

FEDERAL ELECTION COMMISSION

COOLIDGE REAGAN FOUNDATION
1629 K Street NW, Suite 300
Washington, DC 20006

Complainant,

v.

ALEXANDRIA OCASIO-CORTEZ
216 Cannon House Office Building
Washington, DC 20515; and

ALEXANDRIA OCASIO-CORTEZ
FOR CONGRESS
FEC ID# C00639591
P.O. Box 680080
Corona, NY 11368
Frank Llewellyn, Treasurer,
In his official capacity

Respondents.

VERIFIED COMPLAINT

INTRODUCTION

This Complaint arises from Congresswoman Alexandria Ocasio-Cortez’s repeated, blatant violations of federal campaign finance law to conceal how she spent thousands of dollars of campaign funds. On numerous occasions throughout 2022, Congresswoman Ocasio-Cortez’s authorized candidate committee, Alexandria Ocasio-Cortez for Congress (“AOC for Congress”), reported tens of thousands of dollars of disbursements for card payments and card payment reimbursements to Congresswoman Ocasio-Cortez herself; American Express; and an entity called “Veyond!,” which appears to have provided virtual reality services and apparently no longer operates under that name.

In each case, the reports do not fully disclose the purposes of each payment for which the charge card was used; the sum of the specific Memo Item entries is consistently hundreds or even thousands of dollars less than the total amount paid to the recipient. Although campaigns are permitted to use charge cards (or reimburse candidates for use of their personal charge cards) for otherwise permissible campaign-related expense, their disclosure reports must accurately identify both the recipient of those funds, as well as each of the campaign-related goods and services those charge cards were used to purchase. Not only is the public entitled to that information, but without such disclosure, it is impossible to confirm a candidate is not illegally using campaign funds to pay personal expenses. *See* 52 U.S.C. § 30114(b)(1).

PARTIES

1. Complainant COOLIDGE REAGAN FOUNDATION (“the Foundation”) is a 501(c)(3) non-profit foundation dedicated to protecting the First Amendment and promoting free and fair elections.

2. Respondent ALEXANDRIA OCASIO-CORTEZ is a Member of Congress and candidate for Congress in the 2024 election.

3. Respondent ALEXANDRIA OCASIO-CORTEZ FOR CONGRESS is OCASIO-CORTEZ’s authorized candidate committee. Its Treasurer is Frank Llewelyn, who is named solely in his official capacity.

APPLICABLE LAW

4. 52 U.S.C. § 30104(a)(2)(A)(iii) and 11 C.F.R. § 104.5(a)(1)(i) require candidates for the U.S. House of Representatives to file quarterly disclosure reports with the FEC.

5. 52 U.S.C. § 30104(b)(4)(A), (D)-(E), and 11 C.F.R. § 104.3(b)(2)(i), (b)(3)(iii) requires such reports to disclose “all disbursements,” including “expenditures made to meet

candidate or committee operating expenses,” as well as “repayment of loans made by or guaranteed by the candidate” and “repayment of all other loans.”

6. 52 U.S.C. § 30104(b)(5)(A), (b)(6)(A) and 11 C.F.R. §§ 104.3(b)(4)(i), (b)(4)(vi), 104.9(a)-(b), require an authorized candidate committee to report the name and address of each person to whom an expenditure in an aggregate amount or value in excess of \$200 within the election cycle (including, but not limited to, within the calendar year) “is made by the reporting committee to meet a candidate or committee operating expense, together with the date, amount, and purpose of such operating expenditure.”

7. The FEC’s interpretive rule on the issue provides:

Any political committee that itemizes disbursements to credit card companies on Schedule B of its report filed with the Commission must itemize as a memo entry any transaction with a single vendor charged on the credit card that exceeds the \$200 itemization threshold. The memo entry must include the name and address of the vendor, and the date, amount, and purpose of the charge. Itemizing the ultimate payee, as the provider of goods or services to the political committee, accurately reflects the credit card company’s limited role as a payment processor rather than as the provider of goods and services to the committee. See 11 CFR 102.9. The itemization requirement prevents a committee from avoiding the Act’s disclosure requirements by placing operating expenditures on a credit card.

FEC, *Reporting Ultimate Payees of Political Committee Disbursements*, Notice 2013-09, 78 Fed. Reg. 40,625, 40,626-27 (July 8, 2013).

8. A political committee must maintain an “account” of “all disbursements” it makes, including a “record” of “the date, amount, and purpose of the disbursement.” 11 C.F.R. § 102.9(b)(1)(ii). In addition to that requirement, credit card transactions are governed by 11 C.F.R. § 102.9(b)(2)(ii). *See* 11 C.F.R. § 102.9(b)(2). That provision, in turn, requires a political committee to maintain “a monthly billing statement or customer receipt for each transaction and the cancelled check used to pay the credit card account.” 11 C.F.R. § 102.9(b)(2)(ii).

AOC for Congress' April Quarterly Report (2022)

9. On April 15, 2022, AOC for Congress filed its April Quarterly 2022 report. Nearly three months later, on July 13, 2022, the committee filed an amended version of that report.

10. Page 12,497 of AOC for Congress's Q1 2022 report (page 12,584 of the amended version) specifies on January 3, 2022, AOC for Congress disbursed \$21,226.96 to American Express for the stated purpose of "card payment." The following eight (8) entries in the report, spanning pages 12,497 through 12,499 (pages 12,584 through 12,586 of the amended version), are Memo Items identifying the specific goods and services which the committee had purchased with the card, and for which the committee was repaying American Express. Those entries total only \$21,174.65. There is a shortfall of \$52.61 which the report does not appear to identify. It does not appear AOC for Congress has revealed the purposes for which that additional \$52.61 was spent.

11. Page 12,501 of AOC for Congress's Q1 2022 report (page 12,588 of the amended report) specifies on February 7, 2022, AOC for Congress disbursed \$17,945.46 to American Express for the stated purpose of "Card payment." The following nine (9) entries in the report, spanning pages 12,501 through 12,504 (pages 12,588 through 12,591 of the amended version), are Memo Items specifying the goods and services which the committee had purchased with the card, and for which the committee was repaying American Express. Those entries total only \$17,842.89. There is a shortfall of \$105.57 which the report does not appear to identify. It does not appear AOC for Congress has revealed the purposes for which that additional \$105.57 was spent.

12. Page 12,505 of AOC for Congress's Q1 2022 report (page 12,592 of the amended report) specifies on March 10, 2022, AOC for Congress disbursed \$51,748.04 to American Express for the stated purpose of "card payment." The following thirty-eight (38) entries in the report, spanning pages 12,505 through 12,517 (pages 12,592 through 12,604 of the amended version), are

Memo Items specifying the goods and services which the committee had purchased with the card, and for which the committee was repaying American Express. Those entries total only \$51,498.05. There is a shortfall of \$249.99 which the report does not appear to identify. It does not appear AOC for Congress has revealed the purposes for which that additional \$249.99 was spent.

13. Page 12,526 of AOC for Congress's Q1 2022 report (page 12,614 of the amended report) specifies on February 10, 2022, AOC for Congress disbursed \$8,862.83 to American Express for the stated purpose of "card payment." The following sixteen (16) entries in the report, spanning pages 12,526 through 12,531 (pages 12,614 through 12,619 of the amended version), are Memo Items specifying goods and services which the committee had purchased with the card, and for which the committee was repaying American Express. Those entries total only \$8,719.14. There is a shortfall of \$143.69 which the report does not appear to identify. It does not appear AOC for Congress has revealed the purposes for which that additional \$143.69 was spent.

14. Page 12,535 of AOC for Congress's Q1 2022 report (page 12,623 of the amended report) specifies on January 28, 2022, AOC for Congress disbursed \$2,397.22 to American Express for the stated purpose of "card payment." The following four (4) entries in the report, spanning pages 12,535 through 12,536 (pages 12,623 through 12,624 of the amended version), are Memo Items specifying goods and services which the committee had purchased with the card, and for which the committee was repaying American Express. Those entries total only \$2,301.81. There is a shortfall of \$95.41 which the report does not appear to identify. It does not appear AOC for Congress has revealed the purposes for which that additional \$95.41 was spent.

15. Page 12,540 of AOC for Congress's Q1 2022 report (page 12,628 of the amended report) specifies on January 18, 2022, AOC for Congress disbursed \$5,127.44 to American Express for the stated purpose of "card payment." The following sixteen (16) entries in the report, on pages

12,540 through 12,545 (pages 12,628 through 12,633 of the amended version) are Memo Items specifying goods and services which the committee had purchased with the card, and for which the committee was repaying American Express. Those entries total only \$4,976.36. There is a shortfall of \$151.08, which the report does not appear to identify. It does not appear AOC for Congress has revealed the purposes for which that additional \$151.08 was spent.

16. Page 12,626 of AOC for Congress's Q1 2022 report (page 12,714 of the amended report) specifies on February 16, 2022, AOC for Congress disbursed \$5,136.34 to Alexandria Ocasio-Cortez for the stated purpose of "reimburse balance AMEX." The following nine (9) entries in the report, on pages 12,626 through 12,629 (pages 12,714 through 12,717 of the amended version) are Memo Items specifying goods and services which the committee had purchased with the card, and for which the committee was repaying Ocasio-Cortez. Those entries total only \$4,993.49. There is a shortfall of \$142.85, which the report does not appear to identify. It does not appear AOC for Congress has revealed the purposes for which that additional \$142.85 was spent.

17. Page 12,638 of AOC for Congress's Q1 2022 report specifies on January 25, 2022, AOC for Congress disbursed \$130,281.50 to an entity called Veyond! for the stated purpose of "card payment." There were no entries in the report specifying the goods and services which the committee had purchased with the card, and for which the committee was repaying Veyond! The amended report, in contrast, states on page 12,726 AOC for Congress disbursed \$131,281.50 to Veyond! on January 25, 2022, for "card payment." The following ninety-one (91) entries in the amended report, on pages 12,727 through 12,757, are Memo Items specifying the goods and services which the committee had purchased with the card, and for which the committee was repaying Veyond! Those entries total only \$130,618.18. This is a shortfall of \$663.32, which the

report does not appear to identify. It does not appear AOC for Congress has revealed the purposes for which that additional \$663.32 was spent.

18. Page 12,638 of AOC for Congress' Q1 2022 report (page 12,757 of the amended report) specifies on February 25, 2022, AOC for Congress disbursed \$19,245.62 to an entity called Veyond! for the stated purpose of "card payment." The following seventy-one (71) entries in the original report, on pages 12,639 through 12,662, are Memo Items specifying goods and services which the committee had purchased with the card, and for which the committee was repaying Veyond! Those entries total only \$17,851.70. There is a shortfall of \$1,393.92, which the report does not appear to identify. It does not appear AOC for Congress has revealed the purposes for which that additional \$1,393.92 was spent.

a. The amended report, in contrast, lists seventy-two (72) entries on pages 12,757 through 12,781, including the same 71 entries from the original report as well as an additional Memo Item entry on page 12,767 reflecting a payment of \$89.99 to HooJobs on February 20, 2022.

b. The entries in the amended report total only \$17,941.69. There is a shortfall of \$1,303.93, which the amended report does not appear to identify. It does not appear AOC for Congress has revealed the purposes for which that additional \$1,303.93 was spent.

19. Page 12,662 of AOC for Congress' Q1 2022 report (page 12,781 of the amended report) specifies on March 25, 2022, AOC for Congress disbursed \$56,524.26 to an entity called Veyond! for the stated purpose of "card payment." The following eighty-four (84) entries in the report, on pages 12,663 through 12,690 are Memo Items specifying goods and services which the committee had purchased with the card, and for which the committee was repaying Veyond!. Those entries total only \$55,693.39. There is a shortfall of \$830.87, which the report does not

appear to identify. It does not appear AOC for Congress has revealed the purposes for which that additional \$830.87 was spent.

a. The amended report, in contrast, lists eighty-six entries on pages 12,782 through 12,810, including the same 84 entries from the original report as well as an additional two Memo Item entries: a payment of \$89.99 to HooJobs on February 20, 2022 (page 12,794) and a payment of \$114.80 to Mon Bento on March 12, 2022 (page 12,800).

b. The entries in the amended report total only \$55,898.18. There is a shortfall of \$626.08, which the amended report does not appear to identify. It does not appear AOC for Congress has revealed the purposes for which that additional \$626.08 was spent.

20. The following chart summarizes AOC for Congress' unreported disbursements for credit card payments in its April Quarterly Report (2022):

Date	Recipient	Purpose	Amount of Disbursement	Page in Original / Amended Report	Total Amount of Reported Memo Entries	Unreported Shortfall
Jan. 3, 2022	American Express	card payment	\$21,226.96	12,497 / 12,584	\$21,174.65	\$52.61
Jan. 18, 2022	American Express	card payment	\$5,127.44	12,540 / 12,628	\$4,976.36	\$151.08
Jan. 25, 2022	Veyond!	card payment	\$130,281.50 / \$131,281.50	12,638 / 12,726	\$0 in original report / \$130,618.18 in amended report	\$130,281.50 in original report / \$663.32 in amended report
Jan. 28, 2022	American Express	card payment	\$2,397.22	12,535 / 12,623	\$2,301.81	\$95.41
Feb. 7, 2022	American Express	Card payment	\$17,945.46	12,501 / 12,588	\$17,842.89	\$105.57
Feb. 10, 2022	American Express	card payment	\$8,862.83	12,526 / 12,614	\$8,719.14	\$143.69
Feb. 16, 2022	OCASIO-CORTEZ, Alexandria	reimburse balance AMEX	\$5,136.34	12,626 / 12,714	\$4,993.49	\$142.85
Feb. 25, 2022	Veyond!	card payment	\$19,245.62	12,638 / 12,757	\$17,851.70 in original report / \$17,941.69 in amended report	\$1,393.92 in original report / \$1,303.93 in amended report
Mar. 10, 2022	American Express	card payment	\$51,748.05	12,505 / 12,592	\$51,498.05	\$249.99
Mar. 25, 2022	Veyond!	card payment	\$56,524.26	12,662 / 12,781	\$55,693.39 in original report / \$55,898.18 in amended report	\$830.87 in original report / \$626.08 in amended report
Total Shortfall in Explanations for Credit Card Payments in Amended Report: \$3,534.53						

21. AOC for Congress' payments to Alexandria Ocasio-Cortez, American Express, and/or Veyond! violate 52 U.S.C. § 30104(b) and 11 C.F.R. § 104.3(b) to the extent they include reimbursement or repayment for transactions with any vendors which, individually or combined with other transactions with those vendors over the course of this election cycle, exceed \$200.

22. On information and belief, reason to believe exists AOC for Congress' payments to Veyond! may violate 52 U.S.C. § 30104(b) and 11 C.F.R. § 104.3(b) by improperly failing to accurately disclose their actual recipient. It appears the entity previously referred to as Veyond!,

which focused primarily on virtual reality systems, has been renamed Brex and refocused on providing credit services. *See, e.g.,* Erin Griffith, *Bad Times in Tech? Not If You're a Start-Up Serving Other Start-Ups*, N.Y. TIMES (Aug. 2, 2019) (“They were participating in Y Combinator, a start-up accelerator, with an idea for a virtual-reality company, Veyond. . . . [T]hey turned Veyond into a credit card company, which they later renamed Brex.”), <https://www.nytimes.com/2019/08/02/technology/brex-start-up.html>; *see also* Y Combinator, *Q&A with Henrique Dubugras and Pedro Franceschi, Cofounders of Brex*, Y COMBINATOR (Oct. 17, 2018) (“We actually started YC working on a virtual reality concept — but we quickly pivoted to corporate cards. Our first name was ‘Veyond’, which was actually on some of our first cards as it took some time to change our name.”), <https://www.ycombinator.com/blog/qa-with-henrique-dubugras-and-pedro-franceschi-cofounders-of-brex>.

23. Veyond! does not appear to have a website. According to Brex’s website, Brex’s address is 12832 Frontrunner Blvd., Suite 500, Draper UT 84020. *See* <https://www.brex.com/contact-us>.

24. AOC FOR CONGRESS’ first quarter report, in contrast, listed the following address for Veyond!: “153 Townsend St Fl 6 San Francisco CA 94107-3909.”

AOC for Congress’ July Quarterly Report (2022)

25. On July 15, 2022, AOC for Congress filed its July Quarterly 2022 report. Nearly a month later, on August 11, 2022, the committee filed an amended version of that report.

26. Page 13,134 of AOC for Congress’s Q2 2022 report (page 13,135 of the amended version) specifies on April 14, 2022, AOC for Congress disbursed \$8,890.62 to American Express for the stated purpose of “card payment.” The following fifteen (15) entries in the report, spanning pages 13,135 through 13,139 (pages 13,136 through 13,140 of the amended version), are Memo

Items identifying the specific goods and services which the committee had purchased with the card, and for which the committee was repaying American Express. Those entries total only \$8,454.47. There is a shortfall of \$436.15 which the report does not appear to identify. It does not appear AOC for Congress has revealed the purposes for which that additional \$436.15 was spent.

27. Page 13,140 of AOC for Congress's Q2 2022 report (page 13,141 of the amended version) specifies on April 12, 2022, AOC for Congress disbursed \$44,718.96 to American Express for the stated purpose of "card payment." The following fifty (50) entries in the report, spanning pages 13,140 through 13,156 (pages 13,141 through 13,157 of the amended version), are Memo Items identifying the specific goods and services which the committee had purchased with the card, and for which the committee was repaying American Express. Those entries total only \$44,617.87. There is a shortfall of \$101.09 which the report does not appear to identify. It does not appear AOC for Congress has revealed the purposes for which that additional \$101.09 was spent.

28. Page 13,157 of AOC for Congress's Q2 2022 report (page 13,158 of the amended version) specifies on May 10, 2022, AOC for Congress disbursed \$71,470.54 to American Express for the stated purpose of "card payment." The following eighty-two (82) entries in the report, spanning pages 13,157 through 13,184 (pages 13,158 through 13,185 of the amended version), are Memo Items identifying the specific goods and services which the committee had purchased with the card, and for which the committee was repaying American Express. Those entries total only \$71,096.53. There is a shortfall of \$374.01 which the report does not appear to identify. It does not appear AOC for Congress has revealed the purposes for which that additional \$374.01 was spent.

29. Page 13,200 of AOC for Congress's Q2 2022 report (page 13,201 of the amended version) specifies on June 9, 2022, AOC for Congress disbursed \$37,450.07 to American Express for the stated purpose of "AMEX statement payment." The following fifty-five (55) entries in the report, spanning pages 13,200 through 13,218 (pages 13,201 through 13,219 of the amended version), are Memo Items identifying the specific goods and services which the committee had purchased with the card, and for which the committee was repaying American Express. Those entries total only \$37,325.07. There is a shortfall of \$125.00 which the report does not appear to identify. It does not appear AOC for Congress has revealed the purposes for which that additional \$125.00 was spent.

30. Page 13,318 of AOC for Congress's Q2 2022 report (page 13,319 of the amended version) specifies on April 25, 2022, AOC for Congress disbursed \$41,399.99 to Veyond! for the stated purpose of "card payment." The following one-hundred and eleven (111) entries in the report, spanning pages 13,318 through 13,356 (pages 13,319 through 13,357 of the amended version), are Memo Items identifying the specific goods and services which the committee had purchased with the card, and for which the committee was repaying American Express. Those entries total only \$40,745.95. There is a shortfall of \$654.04 which the report does not appear to identify. It does not appear AOC for Congress has revealed the purposes for which that additional \$654.04 was spent.

31. Page 13,356 of AOC for Congress's Q2 2022 report (page 13,357 of the amended version) specifies on May 25, 2022, AOC for Congress disbursed \$35,701.90 to Veyond! for the stated purpose of "card payment." The following eighty-four (84) entries in the report, spanning pages 13,357 through 13,384 (pages 13,358 through 13,385 of the amended version), are Memo Items identifying the specific goods and services which the committee had purchased with the

card, and for which the committee was repaying American Express. Those entries total only \$33,121.93. There is a shortfall of \$2,579.97 which the report does not appear to identify. It does not appear AOC for Congress has revealed the purposes for which that additional \$2,579.97 was spent.

32. Page 13,385 of AOC for Congress's Q2 2022 report (page 13,386 of the amended version) specifies on June 25, 2022, AOC for Congress disbursed \$67,270.11 to Veyond! for the stated purpose of "card payment." The following one-hundred and eleven (111) entries in the report, spanning pages 13,385 through 13,422 (pages 13,386 through 13,423 of the amended version), are Memo Items identifying the specific goods and services which the committee had purchased with the card, and for which the committee was repaying American Express. Those entries total only \$65,449.30. There is a shortfall of \$1,820.81 which the report does not appear to identify. It does not appear AOC for Congress has revealed the purposes for which that additional \$1,820.81 was spent.

33. The following chart summarizes AOC for Congress' unreported disbursements for credit card payments in its July Quarterly Report (2022):

Date	Recipient	Purpose	Amount of Disbursement	Page in Original / Amended Report	Total Amount of Reported Memo Entries	Unreported Shortfall
Apr. 12, 2022	American Express	card payment	\$44,718.96	13,140 / 13,141	\$44,617.87	\$101.09
Apr. 14, 2022	American Express	card payment	\$8,890.62	13,134 / 13,135	\$8,454.47	\$436.15
Apr. 25, 2022	Veyond!	card payment	\$41,399.99	13,318 / 13,319	\$40,745.95	\$654.04
May 10, 2022	American Express	card payment	\$71,470.54	13,157 / 13,158	\$71,096.53	\$374.01
May 25, 2022	Veyond!	card payment	\$35,701.90	13,356 / 13,357	\$33,121.93	\$2,579.97
June 9, 2022	American Express	AMEX statement payment	\$37,450.07	13,200 / 13,201	\$37,325.07	\$125.00
June 25, 2022	Veyond!	card payment	\$67,270.11	13,385 / 13,386	\$65,449.30	\$1,820.81
Total Shortfall in Explanations for Credit Card Payments in Amended Report: \$6,091.07						

34. AOC for Congress' payments to American Express and/or Veyond! violate 52 U.S.C. § 30104(b) and 11 C.F.R. § 104.3(b) to the extent they include reimbursement or repayment for transactions with any vendors which, individually or combined with other transactions with those vendors over the course of this election cycle, exceed \$200.

35. On information and belief, reason to believe exists AOC for Congress' payments to Veyond! may violate 52 U.S.C. § 30104(b) and 11 C.F.R. § 104.3(b) by improperly failing to accurately disclose their actual recipient or its actual address.

CAUSES OF ACTION

**COUNT I – FAILURE TO REPORT DISBURSEMENTS
IN APRIL 15, 2022 QUARTERLY DISCLOSURE REPORT
Against Respondents ALEXANDRIA OCASIO-CORTEZ and AOC FOR CONGRESS**

36. Complainant COOLIDGE-REAGAN FOUNDATION realleges the foregoing allegations as if set forth fully herein.

37. In AOC FOR CONGRESS' first quarter report filed on April 15, 2022, and amended on July 13, 2022, the committee systematically failed to disclose the vendors and

purposes for the expenditures it made with credit cards that is used campaign funds to repay, including:

- a. \$52.61 from its January 3, 2022 payment to American Express;
- b. \$151.08 from its January 18, 2022 payment to American Express;
- c. \$663.32 from its January 25, 2022 payment to Veyond!;
- d. \$95.41 from its January 28, 2022 payment to American Express;
- e. \$105.57 from its February 7, 2022 payment to American Express;
- f. \$143.69 from its February 10, 2022 payment to American Express;
- g. \$142.85 from its February 16, 2022 payment to Alexandria Ocasio-Cortez;
- h. \$1,303.93 from its February 25, 2022 payment to Veyond!;
- i. \$249.99 from its March 10, 2022 payment to American Express; and
- j. \$626.08 from its March 25, 2022 payment to Veyond!

38. AOC FOR CONGRESS' disclosures concerning its payments to Alexandria Ocasio-Cortez, American Express, and/or Veyond! violate 52 U.S.C. § 30104(b) and 11 C.F.R. § 104.3(b) to the extent those payments include reimbursement or repayment for transactions with any vendors which, individually or combined with other transactions with those vendors over the course of this election cycle, exceed \$200.

WHEREFORE the Commission should conclude Alexandria Ocasio-Cortez and AOC for Congress violated federal campaign finance law and regulations and institute a civil action for relief in the U.S. District Court for the District of Columbia.

**COUNT II – FAILURE TO ACCURATELY IDENTIFY RECIPIENT OF REPORT
DISBURSEMENTS IN APRIL 15, 2022 QUARTERLY DISCLOSURE REPORT
Against Respondents ALEXANDRIA OCASIO-CORTEZ and AOC FOR CONGRESS**

39. Complainant COOLIDGE-REAGAN FOUNDATION realleges the foregoing allegations as if set forth fully herein.

40. AOC FOR CONGRESS' first quarter report filed on April 15, 2022, and amended on July 13, 2022, revealed payments to an entity called Veyond! on January 25, 2022; February 25, 2022; and March 25, 2022, totaling \$204,458.05 based on figures in the amended version of the report.

41. On each of these occasions, AOC FOR CONGRESS' first quarter report listed the following address for Veyond!: "153 Townsend St Fl 6 San Francisco CA 94107-3909."

42. On information and belief, Veyond! does not appear to be the name of the entity to which these funds were paid.

43. On information and belief, neither Veyond! nor any successor-in-interest appears to have an operating address of "153 Townsend St Fl 6 San Francisco CA 94107-3909."

44. AOC FOR CONGRESS' disclosures of its payments to Veyond! violate 52 U.S.C. § 30104(b) and 11 C.F.R. § 104.3(b) to the extent they do not accurately identify the recipient and/or its actual address.

WHEREFORE the Commission should conclude Alexandria Ocasio-Cortez and AOC for Congress violated federal campaign finance law and regulations and institute a civil action for relief in the U.S. District Court for the District of Columbia.

**COUNT III – FAILURE TO REPORT DISBURSEMENTS
IN JULY 15, 2022 QUARTERLY DISCLOSURE REPORT
Against Respondents ALEXANDRIA OCASIO-CORTEZ and AOC FOR CONGRESS**

45. Complainant COOLIDGE-REAGAN FOUNDATION realleges the foregoing allegations as if set forth fully herein.

46. In AOC FOR CONGRESS’ second quarter report filed on July 15, 2022, and amended on August 11, 2022, the committee systematically failed to disclose the vendors and purposes for the expenditures it made with credit cards that is used campaign funds to repay, including:

- a. \$101.09 from its April 12, 2022 payment to American Express;
- b. \$436.15 from its April 14, 2022 payment to American Express;
- c. \$654.04 from its April 25, 2022 payment to Veyond!;
- d. \$374.01 from its May 10, 2022 payment to American Express;
- e. \$2,579.97 from its May 25, 2022 payment to Veyond!;
- f. \$125.00 from its June 9, 2022 payment to American Express; and
- g. \$1,820.81 from its June 25, 2022 payment to Veyond!.

47. AOC FOR CONGRESS’ disclosures concerning its payments to American Express and/or Veyond! violate 52 U.S.C. § 30104(b) and 11 C.F.R. § 104.3(b) to the extent those payments include reimbursement or repayment for transactions with any vendors which, individually or combined with other transactions with those vendors over the course of this election cycle, exceed \$200.

WHEREFORE the Commission should conclude Alexandria Ocasio-Cortez and AOC for Congress violated federal campaign finance law and regulations and institute a civil action for relief in the U.S. District Court for the District of Columbia.

**COUNT IV – FAILURE TO ACCURATELY IDENTIFY RECIPIENT OF REPORT
DISBURSEMENTS IN APRIL 15, 2022 QUARTERLY DISCLOSURE REPORT
Against Respondents ALEXANDRIA OCASIO-CORTEZ and AOC FOR CONGRESS**

48. Complainant COOLIDGE-REAGAN FOUNDATION realleges the foregoing allegations as if set forth fully herein.

49. AOC FOR CONGRESS’ second quarter report filed on April 15, 2022, and amended on August 11, 2022, revealed payments to an entity called Veyond! on April 25, 2022; May 25, 2022; and June 25, 2022, totaling \$139,367.18 based on figures in the amended version of the report.

50. On each of these occasions, AOC FOR CONGRESS’ first quarter report listed the following address for Veyond!: “153 Townsend St Fl 6 San Francisco CA 94107-3909.”

51. On information and belief, Veyond! does not appear to be the name of the entity to which these funds were paid.

52. On information and belief, neither Veyond! nor any successor-in-interest appears to have an operating address of “153 Townsend St Fl 6 San Francisco CA 94107-3909.”

53. AOC FOR CONGRESS’ disclosures of its payments to Veyond! violate 52 U.S.C. § 30104(b) and 11 C.F.R. § 104.3(b) to the extent they do not accurately identify the recipient and/or its actual address.

WHEREFORE the Commission should conclude Alexandria Ocasio-Cortez and AOC for Congress violated federal campaign finance law and regulations and institute a civil action for relief in the U.S. District Court for the District of Columbia.

CONCLUSION

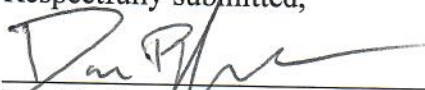
For these reasons, Complainant Coolidge Reagan Foundation respectfully requests the Federal Election Commission commence enforcement proceedings against Respondents.

VERIFICATION

I declare under penalty of perjury the foregoing is true and correct to the best of my personal knowledge.

Dated April 12, 2023

Respectfully submitted,



Dan Backer, Esq.

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Counsel for Complainant

Coolidge Reagan Foundation

COMPLETED BEFORE A NOTARY PUBLIC

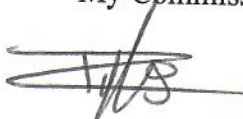
State of Florida

City of Lighthouse Point

County of Broward

Subscribed and sworn to before me on this 12 day of April, 2023.

My Commission expires on 02/01/2027.



Isabel Sanchez
Comm.: HH 356925
Expires: February 1, 2027
Notary Public - State of Florida