         |
| EISEN, JOSH                       | 2900          | P2022           | 3/23/2021   |                         |
| REISS, CLAIRE                     | 1000          | P2022           | 3/23/2021   |                         |
| COLLINS III, HENRY L.             | 1000          | P2022           | 3/30/2021   |                         |
| REISS, CLAIRE                     | 1000          | P2022           | 3/31/2021   |                         |
| ZERVOS, JOANNE                    | 1000          | P2022           | 4/5/2021    |                         |
| RIPAK, LAWRENCE                   | 1000          | P2022           | 4/20/2021   |                         |
| REISS, CLAIRE                     | 1000          | P2022           | 5/14/2021   |                         |
| REISS, CLAIRE                     | -100          | P2022           | 5/21/2021   |                         |
| REISS, CLAIRE                     | 100           | G2022           | 5/21/2021   | \$100.00                |
| REISS, CLAIRE                     | 2900          | G2022           | 5/24/2021   |                         |
| COLLINS III, HENRY L.             | 2900          | P2022           | 6/1/2021    |                         |
| ZERVOS, JOANNE                    | 750           | P2022           | 6/4/2021    |                         |
| SILVA, CARLOS                     | 2500          | P2022           | 6/8/2021    |                         |
| TAYLOR, CHRISTOPHER P.            | 1500          | P2022           | 6/18/2021   |                         |
| YOUNG-TAYLOR, KENNETH CHRISTOPHER | 1500          | P2022           | 6/18/2021   |                         |
| ZERVOS, JOANNE                    | 250           | P2022           | 6/21/2021   |                         |
| ZERVOS, JOANNE                    | -100          | P2022           | 6/22/2021   |                         |
| ZERVOS, JOANNE                    | 100           | G2022           | 6/22/2021   |                         |
| MARTIN, JAMES                     | 2900          | P2022           | 6/24/2021   | \$2,800.00              |

|                                   |       |       |            |              |
|-----------------------------------|-------|-------|------------|--------------|
| YOUNG-TAYLOR, KENNETH CHRISTOPHER | 900   | P2022 | 6/25/2021  |              |
| YOUNG-TAYLOR, KENNETH CHRISTOPHER | 600   | P2022 | 6/25/2021  |              |
| COTGREAVE, JAMES                  | 1000  | P2022 | 6/28/2021  |              |
| ISAAC, PAUL                       | 1000  | P2022 | 6/30/2021  |              |
| ZERVOS, JOANNE                    | 1500  | G2022 | 6/30/2021  |              |
| ZERVOS, JOANNE                    | 100   | G2022 | 6/30/2021  |              |
| NIAMONITAKIS, MIKE                | 2900  | P2022 | 7/8/2021   |              |
| REISS, CLAIRE                     | 2900  | P2022 | 7/16/2021  |              |
| REISS, CLAIRE                     | 2900  | P2022 | 7/16/2021  |              |
| REISS, CLAIRE                     | -2900 | P2022 | 7/16/2021  |              |
| REISS, CLAIRE                     | -2900 | P2022 | 7/16/2021  | Refunded     |
| DUMEZICH, DAN                     | 1000  | P2022 | 7/27/2021  |              |
| WIKERT, JAMES                     | 1500  | P2022 | 8/9/2021   |              |
| KRAMER, GEORGE                    | 1500  | P2022 | 9/7/2021   |              |
| COLLINS III, HENRY L.             | -2900 | P2022 | 9/12/2021  | Refunded     |
| BLANFORD, LAWRENCE                | 1000  | P2022 | 9/24/2021  |              |
| EISEN, JOSH                       | 2900  | G2022 | 9/27/2021  |              |
| YOUNG-TAYLOR, KENNETH CHRISTOPHER | 1500  | P2022 | 9/27/2021  |              |
| BLANFORD, LAWRENCE                | 1000  | P2022 | 9/28/2021  |              |
| KRAMER, GEORGE                    | 2900  | P2022 | 9/30/2021  |              |
| KRAMER, GEORGE                    | -1500 | P2022 | 9/30/2021  |              |
| KRAMER, GEORGE                    | 2100  | G2022 | 9/30/2021  |              |
| KRAMER, GEORGE                    | 1500  | G2022 | 9/30/2021  |              |
| KRAMER, GEORGE                    | -700  | G2022 | 9/30/2021  |              |
| YOUNG-TAYLOR, KENNETH CHRISTOPHER | -1000 | P2022 | 9/30/2021  |              |
| YOUNG-TAYLOR, KENNETH CHRISTOPHER | 1000  | G2022 | 9/30/2021  |              |
| ZERVOS, JOANNE                    | 1000  | G2022 | 9/30/2021  |              |
| BLANFORD, LAWRENCE                | 1000  | P2022 | 10/1/2021  |              |
| BLANFORD, LAWRENCE                | 1000  | G2022 | 10/4/2021  |              |
| GIACHETTI, FREDERICK J.           | 475   | P2022 | 10/4/2021  | Refunded     |
| GIACHETTI, FREDERICK J.           | 2425  | G2022 | 10/4/2021  |              |
| BLANFORD, LAWRENCE                | -100  | P2022 | 10/5/2021  | Refunded     |
| BLANFORD, LAWRENCE                | 100   | G2022 | 10/5/2021  |              |
| RIPAK, LAWRENCE                   | 1900  | P2022 | 10/15/2021 |              |
| QUENTZEL, JILL                    | 500   | P2022 | 10/18/2021 | \$500.00     |
| NIAMONITAKIS, MIKE                | 2900  | G2022 | 10/20/2021 |              |
| MALLET, CHESTER                   | 5000  | P2022 | 10/22/2021 |              |
| MALLET, CHESTER                   | -2100 | P2022 | 10/26/2021 | Redesignated |
| MALLET, CHESTER                   | 2100  | G2022 | 10/26/2021 |              |
| ZERVOS, JOANNE                    | 230   | G2022 | 11/9/2021  |              |

|                                      |       |       |            |              |
|--------------------------------------|-------|-------|------------|--------------|
| WIKERT, JAMES                        | 2900  | P2022 | 11/16/2021 |              |
| WIKERT, JAMES                        | -1500 | P2022 | 11/18/2021 | Refunded     |
| WIKERT, JAMES                        | 1500  | G2022 | 11/18/2021 |              |
| RASTIN, TOM                          | 5000  | P2022 | 11/28/2021 |              |
| RASTIN, TOM                          | -2100 | P2022 | 12/1/2021  |              |
| RASTIN, TOM                          | 2100  | G2022 | 12/1/2021  |              |
| BLANFORD, LAWRENCE                   | 1500  | G2022 | 12/10/2021 | Redesignated |
| DUMEZICH, DAN                        | 1000  | P2022 | 12/10/2021 |              |
| YOUNG-TAYLOR, KENNETH<br>CHRISTOPHER | 2000  | P2022 | 12/15/2021 |              |
| RIPAK, LAWRENCE                      | 250   | P2022 | 12/16/2021 |              |
| RIPAK, LAWRENCE                      | -250  | P2022 | 12/20/2021 |              |
| RIPAK, LAWRENCE                      | 250   | G2022 | 12/20/2021 |              |
| WIKERT, JAMES                        | 600   | G2022 | 12/31/2021 |              |
| YOUNG-TAYLOR, KENNETH<br>CHRISTOPHER | 2000  | P2022 | 12/31/2021 |              |
| YOUNG-TAYLOR, KENNETH<br>CHRISTOPHER | -1900 | P2022 | 1/3/2022   |              |
| YOUNG-TAYLOR, KENNETH<br>CHRISTOPHER | 1900  | G2022 | 1/3/2022   |              |
| DUMEZICH, DAN                        | 1000  | P2022 | 1/24/2022  |              |
| DUMEZICH, DAN                        | -100  | P2022 | 1/25/2022  | Redesignated |
| DUMEZICH, DAN                        | 100   | G2022 | 1/25/2022  |              |
| RIPAK, LAWRENCE                      | 100   | P2022 | 1/26/2022  |              |
| RIPAK, LAWRENCE                      | -100  | P2022 | 1/28/2022  |              |
| RIPAK, LAWRENCE                      | 100   | G2022 | 1/28/2022  |              |
| MILLER, MAX                          | 2900  | P2022 | 2/8/2022   |              |
| MILLER, MAX                          | 2900  | G2022 | 2/8/2022   |              |
| GURSOY, SINAN                        | 2900  | P2022 | 2/22/2022  |              |
| ISAAC, PAUL                          | 1000  | P2022 | 3/5/2022   |              |
| COTGREAVE, JAMES                     | 1000  | P2022 | 3/24/2022  |              |
| QUENTZEL, JILL                       | 2900  | P2022 | 3/24/2022  |              |
| QUENTZEL, JILL                       | 2900  | P2022 | 3/24/2022  | \$2,900.00   |
| QUENTZEL, JILL                       | 2900  | G2022 | 3/24/2022  |              |
| TAYLOR, CHRISTOPHER P.               | 2900  | P2022 | 3/24/2022  | \$6,400.00   |
| TAYLOR, CHRISTOPHER P.               | -2700 | P2022 | 3/24/2022  |              |
| TAYLOR, CHRISTOPHER P.               | 2700  | G2022 | 3/24/2022  |              |
| TAYLOR, CHRISTOPHER P.               | 900   | G2022 | 3/24/2022  |              |
| TAYLOR, CHRISTOPHER P.               | 900   | G2022 | 3/24/2022  |              |
| BARRETT, RACHEL                      | 5800  | P2022 | 3/30/2022  |              |
| BARRETT, RACHEL                      | -2900 | P2022 | 3/30/2022  | Redesignated |
| BARRETT, RACHEL                      | 2900  | G2022 | 3/30/2022  |              |
| GURSOY, SINAN                        | 5800  | P2022 | 3/30/2022  | \$5,800.00   |
| MILLER, BARBARA                      | 5800  | P2022 | 3/30/2022  |              |
| RIPAK, LAWRENCE                      | 250   | P2022 | 3/30/2022  |              |

|                    |       |       |           |              |
|--------------------|-------|-------|-----------|--------------|
| BACH, JOHN         | 2900  | P2022 | 3/31/2022 |              |
| BACH, JOHN         | 2900  | G2022 | 3/31/2022 |              |
| GURSOY, SINAN      | 5800  | P2022 | 3/31/2022 | \$5,800.00   |
| ISAAC, PAUL        | 1000  | P2022 | 3/31/2022 |              |
| ISAAC, PAUL        | -100  | P2022 | 3/31/2022 | Redesignated |
| ISAAC, PAUL        | 100   | G2022 | 3/31/2022 |              |
| MANGI, SANDRA      | 2900  | P2022 | 3/31/2022 |              |
| MANGI, SANDRA      | 2900  | G2022 | 3/31/2022 |              |
| MILLER, BARBARA    | -2900 | P2022 | 3/31/2022 |              |
| MILLER, BARBARA    | 2900  | G2022 | 3/31/2022 |              |
| RIPAK, LAWRENCE    | -250  | P2022 | 3/31/2022 | Refunded     |
| RIPAK, LAWRENCE    | 250   | G2022 | 3/31/2022 |              |
| ZERVOS, JOANNE     | 25    | P2022 | 4/8/2022  |              |
| ZERVOS, JOANNE     | 25    | P2022 | 4/12/2022 |              |
| ZERVOS, JOANNE     | 35    | P2022 | 4/17/2022 |              |
| NIAMONITAKIS, MIKE | 2900  | P2022 | 4/20/2022 | \$2,900.00   |
| ZERVOS, JOANNE     | 35    | P2022 | 4/20/2022 |              |
| BOICH, DARYL       | 1000  | P2022 | 4/28/2022 |              |
| ZERVOS, JOANNE     | 25    | P2022 | 5/8/2022  |              |
| ZERVOS, JOANNE     | 25    | P2022 | 5/12/2022 |              |
| BARONE, SCOTT      | 1000  | P2022 | 5/16/2022 |              |
| ZERVOS, JOANNE     | 35    | P2022 | 5/17/2022 |              |
| ZERVOS, JOANNE     | 35    | P2022 | 5/19/2022 | \$240.00     |
| FISHER, KENNETH    | 2900  | P2022 | 5/20/2022 |              |
| FISHER, KENNETH    | 2900  | P2022 | 5/20/2022 | \$2,900.00   |
| FISHER, SHERRILYN  | 2900  | P2022 | 5/20/2022 |              |
| FISHER, SHERRILYN  | 2900  | P2022 | 5/20/2022 | \$2,900.00   |
| GURNEY, SUSAN      | 2000  | P2022 | 5/20/2022 |              |
| BOICH, DARYL       | 1000  | P2022 | 5/22/2022 |              |
| GRACE, OLIVER      | 2900  | P2022 | 5/28/2022 |              |
| GRACE, OLIVER      | 2900  | P2022 | 5/28/2022 | \$2,900.00   |
| RIPAK, LAWRENCE    | 1000  | P2022 | 6/6/2022  |              |
| ZERVOS, JOANNE     | 25    | P2022 | 6/8/2022  |              |
| IRELAND, DEBRA     | 2900  | P2022 | 6/10/2022 |              |
| IRELAND, DEBRA     | 2900  | P2022 | 6/10/2022 | \$2,900.00   |
| ZERVOS, JOANNE     | 25    | P2022 | 6/15/2022 |              |
| ZERVOS, JOANNE     | 35    | P2022 | 6/17/2022 |              |
| ZERVOS, JOANNE     | 35    | P2022 | 6/22/2022 |              |
| DEATON, TYLER      | 2900  | P2022 | 6/27/2022 |              |
| ISAAC, PAUL        | 500   | G2022 | 6/27/2022 |              |
| FRIEDBERG, DANIEL  | 2900  | P2022 | 6/28/2022 |              |
| FRIEDBERG, DANIEL  | 2900  | P2022 | 6/28/2022 | \$2,900.00   |
| BACH, JOHN         | 750   | P2022 | 6/30/2022 | \$750.00     |

|                        |       |       |           |            |
|------------------------|-------|-------|-----------|------------|
| BOICH, DARYL           | 1500  | P2022 | 6/30/2022 |            |
| BOICH, DARYL           | 600   | P2022 | 6/30/2022 | \$600.00   |
| BOICH, DARYL           | 400   | P2022 | 6/30/2022 |            |
| CASSIDY, GLORIA        | 2900  | P2022 | 6/30/2022 | \$2,900.00 |
| CASSIDY, GLORIA        | 2900  | P2022 | 6/30/2022 |            |
| COTGREAVE, JAMES       | 2900  | P2022 | 6/30/2022 |            |
| COTGREAVE, JAMES       | 1900  | P2022 | 6/30/2022 | \$1,900.00 |
| COTGREAVE, JAMES       | 1000  | P2022 | 6/30/2022 | \$1,000.00 |
| DEATON, TYLER          | 2900  | P2022 | 6/30/2022 | \$2,900.00 |
| FERNANDEZ, OCTAVIO     | 2900  | P2022 | 6/30/2022 |            |
| FERNANDEZ, OCTAVIO     | 1100  | P2022 | 6/30/2022 | \$1,100.00 |
| HILL, VERNON           | 2900  | P2022 | 6/30/2022 |            |
| HILL, VERNON           | 2900  | P2022 | 6/30/2022 | \$2,900.00 |
| HILL, VERNON           | 800   | G2022 | 6/30/2022 |            |
| ZERVOS, JOANNE         | 35    | P2022 | 7/17/2022 |            |
| ZERVOS, JOANNE         | 35    | P2022 | 7/17/2022 |            |
| KRAMER, GEORGE         | 2900  | P2022 | 7/22/2022 |            |
| KASHINSKY, JOSEPH      | 2000  | P2022 | 8/2/2022  |            |
| BACH, JOHN             | 2900  | P2022 | 8/3/2022  |            |
| EISEN, JOSH            | 2900  | P2022 | 8/4/2022  |            |
| GURSOY, SINAN          | 2900  | P2022 | 8/5/2022  |            |
| GURSOY, SINAN          | 2900  | G2022 | 8/5/2022  |            |
| QUENTZEL, JILL         | 525   | P2022 | 8/5/2022  |            |
| QUENTZEL, JILL         | -525  | P2022 | 8/5/2022  |            |
| TAYLOR, CHRISTOPHER P. | 700   | P2022 | 8/5/2022  | \$700.00   |
| KASHINSKY, JOSEPH      | 2000  | P2022 | 8/10/2022 | \$1,100.00 |
| MANGI, SANDRA          | 2900  | P2022 | 8/10/2022 |            |
| MANGI, SANDRA          | 2900  | G2022 | 8/10/2022 | \$2,900.00 |
| BOICH, DARYL           | 100   | P2022 | 8/15/2022 | \$100.00   |
| FORMAN, PETER          | 10000 | P2022 | 8/15/2022 | \$7,100.00 |
| ZERVOS, JOANNE         | 35    | P2022 | 8/17/2022 |            |
| FISHER, KENNETH        | 2900  | G2022 | 8/18/2022 |            |
| FISHER, SHERRILYN      | 2900  | G2022 | 8/18/2022 |            |
| BACH, JOHN             | 500   | P2022 | 8/19/2022 | \$500.00   |
| ZERVOS, JOANNE         | 35    | P2022 | 8/19/2022 |            |
| ZERVOS, JOANNE         | 35    | P2022 | 8/19/2022 |            |
| ZERVOS, JOANNE         | 35    | P2022 | 8/19/2022 |            |
| ZERVOS, JOANNE         | 35    | P2022 | 8/19/2022 |            |
| ZERVOS, JOANNE         | 35    | P2022 | 8/19/2022 |            |
| ZERVOS, JOANNE         | 25    | P2022 | 8/19/2022 |            |
| ZERVOS, JOANNE         | 25    | P2022 | 8/19/2022 |            |
| ZERVOS, JOANNE         | 25    | P2022 | 8/19/2022 |            |
| ZERVOS, JOANNE         | -25   | P2022 | 8/19/2022 |            |

|                        |      |       |            |            |
|------------------------|------|-------|------------|------------|
| ZERVOS, JOANNE         | -25  | P2022 | 8/19/2022  |            |
| ZERVOS, JOANNE         | -25  | P2022 | 8/19/2022  |            |
| ZERVOS, JOANNE         | -35  | P2022 | 8/19/2022  |            |
| ZERVOS, JOANNE         | -35  | P2022 | 8/19/2022  |            |
| ZERVOS, JOANNE         | -35  | P2022 | 8/19/2022  |            |
| ZERVOS, JOANNE         | -35  | P2022 | 8/19/2022  |            |
| ZERVOS, JOANNE         | -35  | P2022 | 8/19/2022  |            |
| BARONE, SANDRA         | 2900 | P2022 | 8/20/2022  |            |
| BARONE, SANDRA         | 2900 | P2022 | 8/20/2022  | \$2,900.00 |
| BARONE, SCOTT          | 2900 | P2022 | 8/20/2022  |            |
| BARONE, SCOTT          | 2900 | P2022 | 8/20/2022  | \$2,900.00 |
| GURSOY, SINAN          | 2900 | P2022 | 8/20/2022  | \$2,900.00 |
| TAYLOR, CHRISTOPHER P. | 2900 | P2022 | 8/20/2022  |            |
| EISEN, JOSH            | 5800 | P2022 | 8/22/2022  | \$5,800.00 |
| NIAMONITAKIS, MIKE     | 1000 | G2022 | 8/24/2022  | \$1,000.00 |
| TAYLOR, CHRISTOPHER P. | -700 | G2022 | 8/26/2022  | \$3,800.00 |
| ZERVOS, JOANNE         | 35   | G2022 | 9/17/2022  |            |
| GURNEY, SUSAN          | 2900 | G2022 | 9/19/2022  |            |
| BARONE, SCOTT          | 500  | G2022 | 9/22/2022  |            |
| PENSABENE, RAYMOND     | 2900 | G2022 | 9/26/2022  |            |
| MILLER, BARBARA        | 2900 | G2022 | 9/28/2022  | \$2,900.00 |
| MILLER, MAX            | 2900 | G2022 | 9/28/2022  | \$2,900.00 |
| NIAMONITAKIS, MIKE     | 2900 | G2022 | 9/30/2022  | \$2,900.00 |
| COTGREAVE, JAMES       | 500  | G2022 | 10/2/2022  |            |
| BOICH, DARYL           | 2200 | G2022 | 10/11/2022 |            |
| RIPAK, LAWRENCE        | 250  | G2022 | 10/11/2022 |            |
| ZERVOS, JOANNE         | 35   | G2022 | 10/17/2022 | \$100.00   |
| PENSABENE, RAYMOND     | 1500 | G2022 | 10/24/2022 | \$1,500.00 |
| PENSABENE, RAYMOND     | 1400 | G2022 | 10/25/2022 | \$1,400.00 |
| GURNEY, SUSAN          | 1000 | G2022 | 10/28/2022 | \$1,000.00 |
| KRAMER, GEORGE         | 1000 | G2022 | 10/28/2022 | \$1,000.00 |
| MEUSER FOR CONGRESS    | 1000 | G2022 | 11/7/2022  |            |
| MEUSER FOR CONGRESS    | 2000 | G2022 | 11/11/2022 | \$1,000.00 |