

**BEFORE THE FEDERAL ELECTION COMMISSION**

COOLIDGE-REAGAN FOUNDATION  
1629 K Street, N.W., Suite 300  
Washington, D.C. 20006

*Complainant,*

v.

ALEXANDRIA OCASIO-CORTEZ  
FEC ID Number H8NY15148  
P.O. Box 680080  
Corona, NY 11368,

ALEXANDRIA OCASIO-CORTEZ  
FOR CONGRESS  
P.O. Box 680080  
Corona, NY 11368  
Frank Llewellyn, Treasurer

BRAND NEW CONGRESS  
2930 Wesley Avenue  
Charlotte, NC 28205  
Isra Allison, Treasurer

*Respondents.*

**VERIFIED COMPLAINT**

**Introduction**

This Complaint alleges Alexandria Ocasio-Cortez funneled thousands of dollars of official campaign funds through Brand New Congress—a limited liability corporation and affiliated PAC—to her boyfriend. Reason to believe exists both the transaction, as well as the involved entities’ reporting of it, may have violated federal law.

**PARTIES**

1. Complainant COOLIDGE-REAGAN FOUNDATION is a non-connected hybrid political committee registered with the Federal Election Commission (“FEC”).

2. Respondent ALEXANDRIA OCASIO-CORTEZ was a candidate for Congress in 2018, and currently serves as a Member of Congress from New York’s 14th Congressional District.

3. Respondent ALEXANDRIA OCASIO-CORTEZ FOR CONGRESS is Alexandria Ocasio-Cortez’s authorized candidate committee.

4. Respondent BRAND NEW CONGRESS (hereafter, “Brand New Congress PAC”) is a nonqualified, unauthorized political committee (“PAC”).

### **RELEVANT CAMPAIGN FINANCE LAWS**

5. 52 U.S.C. § 30114(b)(1) provides campaign contributions “shall not be converted by any person to personal use.”

6. 52 U.S.C. § 30104(b)(6) provides an authorized committee must report “the name and address of each person who has received any disbursement not disclosed” as an expenditure, if it totals more than \$200 within an election cycle.

### **REASON TO BELIEVE EXISTS ALEXANDRIA OCASIO-CORTEZ LAUNDERED MONEY THROUGH A PAC TO PROVIDE CAMPAIGN FUNDS TO HER BOYFRIEND**

7. On February 20, 2019, Luke Thompson published an article entitled “The Congresswoman Loves the Swamp. Her Wealthy Chief of Staff Used a PAC to Pay Her Boyfriend,” on Medium, which parses FEC records to reveal evidence Ocasio-Cortez funneled money from her official campaign account to her boyfriend, Riley Roberts. <https://medium.com/@ltthomps/the-congresswoman-loves-the-swamp-d33296ec251e>.

8. The Chief of Staff of Ocasio-Cortez’s congressional office, Saikat Chakrabarti, founded Brand New Congress PAC and Brand New Congress LLC in 2016. He operated Brand New Congress PAC through approximately August 2017. It appears he no longer operates Brand New Congress LLC, either.

9. On August 9, 2017, Brand New Congress PAC paid Ocasio-Cortez’s boyfriend, Riley Roberts, \$3,000. The description of the payment specifies only “marketing consultant.”

10. Less than three weeks later, on August 27th, 2017, Cortez’s campaign committee paid Brand New Congress LLC \$6,191.32 for “strategic consulting.”

11. Ocasio-Cortez’s campaign committee—which operated under the name Alexandria Ocasio-Cortez 2018 at the time—reported the transaction on Page 20 of its October Quarterly 2017 report to the FEC, filed on October 14, 2017 and amended on April 13, 2018. It is available at: <http://docquery.fec.gov/pdf/150/201804139108015150/201804139108015150.pdf>.

12. The following month, Brand New Congress PAC paid Cortez’s boyfriend, Roberts, another \$3,000, again with the description “marketing consultant.”

13. Brand New Congress PAC reported both of its payments to Roberts on Page 1,211 of its Year-End 2017 report to the FEC, filed on January 31, 2018. It is available at <http://docquery.fec.gov/pdf/370/201801319091223370/201801319091223370.pdf>.

14. Thus, over the span of a little more than a month, Cortez’s campaign committee paid just over \$6,000 to Brand New Congress PAC, while its affiliated LLC turned around and paid her boyfriend \$6,000.

15. Ocasio-Cortez subsequently hired Chakrabarti, who created the entities which conducted these transactions and facilitated the transfer of Ocasio-Cortez’s official campaign funds to her boyfriend, as the Chief of Staff of her congressional office.

16. The timing and amounts of these transactions, the use of two affiliated entities as intermediaries, the vague and amorphous nature of the services Riley ostensibly provided, the magnitude of these transactions compared to both the limited funds the campaign had raised at the time and the total amount of its expenditures, and the romantic relationship between Ocasio-Cortez

and Riley collectively establish reason to believe these transactions may have violated campaign finance law.

**CAUSES OF ACTION**

**COUNT I – AGAINST ALL RESPONDENTS**  
**Personal Use of Campaign Funds in Violation of 52 U.S.C. § 30114(b)(1)**

17. Complainant hereby re-alleges and incorporates by reference the preceding paragraphs as if fully set forth herein.

18. Ocasio-Cortez converted official funds raised through contributions to her candidate committee to personal use by transferring a total of \$6,191.32 from her campaign committee to Brand New Congress PAC in late August and September 2017, which contemporaneously had its affiliated LLC pay \$6,000 to her boyfriend, Riley.

19. On information and belief, the amount paid to Riley was either not provided as consideration for bona fide services or exceeded the fair market value of any legitimate services Riley provided. On information and belief, the true intent of the payment to Riley was to provide personal benefit to a boyfriend, rather than defray bona fide campaign expenses.

WHEREFORE, reason exists to conclude Respondents violated 52 U.S.C. § 30114(b)(1).

**COUNT II – AGAINST RESPONDENTS ALEXANDRIA OCASIO-CORTEZ AND**  
**ALEXANDRIA OCASIO-CORTEZ FOR CONGRESS**  
**False Reporting in Violation of 52 U.S.C. § 30104(b)(6)**

20. Complainant hereby re-alleges and incorporates by reference the preceding paragraphs as if fully set forth herein.

21. In an attempt to mask the payment of official campaign funds to her boyfriend, Ocasio-Cortez instead laundered them through intermediaries Brand New Congress PAC and Brand New Congress LLC.

22. Ocasio-Cortez incorrectly reported a payment of \$6,191.32 to Brand New Congress LLC on August 27, 2017, for strategic consulting, rather than correctly characterizing the underlying payment of \$6,000 to Robert Riley.

WHEREFORE, Respondents Alexandria Ocasio-Cortez and Alexandria Ocasio-Cortez for Congress violated 52 U.S.C. § 30104(b)(6).

### **CONCLUSION**

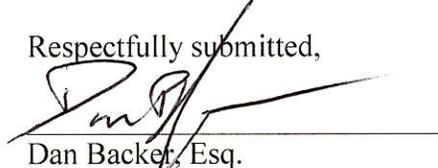
For these reasons, Complainant Coolidge-Reagan Foundation respectfully requests the Federal Election Commission commence enforcement proceedings against Respondent.

**VERIFICATION**

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

Dated February 27, 2019

Respectfully submitted,



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*Counsel for Complainant Coolidge-Reagan Foundation*

COMPLETED BEFORE A NOTARY PUBLIC

State of – Virginia

City of – Alexandria

County of –

Subscribed and sworn to before me on this 27 day of February, 2019.

**MEGAN MARIE HERGETT**  
NOTARY PUBLIC  
REG. #7783266  
COMMONWEALTH OF VIRGINIA  
MY COMMISSION EXPIRES MARCH 31, 2022

My Commission expires on 3-31-2022.

