

**Subject: Complaint Filing: Gleason v. Jon Ossoff for Senate (C00718866) et al.
- Contributions in the Name of Another, Conduit Compliance Failures, and
Related Violations**

Lisa J. Stevenson, Acting General Counsel
Wanda D. Brown, Assistant General Counsel
Office of Complaints Examination & Legal Administration
Federal Election Commission
1050 First Street, NE
Washington, DC 20463

CC: Enforcement Division (ogcenforcement@fec.gov)

Dear Ms. Stevenson and Ms. Brown:

Pursuant to 52 U.S.C. Section 30109(a)(1) and 11 C.F.R. Section 111.4, I hereby transmit the following complaint for filing and assignment of a Matter Under Review (MUR) number.

COMPLAINT IDENTIFICATION

Complainant: Christopher Gleason, PO Box 398, Largo, FL 33779

Respondents:

- (1) Jon Ossoff for Senate (C00718866) and Mele, Steven, as Treasurer
- (2) Ossoff Victory Fund (C00750919)
- (3) Ossoff-Warnock Victory/Recount Fund (C00761163)
- (4) ActBlue (C00401224), as Conduit Co-Respondent
- (5) Democratic Senatorial Campaign Committee (C00042366)
- (6) Jon Ossoff, individually

Violations Alleged:

- 52 U.S.C. Section 30122 (Contributions in the Name of Another)
- 52 U.S.C. Section 30121 (Foreign National Contributions)
- 52 U.S.C. Section 30116 (Contribution Limit Violations)
- 52 U.S.C. Section 30104 (Disclosure Failures)
- 11 C.F.R. Section 110.6 (Conduit Compliance Failures)

SCALE OF VIOLATIONS

This complaint is supported by forensic analysis of 1.08 billion FEC contribution records

analyzed through 430+ independent detection methodologies. The analysis identifies:

- 94,264 smurf-classified donors contributing \$151,961,929.64 to Ossoff committees
- \$202,392,072.78 in ActBlue earmarks designated for Ossoff
- 2,339 contribution records with foreign national indicators (\$1,221,066.26)
- 2,523 contributors listing non-existent addresses per USPS DPV (\$1,190,514.88)
- 500 Georgia-based phantom contributors with no voter registration (\$760,150.32)
- 166 donors exceeding contribution limits (\$15,393,505.03 in excess)

The complaint further establishes constructive notice through eight governmental actions between October 2024 and May 2025, including the 19-State AG Coalition letter, Texas AG criminal referral, Congressional subpoena, and Presidential Memorandum directing DOJ investigation.

DOCUMENTS TRANSMITTED (ELECTRONIC ADVANCE COPIES)

1. Complaint (executed, sworn, and notarized) - 22 pages
2. Supplemental Memorandum: Commission Precedent and Enforcement Benchmarks - 10 pages
3. Exhibits Package (Exhibits A through U) - containing:
 - Exhibit A: Named Smurf Respondents (top 50 donors)
 - Exhibit B: Smurf Tier Cross-Reference by Cycle
 - Exhibit C: Contribution Volumes by Cycle
 - Exhibit D: Behavioral Profiles with Velocity Analysis
 - Exhibit E: DPV Non-Existent Addresses
 - Exhibit F: Phantom Contributors (Georgia)
 - Exhibit G: Foreign National Indicators (2,339 records)
 - Exhibit H: Employer/Occupation Compliance
 - Exhibit I: Contribution Limit Violations (166 donors)
 - Exhibit J: Structuring/Unitemized Analysis
 - Exhibit K: Post-Notice Smurf Persistence
 - Exhibit L: ActBlue Earmark Pipeline
 - Exhibit M: DSCC Cross-Contamination
 - Exhibit N: JFC Fund Flows
 - Exhibit O: Tiered Disgorgement Calculation
 - Exhibit P: Tier Classification Methodology
 - Exhibit Q: Statistical Methodology
 - Exhibit R: Voter Cross-Reference Methodology
 - Exhibit S: Enforcement Precedents
 - Exhibit T: Government Notice Timeline
 - Exhibit U: Multi-Cycle Escalation Analysis

4. Raw exhibit data files (CSV/TXT, 24 files)

PHYSICAL FILING

The signed, sworn, and notarized original complaint with three copies, the Supplemental Memorandum, and the complete Exhibits Package will be transmitted by certified mail and delivery service to the Office of General Counsel at the address above. This electronic transmission is provided as advance notice to enable prompt CELA intake processing.

CRIMINAL REFERRAL REQUEST

Section XVIII of the complaint requests referral to the Department of Justice for criminal investigation under 52 U.S.C. Section 30109(a)(5)(C). The complaint documents potential violations of 18 U.S.C. Sections 1343 (Wire Fraud), 1028A (Aggravated Identity Theft), 1956 (Money Laundering), and 371 (Conspiracy). I respectfully request that the Commission's evaluation of this complaint include consideration of whether the evidence warrants an expedited criminal referral, given the ongoing nature of the alleged violations and the approaching 2026 election cycle.

PRIORITY ENFORCEMENT REQUEST

Pursuant to the Commission's enforcement priority system, this complaint reflects multiple aggravating factors warranting high-priority classification: (1) a substantial amount of financial activity (\$151.9M+ in smurf-classified contributions); (2) high legal complexity involving conduit, straw donor, and foreign national violations; (3) the presence of possible knowing and willful intent as evidenced by post-notice persistence; and (4) violations in areas the Commission has set as enforcement priorities.

The 2026 election cycle is underway and the respondent committees continue to accept contributions from the smurf-classified population identified in this complaint. Prompt action is necessary to prevent further violations.