

FEDERAL ELECTION COMMISSION

In the matter of:

MUR ____

Stop China Now, Inc.
Save Western Culture
Seth Martin, Treasurer, Save Western Culture
in his official capacity as treasurer and in his personal capacity
Unknown Respondent (or Respondents)

COMPLAINT

1. Citizens for Responsibility and Ethics in Washington (“CREW”) brings this complaint before the Federal Election Commission (“FEC” or “Commission”), seeking an immediate investigation and enforcement action against Stop China Now, Inc. (“Stop China Now”), Save Western Culture, Seth Martin, and Unknown Respondent (or Respondents) for direct and serious violations of the Federal Election Campaign Act (“FECA”).

2. The FECA prohibits making and knowingly accepting a contribution in the name of another person, as well as knowingly permitting one’s name to be used to effect a contribution in the name of another person. This complaint concerns a super PAC and the corporate entity that completely funded it with a \$1.6 million contribution just two weeks after the corporation was formed. The two organizations, which share a mailing address at a UPS store in Massachusetts, appear to be part of a deliberate scheme to deny voters participating in 20 federal elections across 14 states information about the actual source or sources of funds Save Western Culture used to pay for independent expenditures seeking to influence their democratic decisions. The close temporal proximity between Stop China Now’s incorporation and its seven-figure political contribution to Save Western Culture, along with an apparent lack of activity that could explain how Stop China Now generated sufficient income in such a short time period to pay for the contribution, indicates that there is reason to believe an Unknown Respondent (or Unknown

Respondents) used Stop China Now as a conduit to make a contribution to Save Western Culture, which then spent the money on political ads. These apparent violations of law deprive the public of important information and should be investigated.

Complainants

3. Complainant CREW is a non-profit corporation, organized under section 501(c)(3) of the Internal Revenue Code. CREW is committed to protecting the right of citizens to be informed about the activities of government officials and to ensuring the integrity of government officials. CREW is dedicated to empowering voters to have an influential voice in government decisions and in the governmental decision-making process. CREW uses a combination of research, litigation, and advocacy to advance its mission.

4. In furtherance of its mission, CREW seeks to expose unethical and illegal conduct of those involved in government. One way CREW does this is by educating citizens regarding the integrity of the electoral process and our system of government. Toward this end, CREW monitors the campaign finance activities of those who run for federal office and publicizes those who violate federal campaign finance laws through its website, press releases, and other methods of distribution. CREW also files complaints with the FEC when it discovers violations of the FECA. Publicizing campaign finance violators and filing complaints with the FEC serve CREW's mission of keeping the public informed about individuals and entities that violate campaign finance laws and deterring future violations.

5. In order to assess whether an individual, candidate, political committee, or other regulated entity is complying with federal campaign finance law, CREW needs the information contained in receipts and disbursements reports political committees and others must file pursuant to the FECA, 52 U.S.C. § 30104; 11 C.F.R. §§ 104.1–22, 109.10. CREW is hindered in

its programmatic activity when an individual, candidate, political committee, or other regulated entity fails to disclose campaign finance information in reports of receipts and disbursements required by the FECA.

6. CREW relies on the FEC's proper administration of the FECA's reporting requirements because the FECA-mandated disclosure reports are the only source of information CREW can use to determine if an individual, candidate, political committee, or other regulated entity is complying with the FECA. The proper administration of the FECA's reporting requirements includes mandating that all disclosure reports required by the FECA are properly and timely filed with the FEC. CREW is hindered in its programmatic activity when the FEC fails to properly administer the FECA's reporting requirements.

Respondents

7. Stop China Now is a tax-exempt organization incorporated in Delaware on October 3, 2024 under section 501(c)(4) of the Internal Revenue Code. Stop China Now, Inc., Delaware Department of State, Division of Corporations, Entity Details (saved Dec. 6, 2024), <https://www.documentcloud.org/documents/25448383-stop-china-now-inc-delaware-entity-detail> [s/](#); Delaware Department of State, Division of Corporations, Certificate of Incorporation of Stop China Now, Inc. (Oct. 2, 2024), <https://www.documentcloud.org/documents/25451228-stop-china-now-inc/>. Stop China Now's address is 21 Mohawk Trail, PMB 197, Greenfield, MA, 01301. Save Western Culture, FEC Form 3X, 2024 Post-General Report of Receipts and Disbursements (Dec. 5, 2024), <https://docquery.fec.gov/pdf/257/202412059720486257/202412059720486257.pdf>; *see also Privacy Policy*, Stop China Now, <https://stopchinanow.org/#privacy> (last updated Oct. 25, 2024). The address is not associated with a physical office or residence, but is instead a UPS Store that

offers private mailbox services. Ally Mutnick, *Did Libertarians spoil the GOP's chances of a bigger House majority?*, Politico (Nov. 27, 2024), <https://www.politico.com/news/2024/11/27/libertarian-spoiler-house-republicans-00191876>; see also *Mailbox Servies: The UPS Store Greenfield*, The UPS Store, <https://locations.theupsstore.com/ma/greenfield/21-mohawk-trl/mailbox-services> (last visited Dec. 13, 2024).

8. Save Western Culture is an independent expenditure-only political committee (“super PAC”) established on October 11, 2024. Save Western Culture, FEC Form 1, Statement of Organization, Oct. 11, 2024, <https://docquery.fec.gov/pdf/562/202410119684872562/202410119684872562.pdf>. Save Western Culture uses the same address as Stop China Now: 21 Mohawk Trail, PMB 197, Greenfield, MA, 01301. *Id.*; see also *Privacy Policy*, Save Western Culture, <https://savewesternculture.com/#privacy> (last updated Oct. 25, 2024).

9. Seth Martin is treasurer of Save Western Culture. Save Western Culture, FEC Form 1, *supra*. Mr. Martin also incorporated Stop China Now. Delaware Department of State, Division of Corporations, Certificate of Incorporation of Stop China Now, Inc., *supra*.

10. Unknown Respondent (or Respondents) are the true source or sources of funds Stop China Now transferred to Save Western Culture, as well as the conduit or conduits, if any, through which such funds passed before being contributed to Stop China Now.

Factual Allegations

11. Stop China Now was incorporated on October 3, 2024. Stop China Now, Inc., Delaware Department of State, Division of Corporations, Entity Details, *supra*. Eight days later, Save Western Culture was registered with the FEC. Save Western Culture, FEC Form 1, *supra*.

12. On October 17, 2024, Stop China Now gifted, deposited, or distributed \$1.6 million to Save Western Culture. Save Western Culture, FEC Form 3X (Dec. 5, 2024), *supra*. Save Western Culture reported receiving Stop China Now’s funds as a “contribution,” *id.*, and thus transfers to influence federal elections, 52 U.S.C. § 30101(8). Stop China Now is the only contributor that Save Western Culture has reported to the FEC. Save Western Culture, FEC Form 3X (Dec. 5, 2024), *supra*; Save Western Culture, FEC Form 3X, 2024 Pre-General Report of Receipts and Disbursements (Oct. 23, 2024), <https://docquery.fec.gov/pdf/877/202410239710170877/202410239710170877.pdf>.

13. On the same day it received funds from Stop China Now, Save Western Culture began paying for independent expenditures in federal elections, including paying more than \$200,000 that day for direct mail advertising in the Texas Senate race that opposed Sen. Ted Cruz (R-TX) and supported Libertarian candidate Ted Brown, as well as more than \$180,000 that day in direct mail advertising in the Maryland Senate race that opposed former Maryland governor Larry Hogan, the Republican candidate, and supported Libertarian candidate Mike Scott. Save Western Culture, FEC Form 3X (Dec. 5, 2024), *supra*. Ally Mutnick & Jessica Piper, *‘It’s a very dangerous strategy’: The controversial tactic super PACs used to boost Democrats this year*, Politico (Dec. 7, 2024), <https://www.politico.com/news/2024/12/07/2024-election-congress-controversial-tactic-third-party-00193124>; Tom Hall, Teria Rogers, & Sam Bermas-Dawes, *Libertarian Mike Scott seeks Maryland’s open U.S. Senate seat*, WYPR (Oct. 8, 2024), <https://www.wypr.org/show/midday/2024-10-08/libertarian-mike-scott-seeks-marylands-open-u-s-senate-seat>. In total, between October 17 and November 1, 2024, Save Western Culture paid

\$1,398,194.49 for independent expenditures in 20 federal elections in 14 states. Save Western Culture, FEC Form 3X (Dec. 5, 2024), *supra*.

14. Save Western Culture’s independent expenditures generally opposed Republican House and Senate candidates and supported Independent or Libertarian candidates running in the same races. *Id.* The super PAC’s spending was viewed in the press as a “mysterious” and “shadowy” effort to benefit Democratic candidates in the various races. Ryan King, *Mysterious super PAC with potential Dem ties props up third party to undercuts GOP in tough races: Republicans*, N.Y. Post (Oct. 29, 2024), <https://nypost.com/2024/10/29/us-news/mysterious-super-pac-props-up-libertarians-undercuts-go-p-in-tough-races/>; Emily Brooks, *Shadowy groups seek to hurt House GOP incumbent by boosting independent challenger*, The Hill (Nov. 1, 2024), <https://thehill.com/homenews/house/4964854-independent-candidate-boosted/>; Taylor Giorno, *Opaque nonprofit donation to shadowy super PAC raises ‘several red flags’*, The Hill (Dec. 12, 2024), <https://thehill.com/homenews/campaign/5034983-opaque-nonprofit-donation-to-shadowy-super-pac-raises-several-red-flags/>. *Politico* noted that none of the three vendors Save Western Culture reported paying previously appeared in any FEC records. Mutnick & Piper, *supra*. One of the vendors, Apex Growth Strategies, was incorporated in Arizona in 2023 by a former staffer for the late Sen. John McCain (R-AZ) named Gibson McKay. *Id.*; Apex Growth Strategies, LLC, Articles of Organization, Arizona Corporation Commission (Mar. 24, 2023), <https://www.documentcloud.org/documents/25450329-apex-growth-strategies-arizona-articles-of-incorporation/>. An aide to one of the Republican candidates targeted by Save Western Culture

told *Politico* that McKay told him that Save Western Culture was aligned with Democrats. Mutnick & Piper, *supra*.

15. The only other public activities of Stop China Now, which does not appear to conduct any business, complemented Save Western Culture's independent expenditures and further indicate Stop China Now's use as an entity to anonymously influence elections. Stop China Now's website, which was registered several days before the organization was incorporated, consists of a single main page with minimal descriptions of the organization's claimed "mission" and "positions," and a privacy policy page. DomainTools, WhoIs Look Up, Stopchinanow.org, <https://whois.domaintools.com/stopchinanow.org> (last visited Dec. 16, 2024); *see* Stop China Now Home Page, <https://stopchinanow.org/> (last visited Dec. 13, 2024); *see also* *Privacy Policy*, Stop China Now, *supra*. The website does not offer any information about the organization's specific activities or the individuals behind its efforts. While utilizing different texts and color schemes, Stop China Now's website features essentially the same layout as Save Western Culture's website. *Compare* Stop China Now Home Page, *supra*, with Save Western Culture Home Page, <https://savewesternculture.com/> (last visited Dec. 13, 2024). The two websites also appear to use the same privacy policy, which both say were last updated on the same day, October 25, 2024. *Compare* *Privacy Policy*, Stop China Now, *supra*, with *Privacy Policy*, Save Western Culture, *supra*. Both privacy policy pages list the same address for the two entities: 21 Mohawk Trail, PMB 197, Greenfield, MA, 01301. *Id.*; *Privacy Policy*, Stop China Now, *supra*.

16. Stop China Now appears to have complemented the express advocacy it funded through Save Western Culture by paying for text messages during the days leading up to the 2024 election that targeted at least one of the candidates that was also targeted by Save Western

Culture. The text, a copy of which was posted online by a reporter, stated, “Former Gov. Larry Hogan locked down our schools, small businesses, and private gatherings. Americans should not be locked down by our own government.” @MatthewFoldi, X (Oct. 31, 2024, 10:28 PM), <https://x.com/MatthewFoldi/status/1852175852169027996>. The text stated that it was “PAID FOR BY STOP CHINA NOW” and encouraged recipients to click on a link to a negative video ad framed as a non-express advocacy issue ad. *Id.* The text-distributed video ad, which did not actually mention China or policy related to it, criticized former governor Hogan over his COVID policies while he was actively in office and encouraged recipients to call Hogan and tell him “our leaders need to fight for our medical freedom.” *Id.* Notably, Hogan was not an elected official at the time of the text messages, suggesting that expenditures behind the texts were aimed at impacting his Senate candidacy rather than advocating for specific policy issues.

17. Stop China Now appears to have made additional thinly veiled political expenditures complementing the express advocacy expenditures by Save Western Culture, which were made possible by the funds that flowed to it through Stop China Now. In particular, the anti-robocall company NoMoRobo recorded multiple robocalls, apparently paid for by Stop China Now, in the days before the election, targeting at least eight federal candidates who were also opposed by Save Western Culture’s independent expenditures, including two candidates—former Maryland Governor Larry Hogan and businesswoman Laurie Buckhout—who were not government officials at the time. Save Western Culture, FEC Form 3X (Dec. 5, 2024), *supra*; *see also* (970) 833-6735 is a Political Robocall, NoMoRobo (Nov. 1, 2024), <https://www.nomorobo.com/lookup/970-833-6735> (“Call Congresswoman [Lori] Chavez-Deremer . . . ”); (325) 632-4135 is a Political Robocall, NoMoRobo (Nov. 3, 2024), <https://www.nomorobo.com/lookup/325-632-4135> (“Call Senator [Ted] Cruz . . . ”); (517)

273-8323 is a Political Robocall, NoMoRobo (Nov. 1, 2024),
<https://www.nomorobo.com/lookup/517-273-8323> (“Call Congressman [David] Schweikert . . .
”); (510) 544-1374 is a Chinese Robocall, NoMoRobo (Nov. 4, 2024),
<https://www.nomorobo.com/lookup/510-544-1374> (“Call Laurie Buckhout . . . ”); (251)
320-7143 is a Political Robocall, NoMoRobo (Oct. 31, 2024),
<https://www.nomorobo.com/lookup/251-320-7143> (“Call Congressman [Juan] Ciscomani . . . ”);
(517) 273-8322 is a Business Voice Listing Robocall, NoMoRobo (Nov. 1, 2024),
<https://www.nomorobo.com/lookup/517-273-8322> (“Call Larry Hogan . . . ”); (308) 208-0679 is
a Business Voice Listing Robocall, NoMoRobo (Oct. 30, 2024),
<https://www.nomorobo.com/lookup/308-208-0679> (“Call Congressman [Don] Bacon . . . ”);
(971) 399-8549 is a Robocall, NoMoRobo (Nov. 3, 2024),
<https://www.nomorobo.com/lookup/971-399-8549> (“Call [Tom] Barrett . . . ”).

18. On information and belief, Stop China Now did not generate sufficient income in the two weeks between its formation and the date on which it contributed \$1.6 million to Save Western Culture to account for the contribution. Rather, it appears that an Unknown Respondent (or Respondents) provided the \$1.6 million to Stop China Now to make the contribution to Save Western Culture.

Count I

19. Federal law prohibits the making and the knowing receipt of a contribution in the name of another. 52 U.S.C. § 30122; 11 C.F.R. § 110.4(b).

20. There is reason to believe that an Unknown Respondent (or Respondents) made a contribution in the name of another in violation of 52 U.S.C. § 30122 and 11 C.F.R. § 110.4(b). Specifically, an Unknown Respondent (or Respondents) made a \$1.6 million contribution to

Save Western Culture in the name of Stop China Now. Reason to believe is supported by the fact that Stop China Now made the seven-figure contribution just two weeks after the corporation was formed, a very short time span to raise and spend such a large sum. Furthermore, there is no evidence of any activity by Stop China Now in the brief window between its formation and the contribution that could explain the provenance of the money used for the contribution other than as an infusion of funds for the purpose of making the contribution. Stop China Now's only other known activities appear to have occurred after the organization made the \$1.6 million contribution to Save Western Culture and those activities directly complemented the super PAC's political expenditures that were paid for by the funds provided by Stop China Now. Finally, though the identity of the individuals involved with Stop China Now other than Mr. Martin are currently unknown, there are multiple indications that the organization is part of a political project with Save Western Culture, which was formed just over one week after Stop China Now, and may be operated by the same people. Not only did Mr. Martin incorporate Stop China Now and serve as treasurer for Save Western Culture, but the two organizations report using the same private mailbox at the same UPS Store in Western Massachusetts as an address, and the two groups' bare bones websites utilize essentially the same design templates and privacy policies, suggesting they share a creator and the two organizations may be operated by the same individuals.

21. At the reason to believe stage, the Commission has previously concluded that the presence of certain information was indicative of a contribution in the name of another scheme, including a "close temporal proximity" between an entity's formation and the contribution in question. *See* Factual and Legal Analysis, MUR 7464 (LZP LLC) (June 10, 2021), *available at* https://www.fec.gov/files/legal/murs/7464/7464_21.pdf (finding that the "temporal proximity"

between an organization's formation and its first contribution to a political committee supported the conclusion that the organization was "likely created to effect a contribution" and was "not the true contributor," but was "instead, provided funds for the purpose of making the contribution"). The Commission has also found that a lack of activity preceding an alleged conduit contribution can support a reason to believe finding. *See Factual and Legal Analysis, MURs 7005, 7056* (Adam H. Victor, *et al.*) (Nov. 14, 2016), *available at* <https://www.fec.gov/files/legal/murs/7005/17044424111.pdf> (finding that the lack of contribution histories of alleged conduits supported a reason to believe that contributions had been made in the name of another).

22. If these violations were knowing and willful, they are subject to criminal penalties and should be referred to the Department of Justice for investigation. 52 U.S.C. §§ 30109(a)(5)(C), 30109(d)(1).

Count II

23. The FECA and FEC regulations also prohibit knowingly accepting a contribution made by one person in the name of another person and knowingly permitting one's name to be used to effect a contribution in the name of another person. 52 U.S.C. § 30122; 11 C.F.R. § 110.4(b). Relatedly, reporting entities must report the "true source" of their contributions. *United States v. Hsia*, 30 F. App'x 1, 3 (D.C. Cir. 2001); *see also* 52 U.S.C. § 30104(a), (b); 11 C.F.R. §§ 104.1, 104.2, 104.3, 104.8.

24. There is reason to believe that Save Western Culture and Mr. Martin knowingly accepted a contribution in the name of another, and that Stop China Now correspondingly knowingly permitted its name to be used to effect a contribution in the name of another, in violation of 52 U.S.C. § 30122 and 11 C.F.R. § 110.4(b). Specifically, Save Western Culture

accepted a \$1.6 million contribution ostensibly in the name of Stop China Now that both entities knew was actually made by an Unknown Respondent (or Respondents). Reason to believe is supported by the fact that Stop China Now's contribution to Save Western Culture was made just two weeks after Stop China Now was incorporated and one week after Save Western Culture was registered, and comprised the entirety of the funds Save Western Culture received. Furthermore, though the identity of the individuals involved with Stop China Now other than Mr. Martin are currently unknown, there are multiple indications that the organization is part of a political project with Save Western Culture and may be operated by the same people. Not only did Mr. Martin incorporate Stop China Now and serve as treasurer for Save Western Culture, but the two organizations report using the same private mailbox at the same UPS Store in Western Massachusetts as an address, and the two groups' bare bones websites utilize essentially the same design templates and privacy policies, suggesting they share a creator and the two organizations may be operated by the same individuals.

25. The Commission has previously found that the timing of a super PAC's formation and its first disbursement, in relation to the formation and first contribution of its sole contributor, supported a reason to believe that the super PAC and its treasurer, in their official capacity, knowingly accepted a contribution in the name of another. *See* Factual and Legal Analysis, MUR 7464 (Honor and Principles PAC) (June 10, 2021), *available at* https://www.fec.gov/files/legal/murs/7464/7464_20.pdf (finding the fact that a super PAC's registration with the Commission, its contributors' incorporation, the contributor's first contribution to the super PAC, and the super PAC's first independent expenditures all took place within a matter of days supported the inference that the super PAC may have been involved in the alleged conduit contribution scheme). The Commission has also previously found that there

was reason to believe a super PAC knowingly accepted and misreported a contribution in the name of another based on a super PAC official's involvement with both the super PAC and an entity that made a contribution in the name of another. *See* Factual and Legal Analysis, MUR 6920 (Now or Never PAC) (July 13, 2017), *available at* <https://www.fec.gov/files/legal/murs/6920/17044434515.pdf> (finding that a super PAC treasurer's role in both wiring funds from an LLC into a nonprofit organization and providing wiring instructions to the nonprofit for making a contribution to the super PAC supported a reason to believe that the super PAC knowingly accepted a contribution in the name of another).

26. At all relevant times, Seth Martin served as treasurer to Save Western Culture.

27. Under the FECA, treasurers of political committees like Save Western Culture are responsible for filing accurate disclosure reports as required. 52 U.S.C. § 30104(a); *Treasurer's liability*, FEC (Aug. 11, 2011), <https://www.fec.gov/updates/treasurers-liability/>.

28. A political committee treasurer is personally liable for a failure by the political committee to file required reports. *Id.*; Statement of Policy Regarding Treasurers Subject to Enforcement Proceedings, 70 Fed. Reg. 3, 5 (Jan. 3, 2005)..

29. By permitting Save Western Culture to accept a contribution in the name of another and to file a report to the FEC falsely identifying the true source of a contribution, Mr. Martin personally violated 52 U.S.C. § 30122 and 11 C.F.R. § 110.4(b).

30. Given Mr. Martin's role in both organizations, acting as treasurer to the recipient political committee and having incorporated the conduit nonprofit, as well as the close relationship between the two entities and the facts as alleged above that indicated the transfer was an unlawful conduit contribution, there is reason to believe Mr. Martin at least recklessly

failed to fulfill the duties imposed on treasurers by the Act or he has intentionally deprived himself of the operative facts giving rise to a violation.

31. If these violations were knowing and willful, they are subject to criminal penalties and should be referred to the Department of Justice for investigation. 52 U.S.C. §§ 30109(a)(11), 30109(d)(1).

Count III

32. Alternatively, it appears Stop China Now used Save Western Culture as a conduit to make independent expenditures and correspondingly failed to report independent expenditures and disclose its contributors as required by 52 U.S.C. § 30104(c) and 11 C.F.R. § 109.10.

33. The FECA imposes disclosure obligations on any entity that makes over \$250 worth of independent expenditures in a calendar year. 52 U.S.C. § 30104(c). Such entities must provide information about at least some of the contributions they receive. First, they must “identif[y] . . . each . . . person . . . who makes a contribution to the reporting committee during the reporting period, whose contribution or contributions have an aggregate amount or value in excess of \$200 within the calendar year . . . together with the date and amount of any such contribution.” *Id.* §§ 30104(c)(1), 30104(b)(3)(A). Second, such entities must disclose “each person who made a contribution in excess of \$200 . . . for the purpose of furthering an independent expenditure.” *Id.* § 30104(c)(2)(C); *Citizens for Resp. & Ethics in Wash. v. Fed. Election Comm’n*, 316 F. Supp. 3d 349 (D.D.C. 2018), *aff’d*, 971 F.3d 340 (D.C. Cir. 2020).

34. In contrast to making an expenditure, FEC regulations provide that one makes a contribution “when the contributor relinquishes control over the contribution.” 11 C.F.R. § 110.1(b)(6); *see also* 52 U.S.C. § 30116(a)(8) (“[C]ontributions which are in any way earmarked or otherwise directed through an intermediary or conduit to [a] candidate, shall be treated as

contributions from such person to such candidate.”). Consequently, if a contributor does not relinquish control, but rather exercises control over the ultimate expenditure or provides the funds with directions on its eventual expenditure, the contributor has not made a contribution, but has rather made the expenditure. *Cf. United States v. O’Donnell*, 608 F. 3d 546, 550, 554 (9th Cir. 2010) (“To identify the individual who has made the [transaction], we must look past the intermediary’s essentially ministerial role to the substance of the transaction” and “it is implausible that Congress, in seeking to promote transparency, would have understood the relevant [actor to be reported] to be the intermediary who merely transmitted the [funds]”); 11 C.F.R. § 110.11(c)(4)(i) (requiring, as identification of who made the independent expenditure, a disclaimer identifying who “is responsible for the content of this advertising”); *cf. also* FEC Advisory Op. 2008-10 (VoterVoter.com) (Oct. 24, 2008) (finding intermediary company that causes independent expenditure to air nonetheless does not “mak[e]” the ad where it did not exercise control over the ad).


35. As alleged above, Stop China Now was Save Western Culture’s sole funder and the two entities likely have overlapping personnel. Save Western Culture converted Stop China Now’s funds into independent expenditures within days of receipt, indicating Save Western Culture did not exercise independent control over the spending of the funds.

36. Accordingly, there is reason to believe Stop China Now used Save Western Culture as a conduit and that the independent expenditures were actually made by Stop China Now. Nevertheless, Stop China Now did not report making any independent expenditures and failed to disclose its contributors, in violation of 52 U.S.C. § 30104(c) and 11 C.F.R. § 109.10.

37. If these violations were knowing and willful, they are subject to criminal penalties and should be referred to the Department of Justice for investigation. 52 U.S.C. §§ 30109(a)(11), 30109(d)(1).

Conclusion

WHEREFORE, Citizens for Responsibility and Ethics in Washington requests that the FEC conduct an investigation into these allegations; declare the respondents to have violated the FECA and applicable FEC regulations; and order respondents to correct these violations by amending Save Western Culture's disclosures to identify and make public the source(s) of the contribution to the PAC. In addition, respondents request that the FEC impose sanctions appropriate to these violations and take such further action as may be appropriate, including referring this case to the Department of Justice for criminal prosecution.



ON BEHALF OF COMPLAINANT
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VERIFICATION

Citizens for Responsibility and Ethics in Washington hereby verifies that the statements made in the attached Complaint are, upon information and belief, true. Sworn pursuant to 18 U.S.C. § 1001.

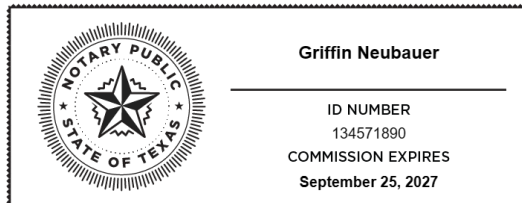


Adam Rappaport

Sworn to and subscribed before me this 17th day of December, 2024.



Notary Public Texas Denton County



Electronically signed and notarized online using the Proof platform.