

BEFORE THE FEDERAL ELECTION COMMISSION OF THE UNITED STATES OF AMERICA

Stop China Now, Inc.  
21 Mohawk Trail, PMB 197  
Greenfield, MA 01301

Save Western Culture  
Seth Martin, Treasurer  
21 Mohawk Trail, PMB 197  
Greenfield, MA 01301

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

**COMPLAINT**

1. Complainant brings this complaint before the Federal Election Commission (“FEC” or “Commission”) seeking an immediate investigation and enforcement action against Stop China Now, Inc. (“Stop China Now”) and Save Western Culture for violations of the Federal Election Campaign Act, as amended (“FECA”).
2. This complaint is filed pursuant to 52 U.S.C. § 30109(a)(1) and is based on publicly available information providing reason to believe that Stop China Now, Inc., Save Western Culture, and the person or persons operating these entities made a contribution in the name of another, and knowingly accepted a contribution made by one person in the name of another, in violation of 52 U.S.C. 30122.
3. The Commission should make the necessary reason to believe findings and commence an immediate investigation into Stop China Now, Inc., Save Western Culture, and the person or persons operating these entities.

**STATEMENT OF FACTS**

4. Stop China Now, Inc. is a Delaware tax-exempt organization that was incorporated in Delaware on October 3, 2024.<sup>1</sup>

Entity Details			
<b>THIS IS NOT A STATEMENT OF GOOD STANDING</b>			
<b>File Number:</b>	5390228	<b>Incorporation Date / Formation Date:</b>	10/3/2024 (mm/dd/yyyy)
<b>Entity Name:</b>	STOP CHINA NOW, INC.		
<b>Entity Kind:</b>	Corporation	<b>Entity Type:</b>	Exempt
<b>Residency:</b>	Domestic	<b>State:</b>	DELAWARE
<b>REGISTERED AGENT INFORMATION</b>			
<b>Name:</b>	THE CORPORATION TRUST COMPANY		
<b>Address:</b>	CORPORATION TRUST CENTER 1209 ORANGE ST		
<b>City:</b>	WILMINGTON	<b>County:</b>	New Castle
<b>State:</b>	DE	<b>Postal Code:</b>	19801
<b>Phone:</b>	302-658-7581		

<sup>1</sup> Delaware Department of State, Division of Corporations, Stop China Now, Inc., File Number 5390228 (Filed Oct. 3, 2024), <https://icis.corp.delaware.gov/Ecorp/EntitySearch/NameSearch.aspx>.

5. On October 11, 2024, Save Western Culture registered with the Federal Election Commission as an independent expenditure-only political committee (Super PAC). The committee's treasurer is Seth Martin, and its address is listed as 21 Mohawk Trail, PMB 197, Greenfield, Massachusetts 01301.<sup>2</sup>

<b>FEC FORM 1</b>	<b>STATEMENT OF ORGANIZATION</b>	PAGE 174  Office Use Only
<p>1. NAME OF COMMITTEE (in full) <input type="checkbox"/> (Check if name is changed) Example: If typing, type over the lines. <span style="float: right; border: 1px solid black; padding: 2px;">12FE4M5</span></p> <p><b>Save Western Culture</b></p> <hr/> <p>ADDRESS (number and street) <span style="float: right;">21 Mohawk Trl PMB 197</span></p> <p><input type="checkbox"/> (Check if address is changed)</p> <p style="text-align: center;">Greenfield <span style="margin-left: 150px;">MA</span> <span style="margin-left: 50px;">01301</span></p> <p style="text-align: center;">CITY ▲ <span style="margin-left: 150px;">STATE ▲</span> <span style="margin-left: 50px;">ZIP CODE ▲</span></p> <p>COMMITTEE'S E-MAIL ADDRESS</p> <p><input type="checkbox"/> (Check if address is changed) <span style="float: right;">Libertyordeath2024@protonmail.com</span></p> <p>Optional Second E-Mail Address</p> <hr/> <p>COMMITTEE'S WEB PAGE ADDRESS (URL)</p> <p><input type="checkbox"/> (Check if address is changed)</p> <hr/> <p>2. DATE <span style="margin-left: 20px;">10</span> / <span style="margin-left: 20px;">11</span> / <span style="margin-left: 20px;">2024</span></p> <p>3. FEC IDENTIFICATION NUMBER ▶ <span style="float: right; border: 1px solid black; padding: 2px;">C C00891135</span></p> <p>4. IS THIS STATEMENT <input checked="" type="checkbox"/> NEW (N) OR <input type="checkbox"/> AMENDED (A)</p> <hr/> <p>I certify that I have examined this Statement and to the best of my knowledge and belief it is true, correct and complete.</p> <p>Type or Print Name of Treasurer <span style="float: right;">Martin, Seth, . . .</span></p> <p>Signature of Treasurer <span style="float: right;">Martin, Seth, . . .</span> Date <span style="float: right;">10</span> / <span style="float: right;">11</span> / <span style="float: right;">2024</span></p>		

**Political Action Committee (PAC):**

(e)  This committee is a separate segregated fund. (Identify connected organization on line 6.) Its connected organization is a:

<input type="checkbox"/> Corporation	<input type="checkbox"/> Corporation w/o Capital Stock	<input type="checkbox"/> Labor Organization
<input type="checkbox"/> Membership Organization	<input type="checkbox"/> Trade Association	<input type="checkbox"/> Cooperative

In addition, this committee is a Lobbyist/Registrant PAC.

(f)  This committee supports/opposes more than one Federal candidate, and is NOT a separate segregated fund or party committee. (i.e., nonconnected committee)

In addition, this committee is a Lobbyist/Registrant PAC.

In addition, this committee is a Leadership PAC. (Identify sponsor on line 6.)

(g)  This committee is an independent expenditure-only political committee (Super PAC).

In addition, this committee is a Lobbyist/Registrant PAC.

<sup>2</sup> Save Western Culture, Statement of Organization 2024, Page 1 (Filed Oct. 11, 2024), <https://docquery.fec.gov/pdf/257/202412059720486257/202412059720486257.pdf>.

6. Stop China Now, also located at 21 Mohawk Trail, PMB 197, Greenfield, Massachusetts 01301, appears to have served as a “straw donor” for unknown persons to funnel \$1,600,000 into the Super PAC Save Western Culture. On October 17, 2024, Save Western Culture received the entirety of its funds (\$1,600,000) from a single donor, Stop China Now.<sup>3</sup>

Image# 202412059720486262

**SCHEDULE A (FEC Form 3X)**  
**ITEMIZED RECEIPTS**

Use separate schedule(s) for each category of the Detailed Summary Page

FOR LINE NUMBER: (check only one) PAGE 6 OF 49

11a  11b  11c  12  
 13  14  15  16  17

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)  
**SAVE WESTERN CULTURE**

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name  
**A. Stop China Now Inc**

Mailing Address **21 Mohawk Trl. PMB 197**

City **Greenfield** State **MA** Zip Code **01301**

Date of Receipt  
M M / D D / Y Y Y Y  
**10 / 17 / 2024**  
Transaction ID : **SA11A1.4100**

FEC ID number of contributing federal political committee. **C**

Amount of Each Receipt this Period  
**1600000.00**

Name of Employer (for Individual) Occupation (for Individual)

Receipt For:  
 Primary  General  
 Other (specify) ▼

Memo Item

Aggregate Year-to-Date ▼  
**1600000.00**

7. Save Western Culture then spent an almost identical sum beginning the same day the contribution was received (October 17, 2024) through November 1, 2024. The committee made independent expenditures totaling \$1,398,194.49, and paid two vendors a total of \$201,572.12, for combined total spending of \$1,599,766.61. News reports described Save Western Culture’s spending efforts as “working to sabotage Republicans in tight House and Senate races by propping up Libertarian candidates.” *Politico* reported that, “Save Western Culture popped up in the final days of the election, taking elaborate steps to conceal its funders and strategists.”<sup>4</sup>
8. The available facts demonstrate that Stop China Now was created and used as a straw donor to hide the true contributor’s identity (or contributors’ identities), and that Save Western Culture was aware of this fact. The two organizations were created weeks before the November 2024 election and they share the same address. *Politico* reports that the address listed for both organizations “is the same Massachusetts UPS Store.”<sup>5</sup> The common address indicates common control, which in turn, indicates that the person or persons who established the two organizations had knowledge of the underlying details of the contribution at issue in this matter.

<sup>3</sup> Save Western Culture, FEC 2024 Post-General Report, Page 6 (Filed Dec. 5, 2024), <https://docquery.fec.gov/pdf/257/202412059720486257/202412059720486257.pdf>. This is also the same address listed for “Stop China Now” on its non-deleted website’s privacy policy. See Stop China Now, Privacy Policy (Updated Oct. 25, 2024), <https://web.archive.org/web/20241128201844/https://stopchinanow.org/#privacy>.

<sup>4</sup> Save Western Culture, FEC 2024 Post-General Report, Pages 4, 6, and 7 (Filed Dec. 5, 2024), <https://docquery.fec.gov/pdf/257/202412059720486257/202412059720486257.pdf>; Ryan King, *Mysterious Super PAC with Potential Dem Ties Props Up Third Party to Undercut GOP in Tough Races*, NEW YORK POST (Oct. 29, 2024), <https://nypost.com/2024/10/29/us-news/mysterious-super-pac-props-up-libertarians-undercuts-gop-in-tough-races/>; See also Emily Brooks, *Shadony Groups Seek to Hurt House GOP Incumbent by Boosting Independent Challenger*, THE HILL (Nov. 1, 2024), <https://thehill.com/homenews/house/4964854-independent-candidate-boosted/>; Ally Mutnick and Jessica Piper, *The Controversial Tactic Super PACs Used to Boost Democrats this Year*, POLITICO (Dec. 7, 2024), <https://www.politico.com/news/2024/12/07/2024-election-congress-controversial-tactic-third-party-00193124>.

<sup>5</sup> Ally Mutnick and Jessica Piper, *The Controversial Tactic Super PACs Used to Boost Democrats this Year*, POLITICO (Dec. 7, 2024), <https://www.politico.com/news/2024/12/07/2024-election-congress-controversial-tactic-third-party-00193124>.

9. Stop China Now was incorporated in Delaware as an “exempt” entity, meaning any revenues it receives are donations or contributions from another person as opposed to ordinary business revenues. Thus, sometime after October 3, 2024, one or more persons donated funds totaling at least \$1,600,000 to Stop China Now, and within two weeks, those funds were contributed to Save Western Culture, which immediately began using them to make independent expenditures. Save Western Culture did not receive any other contributions during the period at issue.<sup>6</sup>
10. Accordingly, there is reason to believe that Stop China Now served as a straw donor and made a contribution in the name of another to Save Western Culture, and Save Western Culture knowingly accepted a contribution made by one person in the name of another. Both are violations of 52 U.S.C. § 30122 and 11 C.F.R. § 110.4(b).

### **STATEMENT OF THE LAW**

11. 52 U.S.C. § 30122 provides that “[n]o person shall make a contribution in the name of another person or knowingly permit his name to be used to effect such a contribution and no person shall knowingly accept a contribution made by one person in the name of another.”
12. Commission regulations provide examples of “contributions in the name of another,” including:
  - “Giving money or anything of value, all or part of which was provided to the contributor by another person (the true contributor) without disclosing the source of money or the thing of value to the recipient candidate or committee at the time the contribution is made.”<sup>7</sup>
  - “Making a contribution of money or anything of value and attributing as the source of the money or thing of value another person when in fact the contributor is the source.”<sup>8</sup>
13. “The requirement that a contribution be made in the name of its true source promotes Congress’s objective of ensuring the complete and accurate disclosure by candidates and committees of the political contributions they receive.” “[B]oth the Act and the Commission’s implementing regulations provide that a person who furnishes another with funds for the purpose of contributing to a candidate or committee ‘makes’ the resulting contribution.”<sup>10</sup>
14. On April 1, 2016, Chair Petersen and Commissioners Hunter and Goodman issued a Statement of Reasons explaining their view regarding “the appropriate standard” to apply “in future matters” raising the allegation that an LLC was used to facilitate a contribution in the name of another.<sup>11</sup> The Commissioners explained that in their view, “the proper focus in these matters is whether the funds used to make a contribution were intentionally funneled through a closely held corporation or corporate LLC for the purpose of making a contribution that evades the Act’s reporting requirements, making the individual, not the corporation or corporate LLC, the true source of the funds.”<sup>12</sup>
15. Vice Chair Dickerson and Commissioners Cooksey and Trainor reiterated in 2021 that “the Commission’s central inquiry in examining a potential conduit contribution is ‘whether funds were

---

<sup>6</sup> *Supra* note 3.

<sup>7</sup> 11 C.F.R. § 110.4(b)(2)(i).

<sup>8</sup> 11 C.F.R. § 110.4(b)(2)(ii).

<sup>9</sup> Statement of Reasons of Chair Shana M. Broussard and Commissioner Ellen L. Weintraub in MUR 7754 (Dec. 1, 2021) at 6.

<sup>10</sup> *Id.* at 6-7.

<sup>11</sup> Statement of Reasons of Chairman Matthew S. Petersen and Commissioners Caroline C. Hunter and Lee E. Goodman in MURs 6485, 6487, 6488, 6711, 6930 (Apr. 1, 2016) at 2.

<sup>12</sup> *Id.*

intentionally funneled through a [conduit] for the purpose of making a contribution that evades the Act's reporting requirements.”<sup>13</sup>

16. The timing of the creation of the two organizations, the contribution of funds, and the making of independent expenditures in amounts nearly identical to the contribution received is strongly suggestive of a “contribution in the name of another” scheme. All of the activity at issue in this Complaint occurred within a one-month period. “[T]he Commission has reasoned in past matters that evidence of an entity receiving funds and then making a political contribution shortly thereafter suggests that the contribution was in the name of another.”<sup>14</sup> In other words, a “close temporal proximity between an entity’s receipt of funds and its subsequent contribution may indicate that it is not the true source of the contribution.”<sup>15</sup>
17. The amount contributed by Stop China Now and then spent by Save Western Culture was virtually identical (\$1,600,000 contributed and \$1,599,766.61 spent). “An entity contributing an amount identical to a sum recently received – or being later reimbursed for that amount – may suggest that the funds were conveyed for the purpose of being contributed.”<sup>16</sup>

### **CAUSES OF ACTION**

#### **AGAINST RESPONDENTS STOP CHINA NOW, INC. AND SAVE WESTERN CULTURE**

##### **Stop China Now, Inc. Made A Contribution in the Name of Another Person in Violation of 52 U.S.C. § 30122**

18. The available information supports finding reason to believe that Stop China Now, Inc. was not the true source of the \$1,600,000 contributed in its name to Save Western Culture, and that Stop China Now, Inc. served as a straw donor for this contribution. Stop China Now, Inc. transmitted this contribution for the purpose of concealing the identity or identities of the true donor or donors, in violation of 52 U.S.C. § 30122.

##### **Save Western Culture Knowingly Accepted A Contribution Made By One Person in the Name of Another Person in Violation of 52 U.S.C. § 30122**

19. The available information supports finding reason to believe that Save Western Culture had knowledge that Stop China Now, Inc. was not the true source of the \$1,600,000 contributed in the name of Stop China Now, Inc. and that Stop China Now, Inc. was, in fact, a straw donor that transmitted a contribution for the purpose of concealing the identity or identities of the true donor or donors. Accordingly, Save Western Culture knowingly accepted a contribution made by one person in the name of another person in violation of 52 U.S.C. § 30122.

### **PRAYER FOR RELIEF**

20. The Commission should find reason to believe that Stop China Now, Inc. and Save Western Culture violated the above-stated provisions of the Act and Commission regulations. The Commission should conduct an immediate investigation under 52 U.S.C. § 30109(a)(2) and determine and impose

---

<sup>13</sup> Statement of Reasons of Vice Chair Allen Dickerson and Commissioners Sean J. Cooksey and James E. “Trey” Trainor, III in MUR 7754 (Dec. 1, 2021) at 4-5.

<sup>14</sup> *Id.* at 6.

<sup>15</sup> Statement of Reasons of Chair Shana M. Broussard and Commissioner Ellen L. Weintraub in MUR 7754 (Dec. 1, 2021) at 9.

<sup>16</sup> Statement of Reasons of Vice Chair Allen Dickerson and Commissioners Sean J. Cooksey and James E. “Trey” Trainor, III in MUR 7754 (Dec. 1, 2021) at 6.

appropriate sanctions for any and all violations. Further, the Commission should enjoin the respondents from committing any future violations, and impose any additional necessary and appropriate remedies to ensure respondents' future compliance with the Act.

December 23, 2024

Respectfully Submitted,

---

Caitlin Sutherland, Executive Director  
Americans for Public Trust  
107 South West Street, Suite 442  
Alexandria, VA 22314

**VERIFICATION**

21. The Complainant listed below hereby verifies that the statements made in the attached Complaint are, upon information and belief, true.

For Complainant “Americans for Public Trust”

\_\_\_\_\_  
Caitlin Sutherland

City of Arlington  
Commonwealth of Virginia

The foregoing instrument was subscribed and sworn to before me this 23rd day of December 2024 by Caitlin Sutherland.

\_\_\_\_\_  
Notary Public

Notary registration number: \_\_\_\_\_

My commission expires: \_\_\_\_\_