

BEFORE THE FEDERAL ELECTION COMMISSION

CAMPAIGN LEGAL CENTER
SOPHIA GONSALVES-BROWN
1101 14th Street NW, Suite 400
Washington, DC 20005

v.

MUR No. _____

LEAD LEFT PAC and
TAMMIE CANNON in her
official capacity as treasurer
2241 North Monroe Street #1447
Tallahassee, FL 32303

COMPLAINT

1. Lead Left PAC (“Lead Left”), a pop-up super PAC formed less than three weeks ago, has rapidly spent over \$2.4 million influencing Democratic primary elections in Nebraska, Pennsylvania, and Texas. In addition to strategically gaming federal reporting deadlines to avoid disclosing the *sources* of its election spending, Lead Left also appears to have violated federal campaign finance laws requiring full transparency about the *recipients* of that spending. Specifically, by funneling all of its spending on political ads through two newly formed companies that are almost certainly not the ultimate recipients of those funds, Lead Left appears to have violated federal reporting requirements. By using these apparent shell companies as opaque clearinghouses to conceal who is actually being paid to provide it with goods and services, Lead Left PAC has unlawfully denied voters crucial information about how it is spending its money.
2. This complaint is filed pursuant to 52 U.S.C. § 30109(a)(1) and is based on information and belief that Lead Left PAC and Tammie Cannon in her official capacity as treasurer violated the Federal Election Campaign Act (FECA), 52 U.S.C. § 30101, *et seq.*¹

¹ See 52 U.S.C. § 30109(a)(2); *see also* 11 C.F.R. § 111.4(a).

FACTS

3. Lead Left PAC registered with the FEC as a super PAC on April 24, 2026.² It named Tammie Cannon as its treasurer and listed 2241 North Monroe Street in Tallahassee, Florida as its address.³ That address is the location of a Staples store with a virtual mailbox service.⁴ Tammie Cannon is not the treasurer of any other federally registered political committee.⁵
4. On May 7, 2026, less than two weeks after its registration, Lead Left began filing 48-hour or 24-hour reports of independent expenditures (IEs), *i.e.*, reports triggered by paying for independent communications—not coordinated with a candidate’s campaign or political party committee—which expressly advocate the election or defeat of a clearly identified federal candidate.⁶ Within less than three weeks of being formed, Lead Left has reported spending \$2,450,959 on IEs over a ten-day period.⁷
5. Lead Left has reported paying for IEs running from May 5th through the present in the following races:
 - a. Supporting Lamont McClure and opposing Bob Brooks and Ryan Crosswell in the Democratic primary for Pennsylvania’s 7th congressional district;

² Lead Left PAC, Statement of Org. at 1 (Apr. 24, 2026), <https://docquery.fec.gov/pdf/833/202604249866697833/202604249866697833.pdf>.

³ *Id.*

⁴ Store #1072, Staples, <https://stores.staples.com/fl/tallahassee/2241-north-monroe-street> (last visited May 13, 2026).

⁵ See Browse Data: Most Recent Treasurer (Tammie Cannon), FEC, https://www.fec.gov/data/committees/?treasurer_name=tammie+cannon (last visited May 13, 2026).

⁶ 52 U.S.C. §§ 30101(17), 30104(g)(1); 11 C.F.R. §§ 100.16, 104.4(c).

⁷ *Independent Expenditures*, “Lead Left PAC,” Raw Data (24- and 48-Hour Reports), FEC.gov, https://www.fec.gov/data/independent-expenditures/?data_type=efiling&committee_id=C00948208&is_notice=true&most_recent=true (last viewed May 14, 2026).

- b. Opposing John Cavanaugh in the Democratic primary for Nebraska’s 2nd congressional district; and
 - c. Supporting Maureen Galindo and opposing Johnny Garcia in the Democratic primary runoff in Texas’s 35th congressional district.⁸
6. Lead Left has strategically gamed its reporting schedule to ensure that it does not have to report any information about the sources of its funding until after the various elections it is spending millions of dollars to influence.⁹
7. While Lead Left’s exploitation of federal rules to conceal the sources of funding for its IEs may not be unlawful, the super PAC also appears to have violated federal rules requiring full transparency about who it is actually paying for services related to those IEs. Lead Left has reported spending over \$2.4 million in IEs to just two recipients,

⁸ See *Lead Left PAC: 24- and 48-Hour Reports*, FEC, <https://www.fec.gov/data/committee/C00948208/?tab=filings> (last visited May 14, 2026) [hereinafter, “IE Reports”].

⁹ Lead Left has not filed any periodic reports disclosing its funding sources or operating costs, and thus appears to perfectly fit the model of an opaque, “pop-up” super PAC that strategically games the federal disclosure rules and reporting deadlines to avoid disclosing information about its donors until after the relevant election(s) is over. See *Lead Left PAC: Committee Filings*, FEC, <https://www.fec.gov/data/committee/C00948208/?tab=filings> (last visited May 14, 2026); see also Carolyn Daly, *Pop-Up Super PACs Game the System to Leave Voters in the Dark*, Campaign Legal Ctr. (June 4, 2024), <https://campaignlegal.org/update/pop-super-pacs-game-system-leave-voters-dark>. Since Nebraska’s primary election was held on May 12, 2026, Nebraska voters did not know who funded Lead Left’s ads when they went to the polls. Pennsylvania’s pre-primary election reporting period has come and gone, which means voters there cannot expect any transparency regarding the sources of over \$1.6 million in Lead Left-funded IEs targeting them before voting in the state’s May 19, 2026, primary election. *Primary Election Report Notice – Pennsylvania*, FEC, <https://www.fec.gov/help-candidates-and-committees/dates-and-deadlines/2026-reporting-dates/prior-notices-2026/election-report-notice-pennsylvania/> (last visited May 13, 2026). Moreover, because Lead Left filed to change the frequency of its periodic reporting—from quarterly to monthly filing—on May 13, 2026, it avoided having to file a pre-primary election report in Texas, which it would otherwise have been required to file based on its reported IE spending on May 5, 2025, which fell within the Texas pre-primary-runoff election period (from April 1, 2026, through May 6, 2026). See *Lead Left PAC*, FEC Form 99 (May 13, 2026), <https://docquery.fec.gov/pdf/865/202605139866955865/202605139866955865.pdf> (changing filing frequency from quarterly to monthly); *Monthly Filers (Election-Year)*, FEC, <https://www.fec.gov/help-candidates-and-committees/filing-pac-reports/nonconnected-committee-monthly-filers/> (last visited May 13, 2026) (“Monthly filers don’t have to file pre-primary or special election reports.”); *Primary Election Report Notice – Texas*, FEC, <https://www.fec.gov/help-candidates-and-committees/dates-and-deadlines/2026-reporting-dates/prior-notices-2026/election-report-notice-texas/> (last visited May 13, 2026).

Piruzi LLC (“Piruzi”) and OTG Media LLC (“OTG Media”), both of which were formed within the past five weeks.¹⁰

8. Piruzi has obvious ties to Lead Left; it was incorporated in Wyoming on April 10, 2026, just two weeks before Lead Left registered with the FEC as a super PAC.¹¹ Its organizer and incorporator, Tammie Cannon, also serves as Lead Left’s treasurer.¹²
9. Lead Left has reported paying Piruzi \$837,148.70 for media production and placement, as well as printing and postage.¹³ The super PAC lists two different addresses for Piruzi on its IE reports: (1) “2241 North Monroe Street #1447, Tallahassee, FL 32303” and (2) “6901A North 9th Avenue #590, Pensacola, FL 32504.”¹⁴ The first address is the exact same as the super PAC’s address, down to the mailbox number.¹⁵ The second address is a private postal store that offers virtual mailboxes.¹⁶
10. Piruzi appears to have no online presence, is not a registered business in Florida,¹⁷ and does not appear to have provided services to any other federal committee.¹⁸

¹⁰ See IE Reports, *supra* note 8.

¹¹ Piruzi LLC, Wy. Sec’y of State, <https://wyobiz.wyo.gov/Business/FilingDetails.aspx?eFNum=029102122047134236190101142097015130033218125085> (last visited May 13, 2026).

¹² See *id.*

¹³ See IE Reports, *supra* note 8.

¹⁴ See *id.*

¹⁵ See Lead Left PAC, Statement of Org. at 1, *supra* note 2.

¹⁶ 2B Postal, <https://www.2bpostal.com> (last visited May 13, 2026).

¹⁷ See Sunbiz Search (Piruzi), Fla. Div. of Corps., <https://search.sunbiz.org/Inquiry/CorporationSearch/SearchResults/EntityName/piruzi/Page1?searchNameOrder=PIRUZI> (last visited May 13, 2026).

¹⁸ See Search Disbursements (Piruzi), FEC, https://www.fec.gov/data/disbursements/?data_type=processed&recipient_name=piruzi&two_year_transaction_period=2026&min_date=01%2F01%2F2025&max_date=12%2F31%2F2026 (last visited May 13, 2026).

11. Lead Left’s other IE-payment recipient, OTG Media, was incorporated in Virginia on April 29, 2026, only five days after Lead Left registered with the FEC.¹⁹ A generic registered agent filed its incorporation documents, which do not name an individual incorporator or organizer.²⁰
12. Lead Left has reported paying OTG Media \$1,613,810 for media placement and production; its IE reports list “8401 Maryland Drive, Suite A, Richmond, VA 23294” as the LLC’s address.²¹ This Maryland Drive address corresponds to the address of OTG Media’s registered agent.²²
13. Like Piruzi, OTG Media appears to have no online presence, and no other federal committee appears to have reported paying the entity for any goods or services.²³
14. According to a May 8, 2026, article in *Punchbowl News*, political operatives involved in the PA-07, NE-02, and TX-35 Democratic primaries suspected that Lead Left is a Republican effort “to tip the scales toward [Republicans’] preferred general-election opponent[s].”²⁴ *Punchbowl* reported that Lead Left’s website featured metadata (which was later deleted) from WinRed, a Republican digital fundraising platform; the races it has targeted are high electoral priorities for the Democratic Congressional Campaign Committee (DCCC); Lead Left is supporting candidates that Democratic Party leaders

¹⁹ *OTG Media*, Va. State Corp. Comm’n Clerk’s Info. Sys., <https://cis.scc.virginia.gov/EntitySearch/BusinessInformation?businessId=12009271&source=FromEntityResult&isSeries%20=%20false> (last visited May 13, 2026).

²⁰ *See id*; *see also* Lead Left PAC, 24-hour Report, FEC, <https://docquery.fec.gov/pdf/738/202605149866961738/202605149866961738.pdf> (May 14, 2026) (disclosing an additional \$83,450 paid to OTG Media on May 11, 2026).

²¹ *See* IE Reports, *supra* note 8.

²² *See OTG Media*, Va. State Corp. Comm’n Clerk’s Info. Sys., *supra* note 19.

²³ *See Search Disbursements (OTG Media)*, FEC, https://www.fec.gov/data/disbursements/?data_type=processed&recipient_name=OTG+Media&two_year_transaction_period=2026&min_date=01%2F01%2F2025&max_date=12%2F31%2F2026 (last visited May 13, 2026).

²⁴ *Mystery Super PAC Enters Texas Dem Primary*, *Punchbowl News* (May 8, 2026), <https://punchbowl.news/article/house/texas-democratic-primary-super-pac/>.

believe would be less competitive in a general election; and the ads that Lead Left paid to run in Nebraska mirror ads run by AAN, a conservative nonprofit group aligned with Campaign Leadership Fund (CLF), the House GOP leadership’s main super PAC.²⁵

When asked if CLF, a well-known, Republican-aligned super PAC, was behind Lead Left’s spending, a CLF spokesperson declined to answer.²⁶

15. As *Punchbowl* observed, a PAC’s media buyer “is usually a hint into the partisan affiliation of a group because many buyers traditionally work with one party or another. But OTG Media Group is new. It registered just last week,” preventing observers from gleaning any useful information about Lead Left’s partisan affiliation.²⁷
16. *The New York Times* also reported on Lead Left’s election spending and determined that it has “ties to Republicans” and appears to have “spent more than \$1 million meddling in at least three Democratic congressional primaries to select preferred opponents.”²⁸
17. The *Times* further observed that Lead Left’s “spending so far has flowed through limited liability corporations with little disclosure. But Republican fingerprints are detectable.” In addition to noting the apparent links to WinRed in the metadata of Lead Left’s website,²⁹ the *Times* reported that Lead Left’s ads “in Nebraska closely mirror the messaging in ads previously paid for by a nonprofit group that is linked to House Republican leadership, called the American Action Network.”³⁰

²⁵ *See id.*

²⁶ *Id.*; see Shane Goldmacher, *Mysterious Meddling in Democratic Primaries Has G.O.P. Fingerprints*, N.Y. Times (May 12, 2026), <https://www.nytimes.com/2026/05/12/us/politics/gop-mystery-pac-midterms.html>.

²⁷ *Mystery Super PAC Enters Texas Dem Primary*, *supra* note 24.

²⁸ Goldmacher, *supra* note 26.

²⁹ *Id.* (citing *Mystery Super PAC Enters Texas Dem Primary*, *supra* note 24).

³⁰ *Id.*

SUMMARY OF THE LAW

18. Under FECA, if the Commission receives a complaint and determines that there is “reason to believe that a person has committed . . . a violation” of the Act, the Commission “shall make an investigation of such alleged violation.”³¹ The reason-to-believe finding is a threshold determination and “does not establish that the law has been violated.”³² The Commission uses the ensuing investigation “to determine whether a violation in fact occurred and, if so, its exact scope.”³³ Accordingly, the Commission will find reason to believe when the “available evidence” is “sufficient to warrant conducting an investigation, and where the seriousness of the alleged violation warrants” further action.³⁴

Independent Expenditure Reporting

19. FECA requires each treasurer of a political committee to file disclosure reports with the Commission, including regular periodic reports and specialized reports of independent expenditures that cross certain monetary thresholds.³⁵
20. Under FECA, whenever any person, including a political committee, makes or contracts to make independent expenditures “aggregating \$10,000 or more at any time up to and including the 20th day before the date of an election,” they must file a report describing those expenditures within 48 hours.³⁶ Similarly, whenever any person, including a political committee, makes or contracts to make independent expenditures aggregating

³¹ 52 U.S.C. § 30109(a)(2); *see* 11 C.F.R. § 111.10(a).

³² Statement of Policy Regarding Commission Action in Matters at the Initial Stage in the Enforcement Process, 89 Fed. Reg. 19,729, 19,730 (Mar. 20, 2024), https://www.fec.gov/resources/cms-content/documents/fedreg_notice_2024-08.pdf.

³³ *Id.*

³⁴ *Id.*

³⁵ 52 U.S.C. § 30104(a)(1), (g); 11 C.F.R. §§ 104.1(a), 104.4(b)-(c).

³⁶ 52 U.S.C. § 30104(g)(2); 11 C.F.R. § 104.4(b).

\$1,000 or more after the 20th day preceding, but more than 24 hours before, the date of an election, FECA requires them to file a report describing those expenditures within 24 hours.³⁷

21. These 48-hour and 24-hour IE reports must contain the same information that committees are required to include on their periodic reports, including the identity of any person that receives more than \$200 in connection with an independent expenditure.³⁸ Specifically, committees must disclose the name and address of the recipients of their IE spending, along with the date, amount, and purpose of each expenditure.³⁹
22. A committee’s failure to itemize its IE disbursements leaves voters in the dark about the entities working for the committee, including the nature of and charges for the services provided, as well as the overall amount these entities are being paid—which denies voters their informational interest in knowing “where political campaign money comes from and how it is spent,”⁴⁰ and undermines the bedrock transparency necessary for voters to meaningfully evaluate candidates and “make informed decisions.”⁴¹ Failure to completely and accurately report disbursements also undermines compliance with and enforcement of other laws that protect voters and our electoral system, such as the prohibition of coordination between campaigns and outside spending groups—*e.g.*, super PACs and “dark money” 501(c)(4) groups—through common vendors or former employees.⁴²

³⁷ 52 U.S.C. § 30104(g)(1); 11 C.F.R. § 104.4(c).

³⁸ 52 U.S.C. § 30104(g)(3)(B), *cross-referencing id.* § 30104(b)(6)(B)(iii); 11 C.F.R. § 104.4(b)-(c), *cross-referencing id.* § 104.3(b)(3)(vii).

³⁹ 52 U.S.C. § 30104(g)(3)(B), *cross-referencing id.* § 30104(b)(6)(B)(iii); 11 C.F.R. § 104.4(b)-(c), *cross-referencing id.* § 104.3(b)(3)(vii).

⁴⁰ *Buckley v. Valeo*, 424 U.S. 1, 66 (1976).

⁴¹ *Citizens United v. FEC*, 558 U.S. 310, 370 (2010).

⁴² *See* 11 C.F.R. §§ 109.20, 109.21(d)(4), (5).

Reporting Sub-Vendors

23. In Advisory Opinion 1983-25 (Mondale), the Commission determined that a committee need not separately itemize its media vendor's "payments to other persons, which are made to purchase services or products used in performance of [the vendor's] contract with the Committee," *i.e.*, sub-vendor payments.⁴³ The Commission's conclusion turned on several factors about the relationship between the committee and the vendor, including that: (1) the vendor was "separate and distinct" from the committee and did not have overlapping staff; (2) the committee and vendor conducted "arms-length negotiations" for the contract to provide services; and (3) the vendor would "not be required to devote its 'full efforts' to [the committee] and indeed expects to have other [clients]."⁴⁴
24. The Commission has clarified and cabined Advisory Opinion 1983-25 in subsequent enforcement matters, finding that a committee must itemize payments to a sub-vendor when the vendor does not have an "arm's-length" relationship with the committee, when the payments to the sub-vendor are unrelated to the services provided pursuant to the vendor's contract with the committee, and/or when the immediate vendor is merely acting as a "conduit" for disbursements to one or more sub-vendors.⁴⁵
25. In MUR 3874 (Stockman), the Commission found probable cause to believe that Friends of Steve Stockman violated 52 U.S.C. § 30104(b)(5)(a) by failing to itemize disbursements to sub-vendors paid through a vendor, Political Won Stop ("PWS").⁴⁶ PWS was started by a Stockman campaign official and payments from the campaign to

⁴³ Advisory Op. 1983-25 (Mondale) at 2, <https://www.fec.gov/files/legal/aos/1983-25/1983-25.pdf>.

⁴⁴ *Id.* at 3.

⁴⁵ *See infra* ¶¶ 25–27.

⁴⁶ Conciliation Agreement ¶ V.3, MUR 3874 (Stockman) (Jun. 2, 1998), <https://www.fec.gov/files/legal/murs/3847.pdf> (PDF p. 1583).

PWS were “used to pay, inter alia, . . . third-party vendors to carry out services for the campaign.”⁴⁷ The Commission concluded that the campaign and PWS did not have “sufficiently separate and distinct identities to warrant the less detailed type of reporting permitted by the Commission in Advisory Opinion 1983-25,”⁴⁸ particularly because the campaign and PWS were not “conducting their professional relationship at arm’s length,” since one of PWS’s two principals held a position with the campaign and publicly represented himself as a campaign official, and since PWS was devoted largely to the Stockman campaign, working out of its headquarters and using its facilities.⁴⁹

26. In MUR 4872 (Jenkins), the Commission conciliated knowing and willful violations of FECA’s itemized disbursement disclosure requirement.⁵⁰ The violations resulted from a scheme in which candidate Louis E. “Woody” Jenkins and his campaign committee, Jenkins for Senate 1996, made payments through the campaign’s primary media vendor, Courtney Communications, to a different vendor, Impact Mail & Printing—which the campaign hired to perform computerized phone bank services—while disclosing only Courtney Communications as the recipient of these payments on its disclosure reports.⁵¹ Jenkins admitted that he directed the payments to Impact Mail be made through Courtney Communications to avoid public disclosure of his campaign’s association with Impact Mail, which was connected to the well-known white supremacist David Duke.⁵² The

⁴⁷ Gen. Counsel’s Brief at 32–33, MUR 3847 (Stockman) (Sep. 15, 1997) (PDF pp. 1447-48).

⁴⁸ First Gen. Counsel’s Report at 4, MUR 3874 (Stockman) (Jul. 10, 1991) (PDF p. 654).

⁴⁹ *See id.* at 5 (PDF p. 655); Gen. Counsel’s Brief at 34–35, MUR 3874 (Stockman) (PDF pp. 1449-50).

⁵⁰ Conciliation Agreement ¶ V, MUR 4872 (Jenkins for Senate 1996, *et al.*) (Feb. 15, 2002), <https://www.fec.gov/files/legal/murs/4872/0000016F.pdf>.

⁵¹ *Id.* ¶¶ IV.4–IV.7.

⁵² *Id.* ¶ IV.7 (“Jenkins acknowledges that Impact Mail provided the services to the Jenkins Committee . . . [and that] Jenkins decided to make disbursements for the services through Courtney Communications because he did not want his campaign to be associated with Impact Mail and did not want Impact Mail listed on the Jenkins Committee’s disclosure reports.”).

Commission’s conciliation agreement also noted that “Impact Mail was not an ‘ultimate vendor’ or sub vendor of Courtney Communications” because “Courtney had no involvement whatsoever with the services provided by Impact Mail[,] . . . [and, indeed,] Courtney’s only role in this matter was to serve as a conduit for payment to Impact Mail so as to conceal the transaction with Impact Mail.”⁵³

27. In MUR 6724 (Bachmann for President), the Commission found reason to believe that Michelle Bachmann’s campaign committee unlawfully failed to disclose payments to Iowa State Senator Kent Sorenson, ultimately conciliating the violations.⁵⁴ Sorenson and the campaign believed that state law prohibited Sorenson from accepting payments in exchange for supporting Bachmann, so the campaign routed the money through C&M Strategies, Inc. (“C&M”), one of its vendors, to conceal the transactions.⁵⁵ Finding that Sorenson “did not take direction from or perform any work for C&M,” and C&M did not exercise any control over the funds that were earmarked for Sorenson, the Commission concluded that Sorenson could not be classified as C&M’s sub-vendor.⁵⁶ Therefore, Sorenson should have been disclosed as the ultimate payee.⁵⁷ The Office of General Counsel also noted in its analysis that: (1) C&M’s only principal held an official position with the campaign and worked out of the campaign headquarters; (2) C&M dedicated all its resources to Bachmann’s campaign and leadership committee; and (3) given those

⁵³ *Id.* ¶ IV.9.

⁵⁴ *See* Conciliation Agreement ¶ V, MUR 6724 (Bachmann for President), <https://www.fec.gov/files/legal/murs/6724/17044423200.pdf> (July 27, 2017).

⁵⁵ *Id.* ¶ IV.3.

⁵⁶ *Id.* ¶¶ IV.4–IV.5.

⁵⁷ *Id.* ¶ V; *see also* Factual and Legal Analysis at 8–10, MUR 6800 (Ron Paul 2012 Presidential Campaign Comm., Inc.) (Jun. 30, 2016), https://www.fec.gov/files/legal/murs/6800/6800_18.pdf (finding reason to believe that Ron Paul’s presidential campaign committee knowingly and willfully violated 52 U.S.C. § 30104(b)(5)(a) by paying Iowa State Senator Kent Sorenson for his endorsement using a vendor as an intermediary to disguise the payments).

factors, there did not appear to be an arm’s length relationship between the campaign and C&M—meaning that C&M was not the ultimate payee under the Mondale factors.⁵⁸

CAUSE OF ACTION

COUNT I: LEAD LEFT PAC VIOLATED 52 U.S.C. § 30104(B)(5)(A) BY FAILING TO REPORT THE ULTIMATE PAYEES OF ITS EXPENDITURES ATTRIBUTED TO PIRUZI LLC AND OTG MEDIA LLC

28. Applying the three factors that the Commission outlined in Advisory Opinion 1983-25 (Mondale) and explicated in subsequent matters, there is reason to believe Lead Left violated FECA by reporting payments to Piruzi and OTG Media without itemizing those entities’ payments to sub-vendors, who were the ultimate recipients of the super PAC’s funds. These LLCs were not “separate and distinct” entities operating at arm’s length, and each LLC appears to have “devote[d] its ‘full efforts’ to” Lead Left with no plan or intention to take on any further clients.⁵⁹ Moreover, the reported use of these opaque LLCs to make over \$2.4 million in IEs within days or weeks after their formation belies the notion that the LLCs were, in fact, the entities actually providing the reported services⁶⁰—and indicates instead that the LLCs were actually serving as mere payment

⁵⁸ See First Gen. Counsel’s Report at 14–16, MUR 6724 (Bachmann for President) (Aug. 26, 2014), <https://www.fec.gov/files/legal/murs/6724/17044423059.pdf>. Notwithstanding these precedents, three commissioners voted to dismiss a sub-vendor reporting complaint in MUR 7784, based, among other reasons, on the legally flawed view that sub-vendor reporting is required only where the “immediate recipient [of funds] is merely a conduit for the intended recipient of the funds.” Statement of Reasons of Chairman Allen J. Dickerson & Comm’rs Sean J. Cooksey & James E. “Trey” Trainor at 5, MUR 7784 (MAGA PAC) (Jun. 9, 2022), https://www.fec.gov/files/legal/murs/7784/7784_42.pdf (quoting MUR 6724 (Bachmann for President)). The three commissioners also errantly claimed that Campaign Legal Center’s pending rulemaking petition—which seeks to expand the sub-vendor reporting requirement to cover situations *not already covered* by the existing rule—indicated an “uncertain” “regulatory environment” regarding the reporting of ultimate payees. See *id.* at 12; see also *FEC Rulemaking Petition on Transparency for Political Spending*, CLC (Jun. 29, 2021), <https://campaignlegal.org/document/fec-rulemaking-petition-transparency-political-spending>. The Commission’s dismissal of MUR 7784 is the subject of ongoing litigation. See *Campaign Legal Ctr. v. FEC*, No. 22-5339 (D.C. Cir.) (appeal filed Dec. 21, 2022).

⁵⁹ See Advisory Op. 1983-25 at 3.

⁶⁰ See *supra* ¶ 7.

clearinghouses for Lead Left to obscure the actual persons providing it with mail and media services. Accordingly, there is reason to believe Lead Left violated FECA by failing to itemize sub-vendor payments made through these LLCs, as required.

29. Lead Left and Piruzi were not only formed at around the same time, they also appear to have overlapping staff and facilities, such that they cannot reasonably be considered “separate and distinct” entities with an arm’s length commercial relationship.⁶¹ Piruzi was organized just two weeks before Lead Left registered as a super PAC, and the LLC was incorporated by Tammie Cannon, who serves as Lead Left’s treasurer.⁶² In multiple IE reports, Lead Left reported Piruzi’s address as “2241 North Monroe Street #1447, Tallahassee, FL 32303,” which is Lead Left’s reported address as disclosed on its registration paperwork on file with the FEC.⁶³ The fact that the super PAC and the LLC share an address and have at least one agent in common points to the inescapable conclusion that Piruzi is not a separate and distinct entity, but is instead merely a shell company established solely to service the super PAC as a payment clearinghouse. Indeed, as Cannon is affiliated with both Lead Left and Piruzi, the two could not reasonably have negotiated an arm’s length business arrangement for the LLC to provide the super PAC with over \$800,000 in services for media production and placement, printing, and postage.⁶⁴
30. Moreover, Piruzi appears to have neither obtained nor sought any other clients. No other federal political committee has reported paying Piruzi, and it appears to have no online or physical presence: it has no known website, social media pages, or advertising, and its

⁶¹ See Advisory Op. 1983-25 at 3.

⁶² See *supra* ¶ 8.

⁶³ See *supra* ¶ 9.

⁶⁴ See *supra* ¶¶ 8–9.

only physical location—aside from the address it shares with Lead Left—is a virtual mailbox.⁶⁵ There is thus no basis to conclude that Piruzi has ever sought or plans to seek to provide services for any clients aside from Lead Left.

31. The fact that Lead Left and Piruzi have a common organizer and address, viewed alongside the rapid sequence of events that led this newly formed LLC to receive over \$800,000 to purportedly provide media services to a newly formed political committee, indicates that Piruzi was not, in fact, the true and ultimate recipient of these funds to provide such services (just as, conversely, Lead Left was not the original source of the funds to procure the services, but was indeed a pop-up entity established to conceal the true sources⁶⁶). Accordingly, these factual elements provide reason to believe that Lead Left violated its reporting obligations when it failed to disclose the true recipients—*i.e.*, the ultimate payees—of over \$800,000 that it spent to procure advertising services.⁶⁷
32. Similarly, OTG Media appears to have been formed at almost the exact same time as Lead Left, and has no other current or prospective clients, yet it has reportedly received over \$1.6 million to service Lead Left’s media production and placement efforts—a rapid-fire series of events that is simply not credible and instead strongly indicates that OTG Media is likewise acting as a mere shell entity to conceal the true recipients of these funds, who are actually providing the reported services to the super PAC.⁶⁸ Reporting an established media buyer, rather than OTG Media, would likely have provided a “hint into

⁶⁵ See *supra* ¶¶ 9–10.

⁶⁶ See *supra* note 9 and associated text.

⁶⁷ See 52 U.S.C. § 30104(g)(3)(B), *cross-referencing id.* § 30104(b)(6)(B)(iii); 11 C.F.R. § 104.4(b)-(c), *cross-referencing id.* § 104.3(b)(3)(vii); Advisory Op. 1983-25 at 3.

⁶⁸ See *supra* ¶¶ 11–13.

the partisan affiliation of’ Lead Left, which would have undermined its apparent goal of masquerading as a Democratic super PAC.⁶⁹

33. OTG Media was formed on April 29, 2026—just *five days* after Lead Left registered as a super PAC.⁷⁰ Nevertheless, within merely a week of being formed, OTG Media began receiving six-figure IEs—over \$600,000 on May 5, 2026, alone—from Lead Left for media production and placement.⁷¹ To date, it has reportedly received \$1,613,810 in IEs from Lead Left, while no other federal committee has ever reported paying OTG Media.⁷²
34. OTG Media also does not appear to be seeking any other clients: like Piruzi, it has no apparent website, social media pages, or advertising, and its physical location—if it has one—is unknown; its reported address on Lead Left’s IE reports is that of its generic corporate registered agent.⁷³ As such, there is ample factual basis to find reason to believe OTG Media is likewise not a separate and distinct entity operating at arm’s length from its sole client, Lead Left, and is instead effectively an arm of the super PAC that devotes its full efforts to serving as a payment clearinghouse for the super PAC’s IE spending on the 2026 midterm elections.⁷⁴
35. Accordingly, there is reason to believe that Lead Left has violated, and continues to violate, 52 U.S.C. § 30104(b)(5)(A) by failing to report the ultimate payees of its disbursements attributed to Piruzi and OTG Media, thereby denying the public important information about how money is being spent to influence their votes.

⁶⁹ See *Mystery Super PAC Enters Texas Dem Primary*, *supra* note 24.

⁷⁰ See *supra* ¶ 11.

⁷¹ See IE Reports, *supra* note 8.

⁷² See *supra* ¶¶ 12–13.

⁷³ *Id.*

⁷⁴ See Advisory Op. 1983-25 at 3.

PRAYER FOR RELIEF

36. Wherefore, the Commission should find reason to believe that Lead Left PAC and Tammie Cannon in her official capacity as treasurer violated 52 U.S.C. § 30101 *et seq.*, and conduct an immediate investigation under 52 U.S.C. § 30109(a)(2).
37. Further, the Commission should seek appropriate sanctions for any and all violations, including civil penalties sufficient to deter future violations and an injunction prohibiting the respondents from any and all violations in the future, and should seek such additional remedies as are necessary and appropriate to ensure compliance with FECA.

Respectfully submitted,

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May 14, 2026

VERIFICATION

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

Sworn pursuant to 18 U.S.C. § 1001.

For Complainant Sophia Gonsalves-Brown

Sophia Gonsalves-Brown

Sophia Gonsalves-Brown

Sworn to and subscribed before me this 14th day of May 2026.



Notary Public

Commonwealth of Pennsylvania - Notary Seal
Cassandra L Bryant, Notary Public
Philadelphia County
My commission expires February 23, 2028
Commission Number 1443740

Notarized remotely online using communication technology via Proof.

VERIFICATION

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

Sworn pursuant to 18 U.S.C. § 1001.

For Complainant Campaign Legal Center

Saurav Ghosh

Saurav Ghosh, Esq.

Sworn to and subscribed before me this 14th day of May 2026.

Angel Urbaez

Notary Public
Angel Manuel Urbaez

Commonwealth of Pennsylvania - Notary Seal
Angel Manuel Urbaez, Notary Public
Northampton County
My commission expires January 8, 2030
Commission Number 1466185

Notarized remotely online using communication technology via Proof.