

FEDERAL ELECTION COMMISSION

In the matter of:

Devolder-Santos for Congress  
Devolder Santos Victory Committee  
GADS PAC  
Devolder Santos for Congress Recount  
Unknown Respondents

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COMPLAINT

1. Citizens for Responsibility and Ethics in Washington (“CREW”) brings this complaint before the Federal Election Commission (“FEC” or “Commission”) seeking an immediate investigation and enforcement action against Devolder-Santos for Congress, Devolder Santos Victory Committee, GADS PAC, Devolder Santos for Congress Recount, and Unknown Respondents for direct and serious violations of the Federal Election Campaign Act (“FECA”).

2. Devolder-Santos for Congress is the principal campaign committee of George Anthony Devolder-Santos, also known as George Santos, the member of Congress representing New York’s third district. The Devolder Santos Victory Committee is a joint-fundraising committee supporting Devolder-Santos for Congress and GADS PAC. GADS PAC is a leadership PAC sponsored by George Santos. Devolder Santos for Congress Recount is a political committee authorized by George Santos. Devolder-Santos for Congress, Devolder Santos Victory Committee, GADS PAC, and Devolder-Santos Congress are referred to collectively herein as “Respondent Committees.” Unknown Respondents are the person or persons performing the duties of treasurer for the Respondent Committees.

3. Prior to January 25, 2023, Nancy Marks served as treasurer of each of the Respondent Committees. She resigned from her positions on that day. The Respondent

Committees then identified Thomas Datwyler as their respective treasurer in filings with the FEC ostensibly signed by Mr. Datwyler. In a series of letters from Mr. Datwyler’s counsel to the FEC on January 27, 2023, Mr. Datwyler stated that, contrary to the Respondent Committees’ representations to the FEC, he was not the treasurer of any of these committees and that he did not sign nor cause the filings. Almost one month later, in new filings, each committee identified an individual by the name of Andrew Olson as their respective treasurer.<sup>1</sup>

4. There is reason to believe, however, that Andrew Olson does not exist and that each Respondent Committee is operating without a treasurer, in violation of the FECA and FEC regulations. Mr. Olson is not and has not been identified as a treasurer to any political committee outside of those connected to Representative Santos. No one asked about it appears to know Mr. Olson, including those knowledgeable of political committee treasurers and New York Republican politics. His listed address on the FEC forms is the former address of Mr. Santos’s sister. He has not responded to any attempts to contact him through the means provided in the FEC filings.

5. “The Act designates treasurers to play a unique role in a political committee; indeed, a treasurer is the only office a political committee is required to fill.” FEC, Statement of Policy Regarding Treasurer’s Subject to Enforcement Proceedings, 70 Fed. Reg. 3, 3 (Jan. 3, 2005). “Without a treasurer, committees cannot undertake the host of activities necessary to carry out their mission, including receiving and disbursing funds and publicly disclosing their finances in periodic reports filed with the Commission.” *Id.* If they are operating without a

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<sup>1</sup> In addition to the Respondent Committees, other Santos-related committees have engaged in the same alarming course of conduct and have identified Mr. Olson as their treasurer after Ms. Marks resigned and after they falsely represented Mr. Datwyler was their treasurer. These other committees have filed termination paperwork with the FEC—ostensibly signed by Mr. Olson—but the FEC has not yet accepted their termination.

treasurer, the Santos-connected Respondent Committees are unable to ensure the public is accurately and timely informed about the committees' receipts and disbursements, depriving CREW and the public of the information to which they are entitled.

### Complainants

6. Complainant CREW is a non-profit corporation, organized under section 501(c)(3) of the Internal Revenue Code. CREW is committed to protecting the right of citizens to be informed about the activities of government officials, ensuring the integrity of government officials, protecting our political system from corruption, and reducing the influence of money in politics. CREW is dedicated to empowering voters to have an influential voice in government decisions and in the governmental decision-making process. CREW uses a combination of research, litigation, and advocacy to advance its mission.

7. In furtherance of its mission, CREW seeks to expose unethical and illegal conduct of those involved in government. One way that CREW does this is by educating citizens regarding the integrity of the electoral process and our system of government. Toward this end, CREW monitors the campaign finance activities of those who run for federal and state office and those who support or oppose such candidates and publicizes those who violate federal campaign finance laws through its website, press releases, and other methods of distribution. CREW also files complaints with the FEC when it discovers violations of the FECA. Publicizing campaign finance violators and filing complaints with the FEC serve CREW's mission of keeping the public informed about individuals and entities that violate campaign finance laws and deterring future violations of campaign finance law.

8. In order to assess whether an individual, candidate, political committee, or other regulated entity is complying with federal campaign finance law, CREW needs the information contained in receipts and disbursements reports that political committees and others must file pursuant to the FECA, 52 U.S.C. §§ 30103, 30104; 11 C.F.R. §§ 104.1–22, 109.10. CREW is hindered in its programmatic activity when an individual, candidate, political committee, or other regulated entity fails to disclose or provides false information in reports required by the FECA.

9. CREW relies on the FEC’s proper administration of the FECA’s reporting requirements because the FECA-mandated disclosure reports are the only source of information CREW can use to determine if an individual, candidate, political committee, or other regulated entity is complying with the FECA. The proper administration of the FECA’s reporting requirements includes mandating that all disclosure reports required by the FECA are properly and timely filed with the FEC. CREW is hindered in its programmatic activity when the FEC fails to properly administer the FECA’s reporting requirements.

#### Respondents

10. Devolder-Santos for Congress is the principal campaign committee for Representative George Santos. Devolder-Santos for Congress, FEC Form 1 (Statement of Organization) (March 27, 2023), <https://bit.ly/3LxJlkm>. Nancy Marks served as the treasurer for Devolder-Santos for Congress until January 25, 2023, when she resigned. *See* Nancy Marks, FEC Form 99 (Miscellaneous) (Jan. 31, 2023), <https://bit.ly/41V0hIn> (“Marks, Devolder-Santos for Congress Resignation Letter”). After Ms. Marks resigned, Devolder-Santos for Congress identified Thomas Datwyler as its treasurer in a filing Mr. Datwyler supposedly signed, *see* Devolder-Santos for Congress, FEC Form 1 (Statement of Organization) (Jan. 25, 2023),

<https://bit.ly/42c58oR>, but Mr. Datwyler made clear in a letter from counsel that he was not the committee's treasurer and did not cause the form to be filed, *see* Letter from Derek Ross to Jacqueline Gausepohl, Senior Campaign Finance Analyst, FEC Re: Devolder-Santos for Congress (Jan. 27, 2023), <https://bit.ly/42fk98H>. Thereafter, on February 21, 2023, Devolder-Santos for Congress filed a new Form 1 identifying Andrew Olson as its treasurer in a filing Mr. Olson supposedly signed. Devolder-Santos for Congress, FEC Form 1 (Statement of Organization) (Feb. 21, 2023), <https://bit.ly/40RVhml>. Mr. Olson is still listed as Devolder-Santos for Congress's treasurer in its most recent filing, which Mr. Olson supposedly continues to sign. Devolder-Santos for Congress, April 15 Quarterly Report (Apr. 15, 2023), <https://bit.ly/3AKGyiv>.

11. Devolder Santos Victory Committee is a joint-fundraising committee benefiting Devolder-Santos for Congress and GADS PAC. Devolder Santos Victory Committee, FEC Form 1 (Statement of Organization) (Mar. 27, 2023), <https://bit.ly/3npIbPO>. Nancy Marks served as the treasurer for Devolder Santos Victory Committee until January 25, 2023, when she resigned. *See* Nancy Marks, FEC Form 99 (Miscellaneous) (Jan. 31, 2023), <https://bit.ly/3AOvbX4> ("Marks, Devolder Santos Victory Committee Resignation Letter"). After Ms. Marks resigned, Devolder Santos Victory Committee identified Thomas Datwyler as its treasurer in a filing Mr. Datwyler supposedly signed, *see* Devolder Santos Victory Committee, FEC Form 1 (Statement of Organization) (Jan. 25, 2023), <https://bit.ly/3NzDI7E>, but Mr. Datwyler made clear in a letter from counsel that he was not the committee's treasurer and did not cause the form to be filed, *see* Letter from Derek Ross to Jacqueline Gausepohl, Senior Campaign Finance Analyst, FEC Re: Devolder Santos Victory Committee (Jan. 27, 2023), <https://bit.ly/3NxBwh0>. Thereafter, on

February 20, 2023, Devolder Santos Victory Committee filed a new Form 1 identifying Andrew Olson as its treasurer in a filing Mr. Olson supposedly signed. Devolder Santos Victory Committee, FEC Form 1 (Statement of Organization) (Feb. 20, 2023), <https://bit.ly/411c1HU>.

12. GADS PAC is a leadership PAC sponsored by Representative Santos. GADS PAC, FEC Form 1 (Statement of Organization) (Mar. 27, 2023), <https://bit.ly/3LnP4sF>. Nancy Marks served as the treasurer for GADS PAC until January 25, 2023, when she resigned. *See* Nancy Marks, FEC Form 99 (Miscellaneous) (Jan. 31, 2023), <https://bit.ly/3oW49tX> (“Marks, GADS PAC Resignation Letter”). After Ms. Marks resigned, GADS PAC identified Thomas Datwyler as its treasurer in a filing Mr. Datwyler supposedly signed, *see* GADS PAC, FEC Form 1 (Statement of Organization) (Jan. 25, 2023), <https://bit.ly/3Lmka45>, but Mr. Datwyler made clear in a letter from counsel that he was not the committee’s treasurer and did not cause the form to be filed, *see* Letter from Derek Ross to Jacqueline Gausepohl, Senior Campaign Finance Analyst, FEC Re: GADS PAC (Jan. 27, 2023), <https://bit.ly/40YyPZ5>. Thereafter, on February 20, 2023, GADS PAC filed a new Form 1 identifying Andrew Olson as its treasurer in a filing Mr. Olson supposedly signed. GADS PAC, FEC Form 1 (Statement of Organization) (Feb. 20, 2023), <https://bit.ly/3Lrx0xT>.

13. Devolder Santos for Congress Recount is an authorized committee affiliated with Representative Santos. Devolder Santos for Congress Recount, FEC Form 1 (Statement of Organization) (Mar. 27, 2023), <https://bit.ly/3LOJFMA>. Nancy Marks served as the treasurer for Devolder Santos for Congress Recount until January 25, 2023, when she resigned. *See* Nancy Marks, FEC Form 99 (Miscellaneous) (Jan. 31, 2023), <https://bit.ly/3B6SDiq> (“Marks, Devolder Santos for Congress Recount Resignation Letter”). After Ms. Marks resigned, Devolder Santos

for Congress Recount identified Thomas Datwyler as its treasurer in a filing Mr. Datwyler supposedly signed, *see* Devolder Santos for Congress Recount, FEC Form 1 (Statement of Organization) (Jan. 25, 2023), <https://bit.ly/44jhi0r>, but Mr. Datwyler made clear in a letter from counsel that he was not the committee’s treasurer and did not cause the form to be filed, *see* Letter from Derek Ross to Jacqueline Gausepohl, Senior Campaign Finance Analyst, FEC Re: Devolder Santos for Congress Recount (Jan. 27, 2023), <https://bit.ly/42c7XWZ>. Thereafter, on February 20, 2023, Devolder Santos for Congress Recount filed a new Form 1 identifying Andrew Olson as its treasurer in a filing Mr. Olson supposedly signed. Devolder Santos for Congress Recount, FEC Form 1 (Statement of Organization) (Feb. 20, 2023), <https://bit.ly/41U6eFB>.

14. Unknown Respondents are the person or persons, if any, performing the duties of treasurer for the respondents, including filing the statements and forms with the FEC on behalf of respondents as required by the FECA and FEC regulations.

#### Factual Allegations

15. George Santos first won election to represent New York’s third congressional district in 2022. New York State, *2022 Election Results, General Election Results—Certified December 15, 2022, Representatives in Congress*, <https://on.ny.gov/41Y4Hhz>. Almost immediately after his election, reporting revealed that Representative Santos repeatedly misrepresented himself in his campaign. Grace Ashford and Michael Gold, Who is Rep.-Elect George Santos? His Resume May be Largely Fiction, N.Y. Times (Dec. 19, 2022), <https://nyti.ms/3LxLYme>.

16. Representative Santos’s misrepresentations ranged from the shocking: that his “grandparents survived the holocaust,” Em Steck and Andrew Kaczynski, Incoming congressman’s claims his grandparents fled the Holocaust contradicted by genealogy records, CNN (Dec. 22, 2022), <https://cnn.it/40VHMC7>; *see also* Bryan Metzger, George Santos deleted his campaign biography and blamed ‘elitist’ New York Times for his lies about his employment history, Insider (Dec. 27, 2022), <https://bit.ly/3ne9xs8> (Santos “came clean about lying about ... the fact he isn’t Jewish,” and said “I never claimed to be Jewish ... I said I was ‘Jew-ish,’”); Michael Gold, George Santos’s Mother Was Not in New York on 9/11, Record Show, N.Y. Times (Jan. 18, 2023), <https://nyti.ms/42lXqrA> (Santos’s claim that his mother was in the South Tower of the World Trade Center during 9/11 attacks was false); to the familiar: embellishing his employment and education history, Michael Gold and Grace Ashford, George Santos Admits to Lying about College and Work History, N.Y. Times (Dec. 26, 2022), <https://nyti.ms/3Hy6TnX>; *see also* Bryan Metzger and Azmi Haroun, Incoming GOP congressman George Santos reportedly lied about his employment, his education, losing four employees in the Pulse shooting, his residence, his religious background, Insider (Dec. 28, 2022), <https://bit.ly/42eKKCS> (Santos lied about attending Horace Mann, losing employees in Pulse nightclub shooting, etc.)

17. Representative Santos has also used other, fake, names in the past when convenient. Andrew Kaczynski, Inside George Santos’ transformation from Anthony Devolder into a political figure, CNN (Feb. 1, 2023), <https://cnn.it/3B5a42V>; *see also* Joshua Zitser, George Santos used fake Jewish name on GoFundMe because he thought ‘Jews will give more.’



former roommate says, Insider (Jan. 18, 2023), <https://bit.ly/3nk9o6g> (alleging Representative Santos went by “Anthony Zabrovsky”).

18. Representative Santos’s disregard for the truth has led to misrepresentations in his committees’ filings with the FEC. Devolder-Santos for Congress was required to make significant revisions to its filings to correct a misrepresentation that \$500,000 in receipts were “personal funds of the candidate.” Joshua Zitser, George Santos hints that \$500k ‘personal’ loan to campaign wasn’t his own money, raising campaign-finance violation concerns, Insider (Jan. 25, 2023), <https://bit.ly/3VnGjDu> (reporting an additional \$125,000 loan purportedly from Rep. Santos revealed not to have originated from personal funds); *compare* Devolder-Santos for Congress, Amended April 15 Quarterly Report at 149 (Sept. 12, 2022), <https://bit.ly/3oVSXO1> *with* Devolder-Santos for Congress, Amended April 15 Quarterly Report at 156 (Jan. 24, 2023), <https://bit.ly/3LrxhRr>. Representative Santos’s campaign also appears to have at least made material misrepresentations about donors, if not entirely fabricating them. Lloyd Lee, Some donations from George Santos’s failed 2020 campaign are attributed to addresses that don’t exist, report says, Insider (Jan. 28, 2023), <https://bit.ly/3p2CcRr>. Donors were also apparently misled at Representative Santos’s urging. Alexandra Berzon and Grace Ashford, The Mysterious, Unregistered Fund that Raised Big Money for Santos, N.Y. Times (Jan. 19, 2023), <https://nyti.ms/3AMQeZZ>. Indeed, Representative Santos was recently indicted for his alleged participation in a scheme to misdirect contributions into a company owned by Representative Santos by falsely representing the funds were being contributed to a Section 501(c)(4) organization supporting his campaign. *See United States v. George Anthony Devolder Santos*, No. 23-CR-197 (E.D.N.Y. May 9, 2023), *available at* <https://bit.ly/3VYoSde>; *see also id.*

(alleging Representative Santos made fraudulent unemployment claims and made false representations in his House disclosure report).

19. Inquiries into these irregularities led to calls for Representative Santos to resign and caused him to step aside from House committee assignments. Annie Karni and Karoun Demirjian, Santos Temporarily Steps Aside From House Committee Amid Calls to Resign, N.Y. Times (Jan. 31, 2023), <https://nyti.ms/3LnrwnT>. Representative Santos blamed the irregularities on his then-treasurer to his various committees, Nancy Marks, but Ms. Marks stated that she was “duped” by Representative Santos. Grace Ashford and Nicholas Fandos, The Obscure G.O.P. Bookkeeper at the Center of the George Santos Mess, N.Y. Times (Apr. 21, 2023), <https://nyti.ms/3Hyq8xs>. Ms. Marks resigned as treasurer to the various Santos-related committees, including the Respondent Committees here, as of January 25, 2023. Marks, Devolder-Santos for Congress Resignation Letter; Marks, Devolder Santos Victory Committee Resignation Letter; Marks, GADS PAC Resignation Letter; Marks, Devolder Santos for Congress Recount Resignation Letter.

20. In the wake of Ms. Marks’s resignation, the Respondent Committees each identified Thomas Datwyler as their respective treasurer in filings that Mr. Datwyler was represented as having signed. *See* Devolder-Santos for Congress, FEC Form 1 (Statement of Organization) (Jan. 25, 2023); Devolder Santos Victory Committee, FEC Form 1 (Statement of Organization) (Jan. 25, 2023); GADS PAC, FEC Form 1 (Statement of Organization) (Jan. 25, 2023); Devolder Santos for Congress Recount, FEC Form 1 (Statement of Organization) (Jan. 25, 2023).

21. This was another fabrication. Mr. Datwyler made clear in a letter from counsel that he “is not the treasurer for [these] committee[s], did not file or authorize the filing of the Form 1[s], and did not authorize the Form 1[s] to be signed on his behalf.” Letter from Derek Ross Re: Devolder-Santos for Congress (Jan. 27, 2023) (requesting referral to law enforcement “to determine whether a crime has occurred”); Letter from Derek Ross Re: Devolder Santos Victory Committee (Jan. 27, 2023); Letter from Derek Ross Re: GADS PAC (Jan. 27, 2023); Letter from Derek Ross Re: Devolder Santos for Congress Recount (Jan. 27, 2023).

22. Thereafter, the Respondent Committees filed new Statements of Organization identifying Andrew Olson as their treasurer in filings Mr. Olson supposedly signed. Devolder-Santos for Congress, FEC Form 1 (Statement of Organization) (Feb. 21, 2023); Devolder Santos Victory Committee, FEC Form 1 (Statement of Organization) (Feb. 20, 2023); GADS PAC, FEC Form 1 (Statement of Organization) (Feb. 20, 2023); Devolder Santos for Congress Recount, FEC Form 1 (Statement of Organization) (Feb. 20, 2023). Mr. Olson is also listed as the treasurer and signatory on the Respondent Committees’ recent filings. *See* Devolder-Santos for Congress, April 15 Quarterly Report (Apr. 15, 2023); Devolder-Santos for Congress Recount, April 15 Quarterly Report (Apr. 14, 2023), <https://bit.ly/3p3R6qi>.

23. There is reason to believe that Mr. Olson does not exist and that the Respondent Committees made (additional) false representation to the FEC regarding who is acting as their treasurer and whether they currently have a treasurer at all.

24. Beyond the Respondent Committees and other Santos-connected political committees, Andrew Olson is not listed as a treasurer to any other political committee. FEC, Committees, Most Recent Treasurer Search, “Olson, Andrew,” (last visited May 10, 2023),

<https://bit.ly/3VnyAW6>. He appeared only in the wake of Ms. Marks's resignation and Mr. Datwyler's disassociation with the Respondent Committees.

25. Election officials in New York confirmed that no one by the name of Andrew Olson is listed as a treasurer to any political committee in the state. Joshua Ziter, George Santos's mysterious new treasurer is unknown to local politicians but lists his address as the apartment where Santos's sister used to live, Insider (Mar. 2, 2023), <https://bit.ly/3LKZ3tC>. Nassau County Republican Party officials also do not appear to know him, with the party's spokesperson saying he did "not know him" and had "not heard of him." *Id.* Attempts to contact Mr. Olson through the information provided in the FEC filings have failed. *Id.* The address associated with Mr. Olson in the FEC filings is the former address of Representative Santos's sister, and employees at the address did not recognize the name Andrew Olson. *Id.* CREW's own efforts to locate Mr. Olson, including searches of state and federal records and news reports, have also failed to confirm his existence.

26. Failing to staff committees with a treasurer would have a debilitating effect on the respondents. The FECA and FEC regulations mandate that political committees like respondents have a treasurer. 52 U.S.C. § 30102(a); 11 C.F.R. § 102.7(a). Further, they provide that "[n]o contribution or expenditure shall be accepted or made by or on behalf of a political committee during any period in which the office of treasurer is vacant." 52 U.S.C. § 30102(a); *accord* 11 C.F.R. § 102.7(b).<sup>2</sup>

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<sup>2</sup> As of the time of this filing, the Respondent Committees have not filed any item with the FEC indicating they have received contributions or made expenditures after the date of Ms. Marks's resignation. To the extent they have done so, however, but not reported them, they have also violated 52 U.S.C. § 30102(a) and 11 C.F.R. § 102.7(b).

27. Given Representative Santos's and the Respondent Committees' disregard for the truth, Representative Santos's practice of using fake names when it benefits him, the Respondent Committees' prior false representation that Mr. Datwyler was their treasurer, the legal necessity in identifying a treasurer for the Respondent Committees, the inability to contact Andrew Olson, and the lack of any record or independent source confirming Andrew Olson actually exists, there is reason to believe that Mr. Olson does not in fact exist and that the Respondent Committees have falsely represented that they have a treasurer or that they, by and through Unknown Respondents, have falsely reported that their treasurer is Mr. Olson.

#### Count I

28. The FECA and FEC regulations mandate that "[e]very political committee shall have a treasurer." 52 U.S.C. § 30102(a)(1); 11 C.F.R. § 102.7(a).

29. As alleged above and incorporated herein, on information and belief, the treasurer identified by the Respondent Committees, Andrew Olson, does not in fact exist. The Respondent Committees have identified no other individual as currently serving as their treasurer.

30. Accordingly, there is reason to believe Respondent Committees are currently operating without a treasurer in violation of 52 U.S.C. § 30102(a) and 11 C.F.R. § 102.7(a).

#### Count II

31. The FECA and FEC regulations require committees to provide the "name and address of the treasurer of the committee" to the FEC. 52 U.S.C. § 30103(b)(4), 11 C.F.R. § 102.2(a)(1)(iv).

32. As alleged above and incorporated herein, each of the Respondent Committees filed a Form 1 with the Federal Election Commission falsely identifying Thomas Datwyler as

their treasurer, which forms included forged signatures of Mr. Datwyler, and thus did not provide the name and address of their true treasurer as required by law.

33. In addition, as alleged above and incorporated herein, on information and belief, the individual identified as the treasurer to the Respondent Committees, Andrew Olson, does not exist, and therefore that the Respondent Committees have failed to provide the true and accurate name of individual performing the duties of treasurer for them, as required by law.

34. Accordingly, there is reason to believe the Respondent Committees have violated and are continuing to violate 52 U.S.C. § 30103(b)(4) and 11 C.F.R. § 102.2(a)(1)(iv).

35. Further, as someone filed the April quarterly reports on behalf of two of the Respondent Committees with the FEC, that or those Unknown Respondents performed the duty of treasurer for the Respondent Committees. *See* 52 U.S.C. § 30104(a)(1) (“Each treasurer of a political committee shall file reports of receipts and disbursements ....”); 11 C.F.R. § 104.5(a). Additionally, someone caused the Respondent Committees to file their amended statements of organization identifying Mr. Olson as their treasurer.

36. Accordingly, there is reason to believe such Unknown Respondents caused the Respondent Committees to file false reports with the FEC and fail to identify the committees’ treasurers truthfully and accurately, and thus personally violated and continue to violate 52 U.S.C. § 30103(b)(4) and 11 C.F.R. § 102.2(a)(1)(iv). *See also* FEC, *Statement of Policy Regarding Treasurers*, 70 Fed. Reg. at 5; FEC, *Instructions for Form 1 and Related Schedules* at 3 (Mar. 2022), <https://bit.ly/3p36Nyb> (“The treasurer of the political committee is personally responsible for the timely and complete filing of this Statement and for the accuracy of any information contained in it.”).

Conclusion

37. WHEREFORE, Citizens for Responsibility and Ethics in Washington requests that the FEC conduct an investigation into these allegations; declare the respondents to have violated the FECA and applicable FEC regulations; and order respondents to correct these violations by appointing a treasurer and correcting false filings with the FEC. In addition, the complainants request that the FEC impose sanctions appropriate to these violations, and take such further action as may be appropriate, including referring this matter to the Department of Justice for criminal prosecution.

*Noah Bookbinder*

ON BEHALF OF COMPLAINANT

Noah Bookbinder

President

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in Washington

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Verification

Citizens for Responsibility and Ethics in Washington hereby verifies that the statements made in the attached Complaint are, upon information and belief, true. Sworn pursuant to 18 U.S.C. § 1001.

Noah Bookbinder  
Noah Bookbinder

Sworn to and subscribed before me this 10th day of May, 2023

John Louis Williams Jr. County of Harris  
Notary Public, State of Texas  
Notarized online using audio-video communication  
Com Exp. 09/10/2024

