

BEFORE THE FEDERAL ELECTION COMMISSION

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

v. MUR No. _____

BUILDING OUR FUTURE TODAY, LLC
1802 Vernon St NW
PMB 2204
Washington, DC 20009

BADGER VALUES and LES WILLIAMSON
in his official capacity as treasurer
1305 W 11th St 217
Houston, TX 77008

PROGRESSIVE CENTURY PROJECT and
GARY BACKUS in his official capacity
as treasurer
3571 Far West Blvd #3388
Austin, TX 78731

ANY UNKNOWN PERSON(S)
who made a contribution to Badger Values
and/or Progressive Century Project in the
name of Building Our Future Today, LLC

COMPLAINT

1. In the final days before the 2024 election, one or more unknown individuals appear to have used Building Our Future Today, LLC (“BOFT”), a Delaware limited liability company (“LLC”) formed on August 8, 2024, in a “straw donor” scheme to unlawfully funnel \$2.59 million through BOFT to two super PACs while concealing the true contributors’ identities. The super PACs that received these contributions, Badger Values and Progressive Century Project (“PCP PAC”), were organized just weeks before Election Day, and were funded *exclusively* by BOFT — they reported receiving no

money from any other source. The overall facts therefore indicate that BOFT was organized for the purpose of unlawfully concealing the true source(s) of these contributions, and that the super PACs accepted \$2.59 million in contributions made in BOFT's name — which they used to make over \$2.4 million in independent expenditures — knowing that BOFT was not the true source of these contributions.

2. There is no publicly available information indicating that BOFT conducted any business or other activity between its formation and the millions of dollars in contributions made in its name from which it could have generated sufficient funds to make those contributions without someone (*i.e.*, the true contributor(s)) transferring funds to BOFT for that purpose. As such, there is reason to believe BOFT 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 \$2.59 million while concealing the true contributors' identities.
3. This complaint is filed pursuant to 52 U.S.C. § 30109(a)(1) and is based on information and belief that BOFT, Badger Values, PCP PAC, and any persons that created, operated, or made contributions in the name of BOFT, violated the Federal Election Campaign Act (“FECA” or the “Act”), 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

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

FACTUAL BACKGROUND

4. BOFT was organized in Delaware as an LLC on August 8, 2024. Its registered agent is the Corporation Trust Company,² and Joan E. Colleran, Esq. signed the LLC’s certificate of formation as its “authorized person.”³
5. BOFT appears to have little to no discernible public footprint:
 - a. Searches on Google provide no results that originate from “Building Our Future Today, LLC” itself or that detail any activity by “Building Our Future Today.” The only results that appear relevant to this LLC relate solely to the contributions at issue in this complaint.⁴
 - b. “Building Our Future Today, LLC” does not appear to have any account or page on Instagram or X (formerly known as Twitter).
 - c. There is no record of “Building Our Future Today” in searches with the Better Business Bureau,⁵ Bloomberg,⁶ EDGAR,⁷ or the DC Chamber of Commerce — the local chamber for the address associated with BOFT.⁸

² “Building Our Future Today, LLC,” Entity Details, DE Dep’t of State: Div. of Corps. (attached as Exhibit A).

³ “Building Our Future Today, LLC,” Certificate of Formation, DE Dep’t of State: Div. of Corps. (attached as Exhibit B).

⁴ The phrase “Building Our Future Today” is relatively common; a search for that exact phrase returns numerous results that do not appear to be relevant or in any way connected to the LLC or political contributions at issue.

⁵ See Better Business Bureau, <https://www.bbb.org/search/> (last visited Dec. 13, 2024).

⁶ See Bloomberg, Company Search, <https://www.bloomberg.com/> (last visited Dec. 13, 2024).

⁷ U.S. Securities and Exchange Commission, EDGAR, <https://www.sec.gov/edgar/search/> (last visited Dec. 13, 2024).

⁸ DC Chamber of Commerce, Member Directory Search for “Building Our Future Today,” <https://members.dccchamber.org/directory/results/results.aspx?keywords=building+our+future+today&adkeyword=building+our+future+today> (last visited Jan. 15, 2024).

6. On September 24, 2024, Badger Values was organized as an independent-expenditure only political action committee (*i.e.*, a “super PAC”) with Les Williamson serving as its treasurer.⁹
7. On October 15, 2024, Progressive Century Project organized as an independent-expenditure only political action committee; Gary Backus is its treasurer.¹⁰
8. As summarized in the table below, Badger Values and Progressive Century Project reported receiving a grand total of \$2,590,000 in contributions from BOFT between October 17, 2024 and October 30, 2024.¹¹ These were the only contributions the committees received,¹² and the only contributions BOFT made.¹³

Date	Recipient Committee	Contribution Amount
10/17/24	BADGER VALUES	\$750,000.00
10/23/24	BADGER VALUES	\$850,000.00
10/29/24	BADGER VALUES	\$250,000.00
10/25/24	PROGRESSIVE CENTURY PROJECT	\$350,000.00
10/28/24	PROGRESSIVE CENTURY PROJECT	\$300,000.00
10/30/24	PROGRESSIVE CENTURY PROJECT	\$90,000.00
Total		\$2,590,000

⁹ Badger Values, Statement of Org. at 1 (Sep. 24, 2024), <https://docquery.fec.gov/pdf/908/202409249684722908/202409249684722908.pdf> (“Badger Values Statement of Org.”).

¹⁰ Progressive Century Project, Statement of Org. at 1 (Oct. 15, 2024), <https://docquery.fec.gov/pdf/184/202410159686130184/202410159686130184.pdf> (“PCP PAC Statement of Org.”).

¹¹ See Progressive Century Project, 2024 Post-General Report at 6 (Dec. 5, 2024), <https://docquery.fec.gov/cgi-bin/fecimg/?202412059739351303>; Badger Values, 2024 Post-General Report at 6 (Dec. 5, 2024), <https://docquery.fec.gov/cgi-bin/fecimg/?202412059720509782>.

¹² See Badger Values, Receipts, FEC, https://www.fec.gov/data/receipts/?data_type=processed&committee_id=C00889931&two_year_transaction_period=2024&min_date=01%2F01%2F2023&max_date=12%2F31%2F2024 (last visited Jan. 22, 2025); Progressive Century Project, Receipts, FEC, https://www.fec.gov/data/receipts/?data_type=processed&committee_id=C00891275&two_year_transaction_period=2024&min_date=01%2F01%2F2023&max_date=12%2F31%2F2024 (last visited Jan. 22, 2025).

¹³ See All Receipts, Source: “Building Our Future Today,” FEC, https://www.fec.gov/data/receipts/?data_type=processed&contributor_name=building+our+future+today&two_year_transaction_period=2024&min_date=01%2F01%2F2023&max_date=12%2F31%2F2024 (last visited Jan. 22, 2025).

9. The address reported by both committees for BOFT, in connection with each of the contributions made in the LLC's name, was personal mailbox (shortened as "PMB" on the relevant disclosure reports) number 2204; a personal mailbox is a service offered by a virtual office service.¹⁴
10. Badger Values and PCP PAC reported making \$2,401,373.65 in independent expenditures between October 18, 2024 (*i.e.*, the day after BOFT's first purported contribution) and November 4, 2024 (*i.e.* the day before the 2024 election.)¹⁵
11. Badger Values terminated within a month of the election,¹⁶ while PCP PAC remains registered.¹⁷

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."¹⁸

¹⁴ See *id.*; PostScanMail, Washington DC Virtual Address, <https://www.postscanmail.com/a/1802-vernon-st-nw.html> (showing the address associated with BOFT's contributions is available for purchase as a "virtual address") (screenshots attached as Exhibit C).

¹⁵ See Badger Values, Independent Expenditures, FEC, https://www.fec.gov/data/independent-expenditures/?data_type=processed&q_spender=C00889931&is_notice=false&min_date=01%2F01%2F2023&max_date=12%2F31%2F2024 (last visited Jan. 22, 2025) (beginning on October 18 and ending on November 4, totaling \$1.81 million); Progressive Century Project, Independent Expenditures, FEC, https://www.fec.gov/data/independent-expenditures/?data_type=processed&q_spender=C00891275&is_notice=false&min_date=01%2F01%2F2023&max_date=12%2F31%2F2024 (last visited Jan. 22, 2025) (beginning on October 19 and ending on October 30, totaling \$589,000).

¹⁶ See Badger Values, Termination Report (Dec. 5, 2025), <https://docquery.fec.gov/pdf/589/202412059720510589/202412059720510589.pdf> ("Badger Values Termination Report").

¹⁷ See Progressive Century Project, FEC, <https://www.fec.gov/data/committee/C00891275/?tab=filings> (last visited Jan. 22, 2025) (listed as active).

¹⁸ 52 U.S.C. § 30122.

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.”¹⁹
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,²⁰ 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.”²¹
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

¹⁹ 11 C.F.R. § 110.4(b)(2)(i)–(ii).

²⁰ *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).

²¹ *Citizens United v. FEC*, 558 U.S. 310, 369–71 (2010).

person’s name or promised as reimbursement of a solicited contribution.²² 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].”²³

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 contribution in the name of another.²⁴ 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.”²⁵ 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.

²² 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.”).

²³ *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).

²⁴ 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>.

²⁵ *Id.*

These facts would suggest the corporate entity is a straw donor and not the true source of the contribution.²⁶

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 independent-expenditure only political committees (“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 reporting rules and conduit contribution rules in these circumstances.²⁷

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

²⁶ *Id.* at 12.

²⁷ 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.

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.”²⁸ The Commission subsequently entered into a conciliation agreement with Tomfoolery LLC and Chavez, which included a \$25,000 civil penalty.²⁹

19. Straw donor contributions like those alleged here are serious violations of federal campaign finance law that have led to criminal indictments and convictions.³⁰ As explained in one such indictment, the straw donor ban works in tandem with other 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.³¹ 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.³²
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

²⁸ 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”).

²⁹ See Conciliation Agreement ¶ VI, MUR 7903 (Tomfoolery LLC, *et al.*) (Oct. 3, 2022), https://www.fec.gov/files/legal/murs/7903/7903_16.pdf.

³⁰ 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>.

³¹ 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>.

³² 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>.

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:

BUILDING OUR FUTURE TODAY, LLC, BADGER VALUES, PCP PAC, AND THE UNKNOWN PERSON(S) WHO CONTRIBUTED TO BADGER VALUES AND PCP PAC IN THE NAME OF BUILDING OUR FUTURE TODAY, LLC VIOLATED 52 U.S.C. § 30122

21. The available information indicates that BOFT did not have the means to contribute \$2.59 million without one or more other persons providing funds to it for that purpose, such that these unknown other persons were, in fact, the true source(s) of the contributions made in BOFT's name to Badger Values and PCP PAC.
22. BOFT was registered as a Delaware corporation on August 8, 2024.³³ About two months after its formation, BOFT purportedly made \$2.59 million in contributions to super PACs over a period of less than two weeks, despite having engaged in no commercial or other activity from which BOFT could have generated sufficient funds to make political contributions in its own name.³⁴
23. During the two-month period between its formation and when it purported to contribute \$2.59 million to two super PACs, BOFT does not appear to have engaged in any activity from which it could have garnered the funds with which to make millions of dollars in contributions — absent being provided sufficient funds by one or more other persons, the true contributor(s). Indeed, BOFT appears to exist primarily on paper. It maintains no

³³ See Exh. A.

³⁴ See *supra* ¶¶ 5, 8.

physical or online presence, and there is no listing, article, or public record that provides any information about its activities beyond the contributions at issue.³⁵

24. As such, BOFT appears to have engaged in no activity between its formation and the contributions made in its name. It is utterly implausible that a nascent, two-month-old entity with no income-generating activity could have acquired sufficient funds to enable it to make a \$2.59 million contribution in its own name, with its own funds. Thus, BOFT appears to have “lacked the financial wherewithal to make the [\$2,590,000] contribution to [the committees] on its own.”³⁶
25. The use of a straw donor, such as the opaque and obscure Delaware LLC 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.
26. Accordingly, based on the foregoing, there is reason to believe that the unidentified person(s) who contributed \$2,590,000 to Badger Values and PCP PAC in the name of BOFT violated 52 U.S.C. § 30122 by making contributions in the name of another, and that BOFT violated 52 U.S.C. § 30122 by knowingly permitting its name to be used to effect the contributions of one or more other persons in its own name.
27. Furthermore, the available information supports finding reason to believe that Badger Values and PCP PAC violated 52 U.S.C. § 30122 by knowingly accepting \$2.59 million in contributions in the name of another.

³⁵ See *supra* ¶ 5.

³⁶ Tomfoolery F&LA at 5.

28. Badger Values and PCP PAC were both organized within weeks of BOFT's formation — September 24, 2024, and October 15, 2024, respectively — during the two-month period between when BOFT was formed on August 8, 2024, and when it began purportedly making contributions on October 17, 2024.³⁷ Moreover, Badger Values and PCP PAC received *all* of their funds — \$1,850,000 and \$740,000, respectively — from BOFT; neither committee received any money from any other source.³⁸ It is utterly implausible that these super PACs somehow did not know the identities of the true contributors providing 100% of their funding, which they immediately used to make millions of dollars in independent expenditures in the days before the 2024 election. Badger Values also terminated immediately after spending the funds provided by BOFT,³⁹ further indicating prearrangement of its funding and purpose.
29. In light of the short timeframe between the formation of the LLC and the two super PACs, as well as the fact that both super PACs received all of their funding from BOFT, the overall record supports finding reason to believe that both super PACs knew that BOFT was not the true source of the contributions made in its name, *i.e.*, that both Badger Values and PCP PAC violated 52 U.S.C. § 30122 by knowingly accepting contributions in the name of another.
- * * *
30. Finally, the facts of this matter support finding reason to believe the aforementioned violations of FECA were knowing and willful.

³⁷ See Exh. A; Badger Values Statement of Org., *supra* note 9; PCP PAC Statement of Org., *supra* note 10; *supra* ¶ 8.

³⁸ See *supra* ¶ 8.

³⁹ See Badger Values Termination Report, *supra* note 17.

31. 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.”⁴⁰ This standard does not require proving knowledge of the specific statute or regulation a person violated.⁴¹ Rather, it is sufficient to demonstrate that a respondent “acted voluntarily and was aware that his conduct was unlawful.”⁴² This awareness may be shown through circumstantial evidence, such as a person’s efforts to disguise their actions.⁴³
32. 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.”⁴⁴ 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.”⁴⁵
33. Here, the factual record strongly suggests that BOFT, Badger Values, PCP PAC, and those who anonymously funded BOFT acted intentionally to violate FECA’s disclosure laws and obscure their unlawful activities from public detection.
34. Less than three months passed between all the events at issue: An unknown person or persons created and funded BOFT, organized Badger Values and PCP PAC, and moved \$2.59 million from BOFT to the super PACs, which immediately began running

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

⁴¹ See *United States v. Danielczyk*, 917 F. Supp. 2d 573, 579 (E.D. Va. 2013).

⁴² *Id.*

⁴³ *United States v. Hopkins*, 916 F.2d 207, 213–15 (5th Cir. 1990).

⁴⁴ *Danielczyk*, 917 F. Supp. 2d at 579–80 (internal quotation marks omitted).

⁴⁵ *Id.*

independent expenditures.⁴⁶ The timing and highly coordinated nature of these events strongly indicates that those funding and operating BOFT, Badger Values, and PCP PAC planned their activities for the precise purpose of allowing unknown contributor(s) to influence federal elections without their identities becoming public.

35. The fact that BOFT was Badger Values' and PCP PAC's *only* contributor further solidifies that those behind the scheme were engaging in "wrongful conduct" and did not mistakenly violate the law.⁴⁷ It is utterly implausible that a political committee would rely on a single source of funding without knowing who was providing the money. Particularly when a committee begins spending virtually all of the money it receives from that source on independent expenditures *within days of receiving it*, there is reason to believe there was a prearranged plan between the committee, the true contributor, and the straw donor to evade public disclosure of the true contributor's identity.⁴⁸
36. Given these circumstances, there is reason to believe Badger Values and PCP PAC knew that the true source of the funds they received was not BOFT, yet neither super PAC disclosed the true source(s) of the funds, providing further evidence of knowing and willful intent.⁴⁹
37. Tellingly, those behind the straw donor scheme also sought to minimize their public footprint and evade identification by registering BOFT in a jurisdiction that does not require robust corporate disclosure and by using a PMB, ensuring that the entity was not connected to a residential or business address that could be traced to any individual.⁵⁰

⁴⁶ See *supra* ¶¶ 4-8, 10.

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

⁴⁸ See *supra* ¶¶ 8-10.

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

⁵⁰ See Exh. A; *supra* note 15.

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, BOFT appears to have taken additional steps to conceal the identities of all involved.

38. Because the totality of the facts indicates that BOFT, Badger Values, PCP PAC, and those who contributed to Badger Values and PCP PAC in the name of BOFT acted “with full knowledge of all the relevant facts and a recognition that [their actions were] prohibited by law,”⁵¹ the Commission should find reason to believe their violations of 52 U.S.C. § 30122 were knowing and willful.

⁵¹ *Danielczyk*, 917 F. Supp. 2d at 579.

PRAYER FOR RELIEF

39. Wherefore, the Commission should find reason to believe that BOFT, Badger Values, PCP PAC, and any person(s) who made contributions to Badger Values and PCP PAC in the name of BOFT, have violated 52 U.S.C. § 30101 *et seq.*, and conduct an immediate investigation under 52 U.S.C. § 30109(a)(2).
40. 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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1101 14th Street NW, Suite 400
Washington, DC 20005
Counsel to the Campaign Legal Center,
Roger G. Wieand

January 30, 2025

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




Roger G. Wieand

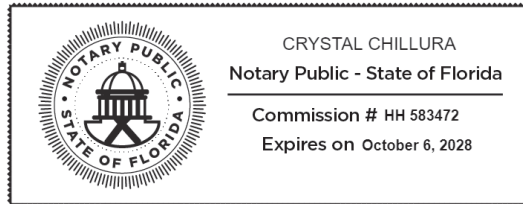
STATE OF FLORIDA COUNTY OF PASCO

Sworn to and subscribed before me this 30th day of January 2025.
by Roger G Wieand by means of Physical Presence, Online Notarization.

ID Provided Massachusetts Driver's License



Crystal Chillura
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 29 day of January 2025.



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: **4631179** Incorporation Date / Formation Date: **8/8/2024**
(mm/dd/yyyy)

Entity Name: **BUILDING OUR FUTURE TODAY, LLC**

Entity Kind: **Limited Liability Company** Entity Type: **General**

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

STATE OF DELAWARE
CERTIFICATE OF FORMATION
OF LIMITED LIABILITY COMPANY

The undersigned authorized person, desiring to form a nonprofit limited liability company pursuant to the Limited Liability Company Act of the State of Delaware, hereby certifies as follows:

1. The name of the limited liability company is Building Our Future Today, LLC.
2. The Registered Office of the limited liability company in the State of Delaware is located at 1209 Orange Street, Corporation Trust Center, Wilmington, Delaware, 19801, New Castle County. The name of the Registered Agent at such address upon whom process against this limited liability company may be served is The Corporation Trust Company.
3. The purpose of the limited liability company is to engage in any lawful act or activity for which non-profit limited liability companies may be organized under the Limited Liability Company Act of Delaware, including, without limitation, 6 Del. C. § 18-106(a)).
4. This limited liability company shall be a nonprofit limited liability company.


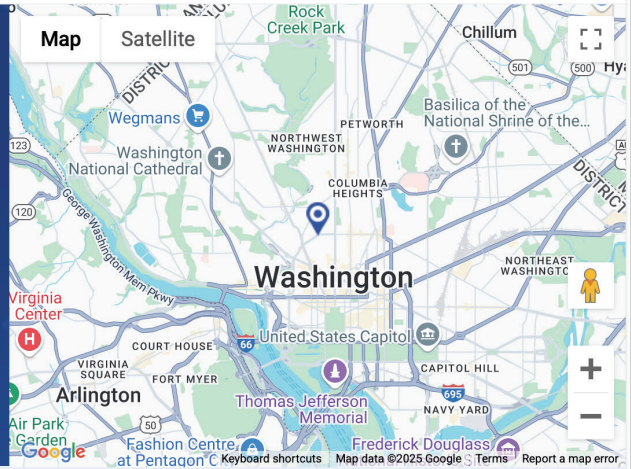
By: 
Its: Authorized Person
Name: Joan E. Colleran, Esq.

EXHIBIT C

Home / Locations / District of Columbia / Washington

Washington DC Virtual Address

Personal or LLC Business Use.



Your Name
Your Company Name
1802 Vernon St. NW
Washington, DC 20009

Monthly Annual (2 months free)

	MOST POPULAR	
Starter	Standard	Premium
\$20/m	\$30/m	\$40/m
Letters or Packages	Letters or Packages	Letters or Packages
30 per month	60 per month	120 per month
Open & Scan *	Open & Scan *	Open & Scan *
Not included	10 per month	20 per month
Recipients	Recipients	Recipients
2	3	6
SIGN UP	SIGN UP	SIGN UP

* Up to 10 pages, then \$.25 cents per additional page.