

BEFORE THE FEDERAL ELECTION COMMISSION

Robert J. Fillion
2938 SW Woodstock Lane
Topeka, KS. 66614

v.

Adam Hamilton
3420 W 193rd Street
Stilwell, KS 66085-8783

Church of the Resurrection
13720 Roe Avenue
Leawood, KS 66224

COMPLAINT

For more than a century, corporations (including nonprofit corporations) have been prohibited from making contributions to federal candidates.¹ The ban on corporate contributions is one of the most diligently enforced provisions in the Federal Election Campaign Act (“FECA”), with the Federal Election Commission regularly entering into conciliation agreements and levying civil penalties against campaigns that violate the law.² Some corporations have even been criminally prosecuted by the Department of Justice for using corporate resources to unlawfully support campaigns.³

Nevertheless, despite the well-known ban on corporate contributions, Adam Hamilton blatantly used the corporate resources of the church where he serves as Senior Pastor to publicly announce that he is exploring a candidacy for the United States Senate in Kansas. This complaint is filed pursuant to 52 U.S.C. §§ 30118(a) and 30109(a)(1) and is based upon public information providing reason to believe that Respondents have violated FECA’s ban on corporate contributions and associated Commission regulations.

¹ Tillman Act of 1907, ch. 420, 34 Stat. 684.

² See, e.g., MUR 7248 (Cancer Treatment Centers of America Global, Inc. *et al.*) (imposing a \$288,000 joint civil penalty for illegal use of corporate resources for political campaigns); MUR 5849 (Bank of America) <https://www.fec.gov/files/legal/murs/5849/29044252838.pdf> (imposing a \$1,800 civil penalty for \$10,030 in illegal corporate contributions); MUR 6184 (Skyway Concession Company, LLC) <https://www.fec.gov/files/legal/murs/6184/29044252724.pdf> (imposing a \$4,000 civil penalty for \$13,085 in illegal corporate contributions).

³ U.S. Dep’t of Justice, *Houston Engineering Corporation Enters Into Corporate Resolution and Agrees to Pay \$1.6 Million Fine* (Nov. 22, 2019), <https://www.justice.gov/archives/opa/pr/houston-engineering-corporation-enters-corporate-resolution-and-agrees-pay-16-million-fine> (\$1.6 million fine imposed for \$323,300 corporate contribution reimbursement scheme);

FACTS

On February 27, 2026, Adam Hamilton publicly announced that he was exploring a candidacy for the 2026 United States Senate election in Kansas. The announcement was not in itself remarkable—multiple candidates have already announced that they are running in this election—but the medium by which Hamilton shared his personal news was distinctive.

Rather than announcing the creation of his exploratory committee by calling a press conference or posting on his personal social media accounts, Hamilton instead announced his exploratory committee via a website and YouTube channel ***maintained by Church of the Resurrection***, a United Methodist Church where he serves as Senior Pastor (hereinafter the “Church”).

On February 27, 2026, the Church added a page to its website headlined “Pastor Adam Hamilton Explores a Possible Run for the U.S. Senate.”⁴ This page includes a list of questions and answers concerning Hamilton’s potential candidacy, including “[w]ould church resources be used for the campaign?”⁵ The Church proceeded to answer the question concerning the use of church resources ***by using church resources*** to answer as follows:

No. Clear firewalls would be established and monitored by the Staff Parish Relations Committee (SPRC) to ensure separation between the church and a potential campaign. Specifically:

- ***Staff:** Church staff would not work on the campaign during work hours.*
- ***Data:** The church database is private and would never be shared with a campaign or outside group.*
- ***Facilities:** No campaign events would be permitted on church property.*
- ***Technology:** Church devices cannot be used for non-church activities.*
- ***Communication:** Church newsletters and social media would not promote a campaign. Pastor Adam’s social media channels are his personal communication tools.⁶*

The Church webpage also embeds Hamilton’s eleven-minute-and-thirty-five-second exploratory committee announcement video (hereinafter the “Video”), which was first posted on the official YouTube channel for “Church of the Resurrection.”⁷ The description accompanying the Video links back to the FAQs posted on the Church website.⁸ The Video begins with an animation of the Church’s logo, and the Church logo is superimposed over the bottom right-hand

⁴ Resurrection, a United Methodist Church, Pastor Adam Hamilton Explores a Possible Run for the U.S. Senate, available at: <https://resurrection.church/seniorpastor/#sprc>.

⁵ *Id.*

⁶ *Id.*

⁷ YouTube, Church of the Resurrection, *Pastor Adam Hamilton Explores a Possible Run for the U.S. Senate*, https://www.youtube.com/watch?v=Zebuh_DtKqw&t=4s.

⁸ *Id.*

corner of the screen for the entire duration. Hamilton begins the Video by stating “[i]f you didn’t see or read my email and you’re seeing this video on the Church’s website, you can read the email there and an FAQ from our Staff Parish Committee.”⁹ This indicates that in addition to posting Hamilton’s announcement on the Church’s website and YouTube channel, the Church also utilized an internal Church mailing list to email Hamilton’s statement to the Church’s members.

The Church was incorporated in the State of Kansas on October 3, 1991, as a “domestic not-for-profit corporation,” and the Church’s original articles of incorporation stated that it was organized “exclusively for religious, charitable or educational purposes.”¹⁰ This statement of purpose closely tracks the language of 26 U.S.C. § 501(c)(3), and upon information and belief the Church appears to be exempt from taxation as a 501(c)(3) religious organization.

Although it has now been 52 days since Hamilton announced that he was exploring a Senate candidacy, he has yet to make a formal campaign announcement or file a Statement of Candidacy with the Federal Election Commission, nor has he reported any campaign contributions or expenditures to the Commission.¹¹

CAUSE OF ACTION

COUNT 1

Prohibited Contribution(s) by Corporation

Under FECA, a contribution is defined as any “gift, subscription, loan, advance, or deposit of money, or anything of value made by any person for the purpose of influencing any election for Federal office.”¹² The phrase “anything of value” includes all in-kind contributions.¹³ The term “person” includes corporations.¹⁴

Federal law prohibits corporations, including nonprofit corporations such as the Church, from making contributions to Federal candidates.¹⁵ If a corporation makes corporate resources available to one Federal candidate for free, then it must do the same for “any candidate or political committee upon request.”¹⁶ Furthermore, Section 501(c)(3) of the Internal Revenue Code exempts an organization from federal taxation if it is “organized and operated exclusively

⁹ *Id.* at 0:14-0:21.

¹⁰ Office of the Sec’y of State, Church of the Resurrection—United Methodist, available at: <https://www.sos.ks.gov/eforms/BusinessEntity/Search.aspx> (search for business name “Church of the Resurrection”).

¹¹ *See* Fed. Election Comm’n, Candidate and Committee Profiles, <https://www.fec.gov/data/search/?search=adam+hamilton> (zero results for candidates or committees associated with the name “Adam Hamilton”).

¹² 52 U.S.C. § 30101(8); 11 C.F.R. § 100.52.

¹³ 11 C.F.R. § 100.52(d)(1).

¹⁴ 52 U.S.C. § 30101(11).

¹⁵ 52 U.S.C. § 30118(a).

¹⁶ 11 C.F.R. § 114.13.

for religious, charitable, . . . or educational purposes,” so long as such organization “does not participate in, or intervene in (including the publishing or distributing of statements), any political campaign on behalf of (or in opposition to) any candidate for public office.”

There is reason to believe that the Church, by making its corporate resources available to Adam Hamilton so that he could announce his exploratory campaign for U.S. Senate, has violated 52 U.S.C. § 30118(a) and 11 C.F.R. § 114.2(b) by making an illegal corporate contribution to a Federal campaign.

The Church has made an in-kind contribution to Hamilton’s nascent campaign by allowing him to utilize channels of communication that are owned and controlled by the Church—a nonprofit corporation—to communicate his political message to the Church’s members. Specifically, the Church has: (1) emailed Hamilton’s announcement to every individual on the Church’s mailing list (a list of unknown size); (2) posted Hamilton’s full video announcement to the Church’s YouTube channel to ensure that it would be seen by the Church’s 18,500 subscribers; and (3) reposted the announcement video and email message to a dedicated page on the Church’s website, where the Church also uploaded a list of FAQs related to the Church’s involvement in Hamilton’s campaign.

The Church FAQs are particularly interesting, because in hosting Hamilton’s announcement the Church has already violated each of the “clear firewalls” outlined in response to the question about the campaign’s use of church resources. The Church’s explanations are replicated below, with the manner in which the Church has violated its own firewalls outlined in bold and italicized language:

1. Church staff would not work on the campaign during work hours.
There is reason to believe that Church staff were used to email Hamilton’s message to the Church’s mailing list, post Hamilton’s announcement on the Church YouTube channel, and create a dedicated page about Hamilton’s exploration of candidacy on the Church website. It is unlikely that Hamilton personally maintains the Church website or social media pages, and in any event the Church website was updated no later than 11:05 AM Central Time on Friday, February 27, 2026—i.e., during work hours.
2. The church database is private and would never be shared with a campaign or outside group.
There is reason to believe that the Church database was used to send Hamilton’s announcement to each individual included on the Church mailing list, because Hamilton references an email at the beginning of the Video. In other words, Hamilton’s campaign has already been allowed to use the Church database to make a political announcement to the Church’s members.
3. No campaign events would be permitted on church property.

A campaign event—i.e., the announcement that Hamilton is exploring a Senate candidacy—has already been held on church property because the Video was posted on the Church’s YouTube channel and the Church website. The Church’s website is the Church’s property. Furthermore, while it is not clear where Hamilton filmed his eleven-minute announcement Video, it is likely that the Video was filmed in a professional studio maintained by the Church using Church audio/visual equipment.

4. Church devices cannot be used for non-church activities. *As stated above, while it is not clear where Hamilton filmed his eleven-minute announcement Video, it is likely that the Video was filmed in a professional studio maintained by the Church using Church audio/visual equipment.*
5. Church newsletters and social media would not promote a campaign. *Remarkably, the Church assures its members that Church communication channels will never be used to promote Hamilton’s candidacy by posting this message on the Church website and simultaneously cross-promoting the same message on the Church’s YouTube channel and mailing list. Hence, the statement refutes itself.*

In short, the Church has violated the Federal Election Campaign Act by making corporate resources available to Hamilton to publicly promote his campaign for Federal office, thereby resulting in an illegal in-kind contribution to the campaign. The Church has also violated the Internal Revenue Code by intervening in a political campaign, ignoring the express conditions of its 501(c)(3) tax-exempt status.

PRAYER FOR RELIEF

1. Wherefore, the Commission should find reason to believe that Respondents have engaged in a knowing and willful violation of 52 U.S.C. § 30118(a) and 11 C.F.R. § 114.2(b), and move expeditiously to compel Respondents to comply with the law.
2. Further, the Commission should determine and impose appropriate sanctions for any and all violations, should enjoin Respondent(s) from any and all violations in the future, and should impose such additional remedies as are necessary and appropriate to ensure compliance with the FECA.

Dated: 04/23/26

Respectfully submitted,



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