



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

April 16, 2025

ADVISORY OPINION 2025-06

Mr. Saurav Ghosh
Ms. Shanna Ports
Campaign Legal Center
1101 14th Street, NW
Suite 400
Washington, DC 20005

Dear Mr. Ghosh and Ms. Ports:

We are responding to your request on behalf of Campaign Legal Center (the “Requestor”) regarding the application of the Federal Election Campaign Act, 52 U.S.C. §§ 30101-45 (the “Act”), and Commission regulations to the Requestor’s plan to file a complaint with the Commission. The Commission concludes that the Requestor may file a complaint with the Commission pursuant to 52 U.S.C. § 30109(a)(1) if it believes a violation of the Act has occurred.

Background and Question Presented

The facts presented in this advisory opinion are based on your advisory opinion request received on March 25, 2025.

The Requestor states that it intends to file a complaint with the Commission alleging violations of the Act.¹ The Requestor asks whether 52 U.S.C. § 30109(a)(1) “permits” it to file the proposed complaint.²

Legal Analysis

Section 30109(a)(1) states that “any person who believes a violation of [the Act] has occurred” may file a complaint with the Commission. Thus, under the terms of this provision of

¹ AOR002.

² *Id.*

the Act, the Requestor may file a complaint with the Commission if it believes a violation of the Act has occurred.³

This response constitutes an advisory opinion concerning the application of the Act and Commission regulations to the specific transaction or activity set forth in your request.⁴ This response does not address the substance of the Requestor's proposed complaint or the potential application of any executive orders, the authority of any Executive Branch official or agency, or other matters not within the Commission's jurisdiction.

The Commission emphasizes that, if there is a change in any of the facts or assumptions presented, and such facts or assumptions are material to a conclusion presented in this advisory opinion, then the Requestor may not rely on that conclusion as support for its proposed activity. Any person involved in any specific transaction or activity which is indistinguishable in all its material aspects from the transaction or activity with respect to which this advisory opinion is rendered may rely on this advisory opinion.⁵ Please note that the analysis or conclusions in this advisory opinion may be affected by subsequent developments in the law including, but not limited to, statutes, regulations, advisory opinions, and case law. Any advisory opinions cited herein are available on the Commission's website.

On behalf of the Commission,

A handwritten signature in black ink that reads "James E. Trainor, III". The signature is written in a cursive style with a large, stylized "J" and "T".

James E. "Trey" Trainor III
Acting Chairman

³ See 52 U.S.C. § 30101(11) (defining "person"). For information about the technical requirements for complaints, *see id.* § 30109(a)(1) and 11 C.F.R. § 111.4.

⁴ See 52 U.S.C. § 30108.

⁵ See *id.* § 30108(c)(1)(B).