

APRIL 20, 2022 4:52 PM

OFFICE OF GENERAL COUNSEL

## BEFORE THE FEDERAL ELECTION COMMISSION

Evan Albertson

Kyle, Texas 78640

**MUR 7983**

v.

Francisco ("Frank") Lopez, Jr.  
P.O. Box 420575  
Del Rio, TX 78842**COMPLAINT**

1. This complaint is filed pursuant to 52 U.S.C. § 30109(a)(1) and is based on clear reason to believe that Francisco ("Frank") Lopez, Jr. (ID H2TX23165) is running an illegal dark money campaign for Congress.
2. Specifically, Mr. Lopez has violated 52 U.S.C. § 30104 and 11 C.F.R. § 104.5 by failing to disclose vital information about the sources of his campaign contributions and campaign spending.
3. These brazen violations are keeping voters in the dark about who is behind Mr. Lopez's candidacy and the interests he represents. These violations go to the heart of the federal campaign finance laws and the Federal Election Commission's ("FEC") function as a disclosure agency.
4. We demand an immediate review and appropriate sanctions in this matter. Since these violations are clear on their face, no investigation is needed.
5. Congressional candidates are required to file quarterly reports to disclose who is funding their campaigns and how they are spending that money.<sup>1</sup>
6. On January 6, 2022, Mr. Lopez filed a Statement of Candidacy (FEC Form 2)<sup>2</sup> and Statement of Organization (FEC Form 1)<sup>3</sup> for his campaign committee, "GrassTroops for Frank Lopez Jr."
7. Mr. Lopez' campaign was required to file a quarterly report no later than April 15, 2022.<sup>4</sup> To date, according to the FEC's website, it has not yet done so:

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<sup>1</sup> 52 U.S.C. § 30104; 11 C.F.R. § 104.5.

<sup>2</sup> <https://docquery.fec.gov/cgi-bin/forms/H2TX23165/1554540/>

<sup>3</sup> <https://docquery.fec.gov/cgi-bin/forms/C00799601/1554566/>

<sup>4</sup>

<https://www.fec.gov/help-candidates-and-committees/dates-and-deadlines/2022-reporting-dates/2022-quarterly-filers/>

**GRASSTROOPS FOR FRANK LOPEZ JR**

ACTIVE - QUARTERLY | HOUSE | ID: C00796601 | REGISTRATION DATE: JANUARY 06, 2022

## FINANCIAL SUMMARY

## ABOUT THIS COMMITTEE

## RAISING

## SPENDING

## FILINGS

## Regularly filed reports

## 24- and 48-hour reports

## Statements of organization

## Other documents

**Committee filings**

## TWO-YEAR PERIOD

2021-2022

**Regularly filed reports**

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8. Mr. Lopez's violation frustrates the important interests of the disclosure requirements to inform voters, deter corruption and the appearance of corruption, and to detect other campaign contribution and spending violations.<sup>5</sup>

9. Mr. Lopez's failure to disclose his campaign funding and spending is leaving voters in the dark and wondering: What is he hiding?

10. Mr. Lopez's failure to report his campaign finances is a clear violation of federal law. The FEC must take immediate action to compel Mr. Lopez to follow the law and impose appropriate sanctions.

Sincerely,

Evan Albertson

April 20, 2022

<sup>5</sup> *Buckley v. Valeo*, 424 U.S. 1, 66-68 (1976).

**VERIFICATION**

The complainant listed below hereby verifies that the statements made in the attached Complaint are, upon his information and belief, true.

Sworn to pursuant to 18 U.S.C. § 1001.

  
Evan Albertson

Sworn to and subscribed before me this 20 day of April, 2022.

  
Notary Public

