



FACT

FOUNDATION FOR
ACCOUNTABILITY
AND CIVIC TRUST

March 12, 2026

Ms. Lisa J. Stevenson
Acting General Counsel
Office of the General Counsel
Federal Election Commission (FEC)
1050 First Street, NE
Washington, D.C. 20463

Via Email: EnfComplaint@fec.gov

Re: Enforcement Complaint against Standing for Texas, P.O. Box 3410416, Austin, TX 78731 and Hunt for Senate, 1707 ½ Post Oak Boulevard #525, Houston, TX 77056

Dear Ms. Stevenson,

The Foundation for Accountability and Civic Trust (FACT) is a nonprofit organization dedicated to promoting accountability, ethics, and transparency in government and civic arenas. This complaint is filed pursuant to 52 U.S.C. § 30109(a)(1) and is based on information and belief that there is reason to believe Standing for Texas failed to comply with the registration and reporting requirements under the Federal Election Campaign Act, which requires every group that raises or spends \$1,000.00 for the purpose of influencing a federal election to register as a political committee and file regular reports detailing contributions and expenditures. Public records show, and an investigation will confirm, that Standing for Texas has funded and disseminated five television advertisements that were intended to influence the 2026 U.S. Senate primary election in Texas without ever registering as a political committee or filing the required disclosure reports, in violation of 11 CFR §§ 102.1(d) and 104.1(a).

If Standing for Texas produced these advertisements without any coordination with the Hunt campaign, then they are unreported independent expenditures in violation of 11 CFR § 104.4(b)(2). If Standing for Texas produced these advertisements with the material involvement of or after substantial discussion with agents of Hunt for Senate, then both entities have failed to

report (unlawful corporate) in-kind contributions in violation of 11 CFR §§ 104.3(a)(4) and 114.2(b). Finally, if the Commission determines that Standing for Texas is not operating as a political committee, then the organization has still disseminated electioneering communications within 30 days of the Texas primary election without filing the required statements in violation of 11 CFR § 104.20(b). Based upon publicly available information, it is clear that Standing for Texas has committed at least one of the previously listed violations of the Federal Election Campaign Act, and a Commission investigation is necessary to determine which violation has occurred.

FACTS

The 501(c)(4) organization Standing for Texas was incorporated in Texas on March 12, 2025.¹ Over the subsequent twelve months, the organization has engaged in minimal public activity. Standing for Texas has, however, produced and distributed five television advertisements touting various aspects of Rep. Wesley Hunt’s biography.² Although none of the advertisements expressly reference the Republican primary election in which Hunt was running as a candidate, each ad portrayed Hunt in a positive light and contrasts him against unnamed “fence-sitters,”³ “some Texas politicians [who] said Trump’s border wall made no sense,”⁴ and “career politicians.”⁵ When the final ad pejoratively references “career politicians,” it simultaneously displays a video of one of Hunt’s primary opponents Senator John Cornyn onscreen, directly contrasting the two candidates.⁶

According to AdImpact, as of February 25, 2026, Standing for Texas has spent a total of **\$4,413,161.00** to distribute the five advertisements described above on broadcast television and

¹ Tex. Sec’y of State, Franchise Tax Account Status—Standing for Texas, available at: <https://comptroller.texas.gov/taxes/franchise/account-status/search/32099256193>.

² Copies of all five advertisements are available at the following links:

- Thank Him: <https://adm0.page.link/dKsC>
- Backing Trump: <https://adm0.page.link/Sp8R>
- Fighting for Texas Families: <https://adm0.page.link/CkUA>
- From Day One: <https://adm0.page.link/mo4q>
- Thank Hunt: <https://adm0.page.link/e4Aq>

³ AdImpact, *Standing for Texas—From Day One*, <https://adm0.page.link/mo4q>

⁴ AdImpact, *Standing for Texas—Backing Trump*, <https://adm0.page.link/Sp8R>

⁵ AdImpact, *Standing for Texas—Thank Him*, <https://adm0.page.link/dKsC>

⁶ *Id.* at 0:18-0:22.

CTV. It does not appear that the organization has engaged in any other activities whatsoever; the only references to “Standing for Texas” appearing in the news media consist of articles discussing its activities supporting Hunt’s candidacy in the 2026 Texas U.S. Senate primary. Importantly, Standing for Texas only became engaged in supporting Mr. Hunt as the Republican primary election drew near, and the organization has never engaged in previous support of Mr. Hunt nor has it produced any advertisements praising any other elected official or advocating for any specific issue. Although Standing for Texas has not yet filed its first Form 990 annual return, and therefore the full scope of its activities cannot yet be independently verified, these five political advertisements are the sole organizational activity that appears in the public record.

However, the Hunt campaign and Standing for Texas have been communicating, discreetly “sharing strategic information, private polling, messaging advice and media-buying data” via two **anonymous accounts** on the social media platform X.⁷ “The two accounts were both created in October 2025, the month when Mr. Hunt entered the Senate contest. The messages and requests have been quite explicit.”⁸ At times, the messages between the two accounts were conversational. For instance, the account linked to the Hunt campaign asked for “fresh data” of “how he and his opponents are doing in the general election,” to which the account linked to Standing for Texas responded that the data would be “expected for Monday” and then posted a poll less than a week later.⁹ The account linked to the Hunt campaign “posted a screenshot of a handwritten note with information on how much money and where to invest in TV advertising—‘\$500k for 800 points’ in ‘Houston.’ There was also a suggestion on the three specific talking points to hit [Hunt’s primary opponent].”¹⁰

⁷ Shane Goldmacher, *How Wesley Hunt of Texas is Working in Plain Sight with Outside Groups*, N.Y. Times (Feb. 28, 2026), <https://www.nytimes.com/2026/02/28/us/politics/wesley-hunt-texas-senate-race-campaign-finance.html>.

⁸ *Id.*

⁹ *Id.*

¹⁰ *Id.*

APPLICABLE LAW

FEC regulations define “political committee” to encompass “any committee, club, association, or other group of persons which receives contributions aggregating in excess of \$1,000 or which makes expenditures aggregating in excess of \$1,000 during a calendar year[.]”¹¹ “Contribution” means any “gift, subscription, loan [], advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for Federal office,” including “all in-kind contributions.”¹² “Expenditure” means any “purchase, payment, distribution, loan [], advance, deposit, or gift of money or anything of value, made by any person for the purpose of influencing any election for Federal office[.]”¹³

Within 10 days of becoming a political committee (i.e., within 10 days of receiving at least \$1,000.00 in contributions or making at least \$1,000.00 in expenditures for the purpose of influencing any election for federal office) an organization is required to file a Statement of Organization with the Federal Election Commission.¹⁴ After registering with the Commission, each political committee is required to file regular public disclosure reports.¹⁵ Political committees that are not authorized by any federal candidate must file reports at least semi-annually during a non-election year (by July 31 and January 31), and quarterly during an election year.¹⁶ Among other categories of information required in these reports, each political committee is required to disclose the identity of any person who has contributed, as well as the identity of any person that the committee has paid more than \$200 in the aggregate during a calendar year.¹⁷

In addition to the regular reports described above, political committees must file additional reports whenever they make independent expenditures. “Independent expenditures” are “a communication expressly advocating the election or defeat of a clearly identified

¹¹ 11 C.F.R. § 100.5(a).

¹² *Id.* §§ 100.52(a), (d)(1).

¹³ *Id.* § 100.111(a).

¹⁴ *Id.* § 102.1(d).

¹⁵ *Id.* § 104.1(a).

¹⁶ *Id.* §§ 104.5(c)(1), (2).

¹⁷ *Id.* §§ 104.3(a)(4)(i), 104.3(b)(3)(i).

candidate that is not made in cooperation, consultation, or concert with, or at the request or suggestion of, a candidate, a candidate's authorized committee, or their agents[.]”¹⁸ If a communication contains express advocacy but *is* made in coordination with the agents of a campaign, then it is “an in-kind contribution to . . . the candidate . . . with whom . . . it was coordinated and must be reported as an expenditure made by that candidate[.]”¹⁹ Committees that make independent expenditures aggregating \$10,000.00 or more in a calendar year must file reports no later than 11:59 p.m. Eastern Time “on the second day following the date on which the communication is publicly distributed or otherwise publicly disseminated.”²⁰ For independent expenditures made fewer than 20 days before an election, the required reports must be filed within 24 rather than 48 hours.²¹

Additionally, other groups (even those that do not qualify as political committees, such as nonprofit organizations that primarily fund non-political exempt activities) are also required to file reports with the Commission if they fund certain “electioneering communications.” FEC regulations define “electioneering communications” to include “any broadcast, cable, or satellite communication that: (1) refers to a clearly identified candidate for Federal office; (2) is publicly distributed . . . within 30 days before a primary or preference election . . . for the office sought by the candidate, and the candidate referenced is seeking the nomination of that political party; and (3) is targeted to the relevant electorate, in the case of a candidate for Senate[.]”²² Each group that funds electioneering communications aggregating in excess of \$10,000.00 during any calendar year is required to file a statement with the Commission disclosing certain information about the communication by 11:59 p.m. Eastern Time on the day following the communication's public distribution.²³ This filing obligation applies to any group that funds electioneering communications, even if it is not otherwise required to register and report with the Commission.

¹⁸ *Id.* § 100.16(a).

¹⁹ *Id.* § 109.20(b).

²⁰ *Id.* § 104.4(b)(2).

²¹ *Id.* § 104.4(c).

²² *Id.* § 100.29(a).

²³ *Id.* §§ 104.20(a), 104.20(b).

ANALYSIS

Based upon the publicly available evidence compiled, it appears that Standing for Texas existed primarily to support Wesley Hunt's Senate candidacy rather than to advance any permissible non-political exempt purpose. A viewer watching these ads would naturally assume that they were being encouraged to support Hunt in the March 3, 2026 U.S. Senate primary election, particularly since one of the ads directly contrasted Hunt against one of his primary opponents, Senator Cornyn. In light of the relevant context, each of the five television advertisements that Standing for Texas has funded constitute the functional equivalent of express advocacy because the ads are "susceptible of no reasonable interpretation other than an appeal to vote for . . . a clearly identified Federal candidate."²⁴ Because it does not appear that Standing for Texas has engaged in any public activity beyond the pro-Hunt television advertising described in this complaint, the organization has spent more than \$4 million attempting to influence a federal election and should therefore have registered as a political committee within 10 days of airing its first advertisement on March 28, 2025.

The evidence also indicates that Standing for Texas's advertisements were produced in coordination with agents of Hunt for Senate. Each advertisement includes a standard paid-for-by disclaimer but does not state whether the ad was authorized by a federal candidate pursuant to 11 C.F.R. § 110.11(b). However, there is evidence in the public record that Hunt or his agents were involved in the creation of Standing for Texas, because Hunt claimed in a radio interview on the day that he announced his Senate candidacy that: "We started this project a while back ago. . . . [W]e started raising money and started running ads throughout the entire state of Texas to get our name ID up. . . . *We have spent \$6 million.*"²⁵ This is an interesting admission, because as of the date of that interview, Hunt for Senate had only spent \$1.7 million during the preceding nine months to air television advertisements in Texas according to data from an ad tracking service, AdImpact.²⁶ Standing for Texas, by contrast, had spent \$2.6 million on television advertising

²⁴ *Id.* § 109.21(c)(5).

²⁵ The Michael Berry Show (@themichaelberryshow), *Czar Talks With Texas Congressman Wesley Hunt As They Discuss His Run For The U.S. Senate* (YouTube Oct. 7, 2025), <https://www.youtube.com/watch?v=VSXdKWq6UiA&t=54s> (emphasis added).

²⁶ AdImpact (search for ads from Advertiser "Hunt for Senate" between 01/01/25 and 10/07/25).

boosting Hunt during the same time period.²⁷ Hunt’s references to “this project” is Standing for Texas.²⁸ Thus, the clear implication from the candidate himself is that the “we” referenced his campaign **and** Standing For Texas combined.

In addition, shockingly, interactions between agents of Hunt’s campaign and Standing for Texas had continued without ceasing in the months since Hunt announced his candidacy. The *New York Times* recently revealed that representatives of the Hunt campaign and Standing for Texas have been **discreetly** “sharing strategic information, private polling, messaging advice and media-buying data” via two **anonymous accounts** on the social media platform X.²⁹ This scenario differs significantly from the practice (incorrectly) blessed by four FEC Commissioners in MUR 7700 (VoteVets), in which an agent of a presidential campaign posted a single tweet stating his preference for specific messaging to air in a specific state but did not otherwise directly communicate with agents of an outside group.³⁰ In that case, the Commissioners emphasized it’s decision relied on the fact that “the statement was made to the general public.”³¹ Here, by contrast, the participants intentionally concealed their identities from the public, communicated using coded language, and actively had digital exchanges back-and-forth to share strategic information and data.³² Given the apparent subterfuge at play, this is more akin to “requests or suggestions made to a select audience, [] not those offered to the public generally”

²⁷ AdImpact (search for ads from Advertiser “Standing for Texas” between 01/01/25 and 10/07/25); Shane Goldmacher, *How Wesley Hunt of Texas is Working in Plain Sight with Outside Groups*, N.Y. Times (Feb. 28, 2026), <https://www.nytimes.com/2026/02/28/us/politics/wesley-hunt-texas-senate-race-campaign-finance.html> (“[Standing for Texas] spent millions of dollars on pro-Hunt ads before he entered the race, according to AdImpact, an ad tracking service.”).

²⁸ Shane Goldmacher, *How Wesley Hunt of Texas is Working in Plain Sight with Outside Groups*, N.Y. Times (Feb. 28, 2026), <https://www.nytimes.com/2026/02/28/us/politics/wesley-hunt-texas-senate-race-campaign-finance.html> (“Mr. Hunt has not been shy about his alliance with Standing for Texas. In a radio interview the day after he entered the race, he said: “We started this project a while back ago,” because Mr. Cornyn was vulnerable.”).

²⁹ Shane Goldmacher, *How Wesley Hunt of Texas is Working in Plain Sight with Outside Groups*, N.Y. Times (Feb. 28, 2026), <https://www.nytimes.com/2026/02/28/us/politics/wesley-hunt-texas-senate-race-campaign-finance.html>.

³⁰ MUR 7700 (VoteVets, *et al.*), Statement of Reasons of Chairman Allen J. Dickerson, Commissioners Sean J. Cooksey, James E. “Trey” Trainor, III, & Ellen L. Weintraub at 4-5.

³¹ *Id.*

³² Shane Goldmacher, *How Wesley Hunt of Texas is Working in Plain Sight with Outside Groups*, N.Y. Times (Feb. 28, 2026), <https://www.nytimes.com/2026/02/28/us/politics/wesley-hunt-texas-senate-race-campaign-finance.html>. (““Wow, half of Johnny’s support comes from the cowboys,” read one post in December, linking to a poll. It was an apparent reference to the Dallas media market where the Cowboys football team plays.”).

which the Commission has previously held constitute coordination.³³ In other words, there is a stark difference between groups using campaign statements made to the public generally and candidates illegally coordinating with outside entities in public—committing a crime in public does not excuse the crime.

A Commission investigation is necessary to determine whether impermissible coordination occurred here, because, if it did, the ads clearly constitute unreported in-kind contributions to Hunt for Senate in violation of 11 CFR § 104.3(a)(4). Of course, if the ads were coordinated, then they present an additional violation of the Act, because Standing for Texas is a nonprofit corporation that cannot legally make contributions (whether direct or in-kind) to federal candidates.³⁴ Even if no coordination occurred, which here the evidence clearly disputes, Standing for Texas has still made more than \$4 million in independent expenditures that it failed to timely report within 48 hours of each distribution, thereby violating 11 CFR § 104.4(b)(2).

However, even if the Commission concludes after a full investigation that Standing for Texas has not functioned as a political committee, the organization has still committed separate violations of the Federal Election Campaign Act. This is because each of the five advertisements funded by Standing for Texas (1) expressly refer to Hunt, who is a current candidate for U.S. Senate, (2) were publicly distributed within 30 days of the relevant Texas primary election on March 3, 2026, and (3) were targeted to the relevant Texas electorate, each also constitutes a reportable “electioneering communication” within the meaning of the Act.³⁵ According to AdImpact data, Standing for Texas has spent well in excess of \$10,000.00 distributing each of the advertisements referenced herein, amounting to more than \$4 million total. Therefore,

³³ MUR 7700 (*VoteVets, et al.*) at 2 (quoting *Coordinated and Independent Expenditures*, 68 Fed. Reg. 421, 431-32 (Jan. 3, 2003)).

In several cases, the Commissioners have failed to find coordination by simply relying on the fact a “request or suggestion” was made in public on a website or social media account. *See Vote Vets*, MUR 7681, *Vote Vets*, MUR 7715. This conclusion, however, is not consistent with the plain language of the law. The publicly-available-information safe harbor only applies to information obtained from a public source, not to a request or suggestion for specific advertising made on a public platform. 11 C.F.R. § 109.21. These erroneous decisions have allowed for illegal coordination so long as done in public, which is clearly contrary to the law.

³⁴ 11 C.F.R. § 114.2(b). It is also unclear from the public record whether Standing for Texas has raised funds consistent with federal contribution limits and source prohibitions, which would present a separate problem if the organization has made in-kind contributions to federal candidates.

³⁵ *Id.* § 100.29(a). AdImpact reports the top markets in which each of Standing for Texas’s advertisements aired, and the majority of those markets are cities within the State of Texas.

Standing for Texas should have at the very least filed electioneering communications statements with the Commission within 24 hours of publicly distributing each ad within the 30-day pre-primary window, however it has totally failed to comply with this obligation thus far.

Nearly a year has elapsed since the date that Standing for Texas should have filed its Statement of Organization with the Commission. In that time, the organization has missed two filing deadlines on which it should have filed semi-annual disclosure reports detailing the identity of its contributors, as well as multiple occasions on which it should have filed 48-hour independent expenditure reports. Even if Standing for Texas is not a political committee, it has still failed to timely file electioneering communication statements for the advertisements that it has publicly distributed in Texas within the 30-day pre-primary window. Simply put, it is not legal to create an entity out of thin air, then raise and spend \$4 million dollars connected to a candidate in an ongoing political primary election—yet file and report literally nothing to the commission.

Standing for Texas's failure to comply with any of its obligations under the Federal Election Campaign Act means that the voters of Texas are deprived of information about the people and organizations that are funding Standing for Texas, as well as the firms and individuals that are financially benefiting from its activities. Texans are entitled to this information under the Federal Election Campaign Act, and the Commission should act swiftly to ensure that they get it.

CONCLUSION

Aside from this individual case, and as the commission certainly knows, imaginary-firewalls and using public avenues to coordinate has become an increasingly regular and bipartisan problem. Recent history has shown campaigns and outside groups pushing the boundaries further and further seemingly every election cycle until naturally arriving at this present case—where direct message exchanges between parties are unfolding in real-time. Frankly, the reason for this is as evident as the coordination itself and ties directly to the lack of enforcement and punishment in any meaningful sense. The importance of these coordination laws are self-evident and they are foundational for the entire campaign finance legal framework, and thus the enforcement of them is as critical as their existence.

This being said, we ask the commission find the following and compel the Respondents to immediately comply with the law:

1. The Commission should find reason to believe that Respondent funded and disseminated five television advertisements that were intended to influence the 2026 U.S. Senate primary election in Texas without ever registering as a political committee or filing the required disclosure reports in violation of 11 CFR §§ 102.1(d) and 104.1(a); AND
2. The Commission should find reason to believe that Respondents coordinated to produce advertisements, thus making and receiving impermissible corporate in-kind contributions and failing to report those contributions in violation of 11 CFR §§ 104.3(a)(4); or Respondent's advertisements were unreported independent expenditures in violation of 11 CFR § 104.4(b)(2); OR
3. In the alternative, the Commission should find reason to believe that Respondent has made more than \$10,000 in independent expenditures during a calendar year and filed to report these expenditures in violation of 11 CFR § 104.20(b).

Further, the Commission should determine and impose appropriate sanctions for any and all violations, should enjoin Respondent from any and all violations in the future, and should impose such additional remedies as are necessary and appropriate to ensure compliance with the Federal Election Campaign Act.

Dated: March ____, 2026

Respectfully submitted,

Kendra Arnold
Executive Director
Foundation for Accountability & Civic Trust
1717 K Street NW, Suite 900
Washington, D.C. 20006

Subscribed and sworn to before me on March ____, 2026.

Notary Public

How Wesley Hunt of Texas Is Working in Plain Sight With Outside Groups

Exchanges between two X accounts appear to offer a vivid example of how campaigns may sidestep campaign-finance law to share strategic information.

Feb. 28, 2026



Representative Wesley Hunt, center, at a watch party for the State of the Union address Tuesday night in Georgetown, Texas. Tamir Kalifa for The New York Times



By [Shane Goldmacher](#)

Shane Goldmacher is a national political correspondent who has covered campaign finance issues for more than a decade. He reported from Houston.

“Running out of money;” read the post on the social media platform X, “less

than \$400 remains in my pocket." It landed on Nov. 13, from an obscure account called @pie0myWesley with just three followers. Anyone else stumbling upon it might have assumed it was a random musing from someone who had seen better days.

The account instead appears to be connected to the Republican Senate campaign of Representative Wesley Hunt of Texas. And one of its followers is @TxGopFighter, with seeming connections to an outside group helping Mr. Hunt's candidacy. The two anonymous accounts have spent months sharing strategic information, private polling, messaging advice and media-buying data in what may be an effort to skirt federal law.

That law prohibits candidates from coordinating in private with independent groups such as super PACs. The Hunt campaign and those allies, however, are doing so with a pair of social media accounts in plain sight for those who know where to look.

Mr. Hunt is one of three major candidates in the Republican primary for Senate that Texas will hold on Tuesday. Senator John Cornyn, who has served for more than two decades, is running for re-election and facing a serious threat from Ken Paxton, the state attorney general.

Candidates and super PACs have increasingly become bold in pushing the boundaries on coordination limits. The laws result from a tangle of court rulings, regulations and the idea that groups with no limits on what they may raise could be a corrupting force on politics. The agency responsible for being a watchdog, the Federal Election Commission, has generally done little to crack down on these efforts. The commission, which does not comment on potential cases, did not immediately respond to a request for comment.

The messages from the X accounts that appear to be linked to Mr. Hunt's campaign and outside allies show the flimsiness of federal limits on coordination — and offer a rare window into the inner workings of a campaign.

The New York Times learned about the accounts from a strategist working for a rival, who was granted anonymity in order to share details of public communications that the strategist had been tracking for months.

The Hunt campaign did not respond to requests for comment. Reached by phone, a Republican political strategist linked to the @TxGopFighter account said in a brief interview that he is an adviser to Standing for Texas, an outside group that has spent millions on pro-Hunt ads.

"Everything has been in public," said the strategist, Stephen Puetz. The @TxGopFighter account has posted documents that are stored in Mr.

Puetz's Dropbox account.

"I'm an adviser and there's stuff that has been posted in public domain and I don't have anything to add to it," he said. "I'm not going to elaborate."

The two accounts were both created in October 2025, the month when Mr. Hunt entered the Senate contest. The messages and requests have been quite explicit.

Last fall, the @pie0myWesley account, which appears to have links to the

Hunt campaign, seemed to ask for new polling before a trip to Mar-a-Lago in Palm Beach, Fla., for a potential meeting with President Trump. The absence of Mr. Trump's endorsement has loomed large over the Texas race.

"Will be down in mar a lago on Friday. Would be great to have fresh data!" @pie0myWesley wrote on Nov. 17. The account said directly what it was looking for in a second post: "Given Wesley's rising momentum in the primary, I wonder how he and his opponents are doing in the general election? I hear that's what the president cares about the most."

The next day, @TxGopFighter wrote, "People who know the WH best are suggesting that the WH is already expecting fresh data on Monday am and that timeline is already set up."

Then, less than a week later, on Nov. 23, the @TxGopFighter account indeed posted "fresh data" — an internal poll that showed Mr. Hunt had passed Mr. Cornyn in a three-way race. "Happy Sunday to all but maybe less so for JC," the account wrote, apparently using Mr. Cornyn's initials.

"It is outrageous they feel the license to coordinate out in the open that explicitly," said Saurav Ghosh, the director of federal finance reform at the watchdog group Campaign Legal Center. The back-and-forth could provide a "test case" for the election commission, Mr. Ghosh said.

"Why doesn't the F.E.C. do something about this?" he added. "This has been the question folks like me have been asking for the last decade."

Nothing in the accounts says who is operating them. But @pie0myWesley has posted private polls from Harper Polling, which federal records show has done work for the Hunt campaign, as well as files to a Dropbox account operated by James Kyrkanides, who is on the campaign's payroll and served as Mr. Hunt's congressional chief of staff.

The @TxGopFighter account has posted a [private donor memo](#) from

Standing for Texas, a group that has spent more than \$6 million in pro-Hunt ads. as well as numerous [private pollina](#). [messagina memos](#) and [ad-buvina](#)

[information](#).

The documents have provided an unvarnished look at the campaign's internal operations.

On Thursday, @pie0myWesley posted a link to a poll conducted in recent days showing that Mr. Hunt's level of support had collapsed to the midteens — far behind both Mr. Cornyn and Mr. Paxton.

The survey, which has not otherwise been released publicly, was hosted in a Google drive that listed Mr. Kyrkanides's email address as the owner, and that said it was "Owned by Hunt for Congress."

Sidestepping federal limits on outside coordination is not new. The F.E.C. is designed to be divided equally between Democrats and Republicans and often deadlocks on enforcement matters. Currently, the commission does not even have enough commissioners to form a quorum to take any meaningful investigative or punitive actions. Mr. Trump [recently named](#) two new commissioners who have yet to be confirmed.

Dozens of candidates use so-called [red boxes](#) on their websites to make suggestions for how super PACs should spend money to support them. They include both top Democratic candidates in the Texas Senate race: [James Talarico](#), a state legislator, and Representative [Jasmine Crockett](#).

"Spanish speaking voters need to hear radio ads in the RGV, San Antonio and El Paso that there is no Democrat who Donald Trump fears more than Jasmine Crockett," read the instructions on Ms. Crockett's website.

The 2022 Senate campaign of JD Vance in Ohio pushed past a previous boundary, when an allied super PAC with more cash than the campaign committee posted reams of private data to [a Medium account](#). In 2023, a

super PAC supporting Gov. Ron DeSantis of Florida in his presidential bid [posted research, polling and messaging advice](#).

Usually, such communication goes in one direction. The Hunt accounts are distinctive in that they appear to include communications by people on both sides of the supposed firewall. At least two times, the accounts [replied to each other on X](#).

When @pie0myWesley posted a screenshot of an "interesting" pro-Hunt text message that it received on Nov. 21, the @TxGopFighter account replied with a screenshot of a different text attacking Mr. Cornyn, writing, "Word on the street is this also landed today."

In January, @TxGopFighter posted extensively about the different markets

where the campaign could get better rates for television ads than those of outside groups, including charts with more than a dozen media markets in the state that showed the difference in prices from 2025 for Fox News ads.

Memos linked to by @TxGopFighter offered advice — “lean into youth and strength,” read one bullet point in December. The @pie0myWesley account appeared to make suggestions about where to spend.

In mid-February, @pie0myWesley posted a screenshot of a handwritten note with information on how much money and where to invest in TV advertising — “\$500k for 800 points” in “Houston.” There was also a suggestion on the three specific talking points to hit Mr. Cornyn with, including the fact that former President Joseph R. Biden Jr. once praised him.

Earlier messages were more coded. “Wow, half of Johnny’s support comes from the cowboys,” read one post in December, linking to a poll. It was an apparent reference to the Dallas media market where the Cowboys football team plays.

The nonprofit group Standing for Texas is not required to disclose its donors.

It spent millions of dollars on pro-Hunt ads before he entered the race, according to AdImpact, an ad tracking service. On some media-buying documents in early 2025, the nonprofit listed a longtime Texas Republican operative, David Polyansky, as a contact. Mr. Polyansky, who said he had become an adviser to the Hunt campaign, declined to comment.

Mr. Hunt has not been shy about his alliance with Standing for Texas. In a radio interview the day after he entered the race, he said: “We started this project a while back ago,” because Mr. Cornyn was vulnerable.

“We don’t have ubiquitous name ID,” Mr. Hunt said on [“The Michael Berry Show”](#) on Oct. 7. “I have not been on a statewide ballot. So we started raising money and started running ads throughout the entire state of Texas to get our name ID up.” He later added, “We have spent \$6 million.”

The same day as the interview, @pie0myWesley posed a question on X, presumably about Standing for Texas: “Is there a bitcoin link on SFT website?”

It is unclear when it was added. But [there is one now](#).

A version of this article appears in print on March 3, 2026, Section A, Page 17 of the New York edition with the headline: In Texas Senate Races, Candidate Coordinates With PACs Flagrantly. [Order Reprints](#) | [Today's Paper](#) | [Subscribe](#)