

**BEFORE THE
FEDERAL ELECTION COMMISSION
Washington, D.C. 20463**

COMPLAINT

(Pursuant to 52 U.S.C. § 30109(a)(1), 52 U.S.C. § 30102(e)(1))

I. COMPLAINANT

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II. RESPONDENTS

Eric Michael Swalwell
Former U.S. Representative (CA-14)

Swalwell for Congress
Principal Campaign Committee
FEC ID: C00502294

III. JURISDICTION AND AUTHORITY

This complaint is filed pursuant to 52 U.S.C. § 30109(a)(1). The Federal Election Commission has jurisdiction over the Respondents as Eric Swalwell was a federal candidate and “Swalwell for Congress” is his authorized principal campaign committee under 52 U.S.C. § 30102(e)(1).

IV. INTRODUCTION

This complaint supplements and expands upon a prior complaint regarding the misuse of campaign funds for full-time personal childcare. The newly identified expenditures— including alcohol purchases, hotels, and personal consumption after termination of Respondent’s candidacy—demonstrate that the earlier misconduct was not isolated, but part of a broader and continuing pattern of personal use of campaign funds.

Newly available evidence—including Respondents’ own latest FEC filings and multiple published reports—demonstrates a pattern and practice of converting campaign funds to personal use, including:

- Alcohol purchases and delivery charges
- Hotels and luxury accommodations
- Food, rideshare, and delivery services
- Continued spending after termination of candidacy
- Payments to full time live-in nanny for childcare

These expenditures appear systematic, personal, and unrelated to any bona fide campaign or winding-down activity, in violation of federal campaign finance law, mostly coming after Swalwell withdrew his candidacy for US Congress.

V. STATEMENT OF FACTS

Respondent Eric Swalwell, through his authorized committee “Swalwell for Congress” (FEC ID: C00502294), raised and spent substantial donor funds during the 2025–2026 election cycle. Official FEC records show total disbursements exceeding \$1.7 million during this period.

On or about November 21, 2025, Respondent publicly abandoned his re-election campaign for California’s 14th Congressional District in order to pursue a California gubernatorial campaign. Despite having terminated his congressional candidacy, Respondent’s congressional committee continued to incur significant operating expenditures in 2026.

FEC filings confirm that during the first quarter of 2026 (January 1 – March 31, 2026), Respondent’s committee reported \$72,400.93 in operating expenditures, notwithstanding the absence of an active congressional campaign. See Exhibit B (FEC Form 3, April Quarterly Report). These expenditures followed substantial disbursements in late 2025, as reflected in the committee’s Year-End Report covering October 1 – December 31, 2025. See Exhibit A. An amended filing for that same period further reflects revisions to reported activity. See Exhibit C.

Public reporting based on Respondent’s own FEC disclosures reveals that, after abandoning his congressional campaign, Respondent spent more than \$75,000 in early 2026 on items including hotels, meals, transportation, and personal services. See Exhibit D. These expenditures included thousands of dollars in food and beverage charges, nearly \$10,000 in rideshare expenses, and repeated hotel stays, including locations near Respondent’s residence.

In addition, Respondent’s campaign records reflect a sustained pattern of alcohol-related expenditures. Over multiple years, the campaign recorded more than 100 separate alcohol delivery charges, including purchases associated with travel and entertainment. See Exhibit E. Independent reporting further confirms that Respondent billed numerous alcohol-related purchases directly to campaign accounts, including repeated delivery transactions. See Exhibit F.

These alcohol expenditures were not isolated. Reports indicate that Respondent's campaign spent thousands of dollars on alcohol deliveries alone, forming part of a broader pattern of spending on restaurants, delivery services, and entertainment-related expenses. See Exhibit D; Exhibit E.

Separately, as documented in prior filings, Respondent's campaign made repeated payments for childcare services to an individual associated with his household, live-in full time nanny and Brazilian national Amanda Barbosa. See prior complaint and supporting records (incorporated herein). These payments were recurring and continuous, indicating full-time childcare rather than limited, incremental campaign-related expenses.

Taken together, the FEC filings (Exhibits A–C) and corroborating reports (Exhibits D–F) establish that, after abandoning his congressional candidacy, Respondent continued to use campaign funds for a wide range of personal expenditures—including alcohol purchases, hotels, child care, meals, transportation, and personal services—that are unrelated to any active campaign and are consistent with personal use.

This pattern reflects ongoing disbursement of donor funds for expenses that would exist irrespective of candidacy and that are not reasonably attributable to winding down a federal campaign.

VI. FACTUAL BACKGROUND

A. Termination of Congressional Candidacy

Eric Swalwell publicly abandoned his re-election campaign for Congress on or about November 21, 2025, in order to pursue a gubernatorial campaign.

Despite this, his congressional campaign committee continued to spend significant sums in 2026.

FEC filings confirm substantial continued disbursements, including \$72,400.93 in operating expenditures during Q1 2026 alone.

B. Post-Candidacy Spending Pattern

Public reporting based on FEC disclosures indicates that, after abandoning his congressional campaign, Respondent:

- Spent over \$75,000 in early 2026 on:
 - Hotels
 - Meals and beverages
 - Transportation
 - Personal services

- Charged thousands of dollars in alcohol purchases, including:
 - Over 100 alcohol-related transactions via delivery services

- Approximately \$6,100 in alcohol deliveries alone
- Incurred:
 - Nearly \$10,000+ in rideshare expenses
 - Thousands in food delivery and restaurant charges

These expenditures occurred after the campaign had effectively ceased electoral activity.

C. Alcohol and Entertainment Spending

Reports indicate Respondent's campaign:

- Recorded 100+ alcohol-related charges
- Used donor funds for repeated alcohol deliveries
- Included expenditures tied to travel and entertainment, including Las Vegas trips

Such expenditures raise serious questions as to whether they were:

- Campaign-related
- Legitimate winding-down costs
- Or instead personal consumption subsidized by campaign funds

D. Continued Pattern of Personal Use (Childcare)

As previously alleged, Respondent's campaign made recurring payments to a domestic worker Brazilian national Amanda Barbosa for childcare.

Example entries include:

- Payments to "Amanda Barbosa" for "child care" services across multiple dates and amounts

While labeled as campaign-related, the frequency, continuity, and structure of these payments strongly suggest full-time personal childcare, not limited or incremental campaign-related expenses as required by FEC rulings.

E. Scale of Campaign Spending

FEC data shows:

- Total disbursements exceeding \$1.7 million during the 2025–2026 cycle
- Significant ongoing operating expenditures even after campaign cessation

This demonstrates that the improper expenditures were not isolated but part of a broader spending pattern.

VII. LEGAL VIOLATIONS

A. Conversion of Campaign Funds to Personal Use

(52 U.S.C. § 30114(b))

Campaign funds may not be used for “personal use,” defined as any expense that would exist irrespective of the campaign.

The following categories strongly indicate personal use:

- Alcohol purchases and deliveries
- Restaurant and entertainment expenses
- Hotels near Respondent’s residence
- Rideshare and delivery services unrelated to campaign activity
- Full-time childcare

These expenses would exist irrespective of candidacy and therefore constitute prohibited personal use.

B. Improper Use of Funds After Campaign Termination

Once a campaign is no longer active, funds may only be used for limited purposes such as:

- Winding down campaign obligations
- Charitable donations
- Transfers to other political committees

The continued pattern of:

- Lifestyle expenditures
- Personal consumption
- Non-winding-down operational spending

violates these restrictions.

C. Reporting and Mischaracterization Concerns

To the extent expenditures were reported as legitimate campaign expenses when they were personal:

- Reports may be false or misleading under 52 U.S.C. § 30104
- Mislabeling personal expenses as campaign-related undermines FEC transparency requirements

VIII. PATTERN AND PRACTICE

The evidence demonstrates a systematic pattern, not isolated incidents:

- Repeated alcohol-related charges
- Recurring personal service expenses
- Ongoing spending after campaign termination
- Prior childcare misuse allegations

Taken together, this reflects a deliberate conversion of campaign funds to subsidize personal lifestyle expenses.

IX. REQUEST FOR INVESTIGATION

Complainant respectfully requests that the Federal Election Commission:

1. Investigate all disbursements by “Swalwell for Congress” from November 2025 onward
2. Determine whether expenditures constituted:
 - Personal use
 - Improper post-campaign spending
3. Audit:
 - Alcohol-related charges
 - Travel and hotel expenditures
 - Childcare payments
4. Impose appropriate:
 - Civil penalties
 - Restitution requirements
5. Refer any knowing and willful violations for criminal enforcement if warranted

X. CONCLUSION

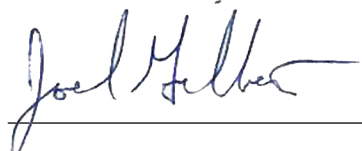
Respondents appear to have used donor funds not for electoral purposes, but to support:

- Personal consumption
- Lifestyle expenses
- Household services

Such conduct, if proven, strikes at the core of federal campaign finance law and warrants immediate investigation.

XI. VERIFICATION

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



Joel Gilbert

April 22, 2026

EXHIBIT INDEX

Exhibit A – FEC Form 3 Year-End Report (Oct 1 – Dec 31, 2025)

Exhibit B – FEC Form 3 Quarterly Report (Jan 1 – Mar 31, 2026)

Exhibit C – Amended FEC Filing (Oct 1 – Dec 31, 2025)

Exhibit D – \$75K Post-Campaign Spending Article (Apr 18, 2026)

Exhibit E – Staggering Number of Booze Deliveries Article (Apr 19, 2026)

Exhibit F – Donor \$\$\$ Pour In, Drinks Pour Out Article (Apr 19, 2026)

EXHIBIT A

Swalwell for Congress – FEC Form 3 (Year-End Report)

Covering Period: October 1, 2025 – December 31, 2025

FEC Image No. 202601309795278844

Pages: 641

Full Document Online Location:

<https://docquery.fec.gov/pdf/844/202601309795278844/202601309795278844.pdf>

EXHIBIT B

Swalwell for Congress – FEC Form 3 (April Quarterly Report)

Covering Period: January 1, 2026 – March 31, 2026

FEC Image No. 202604159863099845

Pages: 135

Full Document Online Location:

<https://docquery.fec.gov/pdf/844/202601309795278844/202601309795278844.pdf>

EXHIBIT C

Swalwell for Congress – Amended FEC Filing
Covering Period: October 1, 2025 – December 31, 2025

FEC Image No. 202604179863183182

Pages: 650

Full Document Online Location:

<https://docquery.fec.gov/pdf/182/202604179863183182/202604179863183182.pdf>

EXHIBIT D

California Post

Published April 18, 2026

US NEWS **EXCLUSIVE DETAILS**

Eric Swalwell blew \$75K from defunct congressional campaign on booze, hotels and more, filings show

By **Gabrielle Fahmy**

Published April 18, 2026

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Updated April 18, 2026, 7:36 a.m. PDT

Listen to Hillary Clinton's closed-door opening statement during her House Oversight deposition on Jeffrey Epstein



00:00 / 00:00

Disgraced former US Rep. Eric Swalwell burned through more than \$75,000 from his congressional campaign during the first quarter of 2026 — despite ditching the race five months ago.

He splurged on hotels, meals, booze and even babysitters, newly released FEC filings show.



Eric Swalwell didn't have a good answer for the expenses when contacted by The Post Friday.

Instagram/@ericswalwell

The sex pest had announced on Nov. 21, 2025, he was abandoning his re-election bid for California's 14th Congressional District representing the San Francisco suburbs, embarking instead on a run for the Democratic Party's nomination for governor.

Under campaign finance laws, the money raised prior to an abandoned bid can only be spent on limited uses — such as winding down office expenses, contributing to other candidates, and donating to charity.

EXPLORE MORE



Sicko who rubbed his genitals on woman's face in SoCal Whole Foods arrested



Labor Secretary Lori Chavez-DeRemer resigns from Trump admin after misconduct investigation first exposed by The Post



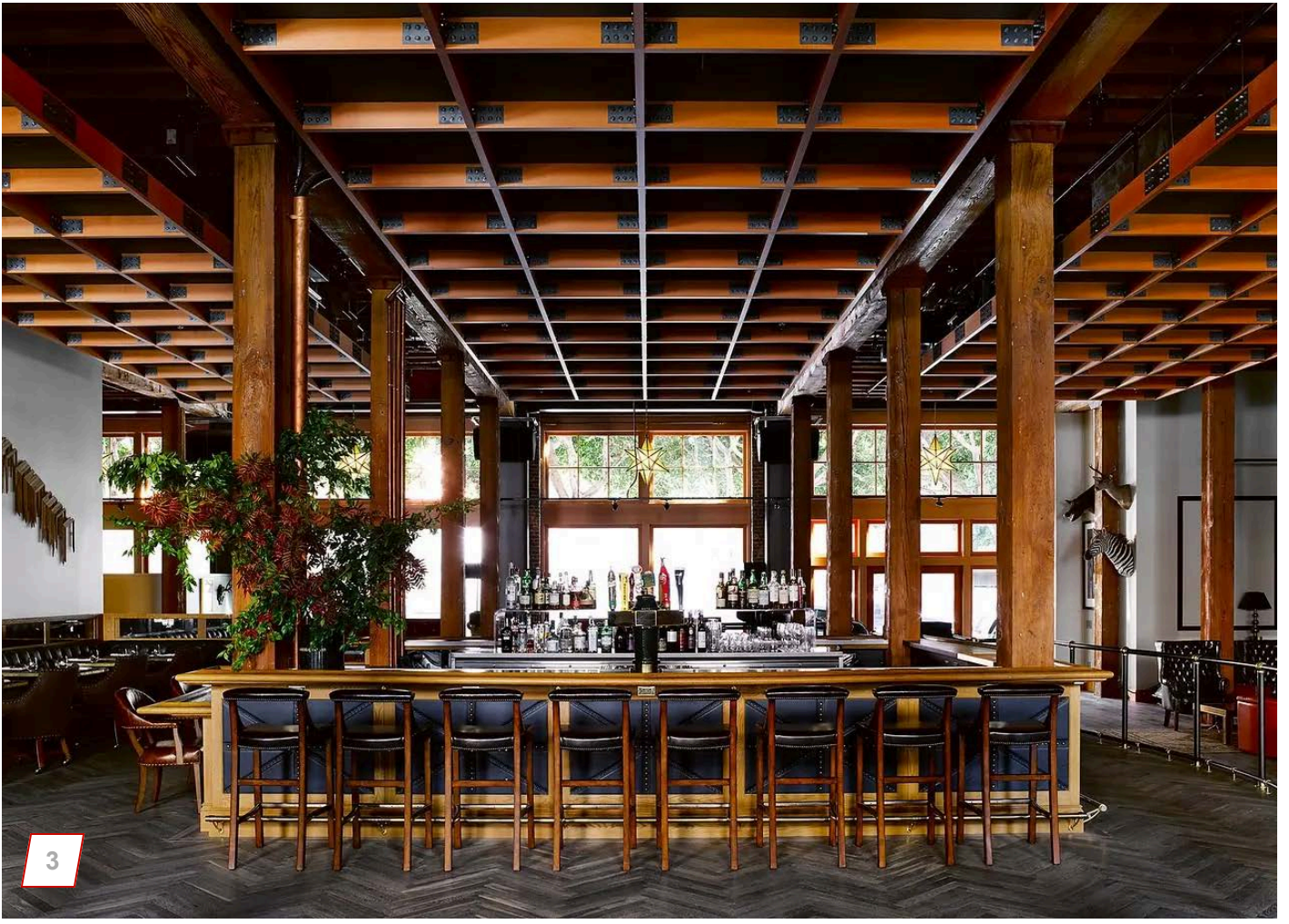
Louisiana killer dad's possible motive revealed after slaughtering 8 kids

But during the first three months of 2026, Swalwell spent \$4,948 on hotels near home, including the Stanford Hotel in San Francisco and the private members club The Battery in the city, both in February.

He expensed another \$5,963 on food and beverages, including \$429 at Washington, DC microbrewery Blue Jacket; \$330 at Buffalo Bill's bar in Hayward, California; \$310 at the famed Minetta Tavern in Greenwich Village, and \$44 at Harry's Reserve, a DC liquor store.

He dished out another \$2,839 on UberEats, the FEC records show.

Swalwell also blew an astounding \$10,298 on Uber and Lyft rides over the course of those three months — an average of more than \$110 a day.



Some of the expenses for food and lodging were made to the private Battery Club in San Francisco.

The Battery/ Facebook



Expenses were also made to nanny Amanda Barbosa, whose employment by Swalwell is under DHS investigation.

Obtained by NY Post

Other travel expenses included airfare, which totaled \$6,242 for the quarter.

Meanwhile, the embattled lefty politician paid \$5,091 for childcare to his live-in Brazilian nanny **Amanda Barbosa**. He and wife Brittany Swalwell are under investigation by the **Department of Homeland Security** for allegations they employed Barbosa without valid work authorization for two years.

Swalwell has since left the gubernatorial race in disgrace — **and his House seat**, too — in the wake of the bombshell sexual assault allegations.

232 **What do you think? Post a comment.**

EXHIBIT E

California Post

Published April 19, 2026

POLITICS **EXCLUSIVE**

Staggering number of booze deliveries Eric Swalwell charged to campaign — including Vegas bender

By [Josh Koehn](#)

Published April 19, 2026, 7:00 a.m. PT

CALIFORNIA POST

Edition CA NY

[US News](#) [California News](#) [California Politics](#) [World News](#)

Disgraced ex-congressman Eric Swalwell — who is **accused of raping and sexually assaulting multiple women** after nights of heavy drinking — billed an eye-watering amount of booze deliveries to

his campaigns, including charges during a series of jaunts to Las Vegas.

Over a four-year period starting in 2020, Swalwell's donor-funded congressional campaigns recorded more than 100 separate charges with now-defunct alcohol delivery company Drizly, according to federal campaign disclosures — purchases that even caught his team off guard.

While the ex-congressman's boozy campaign spending could be legal, "it might not be the best use of donor money," Swalwell's former chief of staff Alex Evans told the California Post.

"He knew exactly what he was doing."



Eric Swalwell's campaigns recorded 100+ separate charges with now-defunct alcohol delivery company Drizly.

AFP via Getty Images

Swalwell's Drizly spending alone accounted for roughly a quarter of all payments to the service from various candidates' campaigns, political committees and PACs since 2019, according to the Federal Election Commission.

EXPLORE MORE



Famous activist who worked with Oprah and Biden stabbed, mother butchered inside their LA home



Horrific moment mountain lion breaks into SoCal woman's backyard and rips apart her husky and Anatolian shepherd



Louisiana mass shooter killed himself in front of ex-Army mentor's home after slaughtering 8 kids

Campaign records show that his tab — totaling roughly \$6,100 — also overlapped with him curiously taking multiple trips to Las Vegas in the summer of 2021.

In July of that year, Swalwell racked up thousands of dollars in charges for hotel stays at the Cosmopolitan Las Vegas, a five-star hotel and casino. Swalwell appears to have visited the Cosmopolitan three times over a 10-day period that month — on July 9, 12 and 19.



In July 2021, Swalwell racked up thousands of dollars in charges for hotel stays at the Cosmopolitan Las Vegas.

[Instagram/cosmopolitan_lv](https://www.instagram.com/cosmopolitan_lv)

During that period, he made several purchases from Drizly while also billing his campaign for a \$117.54 charge at STK Steakhouse and a \$439.57 bill at Jean Georges Steakhouse at Aria. Charges continued through July 19, including a \$940.01 transaction at the Cosmopolitan, bringing the total cost of his time in Vegas over 10 days to more than \$3,100.

Drizly was folded into Uber Eats in early 2024, and records show Swalwell's congressional campaigns continued to use the Uber Eats food and drink delivery app more than 220 times after Drizly shut down, including as recently as this year. The charges, which don't detail whether the purchases were for food and/or alcohol, totaled more than \$19,000.

The Post's review of congressional campaign filings found that Swalwell ramped up his alcohol purchases with Drizly starting in May 2020 during the onset of the COVID-19 pandemic, billing his

donors 36 times for a total of \$2,405 through the end of the year.

Sen. Ruben Gallego — who has been under fire for ignoring warning signs about Swalwell's behavior, as the two commonly referred to each other as their “best friend” in Congress — was also a fan of Drizly. He recorded 14 different campaign charges with the alcohol delivery service worth \$814 from 2022 to 2024.

Here's the latest on the allegations against Rep. Eric Swalwell

Staggering number of booze deliveries Eric Swalwell charged to campaign — including Vegas bender

Eric Swalwell blew \$75K from defunct congressional campaign on booze, hotels and more, filings show

Bill Maher calls Eric Swalwell a ‘f–king creep,’ says he ‘never liked’ the disgraced Democrat

Rep. Jimmy Gomez — member of Eric Swalwell's ‘Cool Kids Clique’ — accused of kissing much younger staffer



Eric Swalwell's partying has come to light after he was accused of sexual assault by multiple women.

Instagram/@Bubblebathgirl

Multiple ethics experts told The Post that campaign spending rules are quite expansive, but Swalwell's booze-buying raised eyebrows.

"In this case, the sheer number of alcohol purchases can raise some questions about whether the campaign funds were being used for a proper purpose," Loyola Law School Professor Jessica Levinson told The Post.

"Somebody should sort out whether these purchases fall within election laws," she added.

Swalwell's lavish spending on drinks, meals and hotels — and even payments to himself — with a congressional campaign account have continued this year, well after he announced his run for governor.

The Post exclusively reported that **Swalwell spent a staggering half-million dollars on hotels** during his time in Congress.



Swalwell appears to have visited the a Vegas hotel three times over a 10-day period in July 2021.

REUTERS

Separate filings show that Swalwell paid himself almost \$219,000 in campaign funds for childcare, security and other expenses since 2021, while also racking up more charges at traditional liquor stores.

“We’re not talking about somebody spending their own money,” Levinson said, adding that it’s “absolutely fair” to be scrutinizing Swalwell’s use of campaign funds after his resignation from Congress on Tuesday. “We’re talking about somebody spending donors’ money.”

Swalwell listed himself as his congressional campaign’s treasurer in a new filing on Friday.

The ex-congressman was the leading Democrat in the race for California governor until an unprecedented career last week following allegations of sexual misconduct.



Swalwell has denied any criminal activities but admitted to indiscretions that led him to apologize to his wife.

Getty Images

After two bombshell reports in which several women lodged accusations that included rape, sexual assault, and other deviant behavior, Swalwell suspended his campaign and relinquished his seat in Congress. Meanwhile, he also became the focus of investigations by the Department of Justice and district attorneys in New York and Los Angeles.

Swalwell hired anti-MeToo movement attorney Sara Azari and has strenuously denied any wrongdoing while apologizing to his wife and family for “personal failings.”

“These accusations are false, fabricated, and deeply offensive,” Azari said in a statement, adding that the allegations are “a calculated and transparent political hit job designed to destroy the reputation of a man who has spent 20 years in public service.”

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Lonna Drewes, a 50-year-old model, accused Swalwell of rape following what she described as a night involving alcohol.

AP

Four women who spoke to CNN described a pattern of inappropriate and, at times, aggressive behavior by Swalwell in social and political settings where alcohol was involved. The women said Swalwell became increasingly forward as he drank, making unwanted advances, attempting to initiate sexual contact, and, in some cases, creating situations they described as coercive or uncomfortable.

Separately, a former staffer who **spoke to the San Francisco Chronicle** described what she said was an encounter in which Swalwell, after drinking, made unwanted physical advances that she did not consent to. She also accused him of sexual assault.



Ethics experts believe Swalwell's campaign spending should also be investigated on top of criminal allegations.

Getty Images

On Tuesday, Lonna Drewes, a 50-year-old model, **accused Swalwell of rape** following what she described as a night involving alcohol. Drewes said she met Swalwell at events where he offered to help her business and later accompanied him to his hotel room, where she believes her drink was drugged after consuming alcohol.

She alleged she became physically incapacitated and that Swalwell raped and choked her until she lost consciousness. Swalwell was married and his wife was pregnant at the time of the alleged incident.

“He created a bodyguard of lies to protect himself and allow this behavior to continue,” Evans said.

“He’s one of the world’s greatest liars ever.”

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EXHIBIT F

TMZ

Published April 19, 2026



Blake Lively Tells Court Her 'Mean Girl' Label Cost Her \$40.5 Million



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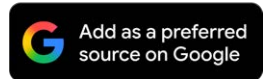
Eric Swalwell Accused of Charging Alcohol Deliveries to Campaign Funds

ERIC SWALWELL DONOR \$\$\$ POUR IN, DRINKS POUR OUT ... 100+ Booze Charges on Campaign Tab

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By *TMZ STAFF*

Published *April 19, 2026 1:42 PM PDT*





Getty

Disgraced ex-congressman **Eric Swalwell** is catching heat again -- this time for allegedly running up a boozy tab on his own campaign's dime.

Swalwell's campaign allegedly racked up more than 100 alcohol delivery charges over a four-year period starting in 2020 ... with booze bills reportedly tied straight to congressional campaign funds instead of his own wallet, according to a **NY Post** report.

TMZ



Getty

Yeah ... you read that right. Campaign cash -- the kind donors fork over to win elections -- allegedly being used for repeated liquor store runs.

This all comes on the heels of Swalwell's recent political downfall. He **stepped away** from Congress last week amid a separate scandal involving sexual assault accusations that had already put his judgment under intense scrutiny -- making these new claims hit even harder.





Getty

The filings show a pattern of spending that wasn't just a one-off. We're talking dozens upon dozens of alcohol orders, painting a picture of a full-blown open bar situation funded by supporters.

And it gets even messier ... because some of those charges reportedly line up with trips to Las Vegas, where things allegedly went from casual drinks to full-on partying ... which is not exactly the kind of image any politician wants tied to their campaign finances.





PARTY BOY

Video: Eric Swalwell Caught in Bathrobe at Wild Yacht Party

Instagram/@nikrichie

Now, here’s the problem ... campaign finance rules are pretty clear. Donations are supposed to go toward legit political expenses, not personal indulgences. So naturally, this kind of spending is raising major red flags and could invite deeper scrutiny into how campaign funds were used.

Donors thought they were investing in a political future ... not picking up the tab for someone else’s happy hour.

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