

BEFORE THE FEDERAL ELECTION COMMISSION

NRSC
425 2nd Street NE
Washington, DC 20002

v. MUR No. _____

Mary Peltola
810 N Street, Suite 301
Anchorage, AK 99501

Mary Peltola for Alaska (C00812388)
946 Bandmann Trail
Missoula, MT 59802

Eric Croft, in his official capacity as Treasurer
946 Bandmann Trail
Missoula, MT 59802

COMPLAINT

Complainant seeks an investigation into Mary Peltola for Alaska’s (the “Committee”) payment of hundreds of thousands of dollars for food and travel expenses after Mary Peltola’s failed re-election bid in November 2024. Despite filing purportedly to run again for Alaska’s at-large U.S. House seat in 2026, Peltola was not, in fact, campaigning during the timeframe at issue. Therefore, these expenses must have been for her personal use, in violation of 52 U.S.C. § 30114(b)(1).

In the alternative, if Peltola’s position is that she was a legitimate candidate for the U.S. House during this time, then the \$400,000 salary she earned contemporaneously as a purported lobbyist was an excessive contribution from her employer because it grossly exceeded the value of the work (or lack thereof) that she was performing, in violation of 52 U.S.C. § 30116(a) and 11 C.F.R. § 113.1(g)(7). Moreover, the Committee failed to report these payments as contributions, in violation of 52 U.S.C. § 30104(b)(3)(A).

FACTS

On November 8, 2024—immediately after losing her reelection for the U.S. House of Representatives for Alaska’s at-large seat—Mary Peltola quietly amended her FEC Form 2 (Statement of Candidacy) to purportedly run for the seat again in the 2026 election cycle.¹ The filing designated the Committee as her principal campaign committee.²

¹ FEC, Form 2 Statement of Candidacy—Mary Peltola (Nov. 8, 2024), <https://docquery.fec.gov/pdf/213/202411089719958213/202411089719958213.pdf>.

² *Id.*

From January 2025 through February 2026, the Committee racked up more than \$230,000 in expenses, “including \$50,000 on airline tickets and lodging, often outside of Alaska,” “\$8,000-plus on catering and meals and more than \$1,300 on ground transportation”³ until Peltola publicly announced she was running for U.S. Senate in January 2026 and formed a separate campaign committee for that candidacy.⁴ As reported by NOTUS, it is equally “notable what Peltola’s House committee wasn’t spending money on”—namely, “the committee reported having no staffers on its payroll[, n]or did the committee report any advertising or legal expenditures” during the final quarter of 2025.⁵ “It spent just \$2,667 on fundraising efforts during this time—about the same amount it reported paying for storage fees.”⁶ In short, the committee did not operate as if Peltola was a candidate preparing for a difficult campaign in a competitive House district.

Nor did Peltola give any public indication that she was running for the House again (or the Senate, for that matter):

- ⊗ In July 2025,
 - ⊗ prominent Alaska Democrats who were asked said they were uncertain about her political intentions;⁷
 - ⊗ Peltola herself declined to comment for a news report on her political intentions— a noticeable silence if she were actually running for the House seat, as her FEC Form 2 filed more than eight months earlier purported she was doing;⁸
 - ⊗ Peltola’s former campaign manager stated that Peltola “has not made up her mind about whether to run for governor, U.S. Senate or U.S. House”;⁹

³ Dave Levinthal, *Mary Peltola’s House Campaign Spent on Airfare, Hotels and Meals as She Eyed a Senate Run*, NOTUS (Mar. 26, 2026), <https://www.notus.org/2026-election/mary-peltola-house-campaign-spending-alaska-senate>; FEC, *Mary Peltola for Alaska—Disbursements*, https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00812388&min_date=11%2F08%2F2024&max_date=12%2F31%2F2025&disbursement_description=meals&disbursement_description=travel (depicting “meal” and “travel” expenses from November 8, 2024–December 31, 2025).

⁴ See FEC, *Alaskans for Mary*, <https://www.fec.gov/data/committee/C00933978/>.

⁵ Levinthal, *supra* note 3.

⁶ *Id.*

⁷ Nathaniel Herz, *National Democrats are “salivating” over a Mary Peltola bid for U.S. Senate. But Alaska’s governor’s race could be “wide open” too*, Northern Journal (Jul. 14, 2025), <https://www.northernjournal.com/national-democrats-are-salivating-over-a-mary-peltola-bid-for-u-s-senate-but-alaskas-governors-race-could-be-wide-open-too/> (see quotes attributed to “longtime Anchorage political consultant” Jim Lottsfeldt and Democratic former State Senator Tom Begich).

⁸ *Id.* (“Peltola . . . declined to comment”).

⁹ *Id.*

- ⊗ In August 2025, Peltola told supporters in a text message that she was “considering how I can best serve Alaskans” but “offered little indication about what exactly those public service aspirations might entail”;¹⁰
- ⊗ The same month, her ostensible House candidacy went unmentioned when she accepted an eight-week fellowship at the University of Chicago’s Institute of Politics;¹¹
- ⊗ Peltola’s biography on the Institute of Politics website listed her current position as “Senior Director of Alaska Affairs” for Holland & Hart, and did not mention that she was a current candidate for any political office;¹²
- ⊗ As late as September 2025, the former Alaska Democratic Senate Minority Leader stated that he was not sure of Peltola’s intentions, and Peltola’s spokesperson had “not returned multiple requests for comment” —again, a noticeable silence if she were actually running for the House again;¹³
- ⊗ In a September 2025 event at Boise State University, Peltola did not mention that she was a candidate for any office and instead spoke exclusively about lessons for women in leadership.¹⁴

Needless to say, it is bizarre for a political candidate to run for the U.S. House of Representatives and yet fail to mention that fact to anyone, including when repeatedly asked by reporters to simply confirm the fact of her candidacy.

Given that there is no indication that Peltola was in fact seeking office during this time, the more than \$100,000 in meal and travel expenses paid by the Committee in 2025 must have been for her personal use. A few specific expenses are particularly notable:

¹⁰ Levinthal, *supra* note 3.

¹¹ Suzanne Downing, *Mary Peltola named Pritzker Fellow in Chicago, fueling speculation on a platform for her 2026 political plans*, Must Read Alaska (Aug. 22, 2025), <https://mustreadalaska.com/mary-peltola-named-pritzker-fellow-in-chicago-fueling-speculation-on-a-platform-for-her-2026-political-plans/> (“national Democrats are watching closely to see if she will reenter Alaska politics in 2026. On Aug. 21, the Cook Political Report reiterated the news that Senate Minority Leader Chuck Schumer has been urging Peltola to challenge Republican Sen. Dan Sullivan, who is up for reelection in 2026. But polls suggest Peltola might fare better in Alaska’s open governor’s race”).

¹² Univ. of Chi. Inst. of Politics, *Pritzker Fellows—Mary Peltola*, <https://politics.uchicago.edu/fellows/former-fellows/mary-peltola>.

¹³ Wil Courtney, *Federal records: Peltola’s been running for U.S. House seat since November 2024*, 2KTUU (Sep. 12, 2025), <https://www.alaskasnewssource.com/2025/09/13/federal-records-peltola-been-running-us-house-seat-since-nov-2024/>.

¹⁴ YouTube, *Mary Peltola Keynote Address, 2025 Women and Leadership Conference* (Jan. 27, 2026), https://www.youtube.com/watch?v=eh_VRjjOx_E&list=PLugGhRP0ZeKqDkpJ07FkmuIv8It-QU8yd&index=2.

1. A \$648 charge at the Blackstone Autograph hotel in Chicago for “travel” on November 3, 2025,¹⁵ which coincided with Peltola’s time at the University of Chicago’s Institute of Politics as a Pritzker Fellow and seminar host;¹⁶
2. More than \$900 in charges at the Grove Hotel in Boise for “travel” on November 3, 2025, which was likely for Peltola’s appearance at Boise State University’s Women and Leadership Conference;¹⁷
3. Almost \$4,000 in DoorDash and Grubhub charges, many of which were \$9.99 monthly recurring charges that are likely for DashPass and Grubhub+ subscriptions;¹⁸
4. More than \$700 at The Monocle, a steak and seafood restaurant in Washington, DC, for “catering/meals”;¹⁹
5. More than \$1,400 at the National Democratic Club in Washington, DC for “catering/meals.”²⁰

While Peltola was apparently using the Committee as a personal slush fund under the artifice of her nominal status as a U.S. House candidate for the 2026 election cycle, she was also reportedly earning more than \$400,000 as a lobbyist at Holland & Hart, LLP.²¹ At the firm, “Peltola reportedly brought in no clients, generated no billable work, and produced no revenue.”²² She also never registered as a lobbyist, neither in Alaska nor at the federal level, which would have been mandatory if she were actually communicating with government officials on behalf of lobbying clients.²³

¹⁵ FEC, Form 3—Mary Peltola for Alaska (filed Jan. 31, 2026) at 23, <https://docquery.fec.gov/pdf/277/202601319808278277/202601319808278277.pdf>.

¹⁶ Downing, *supra* note 11 (“Peltola will be part of the fall cohort that begins in September. Pritzker [*sic*] Fellows participate in 8-week residencies during an academic quarter.”).

¹⁷ FEC, Form 3—Mary Peltola for Alaska (filed Jan. 31, 2026) at 23-24, <https://docquery.fec.gov/pdf/277/202601319808278277/202601319808278277.pdf>

¹⁸ FEC, Mary Peltola for Alaska—Disbursements, https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00812388&recipient_name=doorash&recipient_name=grubhub&min_date=11%2F05%2F2024&max_date=12%2F31%2F2025 (depicting “DoorDash” and “Grubhub” expenses from November 8, 2024-December 31, 2025).

¹⁹ FEC, Mary Peltola for Alaska—Disbursements, https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00812388&recipient_name=monocle&min_date=11%2F05%2F2024&max_date=12%2F31%2F2025 (depicting “Monocle” expenses from November 8, 2024-December 31, 2025).

²⁰ FEC, Mary Peltola for Alaska—Disbursements, https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00812388&recipient_name=national+democratic+club&two_year_transaction_period=2026 (depicting “National Democratic Club” expenses from November 8, 2024-December 31, 2025).

²¹ Suzanne Downing, *Mary Peltola’s revolving door just spun again at Holland & Hart*, Alaska Story (undated), <https://thealaskastory.com/mary-peltolas-revolving-door-just-spun-again-at-holland-hart/>.

²² *Id.*

²³ See State of Alaska, Lobbyists Directory, <https://aws.state.ak.us/apocreports/Lobbying/LobbyistDirectory.aspx> (depicting no results for lobbyists named “Mary Peltola” in report year 2025 or 2026); see also U.S. Senate LDA,

ARGUMENT

1. Peltola Spent Campaign Funds for Personal Use

The Federal Election Campaign Act of 1971, as amended (the “Act” or “FECA”) prohibits the “personal use” of campaign funds by any person.²⁴ “Personal use” is defined as any expense “that would exist irrespective of the candidate’s campaign or duties as a Federal officeholder.”²⁵

The meal and travel expenses at issue in this complaint *could* have been legitimate campaign expenses—if a legitimate campaign had existed during the period in question. However, as the evidence above demonstrates, Peltola was operating a sham campaign to dip into her donor-funded Committee account to pay for her personal expenses. If she had been running an actual campaign while she was racking up these charges, nobody knew about it: Not the media, not Alaska elected officials, and not even Peltola’s own confidantes and spokesperson.

Recognizing that these types of expenses are particularly fraught for abuse, the Commission’s regulations subject meal and travel expenses to a “case-by-case” determination.²⁶ Here, the facts warrant finding “reason to believe” that Peltola and the Committee violated the personal use prohibition.

Ordinarily, campaign committees pay for meal and travel expenses for the following legitimate reasons: (1) to hold campaign events with voters; (2) to hold fundraising events with donors (which can justify many out-of-district expenses); (3) to meet with party officials to seek their support (which can justify certain Washington, DC expenses); or (4) for officeholder-related expenses.²⁷ Here, none of these conceivable justifications hold water.

First, Peltola was no longer a federal officeholder in 2025, when most of these expenses were incurred. Therefore, these charges could not have related to legitimate officeholder expenses. And while she remained a lame-duck House member through the end of 2024, there is no plausible explanation that justifies the sheer number of DoorDash, Grubhub, and other meal and travel charges she racked up during that time as officially-related.²⁸

Registrations & Quarterly Activity,

https://lda.gov/filings/public/filing/search/?registrant=®istrant_country=®istrant_ppb_country=&client=&client_state=&client_country=&client_ppb_country=&house_id=&lobbyist=peltola&lobbyist_covered_position=&lobbyist_conviction_disclosure=&lobbyist_conviction_date_range_from=&lobbyist_conviction_date_range_to=&report_period=&report_year=&report_dt_posted_from=&report_dt_posted_to=&report_amount_reported_min=&report_amount_reported_max=&report_filing_uuid=&report_house_doc_id=&report_issue_area_description=&affiliated_organization=&affiliated_organization_country=&foreign_entity=&foreign_entity_country=&foreign_entity_ppb_country=&foreign_entity_ownership_percentage_min=&foreign_entity_ownership_percentage_max=&search=search (zero LDA reports filed listing “Mary Peltola” as the relevant lobbyist in any year).

²⁴ 52 U.S.C. § 30114(b)(1).

²⁵ 11 C.F.R. § 113.1(g).

²⁶ *Id.* § 113.1(g)(1)(ii)(B), (C).

²⁷ *Id.* § 113.2(a).

²⁸ *See supra*, notes 18 and 19.

Second, had Peltola actually engaged in any of these activities in furtherance of a legitimate campaign that would justify the expenses, surely media reports throughout 2025 would not have openly speculated about which office she was running for, or whether she was running for any office at all.

Third, the Chicago and Boise hotel charges coinciding with her tenure as a fellow at the University of Chicago and a speaker at Boise State University in the fall of 2025 cannot be justified under any campaign-related rationale. These were neither campaign events, fundraising events, nor meetings with party officials.

Finally, even if Peltola attempted to justify these expenses as part of a “testing-the-waters” effort,²⁹ that explanation also would fall flat. Her filing of an amended Statement of Candidacy on November 8, 2024, designating Peltola as a U.S. House candidate for the 2026 election cycle, made her a “candidate” for FECA purposes and thus removed her from the “testing-the-waters” paradigm.³⁰ As the Deputy Press Officer for the FEC noted when asked for comment on Peltola’s candidacy status, “they’ve kind of bypassed what the testing the waters is for” by filing a Statement of Candidacy to run for the House in 2026.³¹ It also beggars belief that a legitimate effort to assess whether Peltola should run for the House again would involve 218 travel expenses³² or 166 catering and meal expenses³³ over a 13-month period.

2. Peltola Received Excessive Contributions From Her “Compensation” As a “Lobbyist”

As demonstrated above, there is reason to believe that Peltola was a sham candidate for the U.S. House during the 13 months after she lost her reelection bid in 2024, and any claims that her meal and travel costs were legitimate campaign expenses ring hollow. Alternatively, even if Peltola could claim she was a legitimate candidate during the relevant timeframe, then she was given a sham \$400,000-a-year job as a “lobbyist,” and the payments she received from Holland & Hart were excessive contributions to her ongoing campaign.

Under the Commission’s regulations, an employer’s payments to an employee who is a candidate are considered campaign contributions unless each of the following conditions is met:

²⁹ See 11 C.F.R. §§ 100.72, 100.131.

³⁰ See AO 1979-51 (Edgar for Congress) (noting that a U.S. House member’s filing of a Statement of Candidacy for the U.S. Senate caused him to become a candidate for that office).

³¹ Wil Courtney, *supra* note 13.

³² FEC, Mary Peltola for Alaska—Disbursements, https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00812388&min_date=11%2F08%2F2024&max_date=12%2F31%2F2025&disbursement_description=travel (depicting “travel” expenses from November 8, 2024-December 31, 2025).

³³ FEC, Mary Peltola for Alaska—Disbursements, https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00812388&min_date=11%2F08%2F2024&max_date=12%2F31%2F2025&disbursement_description=meals (depicting “meal” expenses from November 8, 2024-December 31, 2025).

- (A) The compensation results from *bona fide employment* that is genuinely independent of the candidacy;
- (B) The compensation is exclusively in consideration of services provided by the employee as part of this employment; and
- (C) The compensation does not exceed the amount of compensation which would be paid to any other similarly qualified person for the same work over the same period of time.³⁴

As to the first condition, compensation may be considered “independent of the candidacy” if payments began before the individual became a candidate.³⁵

Where a candidate receiving compensation from his law firm “would not perform [any] services for the firm,” the Commission concluded that any compensation paid by the firm would constitute contributions to his campaign.³⁶ On the other hand, compensation paid to a lobbyist running for office would not result in campaign contributions where “the rate of compensation is the same as a similarly qualified person would receive,” and the employment was “bona fide,” “genuinely independent of [his] candidacy,” and “exclusively for his services.”³⁷

As noted above, “Peltola reportedly brought in no clients, generated no billable work, and produced no revenue” while she was supposedly a lobbyist at Holland & Hart LLP.³⁸ During her ten months as an ostensible lobbyist, Peltola never registered as a lobbyist either in Alaska or Washington, DC and did not file a single lobbying report.³⁹ If she had actually been lobbying government officials on behalf of clients at either the state or federal level, then such registration and reporting would have been mandatory. Therefore, her position could not have been “*bona fide employment*,” and the \$400,000 salary she received could not possibly have been comparable to what “would be paid to any other similarly qualified person for the same work over the same period of time.”⁴⁰

³⁴ 11 C.F.R. § 113.1(g)(7)(iii) (emphasis added); AO 2000-01 (Taveras).

³⁵ 11 C.F.R. § 113.1(g)(7)(iii) (“Examples of payments considered to be irrespective of the candidacy include . . . situations where [] [p]ayments for that expense were made by the person making the payment before the candidate became a candidate.”).

³⁶ AO 2000-01 (Taveras).

³⁷ AO 1979-74 (Emerson).

³⁸ Downing, *supra* note 21.

³⁹ See State of Alaska, Lobbyists Directory, <https://aws.state.ak.us/apocreports/Lobbying/LobbyistDirectory.aspx> (depicting no results for lobbyists named “Mary Peltola” in report year 2025 or 2026); U.S. Senate LDA, *Registrations & Quarterly Activity*, https://lda.gov/filings/public/filing/search/?registrant=®istrant_country=®istrant_ppb_country=&client=&client_state=&client_country=&client_ppb_country=&house_id=&lobbyist=peltola&lobbyist_covered_position=&lobbyist_conviction_disclosure=&lobbyist_conviction_date_range_from=&lobbyist_conviction_date_range_to=&report_t_period=&report_year=&report_dt_posted_from=&report_dt_posted_to=&report_amount_reported_min=&report_amount_reported_max=&report_filing_uuid=&report_house_doc_id=&report_issue_area_description=&affiliated_organization=&affiliated_organization_country=&foreign_entity=&foreign_entity_country=&foreign_entity_ppb_country=&foreign_entity_ownership_percentage_min=&foreign_entity_ownership_percentage_max=&search=search (zero LDA reports filed listing “Mary Peltola” as the relevant lobbyist).

⁴⁰ 11 C.F.R. § 113.1(g)(7)(iii); AOs 2000-01 (Taveras), 1979-74 (Emerson).

Moreover, the firm did not hire her until March 2025⁴¹—four months after she filed her amended Statement of Candidacy with the FEC in November 2024. This further indicates the compensation was not “independent of” her candidacy and therefore resulted in contributions to her campaign.⁴²

In short, Holland & Hart’s payments to Peltola far exceeded the \$3,500 per-election contribution limit for a partnership for the 2026 election cycle. The Committee also failed to report the firm’s payments to Peltola as contributions.⁴³

CONCLUSION

As recited above, Mary Peltola racked up hundreds of thousands of dollars in spending from her designated principal campaign committee for food and travel expenses as an ostensible House candidate for the 2026 election cycle. These expenses were not legitimate campaign expenses because she was not in fact running a House campaign while incurring these expenses, and no one even knew she was a candidate. Therefore, there is reason to believe these expenses were an impermissible personal use of campaign funds.

And even if Peltola were to maintain that she was a bona fide candidate for the U.S. House during this period, then the \$400,000 that she was paid for a lobbying job in which she never registered as a lobbyist or reported any lobbying activity resulted in grossly excessive contributions from her employer, which her campaign committee also failed to report.

On these facts, the Commission should find reason to believe that Mary Peltola and Mary Peltola for Alaska violated 52 U.S.C. §§ 30114(b)(1), 30116(a), and 30104(b)(3)(A); and 11 C.F.R. § 113.1(g)(7).

Respectfully submitted,

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⁴¹ Timothy Cama, *Alaska Democrat Peltola joins lobbying firm*, Politico Pro (Mar. 3, 2025), <https://subscriber.politicopro.com/article/eenews/2025/03/03/alaska-democrat-peltola-joins-law-and-lobbying-firm-00208948>.

⁴² 11 C.F.R. § 113.1(g)(7)(iii).

⁴³ FEC, Mary Peltola for Alaska—Contributions, https://www.fec.gov/data/receipts/?data_type=processed&committee_id=C00812388&contributor_name=holland&two_year_transaction_period=2026 (showing no contributions from Holland & Hart for the 2026 election cycle).

Signed and sworn before me this 26th day of March, 2026



Notary Public

My Commission Expires: 12/15/2029
Date

Commonwealth of Pennsylvania - Notary Seal Joseph Stewart Orłowsky, Notary Public Blair County My commission expires December 15, 2029 Commission Number 1465050
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Notarized remotely online using communication technology via Proof.