



FACT

FOUNDATION FOR
ACCOUNTABILITY
AND CIVIC TRUST

March 1, 2023

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

Email: EnfComplaint@fec.gov

COMPLAINT BEFORE THE FEDERAL ELECTION COMMISSION

RE: George Santos

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. We achieve this mission by hanging a lantern over public officials who put their own interests over the interests of the public good. This complaint is submitted upon information and belief that George Santos and his campaign committee did not disclose expenditures as required by federal law.¹ According to his FEC filings, (1) Santos' 2022 campaign did not report \$365,389.08 in disbursements; and (2) reported \$254,108.88 of disbursements to recipients identified only as "Anonymous"—the majority of which were in the amount of \$199.99, just under the threshold to

¹ This complaint is submitted pursuant to 52 U.S.C. § 30109(a)(1) and is against George Anthony Devolder-Santos and his campaign committee, Devolder-Santos for Congress.

itemize.² We request the Federal Election Commission (FEC) investigate and take appropriate enforcement actions.³

Law. Federal law prohibits federal candidates from soliciting, receiving, directing, transferring, or spending funds in connection with an election for federal office unless the funds are subject to the limitations, prohibitions, and reporting requirements of the Act.⁴

A candidate and their committee must report all money raised (receipts) and spent (disbursements).⁵ One category of disbursements is “operating expenditures,” of which three categories must be reported: itemized operating expenditures, unitemized operating expenditures, and total operating expenditures.⁶ An operating expenditure must be itemized if it exceeds \$200 or aggregates over \$200 when added to other disbursements made to the same payee during an election cycle.⁷ To itemize a disbursement, the following must be disclosed: full name of payee, address of payee, the purpose of disbursement (a brief statement or description of why the disbursement was made), date of disbursement, and the amount of disbursement.⁸

\$356,389.08 in Unexplained Spending. Santos’ 2022 congressional campaign had unexplained spending in the amount of \$356,389.08—there is no record of where it went or for what purpose the expenditures were made.⁹ His campaign reported total operating expenses of \$3,060,549.17, but only reported itemized disbursements of \$2,695,160.09, for a difference of \$365,389.08 in unreported disbursements. This unreported spending accounts for nearly twelve

² 52 U.S.C. § 30104 (reporting requirements).

³ “If the Commission, upon receiving a complaint . . . has reason to believe that a person has committed, or is about to commit, a violation of [Act] . . . [t]he Commission shall make an investigation of such alleged violation.” 52 U.S.C. § 30109(a)(2); 11 C.F.R. § 111.4(a).

⁴ 52 U.S.C. §§ 30101, 30116, 30118.

⁵ 52 U.S.C. § 30104(b), 30114; 11 C.F.R. § 104.3.

⁶ 11 C.F.R. § 104.3.

⁷ *Id.*

⁸ *Id.*

⁹ Grace Ashford, Alexandra Berzon, Ken Bensinger, And Alyce McFadden, *George Santos And The Case Of The Missing \$365,000*, [The New York Times](#), Feb. 13, 2023 (attached as Exhibit A).

percent of his campaign’s spending—“many times exceeding what is typical for congressional candidates.”¹⁰ As outlined in the table below, Santos’ campaign consistently did not report expenditures across all of his FEC filings:¹¹

Santos’ Congressional Campaign Had Over \$365,000 Of Unreported Disbursements

Report	Operating Expenses	Itemized Disbursements	Difference
April Quarterly 2021	\$168,592.35	\$122,700.31	\$45,892.04
July Quarterly 2021	\$117,092.80	\$81,484.14	\$35,608.66
October Quarterly 2021	\$175,476.98	\$139,909.99	\$35,566.99
Year-End 2021	\$219,673.59	\$186,361.13	\$33,312.46
April Quarterly 2022	\$242,429.58	\$122,123.43	\$120,306.15
July Quarterly 2022	\$220,685.61	\$216,655.32	\$4,030.29
Pre-Primary 2022	\$153,613.50	\$151,978.57	\$1,634.93
October Quarterly 2022	\$726,478.03	\$641,463.73	\$85,014.30
Pre-General 2022	\$335,358.60	\$334,285.56	\$1,073.04
Post-General 2022	\$658,200.67	\$656,174.85	\$2,025.82
Year-End 2022	\$42,947.46	\$42,023.06	\$924.40
Total:	\$3,060,549.17	\$2,695,160.09	\$365,389.08

¹⁰ *Id.* For example, other New York congressional members only failed to account for zero to two percent of their expenses. *Id.*

¹¹ *Id.*; Devolder-Santos For Congress, *April Quarterly 2021 Amendment 4*, [Federal Election Commission](#), Filed Jan. 24, 2023; Devolder-Santos For Congress, *July Quarterly 2021 Amendment 7*, [Federal Election Commission](#), Filed Jan. 24, 2023; Devolder-Santos For Congress, *October Quarterly 2021 Amendment 7*, [Federal Election Commission](#), Filed Jan. 24, 2023; Devolder-Santos For Congress, *Year-End 2021 Amendment 4*, [Federal Election Commission](#), Filed Jan. 24, 2023; Devolder-Santos For Congress, *April Quarterly 2022 Amendment 4*, [Federal Election Commission](#), Filed Jan. 24, 2023; Devolder-Santos For Congress, *July Quarterly 2022 Amendment 3*, [Federal Election Commission](#), Filed Jan. 24, 2023; Devolder-Santos For Congress, *Pre-Primary 2022 Amendment 3*, [Federal Election Commission](#), Filed Jan. 24, 2023; Devolder-Santos For Congress, *October Quarterly 2022 Amendment 2*, [Federal Election Commission](#), Filed Jan. 24, 2023; Devolder-Santos For Congress, *Pre-General 2022 Amendment 1*, [Federal Election Commission](#), Filed Jan. 24, 2023; Devolder-Santos For Congress, *Post-General 2022 Amendment 1*, [Federal Election Commission](#), Filed Jan. 24, 2023; Devolder-Santos For Congress, *Year-End 2022 Original*, [Federal Election Commission](#), Filed Jan. 24, 2023.

The amount of the unexplained spending alone demonstrates it should have been reported. The failure to itemize disbursements in excess of \$365,000 clearly violates the reporting requirements.

(2) **\$254,108.88 in Disbursements to “Anonymous” & Disbursements in the Amount of \$199.99.** In FEC filings made in 2022 (original filings and amendments), Santos’ campaign reported disbursements to “Anonymous” in the amount of \$254,108.88.¹² These disbursements were reported in the following filings:¹³

Report	Disbursements To Anonymous	Number Of Disbursements	Number of \$199.99 Disbursements
April Quarterly 2021	\$43,237.41	217	196
July Quarterly 2021	\$32,974.93	169	107
October Quarterly 2021	\$31,796.65	169	121
Year-End 2021	\$28,279.66	142	139
April Quarterly 2022	\$117,820.23	590	588
Total:	\$254,108.88	1,287	1,151

¹² Emma Brown and Issac Stanley-Becker, *Santos Campaign Briefly Reported \$254,000 In Payments To “Anonymous”*, [The Washington Post](#), Jan. 27, 2023 (attached as Exhibit B).

¹³ Devolder-Santos For Congress, *April Quarterly 2021 Amendment 2*, Federal Election Commission, filed April 15, 2022; available at: <https://docquery.fec.gov/pdf/537/202204159496607537/202204159496607537.pdf>; Devolder-Santos For Congress, *July Quarterly 2021 Amendment 3*, Federal Election Commission, filed April 15, 2022; available at <https://docquery.fec.gov/pdf/820/202204159496609820/202204159496609820.pdf>; Devolder-Santos For Congress, *October Quarterly 2021 Amendment 3*, Federal Election Commission, filed April 15, 2022; available at: <https://docquery.fec.gov/pdf/417/202204159496706417/202204159496706417.pdf>; Devolder-Santos For Congress, *Year-End 2021 Amendment 1*, Federal Election Commission, filed April 15, 2022; available at: <https://docquery.fec.gov/pdf/078/202204159496754078/202204159496754078.pdf>; Devolder-Santos For Congress, *April Quarterly 2022 Original*, Federal Election Commission, filed April 15, 2022; available at: <https://docquery.fec.gov/pdf/846/202204159499746846/202204159499746846.pdf>.

Santos' campaign later amended those filings and simply removed the disbursements made to "Anonymous" from the reports.¹⁴

However, it is the amount of the anonymous disbursements that is more problematic—the majority of the anonymous disbursements were \$199.99, all but nine of the remaining were for a dollar amount that was a round number. For example, in Santos' April Quarterly 2022 report, the anonymous disbursements totaled "\$117,800, accounting for nearly half the campaign's total spending during that period. The money was doled out in 590 separate payments, all but two of which were for \$199.99 — just one penny beneath the threshold at which campaigns" must itemize disbursements.¹⁵ This pattern was similar for his other reports as well. Both the amount of the \$199.99 disbursements and the round number of the remaining disbursements indicate either the disbursements may not have been in that amount, or that they were structured in that amount to avoid reporting the true details of the payments.

Based on the facts above, it appears Rep. Santos and his campaign committee did not report disbursements in violation of federal law. Therefore, we request the FEC investigate the unknown spending and whether payments were structured to avoid itemizing the disbursements. Ultimately, if one or more campaign laws are found to have been broken we request the FEC hold the respondents accountable.

¹⁴ Emma Brown And Issac Stanley-Becker, *Santos Campaign Briefly Reported \$254,000 In Payments To "Anonymous"*, [The Washington Post](#), Jan. 27, 2023.

¹⁵ *Id.*

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 _____, 2023.

Notary Public

George Santos And The Case Of The Missing \$365,000

[The New York Times](#) | [Alexandra Berzon](#) , [Ken Bensinger](#) , [Alyce McFadden](#) , [Grace Ashford](#) | February 13, 2023
[View Source](#)

Representative George Santos has spent his campaign money in plenty of conspicuous ways, from lavish hotel stays in Las Vegas and Palm Beach, Fla., to an unusual slew of payments for exactly \$199.99 — two cents below the threshold where receipts would be required.

But deep within Mr. Santos's campaign filings, The New York Times found another eye-catching number: \$365,399.08 in unexplained spending, with no record of where it went or for what purpose.

The mysterious expenditures, which list no recipient and offer no receipts, account for nearly 12 percent of the Santos campaign's total reported expenses — many times exceeding what is typical for congressional candidates. Fellow New York House members, for example, failed to itemize between zero and 2 percent of their expenses this past cycle.

Without explanations for each expenditure in the reports filed with the Federal Election Commission, it's impossible to determine if Mr. Santos spent campaign funds on legitimate election-related purposes.

Election law experts said that the \$365,000 in unexplained expenses was not necessarily illegal but suggested a pattern of remarkable sloppiness, if not an attempt to cover up improper spending that violated campaign finance laws.

The unexplained spending is among a litany of irregularities found in nearly every aspect of how the Santos campaign handled its finances, The Times found.

Several donors said in interviews that the Santos campaign or associated groups misrepresented how much they gave. Campaign finance documents show discrepancies between what the Santos campaign reported having spent and what recipients, such as other Republican candidates, reported having been given.

When the campaign has amended its filings, as it has 36 times, some payments have gone up or simply disappeared. And though other New York candidates list \$26,000 in donations from Mr. Santos, the contributions do not appear in his filings at all, The Times's analysis showed.

Bill McGinley, a lawyer for one of the donors and a former general counsel to the National Republican Senatorial Committee, examined some of Mr. Santos's contribution reports and said they were "all over the place and do not make any sense."

"I've never seen anything like this," he added.

The shifting costs of a sushi meal

Mr. Santos, a Republican elected in November, is facing several [criminal and ethics inquiries](#) after revelations that [he lied](#) about his upbringing, education and work history. His fabrications have led to numerous calls for his resignation and suspicion over how he raised and spent his campaign money.

The unexplained \$365,000 in his campaign disclosures is a vivid example.

Mr. Santos launched his second bid for a New York House seat in early 2021, just months after he lost to Representative Thomas R. Suozzi.

From the beginning of his campaign, Mr. Santos spent extravagantly, traveling far outside his district to attend fund-raisers and other events, though he had no declared primary challenger. In the first three months of 2021, for example, he reported spending more than \$5,000 on airfare and hotel stays in West Palm Beach and Washington, D.C.

By late 2021, as Mr. Santos built his campaign war chest, his spending continued to pick up. He spent nearly \$90,000 in December, making trips to Kansas and Michigan, according to reports filed in January 2022.

Those two trips were memorialized in several itemized expenditures dated to Dec. 19. The filings show that Mr. Santos spent \$266.66 on five different Ubers and taxis, as well as \$828.78 on stays at the Hyatt Regency in Wichita, Kan. He also itemized \$140.54 he spent on food, including \$60.54 at Tokyo Sushi and Grill in Auburn, Hills, Mich.

But by April 2022, Mr. Santos seemed to have adopted a new accounting strategy. He added more than \$250,000 in more than 1,200 payments to “Anonymous,” nearly all for \$199.99. Some of the payments, [reported earlier by The Washington Post](#), were added to older spending reports; none had any description other than the dates.

Mr. Santos also used the April filings to change some of his previously recorded expenses, retroactively raising the cost of some of them to \$199.99. The cost of the five Uber and taxi rides from Dec. 19 rose to \$445.22, and the Tokyo Sushi and Grill bill had gone up to \$199.99. There were also three new expenses on that date, each for \$199.99, paid out to “Anonymous.”

In May, Mr. Santos changed his reports again. He wiped out all the individual line items paid to Anonymous, as well as the meal at Tokyo Sushi, but the filing still included the \$250,000 in spending, with no further details, dates or explanation.

In the latter stages of the campaign, Mr. Santos itemized small sums spent for gas, lunch and office supplies. But he also continued to spend money without providing receipts or identifying the date or recipient, with the unitemized spending growing to \$365,399.08.

Campaigns do not need to itemize or provide receipts for expenses of less than \$200. But if they spend more than \$200 with a single vendor — even spread over several transactions — they would be required to go back and itemize each expenditure.

If Mr. Santos were to suggest that the unexplained \$365,000 was spent in increments of \$200 or less, he would have had to do business with more than 1,800 separate entities — many times more than the roughly 270 he listed in itemized reports.

Experts said that would be implausible and called the spending concerning, particularly in concert with his other campaign finance issues.

Saurav Ghosh, a director with the Campaign Legal Center, a watchdog group, said that it “beggared belief” that each of the expenditures would have been made at different vendors and that none of them would have totaled more than \$200, adding: “It again falls into the category of reporting that is so ludicrous that it’s completely wrong, and suggests that they’re covering up how they actually spent their money.”

Mr. Santos’s director of communications declined to comment. Joe Murray, his lawyer, said that it would be inappropriate to comment given ongoing investigations into Mr. Santos.

The degree to which Mr. Santos has seemingly stretched campaign finance rules underscores the challenge that the F.E.C. faces in its effort to monitor hundreds of federal campaigns and an exploding number of political committees across the country each election cycle.

While the agency flagged scores of issues in Mr. Santos’s campaign filings, such as excessive contributions and unexplained increases in the number of itemized disbursements, it does not appear to have looked into the \$365,399.08 that Mr. Santos said he spent without any explanation. And even if it did, the spending would be difficult to parse.

“I don’t know how you even determine that it’s a lot of different expenditures,” said Kenneth Gross, the former head of the F.E.C. general counsel’s enforcement division. “You’re just stabbing around in the dark.”

The unreported \$95,000

The Santos campaign’s accounting of the political donations it received is also littered with discrepancies. Some donors say the amounts reported by the campaign do not match what they gave.

Several donors interviewed by The Times received letters from the F.E.C. asking them to explain donations that appear to be above the legal threshold.

But the issues went beyond that. In one case, the campaign reported 24 separate transactions from one donor that totaled nearly \$20,000, in excess of what is legally allowed. All are linked to the donor’s former address, but they use different versions of the donor’s name — making it appear as if the money is coming from two different people. Some of the contributions incorrectly refer to the donor’s having a spouse. The donor, who asked not to be identified, said his own records indicated that he gave around \$13,000 to the campaign and an associated committee in six transactions through that period.

Another generous Santos donor, Andrew Intrater, said that his personal financial records show that he donated around \$250,000 to the campaign and various Santos-connected political groups during the 2022 cycle. But not all the donations in the filings matched Mr. Intrater's records, he said.

Mr. Intrater gave \$175,000 to Rise NY PAC — a voter registration effort he later learned was run by Mr. Santos's sister and Nancy Marks, his campaign treasurer — only to later discover that \$95,000 of that was not reported by the group in the financial reports required by the state. (The PAC recently updated its filings to reflect the missing donations, which go back to 2021.)

Mr. Intrater also made another \$25,000 donation to a Santos-affiliated political entity called RedStone Strategies. Mr. Intrater made the donation after a RedStone representative, at Mr. Santos's prodding, told him and other donors that RedStone was raising \$1.5 million for a hefty television ad buy on behalf of Mr. Santos.

But it turned out that these donations — in fact the entire entity — were never registered and disclosed with the F.E.C. as would be required for such activity. [The Times has reported](#) that there is no sign that this group, which used the same co-working space address as Mr. Santos's campaign and business headquarters, actually spent any money on advertising or other political activity.

Mr. Intrater says he has provided information about the donations to the Department of Justice.

Scrutiny over donations

Another mystery revolves around fees that Mr. Santos paid to WinRed, the donation-processing digital platform used to collect mostly small-dollar contributions to candidates.

WinRed charges a standard fee (as of last year, 3.94 percent) on every donation, which is paid by the campaign or committee that receives the money. But Mr. Santos seemed to suggest a different arrangement that was reported earlier by [NBC News](#).

Mr. Santos, who received \$796,238.26 from WinRed, according to that company's F.E.C. filings, should have paid roughly \$33,000 in fees. Instead, his filings to regulators show payments adding up to more than \$206,000 — an appropriate fee only if Mr. Santos had taken in roughly \$5 million.

The overpayment leaves roughly \$173,000 in fees unaccounted for.

In a statement, WinRed said it “proactively reached out to the campaign to ensure its agency fees were being reported accurately.”

Paul S. Ryan, an expert in campaign finance law, suggested that Mr. Santos may be “inflating the payments to WinRed and pocketing them for personal use,” something that he said the F.E.C. might not notice because WinRed expenses are so common among candidates.

“The best way to avoid scrutiny is to file reports that appear plausible on their face,” he added.

The accounting problems extend to Mr. Santos's reported generosity to other candidates, records show. During the campaign, his primary campaign committee and leadership PAC gave more than \$180,000 to other campaigns and committees. But the amounts and names listed on his filings did not always match what his recipients recorded, [The Times's](#) analysis found.

Mr. Santos's leadership fund, GADS PAC, reported sending two donations of \$2,900 each in July of last year to Michelle Bond, a Long Island Republican who lost a primary challenge to Representative Nick LaLota. But Ms. Bond's records show a single donation of \$5,000 from the PAC in August, \$800 less than what Mr. Santos had reported.

Mr. Santos also sent two separate \$2,900 contributions from his leadership PAC to Blake Masters's unsuccessful Senate bid in Arizona, according to filings from Mr. Santos and Mr. Masters.

Mr. Santos's campaign reported making another donation, of \$2,000, to Mr. Masters, but that amount does not show up in Mr. Masters's filings. That contribution lists an address in the Florida Panhandle that does not appear to exist.

Mr. Masters's campaign confirmed it had no records of such a payment.

The inconsistent bookkeeping extended to other contributions made by Mr. Santos.

New York State campaign finance records show that state and local candidates and committees reported nearly two dozen donations from Mr. Santos and his PACs between 2020 and 2022, totaling more than \$26,000. But Mr. Santos's own filings with the F.E.C. show no record of the donations.

Santos Campaign Briefly Reported \$254,000 In Payments To ‘Anonymous’

[The Washington Post](#) | [Isaac Stanley-Becker](#), [Emma Brown](#) | January 27, 2023
[View Source](#)

In the spring of 2022, George Santos’s congressional campaign submitted a handful of filings to the Federal Election Commission that did something unheard of in campaign finance: The campaign reported spending a total of \$254,000 — in more than 1,200 small payments — to recipients identified only as “anonymous.”

A month later, in amended reports, those listed expenditures were gone. Campaigns generally are not required to itemize payments under \$200, so the removal of the “anonymous” payments reverted, in a way, to customary practice.

But their brief inclusion stunned experts, several of whom told The Washington Post that they had not seen filings for expenditures to recipients listed as “anonymous.” A review of other federal candidates’ 2022 filings by The Post found only a dozen such instances, most of which appeared to involve money returned to donors who had attempted to give anonymously. (Federal rules require campaigns to disclose the identities of their donors.)

“The entire purpose of the reporting requirements is to provide voters and the public with information about how campaigns are spending their money,” said Erin Chlopak, senior director for campaign finance at the nonpartisan Campaign Legal Center. “By definition, reporting ‘anonymous’ defeats the entire purpose.”

The Post found that the expenditures by Santos’s campaign, which have not been previously reported, were in amounts just under \$200, the threshold that would trigger a requirement for the campaign to keep receipts or other documentation.

The payments raise new questions for Santos, the 34-year-old freshman Republican from New York who has faced calls to resign after he lied to voters about key details of his biography. His campaign is the subject of multiple complaints filed with the FEC by watchdog groups including the [Campaign Legal Center](#), with particular attention directed to more than \$700,000 that he claims to have loaned his 2022 campaign.

Santos did not respond to messages seeking comment, and his lawyer declined to comment.

Santos’s campaign on Tuesday issued a slew of amendments to previous FEC filings, seeking to address concerns raised by the FEC’s analysis division on issues ranging from allegedly missing donor information to the possibility that the campaign had accepted contributions beyond the allowable limit.

On Wednesday, the campaign and affiliated political committees submitted forms indicating they had replaced Santos’s treasurer, Nancy Marks, a longtime accountant for GOP candidates on Long Island and beyond, with Wisconsin-based Thomas Datwyler. Datwyler’s name was written electronically on a line meant for the treasurer’s signature.

Datwyler’s lawyer, Derek Ross, told The Post that his client did not sign or authorize the paperwork and does not intend to serve as treasurer for the campaign or its affiliates. Ross said there must have been a miscommunication, as Datwyler told the campaign in an email on Monday that he would not become its treasurer.

Marks did not respond to requests for comment.

The payments to anonymous recipients did not emerge in this week’s filings, but rather were detailed in five reports the campaign submitted to the FEC last April.

At the end of 2021, the Santos campaign [reported](#) that it had spent about \$551,000 on its operations. But a few months later, on April 15, the campaign made significant revisions.

Marks submitted four amended filings to the FEC that revised the 2021 operations spending upward — to more than \$711,000. The increased spending was largely attributable to 697 payments to “anonymous,” totaling more than \$136,200, filings show. Not only were the recipients anonymous, but the purpose of the disbursements — which

campaigns are required to describe when they itemize payments — was also listed in each case as “anonymous.”

On the same day, Marks also submitted a [report](#) covering the first three months of 2022. It showed that the Santos campaign had paid “anonymous” recipients a total of \$117,800, accounting for nearly half the campaign’s total spending during that period. The money was doled out in 590 separate payments, all but two of which were for \$199.99 — just one penny beneath the threshold at which campaigns must keep receipts.

Campaigns are required to report individual payments below \$200 only if they are among multiple payments to a single entity that add up to more than \$200 within the two-year election cycle. When campaigns do report on payments, they are required to disclose the name and address of the recipient, as well as the date, purpose and amount of the expenditure.

“It certainly deepens questions about the repeated payments just under \$200, and about where that money was really going,” said Brendan Fischer, a lawyer with expertise in campaign finance and the deputy executive director of the watchdog group Documented.

Even when campaigns do not itemize small payments, those expenditures are included in overall spending totals, said Brett Kappel, a campaign finance lawyer at D.C.-based Harmon, Curran, Spielberg & Eisenberg. In May, Marks submitted another round of amendments, this time removing some payments of under \$200 for restaurant, gas and parking bills and all references to payments to “anonymous” — but appearing to keep those sums as part of the campaign’s spending totals, which remained unchanged.

Kappel said even the temporary inclusion of payments to “anonymous” raises doubt in his mind about the accuracy of the entire reports.

“I have never seen that,” he said. “It’s very troubling.”

Chlopak, of the Campaign Legal Center, said she found it hard to believe that the Santos campaign made so many small payments to so many people. “The likelihood that this committee made this number of below-\$200 disbursements to completely unique recipients remains a serious question that is suspect,” she said.

The amended filings submitted Tuesday also intensified the spotlight on the money Santos has claimed to have loaned his campaign. In filings to the FEC in 2021 and 2022, Santos reported giving his campaign three loans totaling \$705,000.

In the new filings, the campaign gave inconsistent accounts of the source of two of those loans. Boxes to indicate that a \$500,000 loan came from Santos were checked in some places but not in one other place. A box to indicate that Santos was the source of a \$125,000 loan was left unchecked. The new filings do not indicate where the money originated, if not from Santos personally.

To inform the FEC that a loan did not originate from a candidate’s own money would ordinarily require documentation showing that the loan came from a bank, Kappel said.

Fischer, Documented’s deputy executive director, said it was hard to tell whether the paperwork reflected “intentional obfuscation or sloppiness.”

The FEC makes public its requests to campaigns for clarifying information or corrections to campaign finance reports. According to those requests, the regulator did not ask the Santos campaign to explain its payments to “anonymous.” The FEC did ask the campaign to explain why it initially reported low 2021 spending levels that later were revised upward.

In a written [response](#) submitted in August, campaign officials blamed the oversight on a “glitch” in a database they used for campaign finance reporting.

“In reviewing the documents we realized that there were expenses that were not carried into this report,” the campaign’s response stated. “Once we realized the glitch in the system, we made, with the assistance of the database company, the proper adjustments. Unfortunately, that is why the expenses became increased.”

An FEC spokeswoman declined to answer questions about the Santos campaign’s filings.