

**BEFORE THE  
FEDERAL ELECTION COMMISSION**

Defend The Vote  
600 Pennsylvania Ave, SE Unit 15180  
Washington, DC 20003

Complainant,

v.

McMorrow for Michigan  
P.O. Box 226  
Royal Oak, MI 48068

Respondents.

**COMPLAINT**

This complaint is filed pursuant to 52 U.S.C. § 30109(a)(1) against McMorrow for Michigan for violations of the Federal Election Campaign Act of 1971, as amended (the “*Act*”) and Federal Election Commission (“*FEC*” or “*Commission*”) regulations. The most foundational legal requirement the Act places on federal candidates is public disclosure of their campaign spending, including campaign operating expenses and debt. Despite these disclosure requirements, State Sen. Mallory McMorrow’s campaign has placed up to \$773,904 of advertising on the platform Meta without disclosing sufficient payments made for the advertising or debt owed to cover the advertising costs. This glaring error in her public reports raises serious questions about her compliance with the Act’s reporting requirements. Worse, it raises reason to believe a corporate vendor may have illegally fronted those advertising costs for her campaign to inflate her reported cash on hand on filing day. And in fact, the amount at issue, up to \$773,904 is 61% percent of her total disclosed campaign operating expenses during the relevant reporting period. The FEC should immediately investigate Respondents’ apparent violations and take appropriate remedial measures.

## FACTUAL BACKGROUND

Mallory McMorrow is a candidate in the Democratic primary election for U.S. Senate in Michigan.<sup>1</sup> Her principal campaign committee is McMorrow for Michigan (the “*McMorrow Campaign*” or the “*Campaign*”).<sup>2</sup> According to publicly available information, the McMorrow Campaign spent at least \$631,800.00 and up to \$773,904.00 on advertising on the platform Meta that ran between January 1, 2026 and March 31, 2026.<sup>3</sup> Yet, the April Quarterly disclosure report the Campaign filed with the FEC covering activity from January 1, 2026 through March 31, 2026 (the “*Report*”) fails to disclose this level of advertising spending, either as an operating expenditure or as debt.<sup>4</sup>

The Campaign disclosed a total of \$1,261,907.79 in operating expenditures on the Report.<sup>5</sup> But the Campaign only itemized one operating expenditure on the Report for the purpose of advertising or media—to Authentic Campaigns on March 31, 2026 for \$100,000 with the purpose of “Digital Advertising.”<sup>6</sup> The Campaign did not report any debts or obligations owed by the committee on the Report.<sup>7</sup> Therefore, between January 1, 2026 and March 31<sup>st</sup>, 2026 the Campaign had run digital ads on Meta that cost at least \$631,800.00 and up to \$773,904, yet reported a mere \$100,000 in advertising expenses on its FEC report covering that same period.

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<sup>1</sup> Fed. Election Comm’n., Mallory McMorrow, FEC Form 2 (filed February 24, 2026), <https://docquery.fec.gov/pdf/482/202602249837848482/202602249837848482.pdf>.

<sup>2</sup> *Id.*

<sup>3</sup> Mallory McMorrow, Meta Ad Library,

[https://www.facebook.com/ads/library/?active\\_status=all&ad\\_type=political\\_and\\_issue\\_ads&country=US&is\\_targeted\\_country=false&media\\_type=all&search\\_type=page&sort\\_data\[mode\]=relevancy\\_monthly\\_grouped&sort\\_data\[direction\]=desc&start\\_date\[min\]=2026-03-02&start\\_date\[max\]=2026-04-01&view\\_all\\_page\\_id=499972063684687](https://www.facebook.com/ads/library/?active_status=all&ad_type=political_and_issue_ads&country=US&is_targeted_country=false&media_type=all&search_type=page&sort_data[mode]=relevancy_monthly_grouped&sort_data[direction]=desc&start_date[min]=2026-03-02&start_date[max]=2026-04-01&view_all_page_id=499972063684687) (“McMorrow Meta Ad Library”).

<sup>4</sup> Fed. Election Comm’n., McMorrow for Michigan, FEC Form 3 (filed April 15, 2026) (“April Quarterly Report”).

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

<sup>6</sup> *Id.* There are two other payments to Authentic Campaigns on the Report totaling \$18,000 for “Digital Fundraising Consulting.” *Id.* The Campaign also reported several disbursements for various forms of consulting and graphic design totaling \$116,723.28, though there is no evidence these are related to media buy payments. *Id.*

<sup>7</sup> *Id.*

Apart from the April Quarterly report, the Campaign only disclosed one other payment for direct advertising costs during the entire election cycle: a \$25,010.81 payment to Thematic Campaigns for “Media Advertising” in April 2025.<sup>8</sup> And if you look at the Meta advertising for the entire duration of the Campaign, the numbers are staggering. Starting at the beginning of the campaign and ending on March 31<sup>st</sup>, 2026, the Campaign ran digital ads on Meta that cost at least \$1,146,800 and up to \$1,422,490. Yet, the grand total of advertising costs reported is only \$125,000.

It is far and away standard practice among U.S. Senate candidates to hire a digital advertising firm to place advertising on their behalf. And in fact, the McMorrow Campaign’s reporting demonstrates it was using firms for this exact service.<sup>9</sup> Standard commercial practice among digital advertising firms is to require the client to pay the firm *in advance, at the time the advertising reservation is made* to ensure the firm has the necessary cash on hand to then pay the advertising platform, like Meta. Therefore, assuming the McMorrow Campaign used Authentic or another digital advertising firm to purchase its advertising with Meta, standard commercial practices dictate it should have paid for all of the advertising run in January, February and March by the time of the Report.

In the unlikely event that the McMorrow Campaign was in fact purchasing its own advertising from Meta, the available information still indicates it violated the Act. Even the special payment terms offered by Meta to its favored business clients dictate that Meta invoice the client at the beginning of each month for advertising run during the previous month, with thirty days for the client to pay the invoice.<sup>10</sup> If the McMorrow Campaign placed its own

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<sup>8</sup> The Campaign made one payment for “Media Advertising” to “Thematic Campaigns” on April 28, 2025 for \$25,010.81, available at <https://docquery.fec.gov/cgi-bin/fecimg/?202510159791272254>.

<sup>9</sup> McMorrow Meta Ad Library

<sup>10</sup> Facebook, About monthly invoicing billing periods, <https://www.facebook.com/business/help/951662943681982>.

advertisements and qualified for this special arrangement, its reporting still fails to comply with the Act. For example, advertising that ran in the month of January—between \$235,700 and \$287,890.00—would have been invoiced at the start of February, with the bill for the advertising due within thirty days and past due by March 31, 2026, close of books on the Report.

## LEGAL ANALYSIS

The Act requires a campaign committee to report both its operating expenses and its debt on regular reports filed with the Commission. A campaign must disclose on each report the name and address of each person to whom an expenditure in an aggregate amount or value in excess of \$200 within the election cycle is made to meet a candidate operating expense, together with the date, amount, and purpose of such operating expenditure.<sup>11</sup> Additionally, each report must disclose “the amount and nature of outstanding debts and obligations owed” by the campaign.<sup>12</sup> A debt or obligation includes a “written contract, written promise or written agreement to make an expenditure” and is reportable as of the date on which the debt or obligation is incurred.<sup>13</sup> Even when “the exact amount of a debt or obligation is not known, the report shall state that the amount reported is an estimate.”<sup>14</sup>

The Meta advertising library makes clear the Campaign has placed between \$631,800 and \$773,904 of paid digital advertising on Meta through January of 2026 to March of 2026. Yet, it has reported a mere \$100,000 in digital advertising expenses on its Report covering that time. In the highly likely scenario where the Campaign used a digital advertising firm to place its advertisements, standard commercial practices dictate it would have owed the full amount of the Meta advertising costs to that firm by close of books on the Report. Under these circumstances, it

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<sup>11</sup> 52 § 30104(b)(5)(A), (6); *See* 11 C.F.R. § 104.3(b)(4).

<sup>12</sup> 52 U.S.C. § 30104(b)(8).

<sup>13</sup> 11 C.F.R. § 104.11(b).

<sup>14</sup> *Id.*

should have reported either operating expenditures or debt covering at least \$631,800 and up to \$773,904 in advertising costs. Even assuming the unlikely scenario where the Campaign placed its own advertising and benefitted from Meta's practice of extending a line of credit, public information suggests at least \$235,700 in fees would have been past due by the Report and therefore reportable as debt. Therefore, the available information suggests the Campaign violated the Act's reporting requirements in a significant manner.

Further, if the Campaign in fact used a digital advertising firm to place the advertising and did not pay the firm for the full advertising costs upfront, it likely received a prohibited corporate contribution from the firm. Under the Act, corporations are prohibited from making a contribution to a candidate.<sup>15</sup> A "contribution" expressly includes an advance.<sup>16</sup> Commission regulations provide a narrow exception to this rule, allowing a corporate vendor to advance funds on behalf of a campaign without making a prohibited contribution only where the credit was extended in the ordinary course of the corporation's business on terms that are substantially similar to extensions of credit to nonpolitical debtors of similar risk and size of obligation. In evaluating whether an extension of credit is in the ordinary course of business, the Commission is required to additionally consider "[w]hether the extension of credit conformed to the usual and normal practice in the commercial vendor's trade or industry."<sup>17</sup> It is patently unbelievable that the ordinary course of any vendor's business is to extend credit of over \$700,000 on behalf of a campaign whose entire operating budget during the same period was \$1,261,907.79. The size of such an outlay for such a significant period of time is an untenable level of financial risk that could render a company bankrupt. Moreover, such a practice is the opposite of the ordinary course of business in the same trade or industry. Therefore, if the Campaign's vendor in fact

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<sup>15</sup> 52 U.S.C. § 30118(a); 11 C.F.R. § 114.2(a).

<sup>16</sup> 52 U.S.C. § 30101(8)(A)(i).

<sup>17</sup> 11 C.F.R. § 116.3(c).

advanced the Meta advertising costs, it resulted in a prohibited corporate contribution to the Campaign.

**REQUESTED ACTION**

The Act’s disclosure requirements enable the public to be fully informed on matters of acute public interest—the raising and spending of federal campaign funds. The Campaign’s apparent failure to properly disclose basic spending information raises serious questions about the accuracy of its reports and whether any campaign activity is being intentionally concealed. In light of the foregoing, the Commission should immediately investigate the Campaign’s failure to report any operating expenditures and debt. If violations are found, we respectfully request that the Commission enjoin Respondents from further violations and take all necessary remedial measures to ensure the Campaign’s compliance with public disclosure requirements.

Sincerely,

Brian Lemek

Executive Director

Defend The Vote

600 Pennsylvania Ave, SE Unit 15180

Washington, DC 20003

SUBSCRIBED AND SWORN to before me this 23rd day April of 2026.

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Notary Public

My Commission Expires:

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