

In 2021, Leonard Leo’s BH Fund Was The Sole Contributor To People United For Privacy, An Organization That Opposes The “For The People” Act And Other Legislation That Would Require Politically-Engaged Nonprofits To Reveal Their Donors.

SUMMARY: As the conservative activist Leonard Leo has forged an [“opaque, sprawling network”](#) of politically-engaged nonprofits, he also funded a separate organization to help keep his web in the shadows. [People United For Privacy](#) is a non-profit organization that has opposed congressional legislation that would require Leo’s well-endowed, politically-oriented nonprofits to reveal their donors’ identities. In 2021, Leo’s BH Fund contributed \$600,000 to PUP and was the group’s sole funder that year, according to a [tax filing obtained by Accountable.US](#).

Since its founding in 2017, PUP has been a beneficiary of Leo’s largesse as well as that of his [“longtime ally” Neil Corkery](#). Accountable.US’ review of PUP’s annual returns revealed that donations from organizations connected to Leo and Corkery have accounted for at least 76% of PUP’s total intake of contributions over the past four years.

PUP has used these funds to lobby against congressional legislation, like the “For The People” Act, which would require nonprofits to reveal their donors’ identities. In the first three quarters of 2022, PUP spent \$20,000 lobbying Congress to oppose any measure that would force Leo to show who is behind [the billions of dollars](#) now coursing through his network and [influencing America’s courts and elections](#).

BH Fund Contributed \$600,000 To People United For Privacy In 2021 And Was Its Sole Funder That Year

BH Fund Was The Sole Funder Of People United For Privacy In 2021. According to their 2021 form 990, People United for Privacy received \$600,000 in revenue in 2021. BH Fund listed a \$600,000 contribution to People United for Privacy for “general operating” that same year. [People United for Privacy 2021 990, accessed [12/13/22](#), BH Fund 2021 990, accessed [12/13/22](#)]

BH Fund Contributed \$600,000 To People United For Privacy For “General Operating” In 2021.

Name and address	People United for Privacy 2101 L St NW Ste 800 Washington, DC 20037	82-3395877	600,000
IRC code section	501(c)(4)		
Method of valuation			
Desc. of Non-Cash Asst.			
Purpose of grant	General Operating		

PUP Reported Receiving \$600,000 From A Single Contributor In 2021, Meaning The BH Fund Was The Group’s Sole Funder.

Schedule B (Form 990) (2021)		Page 2	
Name of organization		Employer identification number	
PEOPLE UNITED FOR PRIVACY		82-3395877	
Part I 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
1	_____	\$ 600,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> <small>(Complete Part II for noncash contributions.)</small>

[People United For Privacy [2021 990](#), Page 14]

People United for Privacy Is An Organization That Opposes Public Disclosure Of Nonprofit Donors’ Identities.

PUP Has Stated Its Opposition To The “For The People” Act, Which Would Require Some Politically-Engaged Nonprofits To Disclose Their Donors’ Identities.

People United For Privacy Is A D.C.-Based Nonprofit Organization That Opposes Mandated Public Disclosure Of Nonprofit Donors’ Names And Addresses On The Basis That Such A Disclosure Would Violate Their Right To Privacy. “Across the country there’s a growing call to force non-profit groups like the Salvation Army, NRA, Sierra Club, and even some churches, to report the names and addresses of their donors to the government. The government would post this information on a public website that anyone could see...Every American has the right to support causes they believe in without fear of harassment or intimidation. To keep that right a reality, we must protect individual privacy. We must protect people’s ability to come together in support of their shared values. We must protect the resources organizations need to make their voices heard.” [People United For Privacy, [12/13/22](#)]

PUP Has Opposed Congressional Democrats’ “For The People” Act, Which Would Require Some Politically-Engaged Nonprofits To Reveal Their Donors. “America’s great tradition of free speech is under attack. H.R. 1 and S. 1, the deceptively named “For the People Act,” not only undermine states’ ability to reform their election processes, these measures also squelch speech by requiring nonprofits that communicate about issues to disclose their donors. Groups, including charities, that grant more than \$10,000 to another organization that then spends money discussing policy issues also will have to disclose their donors. This aggressive mandate violates Americans’ privacy, facilitates harassment, and will decrease civic engagement.” [People United For Privacy, [02/2021](#)]

- **The “For The People” Act Would Also Expand Access To The Ballot Box And Grant The District Of Columbia Statehood.** “The bill, clocking in at 818 pages,

includes a laundry list of Democratic priorities like expanded ballot access, tighter controls on political money and support for District of Columbia statehood. It had no chance of becoming law when Republicans controlled the Senate and the White House. But with Democrats in power, the wish list has become a potentially historic law and the most pervasive overhaul of federal election rules in recent memory.” [The New York Times, [07/01/21](#)]

PUP Hired The Market Research Firm Heart+Mind Strategies To Conduct A Survey Of Michigan Voters, Which Found “Private Giving’ And ‘Donor Privacy’ As The Key Terms To Turn The Tide Pushing ‘Dark Money’ Reforms.” “Our Word Equity tool found “private giving” and “donor privacy” as the key terms to turn the tide pushing “dark money” reforms. These terms and messaging framing strategies changed the debate and trajectory of government collecting information and data on givers. Our work resulted in a more effective messaging strategy for the Foundation’s advocacy against donor restriction regulations in non-profits.” [[Heart+Mind Strategies](#)]

PUP Has Coordinated Their Opposition To The “For The People” Act With Other Groups, Like The State Policy Network And Americans For Tax Reform. “The State Policy Network, a confederation of right-wing think tanks with affiliates in every state, convened the conference call days after the Democrats’ twin victories in the Senate runoffs in Georgia, which meant that the Party had won the White House and majorities in both houses of Congress, making it likely that the For the People Act would move forward. Participants included Heather Lauer, the executive director of People United for Privacy, a conservative group fighting to keep nonprofit donors’ identities secret, and Grover Norquist, the founder and president of Americans for Tax Reform, who expressed alarm at the damage that the disclosure provisions could do. ‘The left is not stupid, they’re evil,’ he warned. ‘They know what they’re doing. They have correctly decided that this is the way to disable the freedom movement.’” [The New Yorker, [03/29/21](#)]

In The First Three Quarters Of 2022, PUP Spent \$20,000 Lobbying Congress In “Support For Nonprofit Donor Privacy Protections And [In] Opposition To Nonprofit Donor Disclosure Mandates.” [OpenSecrets, [12/14/22](#)]

LOBBYING ACTIVITY. Select as many codes as necessary to reflect the general issue areas in which the registrant engaged in lobbying on behalf of the client during the reporting period. Using a separate page for each code, provide information as requested. Add additional page(s) as needed.

15. General issue area code CIV

16. Specific lobbying issues

Support for nonprofit donor privacy protections and opposition to nonprofit donor disclosure mandates.

[2022 Q3 Lobbying Report, [10/17/22](#)]

Contributions From Groups Linked To Leonard Leo And His “Close Ally” Neil Corkery Have Accounted For At Least 76% Of All Contributions To PUP Since The Organization Filed Its First Annual Return With The IRS In 2018.

PUP Received Contributions From Groups Linked To Leo And Corkery In 2018 And 2019.

In 2018, The First Year That PUP Filed An Annual Return With The 990, PUP Receiving A Single Contribution Worth \$500,000.

Schedule B (Form 990, 990-EZ, or 990-PF) (2018)		Page 2	
Name of organization		Employer identification number	
PEOPLE UNITED FOR PRIVACY		82-3395877	
Part I 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
1		\$ 500,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions.)

[People United for Privacy [2018 990](#), Page 14]

This Donation Came From The Wellspring Committee.

(4) People United for Privacy	82-3395877	501 c 4	500,000	n/a	General support
-------------------------------	------------	---------	---------	-----	-----------------

[Wellspring Committee [2018 990](#), Page 17]

- The Wellspring Committee's Sole Officer That Year Was Neil Corkery.**

(A) Name and Title	(B) Average hours per week (list any hours for related organizations below dotted line)	(C) Position (do not check more than one box, unless person is both an officer and a director/trustee)						(D) Reportable compensation from the organization (W-2/1099-MISC)	(E) Reportable compensation from related organizations (W-2/1099-MISC)	(F) Estimated amount of other compensation from the organization and related organizations
		Individual trustee or director	Institutional trustee	Officer	Key employee	Highest compensated employee	Former			
(1) Neil Corkery President	10 00 0 00	X		X				36,000	0	0
(2)										

[Wellspring Committee [2019 990](#), Page 7]

- Neil Corkery And His Wife Ann Are "Close Allies" Of Leonard Leo Who Has Served As A Board Member Or Treasurer Of Leo's Organizations.** "A key part of those efforts was a new nonprofit called the Judicial Confirmation Network, or JCN. Tax filings show it was based at the home of Ann and Neil Corkery, close allies of Leo who have served as board members or treasurers of organizations run by Leo and a small group of interconnected activists." [The Washington Post, [05/21/19](#)]

In 2019, PUP Reported Receiving Contributions Totalling \$500,000.

Revenue		Prior Year	Current Year
		8 Contributions and grants (Part VIII, line 1h)	500,000
9 Program service revenue (Part VIII, line 2g)	0	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)	500,000	500,000	

[People United For Privacy [2019 990](#), Page 1]

These Contributions Can Be Traced To A \$500,000 Grant That PUP Received From The Rule Of Law Trust.

2 Describe in Part IV the organization's procedures for monitoring the use of grant funds in the United States.

Part II Grants and Other Assistance to Domestic Organizations and Domestic Governments. Complete if the organization answered "Yes" on Form 990, Part IV, line 21, for any recipient that received more than \$5,000. Part II can be duplicated if additional space is needed.

1 (a) Name and address of organization or government	(b) EIN	(c) IRC section (if applicable)	(d) Amount of cash grant	(e) Amount of non-cash assistance	(f) Method of valuation (book, FMV, appraisal, other)	(g) Description of noncash assistance	(h) Purpose of grant or assistance
(1) America Engaged 1101 Wilson Boulevard, 6th Floor Arlington, VA 22202	81-2072162	501 c 4	895,000	0		n/a	General support
(2) People United for Privacy 8323 Linville Rd Oak Ridge, NC 27310	82-3395877	501 c 4	500,000	0		n/a	General support
(3)							

[Rule of Law Trust [2019 990](#), Page 18]

- **Rule Of Law Trust Is 501(c)(4) Organization Whose Sole Officer In 2019 Was Leonard Leo.**

3 Indicate whether any related organization compensated any current officer, director, or trustee.

(A) Name and title	(B) Average hours per week (list any hours for related organizations below dotted line)	(C) Position (do not check more than one box, unless person is both an officer and a director/trustee)						(D) Reportable compensation from the organization (W-2/1099-MISC)	(E) Reportable compensation from related organizations (W-2/1099-MISC)	(F) Estimated amount of other compensation from the organization and related organizations
		Individual trustee or director	Institutional trustee	Officer	Key employee	Higher compensated individual	Former			
(1) Leonard Leo Trustee	5.00			X						
(2)	0.00	X		X			0	0	0	

[Rule of Law Trust [2019 990](#), Page 7]

In 2020, People United For Privacy Received A \$500,000 Grant From A Single Contributor Who Has Never Been Publicly Identified.

Schedule B (Form 990, 990-EZ, or 990-PF) (2020) Page **2**

Name of organization: **PEOPLE UNITED FOR PRIVACY** Employer identification number: **82-3395877**

Part I 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
1		\$ <u>500,000.</u>	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions.)

[People United For Privacy [2020 990](#), Page 14]