

## COMPLAINT RECEIVED

The Enforcement Division of the Fair Political Practices Commission received the enclosed complaint, COM-02192026-00483, on 2/19/2026 11:20:00 AM. The information filed in the complaint is below and any attachments filed will be included.

The following individuals are the named parties in this complaint:

Sara Konsavage  
Complainant

Mike McGuire  
Respondent

MIKE MCGUIRE FOR INSURANCE COMMISSIONER 2026  
Respondent

PROGRESS FOR CALIFORNIA, SENATOR MIKE MCGUIRE BALLOT MEASURE  
COMMITTEE  
Respondent

The Violations alleged are:

Violation of Rules Regarding Contributions  
Misuse of Ballot Measure Funds (18521.5)  
Please see attached.

Statement of Intention to be a Candidate (85200)  
Please see attached.

Campaign Bank Account (85201)  
Please see attached.

Campaign Reporting Inaccurate/Incomplete  
Campaign Form Incomplete or Inaccurate (84211)  
Please see attached.

Improper Use of Campaign Funds  
Please see attached.

Kendall Bonebrake  
Chief, Enforcement Division  
California Fair Political Practices Commission  
1102 Q Street, Suite 3050  
Sacramento, CA 95811

### INTRODUCTION

My name is Sara Konsavage, and I am filing this complaint against Senator Mike McGuire and two of his committees, [Mike McGuire for Insurance Commissioner 2026](#) (FPPC ID: 1456532) and [Progress for California](#) (FPPC ID: 1461632). This complaint alleges that Senator McGuire and his committees violated the Political Reform Act and FPPC Regulations by using Insurance Commissioner committee funds to support his Congressional campaign, [Mike McGuire for Congress](#) (FEC ID: C00926519). The Insurance Commissioner committee paid for digital advertising that served no Insurance Commissioner purpose, mischaracterized expenditures as nonmonetary contributions to a ballot measure committee, and failed to properly report and allocate dual-purpose expenditures.

### PARTIES

Senator McGuire currently represents California's 2nd Senate District. He controls both his Insurance Commissioner ("IC") committee and Progress for California ("BMC").

### RELEVANT TIMELINE

- September 16, 2025: Senator McGuire [endorsed](#) Senator Ben Allen for Insurance Commissioner, effectively withdrawing his own candidacy.
- October 9- October 20, 2025: Senator McGuire spent \$175,700 out of the IC committee on digital ads that contained no Insurance Commissioner content.
- November 13, 2025: Senator McGuire [announced his candidacy](#) for Congress (CA-01) and registered his congressional committee.

### FACTUAL BASIS

The following facts are drawn from the Respondents' own Year-End 2025 Form 460 filings, the [Google Ads Transparency Center](#), the [Meta Ad Library](#), and press reports.

#### **The IC Committee Spent \$175,700 on Digital Ads with No Insurance Commissioner Content**

Between October 9 and October 20, 2025, after withdrawing from the IC race, the IC Committee made four payments to AL Media LLC (Chicago, IL) totaling \$175,700:

Date	Code	Description	Amount
10/9/2025	(none)	Online ads	\$15,000
10/20/2025	CTB	Online ads	\$142,500

10/20/2025	(none)	Online ad production	\$7,850
10/20/2025	CTB	Online ad production	\$10,350

Of this total, \$152,850 was coded CTB and reported on Schedule D as nonmonetary contributions to “Yes on 50, The Election Rigging Response Act.” The remaining \$22,850 was reported as direct IC committee expenditures with no ballot measure attribution. (See [IC Form 460](#), Schedule E, pp. 99–102.)

### Ad Content

The IC Committee ran one Google ad from October 21–November 3, 2025 (after withdrawing from the IC race). The ad thumbnail displays a “TRUMP CHEATS” headline with “MIKE McGUIRE / SENATE LEADER” branding and does not reference Prop 50 or any ballot measure. The underlying video content was a Prop 50 ad, though the video is no longer available for playback on Google’s platform. No reference to Insurance Commissioner appears in either the thumbnail or, based on independent review, the video.

The IC Committee ran at least 6 distinct ads on Meta platforms between October 10–November 6, 2025 (after withdrawing from the IC race). Only 2 of 6 reference Prop 50. The other 4 feature anti-Trump messaging and McGuire’s legislative accomplishments on wildfire safety, rural jobs, healthcare, education, and affordability. Independent video review confirms: the non-Prop 50 ads contain no ballot measure references in either text or video content.

No ad on either platform mentions Insurance Commissioner, insurance policy, or any topic related to the IC office.

### Geographic Targeting Confirms Congressional District Focus

Google’s Ads Transparency Center provides the following congressional district-level spending data for the advertisement that was supposedly a contribution to the Prop 50 campaign:

CA-02	\$33,500
CA-04	\$17,000
CA-08	\$100
All other CA districts	\$0.00

As a reminder, Prop 50 was a statewide ballot measure. This geographic concentration — 99.8% of the Google spend in two congressional districts — is inconsistent with statewide ballot measure advocacy. It is clear this spending was meant to present advertisements touting Senator McGuire’s qualifications just prior to launching his congressional campaign in the newly drawn CA-01.

Further, CA-02 and CA-04 overlap with the newly drawn CA-01. County-level targeting confirms: Sonoma, Lake, and Mendocino Counties were specifically included — these counties are the population centers of CA-01.

## **The BMC Spent \$0 on Prop 50 Advertising**

The BMC existed specifically for ballot measure activity but yet the [BMC's Year-End 2025 Form 460](#) reported \$0 in Prop 50 advertising. The choice to route \$152,850 in purported ballot measure spending through the IC Committee instead of the BMC is suspect.

## **Post-Announcement Payments to Congressional Campaign Consultants**

After McGuire's November 13, 2025 congressional announcement, the IC committee made the following payments to consultants associated with the congressional campaign:

- Grant Martin Campaigns: \$7,500 (campaign consultants, 12/8/2025) and \$6,671.46 (fundraising event — chili feed with candidate in attendance, 12/8/2025). Grant Martin is identified as "a spokesperson for McGuire" by the Press Democrat, is listed as the contact ([grant@senatormikemcguire.com](mailto:grant@senatormikemcguire.com)) on the IC Committee's Meta ad disclaimer and is the "manager" of the congressional campaign's Facebook page. (See screenshot, attached.) The FEC filing for McGuire for Congress reports zero payments to Grant Martin Campaigns.
- Breakaway Political (Leo Buc): The IC Committee and BMC paid a combined \$39,375 to Breakaway Political on November 19, 2025 — \$21,375 (commission) and \$9,000 (campaign consultants) from the IC Committee, and \$9,000 (campaign consultants) from the BMC. Buc also operates 5th Office Consulting LLC, which operates the congressional campaign's social media ads. The FEC filing reports zero payments to Breakaway Political or 5th Office Consulting.

## **ALLEGED VIOLATIONS**

### **Misuse of IC Committee Funds (Gov. Code §§ 85200, 85201, 89510(b))**

Under the Political Reform Act, contributions deposited into a candidate's campaign account are held in trust for expenses associated with the candidate's election to the specific elective office as designated in their Statement of Intention. The IC committee was designated for the Insurance Commissioner race. The \$175,700 in digital ads contained no IC content, was made after Senator McGuire withdrew from the IC race, was geographically targeted to the future congressional district, and featured anti-Trump messaging and legislative accomplishments relevant only to his congressional campaign.

If the ad spending is neither legitimate IC activity nor legitimate ballot measure activity, it constitutes use of IC Committee funds for purposes unrelated to the designated office, in violation of § 85201 and the restrictions on campaign fund use under §§ 89510–89518.

### **Improper Expenditure Reporting; Nonmonetary Contributions (Gov. Code § 84211(k))**

\$152,850 of the \$175,700 was reported as nonmonetary CTB to Yes on 50. However, ad library verification shows that a significant portion of the CTB-coded Meta ads contained no Prop 50 references — 4 of 6 Meta ad creatives did not mention Prop 50 in text or video. While the Google ad's video content

was Prop 50 material, its thumbnail — the only element still viewable — presents only anti-Trump imagery and McGuire branding. Further, the IC committee’s own Schedule G shows \$3,187.50 in Google spend that was not CTB-coded, raising questions about how the committee itself characterized the Google spending. Under Regulation 18421.8, dual-purpose expenditures by a candidate-controlled committee require allocation and separate reporting.

#### **Improper Expenditure Reporting; Non-CTB Payments (Gov. Code § 84211(k))**

\$22,850 of the \$175,700 was reported on Schedule E without a CTB code. These payments were not attributed to any ballot measure on the IC Committee’s own filing. If the ads paid for with these funds had the same content as other IC Committee ads (anti-Trump messaging, no IC content), they have no legitimate IC Committee purpose, yet they were reported as IC Committee expenditures rather than contributions.

#### **IC Payments for Congressional Campaign Services (Gov. Code §§ 85201, 84211(k))**

The IC committee paid Grant Martin Campaigns \$14,171.46 and Breakaway Political \$30,375 after McGuire's congressional announcement. Grant Martin and Leo Buc, who operates Breakaway Political, are associated with the congressional campaign but yet neither reportedly received any payment from the congressional committee during the period. If these payments were for services benefiting the congressional campaign, they (1) constitute expenditures unrelated to the IC committee's designated office and (2) should have been reported as contributions to the federal committee.

Further, the \$6,671.46 "fundraising event" with the "candidate in attendance" warrants particular scrutiny — by December 8, 2025, McGuire was a declared congressional candidate, and a fundraising event featuring the candidate could benefit the congressional campaign regardless of which committee hosted it. If these payments were for services that also benefitted the congressional campaign, they should have been reported as contributions to the federal committee.

#### **Misuse of BMC Committee Funds (FPPC Reg. 18521.5(d)(1))**

Under Regulation 18521.5(d)(1), BMC funds “must be used only to make expenditures related to a state or local measure or potential measure.” The BMC paid Breakaway Political \$9,000 for “campaign consultants.” Leo Buc, who operates Breakaway Political, is associated with the congressional campaign but, according to the congressional committee’s filing, did not receive any payment from the congressional committee during the period. If the \$9,000 payment was for congressional campaign consulting rather than ballot measure activity, it violates Reg. 18521.5(d)(1).

### **CONCLUSION**

Based on the foregoing, I respectfully request that the Commission investigate the above-described violations and take appropriate enforcement action.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my knowledge.

Name: Sara Konsavage

Signature: Sara Konsavage

Date: 02-18-2026

## ATTACHMENTS

**Mike McGuire for Congress**  
38K followers · 167 following

Follow Search

Posts About Mentions Reels Photos Live More

**Intro**

State Senator. Candidate for Congress. Erika's husband. Dad to Connor and Gertrude the Wonder Pug.

Page · Government Official · Political Candidate

**GRANT MARTIN CAMPAIGNS**  
is responsible for this Page

Mike.McGuire@SenatorMikeMcGuire.com

VoteMikeMcGuire.com

**Posts**

Mike McGuire for Congress  
12h · [Public]

Unbelievable night - 600 strong @ One Big Night! ... See more

**CONGRESS**

**Mike McGuire for Congress**  
38K followers · 167 following

Follow Search

Posts About Mentions Reels Photos Live More

**Intro**

State Senator. Candidate for Congress. Erika's husband. Dad to Connor and Gertrude the Wonder Pug.

Page · Government Official · Political Candidate

GRANT MARTIN CAMPAIGNS  
is responsible for this Page

Mike.McGuire@SenatorMikeMcGuire.com

**Posts**

Mike McGuire for Congress  
Yesterday at 2:35 PM · [Public]

This February, we've reached an incredible milestone—celebrating 100 years of Black History Month.

The past century has been shaped by unwavering courage, sacrifice, cutting-edge innovation, and hard-fought progress.

This month, we honor that legacy and commit ourselves to the major work ahead.

Prior to February 16, 2026, Grant Martin Campaigns listed as responsible for Mike McGuire for Congress Facebook Page.

**Mike McGuire for Congress**  
 38K followers • 167 following  
 State Senator. Candidate for Congress. Erika's husband. Dad to Connor and Gertrude the Wonder Pug.  
 Government Official

**Links**  
[votemikemcguire.com](http://votemikemcguire.com)

**Contact info**  
[mike.mcguire@senatormikemcguire.com](mailto:mike.mcguire@senatormikemcguire.com)

**Photos**  
[See all photos](#)

**Posts**  
 Mike McGuire for Congress  
 20h · 🌐  
 Monday, February 16, 2026 at 7:35 PM  
 The coldest storm of the year is just about here. Tuesday - Thursday. The forecast is now calling for snow as low as 1,000 feet overnight and into Tuesday... See more  
 👍👏 Larry D. Halstead and 165 others 32 comments 29 shares  
 Like Comment Share  
 View more comments  
 Nicholas Maxwell Winegar  
 BUT THE DOW IS 50,000! Does the storm not know this? ...

**Mike McGuire for Congress**  
 38K followers • 167 following  
 State Senator. Candidate for Congress. Erika's husband. Dad to Connor and Gertrude the Wonder Pug.  
 Government Official

**Links**  
[votemikemcguire.com](http://votemikemcguire.com)

**Contact info**  
[mike.mcguire@senatormikemcguire.com](mailto:mike.mcguire@senatormikemcguire.com)

**Photos**  
[See all photos](#)

**Mike McGuire for Congress** [Close]

To keep Facebook safe, we're showing information about people and their profiles.

- Created: August 17, 2010
- Profile updated: 20 hours ago
- Government Official
- Transparency and privacy policy

**Posts**  
 Mike McGuire for Congress  
 20h · 🌐  
 Monday, February 16, 2026 at 7:35 PM  
 The coldest storm of the year is just about here. Tuesday - Thursday. The forecast is now calling for snow as low as 1,000 feet overnight and into Tuesday... See more  
 👍👏 Larry D. Halstead and 165 others 32 comments 29 shares  
 Like Comment Share  
 View more comments  
 Nicholas Maxwell Winegar  
 BUT THE DOW IS 50,000! Does the storm not know this? ...

As of February 16, 2026, Grant Martin Campaigns no longer listed as responsible for Mike McGuire for Congress Facebook Page. "Political Candidate" designation was also removed from page. Screenshot attached from February 17, 2026.



**Thank you to our endorsers!**

1 message

Grant with Team McGuire <info@votemikemcguire.com>

Tue, Dec 30, 2025 at 12:31 PM



We've been in this race for a little over a month, and we've already been endorsed by the people and organizations folks trust: **Speaker Emerita Nancy Pelosi, Senator Adam Schiff, CA Attorney General Rob Bonta and every Democratic County Supervisor in the First Congressional District** — just to name a few!

Not only that, we have the support of some of the most progressive and impactful organizations in the country, including SEIU California, local firefighters and the International Association of Fire Fighters, and the California Nurses Association.

These endorsements mean so much to Mike. They are recognition of all the work he has put in fighting for the people of Northern California — such as delivering \$3 billion for Northern California over the last 10 years, passing the largest affordability package in 50 years, growing rural jobs and raising wages, and doubling the number of state firefighters.

**They're proof that this campaign is on the right track.**

While we are so incredibly honored to have their support, Mike knows that the most important endorsement is yours. We can only win this race if we're working together from the neighborhood up. This campaign is about people — powered by your grassroots action.

**If you support Mike and also believe he's the best candidate to fight for the prosperity of the North State in Congress, will you chip in \$5, \$15, or whatever you can to help us reach every corner of this beautiful and sprawling district?**

*If you've saved your payment information with ActBlue Express, your donation will go through immediately:*

[DONATE \\$5 »](#)

[DONATE \\$15 »](#)

[DONATE \\$50 »](#)

[DONATE \\$100 »](#)

[DONATE \\$250 »](#)

[ANOTHER AMOUNT »](#)

Are you with us?

— Grant with Team McGuire

[DONATE](#)

Mike McGuire for Congress  
1014 Hopper Avenue  
Suite 506  
Santa Rosa, CA 95403  
United States

[INFO@VOTEMIKEMCGUIRE.COM](mailto:INFO@VOTEMIKEMCGUIRE.COM)



**PAID FOR BY MIKE MCGUIRE FOR CONGRESS**

Email sent December 30, 2025 by "Grant with Team McGuire."

## Spend by where ads were shown

Shown in California, any time

ⓘ This data is currently showing ad spending from the latest redistricting Latest redistricting: Since 2022 ▾

Congressional district	Ad spend ↓
California's 2nd congressional district 2022 redistricting	\$33.5K 
California's 4th congressional district 2022 redistricting	\$17K 
California's 8th congressional district 2022 redistricting	\$100
California's 1st congressional district 2022 redistricting	\$0.00
California's 3rd congressional district 2022 redistricting	\$0.00
California's 5th congressional district 2022 redistricting	\$0.00
California's 6th congressional district 2022 redistricting	\$0.00
California's 7th congressional district 2022 redistricting	\$0.00
California's 9th congressional district 2022 redistricting	\$0.00

Geographical breakdown of Google Ad Spend from IC Committee.



STATE OF CALIFORNIA  
FAIR POLITICAL PRACTICES COMMISSION  
1102 Q Street • Suite 3050 • Sacramento, CA 95811

February 23, 2026

Mike McGuire  
Mike McGuire for Insurance Commissioner 2026  
Progress for California, Senator Mike McGuire Ballot Measure Committee  
Via email: [filings@seowenscompany.com](mailto:filings@seowenscompany.com)

**Re: FPPC Complaint No. COM-02192026-00483; Mike McGuire, Mike McGuire for Insurance Commissioner 2026, Progress for California, Senator Mike McGuire Ballot Measure Committee**

Dear Mike McGuire and Committees:

The Enforcement Division of the Fair Political Practices Commission has received the enclosed sworn complaint against you. It appears the complainant is alleging you have violated the Political Reform Act's<sup>1</sup> campaign finance provisions. The complaint and any attachments filed are enclosed.

At this time, we have not made any determination about the allegation(s) made in the complaint. Within 14 days, the complainant will be notified of our intent to:

- investigate the allegations of the complaint;
- refer the complaint to another governmental agency;
- take no action on the complaint because, on the basis of the information provided, the Commission does not appear to have jurisdiction to investigate; or
- take no action on the complaint because the allegations of the complaint do not warrant the Commission's further action.

A copy of that letter will be forwarded to you. If you have any comments on the allegation(s), your comments must be submitted in writing directed to Vanessa Greer by email to [vgreer@fppc.ca.gov](mailto:vgreer@fppc.ca.gov). Please include the complaint number referenced above in your response.

Sincerely,

---

<sup>1</sup> The Political Reform Act is contained in Government Code sections 81000 through 91014, and all statutory references are to this code. The regulations of the Fair Political Practices Commission are contained in Sections 18104 through 18998 of Title 2 of the California Code of Regulations, and all regulatory references are to this source.

*Kendall L.D. Bonebrake*

Kendall L.D. Bonebrake  
Chief, Enforcement Division

KLDB: vg

Kendall Bonebrake  
Chief, Enforcement Division  
California Fair Political Practices Commission  
1102 Q Street, Suite 3050  
Sacramento, CA 95811

### INTRODUCTION

My name is Sara Konsavage, and I am filing this complaint against Senator Mike McGuire and two of his committees, [Mike McGuire for Insurance Commissioner 2026](#) (FPPC ID: 1456532) and [Progress for California](#) (FPPC ID: 1461632). This complaint alleges that Senator McGuire and his committees violated the Political Reform Act and FPPC Regulations by using Insurance Commissioner committee funds to support his Congressional campaign, [Mike McGuire for Congress](#) (FEC ID: C00926519). The Insurance Commissioner committee paid for digital advertising that served no Insurance Commissioner purpose, mischaracterized expenditures as nonmonetary contributions to a ballot measure committee, and failed to properly report and allocate dual-purpose expenditures.

### PARTIES

Senator McGuire currently represents California's 2nd Senate District. He controls both his Insurance Commissioner ("IC") committee and Progress for California ("BMC").

### RELEVANT TIMELINE

- September 16, 2025: Senator McGuire [endorsed](#) Senator Ben Allen for Insurance Commissioner, effectively withdrawing his own candidacy.
- October 9- October 20, 2025: Senator McGuire spent \$175,700 out of the IC committee on digital ads that contained no Insurance Commissioner content.
- November 13, 2025: Senator McGuire [announced his candidacy](#) for Congress (CA-01) and registered his congressional committee.

### FACTUAL BASIS

The following facts are drawn from the Respondents' own Year-End 2025 Form 460 filings, the [Google Ads Transparency Center](#), the [Meta Ad Library](#), and press reports.

#### **The IC Committee Spent \$175,700 on Digital Ads with No Insurance Commissioner Content**

Between October 9 and October 20, 2025, after withdrawing from the IC race, the IC Committee made four payments to AL Media LLC (Chicago, IL) totaling \$175,700:

Date	Code	Description	Amount
10/9/2025	(none)	Online ads	\$15,000
10/20/2025	CTB	Online ads	\$142,500

10/20/2025	(none)	Online ad production	\$7,850
10/20/2025	CTB	Online ad production	\$10,350

Of this total, \$152,850 was coded CTB and reported on Schedule D as nonmonetary contributions to “Yes on 50, The Election Rigging Response Act.” The remaining \$22,850 was reported as direct IC committee expenditures with no ballot measure attribution. (See [IC Form 460](#), Schedule E, pp. 99–102.)

### Ad Content

The IC Committee ran one Google ad from October 21–November 3, 2025 (after withdrawing from the IC race). The ad thumbnail displays a “TRUMP CHEATS” headline with “MIKE McGUIRE / SENATE LEADER” branding and does not reference Prop 50 or any ballot measure. The underlying video content was a Prop 50 ad, though the video is no longer available for playback on Google’s platform. No reference to Insurance Commissioner appears in either the thumbnail or, based on independent review, the video.

The IC Committee ran at least 6 distinct ads on Meta platforms between October 10–November 6, 2025 (after withdrawing from the IC race). Only 2 of 6 reference Prop 50. The other 4 feature anti-Trump messaging and McGuire’s legislative accomplishments on wildfire safety, rural jobs, healthcare, education, and affordability. Independent video review confirms: the non-Prop 50 ads contain no ballot measure references in either text or video content.

No ad on either platform mentions Insurance Commissioner, insurance policy, or any topic related to the IC office.

### Geographic Targeting Confirms Congressional District Focus

Google’s Ads Transparency Center provides the following congressional district-level spending data for the advertisement that was supposedly a contribution to the Prop 50 campaign:

CA-02	\$33,500
CA-04	\$17,000
CA-08	\$100
All other CA districts	\$0.00

As a reminder, Prop 50 was a statewide ballot measure. This geographic concentration — 99.8% of the Google spend in two congressional districts — is inconsistent with statewide ballot measure advocacy. It is clear this spending was meant to present advertisements touting Senator McGuire’s qualifications just prior to launching his congressional campaign in the newly drawn CA-01.

Further, CA-02 and CA-04 overlap with the newly drawn CA-01. County-level targeting confirms: Sonoma, Lake, and Mendocino Counties were specifically included — these counties are the population centers of CA-01.

## **The BMC Spent \$0 on Prop 50 Advertising**

The BMC existed specifically for ballot measure activity but yet the [BMC's Year-End 2025 Form 460](#) reported \$0 in Prop 50 advertising. The choice to route \$152,850 in purported ballot measure spending through the IC Committee instead of the BMC is suspect.

## **Post-Announcement Payments to Congressional Campaign Consultants**

After McGuire's November 13, 2025 congressional announcement, the IC committee made the following payments to consultants associated with the congressional campaign:

- Grant Martin Campaigns: \$7,500 (campaign consultants, 12/8/2025) and \$6,671.46 (fundraising event — chili feed with candidate in attendance, 12/8/2025). Grant Martin is identified as "a spokesperson for McGuire" by the Press Democrat, is listed as the contact ([grant@senatormikemcguire.com](mailto:grant@senatormikemcguire.com)) on the IC Committee's Meta ad disclaimer and is the "manager" of the congressional campaign's Facebook page. (See screenshot, attached.) The FEC filing for McGuire for Congress reports zero payments to Grant Martin Campaigns.
- Breakaway Political (Leo Buc): The IC Committee and BMC paid a combined \$39,375 to Breakaway Political on November 19, 2025 — \$21,375 (commission) and \$9,000 (campaign consultants) from the IC Committee, and \$9,000 (campaign consultants) from the BMC. Buc also operates 5th Office Consulting LLC, which operates the congressional campaign's social media ads. The FEC filing reports zero payments to Breakaway Political or 5th Office Consulting.

## **ALLEGED VIOLATIONS**

### **Misuse of IC Committee Funds (Gov. Code §§ 85200, 85201, 89510(b))**

Under the Political Reform Act, contributions deposited into a candidate's campaign account are held in trust for expenses associated with the candidate's election to the specific elective office as designated in their Statement of Intention. The IC committee was designated for the Insurance Commissioner race. The \$175,700 in digital ads contained no IC content, was made after Senator McGuire withdrew from the IC race, was geographically targeted to the future congressional district, and featured anti-Trump messaging and legislative accomplishments relevant only to his congressional campaign.

If the ad spending is neither legitimate IC activity nor legitimate ballot measure activity, it constitutes use of IC Committee funds for purposes unrelated to the designated office, in violation of § 85201 and the restrictions on campaign fund use under §§ 89510–89518.

### **Improper Expenditure Reporting; Nonmonetary Contributions (Gov. Code § 84211(k))**

\$152,850 of the \$175,700 was reported as nonmonetary CTB to Yes on 50. However, ad library verification shows that a significant portion of the CTB-coded Meta ads contained no Prop 50 references — 4 of 6 Meta ad creatives did not mention Prop 50 in text or video. While the Google ad's video content

was Prop 50 material, its thumbnail — the only element still viewable — presents only anti-Trump imagery and McGuire branding. Further, the IC committee’s own Schedule G shows \$3,187.50 in Google spend that was not CTB-coded, raising questions about how the committee itself characterized the Google spending. Under Regulation 18421.8, dual-purpose expenditures by a candidate-controlled committee require allocation and separate reporting.

#### **Improper Expenditure Reporting; Non-CTB Payments (Gov. Code § 84211(k))**

\$22,850 of the \$175,700 was reported on Schedule E without a CTB code. These payments were not attributed to any ballot measure on the IC Committee’s own filing. If the ads paid for with these funds had the same content as other IC Committee ads (anti-Trump messaging, no IC content), they have no legitimate IC Committee purpose, yet they were reported as IC Committee expenditures rather than contributions.

#### **IC Payments for Congressional Campaign Services (Gov. Code §§ 85201, 84211(k))**

The IC committee paid Grant Martin Campaigns \$14,171.46 and Breakaway Political \$30,375 after McGuire's congressional announcement. Grant Martin and Leo Buc, who operates Breakaway Political, are associated with the congressional campaign but yet neither reportedly received any payment from the congressional committee during the period. If these payments were for services benefiting the congressional campaign, they (1) constitute expenditures unrelated to the IC committee's designated office and (2) should have been reported as contributions to the federal committee.

Further, the \$6,671.46 "fundraising event" with the "candidate in attendance" warrants particular scrutiny — by December 8, 2025, McGuire was a declared congressional candidate, and a fundraising event featuring the candidate could benefit the congressional campaign regardless of which committee hosted it. If these payments were for services that also benefitted the congressional campaign, they should have been reported as contributions to the federal committee.

#### **Misuse of BMC Committee Funds (FPPC Reg. 18521.5(d)(1))**

Under Regulation 18521.5(d)(1), BMC funds “must be used only to make expenditures related to a state or local measure or potential measure.” The BMC paid Breakaway Political \$9,000 for “campaign consultants.” Leo Buc, who operates Breakaway Political, is associated with the congressional campaign but, according to the congressional committee’s filing, did not receive any payment from the congressional committee during the period. If the \$9,000 payment was for congressional campaign consulting rather than ballot measure activity, it violates Reg. 18521.5(d)(1).

### **CONCLUSION**

Based on the foregoing, I respectfully request that the Commission investigate the above-described violations and take appropriate enforcement action.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my knowledge.

Name: Sara Konsavage

Signature: Sara Konsavage

Date: 02-18-2026

## ATTACHMENTS

This screenshot shows the Facebook profile for Mike McGuire for Congress. The profile picture is a circular portrait of Mike McGuire. The cover photo is a landscape with trees and a field. The page name is "Mike McGuire for Congress" with 38K followers and 167 following. Navigation tabs include Posts, About, Mentions, Reels, Photos, Live, and More. The "Intro" section contains the following text: "State Senator. Candidate for Congress. Erika's husband. Dad to Connor and Gertrude the Wonder Pug." Below this, it lists "Page · Government Official · Political Candidate" and "GRANT MARTIN CAMPAIGNS is responsible for this Page" (highlighted in yellow). Contact information includes "Mike.McGuire@SenatorMikeMcGuire.com" and "VoteMikeMcGuire.com". The "Posts" section shows a post from 12 hours ago with the text "Unbelievable night - 600 strong @ One Big Night! ... See more" and a photo of a large crowd at a "ONE BIG NIGHT! KICKOFF + RALLY".

This screenshot shows the same Facebook profile for Mike McGuire for Congress. The profile picture and cover photo are identical to the first screenshot. The "Intro" section is the same. The "Posts" section shows a post from "Yesterday at 2:35 PM" with the text: "This February, we've reached an incredible milestone—celebrating 100 years of Black History Month. The past century has been shaped by unwavering courage, sacrifice, cutting-edge innovation, and hard-fought progress. This month, we honor that legacy and commit ourselves to the major work ahead."

Prior to February 16, 2026, Grant Martin Campaigns listed as responsible for Mike McGuire for Congress Facebook Page.

**Mike McGuire for Congress**  
 38K followers • 167 following  
 State Senator. Candidate for Congress. Erika's husband. Dad to Connor and Gertrude the Wonder Pug.  
 Government Official

**Links**  
[votemikemcguire.com](http://votemikemcguire.com)

**Contact info**  
[mike.mcguire@senatormikemcguire.com](mailto:mike.mcguire@senatormikemcguire.com)

**Photos**  
[See all photos](#)

**Posts**  
 Mike McGuire for Congress  
 20h · 🌐  
 Monday, February 16, 2026 at 7:35 PM  
 The coldest storm of the year is just about here. Tuesday - Thursday.  
 The forecast is now calling for snow as low as 1,000 feet overnight and into Tuesday... [See more](#)  
 👍👏 Larry D. Halstead and 165 others 32 comments 29 shares  
 Like Comment Share  
 View more comments  
 Nicholas Maxwell Winegar  
 BUT THE DOW IS 50,000! Does the storm not know this? ...

**Mike McGuire for Congress**  
 38K followers • 167 following  
 State Senator. Candidate for Congress. Erika's husband. Dad to Connor and Gertrude the Wonder Pug.  
 Government Official

**Links**  
[votemikemcguire.com](http://votemikemcguire.com)

**Contact info**  
[mike.mcguire@senatormikemcguire.com](mailto:mike.mcguire@senatormikemcguire.com)

**Photos**  
[See all photos](#)

**Mike McGuire for Congress** [Close]

To keep Facebook safe, we're showing information about people and their profiles.

- Created: August 17, 2010
- Profile updated: 20 hours ago
- Government Official
- Transparency and privacy policy

As of February 16, 2026, Grant Martin Campaigns no longer listed as responsible for Mike McGuire for Congress Facebook Page. "Political Candidate" designation was also removed from page. Screenshot attached from February 17, 2026.



**Thank you to our endorsers!**

1 message

Grant with Team McGuire <info@votemikemcguire.com>

Tue, Dec 30, 2025 at 12:31 PM



We've been in this race for a little over a month, and we've already been endorsed by the people and organizations folks trust: **Speaker Emerita Nancy Pelosi, Senator Adam Schiff, CA Attorney General Rob Bonta and every Democratic County Supervisor in the First Congressional District** — just to name a few!

Not only that, we have the support of some of the most progressive and impactful organizations in the country, including SEIU California, local firefighters and the International Association of Fire Fighters, and the California Nurses Association.

These endorsements mean so much to Mike. They are recognition of all the work he has put in fighting for the people of Northern California — such as delivering \$3 billion for Northern California over the last 10 years, passing the largest affordability package in 50 years, growing rural jobs and raising wages, and doubling the number of state firefighters.

**They're proof that this campaign is on the right track.**

While we are so incredibly honored to have their support, Mike knows that the most important endorsement is yours. We can only win this race if we're working together from the neighborhood up. This campaign is about people — powered by your grassroots action.

**If you support Mike and also believe he's the best candidate to fight for the prosperity of the North State in Congress, will you chip in \$5, \$15, or whatever you can to help us reach every corner of this beautiful and sprawling district?**

*If you've saved your payment information with ActBlue Express, your donation will go through immediately:*

[DONATE \\$5 »](#)

[DONATE \\$15 »](#)

[DONATE \\$50 »](#)

[DONATE \\$100 »](#)

[DONATE \\$250 »](#)

[ANOTHER AMOUNT »](#)

Are you with us?

— Grant with Team McGuire

[DONATE](#)

Mike McGuire for Congress  
1014 Hopper Avenue  
Suite 506  
Santa Rosa, CA 95403  
United States

[INFO@VOTEMIKEMCGUIRE.COM](mailto:INFO@VOTEMIKEMCGUIRE.COM)



**PAID FOR BY MIKE MCGUIRE FOR CONGRESS**

Email sent December 30, 2025 by "Grant with Team McGuire."

## Spend by where ads were shown

Shown in California, any time

ⓘ This data is currently showing ad spending from the latest redistricting Latest redistricting: Since 2022 ▾

Congressional district	Ad spend ↓
California's 2nd congressional district 2022 redistricting	\$33.5K 
California's 4th congressional district 2022 redistricting	\$17K 
California's 8th congressional district 2022 redistricting	\$100
California's 1st congressional district 2022 redistricting	\$0.00
California's 3rd congressional district 2022 redistricting	\$0.00
California's 5th congressional district 2022 redistricting	\$0.00
California's 6th congressional district 2022 redistricting	\$0.00
California's 7th congressional district 2022 redistricting	\$0.00
California's 9th congressional district 2022 redistricting	\$0.00

Geographical breakdown of Google Ad Spend from IC Committee.



STATE OF CALIFORNIA  
FAIR POLITICAL PRACTICES COMMISSION  
1102 Q Street • Suite 3050 • Sacramento, CA 95811

March 2, 2026

Sara Konsavage

Via email: [REDACTED]

**Re: FPPC Complaint No. COM-02192026-00483; Mike McGuire, Mike McGuire for Insurance Commissioner 2026, Progress for California, Senator Mike McGuire Ballot Measure Committee**

Dear Sara Konsavage:

The Enforcement Division of the Fair Political Practices Commission received your sworn complaint alleging violations of the campaign finance provisions of the Political Reform Act. After reviewing the complaint, we have concluded that we will require additional time beyond the initial 14-day period to evaluate this matter in order to determine whether additional investigation is appropriate. We appreciate your patience in this regard.

Please be advised that, at this time, we have not made any determination about the validity of the allegations you have made or about the culpability, if any, of those you identify in your complaint. If you have any questions regarding this letter, you may contact Vanessa Greer at [vgreer@fppc.ca.gov](mailto:vgreer@fppc.ca.gov) or 279-237-5965.

Sincerely,

*Kendall L.D. Bonebrake*

Kendall L.D. Bonebrake  
Chief, Enforcement Division

KLDB: vg

cc: Richard Rios o/b/o Mike McGuire, Mike McGuire for Insurance Commissioner 2026, Progress for California, Senator Mike McGuire Ballot Measure Committee