

## BEFORE THE FEDERAL ELECTION COMMISSION

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

v. MUR No. \_\_\_\_\_

CONSERVATIVES NETWORK  
14425 Falcon Head Blvd.  
Unit E100, Suite 225  
Austin, Texas 78738<sup>1</sup>

### COMPLAINT

1. Conservatives Network, a 501(c)(4) “dark money” nonprofit corporation, was formed in the midst of a hotly contested 2022 Senate primary election in Missouri and aired an electioneering ad supporting the candidacy of Missouri Attorney General Eric Schmitt on July 27, 2022—just one week before the primary. The ad, titled “Back the Blue,” cast Schmitt as an avid supporter of law enforcement and highlighted the fact that the Missouri Fraternal Order of Police had endorsed his candidacy, thus promoting a pro-law enforcement image that Schmitt had been trying to cultivate throughout his Senate campaign. Conservatives Network, which appointed a longtime Schmitt staffer as its treasurer, spent nearly all of its money—\$609,780 out of \$621,251 in 2022—on the “Back the Blue” ad, and then effectively shuttered after Schmitt won his party’s nomination.
2. These facts strongly support the conclusion that Conservatives Network satisfied the legal requirements of a “political committee,” and therefore violated the Federal Election

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<sup>1</sup> This is Conservatives Network’s principal office address, and the address it reported to the Federal Election Commission on an electioneering report. For notification purposes, Conservatives Network’s registered agent is Cogency Global Inc., 406 N. Main St., Suite B, Rolla, MO 65401-3154.

Campaign Act (“FECA”) by failing to register and report as a political committee—depriving Missouri voters and the public generally of crucial transparency information about the sources of funding used to influence the 2022 election. To this day, it is unclear where the money used to pay for the “Back the Blue” ad came from.

3. This complaint is filed pursuant to 52 U.S.C. § 30109(a)(1) and is based on information and belief that Conservatives Network 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.”<sup>2</sup>

## FACTUAL BACKGROUND

### *The 2022 Missouri GOP Primary Election*

4. When two-term Republican U.S. Senator Roy Blunt of Missouri announced that he would not run for reelection in the 2022 midterm elections, he triggered a highly competitive Republican primary, with 21 candidates vying for his open seat.<sup>3</sup> Three candidates emerged as frontrunners: Missouri Attorney General Eric Schmitt, former Missouri Governor Eric Greitens, and U.S. Representative Vicky Hartzler.<sup>4</sup>

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

<sup>3</sup> Jason Rosenbaum, *Schmitt Wins Missouri GOP Senate Primary, Topping Hartzler, Scandal-Plagued Greitens*, NPR (Aug. 2, 2022), <https://www.npr.org/sections/2022-live-primary-election-race-results/2022/08/02/1115272553/schmitt-greitens-hartzler-missouri-republican-senate-primary>.

<sup>4</sup> *Id.*; Jason Rosenbaum, *Trump Endorses ‘ERIC’ in Missouri Senate GOP Primary. Both Greitens and Schmitt Claim It’s Them*, NPR (Aug. 1, 2022), <https://www.kcur.org/politics-elections-and-government/2022-08-01/trump-endorses-eric-in-missouri-senate-gop-primary-both-greitens-and-schmitt-claim-its-them>; Tessa Weinberg, *et al.*, *Missouri AG Eric Schmitt Beats Hartzler, Greitens to Claim GOP Senate Nomination*, Mo. Indep. (Aug. 2, 2022), <https://missouriindependent.com/2022/08/02/missouri-ag-eric-schmitt-beats-hartzler-greitens-to-claim-gop-senate-nomination/>.

5. Schmitt’s opponents, including Greitens, repeatedly attacked Schmitt as a “RINO”<sup>5</sup> and highlighted Schmitt’s moderate record to bolster claims that he was not a true conservative.<sup>6</sup>
6. Schmitt countered these attacks on his conservative bona fides by pointing to his recent achievements as state attorney general, particularly making his support for law enforcement a central part of his campaign.<sup>7</sup> He claimed that he used his role as the state’s top prosecutor to support police officers and clean up the streets, and he promised to push back against efforts to “defund the police.”<sup>8</sup> On April 24, 2022, he received the endorsement of the Missouri Fraternal Order of Police, which news reporting stated was a “key” endorsement.<sup>9</sup>
7. Less than three weeks later, on May 13, 2022, Conservatives Network registered with the Missouri Secretary of State as a 501(c)(4) nonprofit corporation.<sup>10</sup> Conservatives Network reported a principal office address in Austin, Texas and listed Andrew Dziedzic as its treasurer.<sup>11</sup>

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<sup>5</sup> Rosenbaum, *Trump Endorses ‘ERIC,’* supra note 4.

<sup>6</sup> See Kacen Bayless, *Eric Schmitt’s Lawsuits Made Headlines. He’s Now the Republican Nominee for U.S. Senate*, KS City Star (Aug. 2, 2022), <https://www.kansascity.com/news/politics-government/article263822938.html>; Jason Rosenbaum, *Eric Schmitt Wins Contentious Missouri GOP Senate Primary*, NPR (Aug. 2, 2022), <https://www.stlpr.org/government-politics-issues/2022-08-02/eric-schmitt-wins-contentious-missouri-gop-senate-primary>.

<sup>7</sup> See @Eric\_Schmitt, X (Apr. 24, 2022), [https://x.com/Eric\\_Schmitt/status/1518392846885298182?s=20](https://x.com/Eric_Schmitt/status/1518392846885298182?s=20).

<sup>8</sup> *Id.*

<sup>9</sup> *Id.*; *Missouri Police Back Schmitt for Senate*, Mo. Times (Apr. 22, 2022), <https://themissouritimes.com/missouri-police-back-schmitt-for-senate/>.

<sup>10</sup> Nonprofit Corporation Details: Conservatives Network, Mo. Sec’y of State, <https://bsd.sos.mo.gov/BusinessEntity/BusinessEntityDetail.aspx?ID=4532332&page=beSearch> (last visited Dec. 3, 2025); Conservatives Network, Articles of Incorporation of a Nonprofit Corporation (May 13, 2022), available at <https://bsd.sos.mo.gov/Common/CorrespondenceItemViewHandler.ashx?IsTIFF=true&filedDocumentid=130407438&version=2>.

<sup>11</sup> 2023 Annual Registration Report, Conservatives Network (July 14, 2023), available at <https://bsd.sos.mo.gov/Common/CorrespondenceItemViewHandler.ashx?IsTIFF=true&filedDocumentid=133583240&version=2>.

8. Dziedzic worked for Schmitt in the state treasurer’s office, serving initially as a policy coordinator and then as chief of staff beginning in September 2017.<sup>12</sup> Dziedzic then worked for Schmitt in the Missouri Attorney General’s Office from 2018 to 2019, and again—following a break for law school—returned to Schmitt’s staff as legislative director of the U.S. Senate office in January 2023.<sup>13</sup>
9. On July 29, 2022, Conservatives Network filed a 24-hour report disclosing an electioneering communication—which FECA defines as a broadcast, cable, or satellite communication run within 30 days of a primary election, or 60 days of a general election, that refers to a clearly identified federal candidate and is targeted to the candidate’s electorate—in support of Schmitt titled “Back the Blue.”<sup>14</sup> Conservatives Network’s Federal Election Commission (“FEC” or “Commission”) disclosure stated that it spent \$609,780 on the television advertisement, which began airing on July 27, 2022<sup>15</sup>—exactly one week before the Missouri Republican primary.<sup>16</sup>
10. On July 27, 2022—the same day that Conservatives Network began running “Back the Blue”—Schmitt embarked on his “Fight Tyranny. Crush Socialism. Save America” campaign tour to deliver his final campaign message across the state.<sup>17</sup>

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<sup>12</sup> Press Release, Mo. Times (Sept. 17, 2017), <https://themissouritimes.com/treasurer-schmitt-announces-chief-staff-transition/>.

<sup>13</sup> Drew Dziedzic, LegiStorm, [https://www.legistorm.com/person/bio/453873/Andrew\\_C\\_Dziedzic.html](https://www.legistorm.com/person/bio/453873/Andrew_C_Dziedzic.html) (last visited Dec. 15, 2025); Joe Holleman, *Aide to Missouri’s Eric Schmitt Lands Job as White House Special Assistant*, St. Louis Post Dispatch (Feb. 18, 2025), [https://www.stltoday.com/news/local/column/joe-holleman/article\\_a74f7130-edec-11ef-815e-9f677d2cceb8.html](https://www.stltoday.com/news/local/column/joe-holleman/article_a74f7130-edec-11ef-815e-9f677d2cceb8.html).

<sup>14</sup> Conservatives Network, FEC Form 9 (24 Hour Notice of Disbursements/Obligations for Electioneering Communications) (July 29, 2022), <https://docquery.fec.gov/pdf/704/202207299525081704/202207299525081704.pdf>; see also 52 U.S.C. § 30104(f)(3)(A); 11 C.F.R. § 100.29.

<sup>15</sup> Conservatives Network, FEC Form 9, *supra* note 14.

<sup>16</sup> See Weinberg, *et al.*, *supra* note 4.

<sup>17</sup> WayBack Machine - *America First U.S. Senate Candidate Eric Schmitt Announces the Fight Tyranny. Crush Socialism. Save America. Campaign Tour*, Schmitt for Senate (July 26, 2022),



11. On August 2, 2022, Schmitt won the Republican primary.<sup>18</sup> He went on to win the November general election for U.S. Senate.<sup>19</sup>

***Conservatives Network’s Activity***

12. Conservatives Network’s 30-second “Back the Blue” television ad, which began running on July 27, 2022, contained the following audio and visuals:

Voiceover	Visual	On-Screen Text
Law enforcement is under attack.	Police officers carrying shields.	
Some want to defund our police.	Hooded protestors throwing smoke bombs. April 25, 2020, news footage of Representative Cori Bush with the headline “FLASHBACK: REP BUSH CALLS FOR ‘DEFUNDING’ POLICE.”	
No matter what happens, Attorney General Eric Schmitt always backs law enforcement.	B-roll of a town’s skyline. Schmitt talking with police officers and shaking an officer’s hand.	Schmitt “has shown by words, actions, he . . . stands with law enforcement” – Jay Schroeder, Missouri FOP vice president
And law enforcement backs the policies of the Attorney General’s Office under Eric Schmitt.	Schmitt shaking peoples’ hand while standing in front of a banner for the St. Louis Police Officers Association.	
Missouri police officers say they can count on Eric Schmitt.	Schmitt standing with police officers.	“Missouri Police Officers know we can count on Eric Schmitt” – Rick Inglima, president, Missouri FOP
Call Attorney General Eric Schmitt. Tell him to keep backing the blue and protecting you.	Schmitt standing in a courtroom. Schmitt walking with police officers.	CALL (573) 751-3321 TELL ATTORNEY GENERAL ERIC SCHMITT TO KEEP BACKING THE BLUE

<https://web.archive.org/web/20220922085541/https://schmittforsenate.com/2022/07/26/america-first-u-s-senate-candidate-eric-schmitt-announces-the-fight-tyranny-crush-socialism-save-america-campaign-tour/>.

<sup>18</sup> Weinberg, *et al.*, *supra* note 4.

<sup>19</sup> Jim Salter, *Schmitt Defeats Busch Beer Heir in Missouri U.S. Senate Race*, AP (Nov. 9, 2022), <https://apnews.com/article/missouri-senate-race-2022-midterm-elections-91f950681a72abe1ea6bc20f45bf42ec>.

Conservatives Network is responsible for the content of this advertising.	Schmitt posing with police officers.	CALL (573) 751-3321 TELL ATTORNEY GENERAL ERIC SCHMITT TO KEEP BACKING THE BLUE <sup>20</sup>
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13. The video footage used in the ad, showing Schmitt in front of a St. Louis Police Officers Association banner, came from the press conference in which the Missouri Fraternal Order of Police endorsed him.<sup>21</sup> The ad also included quotes from both the president and vice president of the Missouri Fraternal Order of Police (“FOP”) regarding the endorsement.<sup>22</sup>
14. Outside of running this electioneering communication, Conservatives Network engaged in virtually no other activity. According to its 2022 IRS Form 990, the organization spent \$600,000 on “issue advocacy” and \$9,780 on “advertising and promotion.”<sup>23</sup> It described its advocacy as “a media campaign to support law enforcement in Missouri.”<sup>24</sup> These two amounts combined equal \$609,780, which is the exact amount Conservatives Network reported to the FEC as an electioneering communication.<sup>25</sup>
15. The only other expenses Conservatives Network reported on its 2022 Form 990 were \$7,337 for legal expenses, \$3,638 for other services, \$310 in bank fees, and \$186 in subscriptions.<sup>26</sup> Accordingly, it spent \$609,708 out of \$621,251 on an electioneering communication, amounting to 98% of its total reported expenditures for 2022.

<sup>20</sup> A “paid for by” disclaimer also appears on the last frame. *See Advertisement for Eric Schmitt for Senate 2022*, YouTube, <https://www.youtube.com/watch?v=Luq8vuVc1dg> (posted Jan. 7, 2026).

<sup>21</sup> *See @Eric\_Schmitt*, *supra* note 7.

<sup>22</sup> *See Advertisement for Eric Schmitt for Senate 2022*, *supra* note 20; *see also Missouri Police Back Schmitt for Senate*, *supra* note 9.

<sup>23</sup> Exh. 1 (Conservatives Network, 2022 Form 990) at 10.

<sup>24</sup> *Id.* at 1.

<sup>25</sup> *See* Conservatives Network, FEC Form 9, *supra* note 14.

<sup>26</sup> Exh. 1 at 10.

16. In 2023, according to its Form 990, Conservatives Network spent \$26,641 on subscriptions and “other services” under the heading “management and general expenses.”<sup>27</sup>
17. In 2024—the last year for which there is a Form 990 available—Conservatives Network spent just \$1,229 between “professional fees and other payments to independent contractors” and subscriptions.<sup>28</sup> It ended the year with \$879 on hand.<sup>29</sup> In May 2025, it filed “articles of dissolution” with the Missouri Secretary of State’s Office.<sup>30</sup>
18. Accordingly, over Conservatives Network’s lifetime, it spent \$609,708 out of \$649,121 on electioneering, which represents 94% of its total lifetime spending.

#### SUMMARY OF THE LAW

19. FECA defines the term “political committee” to mean “any committee, club, association, or other group of persons which receives contributions aggregating in excess of \$1,000 during a calendar year or which makes expenditures aggregating in excess of \$1,000 during a calendar year.”<sup>31</sup>
20. In *Buckley v. Valeo*, the Supreme Court construed the term “political committee” to “only encompass organizations that are under the control of a candidate or the major purpose of which is the nomination or election of a candidate.”<sup>32</sup> Later, in *FEC v. Massachusetts Citizens for Life*, the Court again invoked the “major purpose” test and noted, in the

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<sup>27</sup> Exh. 2 (Conservatives Network, 2023 Form 990) at 10.

<sup>28</sup> Exh. 3 (Conservatives Network, 2024 Form 990) at 1 & “Additional Data.”

<sup>29</sup> *Id.* at 2.

<sup>30</sup> Conservatives Network, Articles of Dissolution by Voluntary Action for a Nonprofit Corporation (May 7, 2025), available at <https://bsd.sos.mo.gov/Common/CorrespondenceItemViewHandler.ashx?IsTIFF=true&filedDocumentid=138737633&version=4>.

<sup>31</sup> 52 U.S.C. § 30101(4)(A); *see also* 11 C.F.R. § 100.5(a).

<sup>32</sup> 424 U.S. 1, 79 (1976).

context of analyzing the activities of a 501(c)(4) group, that if a group's electoral activities "become so extensive that the organization's major purpose may be regarded as campaign activity, the corporation would be classified as a political committee."<sup>33</sup> In that instance, the Court continued, the group would become "subject to the obligations and restrictions applicable to those groups whose primary objective is to influence political campaigns."<sup>34</sup> In *McConnell v. FEC*, the Supreme Court reiterated the "major purpose" test for political committee status as stated in *Buckley*.<sup>35</sup>

21. Consequently, the FEC applies a two-prong test for "political committee" status, evaluating: (1) whether the entity has received "contributions" or made "expenditures" of more than \$1,000 in a calendar year, and (2) whether its "major purpose" is influencing the "nomination or election of a candidate."<sup>36</sup> These prongs are known respectively as the "statutory test" and the "major purpose test."
22. Any entity that meets the definition of "political committee" must file a statement of organization with the Commission, comply with certain organizational and recordkeeping requirements, and file periodic disclosure reports of receipts and disbursements.<sup>37</sup>
23. The disclosure reports required by FECA must disclose to the Commission and the public, including complainants, specific information regarding such committee's financial activities, including the identity of any donor who has contributed more than

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<sup>33</sup> 479 U.S. 238, 262 (1986).

<sup>34</sup> *Id.*

<sup>35</sup> 540 U.S. 93, 170 n.64 (2003).

<sup>36</sup> See Supplemental Explanation and Justification on Political Committee Status, 72 Fed. Reg. 5595, 5597 (Feb. 7, 2007), <https://www.govinfo.gov/content/pkg/FR-2007-02-07/pdf/E7-1936.pdf> [hereinafter, "PC Status E&J"].

<sup>37</sup> 52 U.S.C. §§ 30102, 30103(a), 30104(a); see also 11 C.F.R. §§ 102.1(d), 102.9, 104.1(a).

\$200 to the committee within the calendar year.<sup>38</sup> Courts have repeatedly recognized the importance of campaign finance disclosure to informing the electorate.<sup>39</sup>

### *Statutory Test*

24. As stated above, an organization may meet the statutory threshold for political-committee status by either accepting or making sufficient “contributions” or “expenditures.”<sup>40</sup> Under FECA, the term “expenditure” includes any “gift of money or anything of value [ ] made by any person for the purpose of influencing any election for Federal office.”<sup>41</sup> As such, any group that spends more than \$1,000 in a calendar year “for the purpose of influencing” a federal election has satisfied the statutory test.
25. Nearly 20 years ago, the FEC adopted an overly narrow interpretation of the political-committee status test based on its erroneous reliance on language from a portion of the *Buckley* decision unrelated to the political-committee status test.<sup>42</sup> In particular, the FEC limited its reading of the term “expenditure” in the context of determining political committee status to spending on “express advocacy”—*i.e.*, communications that “urge the election or defeat of one or more clearly identified candidate(s)” through so-called “magic words” and/or their functional equivalent.<sup>43</sup> A federal court rejected the agency’s interpretation of *Buckley*, however, stating that “the [*Buckley*] Court imposed the

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<sup>38</sup> 52 U.S.C. § 30104(b); *see also* 11 C.F.R. § 104.3.

<sup>39</sup> *See, e.g., Citizens United v. FEC*, 558 U.S. 310, 369 (2010) (“[T]he public has an interest in knowing who is speaking about a candidate shortly before an election.”); *Stop This Insanity Inc. Emp. Leadership Fund v. FEC*, 761 F.3d 10, 17 (D.C. Cir. 2014); *CREW v. FEC*, 209 F. Supp. 3d 77, 81 (D.D.C. 2016) (“[D]isclosure ‘open[s] the basic process of our federal election[s] to public view,’ . . . by ‘provid[ing] the electorate with information’ concerning the sources and outlets for campaign money” (internal citations omitted)).

<sup>40</sup> *See* 52 U.S.C. § 30101(4)(A); *see also* 11 C.F.R. § 100.5(a).

<sup>41</sup> 52 U.S.C. § 30101(9)(A)(i); *see also* 11 C.F.R. § 100.111(a).

<sup>42</sup> *See* PC Status E&J at 5597.

<sup>43</sup> *See* 11 C.F.R. § 100.22.

narrowing gloss of express advocacy on the term ‘expenditure’ *only with regard to groups other than ‘major purpose groups.’*”<sup>44</sup>

26. The Supreme Court in *McConnell* reaffirmed the principle that *all* expenditures by major-purpose groups—not just those for express advocacy—“are, by definition, campaign related,”<sup>45</sup> and several federal district court decisions have since followed suit.<sup>46</sup>
27. Accordingly, spending by a major-purpose group “for the purpose of influencing any election for Federal office” that exceeds \$1,000 during a calendar year satisfies the statutory test for political committee status.<sup>47</sup>

#### *Major Purpose Test*

28. The second prong of the political-committee status test is the major-purpose inquiry, which the Commission has explained is a “fact-intensive analysis of a group’s campaign activities compared to its activities unrelated to campaigns.”<sup>48</sup> In parsing an organization’s major purpose, the Commission examines the organization’s relative spending on campaign versus non-campaign activities, in addition to factors such as statements made to prospective donors, public statements, internal communications,

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<sup>44</sup> *Shays v. FEC*, 511 F. Supp. 2d 19, 27 (D.D.C. 2007) (emphasis added).

<sup>45</sup> See *McConnell*, 540 U.S. at 170 n.64 (quoting *Buckley*, 424 U.S. at 79) (“[A] general requirement that political committees disclose their expenditures raised no vagueness problems because the term ‘political committee’ ‘need only encompass organizations that are under the control of a candidate or the major purpose of which is the nomination or election of a candidate’ and thus a political committee’s expenditures ‘are, by definition, campaign related.’”).

<sup>46</sup> See *CREW v. FEC*, 164 F. Supp. 3d 113, 116 (D.D.C. 2015) (“FECA provides that any . . . group of persons . . . that makes more than \$1,000 in ‘expenditures’ for ‘the purpose of influencing any election for Federal office’ during a calendar year constitutes a ‘political committee.’ 52 U.S.C. § 30101(4)(A), (8)(A), (9)(A).”); *EMILY’s List v. FEC*, 569 F. Supp. 2d 18, 43 (D.D.C. 2008) (“[F]or expenditures made by those other than candidates and political committees, the [*Buckley*] Court applied a narrowing gloss to avoid constitutional concerns, by interpreting the term “expenditure” to reach “only funds used for [express advocacy].”), *rev’d on other grounds*, 581 F.3d 1 (D.C. Cir. 2009).

<sup>47</sup> See 52 U.S.C. § 30101(9)(A)(i); see also 11 C.F.R. § 100.111(a).

<sup>48</sup> PC Status E&J at 5601.

government filings (such as statements on a Form 990 or articles of incorporation), and the lifespan of the organization relative to the election cycle.<sup>49</sup>

29. Importantly, “electioneering communications *presumptively* have an election-related purpose,”<sup>50</sup> and, as such, presumptively count toward an organization’s campaign-related spending.<sup>51</sup> Indeed, a federal court concluded in 2018 that “to the extent the Commission considers an entity’s spending in assessing its major purpose, it must presumptively treat spending on electioneering ads as indicating a purpose of nominating or electing a candidate.”<sup>52</sup> According to the court, while the Commission might “deem an extraordinary ‘electioneering communication’ as lacking an election-related purpose . . . such an ad [would] be a rare exception.”<sup>53</sup>
30. Relatedly, the court stressed that a call to action imploring viewers to contact a representative to express their opinion on an issue would *not* overcome the presumption

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<sup>49</sup> See *id.* at 5605. While not determinative of this complaint, a federal court has instructed that the Commission cannot determine major purpose by comparing an organization’s *lifetime* spending on election-related versus non-election-related activities, because that approach leaves no room to recognize that an organization’s major purpose can change over time. See *CREW*, 209 F. Supp. 3d at 94.

<sup>50</sup> *CREW v. FEC*, 299 F. Supp. 3d 83, 93 (D.D.C. 2018).

<sup>51</sup> See, e.g., Conciliation Agreement ¶ IV.11, MUR 5754 (MoveOn.org Voter Fund) (relying on funds used for advertisements that “opposed” or “criticized” George W. Bush to establish political committee status); Factual & Legal Analysis at 2, MUR 5753 (League of Conservation Voters 527) (finding major purpose satisfied where funds spent on door-to-door and phone bank express advocacy campaign, and also on advertisements “supporting or opposing clearly identified federal candidates, some of which contained express advocacy”); Conciliation Agreement ¶ IV.14, MUR 5487 (Progress for America Voter Fund) (concluding that PFA VF had met the major purpose test after spending 60% of its funds on communications that “praised George W. Bush’s leadership as President and/or criticized Senator Kerry’s ability to provide similar leadership”); see also Stipulation for Entry of Consent Judgment ¶ 22, *FEC v. Citizens Club for Growth, Inc.*, Civ. No. 1:05-01851 (Sept. 6, 2007) (entering stipulation of Commission and respondent, approved as part of a consent judgment, where organization was treated as a political committee because “the vast majority of [the group’s disbursements] were made in connection with federal elections, including, but not limited to, funding for candidate research, polling, and advertisements and other public communications referencing a clearly identified federal candidate”).

<sup>52</sup> *CREW v. FEC*, 299 F. Supp. 3d at 93.

<sup>53</sup> *Id.* at 97 (noting that “Congress has made a judgment that run-of-the-mill electioneering communications have the purpose of influencing an election; an ad meeting the statutory definition of an electioneering communication generally indicates a purpose of nominating or electing a candidate”).

that an electioneering ad has an election-related purpose.<sup>54</sup> The court recognized that such a rule would allow organizations to hide behind “a *reverse* ‘magic words’ test” and would not genuinely distinguish election advocacy from issue advocacy.<sup>55</sup>

## CAUSE OF ACTION

### COUNT I:

#### **CONSERVATIVES NETWORK FAILED TO REGISTER AS A POLITICAL COMMITTEE AND FILE DISCLOSURE REPORTS, IN VIOLATION OF 52 U.S.C. §§ 30102, 30103, AND 30104**

31. The available information indicates that Conservatives Network satisfied the requirements for political committee status in 2022 when it made more than \$1,000 in expenditures and its major purpose was electing Eric Schmitt to the U.S. Senate. Accordingly, as set forth below, there is reason to believe that Conservatives Network violated 52 U.S.C. §§ 30102, 30103, and 30104, by failing to organize, register, and report as a political committee.
32. The overall record clearly supports finding reason to believe the “Back the Blue” electioneering communication was an “expenditure” for purposes of the statutory test and “election related” for purposes of the major purpose test.
33. “Back the Blue,” as an electioneering communication, presumptively had the purpose of influencing a federal election,<sup>56</sup> and there is no basis to conclude that the ad is the “rare exception” that overcomes that presumption.<sup>57</sup>

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<sup>54</sup> *Id.* at 99.

<sup>55</sup> *Id.*

<sup>56</sup> *See id.* at 93.

<sup>57</sup> *See id.* at 97.



34. The content of the ad—Schmitt’s explicit support of police officers, and police officers’ explicit support of Schmitt—sought to bolster Schmitt’s electoral odds, not to influence any live policy issue.<sup>58</sup>
35. The ad’s focus on the imminent election is evident from the audio and visuals. The discussion of Schmitt’s pro-police policies (which is vague to begin with) is couched in rhetoric about how police officers feel about Schmitt. The ad states, “[L]aw enforcement backs the policies of the Attorney General’s Office under Eric Schmitt. Missouri police officers say they can count on Eric Schmitt.”<sup>59</sup> The ad thus reads as an endorsement of Schmitt’s candidacy by Missouri’s police force—and indeed, it includes footage from the Missouri Fraternal Order of Police endorsing Schmitt for Senate, quotes two of the organization’s officers about the endorsement, and showcases footage of Schmitt walking with and shaking hands with police officers.<sup>60</sup> The ad thus serves to highlight what was described as a “key” endorsement in the Senate race,<sup>61</sup> not persuade Schmitt to continue any particular policy.
36. The ad’s one-time use of the word “policies” and its closing exhortation—“Call Attorney General Eric Schmitt. Tell him to keep backing the blue and protecting you”—are fig leaves.<sup>62</sup> While the ad opens by stating that “law enforcement is under attack” and that “some want to defund our police,” the ad makes no mention of any specific, live policy that Schmitt, as a state attorney general, could continue or influence.<sup>63</sup> Instead, it relies on

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<sup>58</sup> See *Advertisement for Eric Schmitt for Senate 2022*, *supra* note 20.

<sup>59</sup> *Id.*

<sup>60</sup> *Id.*; see also *supra* ¶ 13.

<sup>61</sup> See *supra* ¶ 6.

<sup>62</sup> See *Advertisement for Eric Schmitt for Senate 2022*, *supra* note 20.

<sup>63</sup> See *id.* To the extent “defunding” the police was a live issue in 2022, it was not one Schmitt, as Attorney General, could control. The Missouri Attorney General does not have power over the state’s or any locality’s police budget.

generic platitudes designed to play up Schmitt’s pro-law enforcement bona fides, *e.g.*, “Attorney General Eric Schmitt always backs law enforcement.”<sup>64</sup> As a court has recognized, sprinkling policy-sounding words or calls to action over an ad that is otherwise obviously meant to influence an election does not transform the ad into pure issue speech.<sup>65</sup>

37. In sum, Conservatives Network ran an ad that bolstered one of Schmitt’s primary campaign themes—his staunch support for law enforcement—and helped reinforce the narrative that Schmitt is a true conservative worthy of the Republican base’s support.<sup>66</sup> From every angle, Conservatives Network’s ad is a “run-of-the-mill electioneering communications [with] the purpose of influencing an election.”<sup>67</sup>
38. Additional facts about Conservatives Network’s formation, spending pattern, and leadership also bear on the major-purpose test and further indicate that Conservatives Network’s major—if not sole—purpose was electing Schmitt.
39. Conservatives Network was organized in May 2022, in the middle of Schmitt’s heavily contested primary election.<sup>68</sup> It spent almost all of its money in the week before the primary, and then it virtually ceased operations, spending very little in 2023 and almost nothing in 2024, before seeking to terminate in 2025.<sup>69</sup> Its activity is thus akin to a “pop up” super PAC designed to spend large sums of money on electoral ads right before an

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See Office of the Att’y Gen., Mo.gov, <https://www.mo.gov/government/guide-to-missouris-government/office-of-the-attorney-general/> (last visited Dec. 17, 2025).

<sup>64</sup> *Advertisement for Eric Schmitt for Senate 2022*, *supra* note 20.

<sup>65</sup> See *CREW*, 209 F. Supp. 3d at 99.

<sup>66</sup> See *supra* ¶ 6.

<sup>67</sup> See *CREW*, 209 F. Supp. 3d at 97.

<sup>68</sup> Nonprofit Corporation Details: Conservatives Network, MO Sec’y of State, *supra* note 10.

<sup>69</sup> See *supra* ¶¶ 14-17.

election without disclosing the sources of that spending until after the election,<sup>70</sup> which plainly suggests that Conservatives Network’s sole purpose was supporting Schmitt’s candidacy for the U.S. Senate at a pivotal moment in the 2022 election cycle.<sup>71</sup>

40. Conservatives Network’s treasurer, Andrew Dziedzic, was also one of Schmitt’s long-tenured political staffers. Dziedzic worked for Schmitt at least as far back as 2016, when Schmitt was elected state treasurer, and then continued working for him in the state Attorney General’s office; he then joined Schmitt’s incoming Senate staff in 2023 as legislative director.<sup>72</sup> The fact that Conservatives Network installed a longtime Schmitt staffer in a leadership position further indicates that the organization’s major purpose was electing Schmitt, not supporting law enforcement, and that its spending on an electioneering communication served that purpose rather than advancing any policy issue.
41. Finally, Conservatives Network ran “Back the Blue” just seven days before Schmitt’s highly competitive primary election, on the same day that Schmitt started his final campaign tour through the state to make his closing arguments about why he should be Missouri’s next U.S. Senator.<sup>73</sup> As such, the ad’s timing closely aligned with the 2022 primary election; it was certainly not an ad run at the margins of the electioneering period. This temporal connection between the ad, the election, and Schmitt’s well-publicized campaign plans underscores Conservatives Network’s electoral purpose.

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<sup>70</sup> See Carolyn Daly, “Pop-up” Super PACs Game the System to Leave Voters in the Dark, Campaign Legal Center (June 4, 2024), <https://campaignlegal.org/update/pop-super-pacs-game-system-leave-voters-dark>; Saurav Ghosh, *Secret Spending Keeps Popping Up in Our Elections*, Campaign Legal Center (Oct. 26, 2022), <https://campaignlegal.org/update/secret-spending-keeps-popping-our-elections>.

<sup>71</sup> See PC Status E&J at 5601.

<sup>72</sup> See *supra* ¶ 8.

<sup>73</sup> See *supra* ¶¶ 9-10.

42. Conservatives Network’s \$609,780 in spending on the advertisement and the surrounding facts thus satisfy both the statutory and major-purpose prongs of the political-committee status test: The ad’s purpose was electing Schmitt, the ad resulted in an expenditure vastly in excess of the \$1,000 statutory threshold, the group’s spending on the ad (98% or 94% of its overall spending, depending on the denominator) comprised virtually all of its activity, and the organization’s lifespan and leadership indicate that Conservatives Network existed to support Schmitt’s Senate campaign.<sup>74</sup>
43. Because Conservatives Network never registered or organized as a political committee, and failed to file any periodic disclosure reports with the FEC, despite meeting the legal definition of a “political committee,” there is reason to believe it violated 52 U.S.C. §§ 30102, 30103, and 30104. It thereby denied the public, including complainants, of statutorily required information about the sources and recipients of its election spending.

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<sup>74</sup> See *supra* ¶¶ 7-8, 12-18.

**PRAYER FOR RELIEF**

44. Wherefore, the Commission should find reason to believe that Conservatives Network has violated 52 U.S.C. § 30101 *et seq.*, and conduct an immediate investigation under 52 U.S.C. § 30109(a)(2).
45. 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,

/s/ Saurav Ghosh  
Campaign Legal Center, by  
Saurav Ghosh, Esq.  
1101 14th Street NW, Suite 400  
Washington, DC 20005  
(202) 736-2200

Saurav Ghosh, Esq.  
Campaign Legal Center  
1101 14th Street NW, Suite 400  
Washington, DC 20005  
Counsel to the Campaign Legal Center,  
Roger G. Wieand

/s/ Roger G. Wieand  
Roger G. Wieand  
1101 14th Street NW, Suite 400  
Washington, DC 20005  
(202) 736-2200

January 7, 2026

**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

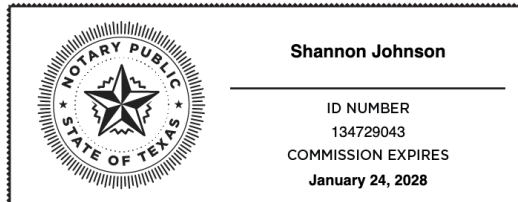
State of Texas

County of Tarrant

Sworn to and subscribed before me this 7th day of January 2026.



Notary Public State of Texas  
Shannon Johnson



Electronically signed and notarized online using the Proof platform.

## 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

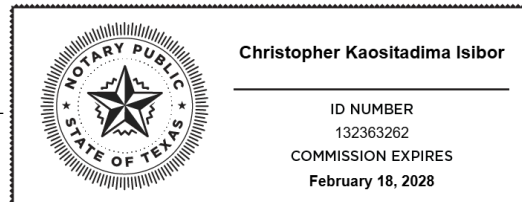
Saurav Ghosh

Saurav Ghosh, Esq.

Texas State, Williamson County

Sworn to and subscribed before me this 7<sup>th</sup> day of January 2026.

Christopher  
Notary Public



Electronically signed and notarized online using the Proof platform.

# Exhibit 1



efile Public Visual Render		ObjectId: 202323199349329862 - Submission: 2023-11-15	TIN: 88-2273990
Form 990	Return of Organization Exempt From Income Tax		OMB No. 1545-0047
	Under section 501(c), 527, or 4947(a)(1) of the Internal Revenue Code (except private foundations) Do not enter social security numbers on this form as it may be made public. Go to <a href="http://www.irs.gov/Form990">www.irs.gov/Form990</a> for instructions and the latest information.		2022 Open to Public Inspection
Department of the Treasury Internal Revenue Service			

A For the 2022 calendar year, or tax year beginning 05-13-2022, and ending 12-31-2022			
B Check if applicable: <input type="checkbox"/> Address change <input type="checkbox"/> Name change <input checked="" type="checkbox"/> Initial return <input type="checkbox"/> Final return/terminated <input type="checkbox"/> Amended return <input type="checkbox"/> Application pending	C Name of organization CONSERVATIVES NETWORK		D Employer identification number 88-2273990
	Doing business as		E Telephone number (512) 354-1787
	Number and street (or P.O. box if mail is not delivered to street address)	Room/suite	G Gross receipts \$ 650,000
	14425 FALCON HEAD BLVD UNIT E100		
	City or town, state or province, country, and ZIP or foreign postal code AUSTIN, TX 78738		
F Name and address of principal officer: CHRISTOPHER CRANCER 14425 FALCON HEAD BLVD UNIT E100 AUSTIN, TX 78738		H(a) Is this a group return for subordinates? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No H(b) Are all subordinates included? <input type="checkbox"/> Yes <input type="checkbox"/> No If "No," attach a list. See instructions. H(c) Group exemption number	
I Tax-exempt status: <input type="checkbox"/> 501(c)(3) <input checked="" type="checkbox"/> 501(c) ( 4 ) (insert no.) <input type="checkbox"/> 4947(a)(1) or <input type="checkbox"/> 527			
J Website: N/A			
K Form of organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Trust <input type="checkbox"/> Association <input type="checkbox"/> Other		L Year of formation: 2022	M State of legal domicile: MO

Part I Summary			
Activities & Governance	1 Briefly describe the organization's mission or most significant activities: THE ORGANIZATION SPONSORED A MEDIA CAMPAIGN TO SUPPORT LAW ENFORCEMENT IN MISSOURI.		
	2 Check this box <input type="checkbox"/>		
	3 Number of voting members of the governing body (Part VI, line 1a)	3	3
	4 Number of independent voting members of the governing body (Part VI, line 1b)	4	3
	5 Total number of individuals employed in calendar year 2022 (Part V, line 2a)	5	0
	6 Total number of volunteers (estimate if necessary)	6	3
	7a Total unrelated business revenue from Part VIII, column (C), line 12	7a	0
b Net unrelated business taxable income from Form 990-T, Part I, line 11	7b	0	
Revenue	8 Contributions and grants (Part VIII, line 1h)	Prior Year	Current Year
	9 Program service revenue (Part VIII, line 2g)		650,000
	10 Investment income (Part VIII, column (A), lines 3, 4, and 7d)		0
	11 Other revenue (Part VIII, column (A), lines 5, 6d, 8c, 9c, 10c, and 11e)		0
	12 Total revenue—add lines 8 through 11 (must equal Part VIII, column (A), line 12)		650,000
Expenses	13 Grants and similar amounts paid (Part IX, column (A), lines 1-3)		0
	14 Benefits paid to or for members (Part IX, column (A), line 4)		0
	15 Salaries, other compensation, employee benefits (Part IX, column (A), lines 5-10)		0
	16a Professional fundraising fees (Part IX, column (A), line 11e)		0
	b Total fundraising expenses (Part IX, column (D), line 25)		0
	17 Other expenses (Part IX, column (A), lines 11a-11d, 11f-24e)		621,251
	18 Total expenses. Add lines 13-17 (must equal Part IX, column (A), line 25)		621,251
19 Revenue less expenses. Subtract line 18 from line 12		28,749	
Net Assets or Fund Balances	Beginning of Current Year		End of Year
	20 Total assets (Part X, line 16)		28,749
	21 Total liabilities (Part X, line 26)		0
22 Net assets or fund balances. Subtract line 21 from line 20		28,749	

Part II Signature Block	
Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.	

Sign Here

Signature of officer  
MATTHEW BELZ SECRETARY  
Type or print name and title

2023-11-15  
Date

Paid Preparer Use Only

Print/Type preparer's name

Preparer's signature

Date  
2023-11-15

Check ☐ if self-employed

PTIN  
P01257722

Firm's name ▶ ATCHLEY & ASSOCIATES LLP

Firm's EIN ▶ 74-2920819

Firm's address ▶ 1005 LA POSADA DRIVE  
AUSTIN, TX 78752

Phone no. (512) 346-2086

May the IRS discuss this return with the preparer shown above? See Instructions. ☒ Yes ☐ No

**For Paperwork Reduction Act Notice, see the separate instructions.** Cat. No. 11282Y Form **990** (2022)

Part III

Statement of Program Service Accomplishments

Check if Schedule O contains a response or note to any line in this Part III ☐

1

Briefly describe the organization's mission:  
THE ORGANIZATION'S MISSION IS TO ADVANCE CONSERVATIVE POLICIES IN THE STATE OF MISSOURI.

2

Did the organization undertake any significant program services during the year which were not listed on the prior Form 990 or 990-EZ? ☐ Yes ☒ No  
If "Yes," describe these new services on Schedule O.

3

Did the organization cease conducting, or make significant changes in how it conducts, any program services? ☐ Yes ☒ No  
If "Yes," describe these changes on Schedule O.

4

Describe the organization's program service accomplishments for each of its three largest program services, as measured by expenses. Section 501(c)(3) and 501(c)(4) organizations are required to report the amount of grants and allocations to others, the total expenses, and revenue, if any, for each program service reported.

4a

(Code: ) (Expenses \$ 609,780 including grants of \$ ) (Revenue \$ )  
THE ORGANIZATION SPONSORED TELEVISION ADVERTISING TO SUPPORT PRO LAW ENFORCEMENT POLICIES IN MISSOURI.

4b

(Code: ) (Expenses \$ including grants of \$ ) (Revenue \$ )

4c

(Code: ) (Expenses \$ including grants of \$ ) (Revenue \$ )


4d

Other program services (Describe in Schedule O.)  
(Expenses \$ including grants of \$ ) (Revenue \$ )

4e

Total program service expenses ▶ 609,780

**Part IV Checklist of Required Schedules**

	Yes	No
<b>1</b> Is the organization described in section 501(c)(3) or 4947(a)(1) (other than a private foundation)? If "Yes," complete Schedule A . . . . .	<b>1</b>	No
<b>2</b> Is the organization required to complete Schedule B, Schedule of Contributors? See instructions.  . . . . .	<b>2</b> Yes	
<b>3</b> Did the organization engage in direct or indirect political campaign activities on behalf of or in opposition to candidates for public office? If "Yes," complete Schedule C, Part I . . . . .	<b>3</b>	No
<b>4 Section 501(c)(3) organizations.</b> Did the organization engage in lobbying activities, or have a section 501(h) election in effect during the tax year? If "Yes," complete Schedule C, Part II . . . . .	<b>4</b>	
<b>5</b> Is the organization a section 501(c)(4), 501(c)(5), or 501(c)(6) organization that receives membership dues, assessments, or similar amounts as defined in Rev. Proc. 98-19? If "Yes," complete Schedule C, Part III . . . . .	<b>5</b>	No
<b>6</b> Did the organization maintain any donor advised funds or any similar funds or accounts for which donors have the right to provide advice on the distribution or investment of amounts in such funds or accounts? If "Yes," complete Schedule D, Part I . . . . .	<b>6</b>	No
<b>7</b> Did the organization receive or hold a conservation easement, including easements to preserve open space, the environment, historic land areas, or historic structures? If "Yes," complete Schedule D, Part II . . . . .	<b>7</b>	No
<b>8</b> Did the organization maintain collections of works of art, historical treasures, or other similar assets? If "Yes," complete Schedule D, Part III . . . . .	<b>8</b>	No
<b>9</b> Did the organization report an amount in Part X, line 21 for escrow or custodial account liability; serve as a custodian for amounts not listed in Part X; or provide credit counseling, debt management, credit repair, or debt negotiation services? If "Yes," complete Schedule D, Part IV . . . . .	<b>9</b>	No
<b>10</b> Did the organization, directly or through a related organization, hold assets in temporarily restricted endowments, permanent endowments, or quasi endowments? If "Yes," complete Schedule D, Part V . . . . .	<b>10</b>	No
<b>11</b> If the organization's answer to any of the following questions is "Yes," then complete Schedule D, Parts VI, VII, VIII, IX, or X, as applicable.		
<b>a</b> Did the organization report an amount for land, buildings, and equipment in Part X, line 10? If "Yes," complete Schedule D, Part VI. . . . .	<b>11a</b>	No
<b>b</b> Did the organization report an amount for investments—other securities in Part X, line 12 that is 5% or more of its total assets reported in Part X, line 16? If "Yes," complete Schedule D, Part VII . . . . .	<b>11b</b>	No
<b>c</b> Did the organization report an amount for investments—program related in Part X, line 13 that is 5% or more of its total assets reported in Part X, line 16? If "Yes," complete Schedule D, Part VIII . . . . .	<b>11c</b>	No
<b>d</b> Did the organization report an amount for other assets in Part X, line 15 that is 5% or more of its total assets reported in Part X, line 16? If "Yes," complete Schedule D, Part IX . . . . .	<b>11d</b>	No
<b>e</b> Did the organization report an amount for other liabilities in Part X, line 25? If "Yes," complete Schedule D, Part X . . . . .	<b>11e</b>	No
<b>f</b> Did the organization's separate or consolidated financial statements for the tax year include a footnote that addresses the organization's liability for uncertain tax positions under FIN 48 (ASC 740)? If "Yes," complete Schedule D, Part X . . . . .	<b>11f</b>	No
<b>12a</b> Did the organization obtain separate, independent audited financial statements for the tax year? If "Yes," complete Schedule D, Parts XI and XII . . . . .	<b>12a</b>	No
<b>b</b> Was the organization included in consolidated, independent audited financial statements for the tax year? If "Yes," and if the organization answered "No" to line 12a, then completing Schedule D, Parts XI and XII is optional . . . . .	<b>12b</b>	No
<b>13</b> Is the organization a school described in section 170(b)(1)(A)(ii)? If "Yes," complete Schedule E . . . . .	<b>13</b>	No
<b>14a</b> Did the organization maintain an office, employees, or agents outside of the United States? . . . . .	<b>14a</b>	No
<b>b</b> Did the organization have aggregate revenues or expenses of more than \$10,000 from grantmaking, fundraising, business, investment, and program service activities outside the United States, or aggregate foreign investments valued at \$100,000 or more? If "Yes," complete Schedule F, Parts I and IV . . . . .	<b>14b</b>	No
<b>15</b> Did the organization report on Part IX, column (A), line 3, more than \$5,000 of grants or other assistance to or for any foreign organization? If "Yes," complete Schedule F, Parts II and IV . . . . .	<b>15</b>	No
<b>16</b> Did the organization report on Part IX, column (A), line 3, more than \$5,000 of aggregate grants or other assistance to or for foreign individuals? If "Yes," complete Schedule F, Parts III and IV . . . . .	<b>16</b>	No
<b>17</b> Did the organization report a total of more than \$15,000 of expenses for professional fundraising services on Part IX, column (A), lines 6 and 11e? If "Yes," complete Schedule G, Part I. See instructions. . . . .	<b>17</b>	No
<b>18</b> Did the organization report more than \$15,000 total of fundraising event gross income and contributions on Part VIII, lines 1c and 8a? If "Yes," complete Schedule G, Part II . . . . .	<b>18</b>	No
<b>19</b> Did the organization report more than \$15,000 of gross income from gaming activities on Part VIII, line 9a? If "Yes," complete Schedule G, Part III . . . . .	<b>19</b>	No
<b>20a</b> Did the organization operate one or more hospital facilities? If "Yes," complete Schedule H . . . . .	<b>20a</b>	No
<b>b</b> If "Yes" to line 20a, did the organization attach a copy of its audited financial statements to this return? . . . . .	<b>20b</b>	
<b>21</b> Did the organization report more than \$5,000 of grants or other assistance to any domestic organization or domestic government on Part IX, column (A), line 1? If "Yes," complete Schedule I, Parts I and II . . . . .	<b>21</b>	No



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Page 4

## Part IV Checklist of Required Schedules (continued)

	Yes	No
<b>22</b> Did the organization report more than \$5,000 of grants or other assistance to or for domestic individuals on Part IX, column (A), line 2? <i>If "Yes," complete Schedule I, Parts I and III . . . . .</i>	<b>22</b>	No
<b>23</b> Did the organization answer "Yes" to Part VII, Section A, line 3, 4, or 5, about compensation of the organization's current and former officers, directors, trustees, key employees, and highest compensated employees? <i>If "Yes," complete Schedule J . . . . .</i>	<b>23</b>	No
<b>24a</b> Did the organization have a tax-exempt bond issue with an outstanding principal amount of more than \$100,000 as of the last day of the year, that was issued after December 31, 2002? <i>If "Yes," answer lines 24b through 24d and complete Schedule K. If "No," go to line 25a . . . . .</i>	<b>24a</b>	No
<b>b</b> Did the organization invest any proceeds of tax-exempt bonds beyond a temporary period exception? . . . . .	<b>24b</b>	
<b>c</b> Did the organization maintain an escrow account other than a refunding escrow at any time during the year to defease any tax-exempt bonds? . . . . .	<b>24c</b>	
<b>d</b> Did the organization act as an "on behalf of" issuer for bonds outstanding at any time during the year? . . . . .	<b>24d</b>	
<b>25a Section 501(c)(3), 501(c)(4), and 501(c)(29) organizations.</b> Did the organization engage in an excess benefit transaction with a disqualified person during the year? <i>If "Yes," complete Schedule L, Part I . . . . .</i>	<b>25a</b>	No
<b>b</b> Is the organization aware that it engaged in an excess benefit transaction with a disqualified person in a prior year, and that the transaction has not been reported on any of the organization's prior Forms 990 or 990-EZ? <i>If "Yes," complete Schedule L, Part I . . . . .</i>	<b>25b</b>	No
<b>26</b> Did the organization report any amount on Part X, line 5 or 22 for receivables from or payables to any current or former officer, director, trustee, key employee, creator or founder, substantial contributor, or 35% controlled entity or family member of any of these persons? <i>If "Yes," complete Schedule L, Part II . . . . .</i>	<b>26</b>	No
<b>27</b> Did the organization provide a grant or other assistance to any current or former officer, director, trustee, key employee, creator or founder, substantial contributor, or employee thereof, a grant selection committee member, or to a 35% controlled entity (including an employee thereof) or family member of any of these persons? <i>If "Yes," complete Schedule L, Part III . . . . .</i>	<b>27</b>	No
<b>28</b> Was the organization a party to a business transaction with one of the following parties (see the Schedule L, Part IV instructions for applicable filing thresholds, conditions, and exceptions):		
<b>a</b> A current or former officer, director, trustee, key employee, creator or founder, or substantial contributor? <i>If "Yes," complete Schedule L, Part IV . . . . .</i>	<b>28a</b>	No
<b>b</b> A family member of any individual described in line 28a? <i>If "Yes," complete Schedule L, Part IV . . . . .</i>	<b>28b</b>	No
<b>c</b> A 35% controlled entity of one or more individuals and/or organizations described in line 28a or 28b? <i>If "Yes," complete Schedule L, Part IV . . . . .</i>	<b>28c</b>	No
<b>29</b> Did the organization receive more than \$25,000 in non-cash contributions? <i>If "Yes," complete Schedule M . . . . .</i>	<b>29</b>	No
<b>30</b> Did the organization receive contributions of art, historical treasures, or other similar assets, or qualified conservation contributions? <i>If "Yes," complete Schedule M . . . . .</i>	<b>30</b>	No
<b>31</b> Did the organization liquidate, terminate, or dissolve and cease operations? <i>If "Yes," complete Schedule N, Part I . . . . .</i>	<b>31</b>	No
<b>32</b> Did the organization sell, exchange, dispose of, or transfer more than 25% of its net assets? <i>If "Yes," complete Schedule N, Part II . . . . .</i>	<b>32</b>	No
<b>33</b> Did the organization own 100% of an entity disregarded as separate from the organization under Regulations sections 301.7701-2 and 301.7701-3? <i>If "Yes," complete Schedule R, Part I . . . . .</i>	<b>33</b>	No
<b>34</b> Was the organization related to any tax-exempt or taxable entity? <i>If "Yes," complete Schedule R, Part II, III, or IV, and Part V, line 1 . . . . .</i>	<b>34</b>	No
<b>35a</b> Did the organization have a controlled entity within the meaning of section 512(b)(13)?	<b>35a</b>	No
<b>b</b> If 'Yes' to line 35a, did the organization receive any payment from or engage in any transaction with a controlled entity within the meaning of section 512(b)(13)? <i>If "Yes," complete Schedule R, Part V, line 2 . . . . .</i>	<b>35b</b>	
<b>36 Section 501(c)(3) organizations.</b> Did the organization make any transfers to an exempt non-charitable related organization? <i>If "Yes," complete Schedule R, Part V, line 2 . . . . .</i>	<b>36</b>	
<b>37</b> Did the organization conduct more than 5% of its activities through an entity that is not a related organization and that is treated as a partnership for federal income tax purposes? <i>If "Yes," complete Schedule R, Part VI . . . . .</i>	<b>37</b>	No
<b>38</b> Did the organization complete Schedule O and provide explanations on Schedule O for Part VI, lines 11b and 19? <b>Note.</b> All Form 990 filers are required to complete Schedule O. . . . .	<b>38</b>	Yes

## Part V Statements Regarding Other IRS Filings and Tax Compliance

Check if Schedule O contains a response or note to any line in this Part V . . . . . ☐

	Yes	No
<b>1a</b> Enter the number reported in box 3 of Form 1096. Enter -0- if not applicable . . . . .	<b>1a</b>	1
<b>b</b> Enter the number of Forms W-2G included on line 1a. Enter -0- if not applicable . . . . .	<b>1b</b>	0
<b>c</b> Did the organization comply with backup withholding rules for reportable payments to vendors and reportable gaming . . . . .		

Form 990 (2022)

Page 5

## Part V Statements Regarding Other IRS Filings and Tax Compliance (continued)

<b>2a</b> Enter the number of employees reported on Form W-3, Transmittal of Wage and Tax Statements, filed for the calendar year ending with or within the year covered by this return . . . . .	<b>2a</b> 0			
<b>b</b> If at least one is reported on line 2a, did the organization file all required federal employment tax returns?	<b>2b</b>			
<b>3a</b> Did the organization have unrelated business gross income of \$1,000 or more during the year? . . .	<b>3a</b> No			
<b>b</b> If "Yes," has it filed a Form 990-T for this year? If "No" to line 3b, provide an explanation in Schedule O . . .	<b>3b</b>			
<b>4a</b> At any time during the calendar year, did the organization have an interest in, or a signature or other authority over, a financial account in a foreign country (such as a bank account, securities account, or other financial account)? . . .	<b>4a</b> No			
<b>b</b> If "Yes," enter the name of the foreign country: <u>See instructions for filing requirements for FinCEN Form 114, Report of Foreign Bank and Financial Accounts (FBAR).</u>				
<b>5a</b> Was the organization a party to a prohibited tax shelter transaction at any time during the tax year? . . .	<b>5a</b> No			
<b>b</b> Did any taxable party notify the organization that it was or is a party to a prohibited tax shelter transaction?	<b>5b</b> No			
<b>c</b> If "Yes," to line 5a or 5b, did the organization file Form 8886-T? . . . . .	<b>5c</b>			
<b>6a</b> Does the organization have annual gross receipts that are normally greater than \$100,000, and did the organization solicit any contributions that were not tax deductible as charitable contributions? . . .	<b>6a</b> Yes			
<b>b</b> If "Yes," did the organization include with every solicitation an express statement that such contributions or gifts were not tax deductible? . . . . .	<b>6b</b> Yes			
<b>7 Organizations that may receive deductible contributions under section 170(c).</b>				
<b>a</b> Did the organization receive a payment in excess of \$75 made partly as a contribution and partly for goods and services provided to the payor? . . . . .	<b>7a</b>			
<b>b</b> If "Yes," did the organization notify the donor of the value of the goods or services provided? . . . . .	<b>7b</b>			
<b>c</b> Did the organization sell, exchange, or otherwise dispose of tangible personal property for which it was required to file Form 8282? . . . . .	<b>7c</b>			
<b>d</b> If "Yes," indicate the number of Forms 8282 filed during the year . . . . .	<b>7d</b>			
<b>e</b> Did the organization receive any funds, directly or indirectly, to pay premiums on a personal benefit contract?	<b>7e</b>			
<b>f</b> Did the organization, during the year, pay premiums, directly or indirectly, on a personal benefit contract? . .	<b>7f</b>			
<b>g</b> If the organization received a contribution of qualified intellectual property, did the organization file Form 8899 as required? . . . . .	<b>7g</b>			
<b>h</b> If the organization received a contribution of cars, boats, airplanes, or other vehicles, did the organization file a Form 1098-C? . . . . .	<b>7h</b>			
<b>8 Sponsoring organizations maintaining donor advised funds.</b> Did a donor advised fund maintained by the sponsoring organization have excess business holdings at any time during the year? . . . . .				
<b>9 Sponsoring organizations maintaining donor advised funds.</b>				
<b>a</b> Did the sponsoring organization make any taxable distributions under section 4966? . . . . .	<b>9a</b>			
<b>b</b> Did the sponsoring organization make a distribution to a donor, donor advisor, or related person? . . .	<b>9b</b>			
<b>10 Section 501(c)(7) organizations.</b> Enter:				
<b>a</b> Initiation fees and capital contributions included on Part VIII, line 12 . . .	<b>10a</b>			
<b>b</b> Gross receipts, included on Form 990, Part VIII, line 12, for public use of club facilities	<b>10b</b>			
<b>11 Section 501(c)(12) organizations.</b> Enter:				
<b>a</b> Gross income from members or shareholders . . . . .	<b>11a</b>			
<b>b</b> Gross income from other sources. (Do not net amounts due or paid to other sources against amounts due or received from them.) . . . . .	<b>11b</b>			
<b>12a Section 4947(a)(1) non-exempt charitable trusts.</b> Is the organization filing Form 990 in lieu of Form 1041?				
<b>b</b> If "Yes," enter the amount of tax-exempt interest received or accrued during the year.	<b>12b</b>			
<b>13 Section 501(c)(29) qualified nonprofit health insurance issuers.</b>				
<b>a</b> Is the organization licensed to issue qualified health plans in more than one state? . . . . . <b>Note.</b> See the instructions for additional information the organization must report on Schedule O.	<b>13a</b>			
<b>b</b> Enter the amount of reserves the organization is required to maintain by the states in which the organization is licensed to issue qualified health plans . . . . .	<b>13b</b>			
<b>c</b> Enter the amount of reserves on hand . . . . .	<b>13c</b>			
<b>14a</b> Did the organization receive any payments for indoor tanning services during the tax year? . . . . .				
<b>b</b> If "Yes," has it filed a Form 720 to report these payments? If "No," provide an explanation in Schedule O . .	<b>14b</b> No			



15	Is the organization subject to the section 4960 tax on payment(s) of more than \$1,000,000 in remuneration or excess parachute payment(s) during the year? . . . . . If "Yes," see the instructions and file Form 4720, Schedule N.	15		No
16	Is the organization an educational institution subject to the section 4968 excise tax on net investment income? . . . If "Yes," complete Form 4720, Schedule O.	16		No
17	<b>Section 501(c)(21) organizations.</b> Did the trust, or any disqualified or other person engage in any activities that would result in the imposition of an excise tax under section 4951, 4952, or 4953? . . . . . If "Yes," complete Form 6069.	17		

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**Part VI Governance, Management, and Disclosure.** For each "Yes" response to lines 2 through 7b below, and for a "No" response to lines 8a, 8b, or 10b below, describe the circumstances, processes, or changes in Schedule O. See instructions.  
Check if Schedule O contains a response or note to any line in this Part VI ☒

**Section A. Governing Body and Management**

		Yes	No
<b>1a</b> Enter the number of voting members of the governing body at the end of the tax year . . . . . If there are material differences in voting rights among members of the governing body, or if the governing body delegated broad authority to an executive committee or similar committee, explain in Schedule O.	<b>1a</b> 3		
<b>b</b> Enter the number of voting members included in line 1a, above, who are independent . . . . .	<b>1b</b> 3		
<b>2</b> Did any officer, director, trustee, or key employee have a family relationship or a business relationship with any other officer, director, trustee, or key employee? . . . . .	<b>2</b>		No
<b>3</b> Did the organization delegate control over management duties customarily performed by or under the direct supervision of officers, directors or trustees, or key employees to a management company or other person? . . . . .	<b>3</b>		No
<b>4</b> Did the organization make any significant changes to its governing documents since the prior Form 990 was filed? . . . . .	<b>4</b>		No
<b>5</b> Did the organization become aware during the year of a significant diversion of the organization's assets? . . . . .	<b>5</b>		No
<b>6</b> Did the organization have members or stockholders? . . . . .	<b>6</b>		No
<b>7a</b> Did the organization have members, stockholders, or other persons who had the power to elect or appoint one or more members of the governing body? . . . . .	<b>7a</b>		No
<b>b</b> Are any governance decisions of the organization reserved to (or subject to approval by) members, stockholders, or persons other than the governing body? . . . . .	<b>7b</b>		No
<b>8</b> Did the organization contemporaneously document the meetings held or written actions undertaken during the year by the following:			
<b>a</b> The governing body? . . . . .	<b>8a</b>	Yes	
<b>b</b> Each committee with authority to act on behalf of the governing body? . . . . .	<b>8b</b>	Yes	
<b>9</b> Is there any officer, director, trustee, or key employee listed in Part VII, Section A, who cannot be reached at the organization's mailing address? If "Yes," provide the names and addresses in Schedule O . . . . .	<b>9</b>		No

**Section B. Policies** (This Section B requests information about policies not required by the Internal Revenue Code.)

	Yes	No
<b>10a</b> Did the organization have local chapters, branches, or affiliates? . . . . .	<b>10a</b>	No
<b>b</b> If "Yes," did the organization have written policies and procedures governing the activities of such chapters, affiliates, and branches to ensure their operations are consistent with the organization's exempt purposes? . . . . .	<b>10b</b>	
<b>11a</b> Has the organization provided a complete copy of this Form 990 to all members of its governing body before filing the form? . . . . .	<b>11a</b> Yes	
<b>b</b> Describe on Schedule O the process, if any, used by the organization to review this Form 990. . . . .		
<b>12a</b> Did the organization have a written conflict of interest policy? If "No," go to line 13 . . . . .	<b>12a</b> Yes	
<b>b</b> Were officers, directors, or trustees, and key employees required to disclose annually interests that could give rise to conflicts? . . . . .	<b>12b</b>	No
<b>c</b> Did the organization regularly and consistently monitor and enforce compliance with the policy? If "Yes," describe on Schedule O how this was done . . . . .	<b>12c</b>	No
<b>13</b> Did the organization have a written whistleblower policy? . . . . .	<b>13</b> Yes	
<b>14</b> Did the organization have a written document retention and destruction policy? . . . . .	<b>14</b> Yes	
<b>15</b> Did the process for determining compensation of the following persons include a review and approval by independent persons, comparability data, and contemporaneous substantiation of the deliberation and decision?		
<b>a</b> The organization's CEO, Executive Director, or top management official . . . . .	<b>15a</b>	No
<b>b</b> Other officers or key employees of the organization . . . . .	<b>15b</b>	No
If "Yes" to line 15a or 15b, describe the process on Schedule O. See instructions.		
<b>16a</b> Did the organization invest in, contribute assets to, or participate in a joint venture or similar arrangement with a taxable entity during the year? . . . . .	<b>16a</b>	No
<b>b</b> If "Yes," did the organization follow a written policy or procedure requiring the organization to evaluate its participation in joint venture arrangements under applicable federal tax law, and take steps to safeguard the organization's exempt status with respect to such arrangements? . . . . .		

## Section C. Disclosure

**17** List the states with which a copy of this Form 990 is required to be filed. 

MO

**18** Section 6104 requires an organization to make its Form 1023 (1024 or 1024-A, if applicable), 990, and 990-T (section 501(c)(3)s only) available for public inspection. Indicate how you made these available. Check all that apply.

☐ Own website ☐ Another's website ☒ Upon request ☐ Other (explain in Schedule O)

**19** Describe in Schedule O whether (and if so, how) the organization made its governing documents, conflict of interest policy, and financial statements available to the public during the tax year.

**20** State the name, address, and telephone number of the person who possesses the organization's books and records:

►RIGHTSIDE COMPLIANCE PO BOX 341027 AUSTIN, TX 78734 (703) 587-1469

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## Part VII Compensation of Officers, Directors, Trustees, Key Employees, Highest Compensated Employees, and Independent Contractors

Check if Schedule O contains a response or note to any line in this Part VII ☐

## Section A. Officers, Directors, Trustees, Key Employees, and Highest Compensated Employees

**1a** Complete this table for all persons required to be listed. Report compensation for the calendar year ending with or within the organization's tax year.

■ List all of the organization's **current** officers, directors, trustees (whether individuals or organizations), regardless of amount of compensation. Enter -0- in columns (D), (E), and (F) if no compensation was paid.

● List all of the organization's **current** key employees, if any. See the instructions for definition of "key employee."

● List the organization's five **current** highest compensated employees (other than an officer, director, trustee or key employee) who received reportable compensation (box 5 of Form W-2, box 6 of Form 1099-MISC, and/or box 1 of Form 1099-NEC) of more than \$100,000 from the organization and any related organizations.

• List all of the organization's **former** officers, key employees, or highest compensated employees who received more than \$100,000 of reportable compensation from the organization and any related organizations.

• List all of the organization's **former directors or trustees** that received, in the capacity as a former director or trustee of the organization, more than \$10,000 of reportable compensation from the organization and any related organizations.

See the instructions for the order in which to list the persons above.

☒ Check this box if neither the organization nor any related organization compensated any current officer, director, or trustee.

[illegible]





(A) Name and business address	(B) Description of services	(C) Compensation
MEDIA AD VENTURES 8136 OLD KEENE MILL RD STE A-300 SPRINGFIELD, VA 22152	MEDIA ADVERTISING	600,000
<b>2</b> Total number of independent contractors (including but not limited to those listed above) who received more than \$100,000 of compensation from the organization ▶ <b>1</b>		

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## Part VIII

**Statement of Revenue**

Check if Schedule O contains a response or note to any line in this Part VIII . . . . .

☐

	(A) Total revenue	(B) Related or exempt function revenue	(C) Unrelated business revenue	(D) Revenue excluded from tax under sections 512 - 514
--	----------------------	--	---	--

Coordinated campaigns . . .	<b>1a</b>
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Membership dues . . .	<b>1b</b>
-----------------------	-----------

Randaising events . . .	<b>1c</b>
-------------------------	-----------

Related organizations	<b>1d</b>
-----------------------	-----------

Government grants (contributions)	<b>1e</b>
-----------------------------------	-----------

All other contributions, gifts, grants, and similar amounts not included above	<b>1f</b>
--	-----------

650,000

<b>g</b> Noncash contributions included in lines 1a - 1f:\$	<b>1g</b>
--	-----------

**h Total.** Add lines 1a-1f . . . . . ▶ 650,000

2a Program Service Revenue		Business Code				
<b>f</b> All other program service revenue.						

**g Total.** Add lines 2a-2f. . . . . ▶

<b>3</b> Investment income (including dividends, interest, and other similar amounts) . . . . .				
<b>4</b> Income from investment of tax-exempt bond proceeds ▶				
<b>5</b> Royalties . . . . . ▶				
	(i) Real	(ii) Personal		
<b>6a</b> Gross rents	<b>6a</b>			
<b>b</b> Less: rental expenses	<b>6b</b>			
<b>c</b> Rental income				

6c					
d Net rental income or (loss) . . . . . ▶					
7a Gross amount from sales of assets other than inventory	(i) Securities	(ii) Other			
	7b Less: cost or other basis and sales expenses				
	7c Gain or (loss)				
d Net gain or (loss) . . . . . ▶					
a Gross income from fundraising events (not including \$ _____ of contributions reported on line 1c). See Part IV, line 18 . . . . .		8a			
b Less: direct expenses . . . . .		8b			
c Net income or (loss) from fundraising events . . . . . ▶					
9a Gross income from gaming activities. See Part IV, line 19 . . . . .		9a			
b Less: direct expenses . . . . .		9b			
c Net income or (loss) from gaming activities . . . . . ▶					
10a Gross sales of inventory, less returns and allowances . . . . .		10a			
b Less: cost of goods sold . . . . .		10b			
c Net income or (loss) from sales of inventory . . . . . ▶					
11a		Business Code			
b					
c					
d All other revenue . . . . .					
e Total. Add lines 11a-11d . . . . . ▶					
12 Total revenue. See instructions . . . . . ▶			650,000	0	0

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Part IX Statement of Functional Expenses				
Section 501(c)(3) and 501(c)(4) organizations must complete all columns. All other organizations must complete column (A).				
Check if Schedule O contains a response or note to any line in this Part IX . . . . . <input type="checkbox"/>				
Do not include amounts reported on lines 6b, 7b, 8b, 9b, and 10b of Part VIII.	(A) Total expenses	(B) Program service expenses	(C) Management and general expenses	(D) Fundraising expenses
1 Grants and other assistance to domestic organizations and domestic governments. See Part IV, line 21 . . . . .				
2 Grants and other assistance to domestic individuals. See Part IV, line 22 . . . . .				
3 Grants and other assistance to foreign organizations, foreign governments, and foreign individuals. See Part IV, lines 15 and 16. . . . .				
4 Benefits paid to or for members . . . . .				
5 Compensation of current officers, directors, trustees, and key employees . . . . .				
6 Compensation not included above, to disqualified persons (as defined under section 4958(f)(1)) and persons described in section 4958(c)(3)(B) . . . . .				

Section 4958(c)(3)(B) . . . . .				
<b>7</b> Other salaries and wages . . . . .				
<b>8</b> Pension plan accruals and contributions (include section 401(k) and 403(b) employer contributions) . . . . .				
<b>9</b> Other employee benefits . . . . .				
<b>10</b> Payroll taxes . . . . .				
<b>11</b> Fees for services (non-employees):				
<b>a</b> Management . . . . .				
<b>b</b> Legal . . . . .	7,337		7,337	
<b>c</b> Accounting . . . . .				
<b>d</b> Lobbying . . . . .				
<b>e</b> Professional fundraising services. See Part IV, line 17				
<b>f</b> Investment management fees . . . . .				
<b>g</b> Other (If line 11g amount exceeds 10% of line 25, column (A) amount, list line 11g expenses on Schedule O)	3,638		3,638	
<b>12</b> Advertising and promotion . . . . .	9,780	9,780		
<b>13</b> Office expenses . . . . .				
<b>14</b> Information technology . . . . .				
<b>15</b> Royalties . . . . .				
<b>16</b> Occupancy . . . . .				
<b>17</b> Travel . . . . .				
<b>18</b> Payments of travel or entertainment expenses for any federal, state, or local public officials . . . . .				
<b>19</b> Conferences, conventions, and meetings . . . . .				
<b>20</b> Interest . . . . .				
<b>21</b> Payments to affiliates . . . . .				
<b>22</b> Depreciation, depletion, and amortization . . . . .				
<b>23</b> Insurance . . . . .				
<b>24</b> Other expenses. Itemize expenses not covered above (List miscellaneous expenses in line 24e. If line 24e amount exceeds 10% of line 25, column (A) amount, list line 24e expenses on Schedule O.)				
<b>a</b> ISSUE ADVOCACY	600,000	600,000		
<b>b</b> BANK FEES	310		310	
<b>c</b> SUBSCRIPTIONS	186		186	
<b>d</b>				
<b>e</b> All other expenses				
<b>25 Total functional expenses.</b> Add lines 1 through 24e	621,251	609,780	11,471	0
<b>26 Joint costs.</b> Complete this line only if the organization reported in column (B) joint costs from a combined educational campaign and fundraising solicitation. Check here <input type="checkbox"/> if following SOP 98-2 (ASC 958-720).				

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Part X **Balance Sheet**

Check if Schedule O contains a response or note to any line in this Part IX ☐

	(A) Beginning of year		(B) End of year
<b>1</b> Cash—non-interest-bearing . . . . .	0	<b>1</b>	28,749
<b>2</b> Savings and temporary cash investments . . . . .		<b>2</b>	
<b>3</b> Pledges and grants receivable, net . . . . .		<b>3</b>	
<b>4</b> Accounts receivable, net . . . . .		<b>4</b>	
<b>5</b> Loans and other receivables from any current or former officer, director, trustee, key employee, creator or founder, substantial contributor, or 35% controlled entity or family member of any of these persons		<b>5</b>	
<b>6</b> Loans and other receivables from other disqualified persons (as defined under section 4958(f)(1)), and persons described in section 4958(c)(3)(B) . . . . .		<b>6</b>	

Assets	7	Notes and loans receivable, net . . . . .		7		
	8	Inventories for sale or use . . . . .		8		
	9	Prepaid expenses and deferred charges . . . . .		9		
	10a	Land, buildings, and equipment: cost or other basis. Complete Part VI of Schedule D	10a			
	b	Less: accumulated depreciation	10b		10c	
	11	Investments—publicly traded securities . . . . .		11		
	12	Investments—other securities. See Part IV, line 11 . . . . .		12		
	13	Investments—program-related. See Part IV, line 11 . . . . .		13		
	14	Intangible assets . . . . .		14		
	15	Other assets. See Part IV, line 11 . . . . .		15		
	16	<b>Total assets.</b> Add lines 1 through 15 (must equal line 33) . . . . .	0	16	28,749	
	Liabilities	17	Accounts payable and accrued expenses . . . . .		17	
		18	Grants payable . . . . .		18	
		19	Deferred revenue . . . . .		19	
		20	Tax-exempt bond liabilities . . . . .		20	
		21	Escrow or custodial account liability. Complete Part IV of Schedule D		21	
22		Loans and other payables to any current or former officer, director, trustee, key employee, creator or founder, substantial contributor, or 35% controlled entity or family member of any of these persons . . . . .		22		
23		Secured mortgages and notes payable to unrelated third parties . . . . .		23		
24		Unsecured notes and loans payable to unrelated third parties . . . . .		24		
25		Other liabilities (including federal income tax, payables to related third parties, and other liabilities not included on lines 17 - 24). Complete Part X of Schedule D		25		
26		<b>Total liabilities.</b> Add lines 17 through 25 . . . . .	0	26	0	
Net Assets or Fund Balances	<b>Organizations that follow FASB ASC 958, check here</b> <input type="checkbox"/> <b>and complete lines 27, 28, 32, and 33.</b>					
	27	Net assets without donor restrictions . . . . .		27		
	28	Net assets with donor restrictions . . . . .		28		
	<b>Organizations that do not follow FASB ASC 958, check here</b> <input checked="" type="checkbox"/> <b>and complete lines 29 through 33.</b>					
	29	Capital stock or trust principal, or current funds . . . . .	0	29	0	
	30	Paid-in or capital surplus, or land, building or equipment fund . . . . .	0	30	0	
	31	Retained earnings, endowment, accumulated income, or other funds	0	31	28,749	
	32	<b>Total net assets or fund balances</b> . . . . .	0	32	28,749	
	33	<b>Total liabilities and net assets/fund balances</b> . . . . .	0	33	28,749	

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Part XI **Reconciliation of Net Assets**

Check if Schedule O contains a response or note to any line in this Part XI ☐

1	Total revenue (must equal Part VIII, column (A), line 12) . . . . .	1	650,000
2	Total expenses (must equal Part IX, column (A), line 25) . . . . .	2	621,251
3	Revenue less expenses. Subtract line 2 from line 1 . . . . .	3	28,749
4	Net assets or fund balances at beginning of year (must equal Part X, line 32, column (A)) . . . . .	4	0
5	Net unrealized gains (losses) on investments . . . . .	5	
6	Donated services and use of facilities . . . . .	6	
7	Investment expenses . . . . .	7	
8	Prior period adjustments . . . . .	8	
9	Other changes in net assets or fund balances (explain in Schedule O) . . . . .	9	0
10	<b>Net assets or fund balances at end of year.</b> Combine lines 3 through 9 (must equal Part X, line 32, column (B))	10	28,749

Part XII **Financial Statements and Reporting**

Check if Schedule O contains a response or note to any line in this Part XII ☐

1	Accounting method used to prepare the Form 990:	<input checked="" type="checkbox"/> Cash	<input type="checkbox"/> Accrual	<input type="checkbox"/> Other		Yes	No
---	---	--	----------------------------------	--------------------------------	--	-----	----

Accounting method used to prepare the Form 990: Cash Accrual Other

If the organization changed its method of accounting from a prior year or checked "Other," explain on Schedule O.

**2a** Were the organization's financial statements compiled or reviewed by an independent accountant?

If "Yes," check a box below to indicate whether the financial statements for the year were compiled or reviewed on a separate basis, consolidated basis, or both:

☐ Separate basis ☐ Consolidated basis ☐ Both consolidated and separate basis

**b** Were the organization's financial statements audited by an independent accountant?

If "Yes," check a box below to indicate whether the financial statements for the year were audited on a separate basis, consolidated basis, or both:

☐ Separate basis ☐ Consolidated basis ☐ Both consolidated and separate basis

**c** If "Yes," to line 2a or 2b, does the organization have a committee that assumes responsibility for oversight of the audit, review, or compilation of its financial statements and selection of an independent accountant?

If the organization changed either its oversight process or selection process during the tax year, explain in Schedule O.

**3a** As a result of a federal award, was the organization required to undergo an audit or audits as set forth in the Uniform Guidance, 2 C.F.R. Part 200, Subpart F?

**b** If "Yes," did the organization undergo the required audit or audits? If the organization did not undergo the required audit or audits, explain why in Schedule O and describe any steps taken to undergo such audits.

<b>2a</b>		No
<b>2b</b>		No
<b>2c</b>		
<b>3a</b>		No
<b>3b</b>		

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**Additional Data**

**Return to Form**

**Software ID:**

**Software Version:**

**Form 990, Special Condition Description:**



efile Public Visual Render		ObjectID: 202323199349329862 - Submission: 2023-11-15		TIN: 88-2273990	
<b>Schedule B</b> (Form 990) Department of the Treasury Internal Revenue Service		<b>Schedule of Contributors</b> ▶ Attach to Form 990, 990-EZ, or 990-PF. ▶ Go to <a href="http://www.irs.gov/Form990">www.irs.gov/Form990</a> for the latest information.			OMB No. 1545-0047  <b>2022</b>
Name of the organization CONSERVATIVES NETWORK				Employer identification number 88-2273990	

Organization type (check one):

Filers of:

Section:

Form 990 or 990-EZ

- ☐ 501(c)( ) (enter number) organization
- ☐ 4947(a)(1) nonexempt charitable trust **not** treated as a private foundation
- ☐ 527 political organization

Form 990-PF

- ☐ 501(c)(3) exempt private foundation
- ☐ 4947(a)(1) nonexempt charitable trust treated as a private foundation
- ☐ 501(c)(3) taxable private foundation

Check if your organization is covered by the **General Rule** or a **Special Rule**.

**Note:** Only a section 501(c)(7), (8), or (10) organization can check boxes for both the General Rule and a Special Rule. See instructions.

**General Rule**

- ☐ For an organization filing Form 990, 990-EZ, or 990-PF that received, during the year, contributions totaling \$5,000 or more (in money or other property) from any one contributor. Complete Parts I and II. See instructions for determining a contributor's total contributions.

**Special Rules**

- ☐ For an organization described in section 501(c)(3) filing Form 990 or 990-EZ that met the 33<sup>1</sup>/<sub>3</sub>% support test of the regulations under sections 509(a)(1) and 170(b)(1)(A)(vi), that checked Schedule A (Form 990 or 990-EZ), Part II, line 13, 16a, or 16b, and that received from any one contributor, during the year, total contributions of the greater of (1) \$5,000 or (2) 2% of the amount on (i) Form 990, Part VIII, line 1h, or (ii) Form 990-EZ, line 1. Complete Parts I and II.
- ☐ For an organization described in section 501(c)(7), (8), or (10) filing Form 990 or 990-EZ that received from any one contributor, during the year, total contributions of more than \$1,000 *exclusively* for religious, charitable, scientific, literary, or educational purposes, or for the prevention of cruelty to children or animals. Complete Parts I, II, and III.
- ☐ For an organization described in section 501(c)(7), (8), or (10) filing Form 990 or 990-EZ that received from any one contributor, during the year, contributions *exclusively* for religious, charitable, etc., purposes, but no such contributions totaled more than \$1,000. If this box is checked, enter here the total contributions that were received during the year for an *exclusively* religious, charitable, etc., purpose. Don't complete any of the parts unless the **General Rule** applies to this organization because it received *nonexclusively* religious, charitable, etc., contributions totaling \$5,000 or more during the year . . . . . ▶ \$ \_\_\_\_\_

**Caution:** An organization that isn't covered by the General Rule and/or the Special Rules doesn't file Schedule B (Form 990, 990-EZ, or 990-PF), but it **must** answer "No" on Part IV, line 2, of its Form 990; or check the box on line H of its Form 990-EZ or on its Form 990PF, Part I, line 2, to certify that it doesn't meet the filing requirements of Schedule B (Form 990, 990-EZ, or 990-PF).

For Paperwork Reduction Act Notice, see the Instructions for Form 990, 990-EZ, or 990-PF.

Cat. No. 30613X

Schedule B (Form 990) (2022)

**Part I****Contributors****Contributors** (see instructions). Use duplicate copies of Part I if additional space is needed.

(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributions	(d) Type of contribution
RESTRICTED		\$ RESTRICTED	<input type="checkbox"/> Person <input type="checkbox"/> Payroll <input type="checkbox"/> Noncash (Complete Part II for noncash contributions.)
-		\$	<input type="checkbox"/> Person <input type="checkbox"/> Payroll <input type="checkbox"/> Noncash (Complete Part II for noncash contributions.)
-		\$	<input type="checkbox"/> Person <input type="checkbox"/> Payroll <input type="checkbox"/> Noncash (Complete Part II for noncash contributions.)
-		\$	<input type="checkbox"/> Person <input type="checkbox"/> Payroll <input type="checkbox"/> Noncash (Complete Part II for noncash contributions.)
-		\$	<input type="checkbox"/> Person <input type="checkbox"/> Payroll <input type="checkbox"/> Noncash (Complete Part II for noncash contributions.)
-		\$	<input type="checkbox"/> Person <input type="checkbox"/> Payroll <input type="checkbox"/> Noncash (Complete Part II for noncash contributions.)
-		\$	<input type="checkbox"/> Person <input type="checkbox"/> Payroll <input type="checkbox"/> Noncash (Complete Part II for noncash contributions.)

Schedule B (Form 990) (2022)

Schedule B (Form 990) (2022)

Page 3

Name of organization  
CONSERVATIVES NETWORK

Employer identification number

88-2273990

**Part II Noncash Property** (see instructions). Use duplicate copies of Part II if additional space is needed.

(a) No. from Part I	(b) Description of noncash property given	(c) FMV (or estimate) (See instructions)	(d) Date received
---------------------------	--	--	----------------------

-			\$	
(a) No. from Part I	(b) Description of noncash property given	(c) FMV (or estimate) (See instructions)	(d) Date received	
-			\$	
(a) No. from Part I	(b) Description of noncash property given	(c) FMV (or estimate) (See instructions)	(d) Date received	
-			\$	
(a) No. from Part I	(b) Description of noncash property given	(c) FMV (or estimate) (See instructions)	(d) Date received	
-			\$	
(a) No. from Part I	(b) Description of noncash property given	(c) FMV (or estimate) (See instructions)	(d) Date received	
-			\$	
(a) No. from Part I	(b) Description of noncash property given	(c) FMV (or estimate) (See instructions)	(d) Date received	
-			\$	

Schedule B (Form 990) (2022)

Schedule B (Form 990) (2022)

Page 4

Name of organization CONSERVATIVES NETWORK	Employer identification number 88-2273990
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**Part III** Exclusively religious, charitable, etc., contributions to organizations described in section 501(c)(7), (8), or (10) that total more than \$1,000 for the year from any one contributor. Complete columns (a) through (e) and the following line entry. For organizations completing Part III, enter the total of exclusively religious, charitable, etc., contributions of \$1,000 or less for the year. (Enter this information once. See instructions.) ▶ \$ \_\_\_\_\_

Use duplicate copies of Part III if additional space is needed.

(a) No. from Part I	(b) Purpose of gift	(c) Use of gift	(d) Description of how gift is held
-			
	(e) Transfer of gift		
	Transferee's name, address, and ZIP 4	Relationship of transferor to transferee	
(a) No. from Part I	(b) Purpose of gift	(c) Use of gift	(d) Description of how gift is held
-			
	(e) Transfer of gift		
	Transferee's name, address, and ZIP 4	Relationship of transferor to transferee	
(a) No. from Part I	(b) Purpose of gift	(c) Use of gift	(d) Description of how gift is held



Part I	(b) Purpose of gift	(c) Use of gift	(d) Description of how gift is held
	(e) Transfer of gift		
	Transferee's name, address, and ZIP 4		Relationship of transferor to transferee
(a) No. from Part I	(b) Purpose of gift	(c) Use of gift	(d) Description of how gift is held
	(e) Transfer of gift		
	Transferee's name, address, and ZIP 4		Relationship of transferor to transferee

Schedule B (Form 990) (2022)

## Additional Data

[Return to Form](#)

Software ID:  
Software Version:

<a href="#">efile Public Visual Render</a>	<b>ObjectID: 202323199349329862 - Submission: 2023-11-15</b>	<b>TIN: 88-2273990</b>
<b>SCHEDULE O</b> (Form 990)	<b>Supplemental Information to Form 990 or 990-EZ</b> Complete to provide information for responses to specific questions on Form 990 or 990-EZ or to provide any additional information. ▶ Attach to Form 990 or 990-EZ. ▶ Go to <a href="https://www.irs.gov/Form990">www.irs.gov/Form990</a> for the latest information.	OMB No. 1545-0047 <b>2022</b> Open to Public Inspection
Name of the organization CONSERVATIVES NETWORK		Employer identification number 88-2273990

Return Reference	Explanation
FORM 990, PART VI, SECTION B, LINE 11B	THE DRAFT 990 IS PRESENTED TO BOARD MEMBERS FOR THEIR REVIEW.
FORM 990, PART VI, SECTION C, LINE 19	THE ORGANIZATION'S GOVERNING DOCUMENTS, CONFLICT OF INTEREST POLICY, AND FINANCIAL STATEMENTS ARE NOT MADE AVAILABLE TO THE PUBLIC.

For Paperwork Reduction Act Notice, see the Instructions for Form 990 or 990-EZ.

Cat. No. 51056K

Schedule O (Form 990) 2022

## Additional Data

[Return to Form](#)

Software ID:  
Software Version:

# Exhibit 2

efile Public Visual Render		ObjectId: 202411579349300626 - Submission: 2024-06-05	TIN: 88-2273990
Form 990	Return of Organization Exempt From Income Tax		OMB No. 1545-0047
Under section 501(c), 527, or 4947(a)(1) of the Internal Revenue Code (except private foundations)		2023	
Do not enter social security numbers on this form as it may be made public.		Open to Public Inspection	
Go to <a href="http://www.irs.gov/Form990">www.irs.gov/Form990</a> for instructions and the latest information.			
Department of the Treasury Internal Revenue Service			

A For the 2023 calendar year, or tax year beginning 01-01-2023 , and ending 12-31-2023			
B Check if applicable: <input type="checkbox"/> Address change <input type="checkbox"/> Name change <input type="checkbox"/> Initial return <input type="checkbox"/> Final return/terminated <input type="checkbox"/> Amended return <input type="checkbox"/> Application pending		C Name of organization CONSERVATIVES NETWORK	
		D Employer identification number 88-2273990	
		E Telephone number (512) 354-1787	
		G Gross receipts \$ 0	
		F Name and address of principal officer: CHRISTOPHER CRANCER 14425 FALCON HEAD BLVD UNIT E100 AUSTIN, TX 78738	
I Tax-exempt status: <input type="checkbox"/> 501(c)(3) <input checked="" type="checkbox"/> 501(c) ( 4 ) (insert no.) <input type="checkbox"/> 4947(a)(1) or <input type="checkbox"/> 527		H(a) Is this a group return for subordinates? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
J Website: N/A		H(b) Are all subordinates included? <input type="checkbox"/> Yes <input type="checkbox"/> No	
		If "No," attach a list. See instructions.	
		H(c) Group exemption number	
K Form of organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Trust <input type="checkbox"/> Association <input type="checkbox"/> Other		L Year of formation: 2022	
		M State of legal domicile: MO	

Part I Summary				
Activities & Governance	1 Briefly describe the organization's mission or most significant activities: THE ORGANIZATION SPONSORED A MEDIA CAMPAIGN TO SUPPORT LAW ENFORCEMENT IN MISSOURI.			
	2 Check this box <input type="checkbox"/>			
	3 Number of voting members of the governing body (Part VI, line 1a) . . . . . 3 2			
	4 Number of independent voting members of the governing body (Part VI, line 1b) . . . . . 4 2			
	5 Total number of individuals employed in calendar year 2023 (Part V, line 2a) . . . . . 5 0			
6 Total number of volunteers (estimate if necessary) . . . . . 6 2				
7a Total unrelated business revenue from Part VIII, column (C), line 12 . . . . . 7a 0				
b Net unrelated business taxable income from Form 990-T, Part I, line 11 . . . . . 7b 0				
Revenue	8 Contributions and grants (Part VIII, line 1h) . . . . .		Prior Year	Current Year
	9 Program service revenue (Part VIII, line 2g) . . . . .		650,000	0
	10 Investment income (Part VIII, column (A), lines 3, 4, and 7d ) . . . . .		0	0
	11 Other revenue (Part VIII, column (A), lines 5, 6d, 8c, 9c, 10c, and 11e)		0	0
	12 Total revenue—add lines 8 through 11 (must equal Part VIII, column (A), line 12)		650,000	0
Expenses	13 Grants and similar amounts paid (Part IX, column (A), lines 1–3 ) . . . . .		0	0
	14 Benefits paid to or for members (Part IX, column (A), line 4) . . . . .		0	0
	15 Salaries, other compensation, employee benefits (Part IX, column (A), lines 5–10)		0	0
	16a Professional fundraising fees (Part IX, column (A), line 11e) . . . . .		0	0
	b Total fundraising expenses (Part IX, column (D), line 25) 0			
	17 Other expenses (Part IX, column (A), lines 11a–11d, 11f–24e) . . . . .		621,251	26,641
	18 Total expenses. Add lines 13–17 (must equal Part IX, column (A), line 25)		621,251	26,641
	19 Revenue less expenses. Subtract line 18 from line 12 . . . . .		28,749	-26,641
Net Assets or Fund Balances			Beginning of Current Year	End of Year
	20 Total assets (Part X, line 16) . . . . .		28,749	2,108
	21 Total liabilities (Part X, line 26) . . . . .		0	0
	22 Net assets or fund balances. Subtract line 21 from line 20 . . . . .		28,749	2,108

Part II Signature Block	
Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.	

Sign Here

Signature of officer  
MATTHEW BELZ SECRETARY

Type or print name and title

2024-06-04  
Date

Paid Preparer Use Only

Print/Type preparer's name

Preparer's signature

Date  
2024-06-03

Check ☐ if self-employed

PTIN  
P01257722

Firm's name  
ATCHLEY & ASSOCIATES LLP

Firm's EIN  
74-2920819

Firm's address  
1005 LA POSADA DRIVE  
AUSTIN, TX 78752

Phone no. (512) 346-2086

May the IRS discuss this return with the preparer shown above? See Instructions. ☒ Yes ☐ No

**For Paperwork Reduction Act Notice, see the separate instructions.** Cat. No. 11282Y Form **990** (2023)

Part III

Statement of Program Service Accomplishments

Check if Schedule O contains a response or note to any line in this Part III

☐

1

Briefly describe the organization's mission:  
THE ORGANIZATION'S MISSION IS TO ADVANCE CONSERVATIVE POLICIES IN THE STATE OF MISSOURI.

2

Did the organization undertake any significant program services during the year which were not listed on the prior Form 990 or 990-EZ?  
If "Yes," describe these new services on Schedule O.

☐ Yes

☒ No

3

Did the organization cease conducting, or make significant changes in how it conducts, any program services?  
If "Yes," describe these changes on Schedule O.

☐ Yes

☒ No

4

Describe the organization's program service accomplishments for each of its three largest program services, as measured by expenses. Section 501(c)(3) and 501(c)(4) organizations are required to report the amount of grants and allocations to others, the total expenses, and revenue, if any, for each program service reported.

4a

(Code: ) (Expenses \$ including grants of \$ ) (Revenue \$ )  
THE ORGANIZATION SPONSORED TELEVISION ADVERTISING TO SUPPORT PRO LAW ENFORCEMENT POLICIES IN MISSOURI.

4b

(Code: ) (Expenses \$ including grants of \$ ) (Revenue \$ )

4c

(Code: ) (Expenses \$ including grants of \$ ) (Revenue \$ )

4d

Other program services (Describe in Schedule O.)  
(Expenses \$ including grants of \$ ) (Revenue \$ )

4e

Total program service expenses



Part IV Checklist of Required Schedules		Yes	No
<b>1</b>	Is the organization described in section 501(c)(3) or 4947(a)(1) (other than a private foundation)? <i>If "Yes," complete Schedule A</i> . . . . .	<b>1</b>	No
<b>2</b>	Is the organization required to complete <i>Schedule B, Schedule of Contributors</i> ? See instructions. . . . .	<b>2</b>	No
<b>3</b>	Did the organization engage in direct or indirect political campaign activities on behalf of or in opposition to candidates for public office? <i>If "Yes," complete Schedule C, Part I</i> . . . . .	<b>3</b>	No
<b>4</b>	<b>Section 501(c)(3) organizations.</b> Did the organization engage in lobbying activities, or have a section 501(h) election in effect during the tax year? <i>If "Yes," complete Schedule C, Part II</i> . . . . .	<b>4</b>	
<b>5</b>	Is the organization a section 501(c)(4), 501(c)(5), or 501(c)(6) organization that receives membership dues, assessments, or similar amounts as defined in Rev. Proc. 98-19? <i>If "Yes," complete Schedule C, Part III</i> . . . . .	<b>5</b>	No
<b>6</b>	Did the organization maintain any donor advised funds or any similar funds or accounts for which donors have the right to provide advice on the distribution or investment of amounts in such funds or accounts? <i>If "Yes," complete Schedule D, Part I</i> . . . . .	<b>6</b>	No
<b>7</b>	Did the organization receive or hold a conservation easement, including easements to preserve open space, the environment, historic land areas, or historic structures? <i>If "Yes," complete Schedule D, Part II</i> . . . . .	<b>7</b>	No
<b>8</b>	Did the organization maintain collections of works of art, historical treasures, or other similar assets? <i>If "Yes," complete Schedule D, Part III</i> . . . . .	<b>8</b>	No
<b>9</b>	Did the organization report an amount in Part X, line 21 for escrow or custodial account liability; serve as a custodian for amounts not listed in Part X; or provide credit counseling, debt management, credit repair, or debt negotiation services? <i>If "Yes," complete Schedule D, Part IV</i> . . . . .	<b>9</b>	No
<b>10</b>	Did the organization, directly or through a related organization, hold assets in temporarily restricted endowments, permanent endowments, or quasi endowments? <i>If "Yes," complete Schedule D, Part V</i> . . . . .	<b>10</b>	No
<b>11</b>	If the organization's answer to any of the following questions is "Yes," then complete Schedule D, Parts VI, VII, VIII, IX, or X, as applicable.		
<b>a</b>	Did the organization report an amount for land, buildings, and equipment in Part X, line 10? <i>If "Yes," complete Schedule D, Part VI</i> . . . . .	<b>11a</b>	No
<b>b</b>	Did the organization report an amount for investments—other securities in Part X, line 12 that is 5% or more of its total assets reported in Part X, line 16? <i>If "Yes," complete Schedule D, Part VII</i> . . . . .	<b>11b</b>	No
<b>c</b>	Did the organization report an amount for investments—program related in Part X, line 13 that is 5% or more of its total assets reported in Part X, line 16? <i>If "Yes," complete Schedule D, Part VIII</i> . . . . .	<b>11c</b>	No
<b>d</b>	Did the organization report an amount for other assets in Part X, line 15 that is 5% or more of its total assets reported in Part X, line 16? <i>If "Yes," complete Schedule D, Part IX</i> . . . . .	<b>11d</b>	No
<b>e</b>	Did the organization report an amount for other liabilities in Part X, line 25? <i>If "Yes," complete Schedule D, Part X</i> . . . . .	<b>11e</b>	No
<b>f</b>	Did the organization's separate or consolidated financial statements for the tax year include a footnote that addresses the organization's liability for uncertain tax positions under FIN 48 (ASC 740)? <i>If "Yes," complete Schedule D, Part X</i> . . . . .	<b>11f</b>	No
<b>12a</b>	Did the organization obtain separate, independent audited financial statements for the tax year? <i>If "Yes," complete Schedule D, Parts XI and XII</i> . . . . .	<b>12a</b>	No
<b>b</b>	Was the organization included in consolidated, independent audited financial statements for the tax year? <i>If "Yes," and if the organization answered "No" to line 12a, then completing Schedule D, Parts XI and XII is optional</i> . . . . .	<b>12b</b>	No
<b>13</b>	Is the organization a school described in section 170(b)(1)(A)(ii)? <i>If "Yes," complete Schedule E</i> . . . . .	<b>13</b>	No
<b>14a</b>	Did the organization maintain an office, employees, or agents outside of the United States? . . . . .	<b>14a</b>	No
<b>b</b>	Did the organization have aggregate revenues or expenses of more than \$10,000 from grantmaking, fundraising, business, investment, and program service activities outside the United States, or aggregate foreign investments valued at \$100,000 or more? <i>If "Yes," complete Schedule F, Parts I and IV</i> . . . . .	<b>14b</b>	No
<b>15</b>	Did the organization report on Part IX, column (A), line 3, more than \$5,000 of grants or other assistance to or for any foreign organization? <i>If "Yes," complete Schedule F, Parts II and IV</i> . . . . .	<b>15</b>	No
<b>16</b>	Did the organization report on Part IX, column (A), line 3, more than \$5,000 of aggregate grants or other assistance to or for foreign individuals? <i>If "Yes," complete Schedule F, Parts III and IV</i> . . . . .	<b>16</b>	No
<b>17</b>	Did the organization report a total of more than \$15,000 of expenses for professional fundraising services on Part IX, column (A), lines 6 and 11e? <i>If "Yes," complete Schedule G, Part I. See instructions.</i> . . . . .	<b>17</b>	No
<b>18</b>	Did the organization report more than \$15,000 total of fundraising event gross income and contributions on Part VIII, lines 1c and 8a? <i>If "Yes," complete Schedule G, Part II</i> . . . . .	<b>18</b>	No
<b>19</b>	Did the organization report more than \$15,000 of gross income from gaming activities on Part VIII, line 9a? <i>If "Yes," complete Schedule G, Part III</i> . . . . .	<b>19</b>	No
<b>20a</b>	Did the organization operate one or more hospital facilities? <i>If "Yes," complete Schedule H</i> . . . . .	<b>20a</b>	No
<b>b</b>	If "Yes" to line 20a, did the organization attach a copy of its audited financial statements to this return? . . . . .	<b>20b</b>	
<b>21</b>	Did the organization report more than \$5,000 of grants or other assistance to any domestic organization or domestic government on Part IX, column (A), line 1? <i>If "Yes," complete Schedule I, Parts I and II</i> . . . . .	<b>21</b>	No

## Part IV Checklist of Required Schedules (continued)

	Yes	No
<b>22</b> Did the organization report more than \$5,000 of grants or other assistance to or for domestic individuals on Part IX, column (A), line 2? <i>If "Yes," complete Schedule I, Parts I and III . . . . .</i>	<b>22</b>	No
<b>23</b> Did the organization answer "Yes" to Part VII, Section A, line 3, 4, or 5, about compensation of the organization's current and former officers, directors, trustees, key employees, and highest compensated employees? <i>If "Yes," complete Schedule J . . . . .</i>	<b>23</b>	No
<b>24a</b> Did the organization have a tax-exempt bond issue with an outstanding principal amount of more than \$100,000 as of the last day of the year, that was issued after December 31, 2002? <i>If "Yes," answer lines 24b through 24d and complete Schedule K. If "No," go to line 25a . . . . .</i>	<b>24a</b>	No
<b>b</b> Did the organization invest any proceeds of tax-exempt bonds beyond a temporary period exception? . . . . .	<b>24b</b>	
<b>c</b> Did the organization maintain an escrow account other than a refunding escrow at any time during the year to defease any tax-exempt bonds? . . . . .	<b>24c</b>	
<b>d</b> Did the organization act as an "on behalf of" issuer for bonds outstanding at any time during the year? . . . . .	<b>24d</b>	
<b>25a Section 501(c)(3), 501(c)(4), and 501(c)(29) organizations.</b> Did the organization engage in an excess benefit transaction with a disqualified person during the year? <i>If "Yes," complete Schedule L, Part I . . . . .</i>	<b>25a</b>	No
<b>b</b> Is the organization aware that it engaged in an excess benefit transaction with a disqualified person in a prior year, and that the transaction has not been reported on any of the organization's prior Forms 990 or 990-EZ? <i>If "Yes," complete Schedule L, Part I . . . . .</i>	<b>25b</b>	No
<b>26</b> Did the organization report any amount on Part X, line 5 or 22 for receivables from or payables to any current or former officer, director, trustee, key employee, creator or founder, substantial contributor, or 35% controlled entity or family member of any of these persons? <i>If "Yes," complete Schedule L, Part II . . . . .</i>	<b>26</b>	No
<b>27</b> Did the organization provide a grant or other assistance to any current or former officer, director, trustee, key employee, creator or founder, substantial contributor, or employee thereof, a grant selection committee member, or to a 35% controlled entity (including an employee thereof) or family member of any of these persons? <i>If "Yes," complete Schedule L, Part III . . . . .</i>	<b>27</b>	No
<b>28</b> Was the organization a party to a business transaction with one of the following parties (see the Schedule L, Part IV instructions for applicable filing thresholds, conditions, and exceptions):		
<b>a</b> A current or former officer, director, trustee, key employee, creator or founder, or substantial contributor? <i>If "Yes," complete Schedule L, Part IV . . . . .</i>	<b>28a</b>	No
<b>b</b> A family member of any individual described in line 28a? <i>If "Yes," complete Schedule L, Part IV . . . . .</i>	<b>28b</b>	No
<b>c</b> A 35% controlled entity of one or more individuals and/or organizations described in line 28a or 28b? <i>If "Yes," complete Schedule L, Part IV . . . . .</i>	<b>28c</b>	No
<b>29</b> Did the organization receive more than \$25,000 in non-cash contributions? <i>If "Yes," complete Schedule M . . . . .</i>	<b>29</b>	No
<b>30</b> Did the organization receive contributions of art, historical treasures, or other similar assets, or qualified conservation contributions? <i>If "Yes," complete Schedule M . . . . .</i>	<b>30</b>	No
<b>31</b> Did the organization liquidate, terminate, or dissolve and cease operations? <i>If "Yes," complete Schedule N, Part I . . . . .</i>	<b>31</b>	No
<b>32</b> Did the organization sell, exchange, dispose of, or transfer more than 25% of its net assets? <i>If "Yes," complete Schedule N, Part II . . . . .</i>	<b>32</b>	No
<b>33</b> Did the organization own 100% of an entity disregarded as separate from the organization under Regulations sections 301.7701-2 and 301.7701-3? <i>If "Yes," complete Schedule R, Part I . . . . .</i>	<b>33</b>	No
<b>34</b> Was the organization related to any tax-exempt or taxable entity? <i>If "Yes," complete Schedule R, Part II, III, or IV, and Part V, line 1 . . . . .</i>	<b>34</b>	No
<b>35a</b> Did the organization have a controlled entity within the meaning of section 512(b)(13)?	<b>35a</b>	No
<b>b</b> If "Yes" to line 35a, did the organization receive any payment from or engage in any transaction with a controlled entity within the meaning of section 512(b)(13)? <i>If "Yes," complete Schedule R, Part V, line 2 . . . . .</i>	<b>35b</b>	
<b>36 Section 501(c)(3) organizations.</b> Did the organization make any transfers to an exempt non-charitable related organization? <i>If "Yes," complete Schedule R, Part V, line 2 . . . . .</i>	<b>36</b>	
<b>37</b> Did the organization conduct more than 5% of its activities through an entity that is not a related organization and that is treated as a partnership for federal income tax purposes? <i>If "Yes," complete Schedule R, Part VI . . . . .</i>	<b>37</b>	No
<b>38</b> Did the organization complete Schedule O and provide explanations on Schedule O for Part VI, lines 11b and 19? <b>Note.</b> All Form 990 filers are required to complete Schedule O. . . . .	<b>38</b>	Yes

## Part V Statements Regarding Other IRS Filings and Tax Compliance

Check if Schedule O contains a response or note to any line in this Part V ☐

	Yes	No
<b>1a</b> Enter the number reported in box 3 of Form 1096. Enter -0- if not applicable . . . . .	<b>1a</b>	0
<b>b</b> Enter the number of Forms W-2G included on line 1a. Enter -0- if not applicable . . . . .	<b>1b</b>	0
<b>c</b> Did the organization comply with backup withholding rules for reportable payments to vendors and reportable gaming (gambling) winnings to prize winners? . . . . .	<b>1c</b>	Yes



Part V **Statements Regarding Other IRS Filings and Tax Compliance** (continued)

<b>2a</b> Enter the number of employees reported on Form W-3, Transmittal of Wage and Tax Statements, filed for the calendar year ending with or within the year covered by this return . . . . .	<b>2a</b> 0			
<b>b</b> If at least one is reported on line 2a, did the organization file all required federal employment tax returns?			<b>2b</b>	
<b>3a</b> Did the organization have unrelated business gross income of \$1,000 or more during the year? . . . . .			<b>3a</b>	No
<b>b</b> If "Yes," has it filed a Form 990-T for this year? If "No" to line 3b, provide an explanation in Schedule O . . . . .			<b>3b</b>	
<b>4a</b> At any time during the calendar year, did the organization have an interest in, or a signature or other authority over, a financial account in a foreign country (such as a bank account, securities account, or other financial account)? . . . . .			<b>4a</b>	No
<b>b</b> If "Yes," enter the name of the foreign country: _____ See instructions for filing requirements for FinCEN Form 114, Report of Foreign Bank and Financial Accounts (FBAR).				
<b>5a</b> Was the organization a party to a prohibited tax shelter transaction at any time during the tax year? . . . . .			<b>5a</b>	No
<b>b</b> Did any taxable party notify the organization that it was or is a party to a prohibited tax shelter transaction?			<b>5b</b>	No
<b>c</b> If "Yes," to line 5a or 5b, did the organization file Form 8886-T? . . . . .			<b>5c</b>	
<b>6a</b> Does the organization have annual gross receipts that are normally greater than \$100,000, and did the organization solicit any contributions that were not tax deductible as charitable contributions? . . . . .			<b>6a</b>	Yes
<b>b</b> If "Yes," did the organization include with every solicitation an express statement that such contributions or gifts were not tax deductible? . . . . .			<b>6b</b>	Yes
<b>7 Organizations that may receive deductible contributions under section 170(c).</b>				
<b>a</b> Did the organization receive a payment in excess of \$75 made partly as a contribution and partly for goods and services provided to the payor? . . . . .			<b>7a</b>	
<b>b</b> If "Yes," did the organization notify the donor of the value of the goods or services provided? . . . . .			<b>7b</b>	
<b>c</b> Did the organization sell, exchange, or otherwise dispose of tangible personal property for which it was required to file Form 8282? . . . . .			<b>7c</b>	
<b>d</b> If "Yes," indicate the number of Forms 8282 filed during the year . . . . .	<b>7d</b>			
<b>e</b> Did the organization receive any funds, directly or indirectly, to pay premiums on a personal benefit contract?			<b>7e</b>	
<b>f</b> Did the organization, during the year, pay premiums, directly or indirectly, on a personal benefit contract? . . . . .			<b>7f</b>	
<b>g</b> If the organization received a contribution of qualified intellectual property, did the organization file Form 8899 as required? . . . . .			<b>7g</b>	
<b>h</b> If the organization received a contribution of cars, boats, airplanes, or other vehicles, did the organization file a Form 1098-C? . . . . .			<b>7h</b>	
<b>8 Sponsoring organizations maintaining donor advised funds.</b> Did a donor advised fund maintained by the sponsoring organization have excess business holdings at any time during the year? . . . . .			<b>8</b>	
<b>9 Sponsoring organizations maintaining donor advised funds.</b>				
<b>a</b> Did the sponsoring organization make any taxable distributions under section 4966? . . . . .			<b>9a</b>	
<b>b</b> Did the sponsoring organization make a distribution to a donor, donor advisor, or related person? . . . . .			<b>9b</b>	
<b>10 Section 501(c)(7) organizations.</b> Enter:				
<b>a</b> Initiation fees and capital contributions included on Part VIII, line 12 . . . . .	<b>10a</b>			
<b>b</b> Gross receipts, included on Form 990, Part VIII, line 12, for public use of club facilities	<b>10b</b>			
<b>11 Section 501(c)(12) organizations.</b> Enter:				
<b>a</b> Gross income from members or shareholders . . . . .	<b>11a</b>			
<b>b</b> Gross income from other sources. (Do not net amounts due or paid to other sources against amounts due or received from them.) . . . . .	<b>11b</b>			
<b>12a Section 4947(a)(1) non-exempt charitable trusts.</b> Is the organization filing Form 990 in lieu of Form 1041?			<b>12a</b>	
<b>b</b> If "Yes," enter the amount of tax-exempt interest received or accrued during the year.	<b>12b</b>			
<b>13 Section 501(c)(29) qualified nonprofit health insurance issuers.</b>				
<b>a</b> Is the organization licensed to issue qualified health plans in more than one state? . . . . . <b>Note.</b> See the instructions for additional information the organization must report on Schedule O.			<b>13a</b>	
<b>b</b> Enter the amount of reserves the organization is required to maintain by the states in which the organization is licensed to issue qualified health plans . . . . .	<b>13b</b>			
<b>c</b> Enter the amount of reserves on hand . . . . .	<b>13c</b>			
<b>14a</b> Did the organization receive any payments for indoor tanning services during the tax year? . . . . .			<b>14a</b>	No
<b>b</b> If "Yes," has it filed a Form 720 to report these payments? If "No," provide an explanation in Schedule O . . . . .			<b>14b</b>	
<b>15</b> Is the organization subject to the section 4960 tax on payment(s) of more than \$1,000,000 in remuneration or excess parachute payment(s) during the year?			<b>15</b>	No

personnel payment(s) during the year . . . . .				
If "Yes," see the instructions and file Form 4720, Schedule N.				
16	Is the organization an educational institution subject to the section 4968 excise tax on net investment income? . . . . . If "Yes," complete Form 4720, Schedule O.	16		No
17	<b>Section 501(c)(21) organizations.</b> Did the trust, or any disqualified or other person engage in any activities that would result in the imposition of an excise tax under section 4951, 4952, or 4953? . . . . . If "Yes," complete Form 6069.	17		

Form 990 (2023)

Part VI **Governance, Management, and Disclosure.** For each "Yes" response to lines 2 through 7b below, and for a "No" response to lines 8a, 8b, or 10b below, describe the circumstances, processes, or changes in Schedule O. See instructions.

Check if Schedule O contains a response or note to any line in this Part VI ☒

Section A. Governing Body and Management		Yes	No
1a	Enter the number of voting members of the governing body at the end of the tax year . . . . . If there are material differences in voting rights among members of the governing body, or if the governing body delegated broad authority to an executive committee or similar committee, explain in Schedule O.	2	
1b	Enter the number of voting members included in line 1a, above, who are independent . . . . .	2	
2	Did any officer, director, trustee, or key employee have a family relationship or a business relationship with any other officer, director, trustee, or key employee? . . . . .	2	No
3	Did the organization delegate control over management duties customarily performed by or under the direct supervision of officers, directors or trustees, or key employees to a management company or other person? . . . . .	3	No
4	Did the organization make any significant changes to its governing documents since the prior Form 990 was filed? . . . . .	4	No
5	Did the organization become aware during the year of a significant diversion of the organization's assets? . . . . .	5	No
6	Did the organization have members or stockholders? . . . . .	6	No
7a	Did the organization have members, stockholders, or other persons who had the power to elect or appoint one or more members of the governing body? . . . . .	7a	No
7b	Are any governance decisions of the organization reserved to (or subject to approval by) members, stockholders, or persons other than the governing body? . . . . .	7b	No
8	Did the organization contemporaneously document the meetings held or written actions undertaken during the year by the following:		
8a	a The governing body? . . . . .	8a	Yes
8b	b Each committee with authority to act on behalf of the governing body? . . . . .	8b	Yes
9	Is there any officer, director, trustee, or key employee listed in Part VII, Section A, who cannot be reached at the organization's mailing address? If "Yes," provide the names and addresses in Schedule O . . . . .	9	No

Section B. Policies (This Section B requests information about policies not required by the Internal Revenue Code.)		Yes	No
10a	Did the organization have local chapters, branches, or affiliates? . . . . .	10a	No
10b	b If "Yes," did the organization have written policies and procedures governing the activities of such chapters, affiliates, and branches to ensure their operations are consistent with the organization's exempt purposes? . . . . .	10b	
11a	Has the organization provided a complete copy of this Form 990 to all members of its governing body before filing the form? . . . . .	11a	Yes
11b	b Describe on Schedule O the process, if any, used by the organization to review this Form 990. . . . .		
12a	Did the organization have a written conflict of interest policy? If "No," go to line 13 . . . . .	12a	Yes
12b	b Were officers, directors, or trustees, and key employees required to disclose annually interests that could give rise to conflicts? . . . . .	12b	No
12c	c Did the organization regularly and consistently monitor and enforce compliance with the policy? If "Yes," describe on Schedule O how this was done . . . . .	12c	No
13	Did the organization have a written whistleblower policy? . . . . .	13	Yes
14	Did the organization have a written document retention and destruction policy? . . . . .	14	Yes
15	Did the process for determining compensation of the following persons include a review and approval by independent persons, comparability data, and contemporaneous substantiation of the deliberation and decision?		
15a	a The organization's CEO, Executive Director, or top management official . . . . .	15a	No
15b	b Other officers or key employees of the organization . . . . . If "Yes" to line 15a or 15b, describe the process on Schedule O. See instructions.	15b	No
16a	Did the organization invest in, contribute assets to, or participate in a joint venture or similar arrangement with a taxable entity during the year? . . . . .	16a	No
16b	b If "Yes," did the organization follow a written policy or procedure requiring the organization to evaluate its participation in joint venture arrangements under applicable federal tax law, and take steps to safeguard the organization's exempt status with respect to such arrangements? . . . . .	16b	

Section C. Disclosure



MO

☐ Own website ☐ Another's website ☒ Upon request ☐ Other (explain in Schedule O)

**20** State the name, address, and telephone number of the person who possesses the organization's books and records:  
RIGHTSIDE COMPLIANCE PO BOX 341027 AUSTIN, TX 78734 (703) 587-1469

Page 7

Page 7

Check if Schedule O contains a response or note to any line in this Part VII ☐

☒ Check this box if neither the organization nor any related organization compensated any current officer, director, or trustee.

[illegible]

[illegible]


(A)	(B)	(C)
Name and business address	Description of services	Compensation

2	Total number of independent contractors (including but not limited to those listed above) who received more than \$100,000 of compensation from the organization	0

Part VIII

Statement of Revenue

Check if Schedule O contains a response or note to any line in this Part VIII

	(A) Total revenue	(B) Related or exempt function revenue	(C) Unrelated business revenue	(D) Revenue excluded from tax under sections 512 - 514
 Federated campaigns	1a			
Contributions, Gifts, Grants, and Membership dues	1b			
OtherAmt Similar Amounts	1c			
d Related organizations	1d			
e Government grants (contributions)	1e			
f All other contributions, gifts, grants, and similar amounts not included above	1f			
g Noncash contributions included in lines 1a - 1f:\$	1g			
h Total. Add lines 1a-1f				

2a Program Service Revenue	Business Code				
f All other program service revenue.					
9 Total. Add lines 2a-2f.					

3	Investment income (including dividends, interest, and other similar amounts)					
4	Income from investment of tax-exempt bond proceeds					
5	Royalties					
6a	Gross rents	(i) Real	(ii) Personal			
	b Less: rental expenses	6b				
	c Rental income or (loss)	6c				
d	Net rental income or (loss)					
7a	Gross amount from sales of	(i) Securities	(ii) Other			

Other Revenue	from sales of assets other than inventory						
	b Less: cost or other basis and sales expenses	7b					
	c Gain or (loss)	7c					
	d Net gain or (loss)						
	a Gross income from fundraising events (not including \$ of contributions reported on line 1c). See Part IV, line 18	8a					
	b Less: direct expenses	8b					
	c Net income or (loss) from fundraising events						
	9a Gross income from gaming activities. See Part IV, line 19	9a					
	b Less: direct expenses	9b					
	c Net income or (loss) from gaming activities						
10a Gross sales of inventory, less returns and allowances	10a						
b Less: cost of goods sold	10b						
c Net income or (loss) from sales of inventory							
11a	Business Code						
b							
Other Revenue Misc Amt							
d All other revenue							
e Total. Add lines 11a-11d							
12 Total revenue. See instructions		0	0	0	0	0	

Form 990 (2023)

Part IX Statement of Functional Expenses				
Section 501(c)(3) and 501(c)(4) organizations must complete all columns. All other organizations must complete column (A).				
Check if Schedule O contains a response or note to any line in this Part IX <input checked="" type="checkbox"/>				
Do not include amounts reported on lines 6b, 7b, 8b, 9b, and 10b of Part VIII.	(A) Total expenses	(B) Program service expenses	(C) Management and general expenses	(D) Fundraising expenses
1 Grants and other assistance to domestic organizations and domestic governments. See Part IV, line 21				
2 Grants and other assistance to domestic individuals. See Part IV, line 22				
3 Grants and other assistance to foreign organizations, foreign governments, and foreign individuals. See Part IV, lines 15 and 16.				
4 Benefits paid to or for members				
5 Compensation of current officers, directors, trustees, and key employees				
6 Compensation not included above, to disqualified persons (as defined under section 4958(f)(1)) and persons described in section 4958(c)(3)(B)				
7 Other salaries and wages				
8 Pension plan accruals and contributions (include section 401(k) and 403(b) employer contributions)				
9 Other employee benefits				

10	Payroll taxes . . . . .				
11	Fees for services (non-employees):				
a	Management . . . . .				
b	Legal . . . . .				
c	Accounting . . . . .				
d	Lobbying . . . . .				
e	Professional fundraising services. See Part IV, line 17				
f	Investment management fees . . . . .				
g	Other (If line 11g amount exceeds 10% of line 25, column (A) amount, list line 11g expenses on Schedule O)	25,990		25,990	
12	Advertising and promotion . . . . .				
13	Office expenses . . . . .				
14	Information technology . . . . .				
15	Royalties . . . . .				
16	Occupancy . . . . .				
17	Travel . . . . .				
18	Payments of travel or entertainment expenses for any federal, state, or local public officials . . . . .				
19	Conferences, conventions, and meetings . . . . .				
20	Interest . . . . .				
21	Payments to affiliates . . . . .				
22	Depreciation, depletion, and amortization . . . . .				
23	Insurance . . . . .				
24	Other expenses. Itemize expenses not covered above (List miscellaneous expenses in line 24e. If line 24e amount exceeds 10% of line 25, column (A) amount, list line 24e expenses on Schedule O.)				
a	SUBSCRIPTIONS	651		651	
b					
c					
d					
e	All other expenses				
25	Total functional expenses. Add lines 1 through 24e	26,641	0	26,641	0
26	Joint costs. Complete this line only if the organization reported in column (B) joint costs from a combined educational campaign and fundraising solicitation. Check here <input type="checkbox"/> if following SOP 98-2 (ASC 958-720).				

Form 990 (2023)

Part X Balance Sheet

Check if Schedule O contains a response or note to any line in this Part IX ☐

		(A) Beginning of year		(B) End of year
Assets	1 Cash-non-interest-bearing . . . . .	28,749	1	2,108
	2 Savings and temporary cash investments . . . . .		2	
	3 Pledges and grants receivable, net . . . . .		3	
	4 Accounts receivable, net . . . . .		4	
	5 Loans and other receivables from any current or former officer, director, trustee, key employee, creator or founder, substantial contributor, or 35% controlled entity or family member of any of these persons		5	
	6 Loans and other receivables from other disqualified persons (as defined under section 4958(f)(1)), and persons described in section 4958(c)(3)(B) . . . . .		6	
	7 Notes and loans receivable, net . . . . .		7	
	8 Inventories for sale or use . . . . .		8	
	9 Prepaid expenses and deferred charges . . . . .		9	
	10a Land, buildings, and equipment: cost or other basis. Complete Part VI of Schedule D	10a		
b Less: accumulated depreciation	10b			10c



	11	Investments—publicly traded securities . . . . .		11	
	12	Investments—other securities. See Part IV, line 11 . . . . .		12	
	13	Investments—program-related. See Part IV, line 11 . . . . .		13	
	14	Intangible assets . . . . .		14	
	15	Other assets. See Part IV, line 11 . . . . .		15	
	16	<b>Total assets.</b> Add lines 1 through 15 (must equal line 33) . . . . .	28,749	16	2,108
Liabilities	17	Accounts payable and accrued expenses . . . . .		17	
	18	Grants payable . . . . .		18	
	19	Deferred revenue . . . . .		19	
	20	Tax-exempt bond liabilities . . . . .		20	
	21	Escrow or custodial account liability. Complete Part IV of Schedule D		21	
	22	Loans and other payables to any current or former officer, director, trustee, key employee, creator or founder, substantial contributor, or 35% controlled entity or family member of any of these persons . . . . .		22	
	23	Secured mortgages and notes payable to unrelated third parties . . . . .		23	
	24	Unsecured notes and loans payable to unrelated third parties . . . . .		24	
	25	Other liabilities (including federal income tax, payables to related third parties, and other liabilities not included on lines 17 - 24). Complete Part X of Schedule D		25	
	26	<b>Total liabilities.</b> Add lines 17 through 25 . . . . .	0	26	0
Net Assets or Fund Balances	<b>Organizations that follow FASB ASC 958, check here</b> <input type="checkbox"/> <b>and complete lines 27, 28, 32, and 33.</b>				
	27	Net assets without donor restrictions . . . . .		27	
	28	Net assets with donor restrictions . . . . .		28	
	<b>Organizations that do not follow FASB ASC 958, check here</b> <input checked="" type="checkbox"/> <b>and complete lines 29 through 33.</b>				
	29	Capital stock or trust principal, or current funds . . . . .	0	29	0
	30	Paid-in or capital surplus, or land, building or equipment fund . . . . .	0	30	0
	31	Retained earnings, endowment, accumulated income, or other funds	28,749	31	2,108
	32	<b>Total net assets or fund balances</b> . . . . .	28,749	32	2,108
	33	<b>Total liabilities and net assets/fund balances</b> . . . . .	28,749	33	2,108

Form 990 (2023)

Form 990 (2023)

Part XI **Reconciliation of Net Assets**

Check if Schedule O contains a response or note to any line in this Part XI ☐

1	Total revenue (must equal Part VIII, column (A), line 12) . . . . .	1	0
2	Total expenses (must equal Part IX, column (A), line 25) . . . . .	2	26,641
3	Revenue less expenses. Subtract line 2 from line 1 . . . . .	3	-26,641
4	Net assets or fund balances at beginning of year (must equal Part X, line 32, column (A)) . . . . .	4	28,749
5	Net unrealized gains (losses) on investments . . . . .	5	
6	Donated services and use of facilities . . . . .	6	
7	Investment expenses . . . . .	7	
8	Prior period adjustments . . . . .	8	
9	Other changes in net assets or fund balances (explain in Schedule O) . . . . .	9	0
10	<b>Net assets or fund balances at end of year.</b> Combine lines 3 through 9 (must equal Part X, line 32, column (B))	10	2,108

Part XII **Financial Statements and Reporting**

Check if Schedule O contains a response or note to any line in this Part XII ☐

1 Accounting method used to prepare the Form 990: ☒ Cash ☐ Accrual ☐ Other \_\_\_\_\_  
If the organization changed its method of accounting from a prior year or checked "Other," explain on Schedule O.

2a Were the organization's financial statements compiled or reviewed by an independent accountant?  
If "Yes," check a box below to indicate whether the financial statements for the year were compiled or reviewed on a separate basis, consolidated basis, or both:

☐ Separate basis ☐ Consolidated basis ☐ Both consolidated and separate basis

	Yes	No
2a		No

<b>b</b> Were the organization's financial statements audited by an independent accountant? If 'Yes,' check a box below to indicate whether the financial statements for the year were audited on a separate basis, consolidated basis, or both:  <input type="checkbox"/> Separate basis <input type="checkbox"/> Consolidated basis <input type="checkbox"/> Both consolidated and separate basis	<b>2b</b>		No
<b>c</b> If "Yes," to line 2a or 2b, does the organization have a committee that assumes responsibility for oversight of the audit, review, or compilation of its financial statements and selection of an independent accountant? If the organization changed either its oversight process or selection process during the tax year, explain in Schedule O.	<b>2c</b>		
<b>3a</b> As a result of a federal award, was the organization required to undergo an audit or audits as set forth in the Uniform Guidance, 2 C.F.R. Part 200, Subpart F?	<b>3a</b>		No
<b>b</b> If "Yes," did the organization undergo the required audit or audits? If the organization did not undergo the required audit or audits, explain why in Schedule O and describe any steps taken to undergo such audits.	<b>3b</b>		

Form 990 (2023)

Form 990 (2023)

Additional Data

Return to Form

Software ID:  
Software Version:

Form 990, Special Condition Description:

Special Condition Description

efile Public Visual Render

ObjectID: 202411579349300626 - Submission: 2024-06-05

TIN: 88-2273990

SCHEDULE O  
(Form 990)

Department of the Treasury  
Internal Revenue Service

Supplemental Information to Form 990 or 990-EZ

Complete to provide information for responses to specific questions on  
Form 990 or 990-EZ or to provide any additional information.  
Attach to Form 990 or 990-EZ.  
Go to [www.irs.gov/Form990](https://www.irs.gov/Form990) for the latest information.

OMB No. 1545-0047

2023

Open to Public  
Inspection

Name of the organization  
CONSERVATIVES NETWORK

Employer identification number  
88-2273990

Return Reference	Explanation
FORM 990, PART VI, SECTION B, LINE 11B	THE DRAFT 990 IS PRESENTED TO BOARD MEMBERS FOR THEIR REVIEW.
FORM 990, PART VI, SECTION C, LINE 19	THE ORGANIZATION'S GOVERNING DOCUMENTS, CONFLICT OF INTEREST POLICY, AND FINANCIAL STATEMENTS ARE NOT MADE AVAILABLE TO THE PUBLIC.
FORM 990, PART IX, LINE 11G	CONSULTING: PROGRAM SERVICE EXPENSES 0. MANAGEMENT AND GENERAL EXPENSES 25,990. FUNDRAISING EXPENSES 0. TOTAL EXPENSES 25,990.

Additional Data

Return to Form

Software ID:  
Software Version:

# Exhibit 3



Form **990EZ**

Department of the Treasury  
Internal Revenue Service

Short Form

Return of Organization Exempt From Income Tax

Under section 501(c), 527, or 4947(a)(1) of the Internal Revenue Code (except private foundations)

Do not enter social security numbers on this form as it may be made public.

Go to [www.irs.gov/Form990EZ](http://www.irs.gov/Form990EZ) for instructions and the latest information.

OMB No. 1545-0047

**2024**

Open to  
Public  
Inspection

**A** For the 2024 calendar year, or tax year beginning 01-01-2024, and ending 12-31-2024

**B** Check if applicable:  
☐ Address change  
☐ Name change  
☐ Initial return  
☐ Final return/terminated  
☐ Amended return  
☐ Application pending

**C** Name of organization  
CONSERVATIVES NETWORK  

Number and street (or P. O. box, if mail is not delivered to street address) Room/suite  
14425 FALCON HEAD BLVD UNIT E100  
City or town, state or province, country, and ZIP or foreign postal code  
AUSTIN, TX 78738

**D** Employer identification number  
88-2273990  
**E** Telephone number  
(512) 354-1787  
**F** Group Exemption Number

**G** Accounting Method: ☒ Cash ☐ Accrual Other (specify) \_\_\_\_\_

**H** Check ☒ required to attach Schedule B (Form 990, 990-EZ, or 990-PF).

**I** Website: N/A

**J** Tax-exempt status (check only one) - ☐ 501(c)(3) ☒ 501(c)( 4) (insert no.) ☐ 4947(a)(1) or ☐ 527

**K** Form of organization: ☒ Corporation ☐ Trust ☐ Association ☐ Other \_\_\_\_\_

**L** Add lines 5b, 6c, and 7b to line 9 to determine gross receipts. If gross receipts are \$200,000 or more, or if total assets (Part II, column (B) below) are \$500,000 or more, file Form 990 instead of Form 990-EZ . . . . . \$ 0

Part I Revenue, Expenses, and Changes in Net Assets or Fund Balances (see the instructions for Part I)			
Check if the organization used Schedule O to respond to any question in this Part I . . . . . <input checked="" type="checkbox"/>			
Revenue	1	Contributions, gifts, grants, and similar amounts received . . . . .	1
	2	Program service revenue including government fees and contracts . . . . .	2
	3	Membership dues and assessments . . . . .	3
	4	Investment income . . . . .	4
	5a	Gross amount from sale of assets other than inventory . . . . . 5a	5c
	b	Less: cost or other basis and sales expenses . . . . . 5b	
	c	Gain or (loss) from sale of assets other than inventory (Subtract line 5b from line 5a) . . . . .	
	6	Gaming and fundraising events	6d
	a	Gross income from gaming (attach Schedule G if greater than \$15,000) . . . . . 6a	
	b	Gross income from fundraising events (not including \$ _____ of contributions from fundraising events reported on line 1) (attach Schedule G if the sum of such gross income and contributions exceeds \$15,000) . . . . . 6b	
Expenses	c	Less: direct expenses from gaming and fundraising events . . . . . 6c	
	d	Net income or (loss) from gaming and fundraising events (add lines 6a and 6b and subtract line 6c)	
	7a	Gross sales of inventory, less returns and allowances . . . . . 7a	7c
	b	Less: cost of goods sold . . . . . 7b	
	c	Gross profit or (loss) from sales of inventory (Subtract line 7b from line 7a) . . . . .	
	8	Other revenue (describe in Schedule O) . . . . .	8
	9	Total revenue. Add lines 1, 2, 3, 4, 5c, 6d, 7c, and 8 . . . . . 9	0
	10	Grants and similar amounts paid (list in Schedule O) . . . . .	10
	11	Benefits paid to or for members . . . . .	11
	12	Salaries, other compensation, and employee benefits . . . . .	12
Net Assets	13	Professional fees and other payments to independent contractors . . . . .	13
	14	Occupancy, rent, utilities, and maintenance . . . . .	14
	15	Printing, publications, postage, and shipping . . . . .	15
	16	Other expenses (describe in Schedule O) . . . . .	16
	17	Total expenses. Add lines 10 through 16 . . . . . 17	1,229
	18	Excess or (deficit) for the year (Subtract line 17 from line 9) . . . . .	-1,229
	19	Net assets or fund balances at beginning of year (from line 27, column (A)) (must agree with end-of-year figure reported on prior year's return) . . . . .	2,108
	20	Other changes in net assets or fund balances (explain in Schedule O) . . . . .	0
	21	Net assets or fund balances at end of year. Combine lines 18 through 20 . . . . .	879

For Paperwork Reduction Act Notice, see the separate instructions.

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**Part II Balance Sheets**(see the instructions for Part II)Check if the organization used Schedule O to respond to any question in this Part II . . . . . ☐

	(A) Beginning of year		(B) End of year
<b>22</b> Cash, savings, and investments . . . . .	2,108	<b>22</b>	879
<b>23</b> Land and buildings . . . . .		<b>23</b>	
<b>24</b> Other assets (describe in Schedule O) . . . . .		<b>24</b>	
<b>25</b> Total assets . . . . .	2,108	<b>25</b>	879
<b>26</b> Total liabilities (describe in Schedule O). . . . .	0	<b>26</b>	0
<b>27</b> Net assets or fund balances (line 27 of column (B) must agree with line 21)	2,108	<b>27</b>	879

**Part III Statement of Program Service Accomplishments** (see the instructions for Part III)Check if the organization used Schedule O to respond to any question in this Part III . . . ☒

What is the organization's primary exempt purpose?

THE ORGANIZATION'S MISSION IS TO ADVANCE CONSERVATIVE POLICIES IN THE STATE OF MISSOURI.

Describe the organization's program service accomplishments for each of its three largest program services, as measured by expenses. In a clear and concise manner, describe the services provided, the number of persons benefited, and other relevant information for each program title.

**28** THE ORGANIZATION SPONSORED TELEVISION ADVERTISING TO SUPPORT PRO LAW ENFORCEMENT POLICIES IN MISSOURI.(Grants \$ 0) If this amount includes foreign grants, check here . . . ☐**29**(Grants \$ ) If this amount includes foreign grants, check here . . . ☐**30**(Grants \$ ) If this amount includes foreign grants, check here . . . ☐**31** Other program services (describe in Schedule O) . . . . .(Grants \$ ) If this amount includes foreign grants, check here . . . ☐**32** Total program service expenses (add lines 28a through 31a)**Part IV List of Officers, Directors, Trustees, and Key Employees** (list each one even if not compensated ; see the instructions for Part IV)Check if the organization used Schedule O to respond to any question in this Part IV. . . . . ☐

(a) Name and title	(b) Average hours per week devoted to position	(c) Reportable compensation (Forms W-2/1099-MISC) (if not paid, enter -0-)	(d) Health benefits, contributions to employee benefit plans, and deferred compensation	(e) Estimated amount of other compensation
CHRISTOPHER CRANCER	1.00	0	0	0
PRESIDENT				
MATTHEW BELZ	1.00	0	0	0
SECRETARY				

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**Part V Other Information** (Note the Schedule A and personal benefit contract statement requirements in theinstructions for Part V.) Check if the organization used Schedule O to respond to any question in this Part V . . . . . ☒

	Yes	No
<b>33</b> Did the organization engage in any significant activity not previously reported to the IRS? If "Yes," provide a detailed description of each activity in Schedule O . . . . .		No
<b>34</b> Were any significant changes made to the organizing or governing documents? If "Yes," attach a conformed copy of the amended documents if they reflect a change to the organization's name. Otherwise, explain the change on Schedule O. See instructions. . . . .		No
<b>35a</b> Did the organization have unrelated business gross income of \$1,000 or more during the year from business activities (such as those reported on lines 2, 6a, and 7a, among others)? . . . . .		No
<b>b</b> If "Yes," to line 35a, has the organization filed a Form 990-T for the year? If "No," provide an explanation in Schedule O . . . . .		
<b>c</b> Was the organization a section 501(c)(4), 501(c)(5), or 501(c)(6) organization subject to section 6033(e) notice, reporting, and proxy tax requirements during the year? If "Yes," complete Schedule C, Part III . . . . .		No
<b>36</b> Did the organization undergo a liquidation, dissolution, termination, or significant disposition of net assets during . . . . .		

36 No

37a 0

37b

38a No

38b

39a

39b

40a

40b No

40c 0

40d 0

40e No

41 MO

42a RIGHTSIDE COMPLIANCE Telephone no. (703) 587-1469

Located at PO BOX 341027 AUSTIN, TX ZIP + 4 78734

42b No

42c No

43 43

44a No

44b No

44c No

44d

45a No

45b

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46 No

Part VI Section 501(c)(3) Organizations Only

All section 501(c)(3) organizations must answer questions 47- 49b and 52, and complete the tables for lines 50 and 51. Check if the organization used Schedule O to respond to any question in this Part VI

47



48

Is the organization a school as described in section 170(b)(1)(A)(ii)? If "Yes," complete Schedule E

48

49a

Did the organization make any transfers to an exempt non-charitable related organization?

49a

b

If "Yes," was the related organization a section 527 organization?

49b

50 Complete this table for the organization's five highest compensated employees (other than officers, directors, trustees and key employees) who each received more than \$100,000 of compensation from the organization. If there is none, enter "None."

(a) Name and title of each employee	(b) Average hours per week devoted to position	(c) Reportable compensation (Forms W-2/1099-MISC)	(d) Health benefits, contributions to employee benefit plans, and deferred compensation	(e) Estimated amount of other compensation

f Total number of other employees paid over \$100,000

51 Complete this table for the organization's five highest compensated independent contractors who each received more than \$100,000 of compensation from the organization. If there is none, enter "None."

(a) Name and business address of each independent contractor	(b) Type of service	(c) Compensation

d Total number of other independent contractors each receiving over \$100,000.

52 Did the organization complete Schedule A? **NOTE.** All section 501(c)(3) organizations must attach a completed Schedule A

☐ Yes ☐ No

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.

Sign Here

Signature of officer

2025-02-28

Date

MATTHEW BELZ SECRETARY

Type or print name and title

Paid Preparer Use Only

Print/Type preparer's name

RENAE DUNCAN

Preparer's signature

Date

2025-02-24

Check ☐ if self-employed

PTIN

P01257722

Firm's name

▶ ATCHLEY & ASSOCIATES LLP

Firm's EIN

▶ 74-2920819

Firm's address

▶ 1005 LA POSADA DRIVE

AUSTIN, TX 78752

Phone no. (512) 346-2086

May the IRS discuss this return with the preparer shown above? See instructions

☒ Yes ☐ No

Form 990-EZ (2024)

Special Condition Description

efile Public Visual Render

ObjectId: 202500629349200300 - Submission: 2025-03-03

TIN: 88-2273990

**SCHEDULE O**  
**(Form 990)**  
(Rev. January 2025)  
Department of the Treasury  
Internal Revenue Service

**Supplemental Information to Form 990 or 990-EZ**  
Complete to provide information for responses to specific questions on  
Form 990 or 990-EZ or to provide any additional information.  
Attach to Form 990 or 990-EZ.  
Go to [www.irs.gov/Form990](http://www.irs.gov/Form990) for instructions and the latest information.

OMB No. 1545-0047  
**Open to Public  
Inspection**

Name of the organization  
CONSERVATIVES NETWORK

Employer identification number  
88-2273990

Return Reference	Explanation
FORM 990-EZ, PART I, LINE 16 - OTHER EXPENSES	DESCRIPTION: SUBSCRIPTIONS. AMOUNT: 794.

For Paperwork Reduction Act Notice, see the Instructions for Form 990 or 990-EZ.

Cat. No. 51056K

Schedule O (Form 990) (Rev. 1-2025)

Additional Data

Return to Form

Software ID:  
Software Version:

efile Public Visual Render

ObjectId: 202500629349200300 - Submission: 2025-03-03

TIN: 88-2273990

TY 2024 IRS 990 e-File Render

**Name:** CONSERVATIVES NETWORK  
**EIN:** 88-2273990

**Declaration:** THE ORGANIZATION DID NOT, DURING THE YEAR, RECEIVE ANY FUNDS, DIRECTLY,OR INDIRECTLY, TO PAY PREMIUMS ON A PERSONAL BENEFIT CONTRACT.THE ORGANIZATION, DID NOT, DURING THE YEAR, PAY ANY PREMIUMS, DIRECTLY,OR INDIRECTLY, ON A PERSONAL BENEFIT CONTRACT.