

Leonard Leo's Americans For Public Trust Operates As A Small Player In The Constellation Of DC's Conservative "Accountability" Groups, But Pays Leo's Consulting Firm a Hefty Consulting Fee

Americans for Public Trust cuts a very modest profile in the universe of right-wing "accountability" groups operating in DC. The group brings in less than \$2 million annually, with most — and perhaps all — of the money coming from the Leonard Leo network of groups like DonorsTrust. This puts them well behind other "accountability" focused groups like the Foundation for Government Accountability and Capital Research Center, and far below major right wing groups like Heritage Foundation and the Conservative Partnership Institute when it comes to funding.

Of their less than \$2 million a year, they routinely spend hundreds of thousands of those dollars with Leonard Leo's for-profit consulting firm, CRC Advisors. In 2022, despite having their annual revenue fall by more than 50%, Americans for Public Trust actually **increased** the percentage of their annual budget that they spent with Leo's for-profit firm.

In addition to modest finances, Americans for Public Trust has been implicated in amateurish controversies including failing to properly register their fundraising apparatus in Virginia and possibly violating their tax status by using false information in overtly political advertisements.

Americans For Public Trust Receives Far Less Money Than Several Comparable Groups On The Right

Annual Revenue Of Right Leaning "Accountability" Groups

	Americans for Public Trust	Foundation for Government Accountability	Capital Research Center	American Accountability Foundation	Project Veritas
2022	\$1,584,035	\$14,025,283	\$7,181,137	\$889,754	-
2021	\$3,628,537	\$13,152,294	\$6,083,008	\$551,544	\$20,703,077
2020	\$1,489,300	\$10,609,566	\$4,880,833	-	\$21,034,786

Annual Revenue Of Major Right Leaning Groups Generally

	Americans for Public Trust	Heritage Foundation	Conservative Partnership Institute	Alliance Defending Freedom
2022	\$1,584,035	\$106,329,524	\$36,397,454	\$104,490,113

2021	\$3,628,537	\$101,783,032	\$45,707,730	\$78,833,050
2020	\$1,489,300	\$119,134,479	\$6,202,407	\$65,187,555

The Limited Funding Americans For Public Trust Does Receive Primarily Flows From Leonard Leo's Network.

DonorsTrust, Known As The “Dark Money ATM Of The Right,” Is Closely Tied To Leonard Leo's Network, With Millions Of Dollars Flowing Between DonorsTrust And Leo's Groups.

DonorsTrust Is An Influential Right-Wing Donor Group Non-Profit Dubbed The “Dark Money ATM Of The Right.” "They all have one thing in common: They received anonymous funding funneled through a single conservative dark money behemoth. That's the news in the latest IRS filing from Donors Trust—a conservative, Koch-aligned nonprofit which does not need to reveal the names of its donors and has been called the 'dark money ATM of the right.'" [The Daily Beast, [11/22/21](#)]

- **DonorsTrust Acts As "A Go-Between" For Wealthy Donors To Anonymously Give Donations To Largely "Right-Leaning, Libertarian, And Free-Market Advocates."** "The Donors Trust primarily funds right-leaning, libertarian, and free-market advocates. It describes itself as 'a charitable savings account'—a go-between that allows wealthy donors to deposit money in lump sums, where it gets invested at tax-free growth. They can later direct contributions at any time while remaining anonymous." [The Daily Beast, [11/22/21](#)]

In 2021, Right-Wing Court “Architect” Leonard Leo's 85 Fund Received A \$17.1 Million Gift Through DonorsTrust. “One of the biggest conservative dark money organizations in the nation was boosted last year by two separate anonymous gifts, each totaling more than \$425 million dollars. The money sent to DonorsTrust, a 501(c)(3) charity that has become one of the most influential conduit of funds in Republican-leaning circles, was a huge chunk of the more than \$1 billion the group brought in in 2021, according to a tax filing obtained first by POLITICO. They are among the largest ever donations to a politically-connected group. DonorsTrust used those funds to support a vast network of prominent conservative causes, including a \$17.1 million gift it made to The 85 Fund, a group founded by a major engine of the conservative movement: Leonard Leo.” [Politico, [11/16/22](#)]

- **Leonard Leo, Co-Chairman And Former Executive Vice President Of “Right-Wing Powerhouse Group The Federalist Society,” “Helped Fuel The Rise Of Five Of The Six Republican Supreme Court Justices” And Has Been Called “The Quiet Architect Of A Pivotal Shift To The Right Throughout The Federal Judiciary.”** “The 90-year-old was said to have gifted \$1.65 billion to a conservative nonprofit fronted by Leonard Leo, the cochairman of the right-wing powerhouse group The Federalist Society. Leo helped fuel the rise of five of the six Republican Supreme Court justices, as ProPublica noted, and has helped fund fights over abortion rights, voting laws, and other conservative causes.” [Insider, [08/26/22](#)]

- **Leonard Leo Has Been “The Quiet Architect Of A Pivotal Shift To The Right Throughout The Federal Judiciary” And The Federalist Society’s “Roughly 70,000 Members Represent A Vast Web Of Conservative Legal Power.”** “As executive vice president of the Federalist Society, Leo has been the quiet architect of a pivotal shift to the right throughout the federal judiciary. He was still at Cornell Law School in 1989 when he joined the society, a network of fresh legal minds who believed limited government was the best way to protect freedom and personal liberty. Today, under Leo’s leadership, the group’s roughly 70,000 members represent a vast web of conservative legal power.” [Politico Magazine, [2018](#)]

In 2020, Donors Trust—Which Is Known To “Steer Money Into Conservative Politics”—Received \$59.1 Million From The Marble Freedom Trust, A Conservative Group “Controlled By Leonard Leo.” “A new conservative nonprofit group scored a \$1.6 billion windfall last year via a little-known donor — an extraordinary sum that could give Republicans and their causes a huge financial boost ahead of the midterms, and for years to come. The source of the money was Barre Seid, an electronics manufacturing mogul, and the donation is among the largest — if not the largest — single contributions ever made to a politically focused nonprofit. The beneficiary is a new political group controlled by Leonard A. Leo, an activist who has used his connections to Republican donors and politicians to help engineer the conservative dominance of the Supreme Court and to finance battles over abortion rights, voting rules and climate change policy. [...] For perspective, the \$1.6 billion that the Marble trust reaped from the sale is slightly more than the total of \$1.5 billion spent in 2020 by 15 of the most politically active nonprofit organizations that generally align with Democrats, according to an analysis by The Times. [...] Two other funds that steer money into conservative politics, Donors Trust and Schwab Charitable Fund, received a total of \$59.1 million from the Marble trust, according to the filing.” [The New York Times, [08/22/22](#)]

In 2022, Nearly All Of APT’s Funding Came Through DonorsTrust.

In 2022, Nearly All Of APT’s \$1.6 Million In Donations Came Through DonorsTrust. “The group’s donations fell significantly between 2021 and 2022, from about \$3.6 million to \$1.6 million. [...] It also appears that nearly all of Americans for Public Trust’s contributions and grants came from DonorsTrust, a prominent conservative donor fund. It gave the group \$1,579,000 in 2022, according to DonorsTrust’s recent filing.” [Politico, [11/15/23](#)]

From 2020 Through 2022, Americans For Public Trust Received Less Than \$6 Million From DonorsTrust, A Small Pittance Of The \$175.6 Million Leonard Leo’s 85 Fund Poured Into DonorsTrust During The Same Time Period.

In Tax Year 2022, Americans For Public Trust Received Nearly \$1.58 Million From DonorsTrust, The Same Year Leo’s 85 Fund Gave \$92 Million To Donors Trust And Donors Trust Gave Leonard Leo’s 85 Fund \$50,000:

Americans for Public Trust 107 South West Street Alexandria, VA 22314	84-4413894	501(c)(3)	1,579,000.	0.	N/A	N/A	for general operations
---	------------	-----------	------------	----	-----	-----	------------------------

[Donors Trust, Inc. IRS Form 990, 2022, [10/27/23](#)]

Name and address	Donors Trust 1800 Diagonal Rd Ste 280 Alexandria, VA 22314	52-2166327	92,000,000
IRC code section	501 c 3		
Method of valuation			
Desc. of Non-Cash Asst.			
Purpose of grant	General Support		

[The 85 Fund IRS Form 990, 2022, accessed [12/18/23](#)]

The 85 Fund 3220 N Street, NW Washington, DC 20007	20-2466871	501(c)(3)	50,000.	0.	N/A	N/A	for the Honest Elections Project
--	------------	-----------	---------	----	-----	-----	----------------------------------

[Donors Trust, Inc. IRS Form 990, 2022, [10/27/23](#)]

In Tax Year 2021, Americans For Public Trust Received Over \$3.7 Million From DonorsTrust, The Same Year Leo's 85 Fund Gave Over \$71 Million To DonorsTrust And DonorsTrust Gave Leonard Leo's 85 Fund Over \$17 Million:

Americans for Public Trust 107 South West Street Suite 442 Alexandria, VA 22314	84-4413894	501(c)(3)	3,765,500.	0.	N/A	N/A	for general operations
---	------------	-----------	------------	----	-----	-----	------------------------

[Donors Trust, Inc. IRS Form 990, 2021, [11/15/22](#)]

Name and address	Donors Trust 1800 Diagonal Rd Ste 280 Alexandria, VA 22314	52-2166327	71,145,000
IRC code section	501 c 3		
Method of valuation			
Desc. of Non-Cash Asst.			
Purpose of grant	General Support		

[The 85 Fund IRS Form 990, 2021, accessed [12/18/23](#)]

The 85 Fund 3220 N Street, NW Suite 268 Washington, DC 20007	20-2466871	501(c)(3)	17,100,000.	0.	N/A	N/A	for general operations
--	------------	-----------	-------------	----	-----	-----	------------------------

[Donors Trust, Inc. IRS Form 990, 2021, [11/15/22](#)]

In Tax Year 2020, Americans For Public Trust Received \$900,000 From Donors Trust, That Same Year, Leo's 85 Fund Gave Over \$12.4 Million To DonorsTrust, And DonorsTrust Gave Leo's 85 Fund Over \$48.7 Million:

Americans for Public Trust 107 South West Street Suite 442 Alexandria, VA 22314	84-4413894	501(c)(3)	900,000.	0.	N/A	N/A	for general operations
---	------------	-----------	----------	----	-----	-----	------------------------

[Donors Trust, Inc. IRS Form 990, 2020, [11/15/21](#)]

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 non-cash assistance	(h) Purpose of grant or assistance
(f) Donors Trust 1800 Diagonal Rd, Ste. 280 Alexandria	52-2166327	501 c 3	12,482,846			n/a	general support

[The 85 Fund IRS Form 990, 2020, [11/15/21](#)]

The 85 Fund 3220 N Street, NW Suite 268 Washington, DC 20007	20-2466871	501(c)(3)	19,990,000.	0.	N/A	N/A	for general operations
--	------------	-----------	-------------	----	-----	-----	------------------------

[...]

Schedule I (Form 990) **Donors Trust, Inc.** 52-2166327 Page 1

Part II Continuation of Grants and Other Assistance to Domestic Organizations and Domestic Governments (Schedule I (Form 990), Part II.)

(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 non-cash assistance	(h) Purpose of grant or assistance
The 85 Fund 3220 N Street, NW Suite 268 Washington, DC 20007	20-2466871	501(c)(3)	300,000.	0.	N/A	N/A	in support of the Individual Rights in Education Project

[...]

The 85 Fund 3220 N Street, NW Suite 268 Washington, DC 20007	20-2466871	501(c)(3)	200,000.	0.	N/A	N/A	for CEI Project
The 85 Fund 3220 N Street, NW Suite 268 Washington, DC 20007	20-2466871	501(c)(3)	125,000.	0.	N/A	N/A	for Ethics and Public Policy Project

[...]

Schedule I (Form 990) **Donors Trust, Inc.** 52-2166327 Page 1

Part II Continuation of Grants and Other Assistance to Domestic Organizations and Domestic Governments (Schedule I (Form 990), Part II.)

(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 non-cash assistance	(h) Purpose of grant or assistance
The 85 Fund 3220 N Street, NW Suite 268 Washington, DC 20007	20-2466871	501(c)(3)	1,542,856.	0.	N/A	N/A	for Federalist Project
The 85 Fund 3220 N Street, NW Suite 268 Washington, DC 20007	20-2466871	501(c)(3)	250,000.	0.	N/A	N/A	for Free Speech Project
The 85 Fund 3220 N Street, NW Suite 268 Washington, DC 20007	20-2466871	501(c)(3)	20,000.	0.	N/A	N/A	for Honest Election Project
The 85 Fund 3220 N Street, NW Suite 268 Washington, DC 20007	20-2466871	501(c)(3)	50,000.	0.	N/A	N/A	for Honest Elections Project
The 85 Fund 3220 N Street, NW Suite 268 Washington, DC 20007	20-2466871	501(c)(3)	1,000,000.	0.	N/A	N/A	for judicial education projects
The 85 Fund 3220 N Street, NW Suite 268 Washington, DC 20007	20-2466871	501(c)(3)	1,000,000.	0.	N/A	N/A	for the Accountability and Civics Trust Project
The 85 Fund 3220 N Street, NW Suite 268 Washington, DC 20007	20-2466871	501(c)(3)	325,000.	0.	N/A	N/A	for the Anti New Green Deal Project
The 85 Fund 3220 N Street, NW Suite 268 Washington, DC 20007	20-2466871	501(c)(3)	1,000,000.	0.	N/A	N/A	for the Civil Liberties project
The 85 Fund 3220 N Street, NW Suite 268 Washington, DC 20007	20-2466871	501(c)(3)	5,000,000.	0.	N/A	N/A	for the Court Education Project

Schedule I (Form 990)

[...]

Part II Continuation of Grants and Other Assistance to Domestic Organizations and Domestic Governments (Schedule I (Form 990), Part II.)							
(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 non-cash assistance	(h) Purpose of grant or assistance
The 85 Fund 3220 N Street, NW Suite 268 Washington, DC 20007	20-2466871	501(c)(3)	450,000.	0.	N/A	N/A	for the DF Project.
The 85 Fund 3220 N Street, NW Suite 268 Washington, DC 20007	20-2466871	501(c)(3)	160,000.	0.	N/A	N/A	for the Electoral College Project
The 85 Fund 3220 N Street, NW Suite 268 Washington, DC 20007	20-2466871	501(c)(3)	25,000.	0.	N/A	N/A	for the ESG Project
The 85 Fund 3220 N Street, NW Suite 268 Washington, DC 20007	20-2466871	501(c)(3)	225,000.	0.	N/A	N/A	for the FLGW Project
The 85 Fund 3220 N Street, NW Suite 268 Washington, DC 20007	20-2466871	501(c)(3)	250,000.	0.	N/A	N/A	for the Free Speech Project
The 85 Fund 3220 N Street, NW Suite 268 Washington, DC 20007	20-2466871	501(c)(3)	2,000,000.	0.	N/A	N/A	for the Government Accountability Project
The 85 Fund 3220 N Street, NW Suite 268 Washington, DC 20007	20-2466871	501(c)(3)	100,000.	0.	N/A	N/A	for the Honest Election Project
The 85 Fund 3220 N Street, NW Suite 268 Washington, DC 20007	20-2466871	501(c)(3)	100,000.	0.	N/A	N/A	for the Independent Woman Project
The 85 Fund 3220 N Street, NW Suite 268 Washington, DC 20007	20-2466871	501(c)(3)	500,000.	0.	N/A	N/A	for the Journalist Investigations Project

Schedule I (Form 990)

[...]

Part II Continuation of Grants and Other Assistance to Domestic Organizations and Domestic Governments (Schedule I (Form 990), Part II.)

(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 non-cash assistance	(h) Purpose of grant or assistance
The 85 Fund 3220 N Street, NW Suite 268 Washington, DC 20007	20-2466871	501(c)(3)	10,000,000.	0.	N/A	N/A	for the LBH Project
The 85 Fund 3220 N Street, NW Suite 268 Washington, DC 20007	20-2466871	501(c)(3)	350,000.	0.	N/A	N/A	for the Milloy E & ELI Project
The 85 Fund 3220 N Street, NW Suite 268 Washington, DC 20007	20-2466871	501(c)(3)	1,000,000.	0.	N/A	N/A	for the Passages Project
The 85 Fund 3220 N Street, NW Suite 268 Washington, DC 20007	20-2466871	501(c)(3)	600,000.	0.	N/A	N/A	for the PEKDU project
The 85 Fund 3220 N Street, NW Suite 268 Washington, DC 20007	20-2466871	501(c)(3)	750,000.	0.	N/A	N/A	for the Project with Mercatus Center
The 85 Fund 3220 N Street, NW Suite 268 Washington, DC 20007	20-2466871	501(c)(3)	400,000.	0.	N/A	N/A	for the Public Interest Legal Project
The 85 Fund 3220 N Street, NW Suite 268 Washington, DC 20007	20-2466871	501(c)(3)	500,000.	0.	N/A	N/A	for the Speech First Project
The 85 Fund 3220 N Street, NW Suite 268 Washington, DC 20007	20-2466871	501(c)(3)	200,000.	0.	N/A	N/A	for the TP Campus Project
The 85 Fund 3220 N Street, NW Suite 268 Washington, DC 20007	20-2466871	501(c)(3)	300,000.	0.	N/A	N/A	for voter education program

Schedule I (Form 990)

[Donors Trust Inc. IRS Form 990, 2020, [11/15/21](#)]

Another Leo-Backed Group, The Legacy Foundation, Gave APT Nearly \$600,000 In 2020.

The Legacy Foundation Gave Americans For Public Trust Nearly \$600,000 In 2020.

According to their Form 990, the Legacy Foundation gave Americans for Public Trust \$589,000 in fiscal year 2020. [Legacy Foundation, 2020 Form 990, accessed [8/25/22](#)]

Leonard Leo's 85 Fund Gave The Legacy Foundation \$750,000 In 2020:

(*) The Legacy Foundation 600 Fourth St., 360 Sioux City, IA 51101	28-3853831	501 c 3	750,000			n/a	general support
---	------------	---------	---------	--	--	-----	-----------------

[The 85 Fund IRS Form 990, 2020, [11/15/21](#)]

- The 85 Fund Is A Dark Money Group Integral To Leo's Network.** "A dark money group that was founded by one of former President Donald Trump's key allies raised over \$20 million in 2020 and used the money to help finance various conservative groups. Leonard Leo's The 85 Fund received the money through the Donors Trust, a donor-advised nonprofit group that funnels money from often wealthy conservative financiers to other organizations, according to a Donors Trust 990 tax filing first seen by CNBC. The 85 Fund is part of Leo's extensive network of organizations that seek to influence policy, the president's picks for the judiciary and the larger conservative

movement. Leo, who is the co-chairman of the Federalist Society, was a key outside advisor for Trump when the then-president chose Brett Kavanaugh and Neil Gorsuch for slots on the Supreme Court.” [CNBC, [11/18/21](#)]

- **The 85 Fund Is A Rename Of The Judicial Education Project, Which Is Closely Associated With The Right Wing Dark Money Group Judicial Crisis Network.** "The organization has deftly hidden the changes to its name from public view. In December, the Judicial Education Project formally changed its legal name to The 85 Fund [...] The Judicial Education Project is closely aligned with the Judicial Crisis Network, a group with unmatched influence in recent years in shaping the federal judiciary. Judicial Crisis Network spearheaded the campaigns to get Gorsuch and Kavanaugh confirmed to the Supreme Court, spending millions of dollars in each instance. It has also spent significantly on critical state supreme court races across the country." [OpenSecrets, [5/27/20](#)]
- **The Judicial Education Project Legally Changed its Name to The 85 Fund on January 30th, 2020.** According to the Virginia State Corporation Commission, the Judicial Education Project, originally founded in 2004, regained “active” status on 12/10/2019. The Judicial Education Project legally changed its name to “The 85 Fund” on 1/31/2020. [Virginia State Corporation Commission, Last Accessed: [2/23/22](#)]

Of The Money APT Does Bring In, Millions Goes Straight To Leonard Leo’s For-Profit Consulting Firm CRC Advisors—In 2022 Alone, APT Spent 28% Of Its Expenses With Leo’s Firm Even As Its Revenue Fell By More Than 50% From The Previous Year.

From 2020 Through 2022, Americans For Public Trust Paid Leonard Leo’s For-Profit Public Relations Consulting Firm CRC Advisors Over \$1.7 Million.

In 2022, Americans For Public Trust Paid CRC Advisors Nearly \$481,000 For “Research” And Other Services:

Section B. Independent Contractors		
1 Complete this table for your five highest compensated independent contractors that received more than \$100,000 of compensation from the organization. Report compensation for the calendar year ending with or within the organization's tax year.		
(A) Name and business address	(B) Description of services	(C) Compensation
CRC Advisors 2850 Eisenhower Ave. Ste. 402 Al	Research and cons	480,905.

[Americans for Public Trust IRS Form 990, 2022, accessed [12/18/23](#)]

In 2021, Americans For Public Trust Paid CRC Advisors Over \$470,000 For “Public Policy” Related Services:

for services rendered to the organization? If yes, complete Schedule J for such person.			0	1	X
Section B. Independent Contractors					
1 Complete this table for your five highest compensated independent contractors that received more than \$100,000 of compensation from the organization. Report compensation for the calendar year ending with or within the organization's tax year.					
(A) Name and business address		(B) Description of services		(C) Compensation	
Cascade Strategies, LLC 2032 Newport Way NW		Research		130,000.	
Cooper & Kirk, PLLC 1523 New Hampshire Ave NW		Legal		110,000.	
CRC Advisors 2850 Eisenhower Ave. Ste. 402 A		Public policy str		470,092.	

[Americans for Public Trust IRS Form 990, 2021, accessed [12/18/23](#)]

In 2020, Americans For Public Trust Spent Paid \$220,000 To Creative Response Concepts Inc. For “Public Relations”:

Section B. Independent Contractors		
1 Complete this table for your five highest compensated independent contractors that received more than \$100,000 of compensation from the organization. Report compensation for the calendar year ending with or within the organization's tax year.		
(A) Name and business address	(B) Description of services	(C) Compensation
AMERICA RISING CORPORATION, 1500 WILSON BLVD 5TH FLOOR, ARLINGTON, VA 22209	RESEARCH CONSULTING	324,000.
CREATIVE RESPONSE CONCEPTS INC, 2850 EISENHOWER AVE, FIRST FLOOR, ALEXANDRIA,	PUBLIC RELATIONS	220,000.

[Americans for Public Trust IRS Form 990, 2020, [11/10/21](#)]

Leonard Leo Is The Chairman Of CRC Advisors, Formerly Known As Creative Response Concepts, Inc. “Conservative powerhouse Leonard Leo tells Axios that he’ll step aside from the daily running of the Federalist Society to focus on a new venture...The new venture will be called CRC Advisors [...] The new venture will go beyond the anonymous money networks they’ve already built and weaponized in the conservative legal movement.” [Axios, [1/7/20](#)]

CHAIRMAN	Yes	LEONARD LEO
----------	-----	-------------

[Entity ID 03430998, Virginia Corporation Commission, accessed [12/18/23](#)]

06/16/2020	CREATIVE RESPONSE CONCEPTS, INC.	Former Name
------------	----------------------------------	-------------

[Entity ID 03430998, Virginia Corporation Commission, accessed [12/18/23](#)]

In 2020, Leonard Leo Stepped Down From The Federalist Society To Launch CRC Advisors, The Successor Of CRC Strategies. “Leonard Leo, executive vice president of the Federalist Society, a conservative legal group, is stepping aside from his daily duties at the organization to launch a consulting firm that will fund conservative causes. The new firm, called CRC Advisors, is being billed as a “full-service conservative public affairs powerhouse.” Leo will be chairman of CRC Advisors, which springs from an existing conservative public relations firm called CRC Strategies.” [ABA Journal, [1/8/20](#)]

CRC Advisors Provides Consulting For “Public Policy Projects, Coalitions, And Groups,” Claiming To Connect Non-Profits For Funding. “At CRC Advisors, we don’t just represent you. We work with you to build winning ventures. WE INCUBATE public policy projects, coalitions, and groups: mission-driven, focused, results-oriented. WE CONNECT best-in-class professionals, successful non-profits, and savvy philanthropists, forging partnerships tailored for success. WE STRENGTHEN our clients by helping them identify and bring together the

capabilities they need to win, whether in public policy or private enterprise.” [CRC Advisors, accessed: [2/16/22](#)]

In 2022, Even As APT’s Total Revenue Fell By Over 50%, It Increased Its Spending On Leonard Leo’s CRC Advisors, Which Took 28% Of APT’s Total Expenses In The Year.

From 2021 To 2022, Americans For Public Trust’s Total Revenue Fell From Over \$3.6 Million To About \$1.5 Million—A Decrease Of Over 56%:

Prior Year	Current Year
[...]	
3,628,537.	1,584,035.

[Americans for Public Trust IRS Form 990, 2022, accessed [12/18/23](#)]

In 2022, Americans For Public Trust Paid CRC Advisors \$480,905—Over 28% Of Its Total Expenses:

Section B. Independent Contractors

1 Complete this table for your five highest compensated independent contractors that received more than \$100,000 of compensation from the organization. Report compensation for the calendar year ending with or within the organization's tax year.

(A) Name and business address	(B) Description of services	(C) Compensation
CRC Advisors 2850 Eisenhower Ave. Ste. 402 A	Research and cons	480,905.
Cooper & Kirk, PLLC 1523 New Hampshire Ave NW	Legal	130,000.
Holtzman Vogel 2300 N St NW Ste. 643 Washing	Legal	388,770.

[Americans for Public Trust IRS Form 990, 2022, accessed [12/18/23](#)]

- In 2022, Americans For Public Trust Reported Over \$1.7 Million In Total Expenses:

Prior Year	Current Year
[...]	
3,445,937.	1,716,618.

18 Total expenses. Add lines 13-17 (must equal Part IX, column (A), line 25).

[Americans for Public Trust IRS Form 990, 2022, accessed [12/18/23](#)]

In 2021, Americans For Public Trust Reported Paying \$470,092 To CRC Advisors:

(A) Name and business address	(B) Description of services	(C) Compensation
Cascade Strategies, LLC 2032 Newport Way NW	Research	130,000.
Cooper & Kirk, PLLC 1523 New Hampshire Ave NW	Legal	110,000.
CRC Advisors 2850 Eisenhower Ave. Ste. 402 A	Public policy str	470,092.
Holtzman Vogel 2300 N Street NW Ste. 643A Wa	Legal	421,292.
Mentzer Media Services 2210 Grey Fox Court Be	Media	1,370,000.

[Americans for Public Trust IRS Form 990, 2021, accessed [12/18/23](#)]

Americans For Public Trust Has Been Accused Of Violating Tax And Charitable Reporting Laws On At Least Two Separate Occasions

Americans For Public Trust Has Been Accused Of Violating Federal Tax Law And Virginia's Charitable Solicitation Law

In February 2022, Americans For Public Trust Was Accused Of Violating Their Tax Status By Running “‘Unsupported And Misleading’ Political Attack Ads,” Which Made Up About A Quarter Of The Group’s Ad Spending At The Time. .

In February 2022, Americans For Public Trust Was Accused Of Violating IRS Rules By Running “‘Unsupported And Misleading’ Political Attack Ads.” In February 2022, “End Citizens United filed a complaint against [Adam] Laxalt’s ‘dark money’ group Americans for Public Trust, alleging that the organization broke the rules after running hundreds of thousands of dollars worth of—in the complaint’s words—‘unsupported and misleading’ political attack ads.” [Daily Beast, [02/15/22](#)]

- **The Complaint Noted That As A 501(C)3, The Organization Was “Prohibited From Directly Or Indirectly Participating In, Or Intervening In, Any Political Campaign On Behalf Of (Or In Opposition To) Any Candidate For Elective Public Office.”** “As a so-called “social welfare” charity organized under section 501(c)3 of the tax code, APT is ‘absolutely prohibited from directly or indirectly participating in, or intervening in, any political campaign on behalf of (or in opposition to) any candidate for elective public office.’ Ironically, the spots cited in the complaint attempt to expose alleged corruption associated with Democratic politicians and liberal dark money.” [Daily Beast, [02/15/22](#)]
- **The Americans For Public Trust Ads Targeted Democratic Politicians And “Pushed A Number Of False Claims.”** The “group ran a series of attack ads targeting Democratic politicians. According to the complaint, those ads pushed a number of false claims, including about President Joe Biden’s school re-opening policies and the influence that outside spending groups wield over longtime dark money critic Sen. Sheldon Whitehouse (D-RI). IRS rules prohibit social welfare organizations from promoting false claims under the guise of ‘education.’” [Daily Beast, [02/15/22](#)]

According To The Complaint, APT Spent Over \$480,000 Of Its \$1.8 Million In Ad Spending On The “Political Attack Ads.” “When Republican Senate hopeful Adam Laxalt was Nevada’s attorney general, he was responsible for enforcing the law. Now, a watchdog alleges that his nonprofit violated federal regulations governing charities, and is asking the IRS to revoke the group’s tax status. On Tuesday, End Citizens United filed a complaint against Laxalt’s ‘dark money’ group Americans for Public Trust, alleging that the organization broke the rules after running hundreds of thousands of dollars worth of—in the complaint’s words—‘unsupported and misleading’ political attack ads. [...] To date, APT has spent about \$1.8 million on ad buys, according to data cited in the complaint. But more than \$482,000 of that, according to ECU, went toward promoting a thinly veiled partisan misinformation operation.” [Daily Beast, [02/15/22](#)]

In June 2022, Americans For Public Trust Was Accused Of Violating Virginia's Charitable Solicitation Law Because They Were Not Registered To Seek Donations In The State.

In June 2022, Americans For Public Trust Was Accused Of Illegally Fundraising In Virginia. "Americans for Public Trust, which bills itself as an ethics watchdog, is illegally fundraising in Virginia, according to a complaint filed by the Campaign for Accountability, a nonprofit watchdog group, to the Virginia Department of Agriculture and Consumer Services and the commonwealth's attorney for the city of Alexandria, where APT is based." [Salon, [06/21/22](#)]

- **At The Time, Americans For Public Trust Was Not Registered With The Virginia Office Of Charitable And Regulatory Programs Despite State Law Requiring Such Registration Before Soliciting Contributions.** "State law requires charitable organizations to file a registration statement with the Office of Charitable and Regulatory Programs prior to any solicitation. APT has publicly stated that it solicits contributions in Virginia but the state's Charitable Organization Database "contains no record of Americans for Public Trust ever filing such a registration statement in the more than two years that it has been in operation," Campaign for Accountability said in a complaint to Joseph Guthrie, the commissioner of the state Department of Agriculture and Consumer Services, that it shared exclusively with Salon." [Salon, [06/21/22](#)]
- **"Later In 2022, APT Went On To Register With The Virginia Department Of Agriculture And Consumer Services, Seemingly In Response To The Earlier Complaint."** [Monitoring Influence, accessed [08/09/23](#)]