

# Hans A. Von Spakovsky Authored Project 2025's Playbook On The FEC And He Provided A Slew Of Recommendations Intended To Neuter The Bipartisan Independent Agency And Redirect Power To DOJ Political Appointees

**SUMMARY:** Hans A. Von Spakovsky — the [author of the Project 2025 Playbook on the Federal Election Commission](#) — is a [senior legal fellow](#) at The Heritage Foundation's Legal and Judicial Center and leads Heritage's Election Law Division. Von Spakovsky is also a [former FEC commissioner](#) and [member](#) of President Donald Trump's Presidential Advisory Commission on Election Integrity.

In his Project 2025 Playbook section, von Spakovsky suggested a slew of adjustments to protocols that ultimately aim to neuter the FEC and redirect power to a government-appointed position or agency:

- Von Spakovsky proposed that “[the president should vigorously oppose all efforts \[...\] to change the structure of the FEC to reduce the number of commissioners from six to five or another odd number,](#)” however, the current even-numbered structure has [prevented the FEC from enforcing the law or issuing new regulations.](#)
- He also proposed that “[the president should direct the attorney general to defend the FEC in all litigation when there is a failure of the commissioners to authorize the general counsel of the agency to defend it.](#)” This proposal comes after, in 2019, then FEC commissioner Ellen Weintraub said she would block any effort to “[allow FEC lawyers to defend the government when the fec has been sued for not enforcing the law.](#)”
- Von Spakovsky also wrote that “[the president should seriously consider recommending that Congress amend FECA to remove the agency's independent litigating authority and rely on the Department of Justice to handle all litigation involving the FEC.](#)”
- He recommended in the “multiple instances of existing statutory provisions of FECA and the accompanying FEC regulations” that have “been found unlawful or unconstitutional by federal court decisions,” “[the president should request that the commissioners on the FEC prepare such guidance](#)” or if the “FEC fails to act, the president should direct the attorney general to prepare a guidance document from the department of justice for the public.”
- Von Spakovsky recommended raising campaign “[contribution limits and index reporting requirements to inflation,](#)” which critics said would unleash [billionaires](#) and “[disproportionately benefit incumbents](#)” with established wealthy donor connections.

While von Spakovsky is currently attempting to strip the FEC of its power to implement and enforce campaign finance regulations, his broader career is marred by constant attacks on access to the ballot box:

- Von Spakovsky [worked with the American Legislative Exchange Council](#), appearing on a panel at the group's 2019 annual meeting called “How To Survive Redistricting;” he and the three other members of the panel have been called “[architects and defenders of some of the most notorious gerrymanders and voter suppression plans of this decade.](#)”
- As a director of the Public Interest Legal Foundation and manager of The Heritage Foundation's Election Law Reform Initiative, von Spakovsky [testified in support of voter restrictions at a May 2023 congressional hearing on the ACE Act.](#) The Public Interest Legal Foundation (PILF) has been [central in pushing the “once-fringe” theory of widespread voter fraud](#) over the last decade, filing lawsuits against local election rules and fueling Trump's falsehoods about the 2020 election. PILF is closely

tied to the Leo network through current and former board members, corporate officers, and funding from Leo-tied entities.

- During his tenure at the DOJ, von Spakovsky “[used every opportunity he had \[...\] to make it difficult for voters — poor, minority and democratic — to go to the polls](#),” including efforts to institute voter ID laws and purge voter rolls.
  - In 2005, he overrode career staff and approved “[a Georgia law requiring that people present photo identification to vote](#),” which career lawyers thought “would discriminate against black voters.” While advocating for the law within the DOJ, Von Spakovsky [anonymously published an article](#) advocating for similar voter ID laws.
  - In 2004, during von Spakovsky’s DOJ tenure, [two voter-advocacy groups had a meeting with Justice Department officials](#) where they presented evidence that one section of The National Voter Registration Act that “requires states to make voter registration available at social-service agencies” wasn’t being enforced. Instead of addressing that issue, a few months later, von Spakovsky [directed the office to enforce a part of the law that focused more on taking names off the voter lists](#).

**Hans Von Spakovsky Is A Senior Legal Fellow At The Heritage Foundation’s Legal And Judicial Center And Leads Heritage’s Election Law Division; He Authored The Project 2025 Playbook On The Federal Election Commission, In Which He Suggested A Slew Of Adjustments To Protocols That Ultimately Aim To Neuter The FEC And Redirect Power From The Bipartisan Commission To Political Appointees At The DOJ.**

**Hans Von Spakovsky Is A Senior Legal Fellow At The Heritage Foundation’s Legal And Judicial Center And Leads The Heritage Foundation’s Election Law Division; He Is Also A Former FEC Commissioner And Member Of President Donald Trump’s Presidential Advisory Commission On Election Integrity.**

Hans Von Spakovsky Is A Senior Legal Fellow At The Heritage Foundation’s Legal And Judicial Center, And Leads The Heritage Foundation’s Election Law Division. [The Heritage Foundation, accessed [3/4/24](#)]

Von Spakovsky Is Also A Director At The Public Interest Legal Foundation. [The Heritage Foundation, accessed [3/4/24](#)]

Von Spakovsky “Served Two Years As A Member Of The Federal Election Commission.” “Before joining Heritage in 2008, von Spakovsky served two years as a member of the Federal Election Commission, the authority charged with enforcing campaign finance laws for congressional and presidential elections, including public funding.” [The Heritage Foundation, accessed [3/4/24](#)]

In 2017, Former President Donald Trump “Appointed Von Spakovsky To The Presidential Advisory Commission On Election Integrity.” “President Donald Trump appointed von Spakovsky to the Presidential Advisory Commission on Election Integrity in 2017.” [The Heritage Foundation, accessed [3/4/24](#)]

**Hans A. Von Spakovsky Authored The Portion Of The Project 2025 Playbook On The Federal Election Commission (FEC).**

Hans A. Von Spakovsky Authored The Portion Of The Project 2025 Playbook, “Mandate For Leadership: The Conservative Promise,” On The Federal Election Commission. [Mandate For Leadership: The Conservative Promise, accessed [3/4/24](#)]

**Von Spakovsky Made A Point To Note The “Long-Held Political Tradition [...] That When A Commission Slot Held By A Member Of The Opposition Political Party Opens Up,” The President Nominates The Chosen Nominee Of The Opposition Party’s Leader In The Senate, Adding That The Tradition Had Only Been Broken Once, “When Senate Majority Leader Harry Reid Refused To Approve” Him As One Of George W. Bush’s Nominees.”**

In The FEC Section Of The Project 2025 Playbook, Von Spakovsky Outlined The “Long-Held Political Tradition [...] That When A Commission Slot Held By A Member Of The Opposition Political Party Opens Up, The President Consults With, And Nominates, The Chosen Nominee Of The Opposition Party’s Leader In The Senate.” “There is a long-held political tradition since the FEC’s founding that when a commission slot held by a member of the opposition political party opens up, the President consults with, and nominates, the chosen nominee of the opposition party’s leader in the Senate. In exchange, the Senate party leader and his caucus agree to approve the President’s nominee to fill an empty position for the President’s political party. It has also been customary to advance the two nominees of the differing political parties at the same time; this bipartisan pairing has historically permitted easy confirmation of both parties’ selectees.” [Mandate For Leadership: The Conservative Promise, accessed [3/4/24](#)]

- **Von Spakovsky Added That The Tradition Had Only Been Broken Once, “When Senate Majority Leader Harry Reid Refused To Approve One Of George W. Bush’s Nominees (Hans Von Spakovsky) For A Republican Commission Slot.”** “Thus, by convention, a Republican President will nominate a Republican and a Democrat for two open commission slots, including the choice of the Democrat Senate leader for his party’s seat. In turn, the senator will direct his party to vote to confirm both nominees. In the almost 50-year history of the FEC, this tradition has only been broken once—when Senate Majority Leader Harry Reid refused to approve one of George W. Bush’s nominees (Hans von Spakovsky) for a Republican commission slot.” [Mandate For Leadership: The Conservative Promise, accessed [3/4/24](#)]

**Spakovsky Proposed That “The President Should Vigorously Oppose All Efforts [...] To Change The Structure Of The FEC To Reduce The Number Of Commissioners From Six To Five Or Another Odd Number,” However, The Current Even-Numbered Structure Has Prevented The FEC From Enforcing The Law Or Issuing New Regulations.**

Von Spakovsky Proposed That “The President Should Vigorously Oppose All Efforts, As Proposed, For Example, In Section 6002 Of The ‘For The People Act Of 2021,’ To Change The Structure Of The FEC To Reduce The Number Of Commissioners From Six To Five Or Another Odd Number.” “The President should vigorously oppose all efforts, as proposed, for example, in Section 6002 of the ‘For the People Act of 2021,’ to change the structure of the FEC to reduce the number of commissioners from six to five or another odd number.” [Mandate For Leadership: The Conservative Promise, accessed [3/4/24](#)]

**As Democrats Have Proposed Reducing The Number Of FEC Commissioners From Six To Five, Republicans “Say Changing The Size Of The Commission And Altering Its Partisan Balance Would Inject More Politics Into The Decision-Making Process.”** “Democrats on the House Administration Committee, which hosted the hearing, are calling for changes to the makeup of the Federal Election Commission. The six-member panel is evenly split between Democrats and Republicans, a breakdown that critics say has led to partisan gridlock and hampered the commission’s ability to enforce the rules. [...] Democrats have proposed legislation reducing the number of commissioners from six to five. They say the current structure also has allowed Republican commissioners to ignore the findings of nonpartisan staff.

Republicans say changing the size of the commission and altering its partisan balance would inject more politics into the decision-making process.” [Roll Call, [9/20/23](#)]

**The Makeup Of The FEC — With Six Commissioners Split Three And Three By Political Party — Has “Frequently Left The Agency Paralyzed And Unable To Issue New Regulations, Provide Advisory Opinions To Political Actors Seeking To Understand Their Legal Obligations, Or Meaningfully Enforce The Law.”** “The FEC is the primary agency responsible for interpreting and enforcing federal campaign finance law. It is also one of the few federal agencies with evenly divided leadership: no more than three of the FEC’s six commissioners can be from the same political party, and under current law, it takes four votes for the commission to act on any significant matter, including deciding to investigate alleged legal violations. Over the last decade and a half, sharp partisan divisions among commissioners frequently left the agency paralyzed and unable to issue new regulations, provide advisory opinions to political actors seeking to understand their legal obligations, or meaningfully enforce the law.” [Brennan Center, [9/15/23](#)]

**Von Spakovsky Proposed In The Project 2025 Playbook That “The President Should Direct The Attorney General,” A Singular Political Appointee, “To Defend The FEC In All Litigation When There Is A Failure Of The Commissioners To Authorize The General Counsel Of The Agency To Defend It,” Despite Claiming The Current FEC Structure “Ensures That There Is Bipartisan Agreement” And It “Protects Against The FEC Being Used As A Political Weapon.”**

**Von Spakovsky Proposed That “The President Should Direct The Attorney General To Defend The FEC In All Litigation When There Is A Failure Of The Commissioners To Authorize The General Counsel Of The Agency To Defend It.”** “The President should direct the attorney general to defend the FEC in all litigation when there is a failure of the commissioners to authorize the general counsel of the agency to defend it.” [Mandate For Leadership: The Conservative Promise, accessed [3/4/24](#)]

- **Presidential Appointments Requiring Senate Confirmation “Are Top-Level, Senior Positions That Include The Heads Of Most Major Agencies,” Including Cabinet Secretaries.** “Presidential Appointments Requiring Senate Confirmation (PAS) These are top-level, senior positions that include the heads of most major agencies This includes cabinet secretaries, agency leadership at the Deputy Secretary, Under Secretary, and Assistant Secretary levels, the heads of most independent agencies, ambassadors, and U.S. Attorneys.” [American Constitution Society, accessed [3/12/24](#)]
- **The Attorney General Is The Head Of The Department Of Justice.** “The Judiciary Act of 1789 created the Office of the Attorney General which evolved over the years into the head of the Department of Justice and chief law enforcement officer of the Federal Government.” The U.S. Department of Justice, accessed [3/12/24](#)]

**Von Spakovsky Wrote That The Current FEC Structure “Ensures That There Is Bipartisan Agreement Before Any Action Is Taken And Protects Against The FEC Being Used As A Political Weapon.”** “The current requirement of four votes to authorize an enforcement action, provide an advisory opinion, or issue regulations, ensures that there is bipartisan agreement before any action is taken and protects against the FEC being used as a political weapon.” [Mandate For Leadership: The Conservative Promise, accessed [3/4/24](#)]

**After Growing Frustrated With The FEC Refusing To Enforce Election Laws, FEC Commissioner Ellen Weintraub Said She Would Block Any Effort To “Allow FEC Lawyers To Defend The Government.”** “Fed up with the Federal Election Commission’s gridlock that has given violators of election law a free pass, the agency’s new chair says she won’t allow FEC lawyers to defend the government when the FEC has been sued for not enforcing the law. This drastic step, which one former FEC lawyer called the ‘nuclear option,’ is effectively an effort to sabotage her own agency in order to enforce the law and create more campaign finance disclosure. Ellen Weintraub, a commissioner with the agency since 2002 who became chair in January, has become increasingly frustrated by the FEC’s lack of enforcement of the law, which has led to less disclosure, less transparency, and more dark money within the campaign finance system. According to former FEC



Commissioner Ann Ravel, ‘dysfunction and deadlock’ have reigned supreme at the FEC for the past decade, with the agency ‘failing to enforce campaign finance laws.’” [Mother Jones, [5/1/19](#)]

- **Weintraub’s Decision To Block Any Efforts To Allow FEC Lawyers To Defend The Government Was Described As The “Nuclear Option” In An Attempt “To Enforce The Law And Create More Campaign Finance Disclosure.”** “Fed up with the Federal Election Commission’s gridlock that has given violators of election law a free pass, the agency’s new chair says she won’t allow FEC lawyers to defend the government when the FEC has been sued for not enforcing the law. This drastic step, which one former FEC lawyer called the ‘nuclear option,’ is effectively an effort to sabotage her own agency in order to enforce the law and create more campaign finance disclosure. Ellen Weintraub, a commissioner with the agency since 2002 who became chair in January, has become increasingly frustrated by the FEC’s lack of enforcement of the law, which has led to less disclosure, less transparency, and more dark money within the campaign finance system. According to former FEC Commissioner Ann Ravel, ‘dysfunction and deadlock’ have reigned supreme at the FEC for the past decade, with the agency ‘failing to enforce campaign finance laws.’” [Mother Jones, [5/1/19](#)]

**In 2019, There Were Only Four FEC Commissioners, And Since “Four Votes Are Needed For The Agency To Take Action On Any Matter, Any One Commissioner’s Veto [Could] Grind The FEC To A Halt.”** “The FEC is supposed to have six commissioners at all times, but there are currently only four: two Republicans, one independent, and Weintraub, a Democrat. [...] Because four votes are needed for the agency to take action on any matter, any one commissioner’s veto can grind the FEC to a halt.” [Mother Jones, [5/1/19](#)]

**In His Project 2025 Playbook Section, Von Spakovsky Also Wrote That “The President Should Seriously Consider Recommending That Congress Amend FECA To Remove The Agency’s Independent Litigating Authority And Rely On The Department Of Justice To Handle All Litigation Involving The FEC.”**

**Von Spakovsky Recommended That “The President Should Seriously Consider Recommending That Congress Amend FECA To Remove The Agency’s Independent Litigating Authority And Rely On The Department Of Justice To Handle All Litigation Involving The FEC.”** “As a legislative matter and given this abuse, the President should seriously consider recommending that Congress amend FECA to remove the agency’s independent litigating authority and rely on the Department of Justice to handle all litigation involving the FEC.” [Mandate For Leadership: The Conservative Promise, accessed [3/4/24](#)]

**Von Spakovsky Recommended In The “Multiple Instances Of Existing Statutory Provisions Of FECA And The Accompanying FEC Regulations” That Have “Been Found Unlawful Or Unconstitutional By Federal Court Decisions,” “The President Should Request That The Commissioners On The FEC Prepare Such Guidance” Or If The “FEC Fails To Act, The President Should Direct The Attorney General To Prepare A Guidance Document From The Department Of Justice For The Public.”**

**Von Spakovsky Wrote That There Are “Multiple Instances Of Existing Statutory Provisions Of FECA And The Accompanying FEC Regulations Having Been Found Unlawful Or Unconstitutional By Federal Court Decisions.”** “There are also multiple instances of existing statutory provisions of FECA and the accompanying FEC regulations having been found unlawful or unconstitutional by federal court decisions, yet those statutory provisions remain in the U.S. Code and the implementing regulations remain in the Code of Federal Regulations. In such instances, those regulated by the law, from candidates to the public, have no way of knowing (without engaging in extensive legal research) whether particular statutory provisions and regulations are still applicable to their actions in the political arena. The President should request that the commissioners on the FEC prepare such guidance. In the event that the FEC fails to act, the President should direct the attorney general to prepare a guidance document from the Department of Justice for the public that

outlines all of the FECA statutory provisions and FEC regulations that have been changed, amended, or voided by specific court decisions.” [Mandate For Leadership: The Conservative Promise, accessed [3/5/24](#)]

**Von Spakovsky’s Recommendation On How To Deal With Those Provisions Was That “The President Should Request That The Commissioners On The FEC Prepare Such Guidance” On How To Know “Whether Particular Statutory Provisions And Regulations Are Still Applicable To Their Actions In The Political Arena.”** “There are also multiple instances of existing statutory provisions of FECA and the accompanying FEC regulations having been found unlawful or unconstitutional by federal court decisions, yet those statutory provisions remain in the U.S. Code and the implementing regulations remain in the Code of Federal Regulations. In such instances, those regulated by the law, from candidates to the public, have no way of knowing (without engaging in extensive legal research) whether particular statutory provisions and regulations are still applicable to their actions in the political arena. The President should request that the commissioners on the FEC prepare such guidance. In the event that the FEC fails to act, the President should direct the attorney general to prepare a guidance document from the Department of Justice for the public that outlines all of the FECA statutory provisions and FEC regulations that have been changed, amended, or voided by specific court decisions.” [Mandate For Leadership: The Conservative Promise, accessed [3/5/24](#)]

**Von Spakovsky Added That If In These Instances The “FEC Fails To Act, The President Should Direct The Attorney General To Prepare A Guidance Document From The Department Of Justice For The Public.”** “There are also multiple instances of existing statutory provisions of FECA and the accompanying FEC regulations having been found unlawful or unconstitutional by federal court decisions, yet those statutory provisions remain in the U.S. Code and the implementing regulations remain in the Code of Federal Regulations. In such instances, those regulated by the law, from candidates to the public, have no way of knowing (without engaging in extensive legal research) whether particular statutory provisions and regulations are still applicable to their actions in the political arena. The President should request that the commissioners on the FEC prepare such guidance. In the event that the FEC fails to act, the President should direct the attorney general to prepare a guidance document from the Department of Justice for the public that outlines all of the FECA statutory provisions and FEC regulations that have been changed, amended, or voided by specific court decisions.” [Mandate For Leadership: The Conservative Promise, accessed [3/5/24](#)]

**Von Spakovsky Wrote That The President “Must Not Construe Ambiguous Provisions...In A Way That Infringes On Protected First Amendment Activity.”** “Former Federal Election Commissioner Hans von Spakovsky writes in Chapter 29 that while ‘the authority of the President over the actions of’ the Federal Election Commission ‘is extremely limited,’ the President “must ensure that the [Justice Department], just like the FEC, is directed to only prosecute clear violations” of the Federal Election Campaign Act. ‘The department must not construe ambiguous provisions...in a way that infringes on protected First Amendment activity,’ he writes.” [Mandate For Leadership: The Conservative Promise, accessed [3/5/24](#)]

**Von Spakovsky Recommended Raising Campaign “Contribution Limits And Index Reporting Requirements To Inflation,” Which Critics Of Similar Efforts On The State Level Have Said Would Unleash Billionaires And “Disproportionately Benefit Incumbents” With Established Wealthy Donor Connections.**

**Von Spakovsky Recommended Raising Campaign “Contribution Limits And Index Reporting Requirements To Inflation.”** “Raise contribution limits and index reporting requirements to inflation. Contribution limits should generally be much higher, as they hamstring candidates and parties while serving no practical anticorruption purpose. And a wide range of reporting requirements have not been indexed to inflation, clogging the public record and the FEC’s internal processes with small-dollar information of little use to the public.” [Mandate For Leadership: The Conservative Promise, accessed [3/6/24](#)]

**Von Spakovsky Has An Abysmal Record On Voting Rights — Spending Much Of His Career Working To Limit Access To The Ballot Box — As He Has Testified In Support Of Increased Proof Of Citizenship Requirements For Voter Registration, Voter ID Laws, And Pushing The “Once-Fringe” Theory Of Widespread Voter Fraud.**

**Von Spakovsky Worked With The American Legislative Exchange Council, Appearing On A Panel At The Group’s 2019 Annual Meeting Called “How To Survive Redistricting;” He And The Three Other Members Of The Panel Have Been Called “Architects And Defenders Of Some Of The Most Notorious Gerrymanders And Voter Suppression Plans Of This Decade.”**

**Von Spakovsky Worked With The American Legislative Exchange Council, Appearing On A Panel At The Group’s 2019 Annual Meeting Called “How to Survive Redistricting.”** “Luxury cabanas atop Austin’s JW Marriott kept state legislators cool poolside as August-in-Texas temperatures soared above 103 degrees during each day of the American Legislative Exchange Council’s 2019 annual meeting. [...] Downstairs, meanwhile, five of the GOP’s most seasoned redistricting minds and über-lawyers would teach them the finer points of tilting maps and drawing districts that would allow them to retain such spoils for another decade. Slate has obtained an exclusive audio recording of the closed-door panel called ‘How to Survive Redistricting,’ moderated by influential Republican lawyer Cieta Mitchell. The panel’s four experts—Hans von Spakovsky of the Heritage Foundation, North Carolina election lawyer Thomas Farr, former Georgia Rep. Lynn Westmoreland, and Texas state Rep. Phil King—are among the architects and defenders of some of the most notorious gerrymanders and voter suppression plans of this decade.” [Slate, [10/2/19](#)]

- **Von Spakovsky Was One Of Four Experts On The Panel, All Of Whom “Are Among The Architects And Defenders Of Some Of The Most Notorious Gerrymanders And Voter Suppression Plans Of This Decade.”** “Luxury cabanas atop Austin’s JW Marriott kept state legislators cool poolside as August-in-Texas temperatures soared above 103 degrees during each day of the American Legislative Exchange Council’s 2019 annual meeting. [...] Downstairs, meanwhile, five of the GOP’s most seasoned redistricting minds and über-lawyers would teach them the finer points of tilting maps and drawing districts that would allow them to retain such spoils for another decade. Slate has obtained an exclusive audio recording of the closed-door panel called ‘How to Survive Redistricting,’ moderated by influential Republican lawyer Cieta Mitchell. The panel’s four experts—Hans von Spakovsky of the Heritage Foundation, North Carolina election lawyer Thomas Farr, former Georgia Rep. Lynn Westmoreland, and Texas state Rep. Phil King—are among the architects and defenders of some of the most notorious gerrymanders and voter suppression plans of this decade.” [Slate, [10/2/19](#)]

**Hans Von Spakovsky, A Director Of The Public Interest Legal Foundation And Manager Of The Heritage Foundation’s Election Law Reform Initiative, Testified In Support Of Voter Restrictions At A May 2023 Congressional Hearing On The ACE Act.**

**May 2023: Von Spakovsky Appeared As An Expert Witness At A Committee On House Administration Hearing On The ACE Act.** “Committee on House Administration Chairman Bryan Steil (WI-01) hosted a full committee hearing entitled, ‘American Confidence in Elections: State Tools to Promote Voter Confidence.’ This hearing was the first in a series leading up to the introduction of the American Confidence in Elections (ACE) Act, the federalist approach bill to equip states with key election integrity tools. [...] Expert witnesses included West Virginia Secretary of State Mac Warner, The Heritage Foundation’s Senior Legal Fellow Hans von Spakovsky, Election Assistance Commissioner Donald Palmer, and Election Transparency Initiative’s National Chairman Ken Cuccinelli.” [Committee on House Administration, [5/1/23](#)]

- **Hans Von Spakovsky Is A Senior Legal Fellow At The Heritage Foundation’s Legal And Judicial Center, And Leads The Heritage Foundation’s Election Law Division.** [The Heritage Foundation, accessed [3/4/24](#)]
- **Von Spakovsky Is Also A Director At The Public Interest Legal Foundation.** [The Heritage Foundation, accessed [3/4/24](#)]

**During The Hearing, Spakovsky Testified In Support Of Increased Proof Of Citizenship Requirements For Voter Registration.** “Mr. von Spakovsky: ‘The social security’s master death index is a requirement states ought to be able to use it easily freely and frequently, without being charged by the federal government. The DHS databases need to be restructured and made easy to use by election officials so that they can use that also to check on citizenship status. States need to be allowed to require proof of citizenship when people register to vote in exactly the same manner that all employers in the country have to fill out the federal I9 form to show that a person they’re hiring is, like I said, a U.S. citizen or is an alien who’s here legally and has a work permit.’” [Committee on House Administration, [5/1/23](#)]

**During The Hearing, Von Spakovsky Defended Voter Identification Requirements, Claiming “Voter ID Has Absolutely No Effect On Individuals.”** “During the hearing, von Spakovsky pushed back on the myth that requiring voter ID suppresses voting. He noted a report two years ago by the National Bureau of Economic Research that found voter ID requirements had no negative impact on turnout based on 10 years of data comparing states with voter ID laws and states with no such laws. ‘The conclusion was that voter ID has absolutely no effect on individuals; it doesn’t matter what race they are, it doesn’t matter what gender, it doesn’t matter what socio-economic group,’ von Spakovsky said.” [The Daily Signal, [4/27/23](#)]

**The Public Interest Legal Foundation (PILF) Has Been Central In Pushing The “Once-Fringe” Theory Of Widespread Voter Fraud Over The Last Decade, Filing Lawsuits Against Local Election Rules And Fueling Trump’s Falsehoods About The 2020 Election.**

**The Public Interest Legal Foundation (PILF) Is Part Of A Network Of Conservative Lawyers That Have Pushed The “Once-Fringe” Theory Of Widespread Voter Fraud In The U.S., Filing Dozens Of Lawsuits Over Election Rules Since 2012 And Fueling Trump’s Objections To The 2020 Election Results.** “In making these claims, Trump has seized upon the idea that U.S. elections are vulnerable to rampant fraud. That once-fringe theory has become a staple of Republican politics, due largely to the efforts of a small network of lawyers who have promoted it for two decades, funded by right-wing foundations. [...] Four nonprofits run by or linked to this network of lawyers – the Public Interest Legal Foundation, the American Constitutional Rights Union, Judicial Watch and True the Vote - have been involved in at least 61 lawsuits over election rules since 2012, according to a Reuters examination. More than half have been initiated since Trump took office in 2017, including 11 cases concerning absentee or mail-in voting.” [Reuters, [9/9/20](#)]

- **Trump Attorney General William Barr Said That The U.S. Justice Department “Uncovered No Evidence Of Widespread Voter Fraud” In The 2020 Election.** “Disputing President Donald Trump’s persistent, baseless claims, Attorney General William Barr declared Tuesday the U.S. Justice Department has uncovered no evidence of widespread voter fraud that could change the outcome of the 2020 election.” [Associated Press, [6/28/22](#)]

**The Indiana-Based PILF “Repeatedly Sued Election Officials For Not Purging Voters Aggressively Enough” In Cities And Counties Across The U.S.** “The Public Interest Legal Foundation, a group that has repeatedly sued election officials for not purging voters aggressively enough, today asked a judge to dismiss its own lawsuit against the City of Detroit. [...] The Indiana-based PILF has brought multiple purge suits against cities and counties across the country. Indeed, the court recognized that ‘the same plaintiff has initiated or is in the process of initiating multiple lawsuits in various courts around the state raising essentially identical claims attempting to coerce municipalities to purge their voter rolls.’” [Brennan Center for Justice, [6/30/20](#)]



**During His Tenure At The DOJ, Von Spakovsky “Used Every Opportunity He Had [...] To Make It Difficult For Voters — Poor, Minority And Democratic — To Go To The Polls,” Including Efforts To Institute Voter ID Laws And Purge Voter Rolls.**

**Von Spakovsky Previously Worked At The Department Of Justice As Counsel To The Assistant Attorney General For Civil Rights, Using “Every Opportunity He Had [...] To Make It Difficult For Voters — Poor, Minority And Democratic — To Go To The Polls,” Prompting “More Than Half Of The Career Lawyers In The Voting Section Left In Protest.”**

**Von Spakovsky Previously Worked At The Department Of Justice As Counsel To The Assistant Attorney General For Civil Rights.** “Previously, von Spakovsky worked at the Justice Department as Counsel to the Assistant Attorney General for Civil Rights, providing expertise in enforcing the Voting Rights Act and the Help America Vote Act of 2002.” [The Heritage Foundation, accessed [3/7/24](#)]

**During Von Spakovsky’s Over Four-Year Tenure At The DOJ, He “Used Every Opportunity He Had [...] To Make It Difficult For Voters -- Poor, Minority And Democratic -- To Go To The Polls.** “As his critics see it, Hans A. von Spakovsky used every opportunity he had over four years in the Justice Department to make it difficult for voters -- poor, minority and Democratic -- to go to the polls. During his tenure, more than half of the career lawyers in the voting section left in protest.” [Washington Post, [6/8/07](#)]

**While He Worked At The DOJ, “More Than Half Of The Career Lawyers In The Voting Section Left In Protest.”** “As his critics see it, Hans A. von Spakovsky used every opportunity he had over four years in the Justice Department to make it difficult for voters -- poor, minority and Democratic -- to go to the polls. During his tenure, more than half of the career lawyers in the voting section left in protest.” [Washington Post, [6/8/07](#)]

**Congressman John Lewis, Who “Was Beaten By Police While Demonstrating In Support Of Civil-Rights Legislation, Including The Voting Rights Act,” Said Of Von Spakovsky That “Over The Years He’s Been Hellbent To Make It More Difficult—Always, Always—For People To Vote.”**

**Congressman John Lewis, Who “Was Beaten By Police While Demonstrating In Support Of Civil-Rights Legislation, Including The Voting Rights Act” In The 1960s, Said Of Von Spakovsky That “Over The Years He’s Been Hellbent To Make It More Difficult—Always, Always—For People To Vote.”**

“Congressman John Lewis, the Democrat from Georgia, says of recent efforts to tighten voting requirements, ‘I thought we’d passed this long ago. But it seems we must fight this fight over and over.’ In the nineteen-sixties, Lewis was beaten by police while demonstrating in support of civil-rights legislation, including the Voting Rights Act. He said of von Spakovsky, ‘He’s been the moving force behind photo I.D.s. I don’t know if it’s something in the water he’s been drinking . . . but over the years he’s been hellbent to make it more difficult—always, always—for people to vote. It’s like he goes to bed dreaming about this, and gets up in the morning wondering, What can I do today to make it more difficult for people to vote? When you pull back the covers, peel back the onion, he’s the one who’s gotten the Republican legislatures, and the Republican Party, to go along with this—even though there is no voter fraud to speak of. He’s trying to create a cure where there is no sickness.” [The New Yorker, [10/22/12](#)]

**In 2005, Von Spakovsky Overrode Career Staff And Approved “A Georgia Law Requiring That People Present Photo Identification To Vote,” Which Career Lawyers Thought “Would Discriminate Against Black Voters;” While Advocating For The Law Within The DOJ, Von Spakovsky Anonymously Published An Article Advocating For Similar Voter ID Laws.**

**In A 2005 Move That Overrode Career Staff, Von Spakovsky Approved “A Georgia Law Requiring That People Present Photo Identification To Vote,” Which Career Lawyers Thought “Would Discriminate Against Black Voters.”** “The elements of that record that voting rights activists have found most objectionable include von Spakovsky’s decision in 2005 to override the career staff in approving a Georgia law requiring that people present photo identification to vote. Career lawyers thought the provision would discriminate against black voters.” [Washington Post, [6/8/07](#)]

**While Von Spakovsky Was Advocating Within The DOJ For The Georgia Law, He Had An Article Published Under A Pseudonym Advocating For Similar Voter ID Laws.** “During the Bush administration, von Spakovsky was a special counsel at the Justice Department’s Civil Rights Division, where he played a key role in the department’s approval of a 2005 voter ID law from Georgia—among the first of its kind—over objections from career department lawyers, who said it was discriminatory. While advocating internally for the law, von Spakovsky published a law review article under the pseudonym ‘Publius’ praising voter ID laws, in a move that experts said violated Justice Department ethics guidelines.” [Mother Jones, [5/13/21](#)]

**In 2004, During Von Spakovsky’s DOJ Tenure, Two Voter-Advocacy Groups Had A Meeting With Justice Department Officials Where They Presented Evidence That One Section Of The National Voter Registration Act That “Requires States To Make Voter Registration Available At Social-Service Agencies” Wasn’t Being Enforced; Instead Of Addressing That Issue, A Few Months Later, Von Spakovsky Directed The Office To Enforce A Part Of The Law That Focused More On Taking Names Off The Voter Lists.**

**In 2004, During Von Spakovsky’s DOJ Tenure, Two Voter-Advocacy Groups Had A Meeting With Justice Department Officials Where They Presented Evidence That One Section Of The National Voter Registration Act (NVRA) — Or Motor-Voter Law — Wasn’t Being Enforced.** “Voting-rights advocates say that under former Attorney General Alberto Gonzales, the Justice Department pursued a partisan effort to limit the number of voters, while ignoring measures designed to get more voters on the rolls. Agency officials deny this is the case and point to recent efforts in their defense. [...] Joe Rich, a former head of the Civil Rights Division’s voting section, recalls a 2004 meeting that he and other Justice Department officials had with two voter-advocacy groups, ProjectVote and Demos. The advocates had evidence that one section of the National Voter Registration Act (NVRA) — or motor-voter law — wasn’t being enforced. That section requires states to make voter registration available at social-service agencies to encourage voter registration among low-income and disadvantaged Americans. [...] Rich says that a few months later, Von Spakovsky directed the office to push another part of the motor-voter law — an effort that focused more on taking names off the lists, rather than putting them on.” [NPR, [10/11/07](#)]

**The Section Of Law “Requires States To Make Voter Registration Available At Social-Service Agencies To Encourage Voter Registration Among Low-Income And Disadvantaged Americans.”** “Voting-rights advocates say that under former Attorney General Alberto Gonzales, the Justice Department pursued a partisan effort to limit the number of voters, while ignoring measures designed to get more voters on the rolls. Agency officials deny this is the case and point to recent efforts in their defense. [...] Joe Rich, a former head of the Civil Rights Division’s voting section, recalls a 2004 meeting that he and other Justice Department officials had with two voter-advocacy groups, ProjectVote and Demos. The advocates had evidence that one section of the National Voter Registration Act (NVRA) — or motor-voter law — wasn’t being enforced. That section requires states to make voter registration available at social-service agencies to encourage voter registration among low-income and disadvantaged Americans. [...] Rich says that a few months later, Von Spakovsky

directed the office to push another part of the motor-voter law — an effort that focused more on taking names off the lists, rather than putting them on.” [NPR, [10/11/07](#)]

**A Few Months After The Meeting, Instead Of Addressing The Problem Brought To Light By The Two Voter-Advocacy Groups, Von Spakovsky Instead “Directed The Office To Push Another Part Of The Motor-Voter Law — An Effort That Focused More On Taking Names Off The Lists, Rather Than Putting Them On.”** “Voting-rights advocates say that under former Attorney General Alberto Gonzales, the Justice Department pursued a partisan effort to limit the number of voters, while ignoring measures designed to get more voters on the rolls. Agency officials deny this is the case and point to recent efforts in their defense. [...] Joe Rich, a former head of the Civil Rights Division's voting section, recalls a 2004 meeting that he and other Justice Department officials had with two voter-advocacy groups, ProjectVote and Demos. The advocates had evidence that one section of the National Voter Registration Act (NVRA) — or motor-voter law — wasn't being enforced. That section requires states to make voter registration available at social-service agencies to encourage voter registration among low-income and disadvantaged Americans. [...] Rich says that a few months later, Von Spakovsky directed the office to push another part of the motor-voter law — an effort that focused more on taking names off the lists, rather than putting them on.” [NPR, [10/11/07](#)]

**Von Spakovsky Is A Director At The Public Interest Legal Foundation (PILF)—Which Has Been Central In Pushing “Once-Fringe” Voter Fraud Theories And Is Closely Tied To The Leo Network Through Current And Former Board Members, Corporate Officers, And Funding From Leo-Tied Entities.**

**Hans Von Spakovsky, A Director Of The Public Interest Legal Foundation And Manager Of The Heritage Foundation’s Election Law Reform Initiative, Testified In Support Of Voter Restrictions At A May 2023 Congressional Hearing On The ACE Act.**

**Hans Von Spakovsky Is A Director Of The Public Interest Legal Foundation And A Senior Legal Fellow At The Heritage Foundation, Serving As Manager Of Its Election Law Reform Initiative:**



**HANS VON SPAKOVSKY**  
*Director*

[Public Interest Legal Foundation, accessed [03/13/24](#)]

- **Hans von Spakovsky Is A Senior Legal Fellow At The Heritage Foundation And Manager Of Its Election Law Reform Initiative.** “Hans von Spakovsky is an authority on a wide range of issues—including civil rights, civil justice, the First Amendment, immigration, the rule of law, and

government reform—as a Senior Legal Fellow in The Heritage Foundation’s Edwin Meese III Center for Legal and Judicial Studies. As manager of the think tank’s Election Law Reform Initiative, von Spakovsky also studies and writes about campaign finance restrictions, voter fraud and voter ID, enforcement of federal voting rights laws, administration of elections and voting equipment standards.” [The Heritage Foundation, accessed [07/12/23](#)]

## **The Public Interest Legal Foundation (PILF) Has Been Central In Pushing The “Once-Fringe” Theory Of Widespread Voter Fraud Over The Last Decade, Filing Lawsuits Against Local Election Rules And Fueling Trump’s Falsehoods About The 2020 Election.**

**The Public Interest Legal Foundation (PILF) Is Part Of A Network Of Conservative Lawyers That Have Pushed The “Once-Fringe” Theory Of Widespread Voter Fraud In The U.S., Filing Dozens Of Lawsuits Over Election Rules Since 2012 And Fueling Trump’s Objections To The 2020 Election Results.** “In making these claims, Trump has seized upon the idea that U.S. elections are vulnerable to rampant fraud. That once-fringe theory has become a staple of Republican politics, due largely to the efforts of a small network of lawyers who have promoted it for two decades, funded by right-wing foundations. [...] Four nonprofits run by or linked to this network of lawyers – the Public Interest Legal Foundation, the American Constitutional Rights Union, Judicial Watch and True the Vote - have been involved in at least 61 lawsuits over election rules since 2012, according to a Reuters examination. More than half have been initiated since Trump took office in 2017, including 11 cases concerning absentee or mail-in voting.” [Reuters, [09/09/20](#)]

- **Trump Attorney General William Barr Said That The U.S. Justice Department “Uncovered No Evidence Of Widespread Voter Fraud” In The 2020 Election.** “Disputing President Donald Trump’s persistent, baseless claims, Attorney General William Barr declared Tuesday the U.S. Justice Department has uncovered no evidence of widespread voter fraud that could change the outcome of the 2020 election.” [Associated Press, [06/28/22](#)]

**The Indiana-Based PILF “Repeatedly Sued Election Officials For Not Purging Voters Aggressively Enough” In Cities And Counties Across The U.S.** “The Public Interest Legal Foundation, a group that has repeatedly sued election officials for not purging voters aggressively enough, today asked a judge to dismiss its own lawsuit against the City of Detroit. [...] The Indiana-based PILF has brought multiple purge suits against cities and counties across the country. Indeed, the court recognized that ‘the same plaintiff has initiated or is in the process of initiating multiple lawsuits in various courts around the state raising essentially identical claims attempting to coerce municipalities to purge their voter rolls.’” [Brennan Center for Justice, [06/30/20](#)]


## **Neil Corkery—A “Close” Leo Ally “At The Center Of Leo’s Dark Money Network”—Appeared As PILF’s Chief Financial Officer In A 2021 Disclosure, Was Listed As Its Treasurer And As A Director In 2019.**

**Neil And Ann Corkery Are “Close Allies” Of Leonard Leo Who Have Served As Board Members Or Treasurers For His Groups.** “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](#)]

**Neil And Ann Corkery Are “Anti-Choice/Anti-Gay Activists At The Center Of Leo’s Dark Money Network,” According To Center For Media And Democracy President Lisa Graves.** “Testimony of Lisa Graves President of the Center for Media and Democracy [...] According to FEC filings, donors to Collins at that protested event included C. Boyden Gray (the former White House Counsel, who previously launched and nurtured dark money groups around judicial nominations, like the Committee for Justice) and Neil and Ann Corkery, anti-choice/anti-gay activists at the center of Leo’s dark money network.” [U.S. Senate Committee on the Judiciary, [03/10/21](#)]



In July 2021, Neil Corkery Was Identified As The Public Interest Legal Foundation's Chief Financial Officer In Its Annual Financial Report Form For The North Carolina Secretary Of State:

Name: <b>Neil Corkery</b>	Signature 
Title: <b>CFO</b>	

[...]

55. Report Completion and Signature Date:	07/21/2021
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[Public Interest Legal Foundation Annual Financial Report Form, North Carolina Department of the Secretary of State, [2020](#)]

Neil Corkery Was The Public Interest Legal Foundation's Treasurer And A Director In 2019:

**(5) Neil Corkery**  
**Treasurer, Director**

[Public Interest Legal Foundation IRS Form 990, [2019](#)]

- Neil Corkery Does Not Appear As Treasurer In The Public Interest Legal Foundation's 2020 IRS Filing. [Public Interest Legal Foundation IRS Form 990, [2020](#)]

**Shawna Powell, Who Has Appears As PILF's Secretary In Its Three Most Recent IRS Filings And Appears To Work For The Group Full-Time, Has Also Been The Tax Preparer For Leo's Marble Freedom Trust.**

Shawna L. Powell Has Been Identified As The Public Interest Legal Foundation's Secretary In The Group's Three Most-Recently Available IRS Filings:

**(6) Shawna L. Powell**  
**Secretary**

[Public Interest Legal Foundation IRS Form 990, [2020](#)]

**(7) Shawna L Powell**  
**Secretary**

[Public Interest Legal Foundation IRS Form 990, [2019](#)]

**(8) Shawna L Powell**  
**Secretary**

[Public Interest Legal Foundation IRS Form 990, [2018](#)]

According To The Public Interest Legal Foundation's 2020 IRS Filing, Shawna L. Powell Works An Average Of 40 Hours Per Week, Suggesting Her Role At The Organization Is Her Full-Time Job:

(6) Shawna L. Powell Secretary	40						108,471
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[Public Interest Legal Foundation IRS Form 990, [2020](#)]

**Shawna Powell Was The Marble Freedom Trust’s Paid Tax Preparer For Its 2020 IRS Filing:**

<b>Paid Preparer Use Only</b>	Print/Type preparer’s name <b>Shawna Powell</b>	Preparer’s signature
	Firm’s name ▶ <b>Shawna Powell</b>	
	Firm’s address ▶ <b>9100 Purdue Rd Ste 115, Indianapolis, IN 46204</b>	

[Marble Freedom Trust IRS Form 990, [2020](#)]

- **Leonard Leo Founded Marble Freedom Trust.** “Seid, who has spent tens of millions of dollars funding conservative and libertarian organisations, donated an entire company last year to a newly founded political advocacy group run by Leo, the Marble Freedom Trust.” [The Guardian, [01/31/23](#)]
- **Leonard Leo Was Identified As The Marble Freedom Trust’s Trustee And Chairman In Its 2020 IRS Filing:**

Leonard Leo  
Trustee and Chairman

- [Marble Freedom Trust IRS Form 990, [2020](#)]

**PILF Has Received Funding From The Leo-Tied 85 Fund, Formerly Known As The Judicial Education Project.**

**In 2020, The Public Interest Legal Foundation Received \$400,000 From The 85 Fund:**

(16) Public Interest Legal Foundation 32 E. Washington St., Room 1675 Indianapolis	45-4355641	501 c 3	400,000
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[The 85 Fund IRS Form 990, [2020](#)]

**The 85 Fund, Formerly Known As The Judicial Education Project, Is Part Of Leonard Leo’s Network Of Organizations.** “Around the same time, two other groups that he had worked with on confirmation fights — the Judicial Education Project and a group that had been known as the Judicial Crisis Network — changed their names to the 85 Fund and the Concord Fund. The change seemed to reflect a broadening of their focus beyond the courts. Mr. Leo does not have an official role in the 85 Fund or the Concord Fund, but since the beginning of 2016, they paid more than \$7.4 million to the BH Group, and more than \$41 million to CRC.” [The New York Times, [10/12/22](#)]

**John Eastman—Trump’s Election Lawyer Who Is Facing Disbarment In California For His Role In Trying To Overturn The 2020 Election—Was On PILF’s Board Of Directors As Recently As September 2022, Has Been Featured At Over 110 Events At The Leo-Tied Federalist Society, And Hosted Leo-Tied Judicial Crisis Network’s Carrie Severino At A Claremont Institute Event.**

**Trump Election Attorney John Eastman Has Faced Disbarment From The State Of California And 11 Related Disciplinary Charges Over His “Role In Trying To Overturn The Results Of The 2020 Election,” Including “False And Misleading Statements” He Made At The Rally Preceding The January 6th Insurrection.** “The State Bar of California intends to seek the disbarment of former president Donald Trump’s election attorney John Eastman for his role in trying to overturn the results of the 2020 election. In a statement, the office of California bar Chief Trial Counsel George Cardona said Eastman faces 11 disciplinary charges, all arising from allegations that he was behind Trump’s plan to obstruct the count of electoral votes. Per the

statement, Eastman is accused of making false and misleading statements regarding alleged election fraud — including claims he made at a rally at the Ellipse outside the White House that preceded the deadly riot at the U.S. Capitol on Jan. 6, 2021.” [The Washington Post, [01/26/23](#)]

### **Dr. John C. Eastman Was On The Public Interest Legal Foundation’s Board Of Directors As Of September 19, 2022:**

**DR. JOHN C. EASTMAN**  
*Director*

[Public Interest Legal Foundation via Archive.org, captured 09/19/22, accessed [01/30/23](#)]

- **Eastman Was No Longer Publicly Listed On PILF’s Board Of Directors, As Of January 31, 2023.** [Public Interest Legal Foundation, accessed [01/31/23](#)]

**John Eastman Has Appeared At Over 110 Events At Leonard Leo’s Federalist Society Since 2003.** [The Federalist Society, accessed [01/30/23](#)]

**2018: John Eastman, Founding Director Of The Conservative Claremont Institute’s Center For Constitutional Jurisprudence, Hosted Judicial Crisis Network Chief Counsel And Policy Director Carrie Severino.** “John Eastman is Founding Director of the Claremont Institute’s Center for Constitutional Jurisprudence, and currently serves as the Henry Salvatori Professor of Law & Community Service at Chapman University’s Dale E. Fowler School of Law. He is also a Senior Fellow of the Claremont Institute. [...] Carrie Severino is chief counsel and policy director of the Judicial Crisis Network.” [The American Mind, [06/29/18](#)]

- **The Claremont Institute Is A “A Right-Wing Think Tank In California That Has, In Recent Years, Become Increasingly Influential In Republican Circles.”** “The American Mind is an online magazine of the Claremont Institute, a right-wing think tank in California that has, in recent years, become increasingly influential in Republican circles.” [The New York Times, [08/03/22](#)]

**Leonard Leo Gave \$500 To John Eastman’s 2010 Campaign For California Attorney General.** [The Accountability Project, [03/23/10](#)]

**Cleta Mitchell—“One Of The Key Figures” In The Scheme To Overturn The Election Who Advised Trump In His Notorious Call With Georgia’s Secretary Of State—Is PILF’s Chairman, Has Served Alongside Leo On The Far-Right Council For National Policy’s Board Of Governors, And Now Leads A FreedomWorks “Election Integrity” Effort That Has Indirectly Benefited From Leo’s Marble Freedom Trust.**

**Cleta Mitchell Was “One Of The Key Figures” In Trump’s Scheme To Overturn The 2020 Election And Was Among “A Cadre Of Republican Lawyers Who Frantically Compiled Unsubstantiated Accusations, Debunked Claims And An Array Of Confusing And Inconclusive Eyewitness Reports.”** “In a hotel conference center outside Harrisburg, Pa., Cleta Mitchell, one of the key figures in a failed scheme to overturn Donald J. Trump’s defeat, was leading a seminar on ‘election integrity.’ [...] In the days after the 2020 election, Ms. Mitchell was among a cadre of Republican lawyers who frantically compiled unsubstantiated accusations, debunked claims and an array of confusing and inconclusive eyewitness reports to build the case that the election was marred by fraud.” [The New York Times, [05/30/22](#)]

**January 2021: Cleta Mitchell Resigned From Her Partnership At Law Firm Foley And Lardner Amid Criticism Of Her Role Advising Then-President Donald Trump For A Phone Call Where He Pressured Georgia’s Secretary Of State To Overturn The 2020 Election.** “Republican attorney Cleta Mitchell resigned from her law firm Tuesday after advising President Trump on a phone call with Georgia state officials during

which he urged them to find evidence that could overturn the state's November election results. Mitchell resigned her partnership from the Washington, D.C., office of Foley & Lardner following criticism of her involvement in the Jan. 2 phone call between Trump and Georgia officials.” [NPR, [01/06/21](#)]

**Cleta Mitchell Was The Chairman Of The Public Interest Legal Foundation’s Board Of Directors As Of January 30, 2023.** [Public Interest Legal Foundation, accessed [01/30/23](#)]

**Leonard Leo And Cleta Mitchell Were Members Of The Secretive Far-Right Council For National Policy As Of January 2022—Leo And Mitchell Were Both On The Group’s Board Of Governors As Of Early 2022.** “CNP members range from the leaders of the Heritage Foundation and the Federalist Society, to the Southern Poverty Law Center designated anti-LGBTQ hate groups Family Research Council and Alliance Defending Freedom. The heads of major foundations on the right, including those of Donors Trust and the Bradley Foundation, are also members. [...] The new membership list was shared by a member of CNP in January 2022 and obtained by Documented. Although the list does not include a specific date, metadata of the file shows it was created on January 19, 2022.” [Documented, [03/18/22](#)]

- **Leonard Leo Was On The Council For National Policy’s Board Of Governors As Of Early 2022.** “Leonard Leo [...] He is a member of CNP’s Board of Governors.” [Documented, [03/18/22](#)]
- **Cleta Mitchell Was On The Council For National Policy’s Board Of Governors As Of Early 2022.** “Cleta Mitchell [...] She is a member of CNP’s Board of Governors.” [Documented, [03/18/22](#)]
- **The Council For National Policy Is Highly Secretive And The Group Threatens Expulsion For Any Members Who Reveal Its Membership List.** “The membership list of the Council for National Policy is supposed to be a prized secret. A 2016 internal CNP policy obtained by Documented threatens expulsion for anyone that breaks the rules and names names. So anytime a list like this comes out, it’s a big deal for those trying to follow what is happening in right-wing circles.” [Documented, [03/18/22](#)]

**Cleta Mitchell Chairs The Election Protection Initiative, An “Election Integrity” Effort Launched By FreedomWorks, A Conservative Group Most Known For Backing The Tea Party Movement.** “No issue is more important to the conservative movement right now than election integrity. Never again should America witness last-minute changes to the rules by courts, tens of millions of late-arriving mail-in ballots, and an ignorance of the science that voting in person is safe. [...] That’s why FreedomWorks has launched the Election Protection Initiative: to put grassroots at the heart of the elections process. With renowned attorney Cleta Mitchell as our chair, we will restore confidence in our elections by advocating for state-level election integrity legislation; registering new voters; and involving our activists directly as elections officers.” [Election Protection Initiative, accessed [01/30/23](#)]

- **Freedomworks Is “A Conservative-Leaning Organization Best Known For Its Support Of The Tea Party Movement.”** “FreedomWorks, a conservative-leaning organization best known for its support of the Tea Party movement and its longtime opposition to government bailouts, has applied for a Small Business Administration loan through the Paycheck Protection Program, Congress’s emergency response to the economic downturn.” [Vox, [04/24/20](#)]

**In 2020, FreedomWorks Received About \$1.1 Million From Donors Trust For Its Keep Elections Great Project And A “Save Our Country” Initiative.** “FreedomWorks received roughly \$1.1 million in Donor Trust money last year, including for the Keep Elections Great Project and an initiative identified on the IRS filing as ‘Save Our Country.’” [The Daily Beast, [11/22/21](#)]

**In 2020, Marble Freedom Trust—Founded By Leonard Leo, Who Is The Group’s Trustee And Chairman— Gave \$41,100,000 To Donors Trust:**



<b>Name and address</b>	Donors Trust Inc 1800 Diagonal Ste 280 Alexandria, VA 22314	52-2166327	41,100,000
<b>IRC code section</b>	501(c)(3)		
<b>Method of valuation</b>			
<b>Desc. of Non-Cash Asst.</b>			
<b>Purpose of grant</b>	General Operating		

[Marble Freedom Trust IRS Form 990, [2020](#)]

- **Leonard Leo Founded The Marble Freedom Trust.** “Seid, who has spent tens of millions of dollars funding conservative and libertarian organisations, donated an entire company last year to a newly founded political advocacy group run by Leo, the Marble Freedom Trust.” [The Guardian, [01/31/23](#)]
- **Leonard Leo Was Identified As The Marble Freedom Trust’s Trustee And Chairman In Its 2020 IRS Filing:**

Leonard Leo  
Trustee and Chairman

[Marble Freedom Trust IRS Form 990, [2020](#)]