

BEFORE THE FEDERAL ELECTION COMMISSION OF THE UNITED STATES OF AMERICA

In the Matter of:
Dan Osborn
Osborn for Senate
Victoria Perrone, Treasurer
Osborn for Senate 2024
James Vihstadt, Treasurer
Working Class Heroes Fund
Jodi Osborn, Treasurer
League of Labor Voters
Jorge Badillo, Treasurer

MUR No. _____

COMPLAINT

1. Americans for Public Trust (“Complainant”) brings this complaint before the Federal Election Commission (“FEC” or “Commission”) seeking an immediate investigation and enforcement action against U.S. Senate candidate Dan Osborn, Osborn for Senate and Victoria Perrone in her official capacity as treasurer, Osborn for Senate 2024 and James Vihstadt in his official capacity as treasurer, Working Class Heroes Fund and Jodi Osborn in her official capacity as treasurer (“WCHF”), and League of Labor Voters and Jorge Badillo in his official capacity as treasurer (“LLV”), for violations of the Federal Election Campaign Act of 1971, as amended (“FECA” or “Act”).
2. This complaint is filed pursuant to 52 U.S.C. § 30109(a)(1) and is based on information providing reason to believe that:
3. Respondents converted campaign funds to personal use in violation of 52 U.S.C. § 30114(b)(1) and 11 C.F.R. § 113.2(e); and respondents solicited, received, directed, transferred, or spent funds that did not comply with FECA’s contribution limitations, source prohibitions, and reporting requirements in violation of 52 U.S.C. § 30125(e)(1) and 11 C.F.R. § 300.61.

STATEMENT OF THE LAW

4. Under the Act and the Commission’s regulations, a “candidate” is “an individual who seeks nomination for election, or election, to Federal office” and who receives aggregate contributions or makes aggregate expenditures in excess of \$5,000.¹ A candidate for federal office must file a Statement of Candidacy with the FEC and designate a principal campaign committee within fifteen days of becoming a candidate.²
5. 52 U.S.C. § 30114(b)(1) and 11 C.F.R. § 113.2(e) prohibit the conversion of campaign funds for personal use by any person.
6. Generally, campaign funds are converted to personal use if they are “used to fulfill any commitment, obligation, or expense of a person that would exist irrespective of the candidate’s election campaign.”³
7. Commission regulations enumerate certain expenses that constitute *per se* personal use of campaign funds, including salary payments made to a candidate’s family member, unless the family member provides *bona fide* campaign-related services and is not paid in excess of fair market value for the

¹ 52 U.S.C. § 30101(2); 11 C.F.R. § 100.3.

² 52 U.S.C. § 30102(e)(1); 11 C.F.R. § 101.1(a).

³ 52 U.S.C. § 30114(b)(1).

services. Any salary payment to a member of a candidate's family that is in excess of fair market value is personal use.⁴

8. The Commission has advised that, consistent with the requirement to pay family members no more than fair market value for *bona fide* services, a campaign's contract with a candidate's family member should conform to standard contractual terms and industry practices.⁵
9. Pursuant to 52 U.S.C. § 30125(e)(1)(A) and 11 C.F.R. § 300.61, a federal candidate, any agent of a federal candidate, and any "entity directly or indirectly established, financed, maintained or controlled by or acting on behalf of" a federal candidate may *not* "solicit, receive, direct, transfer, or spend funds in connection with an election for Federal office, including funds for any Federal election activity, unless the funds are subject to the limitations, prohibitions, and reporting requirements of this Act."
10. Pursuant to 52 U.S.C. § 30125(e)(1)(B) and 11 C.F.R. § 300.62, a federal candidate, any agent of a federal candidate, and any "entity directly or indirectly established, financed, maintained or controlled by or acting on behalf of" a federal candidate may *not* "solicit, receive, direct, transfer, or spend funds in connection with any election other than an election for Federal office or disburse funds in connection with such an election unless the funds" are consistent with federal amount limits and source prohibitions.
11. These provisions effectively prohibit a federal candidate, as well as his or her agents and any entities established, financed, maintained, or controlled by the federal candidate, from soliciting or spending what is commonly known as "soft money."
12. For purposes of the soft money restrictions in 52 U.S.C. § 30125(e)(1) and 11 C.F.R. §§ 300.61 and 300.62, an "agent" of a federal candidate is "any person who has actual authority, either express or implied, to...solicit, receive, direct, transfer, or spend funds in connection with any election."⁶
13. When determining whether a federal candidate or his or her agent established, financed, maintained, or controlled an entity, the Commission examines a non-exhaustive list of ten factors set forth at 11 C.F.R. § 300.2(c)(2). The factors "must be examined in the context of the overall relationship" between a federal candidate and the entity "to determine whether the presence of any factor or factors is evidence that the [candidate] directly or indirectly established, finances, maintains, or controls the entity." These factors include whether the federal candidate or his or her agent:
 - Has the authority or ability to direct or participate in the governance of the entity through provisions of constitutions, bylaws, contracts, or other rules, or through formal or informal practices or procedures;
 - Has the authority or ability to hire, appoint, demote, or otherwise control the officers, or other decision-making employees or members, of the entity;
 - Has common or overlapping officers or employees with the entity that indicates a formal or ongoing relationship between the federal candidate's campaign and the entity;
 - Had an active or significant role in the formation of the entity; and
 - Have similar patterns of receipts or disbursements that indicate a formal or ongoing relationship between the sponsor and the entity.⁷

STATEMENT OF FACTS

14. Dan Osborn ran, and lost, as an independent candidate for U.S. Senate in Nebraska's 2024 election, and is running again in 2026.⁸

⁴ 11 C.F.R. § 113.1(g)(1)(i)(H).

⁵ Advisory Op. 2001-10 (Jackson) at 3.

⁶ 11 C.F.R. § 300.2(b)(3).

⁷ 11 C.F.R. § 300.2(c)(2).

⁸ Brakkton Booker and Jordain Carney, Independent Dan Osborn Makes Another Run At Nebraska Senate, [Politico](#) (July 8, 2025).

15. Mr. Osborn is affiliated with two federal hybrid PACs: Working Class Heroes Fund and League of Labor Voters.⁹
16. On October 29, 2025, after media scrutiny of his previously filed Personal Financial Disclosure (PFD), Mr. Osborn filed an amended PFD.¹⁰ The amended form revealed his wife, Megan Osborn, had ownership interest in – and received a salary from – Independent Campaigns LLC and Dark Forest LLC.¹¹
17. The amended PFD revealed that Mr. Osborn was “funneling campaign and PAC donations into a company that his wife owns one-third of.”¹² In fact, the same media report indicates that one of Megan Osborn’s companies, Independent Campaigns LLC, received its first payment of \$50,000 from one of Mr. Osborn’s PAC’s, Working Class Heroes Fund, just two days after it was formed in January of 2025.¹³ Independent Campaigns LLC has been described as an “opaque company...which doesn’t appear to have a website and was registered in a state that does not require its owners to be identified in the public record.”¹⁴
18. The Mr. Osborn-affiliated PAC, League of Labor Voters, also pays Independent Campaigns LLC for “strategy consulting.”¹⁵
19. Inexplicably, on December 9, 2025, Mr. Osborn’s defunct U.S. Senate principal campaign committee, Osborn for Senate 2024, made a \$9,000 payment for “strategy consulting” to Megan Osborn’s Dark Forest LLC.¹⁶
20. Not only does Mr. Osborn’s campaign and affiliated PACs pay his wife’s two companies, but she has also been paid directly as well. Combined payments and reimbursements from Mr. Osborn’s campaign committees and his affiliated PACs to his wife and her companies total \$278,470.33.¹⁷

Payor	Payee	Amount
Osborn for Senate	Megan Osborn	\$71,293.04
Osborn for Senate	Independent Campaigns LLC	\$5,959.02
Osborn for Senate	Dark Forest LLC	\$9,000.00
Working Class Heroes Fund	Megan Osborn	\$2,709.86
Working Class Heroes Fund	Independent Campaigns LLC	\$166,175.41
League of Labor Voters	Independent Campaigns LLC	\$23,333.00
TOTAL: \$278,470.33		

21. The extent of Mr. Osborn’s financial outlays to family members stretches far beyond just his wife and her businesses. On information and belief, Mr. Osborn’s committees and connected PACs have paid his sister-in-law Bridget Boyle, his sister-in-law Jodi Osborn, his brother-in-law James Vihstadt, and his daughter Georgia Osborn almost \$37,000.¹⁸

⁹ [Working Class Heroes Fund](#) (Last Visited Mar. 23, 2026); *Note:* Opting-in to receive electronic communication from WCHF also provides enrollment in electronic communication from LLV.

¹⁰ United States Senate, Financial Disclosures, Mr. Daniel L. Osborn, [Candidate Report \(Amendment D\)](#), *Search Term: Daniel Osborn* (Oct. 29, 2025).

¹¹ *Id.*

¹² Andrew Wegley, Dan Osborn’s Senate Campaign, PAC Have Paid \$114K to Company Co-Owned by Wife, [Lincoln Journal Star](#) (Nov. 2, 2025).

¹³ *Id.*

¹⁴ *Id.*

¹⁵ League of Labor Voters, [Disbursements](#) (Sept. 16, 2025-Dec. 16, 2025); *See Also* note 9.

¹⁶ Osborn for Senate 2024, [Schedule B: Itemized Disbursements](#) (Dec. 9, 2025).

¹⁷ Alec Schemmel & Cameron Cawthorne, Senate Hopeful with Deep Dem Ties Has Paid Family Over \$350K from His Campaign Coffers, [Fox News](#) (Feb. 19, 2026); Osborn for Senate 2024, Working Class Heroes Fund, and Osborn for Senate, [Disbursements](#) (June 4, 2024-Sept. 9, 2025); *See Also* Osborn for Senate, [Schedule B: Itemized Disbursements](#); Osborn for Senate 2024, [Disbursements](#) (Dec. 9, 2025); Working Class Heroes Fund, [Disbursements](#) (Jan. 29, 2025-Dec. 30, 2025); League of Labor Voters, [Disbursements](#) (Sept. 16, 2025-Dec. 16, 2025).

¹⁸ Alec Schemmel & Cameron Cawthorne, Senate Hopeful with Deep Dem Ties Has Paid Family Over \$350K from His Campaign Coffers, [Fox News](#) (Feb. 19, 2026); Douglas County Clerk, [Find A Marriage License](#), *Search Term: Megan Osborn* (Last Visited Mar. 23, 2026); Sarpy County, [Marriage License Search](#), *Search Term: Bridget Morrissey* (Last Visited Mar. 23, 2026); Debbie Osborn Vihstadt, [Facebook](#) (June 11, 2024); Osborn for Senate and Osborn for Senate 2024, [Disbursements](#) (Aug. 29, 2025-Sept. 29, 2025); *See Also* Osborn for Senate, [Schedule B: Itemized Disbursements](#); Working Class Heroes Fund, [Disbursements](#) (Jan. 13, 2025-Dec. 31, 2025); League of Labor Voters, [Disbursements](#) (Sept. 18,

Payor	Payee	Amount
Osborn for Senate	Bridget Boyle (sister-in-law)	\$16,233.07
Osborn for Senate	James Vihstadt (brother-in-law)	\$2,500.00
Osborn for Senate	Georgia Osborn (daughter)	\$4,200.00
Working Class Heroes Fund	Bridget Boyle (sister-in-law)	\$9,853.15
Working Class Heroes Fund	Jodi Osborn (sister-in-law)	\$1,400.00
League of Labor Voters	Bridget Boyle (sister-in-law)	\$2,500.00
TOTAL: \$36,686.22		

22. Mr. Osborn’s comfort with graying the lines regarding financial matters is even more readily apparent when examining the close relationship under which his principal campaign committee and two affiliated hybrid PACs – Working Class Heroes Fund (“WCHF”) and League of Labor Voters (“LLV”) – operate.
23. WCHF was registered with the FEC on November 12, 2024. WCHF’s current treasurer is Mr. Osborn’s sister-in-law, Jodi Osborn. The group’s previous treasurer was Bridget Boyle (Ms. Boyle is Megan Osborn’s sister, and therefore, Mr. Osborn’s sister-in-law). Ms. Boyle is also currently paid for “treasurer services” by LLV.¹⁹
24. WCHF was “founded by Dan Osborn” to “unite and mobilize working people.” Mr. Osborn is featured prominently on the WCHF’s website, including in the “About Us” and “News” sections.²⁰
25. Individuals can “join the movement” to support WCHF’s mission by inputting their phone number and email address to be contacted by LLV.²¹
26. Brandon Philipczyk is listed as the custodian of records and designated agent for WCHF. Previously, Mr. Philipczyk was the designated agent for Osborn for Senate and the designated agent for Osborn for Senate 2024. On July 23, 2025, Osborn for Senate disclosed a payment of \$7,500 for “compliance consulting” to Bison Strategies, Mr. Philipczyk’s company.²²
27. Mr. Philipczyk is also listed as the custodian of records and treasure in the Statement of Organization filed by LLV, also on July 23, 2025.²³
28. On FEC reports filed in 2025, WCHF and LLV disclosed several individual contributions that exceeded \$5,000.²⁴ WCHF and LLV also accepted multiple corporate contributions for their non-contribution accounts, including from the shared donor American Opportunity Action, which donated \$350,000 and \$150,000 to WCHF and LLV, respectively. WCHF has also received large contributions from Contours, Inc. (\$150,000), Common Defense Civic Engagement (\$10,000), and Omaha Firefighters Local # 385 (\$5,000), while LLV received a \$100,000 contribution from Citizen Impact, a nonprofit corporation. WCHF and LLV thus received contributions in excess of federal contribution limits and from federally prohibited sources.²⁵

2025-Dec. 31, 2025); Working Class Heroes Fund, [Disbursements](#) (Sept. 12, 2025-Dec. 16, 2025); Osborn for Senate, [Disbursements](#) (July 5, 2024-Nov. 4, 2024); Osborn for Senate, [Disbursements](#) (Dec. 3, 2024).

¹⁹ Working Class Heroes Fund, [Original Statement of Organization](#) (Filed Nov. 12, 2024); Working Class Heroes Fund, [Amendment to Statement of Organization](#) (Filed July 10, 2025); Alec Schemmel & Cameron Cawthorne, Senate Hopeful with Deep Dem Ties Has Paid Family Over \$350K from His Campaign Coeffers, [Fox News](#) (Feb. 19, 2026); League of Labor Voters, [Disbursements](#) (Sept. 18, 2025-Dec. 31, 2025).

²⁰ [Working Class Heroes Fund](#) (Last Visited Mar. 23, 2026); *See Also* Brian Beach, Dan Osborn Launches Political Action Committee to Help Working Class Candidates, [Nebraska Public Media](#) (Nov. 19, 2024).

²¹ [Working Class Heroes Fund](#) (Last Visited Mar. 23, 2026).

²² Osborn for Senate, [Schedule B: Itemized Disbursements](#) (Mar. 21, 2025); Osborn for Senate, [Statement of Organization](#) (Oct. 19, 2024); Osborn for Senate, [Statement of Organization](#) (July 7, 2025); Osborn for Senate, [Disbursements](#) (July 23, 2025); Brandon Philipczyk, [LinkedIn](#) (Last Visited Mar. 23, 2026).

²³ League of Labor Voters, [Statement of Organization](#) (July 23, 2025).

²⁴ Working Class Heroes Fund, [Total Receipts: Raising](#) (Jan. 1, 2025-Dec. 31, 2025); League of Labor Voters, [Receipts](#) (Dec. 10, 2025).

²⁵ Working Class Heroes Fund, [Report of Receipts and Disbursements](#) (Jan. 31, 2026); League of Labor Voters, [Report of Receipts and Disbursements](#) (Jan. 27, 2026).

29. Additionally, WCHF received a “list donation” from Osborn for Senate 2024 valued at \$25,000 on March 21, 2025.²⁶
30. WCHF also paid Mr. Osborn a total of \$10,817.28 for salary and travel reimbursements in January 2025, shortly before he launched his 2026 Senate campaign.²⁷
31. WCHF and LLV have made total disbursements in excess of two hundred thousand dollars to Osborn for Senate’s campaign staff and Mr. Osborn’s family members.²⁸

Payor	Payee	Amount	Purpose
League of Labor Voters	Independent Campaigns LLC (wife’s company)	\$23,333.00	Strategy Consulting
League of Labor Voters	Bridget Boyle (sister-in-law)	\$2,500.00	Treasurer Services
Working Class Heroes Fund	Independent Campaigns LLC (wife’s company)	\$166,175.41	Strategy Consulting
Working Class Heroes Fund	Bridget Boyle (sister-in-law)	\$9,853.15	Treasurer Services
Working Class Heroes Fund	Megan Osborn (wife)	\$2,709.86	Mailing and Travel Reimbursement
Working Class Heroes Fund	Brandon Philipczyk’s Bison Strategies (designated agent)	\$16,510.1	Compliance consulting
TOTAL: \$221,081.52			

CAUSES OF ACTION

AGAINST RESPONDENTS DAN OSBORN, OSBORN FOR SENATE, AND VICTORIA PERRONE AS TREASURER, WORKING CLASS HEROES FUND AND JODI OSBORN AS TREASURER, AND LEAGUE OF LABOR VOTERS AND JORGE BADILLO AS TREASURER

Converting Campaign Funds for Personal Use in Violation of 52 U.S.C. § 30114(b)(1) and 11 C.F.R. § 113.2(e)

32. FEC filings show that Dan Osborn and his two campaign committees, Osborn for Senate and Osborn for Senate 2024, violated the prohibition against personal use of campaign funds by making payments to himself and to his family members or their business(es) in amounts that appear to be in excess of fair market value.
33. Osborn for Senate 2024 twice paid family members well after the date of the 2024 general election. On December 3, 2024, Osborn for Senate 2024 paid \$4,200 to Georgia Osborn, who was previously not paid by the campaign, for “assistant services.”²⁹ On December 9, 2025, Osborn for Senate 2024 paid Mr. Osborn’s wife’s company, Dark Forest LLC, \$9,000 for “strategy consulting.”³⁰
34. Mr. Osborn’s campaign committees and affiliated PACs have made frequent payments to his family members that appear to exceed the fair market value of the services rendered, in violation of FECA and Commission regulations.³¹

²⁶ Osborn for Senate, [Schedule B: Itemized Disbursements](#) (Mar. 21, 2025).

²⁷ See Working Class Heroes Fund, [Disbursements](#) (Jan. 21, 2025 and Jan. 31, 2025).

²⁸ League of Labor Voters, [Disbursements](#) (Sept. 16, 2025-Dec. 16, 2025); League of Labor Voters, [Disbursements](#) (Sept. 18, 2025-Dec. 31, 2025); Working Class Heroes Fund, [Disbursements](#) (Jan. 29, 2025-Dec. 30, 2025); Working Class Heroes Fund, [Disbursements](#) (Jan. 13, 2025-Dec. 31, 2025); Working Class Heroes Fund, [Disbursements](#) (Feb. 11, 2025); Working Class Heroes Fund, [Disbursements](#) (Feb. 20, 2025 and Aug. 11, 2025).

²⁹ Osborn for Senate, [Disbursements](#) (Dec. 3, 2024).

³⁰ Osborn for Senate 2024, [Disbursements](#) (Dec. 9, 2025).

³¹ Osborn for Senate 2024, Working Class Heroes Fund, and Osborn for Senate, [Disbursements](#) (June 4, 2024-Dec. 30, 2025); Osborn for Senate 2024, Working Class Heroes Fund, and Osborn for Senate, [Disbursements](#) (June 4, 2024-Dec. 30, 2025); Osborn for Senate 2024, Working Class Heroes Fund, Osborn for Senate, and League of Labor Voters, [Disbursements](#) (Jan. 29, 2025-Dec. 30, 2025); Osborn for Senate 2024, [Disbursements](#) (Dec. 9, 2025); Working Class Heroes Fund, Osborn for Senate, and League of Labor Voters, [Disbursements](#) (Jan. 13, 2025-Dec.

Payor	Payee	Amount
Osborn for Senate/2024	Dan Osborn	\$108,760.59
Working Class Heroes Fund	Dan Osborn	\$10,817.28
Osborn for Senate/2024	Megan Osborn	\$71,293.04
Working Class Heroes Fund	Megan Osborn	\$2,709.86
Osborn for Senate	Independent Campaigns LLC	\$5,959.02
League of Labor Voters	Independent Campaigns LLC	\$23,333.00
Working Class Heroes Fund	Independent Campaigns LLC	\$166,175.41
Osborn for Senate 2024	Dark Forest LLC	\$9,000.00
Osborn for Senate	Bridget Boyle (sister-in-law)	\$16,233.07
Working Class Heroes Fund	Bridget Boyle (sister-in-law)	\$9,853.15
League of Labor Voters	Bridget Boyle (sister-in-law)	\$2,500.00
Working Class Heroes Fund	Jodi Osborn (sister-in-law)	\$1,400.00
Osborn for Senate 2024	James Vihstadt (brother-in-law)	\$2,500.00
Osborn for Senate 2024	Georgia Osborn (daughter)	\$4,200.00
TOTAL: \$434,734.42		

35. As recently reported, Mr. Osborn “has faced criticism for funneling a significant amount of campaign funds to his family members,” especially as “critics have taken issue with the lack of political experience from Osborn’s wife,” – who worked at a sports bar – and payments to his daughter, a part-time dancer.³²
36. In Advisory Opinion 2001-10, the Commission provided guidance to a candidate who sought to employ his wife as a consultant; that would-be consultant had “worked in various positions in both campaigns and government” during her career. Megan Osborn reportedly lacks such experience, which suggests that the campaign’s payments to her for “strategy consulting” are excessive.
37. FECA and Commission regulations are clear that payments made to family members using campaign funds must be made only for *bona fide* campaign services.³³ What’s more, the payments made to family members of a candidate must reflect the fair market value of those services.³⁴
38. It rings far more dubious than mere coincidence that so many members of the Osborn family meet the Commission’s requirements of providing *bona fide* campaign services at fair market value rates—all while seemingly lacking any previous professional campaign experience. Perhaps the Osborn family is teeming with previously undiscovered, dynastic political talent, akin to the Kennedys or Roosevelts. Or perhaps Mr. Osborn has realized his ability to funnel large amounts of unchecked campaign cash to his own family.
39. Accordingly, there is reason to believe that respondents violated 52 U.S.C. § 30114(b)(1) and 11 C.F.R. § 113.2(e).

Prohibited Use of Nonfederal Funds in Connection with a Campaign for Federal Office in Violation of 52 U.S.C. § 30125(e)(1) and 11 C.F.R. § 300.61

40. Dan Osborn and his agents directly or indirectly established – and now finance, maintain, and control – Working Class Heroes Fund and League of Labor Voters. WCHF was “founded” by Mr. Osborn in November 2024. Mr. Osborn appears to have continued leading WCHF after launching his current

31, 2025); Working Class Heroes Fund, [Disbursements](#) (Sept. 12, 2025-Dec.16, 2025); Osborn for Senate 2024, [Disbursements](#) (July 5, 2024-Nov. 4, 2024); Osborn for Senate 2024, [Disbursements](#) (Dec. 3, 2024).

³² Alec Schemmel & Cameron Cawthorne, Senate Hopeful with Deep Dem Ties Has Paid Family Over \$350K from His Campaign Cooffers, [Fox News](#) (Feb. 19, 2026).

³³ 52 U.S.C. § 30114(b)(2); 11 C.F.R. § 113.1(g)(1)(i)(H).

³⁴ *Id.*

Senate campaign in July 2025. WCHF disclosed expenditures for salary and travel totaling \$10,817.28 to Dan Osborn in early 2025, shortly before Mr. Osborn announced his candidacy in Nebraska's 2026 Senate election.

41. Along with Mr. Osborn's own role in directly establishing WCHF, his sister-in-law, Jodi Osborn, is WCHF's current treasurer. Brandon Philipczyk served as the designated agent for Osborn for Senate through 2025, and created LLV in July 2025 (Philipczyk also continues to serve as designated agent and custodian of records for WCHF). On FEC filings, WCHF and Osborn for Senate list the same location in Omaha – 5418 Weir Street – as their mailing address.
42. The “overall relationship” between Dan Osborn, Osborn for Senate, WCHF, and LLV satisfies sufficient factors set forth at 11 C.F.R. § 300.2(c)(2) to conclude that WCHF and LLV were and are established, financed, maintained, and controlled by a federal candidate and his or her agents. Osborn for Senate, WCHF, and LLV all retain and compensate the same core group of individuals, which enables Mr. Osborn to control the operations of the entities.
 - As the founder of WCHF, Dan Osborn unquestionably had “an active or significant role in the formation of” WCHF;
 - WCHF, LLV, and Osborn for Senate have substantial “common or overlapping officers or employees,” including Brandon Philipczyk, Bridget Boyle, Megan Osborn, and even Dan Osborn himself, which “indicates a formal or ongoing relationship” between the committees;
 - As evidenced by WCHF and LLV's payments to many of the same individuals and vendors as Osborn for Senate and Osborn for Senate 2024, it is clear that Mr. Osborn and his campaign agents have the “authority or ability to hire, appoint, demote, or otherwise control the officers, or other decision-making employees or members of” WCHF and LLV.
 - Osborn for Senate, WCHF, and LLV have “similar patterns of receipts or disbursements that indicate a formal or ongoing relationship between” them, including the payment of common vendors, some of which are entities controlled by Dan Osborn's family members. WCHF, LLV, and Osborn for Senate have all paid his wife's company, Independent Campaigns, as well as his sister-in-law, Bridget Boyle. Both Osborn for Senate and WCHF also made payments for “compliance consulting” to Bison Strategies, which is operated by Osborn campaign consultant Bradon Philipczyk, during the 2026 cycle.
43. On March 21, 2025, Osborn for Senate 2024, Dan Osborn's campaign committee created for his 2024 Senate run, provided a “list donation” valued at \$25,000 to WCHF.³⁵ In addition to Mr. Osborn founding WCHF, Mr. Osborn's campaign committee provided WCHF with an extremely valuable asset needed to fundraise and sustain itself.
44. On July 23, 2025, Osborn for Senate disclosed a payment of \$7,500 for “compliance consulting” to Bison Strategies, Mr. Philipczyk's company. Also on July 23, 2025, Mr. Philipczyk filed the Statement of Organization for LLV, and he was listed as the PAC's custodian of records and treasurer.³⁶
45. Despite being established, financed, maintained, or controlled by federal candidate Dan Osborn and his agents, WCHF and LLV have solicited, received, directed, transferred, or spent funds that do not comply with FECA's contribution limitations, source prohibitions, and reporting requirements, including receiving contributions from individuals in excess of \$5,000 and receiving funds from prohibited sources.

³⁵ *Supra* note 26.

³⁶ *Supra* note 22 and 23.

46. Accordingly, there is reason to believe that respondents violated 52 U.S.C. § 30125(e)(1) and 11 C.F.R. § 300.61.

PRAYER FOR RELIEF

47. Wherefore, the Commission should find reason to believe that Dan Osborn, Osborn for Senate 2024, and James Vihstadt as Treasurer, Osborn for Senate and Victoria Perrone as Treasurer, Working Class Heroes Fund and Jodi Osborn as Treasurer, and League of Labor Voters and Jorge Badillo as Treasurer have violated 52 U.S.C. § 30114(b)(1) and 11 C.F.R. § 113.2(e) and 52 U.S.C. § 30125(e) and 11 C.F.R. § 300.61. The Commission should conduct an immediate investigation under 52 U.S.C. § 30109(a)(2) and determine and impose appropriate sanctions for any and all violations. Furthermore, the Commission should enjoin respondent(s) from any future violations and impose any necessary and appropriate remedies to ensure respondent(s) future compliance with FECA.

March 23, 2026

Respectfully Submitted,

Caitlin Sutherland, Executive Director
Americans for Public Trust
107 South West Street, Suite 442
Alexandria, VA 22314

VERIFICATION

48. The complainants listed below hereby verify that the statements made in the attached Complaint are, upon their information and belief, true.

For Complainant "Americans for Public Trust"



Caitlin Sutherland
Caitlin Sutherland

City of Alexandria
Commonwealth of Virginia

The foregoing instrument was subscribed and sworn to before me this 23rd day of March 2026 by Caitlin Sutherland.

Notary Public

Notary registration number: _____

My commission expires: _____