

**BEFORE THE FEDERAL ELECTION COMMISSION**

Tiffany Muller  
End Citizens United  
PO Box 66005  
Washington, DC 20035

**RECEIVED**  
FEDERAL ELECTION COMMISSION  
OCTOBER 2, 2024 3:21 PM  
OFFICE OF GENERAL COUNSEL

Complainant,

**MUR 8323**

v.

ROBERT F. KENNEDY, JR.  
[REDACTED]

Los Angeles, California 90049

TEAM KENNEDY  
and ELLIE COX in her official  
capacity as treasurer  
P.O. Box 147  
South Walpole, MA 02071

IMPG ADVOCATES, INC.  
316 Hill Street, Suite 1020  
Mountville, PA 17554

PAUL A. ROSSI  
316 Hill Street, Suite 1020  
Mountville, PA 17554

Respondents.

**COMPLAINT**

This Complaint is filed with the Federal Election Commission (“FEC”) pursuant to 52 U.S.C. § 30109(a)(1) against Robert F. Kennedy, Jr. (“Kennedy”); Team Kennedy (the “Campaign”); Ellie Cox, in her official capacity as treasurer of Team Kennedy; Paul A. Rossi (“Rossi”); and IMPG Advocates, Inc. (“IMPG” or “Law Firm”) for accepting, making, and facilitating impermissible contributions, for not properly disclosing liabilities, and for other disclosure omissions, in violation of the Federal Election Campaign Act of 1971, as amended (“FECA” or the “Act”).

Federal law requires candidates for office to painstakingly raise funds from individual donors \$3,300 at a time. The same set of laws require candidates to pay their own campaign expenses. If you cannot pay your campaign expenses, you are required to report those outstanding liabilities as debts, so that the public can be informed about the viability of a campaign effort. As was recently shown in a New York court—where the court found that Mr. Kennedy used a “sham” address to maintain his voter registration—there is no “Kennedy” exception to following the law.<sup>1</sup>

Mr. Kennedy’s and the Campaign’s election improprieties arise from Team Kennedy’s relationship with attorney Paul Rossi which started in October of 2023.<sup>2</sup> According to Mr. Rossi’s testimony in the aforementioned New York court, his legal engagement is with Team Kennedy specifically—Mr. Rossi expressly denies a relationship with Mr. Kennedy, stating instead that he is “an independent contractor for Team Kennedy.”<sup>3</sup> FECA and Commission regulations prohibit corporations, including those providing independent contractor services to campaigns, from donating to federal candidates by providing no-cost services. The Act also places limits on the amount that permissible contributors may contribute to federal candidates, and it imposes reporting requirements for campaigns like Team Kennedy.

In violation of these laws, IMPG—a Pennsylvania corporation—and Mr. Rossi contributed in-kind contributions in the form of unpaid legal and other services to Team Kennedy. Further, Mr. Kennedy and his Campaign have failed to accurately report any

---

<sup>1</sup> Cartwright v. Kennedy at 30-34, Index No: 906349-24 (N.Y. Gen. Term Aug. 12, 2024) (finding that Mr. Kennedy “made the deliberate choice to use [a fraudulent] address as his ‘place of residence’ on [his] nominating petition despite that fact that he never resided there” and that this practice “open[s] the door to the fraud and political mischief that the [New York] Election Law residency rules were designed to prevent.”).

<sup>2</sup> Transcript of Hearing at 187, Cartwright v. Kennedy, Index No: 906349-24 (N.Y. Gen. Term argued Aug. 7, 2024).

<sup>3</sup> *Id.* at 186.

contributions—in-kind or otherwise—from IMPG or Mr. Rossi and have failed to report debts owed to the Law Firm or Mr. Rossi.

More specifically, as this Complaint will demonstrate, IMPG, through Mr. Rossi, continually renders legal and other ballot access services to the Campaign. The Campaign has not paid IMPG or Mr. Rossi for these services, and Mr. Rossi has made clear that he does not intend to provide such services in a volunteer capacity. Accordingly, these services are contributions to Team Kennedy in excess of the Act’s dollar limits. Should the Campaign reimburse Mr. Rossi or IMPG for these costs, such a scenario would create an impermissible corporate loan from IMPG to the Campaign, further violating the Act. In any event, the Campaign violated FECA’s reporting requirements by failing to report its debts owed to IMPG or Mr. Rossi. Moreover, these services constitute illegal in-kind corporate contributions to Mr. Kennedy and his Campaign from IMPG, the corporate entity employing Mr. Rossi. For these reasons, there is reason to believe that the parties named in this Complaint regularly engage in activities that are in direct violation of FECA and corresponding Commission regulations.

### FACTS

Robert F. Kennedy Jr. is a candidate for President of the United States.<sup>4</sup> Team Kennedy is the principal campaign committee of Mr. Kennedy.<sup>5</sup> Ellie Cox is the treasurer for Team Kennedy.<sup>6</sup> IMPG Advocates, Inc. is a Pennsylvania domestic business corporation.<sup>7</sup> Paul Rossi is an attorney employed by IMPG and, on upon information and belief, the sole owner of IMPG.<sup>8</sup>

---

<sup>4</sup> Team Kennedy, Statement of Organization 2024 at 2 (March 26, 2024), <https://docquery.fec.gov/pdf/392/202407239665718392/202407239665718392.pdf>.

<sup>5</sup> *Id.*

<sup>6</sup> *Id.*

<sup>7</sup> Online Search of IMPG Advocates, Inc., Pennsylvania Department of State, <https://file.dos.pa.gov/search/business> (search “IMPG Advocates”) (documenting IMPG Advocates as a Pennsylvania domestic corporation as of June 20, 2024).

<sup>8</sup> See Complaint at 21, Team Kennedy v. Bellows (Case 1:24-cv-00052-JAW) (Dist. Me.) (establishing Paul Rossi and IMPG Advocates as Team Kennedy’s Counsel).

Mr. Rossi is an experienced political attorney who has represented political committees since at least 2016.<sup>9</sup> Federal Election Commission records show that IMPG and Mr. Rossi routinely receive compensation from other political committees for Mr. Rossi's legal services pursuant to its normal course of business.<sup>10</sup> Mr. Rossi not only has a history of representing political campaigns, but he describes himself as a top attorney in the field. Despite graduating law school roughly thirty years ago, Mr. Rossi recently recalled that he "did very well in law school," finishing with Latin honors; he further stated that he "was able to get the good jobs after graduation" and that his "notoriety" brought him "to the attention of people in the ballot access world."<sup>11</sup>

As is its normal course of business, IMPG began providing services to Team Kennedy in 2023, with Mr. Rossi stating that he maintains an independent contractor relationship with Team Kennedy.<sup>12</sup> Accordingly, Mr. Rossi clearly does not intend to volunteer his services to Team Kennedy. Consistent with Mr. Rossi's statements, Mr. Kennedy publicly recognizes that Mr. Rossi is Team Kennedy's counsel.<sup>13</sup> Mr. Rossi's services on behalf of Team Kennedy vary widely.<sup>14</sup> Foremost, Mr. Rossi advises the Campaign on state ballot access laws and represents Team Kennedy in its efforts to obtain state ballot access and challenge state ballot access laws.<sup>15</sup> Mr. Rossi states that he "put together a 50-state ballot access program so that the name of Robert

---

<sup>9</sup> Disbursements,

[https://www.fec.gov/data/disbursements/?data\\_type=processed&recipient\\_name=impg&recipient\\_name=rossi%2C+paul&max\\_date=12%2F31%2F2024](https://www.fec.gov/data/disbursements/?data_type=processed&recipient_name=impg&recipient_name=rossi%2C+paul&max_date=12%2F31%2F2024) (last visited August 08, 2024).

<sup>10</sup> *Id.*

<sup>11</sup> Transcript of Hearing at 182-83, *Cartwright v. Kennedy*, Index No: 906349-24 (N.Y. Gen. Term argued Aug. 7, 2024).

<sup>12</sup> See Complaint at 39, *Team Kennedy v. Berger* (Case 1:24-cv-03897-ALC) (E.D.N.Y. 2024) (stating that Team Kennedy, "through undersigned legal counsel" brought action against the New York State Board of Elections).

<sup>13</sup> Rebecca Davis O'Brien, *Surprise Tactics and Legal Threats: Inside R.F.K. Jr.'s Ballot Access Fight*, N.Y. TIMES (Apr. 29, 2024), <https://www.nytimes.com/2024/04/29/us/politics/Mr.-Kennedy-jr.-ballot-access.html>.

<sup>14</sup> *Id.*; Complaint at 3, *Team Kennedy v. Berger* (Case 1:24-cv-03897-ALC) (E.D.N.Y. 2024) (stating that Team Kennedy, through IMPG and Mr. Rossi, brought action against the New York State Board of Elections to challenge "ballot access restrictions").

<sup>15</sup> *Id.*

F. Kennedy, Jr. and whomever his Vice Presidential candidate would be would appear on the ballot in 2024.”<sup>16</sup> Mr. Rossi explains that his services extend to cover “all legal research and any advice that they [the Campaign] needed through [the ballot access] process.”<sup>17</sup>

Despite his attorney status, Mr. Rossi’s services to the Campaign extend far beyond legal advice for ballot access. Mr. Rossi routinely provides communications services for Team Kennedy, appearing at news briefings and speaking to reporters on the record.<sup>18</sup> Mr. Rossi also provides strategic advice for Team Kennedy, like whether the Campaign should employ petition circulators or use volunteers.<sup>19</sup> Mr. Rossi, under oath, admits to “put[ting] together a 50-state ballot access program,” showcasing Mr. Rossi’s wide variety of services for Team Kennedy.

Mr. Rossi’s services to Team Kennedy are costly, and Mr. Rossi is clear that he is not volunteering his time to the campaign. In court filings, Team Kennedy, through IMPG and Mr. Rossi, admits that Team Kennedy must “spend funds for . . . fees . . . for legal counsel” in relation to the aforementioned services.<sup>20</sup> Mr. Rossi has publicly stated that legal services in relation to Team Kennedy’s ballot access are “time-consuming” and “costly.”<sup>21</sup> However, in a recent New York court case, during which Mr. Rossi testified under oath on behalf of Mr. Kennedy, Mr. Rossi stated that he “has not asked to be paid yet” from Mr. Kennedy but that he

---

<sup>16</sup> Transcript of Hearing at 191, Cartwright v. Kennedy, Index No: 906349-24 (N.Y. Gen. Term argued Aug. 7, 2024).

<sup>17</sup> Complaint at 3, Team Kennedy v. Berger (Case 1:24-cv-03897-ALC) (E.D.N.Y. 2024) (stating that Team Kennedy, through IMPG and Mr. Rossi, brought action against the New York State Board of Elections to challenge “ballot access restrictions”).

<sup>18</sup> See, e.g., Greg Haas, *Nevada Secretary of State Confirms Mistake Made in Instructions to RFK Jr.’s Campaign*, 8NewsNow.com (Apr. 5, 2024), <https://www.8newsnow.com/news/local-news/nevada-secretary-of-state-confirms-mistake-made-in-instructions-to-rfk-jr-s-campaign/> (quoting Paul Rossi in a story regarding Team Kennedy’s ballot access); Team Kennedy, *Kennedy Campaign to Hold Virtual Ballot Access Press Briefing*, Kennedy Shannahan (last visited Aug. 15, 2024), [https://www.kennedy24.com/kennedy\\_hold\\_virtual\\_ballot\\_access\\_press\\_briefing](https://www.kennedy24.com/kennedy_hold_virtual_ballot_access_press_briefing) (listing Mr. Rossi as a speaker at a Team Kennedy press conference).

<sup>19</sup> Transcript of Hearing at 188-191, Cartwright v. Kennedy, Index No: 906349-24 (N.Y. Gen. Term argued Aug. 7, 2024).

<sup>20</sup> *Id.* at 27.

<sup>21</sup> Rebecca Davis O’Brien, *Surprise Tactics and Legal Threats: Inside R.F.K. Jr.’s Ballot Access Fight*, N.Y. TIMES (Apr. 29, 2024), <https://www.nytimes.com/2024/04/29/us/politics/Mr.-Kennedy-jr-ballot-access.html>.

“probably will.”<sup>22</sup> Mr. Rossi, thus, clearly does not intend to proctor his services to the Campaign as a volunteer. To the contrary, Mr. Rossi is a self-described contractor for Team Kennedy.<sup>23</sup>

Despite the costly nature of Mr. Rossi’s services for the Campaign, Team Kennedy has not made a single disbursement to Mr. Rossi or IMPG.<sup>24</sup> The Campaign also fails to report debts owed to either IMPG or Mr. Rossi for Mr. Rossi’s costly services.<sup>25</sup> Simply put, Mr. Rossi’s services on behalf of Team Kennedy should have produced a whale of a bill for the Campaign. However, the Campaign, to date, does not bear any of the costs of Rossi’s services. Such a scheme is a large-scale effort by Team Kennedy and Mr. Rossi to worm around the Act’s contribution limits and reporting requirements to influence the 2024 presidential election.

### SUMMARY OF THE LAW

The Act places dollar limits on the amount that one candidate can receive from an individual source.<sup>26</sup> The Act’s contribution limits are core to the integrity of the United States electoral process and are key in allowing such a process to function.<sup>27</sup> The Act defines a “contribution,” in relevant part, as “. . . anything of value made by any person for the purpose of influencing any election for Federal office.”<sup>28</sup> The term also includes “the payment by any person of compensation for the personal services of another person which are rendered to a

---

<sup>22</sup> Transcript of Hearing at 186, Cartwright v. Kennedy, Index No: 906349-24 (N.Y. Gen. Term argued Aug. 7, 2024).

<sup>23</sup> *Id.*

<sup>24</sup> Team Kennedy, Spending, <https://www.fec.gov/data/committee/C00836916/?tab=spending> (last visited August 09, 2024).

<sup>25</sup> *See, e.g.*, Team Kennedy, Report of Receipts and Disbursements at 5,916-17 (Jul. 19, 2024), <https://docquery.fec.gov/pdf/717/202407199661391717/202407199661391717.pdf> (reporting multiple debts to Gavin de Becker and Associates, LP, and none to IMPG or Mr. Rossi).

<sup>26</sup> 52 U.S.C. § 30116(a)(1)(A).

<sup>27</sup> *McCormell v. FEC.*, 540 U.S. 93, 136-37 (2003) (citing *FEC v. Nat’l Right to Work Comm.*, 459 U.S. 197, 208 (1982)).

<sup>28</sup> 52 U.S.C. § 30101(8)(A)(i).

political committee.”<sup>29</sup> For the 2024 election cycle, FEC regulations prohibit individual persons from making, and authorized candidate committees from accepting, contributions of more than \$3,300 per election.<sup>30</sup>

In addition to limiting the amount that an individual may contribute to a candidate, the Act also restricts the sources from which a candidate may receive funds.<sup>31</sup> Among these source prohibitions, the Act prohibits corporations from making contributions directly to candidates.<sup>32</sup> In addition to the aforementioned definition of “contribution,” the Act’s source prohibition, in part, defines a contribution as the “gift of . . . any services” from a corporation to a candidate or authorized committee.<sup>33</sup>

Also included in the definition of “contribution” is a loan to a candidate—Commission regulations provide that a loan provided “by any person for the purpose of influencing an election is a contribution.”<sup>34</sup> A loan remains a contribution as long as it remains unpaid by the recipient campaign.<sup>35</sup> However, to the extent that a loan exceeds the aforementioned contribution limits, the entire loan is “unlawful” regardless of whether the campaign repays the loan.<sup>36</sup>

Integral to its enforcement mechanism, the Act requires candidates, including candidates for President, and their authorized committees to file reports with the FEC to detail fundraising

---

<sup>29</sup> 52 U.S.C. § 30101(8)(A)(ii).

<sup>30</sup> 52 U.S.C. § 30116(1)(A); 52 U.S.C. § 30116(f) (prohibiting a candidate or political committee from knowingly accepting contributions in violation of FECA’s dollar limit or source prohibitions).

<sup>31</sup> *See generally* 52 U.S.C. §§ 30118-30119.

<sup>32</sup> *Id.* § 30118(a).

<sup>33</sup> *Id.* § 30118(b)(2).

<sup>34</sup> 11 C.F.R. § 100.52(a).

<sup>35</sup> *Id.* § 100.52(b)(2).

<sup>36</sup> *Id.* § 100.52(b)(1).

and spending.<sup>37</sup> Such reporting provides the electorate with information so that voters can properly evaluate candidates for federal office and deters such candidates from engaging in corrupt practices.<sup>38</sup> Specifically, the Act requires, among other categories, that authorized committees report contributions and individual contributors, “expenditures made to meet candidate or committee operating expenses,” and “the amount and nature of outstanding debts and obligations.”<sup>39</sup>

The Commission has long held that the “anything of value” definition of contribution includes the provision of services at no or discounted cost. In Advisory Opinion 1984-42 (Sierra Club), the Commission bluntly stated that “the Act and regulations prohibit a corporation from using its general treasury funds to provide goods and services at no charge to candidates in any federal election.”<sup>40</sup> Accordingly, the Commission advised that a corporation could not lend its employees’ services to political campaigns—regardless of whether a separate segregated fund later reimbursed the corporation for its employment costs.<sup>41</sup> The Commission reasoned that “the initial disbursement of corporation treasury monies” was “something of value” if not reimbursed or, if reimbursed, an impermissible corporate loan.<sup>42</sup> Conversely, in Advisory Opinion 1984-37 (AMA), the Commission advised that a corporation would not violate the Act’s corporate source prohibition if it received payments for such services “prior to the rendering of those services and prior to compensating the employees for such services.”<sup>43</sup> The corporation in the AMA opinion

---

<sup>37</sup> *Id.* § 30104(a)(3); *Buckley v. Valeo*, 424 U.S. 1, 67-68 (1975) (“recordkeeping, reporting, and disclosure requirements are an essential means of gathering the data necessary to detect violations of the contribution limitations”).

<sup>38</sup> *Buckley v. Valeo*, 424 U.S. 1, 66-67 (1975).

<sup>39</sup> 52 U.S.C. § 30104(b)(2)(A), (b)(3)(A), (b)(4)(A), (b)(8).

<sup>40</sup> Advisory Opinion 9184-24 (Sierra Club) at 4.

<sup>41</sup> *Id.* at 4-5.

<sup>42</sup> *Id.*

<sup>43</sup> Advisory Opinion 1984-37 (AMA) at 3.

received the “usual and normal charge for the consulting services of [its] employees.”<sup>44</sup> The prior payment of a usual and normal charge, the Commission reasoned, did not constitute a loan or thing of value.<sup>45</sup>

In the context of legal and accounting services, the Act and Commission regulations exempt from the definition of “contribution” the “legal or accounting services rendered to or on behalf of an authorized committee of a candidate . . . solely for the purpose of ensuring compliance with [the Act].”<sup>46</sup> Both the Act and Commission regulations require that recipient committees report the value of legal services provided under this exemption.<sup>47</sup> The legal and accounting services exemption to the definition of “contribution” is limited “solely” to such services provided to ensure compliance with the Act.<sup>48</sup> This exemption does not apply to legal and accounting services provided for activities not within the scope of the Act.<sup>49</sup>

Commission precedents establish that legal services falling outside of the FECA-compliance exemption provided to a campaign at no or below cost are contributions under the Act. In Advisory Opinion 1979-22 (Carter/Mondale), an attorney’s law firm paid a third of the attorney’s overall compensation, and a presidential campaign committee paid the remaining portion of the attorney’s compensation.<sup>50</sup> The attorney’s duties for the campaign involved both “FECA compliance and campaign public financing matters” and “other legal and political duties.”<sup>51</sup> The committee at issue in the advisory opinion paid the attorney for his services provided pursuant to his “other legal and political duties.”<sup>52</sup> The Commission advised that this

---

<sup>44</sup> *Id.* at 3-4.

<sup>45</sup> *Id.*

<sup>46</sup> 52 U.S.C. § 30101(8)(B)(vii)(II); 11 C.F.R. § 114.1(a)(2)(vii).

<sup>47</sup> 52 U.S.C. § 30101(8)(B)(vii)(II); 11 C.F.R. § 114.1(a)(2)(vii).

<sup>48</sup> *Id.*

<sup>49</sup> See Advisory Opinion 1984-37 (AMA) at 3-4.

<sup>50</sup> Advisory Opinion 1979-22 (Carter/Mondale) at 1.

<sup>51</sup> *Id.* at 3.

<sup>52</sup> *Id.*

payment schedule would not result in a contribution as defined by the Act.<sup>53</sup> In Advisory Opinion 2006-02 (Wallace), the Commission advised that a corporate law firm could not prepare an amicus brief on behalf of a candidate's committee without the committee paying "the usual and normal charge for such services in a timely manner."<sup>54</sup> The brief was related to a state ballot access challenge, and the Commission reasoned that the attorneys' provision of free services to the committee constituted contributions under the Act.<sup>55</sup> Moreover, the firm's compensation to its employees to prepare the brief—without charging the committee—would have constituted an impermissible corporate contribution since the Firm was incorporated.<sup>56</sup>

Commission precedent also establishes that the costs of legal services for a candidate's ballot access are not governed by the Act only when such services are separate from a candidate's campaign—the Commission holds that these services are not "for the purpose of influencing any election for federal office."<sup>57</sup> Thus, donations and disbursements related to these services do not "constitute contributions or expenditures under the Act."<sup>58</sup> However, where a candidate seeks to raise and spend funds for such services outside of the purview of the Act, the candidate—and not the candidate's committee—must establish a fund separate from the committee to raise and spend such funds.<sup>59</sup> The separation of such funds from the campaign are integral to avoiding the Act's purview. In Advisory Opinion 1996-39 (Heintz), the Commission expressly stated non-FECA ballot access funds "must be separate and independent from the

---

<sup>53</sup> *Id.*

<sup>54</sup> Advisory Opinion 2006-22 (Wallace) at 4.

<sup>55</sup> *Id.*

<sup>56</sup> *Id.*

<sup>57</sup> Advisory Opinion 2023-03 (Colorado Republican State Central Committee) at 6.

<sup>58</sup> *Id.*

<sup>59</sup> *See, e.g.*, Advisory Opinion 1996-39 (Heintz) at 2 ("funds received and spent to pay for the expenses of the litigation . . . would not be treated as contributions or expenditures for purposes of the Act, *provided they are raised and spent by an entity other than a political committee.*") (emphasis added); Advisory Opinion 1983-30 (Joyner) at 1-2 (providing advice contingent that the non-FECA funds are not "commingled with" the committee's funds).

candidate's principal (or any authorized) campaign committee."<sup>60</sup> Otherwise, the Commission reasoned, such funds "would influence the election."<sup>61</sup> The Commission noted that references to candidacy or other candidate-centric activities associated with such funds would constitute "something of value to the candidate's campaign," possibly resulting in a contribution to the campaign.<sup>62</sup> Similarly, in Advisory Opinion 1983-30 (Joyner), the Commission made clear that non-FECA ballot access funds avoid the Act's purview only when "none of the residual monies, upon dissolution of the fund" are distributed to the candidate's campaign.<sup>63</sup>

## CAUSES OF ACTION

### COUNT I

#### **MR. ROSSI AND IMPG ADVOCATES, INC. MADE, AND TEAM KENNEDY ACCEPTED, EXCESSIVE CONTRIBUTIONS IN VIOLATION OF 52 U.S.C § 30116.**

FECA and FEC regulations prohibit persons from making, and authorized candidate committees from accepting, contributions in excess of \$3,300 per election.<sup>64</sup> Because Team Kennedy has not reported a disbursement to IMPG or Mr. Rossi, and because IMPG and Mr. Rossi indisputably provide legal and other services to Team Kennedy in relation to its ballot access efforts, outside of the FECA-compliance exemption, IMPG and Mr. Rossi have provided Team Kennedy with a contribution as defined by the Act. This case is like the requestor's case in the Wallace Advisory Opinion. Like the potential contribution identified in the Wallace Advisory Opinion, IMPG and Mr. Rossi provide Team Kennedy with legal services related to ballot access—services provided outside of FECA compliance. This case is unlike that of the requestor in the Carter/Mondale Advisory Opinion—here, Team Kennedy has not reported a single

---

<sup>60</sup> Advisory Opinion 1996-39 (Heintz) at 2.

<sup>61</sup> *Id.*

<sup>62</sup> *Id.* at 3.

<sup>63</sup> Advisory Opinion 1983-30 (Joyner) at 2.

<sup>64</sup> 52 U.S.C. § 30116(1)(A); 52 U.S.C. § 30116(f) (prohibiting a candidate or political committee from knowingly accepting contributions in violation of FECA's dollar limit or source prohibitions).

payment to IMPG or Mr. Rossi to compensate either party for their legal services rendered outside of the FECA-compliance exemption.

Moreover, IMPG and Mr. Rossi provide legal services directly to Team Kennedy,<sup>65</sup> pushing these services under the purview of the Act. The provision of legal services directly to the campaign is in stark contrast to the Commission’s precedent that non-FECA governed legal funds be separated from a candidate’s committee. As the Commission determined in the Heintz and Joyner advisory opinions, a candidate must avoid commingling non-FECA contributions with campaign funds.<sup>66</sup> Contrary to this tenet, in this case, IMPG’s and Mr. Rossi’s services to the Campaign cannot be distinguished from any contemporaneous services provided to Mr. Kennedy in his personal capacity. To the contrary, Mr. Rossi has stated that his services extend to “whomever [Mr. Kennedy’s] Vice Presidential candidate would be” and that he provided “all legal research and any advice that” the Campaign needed throughout the ballot access process.<sup>67</sup> Mr. Rossi went so far as to describe himself as a “an independent contractor for Team Kennedy,” stating that he does not have any relationship with Mr. Kennedy personally.<sup>68</sup> Thus, any Commission precedent establishing that such services might fall outside of the scope of the Act is not applicable in this case—here, Mr. Rossi clearly provides no-cost legal services to the Campaign, not to Mr. Kennedy personally. Accordingly, Mr. Rossi’s and IMPG’s provision of these services—and Team Kennedy’s acceptance of such services—are to influence Mr. Kennedy’s election to a federal office. Thus, the provision of these services must fall under the purview of the Act.

---

<sup>65</sup> See, e.g., Exhibit E: Cartwright v. Kennedy at 2, Index No: 906349-24 (N.Y. Gen. Term Aug. 12, 2024) (describing Paul Rossi as “senior counsel for ballot access on Kennedy’s *campaign*”) (emphasis added); Complaint, Team Kennedy v. Berger (Case 1:24-cv-03897-ALC) (E.D.N.Y. 2024) (stating that Team Kennedy, through Mr. Rossi and IMPG, brought action against the New York State Board of Elections).

<sup>66</sup> Heintz, *supra* note 53; Joyner, *supra* note 53.

<sup>67</sup> Transcript of Hearing at 191, Cartwright v. Kennedy, Index No: 906349-24 (N.Y. Gen. Term argued Aug. 7, 2024).

<sup>68</sup> *Id.* at 186.

As established above, the legal services provided by IMPG and Mr. Rossi are contributions falling under FECA's purview. Furthermore, as established by this Complaint, the types of ballot access services provided by IMPG and Mr. Rossi to Team Kennedy are costly. In fact, the value of Mr. Rossi's services for previous committees totals well over the \$3,300 limit. Commission records show that, in 2014, Mr. Rossi received \$5,000 from the Libertarian National Committee for "legal expenses" as an in-kind contribution to the 2012 Gary Johnson campaign, and, in 2012, Mr. Rossi received \$5,500 for "PA ballot access legal expense" from the Libertarian National Committee.<sup>69</sup> From 2016-2017, IMPG received disbursements totaling over \$50,000 from Rocky de la Fuente's 2016 campaign for "legal fees."<sup>70</sup>

Team Kennedy's and Mr. Rossi's public statements regarding the "costly" nature of Team Kennedy's ballot access efforts, combined with the value of IMPG's and Mr. Rossi's past compensation for their services in such efforts, lead to the conclusion that the value of IMPG's services here total well over \$3,300 per election. Because these services are contributions under the Act, and because the value of such services totals over \$3,300 per election, Mr. Rossi, IMPG, and Team Kennedy have clearly violated 52 U.S.C. § 30116 by making and accepting contributions above the allowable dollar limit.

## COUNT II

### **TEAM KENNEDY FAILED TO REPORT DEBTS OWED TO IMPG ADVOCATES, INC. IN VIOLATION OF 52 U.S.C. § 30104.**

As stated above, the Act requires that authorized candidate committees file reports with the Commission that detail, in part, the committee's debts. Thus, Team Kennedy, as the

---

<sup>69</sup> Disbursements, [https://www.fec.gov/data/disbursements/?data\\_type=processed&recipient\\_name=impg&recipient\\_name=rossi%2C+paul&max\\_date=12%2F31%2F2024](https://www.fec.gov/data/disbursements/?data_type=processed&recipient_name=impg&recipient_name=rossi%2C+paul&max_date=12%2F31%2F2024) (last visited August 08, 2024).

<sup>70</sup> *Id.*

authorized candidate committee for Mr. Kennedy, is required to report its debts on its monthly FEC report. Despite receiving legal services from IMPG and Mr. Rossi, Team Kennedy has not reported a single disbursement to IMPG or Mr. Rossi. Perhaps, this is because Mr. Rossi has publicly admitted to not invoicing Team Kennedy for his services, despite stating that he “probably will.”<sup>71</sup> Moreover, Mr. Rossi’s statements make clear that his services are not conducted in a volunteer capacity—Mr. Rossi clearly intends to receive payment for his services to Team Kennedy, referring to himself as an “an independent contractor for Team Kennedy.”<sup>72</sup> Thus, Team Kennedy clearly owes Mr. Rossi or IMPG for Mr. Rossi’s services, and the Campaign routinely fails to report the amounts it owes to IMPG for Mr. Rossi’s services in clear violation of its reporting obligations set forth in 52 U.S.C. § 30104.

### COUNT III

#### **IMPG ADVOCATES, INC. MADE, AND TEAM KENNEDY ACCEPTED, A CORPORATE LOAN IN VIOLATION OF 11 C.F.R. § 100.52.**

Not only are the services by IMPG for Team Kennedy “contributions” under the “anything of value” definition of the term, but these services also constitute illegal contributions as: (1) a loan in excess of allowable dollar limits, or (2) a prohibited corporate loan. This case is like that of the requestor in the Sierra Club Advisory Opinion—here, IMPG employs Mr. Rossi. Mr. Rossi, under the scope of this employment, provides legal services to Team Kennedy, and Team Kennedy has not paid IMPG for these services. Like the advance payment of employee salaries for campaign services in the Sierra Club Advisory Opinion, IMPG’s employment of Mr. Rossi—without any compensation from Team Kennedy—constitutes a loan from IMPG to Team Kennedy under Commission regulations.

---

<sup>71</sup> Transcript of Hearing at 186, Cartwright v. Kennedy, Index No: 906349-24 (N.Y. Gen. Term argued Aug. 7, 2024).

<sup>72</sup> *Id.*

This case is unlike that of the requestor in the AMA advisory opinion. Here, Team Kennedy has not made one disbursement to IMPG, much less an advance disbursement for the “usual and normal charge” of IMPG’s legal services. Thus, IMPG’s employment of Mr. Rossi to provide legal services to Team Kennedy constitutes a loan to the campaign. As established above, this loan was provided by a corporation in excess of allowable dollar limits. Thus, IMPG’s provision of this loan, and Team Kennedy’s acceptance of the loan, is unlawful under 11 C.F.R. § 100.52.

#### **COUNT IV**

#### **IMPG ADVOCATES, INC. MADE, AND TEAM KENNEDY ACCEPTED, PROHIBITED CORPORATE CONTRIBUTIONS IN VIOLATION OF 52 U.S.C. § 30118.**

As stated above, the Act prohibits corporations from making contributions “in connection with any election at which presidential and vice presidential electors . . . are to be voted for.”<sup>73</sup> Since at least 2023, IMPG Advocates, Inc.—via attorney Paul Rossi—has represented Team Kennedy in ballot access-related matters in at least five states. However, despite admitting that these ballot access services are costly, Team Kennedy has not reported a single disbursement to IMPG Advocates or Mr. Rossi. Moreover, Mr. Rossi’s statements clearly show that he is not a volunteer for Team Kennedy; rather, his statements make clear that he intends to invoice the Campaign for his services.<sup>74</sup> As established in this Complaint, IMPG is a corporation under the laws of Pennsylvania. Accordingly, IMPG’s legal services via Mr. Rossi constitute corporate contributions as established by the Act and Commission precedent. These corporate contributions are in direct violation of 52 U.S.C. § 30118.

---

<sup>73</sup> 52 U.S.C. § 30118(a).

<sup>74</sup> Transcript of Hearing at 186, *Cartwright v. Kennedy*, Index No: 906349-24 (N.Y. Gen. Term argued Aug. 7, 2024).

**PRAYER FOR RELIEF**

For the above reasons, the Commission should find reason to be believe that Paul Rossi, IMPG Advocates, Inc., Mr. Kennedy, and his campaign violated 52 U.S.C. §§ 30101-30146 and corresponding Commission regulations. The Commission should conduct an immediate investigation pursuant to 52 U.S.C. § 30109(a)(2). The Commission should pursue appropriate sanctions for all violations, and it should pursue additional remedies as necessary and appropriate to procure compliance with the Act and corresponding Commission regulations.

Sincerely,



Tiffany Muller  
End Citizens United  
PO Box 66005  
Washington, DC 20035

SUBSCRIBED AND SWORN to before me this 20<sup>th</sup> day of October 2024.



Notary Public  
My Commission Expires:

**MARK ANDREWS**  
**NOTARY PUBLIC DISTRICT OF COLUMBIA**  
My Commission Expires July 14, 2029

