

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of:

Scott Wiener

Scott Wiener for Congress (FEC ID: C00909283)

Families for an Affordable San Francisco (FEC ID: C00923813)

COMPLAINT

I am filing this complaint pursuant to 52 U.S.C. § 30109(a)(1) against Scott Wiener, Scott Wiener for Congress, and Families for an Affordable San Francisco (collectively “Respondents”). Mr. Wiener is a candidate in the California 11th Congressional District. Scott Wiener for Congress is his principal campaign committee. Families for an Affordable San Francisco is an independent expenditure-only political committee, or a Super PAC.

Based on the evidence provided below, the Commission should immediately investigate the Respondents for making and receiving excessive contributions, as well as reporting violations.

I. INTRODUCTION

This complaint concerns an arrangement between the Respondents through which Families for an Affordable San Francisco appears to be subsidizing Mr. Wiener’s campaign operations, using funds raised outside of federal contribution limits.

As reported in an October 15, 2026 article by Mark Alfred, “*Pelosi's Potential Successor Is Pushing the Limits of Super PAC Coordination*” (Exhibit A), Scott Wiener for Congress and Families for an Affordable San Francisco share headquarters, personnel, consultants, vendors, and campaign infrastructure generally. Families for an Affordable San Francisco has paid for campaign-related events, staffing, polling, and other operating expenses, with Scott Wiener for Congress paying or reimbursing some portions of those expenses.

Unless otherwise stated, the factual allegations below are made upon information and belief, based on Exhibit A and on reports Respondents have filed with the Commission, which are publicly available and incorporated by reference.

Families for an Affordable San Francisco has justified its coordination with the Wiener Campaign by relying on FEC Advisory Opinion 2024-01 (*Texas Majority PAC*). **That opinion, however, did not provide blanket authorization for a super PAC to finance a candidate's general campaign operations.** It addressed specific coordinated canvassing activities, while expressly recognizing that providing canvassing data to a candidate for less than fair-market value constitutes an in-kind contribution.

Although the Wiener Campaign has reportedly reimbursed Families for an Affordable San Francisco for certain expenses, the central question is whether those payments reflect the actual value of goods and services received by the Wiener Campaign or whether Families for an

Affordable San Francisco has improperly subsidized the Wiener Campaign's operations under the guise of coordinated canvassing.

II. FACTUAL ALLEGATIONS

A. Shared Campaign Operations and Personnel

The Wiener Campaign and Families for an Affordable San Francisco reportedly share headquarters at 2055 Market Street in San Francisco, at least five concurrently paid staff members, and numerous consultants and vendors, including Todd David, Bedford Grove, KMM Strategies, and EMC Research.

Todd David, the treasurer of Families for an Affordable San Francisco and Mr. Wiener's political director during his 2016 state senate race, is simultaneously paid by the Wiener Campaign for "campaign consulting" and by Families for an Affordable San Francisco for "canvassing consulting." His son, Noah David, is listed as a member of the "campaign team" on the Families for an Affordable San Francisco website and receives paychecks from the Wiener Campaign while using an email address connected to Families for an Affordable San Francisco.

Families for an Affordable San Francisco also finances the "Team Wiener" website (<https://www.teamwiener.com/>), which identifies approximately 20 individuals as members of "our campaign team," features a video of Mr. Wiener, and incorporates the Wiener Campaign's Mobilize event feed. Families for an Affordable San Francisco funded communications promoting the Wiener Campaign's merchandise store. The merchandise store generates revenue for the Wiener Campaign. The Mobilize feed hosts more than 100 event invitations bearing the disclaimer "Paid for by Scott Wiener for Congress," some of which are led by staff on the payroll of Families for an Affordable San Francisco. Notably, the legal memorandum prepared for Families for an Affordable San Francisco by its counsel, Olson Remcho, acknowledges that the PAC "may not reproduce or redistribute the candidate's own materials," because "[s]uch activity would qualify as an in-kind contribution to the candidate, subject to the federal contribution limits and source restrictions."

Several Families for an Affordable San Francisco employees appear to perform broader campaign functions, beyond canvassing. Rebecca Kee received \$3,750 from Families for an Affordable San Francisco and \$5,250 from the Wiener Campaign during overlapping periods, while her listed responsibilities on the Team Wiener website included events, endorsements, and rapid response. Jose Luis Gandara, an employee of Families for an Affordable San Francisco, was identified as the Wiener Campaign's "Policy Lead & LGBTQ Outreach Manager."

These arrangements raise questions about whether Families for an Affordable San Francisco has paid for general campaign activities and services beyond the permissible canvassing activities addressed in AO 2024-01.

B. Shared Expenses and Questionable Allocations

Families for an Affordable San Francisco reportedly paid \$825 for DJ services at Mr. Wiener's May 15 birthday celebration and campaign headquarters opening, with the Wiener Campaign subsequently reimbursing Families for an Affordable San Francisco \$275. Families for an Affordable San Francisco also paid \$510 for event security, while the Wiener Campaign paid \$255. The expenses were characterized as canvassing-related despite the event being publicly promoted as a birthday celebration and headquarters opening.

Similarly, Families for an Affordable San Francisco spent \$1,338.52 at Costco for purported canvassing-related food and beverages, while the Wiener Campaign subsequently reimbursed \$446.17. Headquarters rent is reportedly allocated two-thirds to Families for an Affordable San Francisco and one-third to the Campaign.

These recurring expenses raise questions about whether the Wiener Campaign's payments reflect actual use and benefit or improper shift of campaign operations and expenses onto Families for an Affordable San Francisco. Every jointly incurred expense identified above (the DJ, security, Costco purchases, and headquarters rent) was split in the same two-to-one ratio, including expenses with no apparent connection to canvassing. A fixed formula applied uniformly to dissimilar expenses suggests that costs were not allocated according to each committee's actual use or benefit. The existence of reimbursements does not itself establish that the Wiener Campaign paid the full amount properly attributable to its activities. Similarly, simply labeling expenses as “canvassing” on campaign finance reports does not bring all of these activities within the scope of AO 2024-01.

C. Polling Expenses

On June 29, 2026, Families for an Affordable San Francisco reportedly paid EMC Research \$49,600 for “canvassing polling data.” The Campaign subsequently reported a \$24,800 debt representing half the polling expense, which reportedly remained unpaid as of the article's publication. This arrangement raises questions about whether Families for an Affordable San Francisco provided polling data or services to the Campaign below fair-market value or improperly financed campaign expenses.

III. VIOLATIONS

A. Excessive or Prohibited In-Kind Contributions

Federal Election Campaign Act (FECA) defines contributions to include anything of value provided for the purpose of influencing a federal election. *See* 52 U.S.C. § 30101(8)(A)(i). Goods or services provided below the usual and normal charge constitute in-kind contributions. *See* 11 C.F.R. § 100.52(d)(1). FECA prohibits excessive contributions and contributions from prohibited sources. *See* 52 U.S.C. §§ 30116(a), 30118(a). Candidates and their committees may not knowingly accept excessive contributions. *See* 52 U.S.C. § 30116(f).

To the extent Families for an Affordable San Francisco paid for general campaign operations without full reimbursement, those payments constitute excessive or prohibited in-kind contributions.

B. Coordination Beyond the Scope of Advisory Opinion 2024-01

Expenditures coordinated with a candidate generally constitute in-kind contributions. *See* 52 U.S.C. § 30116(a)(7)(B)(i); 11 C.F.R. § 109.20. In Advisory Opinion 2024-01, the Commission permitted certain coordination concerning paid canvassing activities, including associated production and distribution costs. **The opinion did not authorize unlimited coordination or financing of a candidate's campaign operations merely because those expenses are characterized as canvassing-related.** Nor did it exempt below-market transfers of polling or canvassing data from the contribution rules. The extensive sharing of personnel, headquarters, campaign infrastructure, and expenses warrants investigation into whether Families for an Affordable San Francisco has financed activities outside the opinion's limited scope.

C. Polling, Extensions of Credit, and Disclosure

Families for an Affordable San Francisco's payment for polling services may constitute an impermissible in-kind contribution or advance if the Wiener Campaign received polling data or services without providing lawful, full-value payment. *See* 52 U.S.C. § 30101(8)(A)(i); 11 C.F.R. § 100.52. The Commission's regulations specifically provide that a candidate's acceptance of poll results is an in-kind contribution of the allocable share of the poll's cost. *See* 11 C.F.R. § 106.4(b). Moreover, a debt left unpaid for months by a committee that is not in the business of extending credit is itself a contribution. *See* 11 C.F.R. § 100.55. The Wiener Campaign's belated disclosure of the \$24,800 debt, made only by amending its July report in September, also raises questions under 52 U.S.C. § 30104(b)(8). Additionally, if Families for an Affordable San Francisco provided unreported in-kind contributions, Respondents may have violated FECA's reporting requirements.

IV. MATTERS WARRANTING FEC INVESTIGATION

The Commission must immediately investigate whether Respondents have used the coordinated-canvassing framework established in AO 2024-01 to subsidize general campaign operations. Specifically:

- **Shared Headquarters and Expenses.** Does the two-thirds/one-third allocation of headquarters rent and operating expenses reflect actual use by each committee? Did the Wiener Campaign pay the full fair-market value of facilities and services it received?
- **Shared Personnel.** Did Families for an Affordable San Francisco employees and consultants perform campaign functions beyond canvassing? Were their responsibilities, hours, and compensation properly allocated and documented?

- **Campaign Events.** Was the May 15 birthday celebration and headquarters opening genuinely a canvassing event? Were the DJ, security, and other event expenses properly allocated, or did Families for an Affordable San Francisco subsidize expenses attributable to the Wiener Campaign?
- **Polling.** Did the Wiener Campaign receive or use EMC Research polling data before paying for it? Did the Wiener Campaign pay fair-market value, and did Families for an Affordable San Francisco improperly advance or finance its share of the polling expense?
- **Reporting and Disclosure.** Did Respondents accurately report their shared expenses, reimbursements, debts, and any resulting in-kind contributions?

These questions are material to determining whether Respondents' arrangements complied with FECA or resulted in impermissible contributions to the Wiener Campaign.

V. CONCLUSION

For the foregoing reasons, Complainant respectfully requests that the Commission conduct an immediate investigation into these allegations; declare the Respondents to have violated FECA and FEC regulations; impose sanctions appropriate to these violations; and take such further action as may be appropriate.

Respectfully submitted, on this 30th day of October, 2026.



Saikat Chakrabarti
800 Irving St.
San Francisco, CA

Verification

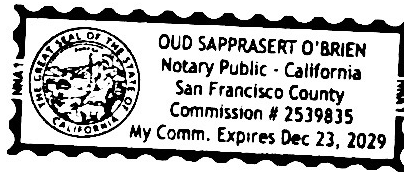
Pursuant to 11 C.F.R. 111.4, I declare, under penalty of perjury, that the facts presented in this complaint are true and correct to the best of my knowledge and belief.



Saikat Chakrabarti

Date: 10/30/2026

SUBSCRIBED AND SWORN to before me this 30th day of October, 2026.


Notary Public

CALIFORNIA ALL-PURPOSE ACKNOWLEDGMENT**CIVIL CODE § 1189**

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California)County of San Francisco)On October 30, 2016 before me, ODD SAPPRASERT O'BRIEN, NOTARY PUBLIC
Date Here Insert Name and Title of the Officer

personally appeared

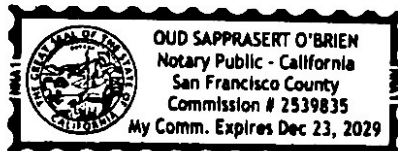
SAIKAT CHAURABARTI

Name(s) of Signer(s)

who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.



Signature

Odd Sapprasert O'Brien
Signature of Notary Public

Place Notary Seal Above

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Though this section is optional, completing this information can deter alteration of the document or fraudulent reattachment of this form to an unintended document.

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Signer's Name: _____

☐ Corporate Officer — Title(s): _____☐ Partner — ☐ Limited ☐ General☐ Individual ☐ Attorney in Fact☐ Trustee ☐ Guardian or Conservator☐ Other: _____

Signer Is Representing: _____

Signer's Name: _____

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EXHIBIT A

Mark Alfred, “Pelosi’s Potential Successor Is Pushing the Limits of Super PAC Coordination,” The Washington Sun (Oct. 15, 2026)

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INFLUENCE

Pelosi's Potential Successor Is Pushing the Limits of Super PAC Coordination

Spending records raise questions about Democrat Scott Wiener's open coordination with Families for an Affordable San Francisco.



State Sen. Scott Wiener has forged a close relationship with a supportive super PAC during his run for Congress in the California district Rep. Nancy Pelosi is vacating. (Scott Strazzante/San Francisco Chronicle via AP)

By Mark Alfred

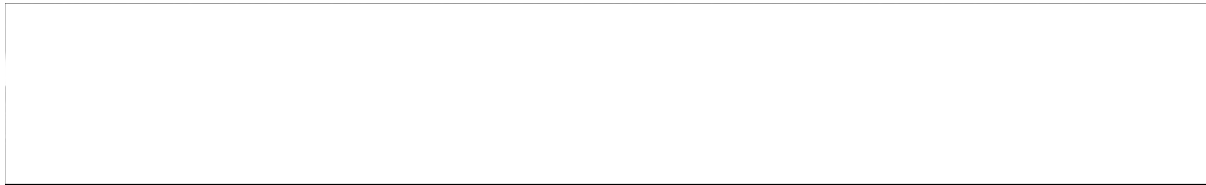
October 15, 2026 05:34 a.m.



In the race to replace Nancy Pelosi, the congressional campaign of California state Sen. Scott Wiener has forged an unusual arrangement with a federal super PAC:

They are directly coordinated with one another.

The Wiener campaign and its coordinated super PAC, Families for an Affordable San Francisco, are pushing their relationship to legal extremes — sharing staff, a fundraising consultant, a pollster and a headquarters, according to a Washington Sun review of spending documents filed with the Federal Election Commission.



The super PAC has also spent money in coordination with the campaign on items seemingly unrelated to canvassing — a legally permissible activity usually involving on-the-ground voter outreach — including payments for a DJ at Wiener's birthday party earlier this year.

A 2024 Federal Election Commission [advisory opinion](#) opened the door to super PAC-campaign coordination when it comes to paid canvassing activities, but federal election law typically does not permit campaign committees and super PACs to coordinate efforts beyond that.

TRENDING



As the Number of Days Until the Election Falls, Trump's Numbers Keep Growing



Judge Orders Greg Abbott to Hand Over His Communications With Elon Musk



Robert White Is Rushing to Preserve His Eligibility in the D.C. Delegate Race



Is The Cheesecake Factory a Restaurant for Regular Americans?

Families for an Affordable San Francisco emerged on Oct. 20, two days before Wiener officially entered the primary for California's 11th District. The super PAC, which may raise and spend unlimited amounts of money, [describes itself](#) as a "coordinated campaign supporting Scott Wiener's congressional campaign."

Wiener placed first in the June primary and is facing Connie Chan, a fellow Democrat who sits on the San Francisco Board of Supervisors, in November's election.

Pelosi, who has served in the House since 1987, [endorsed](#) Chan over Wiener.

The super PAC's treasurer is Todd David, whose work with Wiener goes back over a decade. David was Wiener's political director in the 2016 state senate race.



Scott Wiener campaigns for California State Senate in 2016 with the help of supporters armed with inflatable giraffes — he embraced the nickname “Giraffe” given to him by Chinese community leader Rose Pak. (Paul Chinn/AP)

Wiener's campaign committee pays David for "campaign consulting" while the super PAC pays him for "canvassing consulting." David's son Noah is listed as a member of the "campaign team" on the super PAC's website and receives paychecks from the campaign while using an email address connected to the super PAC.

"We fully comply with Campaign Finance Law," Families for an Affordable San Francisco spokesperson Sam Singer said in a statement to The Sun. "Any services provided to the Congressional Campaign that go beyond the scope of a Coordinated Canvass are paid for by the Congressional Campaign, an arrangement that fully complies with Campaign Finance Law."

The Wiener campaign did not respond to a detailed list of questions about its relationship with the super PAC.

In a statement, the Wiener campaign said that while the candidate "supports overturning Citizens United and will fight to do so when he gets to Congress," he would not put his campaign at a disadvantage in the race against Chan.

"At the end of the day, when the voters look at Scott's record, they will see a fighter who has beaten powerful corporate interests over and over again to deliver some of San Francisco and California's most impactful law," Wiener campaign spokesperson Joe Arellano said in a statement.

The Chan campaign is demanding that Wiener release records related to his campaign's coordinated activities.



Connie Chan speaks during a forum in San Francisco on Jan. 7, 2026. (Scott Strazzante/San Francisco Chronicle via AP)

“Scott Wiener found a loophole and drove an entire second campaign through it,” Chan campaign spokesperson Ian Krager said. “Wiener and his super PAC must immediately end any coordination beyond the narrow canvassing exception and publicly release every contract, time sheet and data-sharing record. Until then, he

does not have an independent super PAC supporting him. He has a campaign without contribution limits.”

It is often difficult to determine where one Wiener committee begins and the other ends. The super PAC pays for the “[Team Wiener](#)” website, which lists 20 staffers under a banner reading “our campaign team.” At least five people are paid by both the campaign committee and the super PAC at the same time. Super PAC-funded emails promote the campaign committee’s merch store, which generates money for Wiener’s campaign.

The super PAC has raised nearly \$900,000 through June 30, largely from unions and individuals giving large sums of cash that are too big for Wiener’s own campaign committee to legally accept. The super PAC is only allowed to accept unlimited donations so long as it adheres to campaign finance regulations. It maintains that all its spending and coordination are permissible under the FEC’s 2024 opinion.

The Memo

Since super PACs may raise unlimited amounts of money, federal election law generally does not allow them to coordinate with a congressional candidate in the way that Families for an Affordable San Francisco and Scott Wiener for Congress are.

Campaigns sometimes skirt this rule by employing an indirect method of communication known as “[redboxing](#),” where a campaign publicly posts details about what it wants voters to hear or see, sometimes within an actual red box buried in a corner of its campaign website. Another political group, such as a super PAC, may then take that information and adjust their own messaging to voters accordingly — without violating federal coordination prohibitions.

Wiener’s campaign takes that approach, sharing a 2,085-word [missive](#) on its website that details what would-be voters need to “see” and “hear.” Families for an Affordable San Francisco’s website also hosts a welcome video of Wiener himself and

shares the campaign's [Mobilize](#) feed live. The Mobilize site hosts invites for over 100 events, each bearing the disclaimer "Paid for by Scott Wiener for Congress." Some of the events are led by staffers on the super PAC's payroll.

Families for an Affordable San Francisco shared a [memo](#) prepared by Andrew Werbrock, a campaign finance lawyer and a founding partner at law firm Olson Remcho, that details its interpretation of the 2024 FEC opinion: "[T]he FEC has found that certain types of communications do not qualify as 'public communications' and, therefore, do not result in coordinated communications, even if they are coordinated with a candidate."

"Under that analysis, a PAC can conduct a canvass in coordination with a candidate without making a contribution, subject to" certain parameters, the memo said. Canvassing typically consists of paid canvassers or volunteers going door-to-door or working the phones, it said.

One of the parameters is that the super PAC "may not reproduce or redistribute the candidate's own materials. Such activity would qualify as an in-kind contribution to the candidate, subject to the federal contribution limits and source restrictions."

Olson Remcho has been on both the campaign and super PAC's payrolls; both paid the firm on April 16 for "legal services," 10 days after the memo was prepared. It's one of a number of shared vendors that include a fundraising consultant, Bedford Grove, and another consultant, KMM Strategies.

Federal campaign finance regulators are broadly viewed as toothless, and the restrictions on what campaigns can and cannot get away with have only loosened in recent years. Because of a [lack of action](#) by President Donald Trump, and more recently, the U.S. Senate, the FEC has [not had enough commissioners](#) to issue penalties, pursue audits or approve civil investigations [since May 2025](#).

"The law on coordination is, you know, almost a joke at this point because of a series of rulings by the FEC and failures to pursue investigations," said Ellen Weintraub, a Democrat who served as an FEC commissioner from 2002 to 2025, including four stints as chairperson.

"I wouldn't recommend it, but the FEC has not done a particularly effective job of policing this kind of thing," Weintraub said of campaign-PAC coordination. "I cannot recall seeing very many instances of the super PAC and the candidate actually sharing space; it's not a good look for sure."

Wiener's Birthday Bash

The pro-Wiener super PAC broadly characterizes its coordinated activities with Wiener's campaign as "canvassing" even when there is little to no evidence of such.

Take, for instance, "Scott's B-Day Bash & Office Grand Opening."

The May 15 opening of the Wiener campaign's headquarters at 2055 Market St. in San Francisco coincided with the week of Wiener's birthday, and the campaign [promised](#) a DJ "to keep the vibes going" and drag performances "to christen the space." It delivered on both, per photos and videos of the event [posted](#) to social media.

In party invitations and jointly posted Instagram updates, neither the super PAC nor Wiener's campaign mentioned canvassing as part of the party. But when it came time to pay the DJ, the party was described as a canvassing event by the super PAC.

The DJ, Chloe Young, is also a salaried employee of the super PAC. The super PAC paid Young \$825 for "DJ services for canvassing office event." The campaign later [paid](#) the super PAC \$275 for "campaign event entertainment" — exactly a third of the cost of the DJ.

This 2:1 split is consistent among other expenses jointly incurred by the Wiener campaign and super PAC.

The campaign [reimbursed](#) David \$255 for “Campaign event security,” while the super PAC [reimbursed](#) David \$510 for security for a “canvassing event” on the day of the birthday party.

On the June 2 primary, the super PAC [spent](#) \$1,338.52 at Costco for “food and beverage for canvassing.” The campaign later [paid](#) it back \$446.17 for “office supplies” — a 2:1 split down to the penny. Rent for a campaign headquarters is also split 2:1.

Conflicting payment descriptions are also present among staffers supporting Wiener.

The super PAC paid Rebecca Kee \$3,000 for “canvassing consulting,” but her profile on the Team Wiener site until recently listed her role as “Events, endorsements, and rapid response across the campaign,” according to federal records. Wiener’s campaign paid her \$5,250 in “campaign consulting” over the same weeks, and the PAC paid her another \$750 for “project management consulting.”

A key parameter of Olson Remcho’s memo is that “The PAC must either recruit, employ, train, and direct the canvassers itself, or retain a vendor to do so.”

Jose Luis Gandara, a super PAC employee and the campaign's "Policy Lead & LGBTQ Outreach Manager," has led several GOTV canvasses, according to invites reviewed by The Sun that were labeled "Paid for by Scott Wiener for Congress."

If super PAC staff were being paid to service campaign events, and the campaign did not reimburse the super PAC at fair market value, then the super PAC would be making an illegal in-kind contribution, [per](#) federal regulations.

Families for an Affordable San Francisco has raised nearly \$900,000 in support of Wiener's candidacy through June 30, per FEC [records](#). Most of that money came from two union super PACs, which each gave \$250,000 and individuals, including Andrew Chatham, the vice president of engineering at Waymo.

On June 29, the super PAC [paid](#) **EMC Research** \$49,600 for "canvassing polling data." In September, the campaign [updated](#) a July filing to include a \$24,800 debt — half the cost of the poll. No filings show that debt as being paid per the most recent reports; the campaign has reimbursed the super PAC nearly \$10,000 to date.

Paying another committee's bills can effectively be a loan, which would count as an impermissible contribution. Wiener himself has [said](#) he opposes the Supreme Court's 2010 decision in Citizens United v. FEC that opened the door to super PACs and their raising unlimited amounts of money. He has also dinged Chan for accepting super PAC support from a former rival.

Saikat Chakrabarti, a [self-funded multimillionaire](#) who placed third in the primary, has urged his supporters to vote for Chan, a fellow progressive, over Wiener, who is viewed as more moderate.

A few super PACs are supporting Chan. They are contributing six figures each to bolster her run, including SF Solidarity PAC, which is funded by Chakrabarti, who also serves as its treasurer.

AUTHOR

Mark Alfred is a reporter at The Washington Sun and an Allbritton Journalism Institute fellow.

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