

OFFICE OF
GENERAL COUNSELBEFORE THE
FEDERAL ELECTION COMMISSION

2023 APR 12 PM 12:19

COMMITTEE TO DEFEAT THE
PRESIDENT
441 North Lee Street, Suite 205
Alexandria, VA 22314
Chairman, Ted Harvey

Complainant,

v.

DCCC
430 South Capitol Street, SE
2nd Floor
Washington, DC 20003-4024

TIMOTHY PERSICO
In his official capacity as Treasurer of DCCC
430 South Capitol Street, SE
2nd Floor
Washington, DC 20003-4024, and

ELIAS LAW GROUP LLP
10 G Street NE
Suite 600
Washington, DC 20002-4253

*Respondents.*MUR # 8125**VERIFIED COMPLAINT****Introduction**

The Democratic Congressional Campaign Committee (“DCCC”) is a political committee dedicated to electing democratic candidates to the House of Representatives.¹ A review of the DCCC’s recent FEC reports reveals disbursements totaling \$12,533,653.23 to the Elias Law Group between January 1, 2021, and December 31, 2022, for “RECOUNT LEGAL SVCS.” The DCCC

¹ <https://dccc.org/>.

also paid the Elias Law Group an additional \$1,004,002.71 over that same period for “legal services rendered” and “headquarters legal services.”

The DCCC made a total of \$5,177,460.62 of these ostensibly recount-related payments to the Elias Law Group between October 19, 2021, and July 15, 2022—while no general election recounts were pending and substantially in advance of the November 2022 general election. Such payments apparently did not lead the DCCC or Elias Law Group to be prepared for any recounts, however. Following July 15, 2022, the DCCC paid the Elias Law Group an additional \$7.3 million for “RECOUNT LEGAL SVCS” to prepare for potential recounts in the months before the 2022 general election, monitor the conduct of the election during the voting period, and handle post-election disputes following the election.

It is highly unlikely the \$5.2 million the DCCC paid to the Elias Law Group starting on October 19, 2021 actually was for recount-related services, as there were no federal recounts pending at that time, the general election was over a year away, even the nearest congressional primary (in which the DCCC ostensibly remains neutral and uninvolved) was nearly a half-year away, and the DCCC would go on to spend an additional \$7.3 million on recount-related services from the Elias Law Group in the months leading up to the November 2022 election and its aftermath. The more likely explanation is the DCCC, with the cooperation of the Elias Law Group, misreported the purpose of some or all of this \$5.2 million in payments to the Elias Law Group to shield their activities from public scrutiny.

Such fraudulent representations are particularly likely to have occurred since the Elias Law Group’s name partner, Marc Elias, has a history of lack of candor and has been sanctioned for such conduct by a federal Court of Appeals. *See Order, Texas Alliance for Retired Ams. v. Hughes,*

No. 20-40643 (5th Cir. Mar. 11, 2021).² Moreover, the FEC recently executed conciliation agreements concerning another Democratic national party committee's materially false descriptions of Elias' services to hide from public scrutiny his role in compiling the salacious, false Steele Dossier, which Democratic operatives used to attempt to steal the 2016 election. *See In re DNC Services Corp. / Democratic Nat'l Comm.*, MUR 7449 (Aug. 8, 2018).³ Upon information and belief, the DCCC is continuing to fund Elias' unscrupulous activities under the false and implausible guise of recount-related legal services. Complainant Committee to Defeat the President respectfully requests the FEC open an investigation and commence enforcement proceedings against Respondents to uncover the truth about the DCCC's nearly \$5.2 million in payments to the Elias Law Group, and the firm's role in facilitating such false reporting.

Parties

1. Complainant COMMITTEE TO DEFEAT THE PRESIDENT (FEC ID #: C00544767) is a political committee on a mission to save America from the radical, dangerous policies of the Biden-Harris administration.
2. Respondent DCCC (FEC ID #: C00000935) is a national committee of the Democratic Party.
3. Respondent, Timothy Persico, is named solely in his official capacity as Treasurer of DCCC (hereinafter referred to as "Treasurer Persico").
4. Respondent Elias Law Group LLP is a Washington, D.C. limited liability partnership.

² <https://www.texasattorneygeneral.gov/sites/default/files/images/admin/2021/Press/Sanctions.pdf>

³ https://www.fec.gov/files/legal/murs/7449/7449_64.pdf.

Statement of Facts

5. All political committees are required to file truthful financial disclosure reports with the FEC, including FEC Form 3x (Report of Receipts and Disbursements).
6. The DCCC's FEC financial summary for January 1, 2021 – December 31, 2022 includes a total of \$1,004,002.71 in payments for “legal services rendered” and “headquarters legal services” to Elias Law Group LLP under “other federal operating expenditures” (Line 21b of FEC Form 3x).⁴
7. The DCCC's FEC financial summary for January 1, 2021 – December 31, 2022 includes a total of \$12,533,653.23 in payments for “RECOUNT LEGAL SVCS” to Elias Law Group LLP under “other disbursements” (Line 29 of FEC Form 3x).⁵
8. Upon information and belief, between January 1, 2021 and the November 2022 general election, there had been only one challenge in a federal general election that involved a partial recount, and it ended in early February 2021.⁶
9. Upon information and belief, the DCCC generally remains neutral and does not take sides in contested primaries, including subsequent recounts and election contests. The DCCC generally does not provide or pay for legal representation for particular Democratic candidates in connection with recounts in primary elections. Few, if any, of the DCCC's payments to Elias Law Group for RECOUNT LEGAL SVCS are related to primary election recounts.

⁴A true and accurate copy of an FEC search for distributions to Elias Law Group LLP under “other federal operating expenditures” (Line 21b of FEC Form 3x) is attached hereto as **Exhibit A**.

⁵A true and accurate copy of an FEC search for distributions to Elias Law Group LLP under “other disbursements” (Line 29 of FEC Form 3x) is attached hereto as **Exhibit B**.

⁶ <https://www.syracuse.com/politics/2020/12/judge-orders-partial-recount-in-brindisi-tenney-house-race.html>.

10. The DCCC did not report any recount-related disbursements to Elias Law Group LLP between January 1, 2021 and September 1, 2021.

11. The DCCC reported making numerous payments for RECOUNT LEGAL SVCS to Elias Law Group LLP while no elections or recounts relating to federal general elections were ongoing or impending:

a. The DCCC reported making six separate payments on October 19, 2021, to Elias Law Group LLP for “RECOUNT LEGAL SVCS” totaling \$264,245.50—more than ten months following the 2020 election and over a year before the 2022 election.

b. The DCCC reported making six separate payments on November 22, 2021, to Elias Law Group LLP for “RECOUNT LEGAL SVCS” totaling \$273,173.10.

c. The DCCC reported making ten separate payments on December 17, 2021, to Elias Law Group LLP for “RECOUNT LEGAL SVCS” totaling \$385,237.18.

d. The DCCC reported making one payment on February 4, 2022, to Elias Law Group LLP for “RECOUNT LEGAL SVCS” totaling \$3,780.

e. The DCCC reported making nine separate payments on February 18, 2022, to Elias Law Group LLP for “RECOUNT LEGAL SVCS” totaling \$352,693.00.

f. The DCCC reported making eleven separate payments on March 4, 2022, to Elias Law Group LLP for “RECOUNT LEGAL SVCS” totaling \$397,447.59.

g. The DCCC reported making eight separate payments on April 14, 2022, to Elias Law Group LLP for “RECOUNT LEGAL SVCS” totaling \$533,045.05.

h. The DCCC reported making thirteen separate payments on May 13, 2022, to Elias Law Group LLP for “RECOUNT LEGAL SVCS” totaling \$736,869.81.

- i. The DCCC reported making fourteen separate payments on June 23, 2022, to Elias Law Group LLP for “RECOUNT LEGAL SVCS” totaling \$1,036,940.62.
 - j. The DCCC reported making eleven separate payments on July 15, 2022, to Elias Law Group LLP for “RECOUNT LEGAL SVCS” totaling \$1,194,028.77.
12. The DCCC reported making a **total** of \$5,177,460.62 in payments between October 19, 2021, and July 15, 2022, to Elias Law Group for “RECOUNT LEGAL SVCS,” despite the absence of any pending recounts in federal general elections. These payments are the gravamen of this complaint.
13. The DCCC’s payment of over \$5 million to Elias Law Group between October 19, 2021, and July 15, 2022, is even less credibly for “RECOUNT LEGAL SVCS,” given the DCCC subsequently paid the firm over \$7.3 million for such services in connection with the 2022 election:
- a. The DCCC reported making a total of \$3,194,967.49 in additional payments between August 1, 2022, and November 8, 2022 (the general election), to Elias Law Group for “RECOUNT LEGAL SVCS.” Though exorbitant, such payments might be attributed to preliminary legal research and preparation for potential recounts in connection with the 2022 general election.
 - b. The DCCC reported making a total of \$4,161,225.12 in additional payments between November 9, 2022 and December 31, 2022 to Elias Law Group for “RECOUNT LEGAL SVCS.” Though exorbitant, such payments might be attributed to legal research and representation in recounts arising from the 2022 general election.
14. Thus, it is unclear how the DCCC could have paid the Elias Law Group over \$5 million for recount legal services between October 2021 and July 2022, when no recounts related to a general election were pending, particularly since the DCCC would go on to pay over \$7.2 million

for recount legal services in the months before the general election, while the election was pending, and in its aftermath.

15. Marc Elias is the name partner of Elias Law Group LLP.

16. Marc Elias has previously been sanctioned by the United States Court of Appeals for the Fifth Circuit for lack of candor. *See Order, Texas Alliance for Retired Ams. v. Hughs*, No. 20-40643 (5th Cir. Mar. 11, 2021).⁷ Another federal court accused him of attempting to “impinge[]” upon “free, open, rational elections.” Bill Mahoney, *Judge Mocks New York Democrats’ Redistricting “Hail Mary” Case*, POLITICO (May 4, 2022).⁸

17. Marc Elias was also the architect of the unlawful financing of the “Steele Dossier.” Elias, through his then-law firm Perkins Coie, hired opposition research firm Fusion GPS, which in turn hired former British spy Christopher Steele to conduct opposition research on Donald Trump. Steele’s research, secretly funded by Perkins Coie, led to the infamous, salacious, and materially false “Steele dossier.” *See* Kenneth P. Vogel, *Clinton Campaign and Democratic Party Helped Pay for Russia Trump Dossier*, N.Y. TIMES (Oct. 24, 2017).⁹ The dossier included false documents accusing Trump of colluding with Russian operatives (the “Elias Russia Hoax”). *See* Marshall Cohen, *FBI Offered Christopher Steele \$1 Million to Prove Dossier Claims, Senior FBI Analyst Testifies*, CNN (Oct. 14, 2022).¹⁰

18. The Democratic National Committee and Hillary for America entered into a Conciliation Agreement with the FEC after falsely reporting the purpose of payments to Perkins Coie LLP

⁷ <https://www.texasattorneygeneral.gov/sites/default/files/images/admin/2021/Press/Sanctions.pdf>

⁸ <https://www.politico.com/news/2022/05/04/new-york-judge-democrats-redistricting-00030015>

⁹ <https://www.nytimes.com/2017/10/24/us/politics/clinton-dnc-russia-dossier.html>.

¹⁰ <https://www.cnn.com/2022/10/11/politics/steele-dossier-fbi-durham-danchenko/index.html>

(Mark Elias' firm at the time) as being for legal work, when in fact the payments were made in connection with the Steele Dossier. *See In re DNC Services Corp. / Democratic Nat'l Comm.*, MUR 7449 (Aug. 8, 2018).¹¹

19. Based on Marc Elias' history of lack of candor, false reporting of expenses related to the Steele Dossier to promulgate the Elias Russia Hoax, and the improbability that the Elias Law Group provided \$5 million in recount-related services starting more than a year before the 2022 general election, Marc Elias and his law firm should not be taken at their word.

20. It is more probable the \$5,177,460.62 in payments the DCCC disbursed between October 19, 2021, and July 15, 2022 to Elias Law Group were for something other than "RECOUNT LEGAL SVCS"—something neither the DCCC nor Elias Law Group wish the FEC or the public to know about.

21. Thus, upon information and belief, Respondents have misrepresented the purpose of over \$5 million in disbursements to Elias Law Group in public reports to the FEC.

22. The DCCC did not specify whether these payments to the Elias Law Group came from its general treasury account, or its separate segregated recount account established pursuant to 52 U.S.C. § 30116(a)(9)(C).

23. The DCCC reported all of its \$5,177,460.62 in payments between October 19, 2021, and July 15, 2022, to Elias Law Group on line 29 of its Form 3X. That is consistent with the FEC's guidance as to how national party committees should report disbursements from their separate segregated accounts. *See FEC, National Party Accounts for Certain Expenses.*¹²

¹¹ https://www.fec.gov/files/legal/murs/7449/7449_64.pdf.

¹² <https://www.fec.gov/help-candidates-and-committees/registering-political-party/national-party-accounts-certain-expenses/>.

24. Based on the DCCC's disclosures, it is reasonably likely its payments purportedly for "RECOUNT LEGAL SVCS" to Elias Law Group were drawn from its separate segregated recount account. To the extent the DCCC's description of the purpose of those disbursements was false, such circumstances would suggest any such disbursements from the DCCC's separate segregated recount account were not for a legally permissible purpose.

COUNT I
Against All Respondents
Fraudulently Misrepresenting the Purpose of Disbursements in Disclosure Reports
in violation of 52 U.S.C. § 30104(a)(1), (b)(5)(A)

25. Complainant the foregoing allegations as if set forth fully herein.

26. The Federal Election Campaign Act ("FECA") provides, "Each treasurer of a political committee shall file reports of receipts and disbursements in accordance with the provisions of this subsection. The treasurer shall sign each such report." 52 U.S.C. § 30104(a)(1).

27. Each such report must disclose the purpose of each operating expenditure over \$200. 52 U.S.C. § 30104(b)(5)(A).

28. The DCCC reported making a total of \$5,177,460.62 in payments between October 19, 2021, and July 15, 2022, to Elias Law Group for "RECOUNT LEGAL SVCS."

29. Thee DCCC's reported purpose for these disbursements appears to be false:

a. At the time these payments were made, there were no longer any recounts pending arising from congressional elections in 2020.

b. Such payments occurred as much as a year prior to the 2022 general election, making it highly unlikely they were connected to potential recounts in that election.

c. Moreover, the DCCC paid the Elias Law Group over \$7.3 million between July 15, 2022 and December 31, 2022, in connection with recount-related legal services involving the 2022

general election, making it highly unlikely millions of dollars in preparation work had already been completed.

d. Such payments also were unlikely to have been made in connection with recounts arising from the 2022 primary elections, since the DCCC typically stays neutral in such races and does not provide legal assistance to particular candidates.

e. Mark Elias has a history of allowing Democratic political committees to misrepresent the nature of his firm's legal services to shield their activities from public scrutiny.

30. On information and belief, it is reasonably likely the Elias Law Group participated in the DCCC's false reporting by providing billing statements to the DCCC misrepresenting the purpose of some or all of the firm's charges as being for recount-related legal services when in fact they were for other purposes.

WHEREFORE, the Commission should initiate enforcement proceedings against Respondents for potential violations of 52 U.S.C. §§ 30104(a)(1), (b)(5)(A).

COUNT II
Against All Respondents
Improper Expenditure of Funds from Separate Segregated Account
in violation of 52 U.S.C. §§ 30116(a)(9)(C)

31. Complainant the foregoing allegations as if set forth fully herein.

32. The Federal Election Campaign Act ("FECA") authorizes a national party committee, specifically including a "national congressional campaign committee of a political party," to establish a "separate, segregated account . . . which is used to defray expenses incurred with respect to the preparation for and the conduct of election recounts and contests and other legal proceedings."

33. The DCCC reported making a total of \$5,177,460.62 in payments between October 19, 2021, and July 15, 2022, to Elias Law Group for "RECOUNT LEGAL SVCS."

34. Based on the DCCC's disclosure the purpose of these payments were for "RECOUNT LEGAL SVCS," a reasonable possibility exists the DCCC made these disbursements from its separate, segregated recount account established pursuant to 52 U.S.C. § 30116(a)(9)(C).

35. The DCCC reported all of these payments on line 29 of its Form 3X. That is consistent with the FEC's guidance as to how national party committees should report disbursements from their separate segregated accounts. *See* FEC, *National Party Accounts for Certain Expenses*.¹³

36. It is unlikely these payments were actually made for recount-related services. *See supra* Count I. To the extent the DCCC's asserted purpose for these disbursements was false, the disbursements are likely impermissible uses of the DCCC's separate segregated recount account.

37. On information and belief, it is reasonably likely the Elias Law Group allowed the DCCC to funnel millions of dollars to it from the DCCC's separate segregated recount account by providing billing statements which misrepresented the purpose of some or all of the firm's charges as being for recount-related legal services, when in fact they were for other purposes.

WHEREFORE, the Commission should initiate enforcement proceedings against Respondents for potential violations of 52 U.S.C. §§ 30116(a)(9)(C).

¹³ <https://www.fec.gov/help-candidates-and-committees/registering-political-party/national-party-accounts-certain-expenses/>.

Conclusion

For these reasons, Complainant Committee to Defeat the President respectfully requests the Federal Election Commission commence enforcement proceedings against Respondent DCCC; Respondent Timothy Persico, in his official capacity as Treasurer of DCCC; and Respondent Elias Law Group LLP.

Respectfully submitted this 11th day of April, 2023.




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Defeat the President*

VERIFICATION

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

Respectfully submitted,

Dated April 10 2023


 Ted Harvey, Chairman
Committee to Defeat the President PAC
 441 North Lee Street, Suite 205
 Alexandria, VA 22314

COMPLETED BEFORE A NOTARY PUBLIC

State of Colorado
 City of Highlands Ranch
 County of Douglas



Subscribed, signed, and sworn to before me on this 10 day of April, 2023.

My Commission expires on 2/26/24.



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Disbursements

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Data type: processed

DCCC (C00000935)

2021-2022

PACs or party committees: Other federal operating expenditures (Line 21b)

"Elias Law"

Spender	Recipient	State	Description	Disbursement date	Amount
DCCC	ELIAS LAW GROUP LLP	DC	LEGAL SERVICES RENDERED	04/14/2022	\$10,000.00
DCCC	ELIAS LAW GROUP LLP	DC	LEGAL SERVICES RENDERED	04/14/2022	\$44,000.00
DCCC	ELIAS LAW GROUP LLP	DC	LEGAL SERVICES RENDERED	03/04/2022	\$45,525.00
DCCC	ELIAS LAW GROUP LLP	DC	LEGAL SERVICES RENDERED	03/04/2022	\$5,000.00
DCCC	ELIAS LAW GROUP LLP	DC	LEGAL SERVICES RENDERED	02/18/2022	\$38,812.50
DCCC	ELIAS LAW GROUP LLP	DC	LEGAL SERVICES RENDERED	02/18/2022	\$10,000.00
DCCC	ELIAS LAW GROUP LLP	DC	LEGAL SERVICES RENDERED	12/20/2021	\$38,812.50


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Browse Disbursements | FEC

Spender	Recipient	State	Description	Disbursement date	Amount
DCCC XXXXXXXXXXXX	ELIAS LAW GROUP LLP	DC	LEGAL SERVICES RENDERED	11/22/2021	\$38,812.50
DCCC XXXXXXXXXXXX	ELIAS LAW GROUP LLP	DC	LEGAL SERVICES RENDERED	11/22/2021	\$15,000.00
DCCC XXXXXXXXXXXX	ELIAS LAW GROUP LLP	DC	LEGAL SERVICES RENDERED	10/19/2021	\$38,812.50
DCCC XXXXXXXXXXXX	ELIAS LAW GROUP LLP	DC	LEGAL SERVICES RENDERED	10/19/2021	\$20,000.00

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Disbursements

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DCCC (C00000935)

2021-2022

PACs or party committees: Other disbursements (Line 29)

"Elias Law Group"

Spender	Recipient	State	Description	Disbursement date	Amount
DCCC	ELIAS LAW GROUP LLP	DC	RECOUNT LEGAL SVCS	04/14/2022	\$22,000.00
DCCC	ELIAS LAW GROUP LLP	DC	RECOUNT LEGAL SVCS	04/14/2022	\$231,070.80
DCCC	ELIAS LAW GROUP LLP	DC	RECOUNT LEGAL SVCS	04/14/2022	\$138,963.00
DCCC	ELIAS LAW GROUP LLP	DC	RECOUNT LEGAL SVCS	04/14/2022	\$1,924.00
DCCC	ELIAS LAW GROUP LLP	DC	RECOUNT LEGAL SVCS	04/14/2022	\$28,646.00

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Spender	Recipient	State	Description	Disbursement date	Amount
DCCC *****	ELIAS LAW GROUP LLP	DC	RECOUNT LEGAL SVCS	04/14/2022	\$24,622.00
DCCC *****	ELIAS LAW GROUP LLP	DC	RECOUNT LEGAL SVCS	03/04/2022	\$192.00
DCCC *****	ELIAS LAW GROUP LLP	DC	RECOUNT LEGAL SVCS	03/04/2022	\$22,000.00
DCCC *****	ELIAS LAW GROUP LLP	DC	RECOUNT LEGAL SVCS	03/04/2022	\$35,980.00
DCCC *****	ELIAS LAW GROUP LLP	DC	RECOUNT LEGAL SVCS	03/04/2022	\$14,720.00
DCCC *****	ELIAS LAW GROUP LLP	DC	RECOUNT LEGAL SVCS	03/04/2022	\$115,369.60
DCCC *****	ELIAS LAW GROUP LLP	DC	RECOUNT LEGAL SVCS	03/04/2022	\$7,618.00
DCCC *****	ELIAS LAW GROUP LLP	DC	RECOUNT LEGAL SVCS	03/04/2022	\$42,756.00
DCCC *****	ELIAS LAW GROUP LLP	DC	RECOUNT LEGAL SVCS	03/04/2022	\$80,453.43
DCCC *****	ELIAS LAW GROUP LLP	DC	RECOUNT LEGAL SVCS	03/04/2022	\$65,614.00
DCCC *****	ELIAS LAW GROUP LLP	DC	RECOUNT LEGAL SVCS	03/04/2022	\$1,522.00

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Spender	Recipient	State	Description	Disbursement date	Amount
DCCC *****	ELIAS LAW GROUP LLP	DC	RECOUNT LEGAL SVCS	02/18/2022	\$69,076.00
DCCC *****	ELIAS LAW GROUP LLP	DC	RECOUNT LEGAL SVCS	02/18/2022	\$47,710.00
DCCC *****	ELIAS LAW GROUP LLP	DC	RECOUNT LEGAL SVCS	02/18/2022	\$36,370.00
DCCC *****	ELIAS LAW GROUP LLP	DC	RECOUNT LEGAL SVCS	02/18/2022	\$27,927.50
DCCC *****	ELIAS LAW GROUP LLP	DC	RECOUNT LEGAL SVCS	02/18/2022	\$21,277.50
DCCC *****	ELIAS LAW GROUP LLP	DC	RECOUNT LEGAL SVCS	02/18/2022	\$12,937.50
DCCC *****	ELIAS LAW GROUP LLP	DC	RECOUNT LEGAL SVCS	02/18/2022	\$11,641.00
DCCC *****	ELIAS LAW GROUP LLP	DC	RECOUNT LEGAL SVCS	02/18/2022	\$11,477.50
DCCC *****	ELIAS LAW GROUP LLP	DC	RECOUNT LEGAL SVCS	02/04/2022	\$3,780.00
DCCC *****	ELIAS LAW GROUP LLP	DC	RECOUNT LEGAL SVCS	12/17/2021	\$12,937.50

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