

BEFORE THE FEDERAL ELECTION COMMISSION

CAMPAIGN LEGAL CENTER
ROGER G. WIEAND
1101 14th Street NW, Suite 400
Washington, DC 20005

v. MUR No. _____

STOP CHINA NOW, INC.
21 Mohawk Trl. PMB 197
Greenfield, MA 01301

SAVE WESTERN CULTURE and
SETH MARTIN in his official capacity
as treasurer
21 Mohawk Trl. PMB 197
Greenfield, MA 01301

ANY UNKNOWN PERSON(S)
who made a contribution to Save Western
Culture in the name of Stop China Now, Inc.

COMPLAINT

1. During the final weeks before the 2024 election, unknown individuals appear to have used Stop China Now, Inc. (“SCN”), a Delaware corporation formed on October 3, 2024, as a “straw donor”—an intermediary person or entity used to funnel contributions to conceal the identity of the true contributor—to make a \$1.6 million contribution to a super PAC on October 17, 2024. This super PAC, Save Western Culture (“SWC PAC”), was organized on October 11, 2024—just six days before the reported contribution from SCN, which was its only source of funding—and shares a mailing address with SCN. Overall, these facts indicate that the super PAC and the apparent straw donor were organized by the same unknown person(s) for the purpose of unlawfully concealing the true source(s) of this \$1.6 million contribution, which was used to make over \$1.3 million in independent expenditures during the final weeks before the 2024 election.

2. There is no publicly available information indicating that SCN conducted any business or other activity between its formation and the seven-figure contribution made in its name, from which it could have generated sufficient funds to contribute \$1.6 million without someone (*i.e.*, the true contributor) transferring funds to SCN for that purpose. As such, there is reason to believe SCN was not the true source of the funds contributed in its name, and was instead established and used as a straw donor by one or more unknown persons to contribute \$1.6 million while concealing the true contributors' identities.
3. Moreover, the overall record—including that SCN appears to have been incorporated by SWC PAC's treasurer, the shared address between SCN and SWC PAC, the extremely close temporal proximity of the two entities' formation, the fact that SCN provided all of SWC PAC's funds, and the fact that SCN and SWC PAC appear to have been created by the same individual(s) in an effort to conceal the true source(s) of a large political contribution—indicates that SWC PAC knowingly accepted a contribution in the name of another.
4. The overall record likewise indicates that the entities and unknown individuals engaged in this straw donor scheme appear to have violated the Federal Election Campaign Act ("FECA") knowing that their actions were unlawful. Accordingly, there is reason to believe that SCN, SWC PAC, and the unknown true contributors knowingly and willfully violated 52 U.S.C. § 30122.
5. This complaint is filed pursuant to 52 U.S.C. § 30109(a)(1) and is based on information and belief that SCN, SWC PAC, and any persons that created, operated, or made contributions in the name of SCN, violated FECA, 52 U.S.C. § 30101, *et seq.* "If the Commission, upon receiving a complaint . . . has reason to believe that a person has

committed, or is about to commit, a violation of [FECA] . . . [t]he Commission *shall make an investigation* of such alleged violation.”¹

FACTUAL BACKGROUND

6. Stop China Now, Inc. (“SCN”) was organized in Delaware as an exempt corporation on October 3, 2024, and its registered agent is the Corporation Trust Company.²
7. SCN appears to have little to no discernible public footprint:
 - a. Searches on Google provide no results that originate from “Stop China Now Inc.” itself or that detail any activity by “Stop China Now Inc.” The only relevant results relate solely to the contribution at issue in this complaint.
 - b. “Stop China Now, Inc.” does not appear to have any account or page on Instagram or X (formerly known as Twitter).
 - c. There is no record of “Stop China Now” in searches with the Better Business Bureau,³ Bloomberg,⁴ EDGAR,⁵ or the Franklin County Chamber of Commerce—the local chamber of commerce for the Massachusetts address associated with SCN.⁶
 - d. SCN does appear to have a website, but it is essentially comprised of a single webpage articulating its “Mission” and “Positions,” and it does not indicate that the group is engaged in any business activity or other means of generating

¹ 52 U.S.C. § 30109(a)(2) (emphasis added); *see also* 11 C.F.R. § 111.4(a).

² “Stop China Now, Inc.,” Entity Details, DE Dep’t of State: Div. of Corps. (attached as Exhibit A).

³ *See* Better Business Bureau, <https://www.bbb.org/search/> (last visited Dec. 13, 2024).

⁴ *See* Bloomberg, Company Search, <https://www.bloomberg.com/> (last visited Dec. 13, 2024).

⁵ U.S. Securities and Exchange Commission, EDGAR, <https://www.sec.gov/edgar/search/> (last visited Dec. 13, 2024).

⁶ Franklin County Chamber, Member Directory Search for “Stop China Now,” <https://chamber.franklincc.org/list/search?q=%22stop+china+now%22&c=&sa=False> (last visited Dec. 13, 2024).

income, nor does the page list any associated members.⁷ The website’s domain, “stopchinanow.org,” was registered on September 30, 2024,⁸ *i.e.* three days before SCN’s Delaware incorporation. Additionally, there is a Facebook page for a “political organization” called “Stop China Now” that was created on the same day, October 17, 2024, that the contribution was made. The page does not have any followers or activity, nor does it list any information about the corporation.⁹

8. SCN’s certificate of incorporation indicates that it is a nonprofit corporation that was incorporated by “Seth Martin,” whose mailing address is “21 Mohawk Trail, PMB 197, Greenfield, MA 01301”—the same address used by SWC PAC, and reported as SCN’s address in connection with the contribution at issue.¹⁰
9. On October 11, 2024, Save Western Culture (“SWC PAC”) registered as an independent-expenditure only political committee (a “super PAC”) and Seth Martin is its treasurer.¹¹ SWC PAC reported a United Parcel Service (“UPS”) Store in Greenfield, MA as its mailing address.¹²
10. SWC PAC reported receiving a contribution of \$1,600,000 from SCN six days later, on October 17, 2024.¹³ The address provided in connection with the contribution was that of

⁷ Stop China Now, <https://stopchinanow.org/#> (attached as Exhibit B) (last visited Dec. 13, 2024). The address listed on the website’s privacy policy is the same 21 Mohawk Trl. address used in connection with the contribution. *See* Privacy Policy, Stop China Now, <https://stopchinanow.org/#privacy> (last visited Dec. 13, 2024).

⁸ *See* ICANN Lookup, <https://lookup.icann.org/en/lookup> (last visited December 13, 2024) (search for “stopchinanow.org”) (attached as Exhibit C).

⁹ Stop China Now, Facebook, <https://www.facebook.com/profile.php?id=61567094587950> (last visited Dec. 13, 2024).

¹⁰ Stop China Now, Inc., Certificate of Incorporation (attached as Exhibit D).

¹¹ Save Western Culture, Statement of Org. at 1 (Oct. 11, 2024), <https://docquery.fec.gov/pdf/562/202410119684872562/202410119684872562.pdf> (“SWC Statement of Org”).

¹² *See* The UPS Store Greenfield, <https://locations.theupsstore.com/ma/greenfield/21-mohawk-trl> (last visited Dec. 13, 2024).

¹³ Save Western Culture, FEC Form 3X, 2024 Post-Election Report at 6, <https://docquery.fec.gov/pdf/257/202412059720486257/202412059720486257.pdf> (“SWC Post-Election Rpt.”).

the same UPS Store in Greenfield, MA, even specifying the same personal mailbox listed by SWC PAC in its Statement of Organization.¹⁴ SWC PAC has reported receiving no other contributions or receipts.¹⁵

11. SWC PAC has reported making \$1,398,194.49 in independent expenditures, all of which were made between October 17, 2024 (*i.e.*, the date of SCN’s purported contribution) and November 1, 2024.¹⁶

SUMMARY OF THE LAW

12. FECA provides that “[n]o person shall make a contribution in the name of another person or knowingly permit his name to be used to effect such a contribution and no person shall knowingly accept a contribution made by one person in the name of another person.”¹⁷
13. The Commission regulation implementing the statutory prohibition provides the following examples of contributions in the name of another:
 - a. “Giving money or anything of value, all or part of which was provided to the contributor by another person (the true contributor) without disclosing the source of money or the thing of value to the recipient candidate or committee at the time the contribution is made.”
 - b. “Making a contribution of money or anything of value and attributing as the source of the money or thing of value another person when in fact the contributor is the source.”¹⁸

¹⁴ *Id.* A phone call to The UPS Store listed in Save Western Culture’s federal disclosure reports confirmed that the “PMB” in “21 Mohawk Trl. PMB 197” is short for “personal mailbox.”

¹⁵ SWC PAC, Raising, FEC, <https://www.fec.gov/data/committee/C00891135/?tab=raising> (last visited Dec. 13, 2024).

¹⁶ See Table of SWC PAC Independent Expenditures (attached as Exhibit E).

¹⁷ 52 U.S.C. § 30122.

¹⁸ 11 C.F.R. § 110.4(b)(2)(i)–(ii).

14. The requirement that a contribution be made in the name of its true source promotes Congress’s objective of ensuring the complete and accurate disclosure by candidates and committees of the political contributions they receive,¹⁹ and ensures that the public is fully informed about the true sources of political contributions and expenditures. Such transparency also enables voters, including complainant Wieand, to have the information necessary to evaluate candidates for office, “make informed decisions[,] and give proper weight to different speakers and messages.”²⁰
15. FECA and Commission regulations provide that a person who furnishes another with funds for the purpose of contributing to a candidate or committee “makes” the resulting contribution, whether funds are advanced to another person to make a contribution in that person’s name or promised as reimbursement of a solicited contribution.²¹ Moreover, the “key issue . . . is the source of the funds” and, therefore, the legal status of the funds when conveyed from a conduit to the ultimate recipient is “irrelevant to a determination of who ‘made’ the contribution for the purposes of [Section 30122].”²²
16. On April 1, 2016, then-Chair Petersen and then-Commissioners Hunter and Goodman issued a Statement of Reasons explaining their view regarding “the appropriate standard” to apply “in future matters” raising the allegation that an LLC was used to facilitate a

¹⁹ *United States v. O’Donnell*, 608 F.3d 546, 553 (9th Cir. 2010) (“[T]he congressional purpose behind [Section 30122]—to ensure the complete and accurate disclosure of the contributors who finance federal elections—is plain.”); *Mariani v. United States*, 212 F.3d 761, 775 (3d Cir. 2000) (rejecting constitutional challenge to section 30122 in light of the compelling governmental interest in disclosure).

²⁰ *Citizens United v. FEC*, 558 U.S. 310, 369–71 (2010).

²¹ See *United States v. Boender*, 649 F.3d 650, 660 (7th Cir. 2011) (holding that to determine who made a contribution “we consider the giver to be the source of the gift, not any intermediary who simply conveys the gift from the donor to the donee.”); *O’Donnell*, 608 F.3d at 550, 555; *Goland v. United States*, 903 F.2d 1247, 1251 (9th Cir. 1990) (“[FECA] prohibits the use of ‘conduits’ to circumvent . . . [reporting] restrictions.”).

²² *United States v. Whittemore*, 776 F.3d 1074, 1080 (9th Cir. 2015) (holding that defendant’s “unconditional gifts” to relatives and employees, along with the suggestion they contribute the funds to a specific political committee, violated Section 30122 because the source of the funds remained the individual who provided them to the putative contributors).

contribution in the name of another.²³ The Commissioners explained that in their view, “the proper focus in these matters is whether the funds used to make a contribution were intentionally funneled through a closely held corporation or corporate LLC for the purpose of making a contribution that evades the Act’s reporting requirements, making the individual, not the corporation or corporate LLC, the true source of the funds.”²⁴ The relevant factors that these Commissioners indicated they would consider included:

[whether] there is evidence indicating that the corporate entity did not have income from assets, investment earnings, business revenues, or bona fide capital investments, or was created and operated for the sole purpose of making political contributions. These facts would suggest the corporate entity is a straw donor and not the true source of the contribution.²⁵

17. An April 15, 2022, Statement of Reasons by then-Chairman Allen Dickerson, then-Vice Chair Steven T. Walther, and Commissioners Shana M. Broussard and Ellen L. Weintraub reiterated that the public is now on notice that FECA’s straw donor ban and Commission regulations implementing that provision — *i.e.*, the “conduit contribution rules” — apply when LLCs purport to make contributions to IEOPCs:

[T]he Commission [previously] did not agree whether, following *Citizens United* and *SpeechNow.org v. FEC*, respondent committees had received adequate notice that the Commission’s LLC reporting rules and conduit contribution rules applied to contributions made to the newly formed IEOPCs authorized by those judicial rulings. With the passage of time, IEOPCs have become a regular part of the campaign finance landscape, and adequate notice to the public now exists. Consequently, there is *no longer a lack of clarity* concerning the application of LLC

²³ Statement of Reasons of Chairman Matthew S. Petersen and Commissioners Caroline C. Hunter and Lee E. Goodman at 2, MURs 6485, 6487, 6488, 6711, 6930 (W Spann LLC, *et al.*) (Apr. 1, 2016), <https://www.fec.gov/files/legal/murs/6487/16044391129.pdf>.

²⁴ *Id.*

²⁵ *Id.* at 12.

reporting rules and conduit contribution rules in these circumstances.²⁶

Accordingly, the FEC has made clear that the public is “on notice” that the straw donor ban applies in such circumstances, and thus prohibits any person from funneling a contribution to an IEOPC through an LLC.

18. In MUR 7903, the Commission found reason to believe that “Tomfoolery LLC” and its single member, Thomas Chavez, violated Section 30122 when Chavez provided funds to the LLC for it to make contributions in its name to a super PAC; the Commission found that “Tomfoolery was not the true source of the combined \$75,000 that it facially appeared to give to [the super PAC], but instead served as an instrument to convey Chavez’s funds to [the super PAC] without publicly disclosing his identity.”²⁷ The Commission subsequently entered into a conciliation agreement with Tomfoolery LLC and Chavez, which included a \$25,000 civil penalty.²⁸
19. Straw donor contributions like those alleged here are serious violations of federal campaign finance law that have led to criminal indictments and convictions.²⁹ As explained in one such indictment, the straw donor ban works in tandem with other

²⁶ Statement of Reasons of Chairman Allen Dickerson, Vice Chair Steven T. Walther, Commissioner Shana M. Broussard, and Commissioner Ellen L. Weintraub at 2, MUR 7454 (Blue Magnolia Investments, LLC) (Apr. 15, 2022) (emphases added), https://www.fec.gov/files/legal/murs/7454/7454_36.pdf.

²⁷ Factual and Legal Analysis at 7, MUR 7903 (Tomfoolery LLC, *et al.*) (Aug. 1, 2022), https://www.fec.gov/files/legal/murs/7903/7903_13.pdf (“Tomfoolery F&LA”).

²⁸ See Conciliation Agreement ¶ VI, MUR 7903 (Tomfoolery LLC, *et al.*) (Oct. 3, 2022), https://www.fec.gov/files/legal/murs/7903/7903_16.pdf.

²⁹ See Colin Moynihan, *Lev Parnas, Ex-Giuliani Ally, Is Convicted of Campaign Finance Charges*, N.Y. Times (Oct. 22, 2021), <https://www.nytimes.com/2021/10/22/nyregion/lev-parnas-guilty-giuliani.html>; Dep’t of Justice, *Lev Parnas and Igor Fruman Charged with Conspiring to Violate Straw and Foreign Donor Bans* (Oct. 10, 2019), <https://www.justice.gov/usao-sdny/pr/lev-parnas-and-igor-fruman-charged-conspiring-violate-straw-and-foreign-donor-bans>; Dep’t of Justice, *Entertainer/Businessman and Malaysian Financier Indicted for Conspiring to Make and Conceal Foreign and Conduit Contributions During 2012 U.S. Presidential Election* (May 10, 2019), <https://www.justice.gov/opa/pr/entertainerbusinessman-and-malaysian-financier-indicted-conspiring-make-and-conceal-foreign>.

campaign finance laws to protect the integrity of our electoral system and to ensure that all candidates, campaign committees, federal regulators, and the public are informed of the true sources of money spent to influence federal elections.³⁰ Another indictment highlighted how straw donor schemes have been used to skirt FECA's source prohibitions, such as the ban on contributions by government contractors.³¹

20. Even for contributions that would otherwise be legal—*i.e.*, contributions that would not be prohibited or excessive, if made in the true contributor's own name—the prohibition of contributions in the name of another serves FECA's core transparency purposes by ensuring that voters have access to complete and accurate information regarding the sources of electoral contributions.

CAUSE OF ACTION

COUNT I:

SCN, SWC PAC, AND THE UNKNOWN PERSON(S) WHO CONTRIBUTED TO SWC PAC IN THE NAME OF SCN KNOWINGLY AND WILLFULLY VIOLATED 52 U.S.C. § 30122

21. The available information indicates that SCN did not have the means to contribute \$1.6 million without one or more other persons providing funds to SCN for that purpose, such that these unknown other persons were, in fact, the true source(s) of the contribution to SWC PAC made in SCN's name.
22. SCN was registered as a Delaware corporation on October 3, 2024.³² Just two weeks after its formation, SCN purported to make a \$1.6 million contribution to a super PAC, despite

³⁰ Grand Jury Indictment, *United States v. Lev Parnas, et al.*, Cr. No. 19-725 (S.D.N.Y. Oct. 10, 2019), <https://www.justice.gov/usao-sdny/press-release/file/1208281/download>.

³¹ Dep't of Justice, *Former Government Contractor Executives Indicted for Unlawful Campaign Contributions* (Feb. 10, 2022), <https://www.justice.gov/opa/pr/former-government-contractor-executives-indicted-unlawful-campaign-contributions>; see Dep't of Justice, *Former Government Contractor Executive Pleads Guilty to Unlawful Campaign Contributions* (Sept. 27, 2022), <https://www.justice.gov/opa/pr/former-government-contractor-executive-pleads-guilty-unlawful-campaign-contributions>.

³² See Exh. A.

having engaged in no commercial or other activity from which SCN could have generated sufficient funds to make political contributions in its own name.

23. During the two-week period between its formation and the \$1.6 million contribution made in its name, SCN does not appear to have engaged in any activity from which it could have garnered the funds with which to make this seven-figure contribution—absent being provided sufficient funds by one or more other persons, the true contributor(s). Indeed, SCN appears to exist primarily on paper, as well as through a bare-bones presence online that does not indicate it generates or raises money. Nor is there any news article or public record that provides any information about its activities beyond the contribution at issue.³³
24. As such, SCN appears to have engaged in no activity between the date of its formation and the date of the \$1.6 million contribution made in its name. It is utterly implausible that a nascent, two-week-old entity with no income-generating activity could have acquired sufficient funds to enable it to make a \$1.6 million contribution in its own name, with its own funds. Thus, SCN appears to have “lacked the financial wherewithal to make the [\$1,600,000] contribution to [the Committee] on its own.”³⁴
25. The use of a straw donor, such as the opaque and obscure Delaware corporation at issue, to effectively act as a clearinghouse for the contribution(s) of other person(s)—whose identities thereby remain concealed from the public—fundamentally undermines the basic transparency required under FECA, which is essential to empower voters to participate in elections with full knowledge of who is spending money to influence their vote and to protect elections against real or apparent corruption.

³³ See *supra* ¶ 7.

³⁴ Tomfoolery F&LA at 5.

26. Accordingly, based on the foregoing, there is reason to believe that the unidentified person(s) who contributed \$1,600,000 to SWC PAC in the name of SCN violated 52 U.S.C. § 30122 by making a contribution in the name of another, and that SCN violated 52 U.S.C. § 30122 by knowingly permitting its name to be used to effect the contribution of one or more other persons in its own name.
27. Furthermore, the available information supports finding reason to believe that SWC PAC violated 52 U.S.C. § 30122 by knowingly accepting a \$1.6 million contribution in the name of another. SWC PAC listed the same “personal mailbox” on its Statement of Organization as the mailing address it disclosed in connection with the contribution from SCN.³⁵ SCN also appears to have been incorporated by the same person, Seth Martin, who serves as SWC PAC’s treasurer, and who shares the same address—21 Mohawk Trail, PMB 197, Greenfield, MA 01301—as SCN and SWC PAC.³⁶
28. In light of these facts, along with the extraordinarily short timeframe between the formation of SCN and SWC PAC, and the contribution at issue—all three events took place within a two-week period—as well as the fact that SCN was the sole source of funding for SWC PAC, the overall record supports finding reason to believe that both entities were created by the same individual(s) in an effort to conceal the true source(s) of the \$1.6 million contribution, and thus that SWC PAC accepted this contribution knowing that SCN was not the true contributor, in violation of 52 U.S.C. § 30122.

* * *

29. Furthermore, the facts of this matter support finding reason to believe the aforementioned violations of FECA were knowing and willful.

³⁵ See SWC Statement of Org. at 1, *supra* note 11; SWC Post-Election Rpt. at 6, *supra* note 13.

³⁶ Exh. D, *supra* note 10.

30. A violation of FECA is knowing and willful when the “acts were committed with full knowledge of all the relevant facts and a recognition that the action is prohibited by law.”³⁷ This standard does not require proving knowledge of the specific statute or regulation a person violated.³⁸ Rather, it is sufficient to demonstrate that a respondent “acted voluntarily and was aware that his conduct was unlawful.”³⁹ This awareness may be shown through circumstantial evidence, such as a person’s efforts to disguise their actions.⁴⁰
31. In the context of straw donor violations, at least one federal court has emphasized that the knowing-and-willful standard is not meant to be exceedingly difficult; it is simply geared at drawing a line between “law-abiding citizens who might inadvertently violate the law” and those engaging in “wrongful conduct.”⁴¹ Particularly when evidence indicates that a recipient knew the true source of the contribution when it accepted and misreported the conduit as the source, there is little “risk that criminal penalties will be imposed on the basis of innocent conduct.”⁴²
32. Here, the factual record strongly suggests that SCN, SWC PAC, and those who anonymously funded SCN acted intentionally to violate FECA’s disclosure laws and attempted to obscure their unlawful activities from public detection.
33. Critically, less than a month passed between all the events at issue. The same person, Seth Martin, appears to have incorporated SCN and serves as SWC PAC’s treasurer, and

³⁷ 122 Cong. Rec H3778 (daily ed. May 3, 1976).

³⁸ See *United States v. Danielczyk*, 917 F. Supp. 2d 573, 579 (E.D. Va. 2013).

³⁹ *Id.*

⁴⁰ *United States v. Hopkins*, 916 F.2d 207, 213–15 (5th Cir. 1990).

⁴¹ *Danielczyk*, 917 F. Supp. 2d at 579–80 (internal quotation marks omitted).

⁴² *Id.*

Martin appears to share a mailing address with SCN and SWC PAC.⁴³ Unknown persons funded SCN, organized SWC PAC, and moved \$1.6 million from SCN to SWC PAC, and SWC PAC ran all of its independent expenditures in a little less than 30 days.⁴⁴ The timing and highly coordinated nature of these events strongly indicates that those funding and operating SCN and SWC PAC planned their activities for the precise purpose of allowing unknown contributor(s) to influence federal elections without their identities becoming public.

34. Two additional details solidify that those behind the scheme were engaging in “wrongful conduct” and did not mistakenly violate the law:⁴⁵ SCN and SWC PAC share an address—down to the mailbox number—and SCN was SWC PAC’s *only* contributor.⁴⁶ On the basis of this information, there can be little doubt that SCN and SWC PAC were created by the same people, in tandem, for the purpose of funneling one or more individuals’ money into federal elections while evading the reporting requirements.
35. Further, given these circumstances, SCN and SWC PAC must have known that the true source of the funds was not SCN, yet SWC PAC did not disclose the true sources of the funds, providing further evidence of knowing and willful intent.⁴⁷
36. Finally, those behind the straw donor scheme sought to minimize their public footprint and evade identification by registering SCN in a jurisdiction that does not require robust corporate disclosure and by using a UPS Store as the address for SCN and SWC PAC, ensuring that neither entity was connected to a residential or business address that could

⁴³ Exh. D, *supra* note 10.

⁴⁴ See Exhs. A, E; SWC Statement of Org. at 1, *supra* note 11; SWC Post-Election Rpt. at 6, *supra* note 13.

⁴⁵ See *Danielczyk*, 917 F. Supp. 2d at 579.

⁴⁶ See SWC Statement of Org. at 1, *supra* note 11; SWC Post-Election Rpt. at 6, *supra* note 12; SWC PAC, Raising, *supra* note 15.

⁴⁷ See *Danielczyk*, 917 F. Supp. 2d at 579.

be traced to an individual using public tools.⁴⁸ While the goal of a straw-donor scheme—by the very nature of the violation—is to cover up the true source of a contribution, the respondents here appear to have taken additional steps to conceal the identities of all involved.

37. Because the totality of the facts indicates that SCN, SWC PAC, and those who contributed to SWC PAC in the name of SCN acted “with full knowledge of all the relevant facts and a recognition that [their actions were] prohibited by law,”⁴⁹ the Commission should find reason to believe their violations of 52 U.S.C. § 30122 were knowing and willful.

⁴⁸ See Exh. A (providing no ownership or financing information); The UPS Store Greenfield, *supra* note 12.

⁴⁹ *Danielczyk*, 917 F. Supp. 2d at 579.

PRAYER FOR RELIEF

38. Wherefore, the Commission should find reason to believe that SCN, SWC PAC, and any person(s) who made contributions to SWC PAC in the name of SCN, have violated 52 U.S.C. § 30101 *et seq.*, and conduct an immediate investigation under 52 U.S.C. § 30109(a)(2).
39. Further, the Commission should seek appropriate sanctions for any and all violations, including civil penalties sufficient to deter future violations and an injunction prohibiting the respondents from any and all violations in the future, and should seek such additional remedies as are necessary and appropriate to ensure compliance with FECA.

Respectfully submitted,

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Counsel to the Campaign Legal Center,
Roger G. Wieand


December 16, 2024

VERIFICATION

The complainants listed below hereby verify that the statements made in the attached Complaint are, upon their information and belief, true.


Sworn pursuant to 18 U.S.C. § 1001.

For Complainant Roger G. Wieand


12/16/2024
Roger G. Wieand

Virginia Prince William county

Sworn to and subscribed before me this 16th day of December 2024. by
Roger G Wieand



Notary Public



Notarized remotely online using communication technology via Proof.

VERIFICATION

The complainants listed below hereby verify that the statements made in the attached Complaint are, upon their information and belief, true.

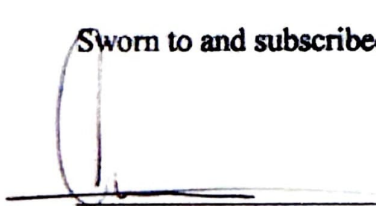
Sworn pursuant to 18 U.S.C. § 1001.

For Complainant Campaign Legal Center



Saurav Ghosh, Esq.

Sworn to and subscribed before me this 16th day of December 2024.



Notary Public



EXHIBIT A

Department of State: Division of Corporations

[Allowable Characters](#)

HOME

Entity Details

THIS IS NOT A STATEMENT OF GOOD STANDING

[File Number:](#) **5390228** [Incorporation Date / Formation Date:](#) **10/3/2024**
 (mm/dd/yyyy)

[Entity Name:](#) **STOP CHINA NOW, INC.**

[Entity Kind:](#) **Corporation** [Entity Type:](#) **Exempt**

[Residency:](#) **Domestic** State: **DELAWARE**

[REGISTERED AGENT INFORMATION](#)

Name: **THE CORPORATION TRUST COMPANY**

Address: **CORPORATION TRUST CENTER 1209 ORANGE ST**

City: **WILMINGTON** County: **New Castle**

State: **DE** Postal Code: **19801**

Phone: **302-658-7581**

Additional Information is available for a fee. You can retrieve Status for a fee of \$10.00 or more detailed information including current franchise tax assessment, current filing history and more for a fee of \$20.00.

Would you like Status Status, Tax & History Information

Submit

View Search Results

New Entity Search

For help on a particular field click on the Field Tag to take you to the help area.

EXHIBIT B



> Our Mission

Stop China Now opposes the influence of Communist governments in American public policy.

> Our Positions

- ★ Stop Chinese influence of American policies
- ★ Protect American jobs and industry
- ★ Protect American consumers

> Stop Jobs & Cash Going to China

Our leaders should be creating jobs for Americans, not subsidizing and outsourcing them to China.

> Take Action

Contact your representatives in Congress

Join us!

JOIN



By providing your phone number, you agree to receive text messages from Stop China Now. Message & data rates may apply. Message frequency varies. Reply STOP to opt-out.

[Privacy Policy](#)

Paid for by Stop China Now

info@stopchinanow.org

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EXHIBIT C

Registration data lookup tool

Enter a domain name or an Internet number resource (IP Network or ASN)

[Frequently Asked Questions \(FAQ\)](#)
(/en/faq)

Lookup

By submitting any personal data, I acknowledge and agree that the personal data submitted by me will be processed in accordance with the ICANN [Privacy Policy](https://www.icann.org/privacy/policy) (https://www.icann.org/privacy/policy), and agree to abide by the website [Terms of Service](https://www.icann.org/privacy/tos) (https://www.icann.org/privacy/tos) and the [registration data lookup tool Terms of Use](#) (unsafe:javascript:void(0)).

For additional information on ICANN Accredited Registrars including website and contact information, please visit <https://www.icann.org/en/accredited-registrars> (https://www.icann.org/en/accredited-registrars).

If the registration data you are seeking is not provided in the lookup results, please use the [Registration Data Request Service \(RDRS\)](#) (https://rdrs.icann.org/) to submit a request for nonpublic registration data. RDRS is intended for use by requestors with a legitimate interest in accessing nonpublic registration data.

Domain Information

Name: stopchinanow.org

Internationalized Domain Name: stopchinanow.org

Registry Domain ID: e9987d728715425293f3bb790af29ab8-LROR

Domain Status:

[clientDeleteProhibited](https://icann.org/epp#clientDeleteProhibited) (https://icann.org/epp#clientDeleteProhibited)
[clientRenewProhibited](https://icann.org/epp#clientRenewProhibited) (https://icann.org/epp#clientRenewProhibited)
[clientTransferProhibited](https://icann.org/epp#clientTransferProhibited) (https://icann.org/epp#clientTransferProhibited)
[clientUpdateProhibited](https://icann.org/epp#clientUpdateProhibited) (https://icann.org/epp#clientUpdateProhibited)

Nameservers:

dns1.registrar-servers.com
dns2.registrar-servers.com

Dates

Registry Expiration: 2026-09-30 17:13:39 UTC

Updated: 2024-12-10 17:11:25 UTC

Created: 2024-09-30 17:13:39 UTC

Contact Information

Registrant:

Handle: 1

Name: Registration Private

Organization: Domains By Proxy, LLC

Phone: tel:+1.4806242599

Kind: individual

Mailing Address: DomainsByProxy.com 100 S. Mill Ave, Suite 1600, Tempe, Arizona, 85281

ISO-3166 Code: US

Contact Uri: <https://www.godaddy.com/whois/results.aspx?domain=stopchinanow.org> (<https://www.godaddy.com/whois/results.aspx?domain=stopchinanow.org>)

Technical:

Handle: 3

Name: Registration Private

Organization: Domains By Proxy, LLC

Phone: tel:+1.4806242599

Kind: individual

Mailing Address: DomainsByProxy.com 100 S. Mill Ave, Suite 1600, Tempe, Arizona, 85281

ISO-3166 Code: US

Contact Uri: <https://www.godaddy.com/whois/results.aspx?domain=stopchinanow.org> (<https://www.godaddy.com/whois/results.aspx?domain=stopchinanow.org>)

Registrar Information

Name: GoDaddy.com, LLC

IANA ID: 146

Abuse contact email: abuse@godaddy.com

Abuse contact phone: tel:480-624-2505

Authoritative Servers

Registry Server URL: <https://rdap.publicinterestregistry.org/rdap/domain/stopchinanow.org> (<https://rdap.publicinterestregistry.org/rdap/domain/stopchinanow.org>)

Last updated from Registry RDAP DB: 2024-12-10T23:35:39.506Z

Registrar Server URL: <https://rdap.godaddy.com/v1/domain/stopchinanow.org> (<https://rdap.godaddy.com/v1/domain/stopchinanow.org>)

Last updated from Registrar RDAP DB: 2024-12-10T23:35:39.506Z

Notices and Remarks

Notices:

Status Codes

For more information on domain status codes, please visit <https://icann.org/epp>

<https://icann.org/epp> (<https://icann.org/epp>)

RDDS Inaccuracy Complaint Form

URL of the ICANN RDDS Inaccuracy Complaint Form: <https://www.icann.org/wicf>

<https://icann.org/wicf> (<https://icann.org/wicf>)

Terms of Use

By submitting an inquiry, you agree to these Universal Terms of Service and limitations of warranty. In particular, you agree not to use this data to allow, enable, or otherwise make possible, dissemination or collection of this data, in part or in its entirety, for any purpose, such as the transmission of unsolicited advertising and solicitations of any kind, including spam. You further agree not to use this data to enable high volume, automated or robotic electronic processes designed to collect or compile this data for any purpose, including mining this data for your own personal or commercial purposes, or use this data in any way that violates applicable laws and regulations.

<https://www.godaddy.com/agreements/showdoc?pageid=5403> (<https://www.godaddy.com/agreements/showdoc?pageid=5403>)



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Newletters (<https://www.icann.org/resources/pages/global-newsletter-2018>)



Community Wiki (<https://community.icann.org/>)



ICANN Blog (<https://www.icann.org/news/blog>)

WHO WE ARE

CONTACT US

**ACCOUNTABILITY AND
TRANSPARENCY**

GOVERNANCE

HELP

DATA PROTECTION

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We have updated our privacy policies and certain website terms of service to provide greater transparency, promote simplification, and align with recent changes in privacy laws applicable to us. [Learn more \(https://www.icann.org/privacy\)](https://www.icann.org/privacy).

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EXHIBIT D

State of Delaware
Secretary of State
Division of Corporations
Delivered 03:50 PM 10/03/2024
FILED 03:50 PM 10/03/2024
SR 20243861098 - File Number 5390228

**CERTIFICATE OF INCORPORATION OF
STOP CHINA NOW, INC.
A NONSTOCK CORPORATION**

I, the undersigned, for the purpose of creating and organizing a nonprofit nonstock corporation under the provisions of and subject to the requirements of the General Corporation Law of the State of Delaware (the "DGCL"), certify as follows:

1. The name of the corporation is Stop China Now, Inc. (the "Corporation").
2. The Registered Office of the corporation in the State of Delaware is located at 1209 Orange Street, Wilmington, DE, 19801, New Castle County, DE. The name of the Registered Agent at such address upon whom process against this corporation may be served is The Corporation Trust Company.
3. The Corporation is organized, and shall at all times be operated, exclusively to promote social welfare within the meaning of Code Section 501(c)(4), including, but not limited to, including, but not limited to, engaging in communications and other activities to make the general public aware of the public policy positions of certain public officials related to the American democratic process so that members of the general public can make informed decisions about their civic engagement.
4. The Corporation is not organized for profit, and no part of the net earnings of this corporation shall inure to the benefit of any member of the Board of Directors or any other individual except that the Corporation may make payments of reasonable compensation for services rendered.
5. The Corporation shall not participate or intervene in any political campaign on behalf of, or in opposition to, any candidate for public office to an extent that would disqualify it from tax exemption under Code Section 501(c)(4).
6. The Corporation shall never be operated for the primary purpose of carrying on a trade or business for profit. Notwithstanding any provision of this Certificate of Incorporation, this Corporation shall not carry on any activities not permitted to be carried on by an organization exempt from federal income tax under Code Section 501(c)(4).
7. The director(s) on the Corporation's board of directors shall be the only member(s) of the Corporation.
8. To the fullest extent permitted by law, a director or officer of the Corporation shall not be personally liable to the Corporation or to its members for monetary damages for any breach of fiduciary duty as a director or officer. No amendment to, modification of, or repeal of this Paragraph 8 shall apply to or have any effect on the liability or alleged liability of any director or officer of the Corporation for or with respect to any acts or omissions of such director or officer occurring prior to such amendment.
9. The Corporation shall not have any capital stock.
10. The Corporation should have perpetual existence until it is dissolved in accordance with the DGCL.
11. Upon the dissolution of the Corporation, the Board of Directors shall, after paying or making provisions for the payment of all of the liabilities of the Corporation, dispose of all of the assets of the Corporation to one or more organizations that are tax exempt under Code sections 501(c)(3) or 501(c)(4). Any such assets not so disposed of shall be disposed of by the Circuit Court for the County in

which the principal office of the Corporation is located to one or more organizations that are tax exempt under Code sections 501(c)(3) or 501(c)(4), as designated by said court.

12. The name and mailing address of the incorporator are as follows:

Name:	Seth Martin
Mailing Address:	21 Mohawk Trail, PMB 197 Greenfield, MA 01301

13. In furtherance and not in limitation of the powers conferred by statute, the board of directors is expressly authorized to adopt, amend, or repeal Bylaws or adopt new Bylaws without any action on the part of the members; provided that any Bylaw adopted or amended by the board of directors, and any powers thereby conferred, may be amended, altered, or repealed by the members.

I, THE UNDERSIGNED, being the incorporator, for the purpose of forming a corporation pursuant to the DGCL, do make this Certificate of Incorporation, hereby acknowledging, declaring, and certifying that the foregoing Certificate of Incorporation is my act and deed and that the facts herein stated are true, and have accordingly hereunto set my hand this 2nd day of October 2024.

Signed by:

6CA4AE2E9544DA

Seth Martin, Incorporator

31860960.1

EXHIBIT E

Independent Expenditures Reported by Save Western Culture

Expenditure Date	Expenditure Amount	Candidate Name	Candidate Party	Support / Oppose	Candidate Office	Candidate Office State	Candidate Office District
10/17/24	\$ 16,066.88	Leah R. Dailey	Libertarian	Support	House	MI	7
10/17/24	\$ 13,389.07	Tom Bailey	Libertarian	Support	House	NC	1
10/17/24	\$ 117,823.79	Theodore E. Brown Jr.	Libertarian	Support	Senate	TX	N/A
10/17/24	\$ 91,045.66	Mike Scott	Libertarian	Support	Senate	MD	N/A
10/17/24	\$ 13,389.07	Laurie Buckhout	Republican	Oppose	House	NC	1
10/17/24	\$ 16,066.88	Thomas More Barrett	Republican	Oppose	House	MI	7
10/17/24	\$ 91,045.66	Larry Hogan	Republican	Oppose	Senate	MD	N/A
10/17/24	\$ 117,823.79	Rafael Edward "Ted" Cruz	Republican	Oppose	Senate	TX	N/A
10/24/24	\$ 14,581.60	Robert Reid	Independent	Support	House	VA	2
10/24/24	\$ 4,500.00	Leah R. Dailey	Libertarian	Support	House	MI	7
10/24/24	\$ 18,696.63	Leah R. Dailey	Libertarian	Support	House	MI	7
10/24/24	\$ 2,750.00	Tom Bailey	Libertarian	Support	House	NC	1
10/24/24	\$ 12,231.40	Tom Bailey	Libertarian	Support	House	NC	1
10/24/24	\$ 18,349.12	Dennis Hayes	Libertarian	Support	House	MT	1
10/24/24	\$ 14,250.00	Theodore E. Brown Jr.	Libertarian	Support	Senate	TX	N/A
10/24/24	\$ 48,861.68	Juan Ciscomani	Republican	Oppose	House	AZ	6
10/24/24	\$ 27,928.40	Timothy Evans	Republican	Oppose	House	CO	8
10/24/24	\$ 16,437.40	Paul Junge	Republican	Oppose	House	MI	8
10/24/24	\$ 16,437.40	Paul Junge	Republican	Oppose	House	MI	8
10/24/24	\$ 2,750.00	Laurie Buckhout	Republican	Oppose	House	NC	1
10/24/24	\$ 12,231.40	Laurie Buckhout	Republican	Oppose	House	NC	1
10/24/24	\$ 46,406.10	Lori Chavez-Deremer	Republican	Oppose	House	OR	5
10/24/24	\$ 4,500.00	Thomas More Barrett	Republican	Oppose	House	MI	7
10/24/24	\$ 37,393.26	Thomas More Barrett	Republican	Oppose	House	MI	7

10/24/24	\$	18,696.63	Thomas More Barrett	Republican	Oppose	House	MI	7
10/24/24	\$	14,581.60	Jennifer Kiggans	Republican	Oppose	House	VA	2
10/24/24	\$	28,403.60	Mariannette Jane Miller-Meeks	Republican	Oppose	House	IA	1
10/24/24	\$	35,605.56	Marcus J. Molinaro	Republican	Oppose	House	NY	19
10/24/24	\$	28,494.80	Zach Nunn	Republican	Oppose	House	IA	3
10/24/24	\$	18,349.12	Ryan K Zinke	Republican	Oppose	House	MT	1
10/24/24	\$	22,259.68	Michael Vincent Lawler	Republican	Oppose	House	NY	17
10/24/24	\$	33,674.00	Rob Bresnahan	Republican	Oppose	House	PA	8
10/24/24	\$	14,250.00	Rafael Edward "Ted" Cruz	Republican	Oppose	Senate	TX	N/A
10/25/24	\$	6,250.00	Mike Scott	Libertarian	Support	Senate	MD	N/A
10/25/24	\$	6,250.00	Larry Hogan	Republican	Oppose	Senate	MD	N/A
10/29/24	\$	16,437.40	James Little	[Blank]	Support	House	MI	8
10/29/24	\$	16,066.88	Leah R. Dailey	Libertarian	Support	House	MI	7
10/29/24	\$	13,389.07	Tom Bailey	Libertarian	Support	House	NC	1
10/29/24	\$	13,389.07	Laurie Buckhout	Republican	Oppose	House	NC	1
10/29/24	\$	16,066.88	Thomas More Barrett	Republican	Oppose	House	MI	7
10/29/24	\$	34,454.00	Ryan Edward Mackenzie	Republican	Oppose	House	PA	7
10/30/24	\$	2,023.49	Robert Reid	Independent	Support	House	VA	2
10/30/24	\$	3,434.58	Sonja Feintech	Libertarian	Support	House	OR	5
10/30/24	\$	2,957.99	Leah R. Dailey	Libertarian	Support	House	MI	7
10/30/24	\$	4,500.00	Leah R. Dailey	Libertarian	Support	House	MI	7
10/30/24	\$	1,838.33	Tom Bailey	Libertarian	Support	House	NC	1
10/30/24	\$	2,750.00	Tom Bailey	Libertarian	Support	House	NC	1
10/30/24	\$	2,232.92	Dennis Hayes	Libertarian	Support	House	MT	1
10/30/24	\$	3,687.63	Theodore E. Brown Jr.	Libertarian	Support	Senate	TX	N/A
10/30/24	\$	14,250.00	Theodore E. Brown Jr.	Libertarian	Support	Senate	TX	N/A
10/30/24	\$	17,120.85	Mike Scott	Libertarian	Support	Senate	MD	N/A

10/30/24	\$	6,250.00	Mike Scott	Libertarian	Support	Senate	MD	N/A
10/30/24	\$	9,501.17	Juan Ciscomani	Republican	Oppose	House	AZ	6
10/30/24	\$	2,957.99	Paul Junge	Republican	Oppose	House	MI	7
10/30/24	\$	1,838.33	Laurie Buckhout	Republican	Oppose	House	NC	1
10/30/24	\$	2,750.00	Laurie Buckhout	Republican	Oppose	House	NC	1
10/30/24	\$	3,434.58	Lori Chavez-Deremer	Republican	Oppose	House	OR	5
10/30/24	\$	4,500.00	Thomas More Barrett	Republican	Oppose	House	MI	7
10/30/24	\$	2,023.49	Jennifer Kiggans	Republican	Oppose	House	VA	2
10/30/24	\$	7,513.71	Mariannette Jane Miller-Meeks	Republican	Oppose	House	IA	1
10/30/24	\$	9,075.30	Derrick F. Van Orden	Republican	Oppose	House	WI	3
10/30/24	\$	9,914.78	David Schweikert	Republican	Oppose	House	AZ	1
10/30/24	\$	7,726.77	Zach Nunn	Republican	Oppose	House	IA	3
10/30/24	\$	7,848.00	Donald J Bacon	Republican	Oppose	House	NE	2
10/30/24	\$	2,232.92	Ryan K Zinke	Republican	Oppose	House	MT	1
10/30/24	\$	8,828.72	John James	Republican	Oppose	House	MI	10
10/30/24	\$	17,120.85	Larry Hogan	Republican	Oppose	Senate	MD	N/A
10/30/24	\$	6,250.00	Larry Hogan	Republican	Oppose	Senate	MD	N/A
10/30/24	\$	3,687.63	Rafael Edward "Ted" Cruz	Republican	Oppose	Senate	TX	N/A
10/30/24	\$	14,250.00	Rafael Edward "Ted" Cruz	Republican	Oppose	Senate	TX	N/A
11/1/24	\$	3,039.42	Robert Reid	Independent	Support	House	VA	2
11/1/24	\$	5,158.97	Sonja Feintech	Libertarian	Support	House	OR	5
11/1/24	\$	3,354.00	Dennis Hayes	Libertarian	Support	House	MT	1
11/1/24	\$	9,514.26	Juan Ciscomani	Republican	Oppose	House	AZ	6
11/1/24	\$	5,158.97	Lori Chavez-Deremer	Republican	Oppose	House	OR	5
11/1/24	\$	3,039.42	Jennifer Kiggans	Republican	Oppose	House	VA	2
11/1/24	\$	11,286.10	Mariannette Jane Miller-Meeks	Republican	Oppose	House	IA	1

11/1/24	\$	13,631.72	Derrick F. Van Orden	Republican	Oppose	House	WI	3
11/1/24	\$	9,928.44	David Schweikert	Republican	Oppose	House	AZ	1
11/1/24	\$	11,606.13	Zach Nunn	Republican	Oppose	House	IA	3
11/1/24	\$	11,788.22	Donald J Bacon	Republican	Oppose	House	NE	2
11/1/24	\$	3,354.00	Ryan K Zinke	Republican	Oppose	House	MT	1
11/1/24	\$	13,261.33	John James	Republican	Oppose	House	MI	10