

**BEFORE THE
FEDERAL ELECTION COMMISSION**

COMMITTEE TO DEFEND)
THE PRESIDENT)
441 North Lee Street, Suite 205)
Alexandria, VA 22314)
Complainant,)
v.)
DNC SERVICES CORP. /)
DEMOCRATIC NATIONAL COMMITTEE)
430 S. Capitol Street, S.E.)
Washington, DC 20003, and)
ALEXANDRA CHALUPA)
4820 Linnean Ave. N.W.)
Washington, DC 20008-2123)
Respondents.)
_____)

VERIFIED COMPLAINT

Introduction

The Democratic Party has spent the past three years launching a series of spurious, unfounded allegations against President Donald Trump for his purported “collusion” with the Russian government and, more recently, for seeking assistance from the Ukrainian Government in investigating the corruption of then-Vice President Joe Biden during the Obama Administration. Ironically, it was the Democratic party itself that repeatedly attempted to manipulate the results of the 2016 presidential election by illegally soliciting valuable assistance from foreign governments in blatant violation of federal law.

Not content with hiring foreign agents such as Christopher Steele to attempt to solicit derogatory information about President Trump from Russian government officials and intelligence

officers, compiled into the infamous “Steele dossier,” the Democratic Party made similar efforts to solicit information it believed valuable from Ukrainian government sources, as well. The Democratic National Committee’s abhorrent pattern of conduct throughout the 2016 election demonstrates that it will collaborate with any foreign government; accept any information from any source, no matter how unbelievable; violate any campaign finance law; and generally stoop to any depth in a desperate attempt to win power, defeat President Trump, and impose its bizarre, dystopian, socialist, identity-politics-obsessed postmodern globalist worldview on the American public.

This Commission already has refused to take action against the DNC’s conspiracy with Hillary Clinton’s campaign committee to launder nearly \$80 million through state parties to circumvent campaign contribution limits and reporting requirements. *See Hillary Victory Fund*, MUR #7304 (Apr. 25, 2019); *Hillary Victory Fund*, MUR #7331 (Apr. 29, 2019). If the Commission continues to refuse to enforce campaign finance law against the DNC, there will be no limit to the campaign finance violations the DNC will commit in support of the Democratic Party’s presidential candidate in the 2020 election.

Parties

1. Complainant COMMITTEE TO DEFEND THE PRESIDENT is an unauthorized, non-connected hybrid political committee with a *Carey* account, with its principal place of business in Alexandria, Virginia.

2. Respondent DNC SERVICES CORP. / DEMOCRATIC NATIONAL COMMITTEE (hereafter, “DNC”) is a national political party committee for the Democratic Party with its principal place of business in Washington, D.C.

3. Respondent ALEXANDRA CHALUPA's is a former contractor with the Democratic National Committee whose principal place of business is in Washington, D.C.

Alleged Violations of FECA

4. The DNC hired Alexandra Chalupa as a contractor and political consultant in connection with the 2016 presidential election. Among other things, the DNC tasked Chalupa with obtaining incriminating or derogatory information about Donald Trump, who received the Republican Party's nomination for President and ultimately won the election; Paul Manafort, who served for a brief time as chairman of the Trump campaign; and potentially other members of the Trump campaign staff, as well. Kenneth P. Vogel & David Stern, *Ukrainian Efforts to Sabotage Trump Backfire: Kiev Officials are Scrambling to Make Amends with the President-Elect After Quietly Working to Boost Clinton*, POLITICO (Jan. 11, 2017, 5:05 A.M. ET), <https://www.politico.com/story/2017/01/ukraine-sabotage-trump-backfire-233446>.

5. As an agent and contractor of the DNC, in the course of performing her duties to the DNC, Chalupa solicited members of the Ukrainian government to obtain, compile, and provide her with valuable information about Manafort's work and activities in Ukraine. Vogel & Stern, *supra*; John Solomon, *Ukrainian Embassy Confirms DNC Contractor Solicited Trump Dirt in 2016*, THE HILL (May 2, 2019, 7:00 P.M.), <https://thehill.com/opinion/white-house/441892-ukrainian-embassy-confirms-dnc-contractor-solicited-trump-dirt-in-2016>.

6. Ukrainian Ambassador to the United States Valeriy Chaly confirmed that Chalupa requested the Ukrainian government provide her information about Manafort. Vogel & Stern, *supra*; Solomon, *supra*.

7. On a separate occasion, Chalupa—as an agent and contractor of the DNC, in the course of performing her duties to the DNC—solicited Ukrainian officials to have then-President

of Ukraine, Petro Poroshenko, provide a valuable service to the DNC and provide valuable information to the DNC by:

- a. commenting on Manafort's ties to Russia and/or the Russian government, and/or
- b. having Poroshenko or another Ukrainian government official ask a Member of the U.S. Congress to hold hearings on Manafort and his work in Russia.

Gregg Re, *Ukraine Embassy Says DNC Operative Reached Out for Information on Trump Campaign in 2016*, FOX NEWS (May 4, 2019), <https://www.foxnews.com/politics/ukraine-embassy-dnc-operative-trump-dirt-2016>; see also Vogel & Stern, *supra*; Solomon, *supra*.

8. The DNC encouraged Chalupa to meet with Poroshenko to ask that he provide these things and services of value, to bolster Clinton's campaign efforts. Vogel & Stern, *supra*; Solomon, *supra*.

9. The Ukrainian embassy concluded that Chalupa was asking the Ukrainian government to engage in inappropriate interference with the conduct of the American presidential elections. Ukrainian officials nevertheless provided Chalupa with valuable information directly relevant to Trump and/or Manafort while the 2016 presidential election was in full swing. Gregg Re, *Giuliani Will Travel to Ukraine, Saying Country's Probes May Be "Very, Very Helpful" for Trump*, FOX NEWS (May 10, 2019), <https://www.foxnews.com/politics/giuliani-will-travel-to-ukraine-saying-countrys-probes-may-be-very-very-helpful-for-trump>; see also Vogel & Stern, *supra*; Solomon, *supra*.

10. A top aide to Ukrainian Ambassador Chalupa, Oksana Shulyar, directed a political officer at the Ukrainian Embassy in the United States, Andrii Telizhenko, to help Chalupa research connections among Trump, Manafort, and Russia and provide Chalupa with any information he

discovered. Teliznhenko did so, and even met in person with Chalupa to brief her on developments in the investigation into Manafort. Vogel & Stern, *supra*; Solomon, *supra*.

11. In or around May 2016, Chalupa e-mailed DNC Research Director Lauren Dillon and DNC Communications Director Luis Miranda that she had sensitive information about Manafort that she wished to share in person. Vogel & Stern, *supra*.

12. A Ukrainian court has ruled that the Ukrainian National Anti-Corruption Bureau and Ukrainian Parliamentarian Serhiy Leschchenko wrongly interfered with the 2016 U.S. presidential election by releasing documents relating to Manafort specifically to benefit Hillary Clinton. See Matthew Kupfer, *Update: Publication of Manafort Payments Violated Law, Interfered in US Election, Kyiv Court Rules*, KYIV POST (Dec. 12, 2018, 2:45 P.M.), <https://www.kyivpost.com/ukraine-politics/publication-of-manafort-payments-violated-law-interfered-in-us-election-kyiv-court-rules.html>.

Count I
Unlawful Solicitation of Contributions or Donations from a Foreign National
Violation of 52 U.S.C. § 30121(a)(2) and 11 C.F.R. § 110.20(g)

14. Complainant re-alleges the allegations of the foregoing paragraphs as if set forth fully herein.

15. Federal law provides, “It shall be unlawful for . . . a person to solicit, accept, or receive a contribution or donation” that is from a foreign national when either:

- a. the contribution or donation is a thing of value, or
- b. the contribution or donation is made to a political party committee. 52

U.S.C. § 30121(a)(2); *see also* 11 C.F.R. § 110.20(g).

16. Chalupa was a contractor and/or agent of the DNC who solicited foreign nationals, including representatives and members of the Ukrainian government, for contributions or donations.

17. The contributions or donations Chalupa solicited included:

- a. valuable derogatory information about Trump and/or Manafort;
- b. the services of members of the Ukrainian government in investigating and obtaining valuable derogatory information about Trump and/or Manafort;
- c. having members of the Ukrainian government solicit members of the U.S. Congress to hold hearings on Manafort; and
- d. having the Ukrainian President make public statements about Manafort.

18. Chalupa's solicitations also constituted requests for prohibited contributions from foreign nations, including the Ukrainian government, as well as representatives and members of the Ukrainian government, to the DNC.

19. The DNC authorized and was aware of Chalupa's activities, received information from Chalupa that she obtained from foreign nations, and was updated by Chalupa on her interactions with the Ukrainian government.

WHEREFORE Respondents violated 52 U.S.C. § 30121(a)(2).

CONCLUSION

For these reasons, Complainant Committee to Defend the President respectfully requests the Federal Election Commission commence enforcement proceedings against Respondents DNC Services Corp. / Democratic National Committee and Alexandra Chalupa.

VERIFICATION

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

Dated September 27, 2019

Respectfully submitted,



Dan Backer, Esq.
POLITICAL.LAW PLLC
441 N. Lee Street, Suite 300
Alexandria, VA 22314
(202) 210-5431
dan@political.law
*Counsel for Complainant
Committee to Defend the President*

COMPLETED BEFORE A NOTARY PUBLIC

State of Virginia

City of Alexandria

County of City of Alexandria



Subscribed and sworn to before me on this 27th day of September, 20 19.

My Commission expires on 01/31/23.

7660433

