

William L. O'Brien, Esq.
Law Office of William L. O'Brien
1 Elm Street, Suite 201
Nashua, NH 03060

October 17, 2026

Office of General Counsel
Federal Election Commission
1050 First Street NE
Washington, DC 20463

Re: Complaint Against Stefany Shaheen for Congress and Patricia Cornell, in Her Official Capacity as Treasurer, for Donor Disclosure Failures, Possible Concealment, and Possible Prohibited Corporate Contributions

Dear General Counsel:

Pursuant to 52 U.S.C. § 30109(a)(1) of the Federal Election Campaign Act ("FECA" or the "Act"), William L. O'Brien, 1 Elm Street, Suite 201, Nashua, NH 03060 (the "Complainant"), submits this formal complaint with the Federal Election Commission ("FEC" or the "Commission") against:

Stefany Shaheen for Congress, FEC Committee ID C00906446, PO Box 193, Manchester, NH 03105 (the "Committee"); and

Patricia Cornell, in her official capacity as Treasurer of the Committee, at the Committee's address (collectively, the "Respondents").¹

The Committee's reported donor information presents occupation entries that disclose no principal occupation, inconsistent employment information for matching donors, and employer descriptions contradicted by primary professional records. The Committee's own filings contain more complete information missing from other entries. Complainant expressly alleges possible concealment of donors' professional and institutional affiliations through these deficient disclosures, including an amendment that replaced a named employer and CEO occupation with "Self Employed" in both fields. The Commission should require Respondents to account for the identified entries and amendments with the contemporaneous records that federal law requires them to maintain.

Complainant requests a reason-to-believe determination and prompt investigation, complete corrective disclosures, the maximum civil penalties justified by the violations established, and enforceable measures to prevent recurrence. The allegations and requests for investigation are organized into three categories: apparent violations, possible violations, and circumstances warranting further Commission investigation.

¹ The Committee is Stefany Shaheen's authorized House campaign committee. Its registration and signed reports identify Patricia Cornell as treasurer. [FEC committee record Statement of Organization filed July 23, 2025](#)

I Background

The public is entitled to receive from Respondents the donor identification that Congress requires federal campaigns to disclose. Employer and occupation information permits voters to identify the economic and professional interests financing a campaign. A field that merely says “Self Employed,” “Civilian,” or “Non Profit” may contain text while hiding the principal job title or position required by the Commission’s regulation. A campaign cannot disregard required identification already in its own records. The recorded replacement of more complete information, together with the repeated discrepancies identified below, supplies a concrete basis to investigate possible concealment.

The factual source is the FEC receipt extract in “STEFANY SHAHEEN FOR CONGRESS.xlsx” (the “Shaheen Contributions Report”), supplied separately as electronic Exhibit F. Its worksheet is “Sheet 1 - schedule_a-2026-10-17.” Row 1 identifies the extract as “schedule_a-2026-10-17T00_19_31”; row 2 supplies the column headings; rows 3–8112 contain 8,110 receipt records. Exhibits A–C identify selected entries by their exact Excel row numbers. Exhibits D and E supply dated filing comparisons, source locators, and supporting record extracts.

Columns G and H of the Shaheen Contributions Report contain employer and occupation. Column I contains the reported receipt amount. Column J contains the reported aggregate.

The Shaheen Contributions Report contains both donor and conduit entries, as well as other organizational receipts. Repeated aggregate values are not additional contributions. The allegations concern the donor identification shown in selected entries; receipt amounts and reported aggregates identify records and establish disclosure thresholds. The extract does not carry forward contribution dates, transaction identifiers, or memo indicators. Exhibit D supplies those details for five independently matched receipts and the relevant original and amended filings. The Commission should correlate the remaining identified rows with its underlying transactions, report versions, and Schedule A line numbers.²

The Committee’s original and amended reports independently confirm challenged disclosures and establish that an amendment removed a named employer and principal occupation from the same Gianotti contribution. Primary records from donors’ firms and organizations provide additional corroboration. Allegations concerning third parties, donor status, source of funds, and Respondents’ internal conduct and possible concealment are made on information and belief, based on the specifically identified worksheet entries, filing comparisons, and public sources.

The three categories below address apparent disclosure violations, possible reporting and source violations, and circumstances warranting further investigation into their scope and possible concealment. Parts II.B through II.D set out the supporting facts; Part II.A states the governing law. The FEC should act promptly to obtain complete public disclosure before the November 3, 2026 election.

² Conduit entries identify an intermediary, such as ActBlue, that collected contributions and forwarded them to the campaign.

II Analysis

A Governing Law

An authorized committee must itemize individual contributions once the applicable aggregate exceeds \$200 in an election cycle. Required identification includes name, mailing address, occupation, and employer. 52 U.S.C. §§ 30101(13)(A),³ 30104(b)(3)(A);⁴ 11 C.F.R. §§ 100.12, 104.3(a)(4)(i). Occupation means the individual's principal job title or position and whether the individual is self-employed. 11 C.F.R. § 100.20. The employer is the person or organization employing the individual. 11 C.F.R. § 100.21. An individual receipt below \$200 does not eliminate disclosure duties when the applicable aggregate exceeds the threshold.⁵

The statutory best-efforts protection requires an actual showing of compliance. The rules prescribe a clear initial request, a stand-alone request for missing identification within 30 days of receipt, use of relevant identification already in the Committee's or its connected organization's possession, and timely supplementation of later-received information. 52 U.S.C. § 30102(i); 11 C.F.R. § 104.7(b)(1)–(4). Relevant records include contributor records, fundraising records, and previously filed reports within the same two-year election cycle. Records supporting the Committee's reports and collection efforts must be retained under 52 U.S.C. § 30102(d) and 11 C.F.R. § 102.9(c)–(d).⁶

The reporting duty rests with the Committee and its treasurer. This complaint invokes § 30104's disclosure obligation. A campaign that leaves required information incomplete must establish the collection and reporting efforts on which it relies.⁷

B Category One: Failure to Disclose a Principal Occupation Violations of FEC Law

Seven identified contributors have occupation fields that, on their face, omit a principal job title or position. Each has a reported aggregate above \$200. Exhibit A sets out eight deficient entries, including two entries for Gianotti:

Harrell Kirstein, Shaheen Contributions Report row 5370. Employer: KIRSTEIN STRATEGIES. Occupation: SELF EMPLOYED. Employment status does not identify the principal job or position.

³ Identification: For an individual, required identification includes full name, mailing address, occupation, and employer. For another person, identification means full name and address. 11 C.F.R. § 100.12. Identification rule

⁴ Itemization of receipts: An authorized committee must itemize contributions from a person other than a political committee whose contributions exceed \$200 in an election cycle, including the required identification and the receipt date and amount. Contributions from committees are itemized regardless of amount. 11 C.F.R. § 104.3(a)(4)(i)–(ii). Itemization requirements

⁵ See the statutory identification and reporting requirements and the Commission's definitions. 52 U.S.C. § 30104 Occupation definition Employer definition.

⁶ A follow-up may be written, including email, or oral and documented in writing. It must seek the missing information and cannot include another solicitation or unrelated material. A public narrative of best-efforts procedures is not universally required; the underlying records are the relevant proof. 11 C.F.R. § 104.7 11 C.F.R. § 102.9 FEC compliance guidance

⁷ Republican National Committee v. Federal Election Commission, 76 F.3d 400 (D.C. Cir. 1996). Commission case summary

Stephen A. Gianotti, Shaheen Contributions Report rows 3695 and 5826. Employer: SELF EMPLOYED. Occupation: SELF EMPLOYED. Neither field identifies the work performed or a principal position.

Michelle Robbins, Shaheen Contributions Report row 3350. Employer: B&B PRINTING. Occupation: SELF EMPLOYED. The entry supplies the business name and employment status while omitting the principal job or position.

Douglas Bush, Shaheen Contributions Report row 1711. Employer: DRB STRATEGIES LLC. Occupation: CIVILIAN. Civilian status does not identify an occupation.

Amy Howell, Shaheen Contributions Report row 1237. Employer: NCOC. Occupation: NON PROFIT. An organizational sector does not identify the contributor's position.

Carlos Daher, Shaheen Contributions Report row 6628. Employer: DAHER MOTORS OF KINGDTON [sic]. Occupation: SELF EMPLOYED. Employment status does not state the individual's principal position.

Steve Maviglio, Shaheen Contributions Report row 7014. Employer: FORZA COMMUNICATIONS. Occupation: SELF EMPLOYED. The occupation field does not identify the work or position.

The amended year-end report identifies Kirstein's December 29, 2025 receipt as transaction 6125462, printed page 156, and Gianotti's November 24, 2025 receipt as transaction 5909140, printed page 97. The deficient occupation descriptions appear in those filed entries. Exhibit D supplies the receipt dates, transaction identifiers, and original and amended report locations; Exhibit E reproduces the pertinent records.⁸

The Gianotti amendment supplies direct evidence that more complete identification was already in the Committee's possession. The original year-end report, filed January 31, 2026, reported the November 24, 2025 \$100 contribution, transaction 5909140, as THE WOODLAND GROUP / CEO, at 34 Woodland Road, North Hampton, with a \$600 aggregate. The April 17, 2026 amendment reported the same transaction, date, amount, address, and aggregate, but replaced both employment fields with SELF EMPLOYED. The original filing establishes prior possession; the amendment establishes removal of the named employer and principal position. This change supports the allegation of a reporting violation and possible concealment and requires Respondents to identify its source, author, approval, and supporting donor communication.⁹

Kirstein's records provide another dated connection. The Committee's Schedule B reports an October 21, 2025 payment of \$21,000 to KIRSTEIN STRATEGIES LLC at 1242 Half Street SW, Washington, DC, for FUNDRAISING CONSULTING, transaction 500040989, printed page 463 of the amended report. That is the same address reported for Harrell Kirstein and his KIRSTEIN STRATEGIES affiliation. The payment precedes the December 29 contribution reported only as SELF EMPLOYED in the occupation field. Together with the OWNER and CONSULTANT

⁸ Committee's amended 2025 year-end report, filed April 17, 2026, covering October 1–December 31, 2025. The entries identify Kirstein's \$1,000 receipt and Gianotti's \$100 receipt with the employment information reproduced in Exhibit A. Amended report

⁹ Compare original and amended 2025 year-end reports, each printed page 97, transaction 5909140. Reproductions appear in Exhibit E1 and E2. Original report, page 97; Amended report, page 97

descriptions in the Committee's receipt records, this payment supports the allegation that Respondents possessed substantive information about the contributor's work and omitted it from the challenged disclosure.¹⁰

The Shaheen Contributions Report also supplies more complete identification for three of these contributors. Kirstein is identified as OWNER at KIRSTEIN STRATEGIES in row 6737 and as CONSULTANT in rows 7800 and 8089, at the same mailing address. Gianotti is identified as CEO of THE WOODLAND GROUP in row 376, at the same address as the incomplete entries. Michelle Robbins appears as OWNER of B&B PRINTING COMPANY in row 7489, with a different Somersworth street address requiring identity confirmation.

These comparisons implicate the requirement to use contributor information already in the Committee's possession. Gianotti's original filing establishes possession before the challenged amendment. Kirstein's disclosed vendor payment and the more complete receipt entries provide further specific evidence. Complainant alleges that Respondents failed to disclose required identification available in their own records, in violation of § 30104(b)(3)(A) and its implementing regulations. The Commission should determine the full chronology, examine the basis for each amendment or omitted field, and establish whether the failures involved deliberate concealment.

C Category Two: Inaccurate Employment Disclosures Violations of FEC Law

(a) Six Contributors with Inaccurate Employment Disclosures

Steven Gordon presents a particularly direct conflict. Shaheen Contributions Report row 8046 identifies him as an ATTORNEY at SHAHEEN & GORDON. Row 5303, at the same Hopkinton address, instead reports NOT EMPLOYED in both fields. The latter entry is confirmed in the amended report for December 31, 2025, transaction 6125457, printed page 108. The firm's own profile describes Steven M. Gordon as a founder with an active trial practice, and its announcements identify him among its recognized attorneys in May 2025 and May 2026. The Committee therefore has a specific employment disclosure to explain against both its own record and the firm's contemporaneous professional record.¹¹

Charles A. Baker III is identified as PRINCIPAL at DEWEY SQUARE GROUP in row 8000 and as NOT EMPLOYED in both fields in row 6521, at the same Brookline address. Row 6521 matches the October 2, 2025 contribution, transaction 4843297, printed page 14 of both year-end reports. Dewey Square's own biography identifies Charlie Baker as its president and co-founder. The matching donor records and professional source support the allegation that the not-employed disclosure was inaccurate and may have concealed the contributor's institutional affiliation. The Commission should determine who supplied and approved that designation and what information Respondents possessed when filing it.¹²

¹⁰ Amended year-end report, Schedule B, printed page 463, October 21, 2025, transaction 500040989; Schedule A, printed page 156, transaction 6125462. The matching name, address, and professional descriptions support the relationship alleged on information and belief. [Fundraising consulting payment, page 463](#); [Kirstein receipt, page 156](#)

¹¹ See Shaheen Contributions Report rows 5303 and 8046 and the amended report. The firm profile and dated announcements support inquiry into identity, employment on the receipt date, and the Committee's actual knowledge. [Amended report](#) [Gordon firm profile](#) [May 2025 announcement](#) [May 2026 announcement](#)

¹² Dewey Square's biography and the same-address Committee entries support the alleged affiliation discrepancy. Both year-end reports list the October 2, 2025 contribution at printed page 14, transaction 4843297. [Dewey Square biography](#); [Amended report, page 14](#)

Elizabeth Stevens is reported as NOT EMPLOYED in both fields in fourteen Shaheen Contributions Report rows, listed in Exhibit B. Row 6157 matches the \$500 October 31, 2025 receipt identified in the amended report, transaction 5265566, printed page 388. Caplin & Drysdale identifies Elizabeth J. Stevens as a firm member and documents professional activity in 2025 and 2026. The Commission should confirm the donor's identity and status on the receipt dates, obtain the information supplied to Respondents, and determine whether repeated disclosures omitted known legal employment.¹³

Paul DiNino is reported as NOT EMPLOYED in both fields in rows 490 and 3417. Wellington Dupont identifies him as a senior advisor and founder and president of DiNino Associates, describes client representation, and places him in Chevy Chase, Maryland, matching the Shaheen Contributions Report. These records support the allegation that Respondents failed to disclose his professional affiliation. Obtain the initial solicitations, donor responses, follow-up requests, and Committee records to establish the failures to obtain, use, or report employer and occupation information under §§ 104.3 and 104.7 and whether the omissions concealed that affiliation.¹⁴

Mary Landrieu's entry, row 6729, reports employer NOT EMPLOYED and occupation SENIOR ADVISOR. Van Ness Feldman identifies Mary L. Landrieu as a senior policy advisor; its announcement of her arrival gives the same Thomas Jefferson Street NW address used in the Shaheen Contributions Report. The stated occupation and identical firm address support investigating whether Respondents omitted a known employer to conceal the donor's professional affiliation.¹⁵

Amy Gowder Graban's entry, row 446, identifies LOCKHEED MARTIN as employer and EXECUTIVE as occupation. GE Aerospace's 2025 annual report identifies Amy Gowder as Senior Vice President and CEO, Defense & Systems, and states that her Lockheed Martin service ended in 2020, followed by Aerojet Rocketdyne and GE. The documented career chronology supplies a concrete basis for alleging an obsolete employer disclosure and investigating possible concealment of the contributor's actual corporate affiliation. Obtain the donor's submission and the Committee's data history to confirm identity, establish when the correct employer was supplied, and identify who selected and approved the reported former employer.¹⁶

The allegations concern inaccurate required disclosures and possible concealment of donors' professional and institutional affiliations. The specific conflicts between Committee records and primary professional sources call for examination of the donor submissions, information available to Respondents, filing instructions, and amendment histories. Determine whether Respondents continued reporting contrary information after receiving or recording accurate identification and whether the repeated entries reflect a practice of obscuring those affiliations.

(b) Possible Prohibited Corporate Contribution Violations of FEC Law

Shaheen Contributions Report row 6826 identifies REAL ESTATE ADVISORS, 76 Exeter Road, Newmarket, New Hampshire, with a \$1,500 receipt. A City of Rochester abutter list dated May 17, 2024 identifies THE REAL ESTATE ADVISORS, INC at 76 Exeter Street, Newmarket. The

¹³ See Exhibit B, the amended report, and the firm's dated professional record. [Amended report Stevens firm profile](#)

¹⁴ Primary professional biography. [Paul DiNino](#)

¹⁵ The firm profile and May 26, 2015 announcement identify the professional relationship and business-address lead. [Landrieu profile Firm announcement](#)

¹⁶ GE Aerospace, 2025 Annual Report, Form 10-K printed page 74, PDF page 92, executive information as of January 29, 2026. [2025 Annual Report](#)

matching business name, street number, and town support the allegation that the reported payer is that corporation. Complainant alleges a possible prohibited corporate contribution and possible incorrect source identification. Trace the identified receipt to its Schedule A category, actual payer, and issuing account; resolve the Road/Street discrepancy and establish the entity's legal classification. Exhibit E7 reproduces the municipal record.

Direct contributions from corporate treasury funds to a federal candidate committee are prohibited by 52 U.S.C. § 30118(a) and 11 C.F.R. § 114.2(b). A candidate or political committee may not knowingly accept or receive a prohibited contribution. 11 C.F.R. § 114.2(d). In *FEC v. Beaumont*, 539 U.S. 146 (2003), the Supreme Court upheld the corporate contribution prohibition as applied to an advocacy corporation. Obtain the payment instrument, issuing account information, entity classification, source certification, attribution records, and Respondents' review under § 103.3(b). Determine whether Respondents knowingly accepted corporate funds, what the source documents disclosed, and whether the reported payer description obscured that source, and pursue the violations established.¹⁷

D Category Three: Circumstances Warranting Further Investigation by the FEC

(a) Employment Information in the Committee's Own Records

Exhibit C identifies twenty-nine exact name-and-address comparisons in which one entry reports NOT EMPLOYED in both fields and another supplies a named employer or self-employed professional work. This comparison is independent of an outside researcher's assumption about someone's occupation. It identifies information appearing within the Committee's own reported receipt records and provides a concrete starting point for applying § 104.7(b)(3).

The Commission should prioritize Steven Gordon and Charles Baker, addressed above, and the recurring variations for Mark M. Bodi and Andrea Durkin. Bodi appears as a marketing consultant for THE BODI GROUP or SELF EMPLOYED in rows 903, 2130, 2841, and 7872, while rows 3875 and 5732 report NOT EMPLOYED in both fields. Durkin appears as SELF EMPLOYED / MARKETING in six rows, while rows 6804 and 7079 report NOT EMPLOYED. The same-address matching and repeated variations call for comparison of actual receipt dates, donor responses, and database history.

(b) Required Collection and Correction Records

For the identified occupation defects and employment discrepancies, the Commission is requested to:

1. Obtain the initial solicitation and completed donor response, the dated stand-alone follow-up or written memorandum of an oral request, the donor's reply, and records establishing what information was available when each report was prepared.
2. Determine whether the Respondents requested the missing principal occupation, made the follow-up within 30 days, and retained evidence sufficient to support the best-efforts protection.

¹⁷ The corporate allegation concerns a direct candidate contribution and Respondents' knowing acceptance, under 52 U.S.C. § 30118(a) and 11 C.F.R. § 114.2(b), (d). The municipal source is the City of Rochester abutter list dated May 17, 2024, PDF page 6, map 223, lot 21-52; it uses Exeter Street. See Exhibit E7. Corporate contribution rule; Beaumont case summary; Rochester abutter list, page 6

3. Obtain the relevant fundraising database versions, donor correspondence, processor transmissions, and instructions to staff and vendors.
4. Identify exactly what donor information was delivered to the Committee and when for contributions routed through ActBlue or another intermediary.
5. Compare each original and amended Schedule A entry, any supplemental memo Schedule A, Form 99 submission, Request for Additional Information, and response.
6. Determine when accurate information first became available, which original or amended entries omitted it, and whether Respondents complied with the next applicable reporting deadline under § 104.7(b)(4). Examine the Gianotti amendment and Kirstein vendor-payment chronology first, then complete that chronology for each identified receipt, including the more complete Robbins entry.

(c) Additional Source and Classification Records

Elizabeth Q. Sanborn's rows 5051 and 5062 put SOFTWARE SALES [sic] in the employer field and SELF EMPLOYED in the occupation field. These entries appear to transpose an occupational description and employment status. The Commission should obtain the original responses and filing fields and determine whether the required identification was accurately reported. The recorded figures in column J exceed the individual-identification threshold.

PHILIPS COMMITTEE, row 2570, is recorded as an \$800 receipt at 6 Raven Lane, Sharon, Massachusetts. An official Braintree campaign-finance report identifies an Edward Ryan Philips Committee at 5 Raven Lane in the same town. The name and locality support an identity check, while the street-number difference remains unresolved. If the payer was a state political committee, determine the eligibility of the funds and the accounting required by 11 C.F.R. § 102.5(b)(1), if it was not a federal political committee. Exhibit E8 reproduces the local filing entry.¹⁸

(d) Responsibility and Possible Concealment

Complainant expressly alleges possible concealment, based on the removal of Gianotti's named employer and CEO occupation from the same transaction by amendment; the prior Kirstein fundraising-consulting payment at his reported business address; the recurring not-employed descriptions conflicting with other Committee entries; and the corroborating primary professional records. The Commission's 2024 initial-stage policy permits investigation of a credible allegation of a significant violation to determine its existence and exact scope. Obtain the source documents and audit histories, identify who entered, changed, reviewed, and approved these descriptions, and determine whether instructions or practices produced deliberate suppression of donor affiliations.¹⁹

If the records establish deliberate false identification, actual source concealment, knowing acceptance of corporate funds, or knowing and willful continuation of reporting violations, identify the responsible persons and pursue the additional violations and enhanced remedies the evidence

¹⁸ Official Braintree campaign-finance filing, PDF page 3, October 15, 2025 entry for Edward Ryan Philips Committee, 5 Raven Lane, Sharon, Massachusetts. The entry appears in a local committee's receipt schedule and is used to identify the Philips committee; it is a separate transaction from the \$800 Shaheen entry. Official local filing, page 3; Nonfederal organization accounting rule

¹⁹ Statement of Policy Regarding Commission Action in Matters at the Initial Stage in the Enforcement Process, 89 Fed. Reg. 19729–30 (March 20, 2024), effective April 19, 2024. A reason-to-believe finding initiates investigation or pre-probable-cause conciliation and is not a final liability determination. Current initial-stage policy

supports. The investigation should determine the scope of the alleged concealment, its duration, and every affected receipt and report.

III Prayers for Relief

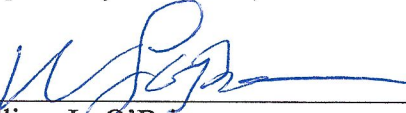
Federal disclosure law requires usable donor identification and a documented effort to obtain information that is genuinely missing. Its purpose is defeated when a campaign publishes nonresponsive descriptions while its records contain more complete answers. The deficiencies identified here are specific, traceable to reported entries, and capable of resolution through the Committee's own records. They warrant Commission action.

The Complainant therefore respectfully requests that the Commission:

1. Open a Matter Under Review, provide the required notice, and find reason to believe that Respondents violated 52 U.S.C. § 30104(b)(3)(A) and its implementing regulations through the deficient identification alleged above, subject to the statutory best-efforts protection.
2. Promptly investigate the identified disclosure failures, possible concealment of donor affiliations, and possible knowing acceptance of a prohibited corporate contribution under 52 U.S.C. § 30118(a) and 11 C.F.R. § 114.2(d), using compulsory process where authorized and necessary.
3. Obtain the donor responses, follow-up records, database histories, processor transmissions, payment instruments, report versions, and communications identified above, including the source and approval history for the Gianotti amendment; take testimony establishing what Respondents knew and when.
4. Promptly request preservation of relevant paper and electronic records, including source data and audit histories held by the Committee or its processors, fundraisers, and vendors, and enforce applicable retention obligations.
5. Identify every affected receipt and report, determine when accurate information became available, and secure complete corrective disclosures under 11 C.F.R. § 104.7(b)(4), with cross-references permitting the public to trace each correction.
6. Determine the actual source and classification of any prohibited contribution established, require the legally prescribed return of prohibited funds, and correct inaccurate source identification or attribution.
7. Determine whether the entries reflect a broader failure to collect, retain, use, or timely report donor information; investigate similarly affected transactions and additional responsible persons when supported by the evidence and required notice.
8. Impose the maximum civil penalties justified by the violations proved, including applicable enhanced penalties for knowing and willful conduct. Secure enforceable procedures, training, review of affected records, and appropriate independent compliance review and certifications to prevent recurrence.
9. If the Commission finds probable cause to believe a knowing and willful violation subject to 52 U.S.C. § 30109(d) occurred, refer the matter to the Attorney General of the United States under § 30109(a)(5)(C).

10. Grant other authorized relief through conciliation or judicial enforcement as necessary, proceeding promptly consistent with the Act's notice, voting, and confidentiality requirements.

Respectfully submitted,

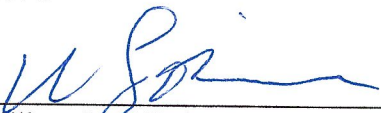

_____, 10-18-2026
William L. O'Brien
Complainant, appearing on his own behalf
Law Office of William L. O'Brien
1 Elm Street, Suite 201
Nashua, NH 03060

Verification of William L. O'Brien

State of New Hampshire
County of Killsborough

I, William L. O'Brien, being first duly sworn, state that I am the Complainant in this matter; that I have read the foregoing Complaint and its exhibits; and that the factual statements are true and correct to the best of my knowledge, information, and belief. My identity and address are stated from personal knowledge. Allegations concerning third parties, donor status, the source of funds, and internal Committee conduct are made on information and belief based on the records and sources identified. I do not claim personal knowledge of matters expressly identified as subjects for investigation.

I make this verification under penalty of perjury and subject to 18 U.S.C. § 1001 and 11 C.F.R. § 111.4.



William L. O'Brien
Date: 10-18-2026

Subscribed and sworn to before me by William L. O'Brien on this 18th day of October, 2026.

Arina Pocrass

Notary Public
My commission expires: 07/08/2031
[Notarial seal]

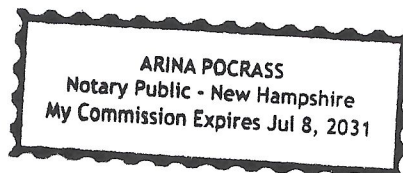


Exhibit A Apparent Occupation Disclosure Defects

Source: STEFANY SHAHEEN FOR CONGRESS.xlsx, worksheet Sheet 1 - schedule_a-2026-10-17. Excel row numbers include the title in row 1 and headings in row 2. G and H are employer and occupation. I is the receipt amount; J is the reported aggregate, not an additional receipt. The following transcriptions preserve the source spelling and capitalization. Bracketed [sic] identifies a misspelling in the source.

Row	Contributor	Employer G	Occupation H	Receipt I	Agg. J
5370	KIRSTEIN, HARRELL	KIRSTEIN STRATEGIES	SELF EMPLOYED	\$1,000	\$3,010
3695	GIANOTTI, STEPHEN A.	SELF EMPLOYED	SELF EMPLOYED	\$200	\$800
5826	GIANOTTI, STEPHEN A.	SELF EMPLOYED	SELF EMPLOYED	\$100	\$600
3350	ROBBINS, MICHELLE	B&B PRINTING	SELF EMPLOYED	\$100	\$350
1711	BUSH, DOUGLAS	DRB STRATEGIES LLC	CIVILIAN	\$500	\$500
1237	HOWELL, AMY	NCOC	NON PROFIT	\$500	\$500
6628	DAHER, CARLOS	DAHER MOTORS OF KINGDTON [sic]	SELF EMPLOYED	\$1,500	\$1,500
7014	MAVIGLIO, STEVE	FORZA COMMUNICATIONS	SELF EMPLOYED	\$2,000	\$2,000

More Complete Identification in the Same Shaheen Contributions Report

Row	Contributor	Employer G	Occupation H
6737	KIRSTEIN, HARRELL	KIRSTEIN STRATEGIES	OWNER
7800	KIRSTEIN, HARRELL	SELF EMPLOYED	CONSULTANT
8089	KIRSTEIN, HARRELL	SELF EMPLOYED	CONSULTANT
376	GIANOTTI, STEPHEN A.	THE WOODLAND GROUP	CEO
7489	ROBBINS, MICHELLE	B&B PRINTING COMPANY	OWNER

Kirstein and Gianotti have matching names and mailing addresses across the compared entries. Robbins's employer names closely match, but her street address differs. Receipt dates, accuracy at the relevant time, and any corrective filings must be established from the underlying reports and source records.

Exhibit B Specific Employment and Source Discrepancies

Source: STEFANY SHAHEEN FOR CONGRESS.xlsx, worksheet Sheet 1 - schedule_a-2026-10-17.

Receipt figures identify the records. They are not stated as unlawful amounts. Professional sources appear in the corresponding complaint footnotes.

Contributor and row numbers	Employer and occupation as recorded
GORDON, STEVEN 5303; 8046	5303: NOT EMPLOYED / NOT EMPLOYED; \$500. 8046: SHAHEEN & GORDON / ATTORNEY; \$1,000.
BAKER, CHARLES A III 6521; 8000	6521: NOT EMPLOYED / NOT EMPLOYED. 8000: DEWEY SQUARE GROUP / PRINCIPAL.
STEVENS, ELIZABETH 130, 947, 1828, 2540, 2573, 3119, 3947, 4588, 5060, 5544, 5998, 6015, 6157, 6346	All fourteen rows: NOT EMPLOYED / NOT EMPLOYED. Row 6157: \$500 receipt; reported aggregate \$1,600.
DININO, PAUL 490; 3417	Both rows: NOT EMPLOYED / NOT EMPLOYED; \$1,000 per row.
LANDRIEU, MARY 6729	NOT EMPLOYED / SENIOR ADVISOR; \$1,000.
GRABAN, AMY GOWDER 446	LOCKHEED MARTIN / EXECUTIVE; \$1,000.
REAL ESTATE ADVISORS 6826	76 EXETER RD, NEWMARKET, NH; \$1,500. Employer and occupation blank. Confirm receipt category and actual payer.
PHILIPS COMMITTEE 2570	6 RAVEN LN, SHARON, MA; \$800. Employer and occupation blank. Confirm identity, receipt category, and eligible source funds.
SANBORN, ELIZABETH Q 5051; 5062	SOFTWARE SALES [sic] / SELF EMPLOYED; each row \$100, reported aggregate \$275.

For the Gordon and Baker comparisons, the Shaheen Contributions Report supplies the same mailing address for each named donor's two descriptions. The fourteen Stevens entries use the same name and Washington address. A direct report match and the primary professional sources strengthen the specific inquiries described in the Complaint.

Exhibit C Matching Donors with Differing Employment Descriptions

Source: STEFANY SHAHEEN FOR CONGRESS.xlsx, worksheet Sheet 1 - schedule_a-2026-10-17. Each group below has an exact match on contributor name, both street-address fields, city, and state. One or more rows report NOT EMPLOYED in both employer and occupation, while other rows supply the professional description shown. The schedule identifies twenty-nine comparisons for receipt-date and information-possession review under § 104.7(b)(3). The Reported J column gives the lowest and highest reported aggregate among each group's listed rows; every listed value exceeds \$200. These are reported aggregates, not amounts to add together. The dated receipt and report history is to be correlated with the specific records identified here.

Contributor and locality	Recorded employer and occupation with Excel row numbers	Reported J
LYNCH, JOHN H. HOPKINTON, NH	NOT EMPLOYED / NOT EMPLOYED: rows 17. HARVARD / FACULTY: rows 7366.	\$3,500– \$7,000
STOKEL, DEBORAH PORTSMOUTH, NH	NOT EMPLOYED / NOT EMPLOYED: rows 44, 416, 581. SELF EMPLOYED / EDUCATIONAL CONSULTANT: rows 1320, 2296, 2876, 3626, 4282, 4872, 5381, 5801, 6184, 6524.	\$225–\$525
TAYLOR, SUE PLAISTOW, NH	NOT EMPLOYED / NOT EMPLOYED: rows 3846, 3883, 4587, 4687, 4688, 4719, 4948. KPREPO / NURSE: rows 63, 945, 1086, 1623, 1826, 2114, 2530, 2664, 2820, 2827, 3000, 3012, 3235.	\$243–\$418
CRESTA, JAMES PORTSMOUTH, NH	NOT EMPLOYED / NOT EMPLOYED: rows 166, 799, 1013. FEDERAL GOVT / BUS MANAGER: rows 2129, 2407, 2567.	\$300–\$600
BOYD, VICKI PORTSMOUTH, NH	NOT EMPLOYED / NOT EMPLOYED: rows 168, 975, 1933, 2569, 3134, 3963, 4606, 4903, 5082, 5604, 6014, 6353, 6915, 7193, 7382. HEINEMANN / PRESIDENT: rows 7943, 8103.	\$1,050– \$3,750
DUKES, LARRY RYE, NH	NOT EMPLOYED / NOT EMPLOYED: rows 1902, 1993, 2553, 2671, 3125. SELF EMPLOYED / CONTRACTOR: rows 272, 959, 1033.	\$350–\$425
SCHWARTZ, MIMI BETHESDA, MD	NOT EMPLOYED / NOT EMPLOYED: rows 7188. LIFEPOSSIBILITIES / BUSINESS COACH: rows 467, 1152, 2150, 2828, 3311, 4180, 4751, 5215, 5741, 6153.	\$1,000– \$1,250
LAZEROWICH, HOWARD J. RYE BEACH, NH	NOT EMPLOYED / NOT EMPLOYED: rows 521. SELF EMPLOYED / HOTEL OWNER: rows 2582.	\$250–\$500
DURKIN, ANDREA GREENVILLE, SC	NOT EMPLOYED / NOT EMPLOYED: rows 6804, 7079. SELF EMPLOYED / MARKETING: rows 535, 2806, 3654, 4979, 5808, 8096.	\$250–\$725
MARSHALL, ARIEL WASHINGTON, DC	NOT EMPLOYED / NOT EMPLOYED: rows 7758. U.S. SENATE / POLICY ANALYST: rows 566, 3712.	\$250–\$600
MARCINKEVICH, VICKI MANCHESTER, NH	NOT EMPLOYED / NOT EMPLOYED: rows 1808, 2666, 3302. TEAM NISSAN INC. / AUTO DEALER: rows 851, 1000.	\$800–\$950
BRIGGS, MARY NEW CASTLE, NH	NOT EMPLOYED / NOT EMPLOYED: rows 2568. SELF EMPLOYED / PHYSICAL THERAPIST: rows 893.	\$225–\$275

Contributor and locality	Recorded employer and occupation with Excel row numbers	Reported J
BODI, MARK M. PORTSMOUTH, NH	NOT EMPLOYED / NOT EMPLOYED: rows 3875, 5732. SELF EMPLOYED / MARKETING CONSULTANT: rows 2130, 2841. THE BODI GROUP / MARKETING CONSULTANT: rows 903, 7872.	\$250–\$750
REILLY, JOSEPH DELRAY BEACH, FL	NOT EMPLOYED / NOT EMPLOYED: rows 1206. BANKPROV / BANKER: rows 6515.	\$1,000– \$1,100
WEST, DIANA DANVILLE, NH	NOT EMPLOYED / NOT EMPLOYED: rows 1284, 2286, 2861. BOSTON MEDICAL CENTER / NURSING: rows 3488, 4092, 4859, 5714, 6171.	\$210–\$390
YORK, MICHAEL C GOFFSTOWN, NH	NOT EMPLOYED / NOT EMPLOYED: rows 1298, 2295. STATE OF NEW HAMPSHIRE / LIBRARIAN: rows 7393.	\$250–\$450
CIOLFI, MONICA A CONCORD, NH	NOT EMPLOYED / NOT EMPLOYED: rows 1551. THE FEDCAP GROUP / ATTORNEY: rows 6849.	\$250–\$500
SHERMAN, THOMAS M. RYE, NH	NOT EMPLOYED / NOT EMPLOYED: rows 7227, 7229, 7266. VYTATEK / CMO: rows 1559, 3215, 5345.	\$3,578– \$6,578
TRUDEAU, ELIZABETH PORTSMOUTH, NH	NOT EMPLOYED / NOT EMPLOYED: rows 6545. BUSH INSTITUTE / MANAGING DIRECTOR: rows 1802.	\$250–\$400
FOLEY, MARY CAREY PORTSMOUTH, NH	NOT EMPLOYED / NOT EMPLOYED: rows 6934, 7128, 7290, 7403. OCEAN PROPERTIES / CONCIERGE: rows 2006, 2068, 2646, 2893, 3638, 3983, 4130, 4145, 4375, 4603, 4881, 5045, 5737, 6445.	\$350–\$975
LENCKI, DONNA K DEERFIELD, NH	NOT EMPLOYED / NOT EMPLOYED: rows 5289. OLD FIELD VENTURES / HEALTHCARE: rows 2562.	\$7,000
SWEET, BARBARA K NEW CASTLE, NH	NOT EMPLOYED / NOT EMPLOYED: rows 2729, 3129. SELF EMPLOYED / DIRECTOR: rows 4134.	\$2,100– \$7,000
WHITE, WILLIAM MILTON, MA	NOT EMPLOYED / NOT EMPLOYED: rows 3010. DEME OFFSHORE US / PRESIDENT: rows 5924.	\$250–\$500
MORALES, KRISTIN PORTSMOUTH, NH	NOT EMPLOYED / NOT EMPLOYED: rows 6745, 8075. SELF EMPLOYED / STRATEGY CONSULTANT: rows 4961.	\$500–\$1,250
GORDON, STEVEN HOPKINTON, NH	NOT EMPLOYED / NOT EMPLOYED: rows 5303. SHAHEEN & GORDON / ATTORNEY: rows 8046.	\$1,000– \$1,500
MOSES, ALAN PORTSMOUTH, NH	NOT EMPLOYED / NOT EMPLOYED: rows 5647. SELF EMPLOYED / CONSULTANT: rows 8088.	\$250–\$1,250
KNUDSEN, MILLI HENNIKER, NH	NOT EMPLOYED / NOT EMPLOYED: rows 5891. OCME / EVIDENCE TECHNICIAN: rows 7414.	\$250–\$300
BAKER, CHARLES A III BROOKLINE, MA	NOT EMPLOYED / NOT EMPLOYED: rows 6521. DEWEY SQUARE GROUP / PRINCIPAL: rows 8000.	\$3,500– \$7,000
MANATOS, ANASTASIOS BETHESDA, MD	NOT EMPLOYED / NOT EMPLOYED: rows 7124. BLOCK INC. / HEAD OF AMERICAS POLICY: rows 8018.	\$250–\$1,250

Exhibit D Filing Records and Chronology

The original 2025 year-end report was filed January 31, 2026; the amendment was filed April 17, 2026. Both cover October 1–December 31, 2025. The following five receipt matches identify the donor, date, transaction, and printed page in each version. Gianotti’s employer and occupation were replaced by amendment; the other four listed entries retain the challenged descriptions in these two versions.

Contributor	Receipt date	Transaction ID	Original p.	Amended p.
Charles A. Baker III	Oct. 2, 2025	4843297	14	14
Elizabeth Stevens	Oct. 31, 2025	5265566	388	388
Stephen A. Gianotti	Nov. 24, 2025	5909140	97	97
Harrell Kirstein	Dec. 29, 2025	6125462	155	156
Steven Gordon	Dec. 31, 2025	6125457	108	108

The original and amended report links identify the complete filings. Exhibit E reproduces the Gianotti comparison and selected other supporting pages. The October 21, 2025 \$21,000 Kirstein Strategies LLC fundraising-consulting payment appears at printed page 463 of the amended report, transaction 500040989, before the December 29 receipt with the incomplete occupation.²⁰

Supporting Professional and Source Records

Shaheen & Gordon’s Steven M. Gordon profile and May 2025 and May 2026 attorney announcements; see the Gordon footnote in Category Two.

Dewey Square Group’s Charlie Baker profile; see the Baker footnote in Category Two.

Caplin & Drysdale’s Elizabeth J. Stevens profile, including dated professional activity in 2025 and 2026; see the Stevens footnote in Category Two.

Wellington Dupont’s Paul DiNino biography; Van Ness Feldman’s Mary L. Landrieu profile and firm announcement; GE Aerospace’s 2025 Annual Report, Form 10-K printed page 74; see the corresponding Category Two footnotes.

City of Rochester abutter list dated May 17, 2024, PDF page 6, map 223, lot 21-52: THE REAL ESTATE ADVISORS, INC, 76 Exeter Street, Newmarket. See the corporate-source footnote and Exhibit E7. The Shaheen Contributions Report uses Exeter Road.

Braintree campaign-finance filing, PDF page 3, October 15, 2025 entry identifying Edward Ryan Philips Committee at 5 Raven Lane, Sharon. See the Category Three footnote and Exhibit E8. The Shaheen Contributions Report uses 6 Raven Lane for its separate \$800 receipt.

²⁰ Official FEC document links. [Amended year-end report](#) [Original year-end report](#)

Exhibit E1 Gianotti Original Disclosure

Original year-end report filed January 31, 2026, printed page 97. November 24, 2025, transaction 5909140: THE WOODLAND GROUP / CEO.

Official source record

Image# 202601319825635888

SCHEDULE A (FEC Form 3) ITEMIZED RECEIPTS

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER: PAGE 97 OF 482
(check only one)
☒ 11a ☐ 11b ☐ 11c ☐ 11d
☐ 12 ☐ 13a ☐ 13b ☐ 14 ☐ 15

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NAME OF COMMITTEE (In Full) Stefany Shaheen for Congress	
Full Name (Last, First, Middle Initial) Gallagher, Christopher, , ,	
Mailing Address 16 Primrose St	
City Chevy Chase	State MD
Zip Code 20815-4229	Date of Receipt M M / D D / Y Y Y Y Y 11 / 20 / 2025
Transaction ID : 5691325	
FEC ID number of contributing federal political committee. C	Amount of Each Receipt this Period 1000.00
Name of Employer Not Employed	Occupation Not Employed
Receipt For: 2026 ☒ Primary ☐ General ☐ Other (specify) ▼	Election Cycle-to-Date 1000.00
Memo Item	
Full Name (Last, First, Middle Initial) Gianotti, Stephen, A., ,	
Mailing Address 34 Woodland Rd	
City North Hampton	State NH
Zip Code 03862-2331	Date of Receipt M M / D D / Y Y Y Y Y 11 / 24 / 2025
Transaction ID : 5909140	
FEC ID number of contributing federal political committee. C	Amount of Each Receipt this Period 100.00
Name of Employer The Woodland Group	Occupation CEO
Receipt For: 2026 ☒ Primary ☐ General ☐ Other (specify) ▼	Election Cycle-to-Date 600.00
Memo Item	
* Earmarked Contribution: See Below	
Full Name (Last, First, Middle Initial) ACTBLUE	
Mailing Address PO Box 441146	
City West Somerville	State MA
Zip Code 02144-0031	Date of Receipt M M / D D / Y Y Y Y Y 11 / 30 / 2025
Transaction ID : 5909140E	
FEC ID number of contributing federal political committee. C C00401224	Amount of Each Receipt this Period 100.00
Name of Employer	Occupation Conduit total listed in Agg. field
Receipt For: 2026 ☒ Primary ☐ General ☐ Other (specify) ▼	Election Cycle-to-Date 317213.33
Memo Item	
Note: Above Contribution earmarked through this organization.	
SUBTOTAL of Receipts This Page (optional) ▶ 1100.00	
TOTAL This Period (last page this line number only) ▶	

FEC Schedule A (Form 3) (Revised 05/2016)

Exhibit E2 Gianotti Amended Disclosure

Amended year-end report filed April 17, 2026, printed page 97. The same transaction 5909140 is reported as SELF EMPLOYED / SELF EMPLOYED.

Official source record

Image# 202604179863160940

SCHEDULE A (FEC Form 3) ITEMIZED RECEIPTS

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER:
(check only one)

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☐ 12 ☐ 13a ☐ 13b ☐ 14 ☐ 15

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NAME OF COMMITTEE (In Full)

Stefany Shaheen for Congress

Full Name (Last, First, Middle Initial)

Gallagher, Christopher, , ,

A.

Mailing Address 16 Primrose St

City

Chevy Chase

State

MD

Zip Code

20815-4229

Date of Receipt

MM / DD / YYYY
11 / 20 / 2025

Transaction ID : 5691325

FEC ID number of contributing
federal political committee.

C

Amount of Each Receipt this Period

1000.00

Name of Employer

Not Employed

Occupation

Not Employed

Receipt For: 2026

☒ Primary ☐ General
☐ Other (specify) ▼

Election Cycle-to-Date ▼

1000.00

☐ Memo Item

Full Name (Last, First, Middle Initial)

Gianotti, Stephen, A., ,

B.

Mailing Address 34 Woodland Rd

City

North Hampton

State

NH

Zip Code

03862-2331

Date of Receipt

MM / DD / YYYY
11 / 24 / 2025

Transaction ID : 5909140

FEC ID number of contributing
federal political committee.

C

Amount of Each Receipt this Period

100.00

Name of Employer

Self Employed

Occupation

Self Employed

Receipt For: 2026

☒ Primary ☐ General
☐ Other (specify) ▼

Election Cycle-to-Date ▼

600.00

☐ Memo Item

* Earmarked Contribution: See Below

Full Name (Last, First, Middle Initial)

ACTBLUE

C.

Mailing Address PO Box 441146

City

West Somerville

State

MA

Zip Code

02144-0031

Date of Receipt

MM / DD / YYYY
11 / 30 / 2025

Transaction ID : 5909140E

FEC ID number of contributing
federal political committee.

C C00401224

Amount of Each Receipt this Period

100.00

Name of Employer

Occupation

Conduit total listed in Agg. field

Receipt For: 2026

☒ Primary ☐ General
☐ Other (specify) ▼

Election Cycle-to-Date ▼

317213.33

☒ Memo Item

Note: Above Contribution earmarked through this organization.

SUBTOTAL of Receipts This Page (optional)..... ▶

1100.00

TOTAL This Period (last page this line number only)..... ▶

FEC Schedule A (Form 3) (Revised 05/2016)

Exhibit E3 Kirstein Fundraising Consulting Payment

Amended year-end report, printed page 463. October 21, 2025 payment of \$21,000 to KIRSTEIN STRATEGIES LLC for FUNDRAISING CONSULTING, transaction 500040989.

Official source record

Image# 202604179863161306

SCHEDULE B (FEC Form 3) ITEMIZED DISBURSEMENTS

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER:
(check only one)

☒ 17 ☐ 18 ☐ 19a ☐ 19b
☐ 20a ☐ 20b ☐ 20c ☐ 21

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NAME OF COMMITTEE (In Full)

Stefany Shaheen for Congress

Full Name (Last, First, Middle Initial)

A. Intuit

Mailing Address 2700 Coast Ave

City
Mountain View

State
CA

Zip Code
94043-1140

Purpose of Disbursement
Software

Candidate Name

Office Sought:

☐ House
☐ Senate
☐ President

Disbursement For: 2026

☒ Primary ☐ General
☐ Other (specify) ▼

State:

District:

Date of Disbursement

M M / D D / Y Y Y Y Y
12 / 04 / 2025

FEC Identification Number

C

Amount of Each Disbursement this Period

68.90

Transaction ID : 500048719

☐ Memo Item

Full Name (Last, First, Middle Initial)

B. Kirstein Strategies LLC

Mailing Address 1242 Half St SW

City
Washington

State
DC

Zip Code
20024-4110

Purpose of Disbursement
Fundraising Consulting

Candidate Name

Office Sought:

☐ House
☐ Senate
☐ President

Disbursement For: 2026

☒ Primary ☐ General
☐ Other (specify) ▼

State:

District:

Date of Disbursement

M M / D D / Y Y Y Y Y
10 / 21 / 2025

FEC Identification Number

C

Amount of Each Disbursement this Period

21000.00

Transaction ID : 500040989

☐ Memo Item

Full Name (Last, First, Middle Initial)

C. Kirstein Strategies LLC

Mailing Address 1242 Half St SW

City
Washington

State
DC

Zip Code
20024-4110

Purpose of Disbursement
Reimbursement - See Below

Candidate Name

Office Sought:

☐ House
☐ Senate
☐ President

Disbursement For: 2026

☒ Primary ☐ General
☐ Other (specify) ▼

State:

District:

Date of Disbursement

M M / D D / Y Y Y Y Y
10 / 21 / 2025

FEC Identification Number

C

Amount of Each Disbursement this Period

22011.31

Transaction ID : 500040990

☐ Memo Item

SUBTOTAL of Disbursements This Page (optional).....

43080.21

TOTAL This Period (last page this line number only).....

FEC Schedule B (Form 3) (Revised 05/2016)

Exhibit E4 Kirstein Incomplete Occupation

Amended year-end report, printed page 156. December 29, 2025 contribution, transaction 6125462, at the matching address: KIRSTEIN STRATEGIES / SELF EMPLOYED.

Official source record

Image# 202604179863160999

SCHEDULE A (FEC Form 3) ITEMIZED RECEIPTS

Use separate schedule(s)
for each category of the
Detailed Summary Page

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(check only one)

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☐ 12 ☐ 13a ☐ 13b ☐ 14 ☐ 15

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NAME OF COMMITTEE (In Full)

Stefany Shaheen for Congress

Full Name (Last, First, Middle Initial)

Kirstein, Harrell, , ,

A.

Mailing Address 1242 Half St SW

City
Washington

State
DC

Zip Code
20024-4110

Date of Receipt

M M / D D / Y Y Y Y
12 / 29 / 2025

Transaction ID : 6125462

FEC ID number of contributing
federal political committee.

C

Amount of Each Receipt this Period

1000.00

Name of Employer

Kirstein Strategies

Occupation

Self Employed

Receipt For: 2026

☒ Primary ☐ General
☐ Other (specify) ▼

Election Cycle-to-Date ▼

3010.00

☐ Memo Item

* Earmarked Contribution: See Below

Full Name (Last, First, Middle Initial)

ACTBLUE

B.

Mailing Address PO Box 441146

City
West Somerville

State
MA

Zip Code
02144-0031

Date of Receipt

M M / D D / Y Y Y Y
12 / 31 / 2025

Transaction ID : 6125462E

FEC ID number of contributing
federal political committee.

C C00401224

Amount of Each Receipt this Period

1000.00

Name of Employer

Occupation

Conduit total listed in Agg. field

Receipt For: 2026

☒ Primary ☐ General
☐ Other (specify) ▼

Election Cycle-to-Date ▼

317213.33

☒ Memo Item

Note: Above Contribution earmarked through this organization.

Full Name (Last, First, Middle Initial)

Klein, Benjamin, , ,

C.

Mailing Address 1401 Kenwood Ave

City
Alexandria

State
VA

Zip Code
22302-2315

Date of Receipt

M M / D D / Y Y Y Y
12 / 18 / 2025

Transaction ID : 6035945

FEC ID number of contributing
federal political committee.

C

Amount of Each Receipt this Period

500.00

Name of Employer
Red+Blue Strategies

Occupation

Government Relations

Receipt For: 2026

☒ Primary ☐ General
☐ Other (specify) ▼

Election Cycle-to-Date ▼

500.00

☐ Memo Item

* Earmarked Contribution: See Below

SUBTOTAL of Receipts This Page (optional)..... ▶

1500.00

TOTAL This Period (last page this line number only)..... ▶

FEC Schedule A (Form 3) (Revised 05/2016)

Exhibit E5 Gordon Employment Disclosure

Amended year-end report, printed page 108. December 31, 2025 contribution, transaction 6125457: NOT EMPLOYED / NOT EMPLOYED.

Official source record

Image# 202604179863160951

SCHEDULE A (FEC Form 3) ITEMIZED RECEIPTS

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER:
(check only one)

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☐ 12 ☐ 13a ☐ 13b ☐ 14 ☐ 15

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NAME OF COMMITTEE (In Full)

Stefany Shaheen for Congress

Full Name (Last, First, Middle Initial)

Goodwin, Bruce, E.,

A.

Mailing Address 87 Mason Ave

City

Portsmouth

State

NH

Zip Code

03801-4741

Date of Receipt

M M / D D / Y Y Y Y
12 / 04 / 2025

Transaction ID : 5858321

FEC ID number of contributing
federal political committee.

C

Amount of Each Receipt this Period

50.00

Name of Employer

Not Employed

Occupation

Not Employed

Receipt For: 2026

☒ Primary ☐ General
☐ Other (specify) ▼

Election Cycle-to-Date ▼

350.00

☐ Memo Item

* Earmarked Contribution: See Below

Full Name (Last, First, Middle Initial)

ACTBLUE

B.

Mailing Address PO Box 441146

City

West Somerville

State

MA

Zip Code

02144-0031

Date of Receipt

M M / D D / Y Y Y Y
12 / 07 / 2025

Transaction ID : 5858321E

FEC ID number of contributing
federal political committee.

C C00401224

Amount of Each Receipt this Period

50.00

Name of Employer

Not Employed

Occupation

Conduit total listed in Agg. field

Receipt For: 2026

☒ Primary ☐ General
☐ Other (specify) ▼

Election Cycle-to-Date ▼

317213.33

☒ Memo Item

Note: Above Contribution earmarked through this organization.

Full Name (Last, First, Middle Initial)

Gordon, Steven, , ,

C.

Mailing Address 247 Rollins Rd

City

Hopkinton

State

NH

Zip Code

03229-2663

Date of Receipt

M M / D D / Y Y Y Y
12 / 31 / 2025

Transaction ID : 6125457

FEC ID number of contributing
federal political committee.

C

Amount of Each Receipt this Period

500.00

Name of Employer

Not Employed

Occupation

Not Employed

Receipt For: 2026

☒ Primary ☐ General
☐ Other (specify) ▼

Election Cycle-to-Date ▼

1500.00

☐ Memo Item

* Earmarked Contribution: See Below

SUBTOTAL of Receipts This Page (optional)..... ▶

550.00

TOTAL This Period (last page this line number only)..... ▶

FEC Schedule A (Form 3) (Revised 05/2016)

Exhibit E6 Stevens Employment Disclosure

Amended year-end report, printed page 388. October 31, 2025 contribution, transaction 5265566: NOT EMPLOYED / NOT EMPLOYED.

Official source record

Image# 202604179863161231

SCHEDULE A (FEC Form 3) ITEMIZED RECEIPTS

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER:
(check only one)

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☒ 11a ☐ 11b ☐ 11c ☐ 11d
☐ 12 ☐ 13a ☐ 13b ☐ 14 ☐ 15

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NAME OF COMMITTEE (In Full)

Stefany Shaheen for Congress

Full Name (Last, First, Middle Initial)

ACTBLUE

A.

Mailing Address PO Box 441146

City

West Somerville

State

MA

Zip Code

02144-0031

FEC ID number of contributing
federal political committee.

C C00401224

Name of Employer

Occupation
Conduit total listed in Agg. field

Receipt For: 2026

☒ Primary ☐ General
☐ Other (specify) ▼

Election Cycle-to-Date ▼

317213.33

Date of Receipt

MM / DD / YYYY
10 / 19 / 2025

Transaction ID : 5069790E

Amount of Each Receipt this Period

100.00

☒ Memo Item

Note: Above Contribution earmarked through this organization.

Full Name (Last, First, Middle Initial)

Stevens, Elizabeth, , ,

B.

Mailing Address 3050 Avon Ln NW

City

Washington

State

DC

Zip Code

20007-2908

FEC ID number of contributing
federal political committee.

C

Name of Employer

Not Employed

Occupation
Not Employed

Receipt For: 2026

☒ Primary ☐ General
☐ Other (specify) ▼

Election Cycle-to-Date ▼

1600.00

Date of Receipt

MM / DD / YYYY
10 / 31 / 2025

Transaction ID : 5265566

Amount of Each Receipt this Period

500.00

☐ Memo Item

* Earmarked Contribution: See Below

Full Name (Last, First, Middle Initial)

ACTBLUE

C.

Mailing Address PO Box 441146

City

West Somerville

State

MA

Zip Code

02144-0031

FEC ID number of contributing
federal political committee.

C C00401224

Name of Employer

Occupation
Conduit total listed in Agg. field

Receipt For: 2026

☒ Primary ☐ General
☐ Other (specify) ▼

Election Cycle-to-Date ▼

317213.33

Date of Receipt

MM / DD / YYYY
11 / 02 / 2025

Transaction ID : 5265566E

Amount of Each Receipt this Period

500.00

☒ Memo Item

Note: Above Contribution earmarked through this organization.

SUBTOTAL of Receipts This Page (optional)..... ▶

500.00

TOTAL This Period (last page this line number only)..... ▶

FEC Schedule A (Form 3) (Revised 05/2016)

Exhibit E7 Corporate Identity Record

City of Rochester abutter list dated May 17, 2024, PDF page 6. Map 223, lot 21-52 identifies THE REAL ESTATE ADVISORS, INC at 76 EXETER STREET, NEWMARKET, NH 03857.

Official source record

ABUTTER LIST

City of Rochester, NH
Please Print or Type

Applicant: ALFRED & CYNTHIA BENTON **Phone** _____

Project Address: 585 & 859 PORTLAND STREET

List the names and addresses of all parties below. For abutting lot owners, list each owner whose lot adjoins or is directly across the street or a body of water from the subject property. This form may not be completed more than five (5) days prior to the application deadline.

LEGAL OWNER OF SUBJECT LOT

Map	Lot	Zone	Owner Name	Mailing Address
11	81	R1	ALFRED & CYNTHIA BENTON	585 PORTLAND STREET, ROCHESTER, NH 03867

ABUTTING LOT OWNERS

Map	Lot	Owner Name	Owner Mailing Address (NOT property location)
223	25	ALFRED & CYNTHIA BENTON	585 PORTLAND STREET, ROCHESTER, NH 03867
223	24	THE METAYER FAMILY REVOCABLE TRUST	21 JEREMIAH LANE, ROCHESTER, NH 03867-2429
223	21-52	THE REAL ESTATE ADVISORS, INC	76 EXETER STREET, NEWMARKET, NH 03857
111	82	JAMES A. & JANE BENTON	579 PORTLAND STREET, ROCHESTER, NH 03867-2429
111	78	DOROTHY RADWAN	584 PORTLAND STREET, ROCHESTER, NH 03867-2428
111	79	DANIEL KEITH & LISA MARIE ROMANOVITZ	590 PORTLAND STREET, ROCHESTER, NH 03867-2428
111	80	HELEN P. LEMIEUX	596 PORTLAND STREET, ROCHESTER, NH 03867-2428
223	19	TROY DILLOW	PO BOX 1464, ROCHESTER, NH 03866

PROFESSIONALS AND EASEMENT HOLDERS. Engineers, Surveyors, Soil Scientists, and Architects whose seal appears or will appear on the plans (other than any agent submitting this application); holders of conservation, preservation, or agricultural easements; and upstream dam owners/NHDES.

Name of Professional or Easement Holder	Mailing Address
RANDOLPH R. TETREAU, NH LLS 729	C/O NORMAY PLAINS ASSOCIATES, INC.
	PO BOX 249, ROCHESTER, NH 03866

I, the undersigned, acknowledge that it is the responsibility of the applicant or his/her agent to fill out this form. I understand that any error or omission could affect the validity of any approval. To get the names & addresses of all abutters please see the Planning Department Secretary.

on this date: MAY 17, 2024 This is page 1 of 1 pages.

Applicant or Agent: ASHLEY F. ROWE

Planning Staff Verification: _____ **Date:** _____

N:\plan\Forms\Miscellaneous\Abutter list.doc (updated 3/31/2023)

Exhibit E8 Philips Committee Identity Record

Official Braintree campaign-finance filing, PDF page 3. Its October 15, 2025 receipt entry identifies Edward Ryan Philips Committee at 5 Raven Lane, Sharon, Massachusetts. This identifies the committee in a separate local transaction.

Official source record

10/1/2025	Costello, Michael One State Street, Suite 1500 Boston, MA 02109	\$200.00 Attorney Smith, Costello & Crawford
10/17/2025	Cronin, Joseph 16 Rivers Edge Place Methuen, MA 01844	\$100.00 CEO St. Ann's Home & School
10/8/2025	Culhane, Michael 2 Wilson Rd Bedford, MA 01730	\$200.00 Admin James F Farr Academy Inc
10/15/2025	Daiute, Barbara 15 Birdsong Plymouth, MA 02345	\$1,000.00 Retired Retired
8/25/2025	Daiute, James 633 Pond Street Braintree, MA 02184	\$100.00
10/15/2025	Daiute, Michael 66 Wayne Ave Braintree, MA 02184	\$100.00
10/15/2025	Demmerly, Jessica 25 Teaberry Lane Braintree, MA 02184-3618	\$75.00 Attorney Rubin Rudman
9/18/2025	Domoretsky, Brian 23 Winthrop St Stoneham, MA 02180	\$200.00 Public Affairs Benchmark Strategies
9/11/2025	Downey, Michael 40 heritage hill Dedham, MA 02026	\$50.00 CFO New England Center for Children
10/15/2025	Edward Ryan Philips Committee 5 Raven Lane Sharon, MA 02067	\$100.00 16592
10/3/2025	Fallon, Margery 3 Webster Reach Plymouth, MA 02360	\$25.00 Not Employed Not Employed
10/4/2025	Greene, Stephen 99 Peach Street Braintree, MA 02184	\$100.00 Financial Advisor J.P. Morgan
10/14/2025	Greineder, Kurt 122 King Philip Street Weymouth, MA 02190	\$25.00 Staff Analyst Commonwealth of Massachusetts
10/14/2025	Haigh, Caroline 170 High St Norwell, MA 02061	\$25.00 Not Employed Not Employed
9/11/2025	Harding, John 199 lake st. Unit-27 Weymouth, MA 02189	\$100.00 Not Employed Not Employed
9/9/2025	Hartman, Shawn 82 Stoney Mountain Road Mathias, WV 26812	\$250.00 Senior Vice President Academic Search
10/3/2025	Horak, Rachel 7 Burton Rd Braintree, MA 02184	\$25.00 Program Officer American Society for Microbiology

Exhibit E9 Professional Source Extracts

Selected short extracts from the primary professional records cited in the Complaint. Sources reviewed October 17, 2026. Each extract identifies the specific professional affiliation supporting the corresponding allegation.

Steven M. Gordon

Shaheen & Gordon identifies Gordon as Senior Counsel and a firm founder. Its biography describes an “active and extensive trial practice.”

Primary professional record

Charlie Baker

Dewey Square Group identifies Charlie Baker as “President and Co-founder.”

Primary professional record

Elizabeth J. Stevens

Caplin & Drysdale states: “Elizabeth Stevens is a Member of the Firm.” The profile lists dated professional activity in 2025 and 2026.

Primary professional record

Paul DiNino

Wellington Dupont identifies DiNino as a senior advisor and describes him as “the Founder and President of DiNino Associates.”

Primary professional record

Mary L. Landrieu

Van Ness Feldman identifies Landrieu as “Senior Policy Advisor.” Its May 26, 2015 arrival announcement identifies the same Washington business address used in the receipt extract.

Primary professional record

Amy Gowder

GE Aerospace’s 2025 Annual Report, Form 10-K printed page 74, identifies Gowder’s executive role as of January 29, 2026. Its career chronology places her Lockheed Martin service through 2020, Aerojet Rocketdyne service beginning in 2020, and GE service beginning in April 2022.

Primary professional record

Exhibit F Accompanying Electronic Workbook

Electronic Exhibit F is supplied as the separate, unchanged Excel file “STEFANY SHAHEEN FOR CONGRESS.xlsx.” It is not reproduced as thousands of printed rows. The filing package should retain that workbook with this Complaint and its attached Exhibits A–E.

Worksheet: Sheet 1 - schedule_a-2026-10-17. Row 1: schedule_a-2026-10-17T00_19_31. Row 2: column headings. Rows 3–8112: 8,110 receipt records. The complaint’s Excel row references refer to this exact workbook, including the title and heading rows.

Columns A–F identify the contributor and reported mailing address; G identifies employer; H identifies occupation; I is the receipt amount; J is the reported aggregate; K identifies a donor committee where supplied. The reported aggregates are not additional receipt amounts.

SHA-256 of the accompanying workbook:

3056ebb5a74a5c949e3af45298ee8a956000557784b6d4c4c4ae8aec49dbfaa1

A filename without spaces is also supplied for download as

STEFANY_SHAHEEN_FOR_CONGRESS.xlsx; its bytes and SHA-256 are identical to the workbook identified above.