

**BEFORE THE
FEDERAL ELECTION COMMISSION**

COMMITTEE TO DEFEAT
THE PRESIDENT
441 North Lee Street, Suite 205
Alexandria, VA 22314
Chairman, Ted Harvey

Complainant,

v.

CORI BUSH
75 North Oaks Plaza
St. Louis, MO 63121,

Respondent.

VERIFIED COMPLAINT

Introduction

Democratic Congresswoman Cori Bush has flouted federal campaign finance law by illegally funneling \$60,000 of campaign funds to her husband, Cortney Merritts. She attempted to conceal this conversion of campaign funds to personal use by falsely reporting the purpose of the disbursements was to compensate him for security service. Merritts, however, is not a licensed security guard; it is illegal for him to provide security-related services anywhere in Bush's congressional district. Indeed, far from being a security guard, it appears during the relevant timeframe he was a mover. Moreover, Cori Bush had provided hundreds of thousands of dollars in payments to PEACE Security, for actually providing her with security services (despite her incessant calls to "defund the police," thereby seeking to strip ordinary Americans of the protection she claims for herself). It is time for the FEC to Defund Cori Bush by stopping her from using her

campaign fund as a personal piggy bank and lying to the American people about it on fraudulent FEC reports.

Parties

1. Complainant COMMITTEE TO DEFEAT THE PRESIDENT (FEC ID #C00544767) is a hybrid *Carey* political committee¹ on a mission to save America from the radical, dangerous policies of the Biden-Harris administration.

2. Respondent Cori Bush was a candidate for the U.S. House of Representatives in the 2022 election and currently serves as a Member of Congress representing Missouri's first congressional district.

Statement of Facts

3. Cori Bush is a radical progressive who ardently supports the Black Lives Matter (“BLM”) movement. Brad Billington & Anthony Rivas, *Congresswoman-Elect Cori Bush Reflects on Her Black Lives Matter Roots and Why She Ran for Congress*, ABC NEWS (Dec. 28, 2020).²

4. The BLM movement is best known for its “fiery but mostly peaceful” riots that have destroyed urban areas, see Joseph Wulfsohn, *CNN Panned for On-Air Graphic Reading “Fiery but Mostly Peaceful Protest” in front of Kenosha Fire*, FOX NEWS (Aug. 27, 2020),³ as well as its founders’ embezzlement of millions of dollars to purchase lavish luxury homes for

¹ See *Carey v. FEC*, 791 F. Supp. 2d 121 (D.D.C. 2011).

² <https://abcnews.go.com/Politics/congresswoman-elect-cori-bush-reflects-black-lives-matter/story?id=74760158>.

³ <https://www.foxnews.com/media/cnn-panned-for-on-air-graphic-reading-fiery-but-mostly-peaceful-protest-in-front-of-kenosha-fire>.

themselves, see Joshua Rhett Miller, *Black Lives Matter Used Donations to Buy \$6 Million Southern California Home: Report*, N.Y. POST (Apr. 4, 2022).⁴

5. Not to be outdone, Bush likewise enriched herself at the expense of her supporters by improperly funneling tens of thousands of dollars from her campaign account to her now-husband and apparently lying about the reasons for those payments on her disclosure forms.

6. According to Cori Bush's disclosure forms filed with the FEC, she paid \$2,500 to Cortney Merritts—who she apparently secretly married in February 2023⁵—on a biweekly over the course of 2022. These payments began on January 14, 2022 and continued through December 30, 2022. Over that time, she made a total of 24 such payments to Merritts, for a total of \$60,000.

7. Because Bush has not yet filed any disclosure reports for 2023, it is presently unknown whether these payments continued into 2023, or are ongoing.

8. According to Bush's disclosure reports, the purpose of each of these \$2,500 payments was "SECURITY SERVICES."

9. On information and belief, Cortney Merritts is not legally permitted to provide security services in either Bush's congressional district—which includes the city of St. Louis and northern St. Louis county—or the District of Columbia.

10. The city of St. Louis, St. Louis County, and the District of Columbia each require individuals to be licensed in order to provide security services.

a. The City of St. Louis Code of Ordinances provides, "No person shall act as a private watchman, private policeman, courier, private security officer, corporate security advisor

⁴ <https://nypost.com/2022/04/04/black-lives-matter-used-donations-to-buy-6-million-southern-california-home-report/>.

⁵ <https://www.riverfronttimes.com/news/cori-bush-secretly-weds-cortney-merritts-39555093>.

or similar security personnel without first obtaining a license from the Board of Police Commissioners.” St. Louis City Code § 8.75A.010.

b. The St. Louis County Code provides, “No person shall act as a security officer, courier, watchman, or the like without first obtaining a valid license therefor” St. Louis Cnty. Code § 701.115(1).

c. The D.C. Code provides, “It shall be unlawful for any person to engage in the business of operating, managing, or conducting a *security agency*, for profit or gain . . . without first obtaining a license to do so.” D.C. Code ch. 28, § 47-2839.01(b) (emphasis added). The term “security agency” is defined as “a person who conducts a business that provides security services.” *Id.* § 47-2839.01(a)(2). The term “security services,” in turn, is defined as “any activity that is performed for compensation by a security officer . . . to protect an individual or property.” *Id.* § 47-2839.01(a)(4). Finally, a “security officer” is “any person privately employed” to “[p]revent assaults . . . at meetings” or “similar illegal occurrences.” D.C. Mun. Regs. § 17-2100.1(c)-(d); *see also* D.C. Code § 47.2839.01(a)(3) (incorporating regulatory definition).

11. On information and belief, Merritts is not a licensed security officer, and does not hold any license to provide security-related services, in the City of St. Louis, St. Louis County, or the District of Columbia. *See* Joe Schoffstall, *Cori Bush’s Campaign Paid Her Husband for Security Services—But He Doesn’t Have a Private Security License*, FOX NEWS (Feb. 28, 2023).⁶

12. The only evidence of any alleged security services by Mr. Merritts is his presence in Bush’s congressional office in Washington D.C. office, which is under the protection of Capitol Police. *See* Ryan King, *Cori Bush’s Marriage to Her Security Guard Prompts Ethics Concerns*

⁶ <https://www.foxnews.com/politics/cori-bushs-campaign-paid-husband-security-services-doesnt-have-private-security-license>.

from *Watchdogs*, GAZETTE (Mar. 1, 2023) (“[Merritts] has become a fixture around [Bush’s] congressional office.”).⁷ Merritts’ presence in Bush’s office may also be explained by the fact they were in a romantic relationship and, following a secret wedding ceremony, he is now her husband.

13. In addition to being unlicensed to provide security services, on information and belief it appears Merritts also founded a moving company in 2018 called Vetted Moving and Couriers. *Id.*

a. That company is located in St. Louis, Missouri, and does not advertise any security-related services.⁸

b. The company’s Yelp page lists “Cortney M.” as the business owner, along with a headshot of him.⁹

c. Consistent with his role as the head of a moving company, on January 3, 2023, Merritts tweeted, “I’m at the Capitol offering to help Kevin McCarthy move his shit out of the Speaker’s office and back into his own.”¹⁰

⁷ https://gazette.com/news/us-world/cori-bushs-marriage-to-her-security-guard-prompts-ethics-concerns-from-watchdogs/article_8b301341-f491-5b92-90ab-36be54b48bdc.html.

⁸ See <https://vettedmovers.com/>.

⁹ <https://www.yelp.com/biz/vetted-movers-and-couriers-st-louis>.

¹⁰ <https://twitter.com/CortneyMerritt4/status/1610388411944427521>.



14. The Yelp page for Vetted Movers and Couriers has a section entitled “About the Business.” If a user presses the “Read more” button, a box appears which, among other things, contains a “Meet the Business Owner” section. Again, the page for Vetted Movers and Couriers identifies “Cortney M.” as the Business Owner. The page states, “I’m a Army veteran and former conductor and Yardmaster with the railroad. After working in the military and railroad for over 20 years total. I decided that I needed a break from being on call and traveling. In my previous jobs, attention to detail and proper safety protocols were absolutely necessary. I bring that same ability and passion to each job to ensure that the client is satisfied at the end of the day.” Again, Merritts’ biography contains no mention of security expertise or security services.

15. The notion that Merritts was providing security services for Bush is further undermined by the fact Bush made 45 payments totaling \$225,281.77 over the course of 2022 to

what appears to have been a real security company, P.E.A.C.E. Security of St. Louis, Missouri,¹¹ for “SECURITY SERVICES.” Throughout most of that period, Bush also made monthly payments of \$5,000 (except for two bi-monthly payments of \$2,500 each in December), totaling \$50,000, to Nathaniel Davis for “SECURITY SERVICES.”

16. It is highly unlikely Bush’s former lover and now husband, who is not licensed to provide security services and runs a moving company, provided \$5,000 worth of security services for Bush every month throughout 2022, authentically bolstering the protection provided by the Capitol Police and the \$225,000 of protection provided by P.E.A.C.E. Security (to say nothing of the otherwise unidentified Nathaniel Davis).

17. Bush cannot pay her lover or husband \$60,000 annually out of her campaign account to hang out in her Washington D.C. office, or with her at their shared home, under the guise of providing “security.”

18. Bush’s systematic payments to her former lover and current husband Merritts constitute blatant embezzlement of campaign funds for private purposes. Bush’s transparent attempt to obfuscate this crime by labeling the payments “SECURITY SERVICES” on her campaign finance disclosure forms constituted fraudulent and false reporting, compounding her criminality.

19. Bush’s six-figure security bills, however prudent, are hypocritical given Bush’s reckless efforts to defund the police, denying the citizens of her district the safety she demands for herself.

¹¹ https://www.facebook.com/ccwstlouis/about_contact_and_basic_info

COUNT I
Converting Campaign Funds to Personal Use
in violation of 52 U.S.C. § 30114(b)(1)

20. Complainant re-alleges the foregoing allegations as if set forth fully herein.

21. The Federal Election Campaign Act (“FECA”) provides, “A contribution or donation described in subsection (a) shall not be converted by any person to personal use.” 52 U.S.C. § 30114(b)(1).

22. Over the course of 2022, Bush made 24 payments of \$2,500 each on a biweekly basis to Cortney Merritts. Bush’s payments to Merritts in 2022 totaled \$60,000. Bush has not yet disclosed whether she has continued making payments to Merritts in 2023. On information and belief, she was in a romantic relationship with him at the time, and has since married him in a secret ceremony.

23. Bush falsely reported on her disclosure forms the purpose of these repeated payments to Merritt was for “SECURITY SERVICES.” The payments, however, were not really for security services.

a. Merritts was not a licensed security officer in St. Louis City, St. Louis County, or Washington, D.C. in 2022.

b. It would have been illegal for Merritts to provide security services in either St. Louis or Washington, D.C. in 2022.

c. Merritts appears to be the founder and owner of a moving company operating in the St. Louis area, and his company does not provide security services.

d. Merritts’ professional biography on his business’ Yelp page omits any mention he provides professional security services. *See supra* note 7.

e. Bush's Capitol office was protected by the Capitol Police. Additionally, over the course of 2022, Bush also paid a total of \$225,281.77 to P.E.A.C.E. Security of St. Louis, as well as an additional total of \$50,000 to Nathaniel Davis, all for "SECURITY SERVICES." Bush already had both governmental and private security.

24. Rather than compensating Merritts for legitimate services at fair market value, Bush illegally embezzled a total of \$60,000 from her campaign account for her romantic partner—and now husband—who ran a moving company and, at most, hung around her office, unarmed, where he could not legally provide security services, and which was under the complete protection of the Capitol Police.

25. By funneling campaign funds to a romantic partner and now husband, Bush illegally converted them to personal use.

WHEREFORE Respondent Cori Bush knowingly, willfully, and repeatedly violated 52 U.S.C. § 30114(b)(1).

COUNT II

Fraudulently Reporting a False Purpose for Campaign Disbursements in violation of 52 U.S.C. § 30104(b)(5)(A) and 11 C.F.R. § 104.3(b)(4)(i)

26. Complainant re-alleges the foregoing allegations as if set forth fully herein.

27. The FECA requires disclosure reports from candidate committees to contain "the name and address of each person to whom an expenditure in an aggregate amount or value in excess of \$200 within the calendar year is made by the reporting committee . . . together with the date, amount, and *purpose* of such operating expenditure." 52 U.S.C. § 30104(b)(5)(A) (emphasis added).

28. Federal regulations require a candidate committee to also report "[e]ach person who has received any disbursement(s) not otherwise disclosed . . . to whom the aggregate amount or

value of such disbursements exceeds \$200 within the election cycle, together with the date, amount, and *purpose* of any such disbursement.” 11 C.F.R. § 104.3(b)(4)(vi) (emphasis added); *cf.* 52 U.S.C. § 30104(b)(6)(A).

29. Federal regulations explain, “[P]urpose means a brief statement or description of why the disbursement was made.” 11 C.F.R. § 104.3(b)(4)(i)(A).

30. Over the course of 2022, Bush made 24 payments of \$2,500 each on a biweekly basis to Courtney Merritts. Bush’s payments to Merritts in 2022 totaled \$60,000. Bush has not yet disclosed whether she has continued making payments to Merritts in 2023. On information and belief, she was in a romantic relationship with him at the time, and has since married him in a secret ceremony. Each of Bush’s disclosure reports falsely claimed these payments were made for “SECURITY SERVICES.”

31. Bush knowingly, intentionally, and fraudulently misstated the purpose of her payments to Merritts, which were not for security services, but rather to benefit her romantic partner and future husband.

a. Merritts was not a licensed security officer in St. Louis City, St. Louis County, or Washington, D.C. in 2022.

b. It would have been illegal for Merritts to provide security services in either St. Louis or Washington, D.C. in 2022.

c. Merritts appears to be the founder and owner of a moving company operating in the St. Louis area, and his company does not provide security services.

d. Merritts’ professional biography on his business’ Yelp page omits any mention he provides professional security services. *See supra* note 7.

e. Bush's Capitol office was protected by the Capitol Police. Additionally, over the course of 2022, Bush also paid a total of \$225,281.77 to P.E.A.C.E. Security of St. Louis, as well as an additional total of \$50,000 to Nathaniel Davis, all for "SECURITY SERVICES." Bush already had both governmental and private security.

32. Bush falsely claimer her payments to Merritts were for "SECURITY SERVICES" to mask her illegal embezzlement of campaign funds to enrich her romantic partner and future husband.

WHEREFORE Respondent Cori Bush knowingly, willfully, and repeatedly violated 52 U.S.C. § 30104(b)(5)(A) and 11 C.F.R. § 104.3(b)(4)(i).

Conclusion

For these reasons, Complainant Committee to Defeat the President respectfully requests the Federal Election Commission commence enforcement proceedings against Respondent Cori Bush.

Respectfully submitted this 3rd day of March, 2023.



Dan Backer, Esq.
CHALMERS, ADAMS, BACKER & KAUFMANN LLC
441 N. Lee Street, Suite 300
Alexandria, VA 22314
(202) 210-5431 (telephone)
(202) 478-0750 (facsimile)
dbacker@chalmersadams.com
Counsel for Committee to Defeat the President

VERIFICATION

I declare under penalty of perjury the foregoing is true and correct to the best of my personal knowledge.

Respectfully submitted,

Dated March 3rd, 2023

Ted Harvey
Ted Harvey, Chairman
Committee to Defeat the President PAC
441 North Lee Street, Suite 205
Alexandria, VA 22314

COMPLETED BEFORE A NOTARY PUBLIC

State of Florida

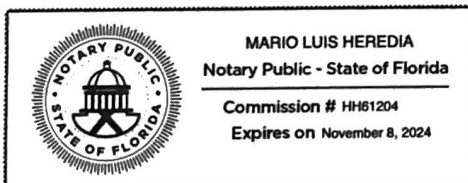
City of Miami

County of Miami Dade

Subscribed, signed, and sworn to before me on this 3rd day of March, 2023.
by William Harvey AKA Ted Harvey who produced DRIVER LICENSE as ID.

My Commission expires on 11/08/2024.

Mario Luis Heredia
Mario Luis Heredia



Notarized online using audio-video communication