

**BEFORE THE
FEDERAL ELECTION COMMISSION**

Carol Ronen
6033 N Sheridan Road, Apt 9 A
Chicago, IL 60660

Complainant,

v.

Daniel Biss
PO Box #549
Evanston, IL 60204

Biss for Congress
PO Box #549
Evanston, IL 60204

and

Friends of Daniel Biss
3255 Central Street
Evanston, IL 60201

Respondents.

COMPLAINT

Complainant files this complaint under 52 U.S.C. § 30109(a)(1) against Daniel Biss, Biss for Congress, and Friends of Daniel Biss, for violating the Federal Election Campaign Act of 1971, as amended (“the Act”), and Federal Election Commission (“FEC”) regulations, as described below.

A. FACTS

Daniel Biss a candidate for U.S. House of Representatives in the 9th Congressional District of Illinois.¹ Biss for Congress is his principal campaign committee in that election. Biss is simultaneously running to be the male representative of the 9th Congressional District for the State Central Committee of the Democratic Party of Illinois.² His nonfederal committee, Friends of Daniel Biss, has received multiple contributions in excess of federal limits and restrictions.³

Friends of Daniel Biss, the nonfederal committee Biss formed for his state central committee race, has distributed a mailer expressly attacking the candidacy of an opponent in his *congressional* race, Laura Fine.⁴ Biss and Fine are *not* opposing candidates in the state central committee race. The voters will elect both male and female candidates for that office.⁵ But the mailer still attacks Fine. It mimics messaging prominently featured on Biss's congressional campaign's "Voters Need to Know" website, which appears intended to convey the Congressional campaign's desired message in the federal race to its federal supporters.⁶ The mailer apparently takes its attacks from an opposition research document on Biss's congressional

¹ See Daniel Biss Statement of Candidacy, https://docquery.fec.gov/pdf/257_202505239761720257_202505239761720257.pdf (May 23, 2025).

² See Committee Details, Illinois State Board of Elections, <https://www.elections.il.gov/campaigndisclosure/CandidateDetailCD.aspx?ID=fheblrtMdkUH3R0ywpjmtA%03d%03d> (last visited Feb. 22, 2026).

³ See Friends of Daniel Biss D-2 Quarterly Report, Oct. 1, 2025 – Dec. 31, 2025, <https://www.elections.il.gov/campaigndisclosure/ItemizedContributions.aspx?FiledDocID=hyXjnp%02bXPaePFe%02fC8htUBg%03d%03d&ContributionType=zI;4UTaWYkH1RdymXPLZxQwzsAP9P4ghkZA2i61aE;Sd1kUdPzCJLwaPqANp%02f5Re0lmd73vqYn8DQ%03d> (last visited Feb. 22, 2026); Friends of Daniel Biss A-1 Report, Jan. 1, 2026 – March 31, 2026; <https://www.elections.il.gov/campaigndisclosure/ALList.aspx?FiledDocID=9sgOznG0UigvIpuj37J2CdA%03d%03d&ContributionType=wOGh3OTPIKqV2YWjeRmjTeStk426RfVK&Archived=G15sibpnFrQ%03d> (last visited Feb. 22, 2026); see also 10 Ill. Comp. Stat. Ann. 5/9-8.5(b) (state contribution limits).

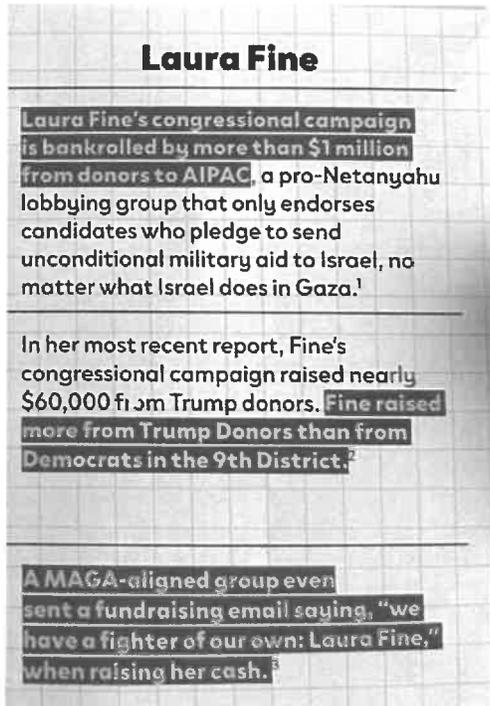
⁴ See Exhibit A, Biss Mailer.

⁵ See 10 ILCS 5/7-8(a).

⁶ See <https://www.danielbiss.com/what-voters-need-to-know> (last visited Feb. 22, 2026) and Exhibit B, Website Screenshot.

campaign website.⁷ A comparison of the relevant sections of the mailer and the website is shown below:

MAILER:



CONGRESSIONAL CAMPAIGN WEBSITE:

Updated: February 20, 2026

OVERVIEW

Laura Fine's campaign is bankrolled by Trump donors, MAGA Republican donors, and AIPAC. That's who she'll be accountable to in Congress - not families in Illinois's 9th District.

SUMMARY

YOUTUBE - Voters over 35 getting information on Youtube should see a mix of unskippable messages that say:

Most importantly, voters across the district need to know that:

- Laura Fine admits that she is being supported by Trump donors. She has taken taken sixty thousand dollars from Trump donors and MAGA Republican donors. A MAGA-aligned group even sent a fundraising email saying, "we have a fighter of our own: Laura Fine," when raising her cash.
- Laura Fine admits that she is being supported by AIPAC donors. Her campaign is bankrolled by more than \$1 million from AIPAC donors, a pro-Netanyahu lobbying group that only endorses candidates who pledge to send unconditional military aid to Israel, no matter what Israel does. She will side with AIPAC on policies that starve children and will fund their war in Gaza with billions of U.S. taxpayer dollars.

B. LEGAL ARGUMENT

Biss has violated the Act by spending nonfederal funds in connection with a federal election. 52 U.S.C. § 30125(e) prohibits a federal candidate or an entity established, maintained, financed, or controlled by a federal candidate from spending funds not subject to the limitations, prohibitions, and reporting requirements of the Act (that is, nonfederal funds) in connection with a federal election. The prohibition includes spending on public communications that promote,

⁷ See <https://www.dropbox.com/s/ef9fj43i1dp6vdsyte5qmr/Laura-Fine-Information.pdf?rlkey=oesohgk627euospj66xzzz7i2&e=1&st=5wh4nak6&dl=0> (linked from <https://www.danielbiss.com/what-voters-need-to-know/>) (last visited Feb. 22, 2026).

attack, support, or oppose a federal candidate.⁸ A narrow exception exists for candidates running also for state or local office. The Act permits dual candidates to spend nonfederal funds *solely* in connection with their state or local election.⁹ Communications under this provision must refer “only to that State or local candidate, to any other candidate for that same State or local office, or both[.]”¹⁰

However, the mailer, paid for by Biss’s nonfederal campaign, is plainly in connection with a federal election. It specifically references and attacks his congressional opponent. It parrots his congressional campaign’s opposition research and core talking points.

The piece misleadingly asks, “which candidate would be better for the State Central Committee?” But Fine is not Biss’s opponent in the state central committee race. Voters select one male and one female committee member from each congressional district.¹¹ Biss is running for the male seat and Fine the female seat. No voter will be forced—or even able—to choose between Biss and Fine in the state central committee race. Far from being “solely in connection with” the state central committee race as the law requires. Biss’s mailer does not even *try* to be in connection with the nonfederal race. The mailer’s reference to the State Central Committee is a sham and a fraud.

⁸ See 52 U.S.C. §§ 30125(e), (f), 30101(20)(A)(iii).

⁹ See 52 U.S.C. § 30125(e); 11 C.F.R. 300.63.

¹⁰ 11 C.F.R. § 300.63.

¹¹ See Illinois Secretary of State, State Central Committees, <https://www.ilsos.gov/content/dam/publications/illinois-bluebook/commiteemen.pdf>.

I accordingly request that the Commission investigate this matter and seek the highest penalties provided by law.

Sincerely,



Carol Ronen

SUBSCRIBED AND SWORN to before me this 24th day of February, 2026.



Notary Public

My Commission Expires:

02/10/2029

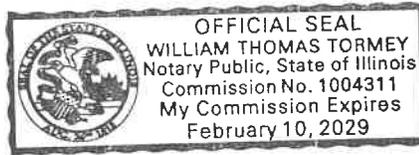


EXHIBIT A

**Which candidate would be better
for the State Central Committee?**





"AIPAC and Trump allies are attacking Daniel Biss. Illinois' 9th district belongs to all of us — not Trump donors or AIPAC.

Democrats cannot let Republicans buy this district. We need real fighters who know how to get things done.

That's why I'm endorsing Daniel Biss."

— Jan Schakowsky

Which candidate would make a better 9th District State Central Committee?

	Daniel Biss	Laura Fine
AIPAC and Gaza	Daniel Biss stood up to AIPAC and their allies. And Biss refused to send in Evanston Police to arrest peaceful protesters on NU's campus.	Laura Fine's congressional campaign is bankrolled by more than \$1 million from donors to AIPAC, a pro-Netanyahu lobbying group that only endorses candidates who pledge to send unconditional military aid to Israel, no matter what Israel does in Gaza. ¹
Standing Up to Trump	Daniel Biss stood up to CBP/ICE Commander Greg Bovino and Trump's ICE assault on Evanston and Chicago. Rachel Maddow called Daniel's national leadership opposing ICE "the handbook around the country."	In her most recent report, Fine's congressional campaign raised nearly \$60,000 from Trump donors. Fine raised more from Trump Donors than from Democrats in the 9th District. ²
Local Democratic Support	76% of Daniel's donations came from Illinois, including more than 1,000 grassroots donors.	AMAGA-aligned group even sent a fundraising email saying, "we have a fighter of our own: Laura Fine," when raising her cash. ³



"The Evanston Handbook I think is starting to be seen as the handbook around the country."

— Rachel Maddow

1. Evanston Now, 10/17/25. Federal Election Commission, 2025-2026. MS Now, 2/10/26.
2. Evanston RoundTable, 2/5/26; WGN, 2/9/26. 3. Evanston RoundTable, 10/22/25

Paid for by Friends of Daniel Biss
3255 Central Street
Evanston, IL 60201

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EXHIBIT B

Updated: February 20, 2026

OVERVIEW

Laura Fine's campaign is bankrolled by Trump donors, MAGA Republican donors, and AIPAC. That's who she'll be accountable to in Congress – not families in Illinois's 9th District.

SUMMARY

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Most importantly, voters across the district need to know that:

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- Laura Fine admits that she is being supported by AIPAC donors. Her campaign is bankrolled by more than \$1 million from AIPAC donors, a pro-Netanyahu lobbying group that only endorses candidates who pledge to send unconditional military aid to Israel, no matter what Israel does. She will side with AIPAC on policies that starve children and will fund their war in Gaza with billions of U.S. taxpayer dollars.

If additional resources are available, other priorities with the above messages include broadcast TV, cable, and mail.

A secondary priority, from partners already planning to run positive communications:

YOUTUBE - Voters over 35 getting information on YouTube should see a mix of unskippable messages that say:

- Daniel Biss believes universal health care is a right, and that we need to stop Republicans' assault on our health care system. In the Illinois state legislature, he voted to guarantee Obamacare would stay in place in Illinois even if Trump repealed it, and in Congress, he'll vote for Medicare for All. He'll also fight to undo Republican cuts to Medicaid and to stop pharmaceutical companies from price-gouging on lifesaving medications.
- Daniel Biss is going after ICE's un-American raids. Biss ordered Evanston police not to cooperate with ICE, got rid of license plate readers when he found out ICE was using them, has held "Know Your Rights" events to help the community defend itself, and he even got tear-gassed protesting ICE raids. In Congress, he will ban Trump's mass deportations, warrantless raids, and policies that rip families apart.

In addition to the above, they should also know that Daniel Biss has earned the endorsements of Rep. Jan Schakowsky and Senator Tammy Duckworth.

If additional resources are available, other priorities include broadcast TV and streaming/CTV.

OTHER DETAILS

Assets can be found here. Ads that the campaign is running can be found here. Research information on Laura Fine can be found here.