

BEFORE THE FEDERAL ELECTION COMMISSION OF THE UNITED STATES OF AMERICA

In the Matter of:  
Yevgeny “Eugene” Vindman  
Vindman for Congress  
Allison Murray, Treasurer

MUR No. \_\_\_\_\_

**COMPLAINT**

1. Complainant brings this complaint before the Federal Election Commission (“FEC” or “Commission”) seeking an immediate investigation and enforcement action against Yevgeny “Eugene” Vindman, Vindman for Congress, and Allison Murray in her official capacity as Treasurer (“Committee”) for violations of the Federal Election Campaign Act (“FECA” or “Act”).
2. This complaint is filed pursuant to 52 U.S.C. § 30109(a)(1) and is based on information providing reason to believe that:
3. Respondents have converted campaign funds for personal use in violation of 52 U.S.C. § 30114(b)(1) and 11 C.F.R. § 113.2(e).

**STATEMENT OF THE LAW**

4. 52 U.S.C. § 30114(b)(1) prohibits the conversion of contributions given to a campaign committee to personal use by any person.<sup>1</sup>
5. Campaign funds are deemed to have been “converted to personal use if the contribution or amount is used to fulfill any commitment, obligation, or expense of a person that would exist irrespective of the candidate’s election campaign or individual’s duties as a holder of Federal office[.]”<sup>2</sup>
6. As a general matter, “[t]he expenses associated with marketing a book that a commercial publisher has published and for which it pays royalties to the author are expenses that exist irrespective of the candidate’s election campaign or duties as a holder of Federal office. Therefore ... contributions accepted by a candidate may not be used to fulfill these expenses.”<sup>3</sup>
7. The Commission has long recognized that a political committee’s mailing lists are assets that have value and “that are frequently sold, rented, or exchanged in a market.”<sup>4</sup> The use of a campaign committee’s assets to promote a book “ordinarily constitute[s] a prohibited personal use of the contributions that paid for the asset.”<sup>5</sup>
8. The Commission has assessed “on a case-by-case basis” whether the use of campaign funds to purchase a candidate’s book is an impermissible “personal use” based on the facts of each individual case.<sup>6</sup>
9. The Commission has approved the use of campaign funds to purchase a candidate’s book in narrow circumstances when certain guardrails are applied to ensure that the candidate is not personally enriched. Specifically:

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<sup>1</sup> See also 11 C.F.R. § 113.2(e).

<sup>2</sup> 52 U.S.C. § 30114(b)(2); 11 C.F.R. § 113.1(g) (“*Personal use* means any use of funds in a campaign account of a present or former candidate to fulfill a commitment, obligation or expense of any person that would exist irrespective of the candidate’s campaign or duties as a Federal officeholder.”).

<sup>3</sup> Advisory Opinion [2006-7](#).

<sup>4</sup> Advisory Opinion [2014-06](#).

<sup>5</sup> Advisory Opinion [2006-7](#).

<sup>6</sup> Advisory Opinion [2014-10](#); Advisory Opinion [2014-06](#).

- Campaign funds may be used to make book purchases solely for distribution to contributors and supporters, and the quantity purchased may not exceed the number needed for such distribution.<sup>7</sup>
  - The Commission has approved committee purchases of candidate-authored books only “if the publisher: (1) donates the candidate’s royalties for his campaign’s book purchases to a charitable organization that is not associated with the candidate and (2) excludes such sales from the calculation of royalties that accrue to the candidate.”<sup>8</sup>
  - The amount of promotional material posted on the campaign’s website or social media pages to promote a candidate’s book must be *de minimis*, which has been defined by the Commission to mean “a single sentence, or, at most, two sentences of promotional material about a candidate’s book.”<sup>9</sup>
10. 52 U.S.C. § 30114(b)(1) prohibits the conversion of campaign funds “by *any person* to personal use” (emphasis added). Accordingly, the restrictions the Commission has imposed on the use of campaign funds for disbursements for book purchases that generate royalties or other payments to a candidate apply equally to a candidate’s use of campaign funds for book purchases that enrich the candidate’s brother. “[N]either the candidate nor the candidate’s authorized committee may convert contributions accepted by the candidate to the personal use of the candidate *or any other person*.”<sup>10</sup>

### **STATEMENT OF FACTS**

11. Representative Vindman currently represents Virginia’s 7th District in the U.S. House of Representatives.<sup>11</sup> His principal campaign committee is Vindman for Congress, and Allison Murray is the committee’s treasurer.
12. Representative Vindman’s brother, Alexander Vindman, is the author of a book titled, “The Folly of Realism: How the West Deceived Itself About Russia and Betrayed Ukraine” (hereinafter, “The Folly of Realism”), which was released on February 25, 2025.<sup>12</sup>
13. On February 27, 2025, Representative Vindman’s campaign committee, Vindman for Congress, sent a fundraising email with the subject line: “Alex’s New Book, The Folly of Realism: How the West Deceived Itself About Russia and Betrayed Ukraine, Unfortunately Couldn’t Be More Timely and Accurate.” The email states in part:

Alex isn’t just known for his testimony that led to Trump’s first impeachment – he has spent decades in national security, advising on U.S.-Russia strategy at the highest levels. He was the director for European Affairs on the National Security Council, served as the Political-Military Affairs Officer for Russia for the Chairman of the Joint Chiefs of Staff, where he wrote the Russia strategy, and as an attaché at the US Embassies in Moscow and Kyiv. His book reveals profound truths about the mistakes the U.S. repeats, how Western leaders enabled Putin’s aggression, and provides a path for the U.S. to recapture moral leadership...Defending democracy starts with knowing the truth. If you want to stand with us, chip in \$50 dollars by March 7, 2025 to receive a copy. If you are one of the first 500 donors, you will get a signed edition.<sup>13</sup>

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<sup>7</sup> Advisory Opinion [2014-06](#).

<sup>8</sup> *Id.* (citing Advisory Opinion [2001-08](#) and Advisory Opinion [2011-02](#)).

<sup>9</sup> Advisory Opinion [2011-02](#).

<sup>10</sup> Advisory Opinion [2008-17](#) (emphasis added).

<sup>11</sup> Representative Eugene Vindman, [About](#).

<sup>12</sup> Ryan King, Dem Rep. Eugene Vindman’s Campaign Dropped Nearly \$39K at Florida Bookstore Where His Brother Held Signing Events for His Bestseller, [New York Post](#) (Apr. 24, 2025); Barnes & Noble, [The Folly of Realism: How the West Deceived Itself About Russia and Betrayed Ukraine](#), [Barnesandnoble.com](#) (Accessed May 19, 2025).

<sup>13</sup> [Exhibit A](#).

14. On March 7, 2025, Representative Vindman’s campaign committee sent yet another fundraising email promoting Alexander’s book, this one with the subject line, “LAST CHANCE: Get A Copy of Alex’s New Book About the Truth of Russia and Ukraine.” In addition to offering the book in exchange for a \$50 contribution, the bulk of this email includes copy written by Alexander touting his book and his foreign policy experience, and emphasizes that “[b]y donating \$50 today, not only will you be supporting my effort to set the record straight on Russia’s invasion of Ukraine, but you will also be supporting my brother’s movement to defend democracy from Trump’s authoritarian takeover.”<sup>14</sup>
15. Vindman for Congress’ 2025 April Quarterly Report disclosed that, on March 7, 2025, the same day that the committee sent the second fundraising email promoting Alexander Vindman’s book “The Folly of Realism,” it also made a \$7,809.55 disbursement for a “Fundraising Expense” to Books & Books, a retail bookstore in Coral Gables, Florida.<sup>15</sup> On March 9, 2025, two days after Vindman for Congress reported making the \$7,809.55 disbursement to Books & Books, Alexander Vindman posted a photograph to his X account featuring him seated in a bookstore behind copies of “The Folly of Realism,” with the caption, “Your Books are signed and on the way! Thank you for ordering from the iconic Books and Books in Miami Florida!”<sup>16</sup>
16. Vindman for Congress’ 2025 April Quarterly Report disclosed another disbursement, in the amount of \$30,972.97, made to Books & Books on March 20, 2025, also for a “Fundraising Expense.”<sup>17</sup> On April 12, 2025, Alexander Vindman posted additional photos on X that showed him seated in a bookstore alongside copies of “The Folly of Realism,” and that included the caption, “Fort Books! Signed another 800 copies at the iconic @BooksandBooks in Coral Gables. Get you [sic] copy of The Folly of Realism.”<sup>18</sup>

### **CAUSE OF ACTION**

#### **AGAINST RESPONDENTS YEVGENY “EUGENE” VINDMAN, VINDMAN FOR CONGRESS, AND ALLISON MURRAY AS TREASURER**

##### **Converting Campaign Funds for Personal Use in Violation of 52 U.S.C. § 30114(b)(1) and 11 C.F.R. § 113.2(e)**

17. The Commission has been clear regarding the facts and circumstances that need to be present for a book deal to be compliant with FECA. Most notable in this case is the overt promotion of a book authored by Representative Vindman’s brother, Alexander. Marketing costs have been specifically highlighted by the Commission as an *expense of a person* “that would exist irrespective” of the campaign.<sup>19</sup> Here, Vindman for Congress has significantly subsidized the marketing costs that should be borne by Alexander Vindman and his book’s commercial publisher. The Commission’s *de minimis* limitation on book promotion, delineated as a mere one to two sentences, is, in this instance, exhausted by a complete and promotive takeover by Alexander Vindman advertising his book.<sup>20</sup> Therefore, Eugene Vindman and Vindman for Congress appear to have violated 52 U.S.C. § 30114(b)(1) and 11 C.F.R. § 113.2(e) by using campaign funds and assets to subsidize marketing expenses for Alexander Vindman’s book in excess of the *de minimis* amount that the Commission has previously sanctioned.
18. Additionally, the Commission has recognized email lists as an asset of the campaign committee, thereby making the clear use of Vindman for Congress’ email list to market Alexander Vindman’s book through the fundraising emails sent on February 27 and March 7, 2025, respectively – in the absence of fair market value compensation – supportive of a finding that the Vindman for Congress

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<sup>14</sup> [Exhibit B](#).

<sup>15</sup> Federal Election Commission, Vindman for Congress, 2025 April Quarterly Report ([Schedule B](#)), p. 1655 (Mar. 7, 2025).

<sup>16</sup> Alexander S. Vindman (@AVindman), [X](#) (Mar. 9, 2025).

<sup>17</sup> Federal Election Commission, Vindman for Congress, 2025 April Quarterly Report ([Schedule B](#)), p. 1659 (Mar. 7, 2025).

<sup>18</sup> Alexander S. Vindman (@AVindman), [X](#) (Apr. 12, 2025).

<sup>19</sup> Advisory Opinion [2006-7](#).

<sup>20</sup> Advisory Opinion [2011-02](#); [Exhibit A](#); [Exhibit B](#).

campaign funds have been misappropriated for personal use by Representative Vindman and his brother, Alexander, in violation of 52 U.S.C. § 30114(b)(1) and 11 C.F.R. § 113.2(e).<sup>21</sup>

19. Furthermore, Vindman for Congress' two disbursements to Books & Books for "Fundraising Expense[s]," which together totaled more than \$38,782, appear to have been made for purchases of, and/or promotional events for, Alexander Vindman's "The Folly of Realism," as evidenced by the proximity of the disbursements' dates and when Alexander Vindman held book-signing events at Books & Books. Emails distributed by Vindman for Congress on February 27 and March 7, 2025 (see above), indicate the books were purchased by the campaign committee and then used as a fundraising tool. Accordingly, there is reason to believe that Vindman for Congress converted campaign funds to personal use by purchasing and promoting Alexander Vindman's book through the retailer Books & Books, in violation of 52 U.S.C. § 30114(b)(1) and 11 C.F.R. § 113.2(e). Publicly available information does not disclose other relevant details, such as the number of copies of "The Folly of Realism" purchased by Vindman for Congress, and what royalties Alexander Vindman received as a result of Vindman for Congress' book purchases.

### **PRAYER FOR RELIEF**

20. Wherefore, the Commission should find reason to believe that Yevgeny "Eugene" Vindman, Vindman for Congress, and Allison Murray as Treasurer have violated prohibitions against converting campaign funds to personal use in violation of 52 U.S.C. § 30114(b)(1) and 11 C.F.R. § 113.2(e). The Commission should conduct an immediate investigation under 52 U.S.C. § 30109(a)(2) and determine and impose appropriate sanctions for any and all violations. Furthermore, the Commission should enjoin respondent from any future violations, and impose any necessary and appropriate remedies to ensure respondent future compliance with FECA.

May 19, 2025

Respectfully Submitted,

*Caitlin Sutherland*

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Caitlin Sutherland, Executive Director  
Americans for Public Trust  
107 South West Street, Suite 442  
Alexandria, VA 22314

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<sup>21</sup> Advisory Opinion [2014-06](#).

VERIFICATION

21. The complainants listed below hereby verify that the statements made in the attached Complaint are, upon their information and belief, true.

For Complainant "Americans for Public Trust"

*Caitlin Sutherland*

Caitlin Sutherland

~~XXXXXXXXXX~~ State of Texas  
~~XXXXXXXXXX~~ Commonwealth of Virginia  
~~XXXXXXXXXXXXXXXXXXXX~~ Tarrant County

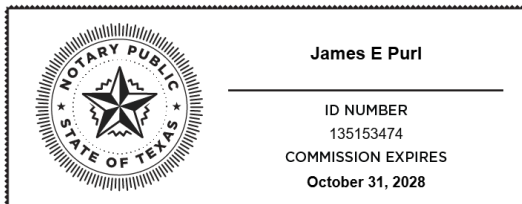
The foregoing instrument was subscribed and sworn to before me this 19th day of May 2025 by Caitlin Sutherland.

*James E Purl*

Notary Public

Notary registration number: 135153474

My commission expires: 10/31/2028



State of Texas

County of Tarrant

Sworn to and subscribed before me

on 05/19/2025 by Caitlin Sutherland.

Electronically signed and notarized online using the Proof platform.

## Exhibit A

Alex isn't just known for his testimony that led to Trump's first impeachment — he has spent decades in national security, advising on U.S.-Russia strategy at the highest levels. He was the director for European Affairs on the National Security Council, served as the Political-Military Affairs Officer for Russia for the Chairman of the Joint Chiefs of Staff, where he wrote the Russia strategy, and as an attaché at the US Embassies in Moscow and Kyiv. His book reveals profound truths about the mistakes the U.S. repeats, how Western leaders enabled Putin's aggression, and provides a path for the U.S. to recapture moral leadership.

John, Trump is throwing out countless dangerous lies about Russia's invasion of Ukraine to his benefit. He's gone as far as to blame Ukraine for the war, declaring that Russia has "won" Ukrainian land, and calling President Zelenskyy a dictator.

Trump is trying to rewrite history and distort the truth of the catastrophe Putin has caused in Ukraine. But we must hold truth to power, and it begins with each one of us knowing what happened, understanding what went wrong, and learning lessons we must learn to prevent further catastrophe.

**Defending democracy starts with knowing the truth. If you want to stand with us, chip in \$50 dollars by March 7, 2025 to receive a copy. If you are one of the first 500 donors, you will get a signed edition.**

**CLAIM YOUR COPY**

Thanks for continuing to stand by our side. Together, we will fight to ensure democracy prevails.

Eugene Vindman

Paid For By Vindman for Congress


This email was sent to xxxxxx@gmail.com. Email is a very important way we communicate with supporters like you, but if you want to, you can unsubscribe here.

Eugene Vindman served in the U.S. Army and the National Security Council. Use of rank, title, and photographs in uniform does not imply endorsement by the Department of Defense, U.S. Army or the National Security Council.

(Eugene Vindman for Congress, Alex's New Book, The Folly of Realism: How the West Deceived Itself About Russia and Betrayed Ukraine, Unfortunately Couldn't Be More Timely and Accurate, [Archive of Political Emails](#) (Feb. 27, 2025))



## Exhibit B



John, it's Alexander Vindman.

My new book, *The Folly of Realism: How the West Deceived Itself About Russia and Betrayed Ukraine*, is out now and couldn't be more timely.

Recently, Trump attacked President Zelenskyy — publicly berating him for telling the truth about Russia's war. Instead of standing with a U.S. ally, Trump humiliated him, all to cater to Putin's agenda.

Let's be clear: Trump isn't just abandoning Ukraine — he's aligning himself with a brutal dictator.

In times like this, the truth must prevail. That's why I want you to be among the first to get a copy of my book.

[Donate \\$50 or more before March 7th to my twin brother Eugene's campaign for Congress today to get a copy of my new book. If you are one of the first 500 people to donate, you will get a signed edition.](#)

**CLAIM YOUR COPY**

Most of you know me from Trump's first impeachment. My brother and I exposed his scheme to withhold military aid from Ukraine unless Zelenskyy investigated President Biden.

(Eugene Vindman for Congress, LAST CHANCE: Get A Copy of Alex's New Book About the Truth of Russia and Ukraine, [Archive of Political Emails](#) (Mar. 7. 2025)

But my experience goes beyond that — I've spent my career in national security. I've advised top U.S. officials on Russia and Ukraine, been the director for European Affairs on the National Security Council, served as the Political-Military Affairs Officer for Russia, and served in embassies in Moscow and Kyiv.

My book highlights the overlooked history between Ukraine and Russia, lays bare the mistakes the U.S. and the West made in underestimating Putin, reveals how Western leaders enabled Putin's aggression, and provides a path for how America can reclaim its moral leadership.

Trump continues to undermine Ukraine, cozy up to Putin, and distort history to serve his own agenda. We cannot let him distort the truth in an effort to justify his corruption.

By donating \$50 today, not only will you be supporting my effort to set the record straight on Russia's invasion of Ukraine, but you will also be supporting my brother's movement to defend democracy from Trump's authoritarian takeover.

[If you are interested, donate \\$50 or more by March 7th to claim your copy and support Eugene's fight to defend democracy.](#)

**CLAIM YOUR COPY**

Thank you,  
Alexander Vindman

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This email was sent to xxxxxx@gmail.com. Email is a very important way we communicate with supporters like you, but if you want to, you can unsubscribe here.

Eugene Vindman served in the U.S. Army and the National Security Council. Use of rank, title, and photographs in uniform does not imply endorsement by the Department of Defense, U.S. Army or the National Security Council.

(Eugene Vindman for Congress, LAST CHANCE: Get A Copy of Alex's New Book About the Truth of Russia and Ukraine, [Archive of Political Emails](#) (Mar. 7. 2025)