



NATIONAL LEGAL AND POLICY CENTER

March 27, 2026

Office of General Counsel
Federal Election Commission
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Washington, DC 20002
Email: EnfComplaint@fec.gov

Office of Congressional Conduct
Attn: Omar Ashmawy, Chief Counsel
U.S. House of Representatives
425 3rd Street, S.W.
Suite 1110
Washington, DC 20024
Email: conduct@mail.house.gov

**RE: NATIONAL LEGAL AND POLICY CENTER JOINT COMPLAINT
AGAINST U.S. REPRESENTATIVE ALEXANDRIA OCASIO-CORTEZ,
ALEXANDRIA OCASIO-CORTEZ FOR CONGRESS, AND TREASURER
FRANK LLEWELLYN, FOR USING CAMPAIGN FUNDS FOR PERSONAL USE**

Dear Counsel:

The National Legal and Policy Center (NLPC), a nonprofit organization dedicated to promoting ethics in government, hereby files this joint complaint with the Federal Election Commission (FEC) against U.S. Representative Alexandria Ocasio-Cortez (AOC), Alexandria Ocasio-Cortez for Congress, and its Treasurer Frank Llewellyn and with the Office of Congressional Conduct (OCC) against AOC individually, for violating FEC and similar House Ethics rules prohibiting the expenditure of campaign contributions for personal use.¹

¹ NLPC has a robust program of filing ethics and FEC complaints against members of Congress, including AOC. NLPC filed an ethics complaint against AOC for violating the House Gift Rule in 2021 for attending the Met Gala in New York. The House Ethics Committee subsequently found she violated the gift rule with respect to her wearing the infamous “Tax the Rich” dress and accepting related beauty and other services. <https://nlpc.org/featured-news/office-of-congressional-ethics-says-aoc-may-have-broken-house-rules-and-federal-law/>. NLPC had also filed an FEC complaint against AOC’s campaign committee in 2022. <https://www.fec.gov/data/legal/matter-under-review/7575/>. NLPC has a pending complaint with the OCC against Representative Ilhan Omar for misreporting her financial assets and income.

In particular, NLPC alleges that AOC’s expenditure of almost \$19,000 of campaign funds in 2025 to psychiatrist Dr. Brian W. Boyle ostensibly for “leadership training and consulting” was expended instead for personal psychiatric services provided to AOC or members of her campaign staff. Accordingly, those expenses were also misreported by the campaign committee with the FEC. NLPC requests that the FEC and OCC immediately investigate the facts and circumstances of these payments and impose appropriate penalties and disciplinary sanctions against AOC.

STATEMENT OF FACTS

According to FEC records, AOC campaign paid psychiatrist Dr. Brian W. Boyle \$11,550 on March 10, 2025; \$2,800 on May 15, 2025; and \$4,375 on October 1, 2025, for a total of \$18,725 ostensibly for “Leadership Training and Consulting.”²

Spender	Recipient	State	Description	Disbursement date	Amount
<u>ALEXANDRIA OCASIO-CORTEZ FOR CONGRESS</u>	BOYLE, BRIAN W.	MA	LEADERSHIP TRAINING AND CONSULTING	10/01/2025	\$4,375.00
<u>ALEXANDRIA OCASIO-CORTEZ FOR CONGRESS</u>	BOYLE, BRIAN W.	MA	LEADERSHIP TRAINING AND CONSULTING	05/15/2025	\$2,800.00
<u>ALEXANDRIA OCASIO-CORTEZ FOR CONGRESS</u>	BOYLE, BRIAN W.	MA	LEADERSHIP TRAINING AND CONSULTING	03/10/2025	\$11,550.00

According to recent story in the *New York Post* by Gabrielle Fahmy, there is reason to believe that Dr. Boyle does not provide campaign “Leadership Training and Consulting” but instead provides psychiatric treatment specializing in Ketamine therapy:

Boyle, a Harvard-trained doctor, calls himself an “interventional psychiatrist” and specializes in unorthodox methods for treatment-resistant depression, PTSD and anxiety.

<https://nlpc.org/government-integrity-project/complaint-filed-against-rep-ihan-omar-for-implausible-financial-disclosures/>

²https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00639591&recipient_name=boyle&two_year_transaction_period=2026

He's considered a "leading authority" on ketamine, the controversial horse tranquilizer given to "Friends" star Matthew Perry in the month leading up to his tragic death.

"I just saw the incredible power of what these treatments could do," Boyle said during a podcast appearance last year about getting into the mind-blowing biz. "It's a ton of fun helping patients get better."³

Dr. Boyle lists his specialties and expertise in treating the following mental disorders:



Specialties and Expertise

Expertise

- ADHD
- Anxiety
- Bipolar Disorder
- Borderline Personality (BPD)
- Coping Skills
- Depression
- Emotional Disturbance
- Medication Management
- Narcissistic Personality (NPD)
- Obsessive-Compulsive (OCD)
- Personality Disorders
- Psychosis
- Trauma and PTSD

Nowhere does Dr. Boyle advertise offering "Leadership Training" or "consulting" services to candidates or their campaign. Communications to Dr. Boyle and AOC's campaign

³ Gabrielle Fahmy, "AOC spends \$19K in campaign cash on psychiatrist known for ketamine therapy," New York Post (March 21, 2026). <https://nypost.com/2026/03/21/us-news/aoc-spends-more-than-18k-on-psychiatrist-known-for-ketamine-therapy/>

to comment on these expenditures went unanswered.⁴ Indeed, there are several established political consulting organizations that do provide leadership training for Democrat campaigns.⁵

AOC's admitted prior use of psychiatric therapy suggests that she would consult Dr. Boyle for therapy as well. As reported in the *New York Post* story:

The Bronx and Queens lawmaker has previously talked about her own mental health, revealing she was in therapy following the [Jan. 6 Capitol riots](#), when she said lawmakers effectively "served in war."

*"Oh yeah, I'm doing therapy," she said on the public radio show *Latino USA* in 2021, calling the day when she hid in the bathroom, fearing for her life as police banged on the door, "an extraordinarily traumatizing event."⁶*

Accordingly, there is reason to believe that the expenditure of almost \$19,000 to Dr. Brian Boyle was for personal mental health care rather than for campaign leadership training and consultation.⁷

FEC Rules Against Using Campaign Funds for Personal Use

The Federal Election Campaign Act and FEC rules prohibit the use of campaign funds for personal use.⁸ FEC defines "personal use" as follows:

⁴ Dr. Boyle's refusal to comment on any psychiatric treatment of AOC or her campaign staff as his patients would be understandable to protect their privacy under HIPPA.

⁵ See, e.g., National Democratic Training Committee (NDTC) https://traindems.org/?gad_source=1&gad_campaignid=22792687158&gclid=Cj0KCQjw1ZjOBhCmARIsADDuFTCzZoWn0YlqSDbRRK_VV0nksSN8RANdrH4EpLjdeFpMkr8ucXRxaEaAhQIEALw_wcB

The Campaign Workshop <https://www.thecampaignworkshop.com/tag/campaign-training-for-democrats>

Democratic Socialists of America <https://www.dsausa.org/trainings/>

⁶ See fn. 3, *supra*.

⁷ AOC has a history of misusing campaign contributions. See Gabrielle Fahmy, "AOC spent \$2,000 in campaign cash to hire pricey celebrity makeup artist: 'outrageous,'" *New York Post* (Mar. 14, 2026). <https://nypost.com/2026/03/14/us-news/aoc-hired-celebrity-makeup-artist-campaign-finance-records-show/>. See also <https://nlpc.org/government-integrity-project/socialist-aoc-loves-pricey-makeup-pampering/>

⁸ FEC – Personal Use. <https://www.fec.gov/help-candidates-and-committees/making-disbursements/personal-use/>

Personal use. *Personal use means any use of funds in a campaign account of a present or former candidate to fulfill a commitment, obligation or expense of any person that would exist irrespective of the candidate's campaign or duties as a Federal officeholder.*

The FEC's so-called "irrespective test" means that any "expense" that would exist if the person were not a candidate or officeholder is an expense for "personal use." The FEC regulations provide some examples of what would constitute "per se" personal expenses that would not be allowed to be paid for with campaign contributions, such as "household items," "clothing," "mortgage," and "vacations." 11 C.F.R. 1311(g)(1)(i)(A)-(J).⁹

On the other hand, there are some expenses that the FEC will examine on a "case by case basis" to determine whether they qualify as personal expenses, such as "meals," "travel expenses," and "vehicle expenses," where a portion of those expenses were used for legitimate campaign expenses. In that case, the campaign may only pay for that portion of the expense used for the campaign. 11 C.F.R. 1311(g)(1)(ii)(A)-(D).

Thus, while AOC's campaign reported that the \$19,000 expenditure was ostensibly used for "leadership training" which, if true, would seem to constitute a campaign expense, there is reason to believe that Dr. Brian Boyle's psychiatric services were for therapeutic treatment of AOC or her campaign staff as his patients, in which case, that would constitute personal use.

Under FEC procedures, AOC and her campaign will have five days after being notified of NLPC's complaint to explain these expenditures, after which the FEC may find "reason to believe" an FEC violation may have occurred and conduct further investigation by requesting the production of documents and testimony from relevant parties.¹⁰

House Ethics Rules Prohibit a Member from Using Campaign Funds for Personal Use

The House of Representatives has an analog rule to the FEC's rule forbidding the use of campaign funds for personal use, as explained in its Memorandum on December 30, 2024.

As stated in that Memorandum:

*House Rules prohibit personal use of campaign funds and impose a **separate and additional requirement** that Members be able to verify the legitimacy of campaign disbursements. House Rule 23, clause 6(b) states that*

⁹ <https://www.ecfr.gov/current/title-11/chapter-I/subchapter-A/part-113/section-113.1>

¹⁰ https://www.fec.gov/resources/cms-content/documents/policy-guidance/respondent_guide.pdf

*“[a] Member . . . may not convert campaign funds to personal use in excess of an amount representing reimbursement for **legitimate and verifiable** campaign expenditures; and . . . may not expend funds from [the Member’s] campaign account . . . that are not attributable to bona fide campaign or political purposes.”*

Members are responsible for their campaigns’ compliance with this House Rule. Members must oversee their campaigns to ensure the legitimacy of all campaign expenditures and the sufficiency of related expense verification records. (bold emphasis in original).¹¹

Campaign Expenditures Must be Legitimate

Legitimate campaign expenditures serve a bona fide campaign or political purpose and do not involve the use of campaign funds for any personal purpose. Although Members have wide discretion to determine what constitutes a bona fide campaign or political purpose, “[a] bona fide campaign purpose is not established merely because the use of campaign money might result in a campaign benefit as an incident to benefits personally realized by the recipient of such funds.”

In other words, under no circumstances may Members convert campaign funds to personal use for themselves or for anyone else. Campaign funds may not be used to enhance an individual’s lifestyle, for personal enjoyment or entertainment, or to pay an individual’s personal obligations. Nor may Members borrow campaign funds or loan them to anyone for a personal purpose.

Campaign Expenditures Must be Verifiable

The verification requirement of clause 6 is wholly separate from and in addition to FEC campaign record-keeping requirements. This common-sense requirement is necessary due to the volume of campaign expenditures Members’ campaigns typically make. The legitimacy of a campaign expenditure may be subject to review long after the expense was made and memories have faded. Without a verification requirement, there would be no reliable way to ensure campaign funds are not converted to personal use. (Emphases in original).¹²

NLPC submits that there is reason to believe that AOC’s use of campaign funds to pay for a psychiatrist who has no experience in “leadership training” was not for a “bona fide

¹¹ Committee on Ethics, “MEMORANDUM FOR ALL MEMBERS, OFFICERS, AND EMPLOYEES”, Subject: “Legitimate and Verifiable Use of Campaign Funds,” (Dec. 30, 2024). <https://ethics.house.gov/wp-content/uploads/2024/12/FINAL-Legitimate-and-Verifiable-Use-of-Campaign-Funds-Pink-Sheet.pdf>

¹² *Id.* (footnotes omitted).

campaign or political purpose,” but rather for personal psychiatric therapy for AOC or her campaign staff.

Accordingly, for the foregoing reasons, NLPC submits that, at a minimum, the OCC conduct a Preliminary Review of its complaint under OCC’s Rule 7 because there clearly is a “reasonable basis” to believe the allegations.¹³ Because a preliminary review “may be triggered by a written request of two members of the Board, such action does not require a vote by the (six-member) Board and therefore, a quorum need not be present.”¹⁴

After a preliminary review, a Second-Phase Review under Rule 8 should be conducted which requires a vote of three members of the Board because NLPC there is also “probable cause” to believe the allegations.¹⁵ Requests to AOC, her treasurer, and even Dr. Brian Boyle to provide documentary evidence and testimony should be provided. Finally, we submit that this matter should be referred to the House Ethics Committee because there is “substantial reason to believe” AOC used campaign funds for personal purposes. While the OCC has investigatory tools, unlike the OCC, the House Ethics Committee can issue subpoenas to witnesses and impose disciplinary action against AOC.

* * *

As required by FEC rules regarding the filing of a complaint, I hereby certify and affirm that this complaint is filed under penalty of perjury.

As required by OCC rules, I hereby certify to the best of my knowledge and ability, all evidence submitted was not obtained in violation of any law, rule, or regulation. Further, I am aware that 18 U.S.C. 1001 applies to information submitted to the Office of Congressional Conduct.

NLPC reserves the right to supplement this Complaint with additional information it may obtain.

¹³ https://conduct.house.gov/sites/evo-subsites/oce.house.gov/files/evo-media-document/occ-rules-for-the-conduct-of-investigations_adopted-may-2025_vf.pdf “A reasonable basis to believe the allegation(s) exists when there is a reasonable and articulable basis for believing the allegation(s)....” Commentary, Rule 7.

¹⁴ *Id.*

¹⁵ According to the OCC's Rules, probable cause means that "the evidence is sufficient to lead a person of ordinary caution and prudence to believe or entertain a strong suspicion that a Member, officer or employee committed a violation." <https://conduct.house.gov/about/citizen-s-guide>

Respectfully submitted,

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