

**From:** [Andrew Pardue](#)  
**To:** [CELA](#)  
**Cc:** [Matthew Petersen](#); [Steve Roberts](#)  
**Subject:** MUR 7964 (White Coat Waste PAC, et al.) Response  
**Date:** Friday, April 15, 2022 2:09:57 PM  
**Attachments:** [MUR 7964 \(White Coat Waste PAC, et al.\) Response.pdf](#)

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Mr. Keeyes:

Please find attached the response of White Coat Waste PAC, White Coat Waste Project, Anthony Bellotti, and Justin Goodman in MUR 7964. Please confirm receipt of this response at your earliest convenience.

Sincerely,

**Andrew Pardue**

**Holtzman Vogel Baran Torchinsky & Josefiak PLLC**

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# Holtzman Vogel

HOLTZMAN VOGEL BARAN TORCHINSKY & JOSEFIAK PLLC

April 14, 2022

Roy Q. Luckett  
Acting Assistant General Counsel  
Complaints Examination &  
Legal Administration  
Federal Election Commission  
1050 First Street, NE  
Washington, DC 20463

***Re: Response of The White Coat Waste Project, Inc.; White Coat Waste PAC; Anthony Bellotti; and Justin Goodman in MUR 7964***

Dear Mr. Luckett:

This response is submitted by the undersigned counsel on behalf of the White Coat Waste Project, Inc. (the “Project”); White Coat Waste PAC (the “PAC”); Anthony Bellotti; and Justin Goodman (collectively, “Respondents”) in connection with Matter Under Review (“MUR”) 7964. The Complaint in this matter, filed on or about February 24, 2022, alleges—on the basis of scanty evidence—that the PAC has unlawfully held itself out as a nonconnected PAC when it should be considered a separate segregated fund of the Project, which is a Section 501(c)(3) nonprofit organization.<sup>1</sup> As shown below, the Complaint fails to present sufficient facts to establish a violation of the Federal Election Campaign Act of 1971, as amended (“FECA” or the “Act”), and moreover, inaccurately describes the relationship between the Project and the PAC. Because the PAC is properly categorized as a nonconnected PAC, the Federal Election Commission (“FEC” or the “Commission”) should reject the Complaint’s allegations and close the file in this matter.

## I. FACTUAL BACKGROUND

Established in 2013, the Project is a Section 501(c)(3) organization whose mission is to educate and provide information to the American public about the cruelties inflicted on animals from taxpayer-funded experimentation.<sup>2</sup> To further its mission, “White Coat Waste Project’s team of seasoned issue advocates, scientists, doctors and political strategists combines grassroots tactics, media campaigns, diverse coalitions, creative legal tools, and lobbying to expose and stop government spending on wasteful animal experimentation.”<sup>3</sup> Anthony Bellotti is the President and Founder of the Project, and Justin Goodman is the organization’s Senior Vice President for Advocacy and Public Policy. *See* Signed Affidavit of Anthony Bellotti, attached hereto as Exhibit A.

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<sup>1</sup> The Complaint includes additional allegations that pertain to federal tax law and, thus, need not be responded to here since they are outside the Act’s scope.

<sup>2</sup> White Coat Waste Project, *About*, <https://www.whitecoatwaste.org/about/> (last visited Apr. 5, 2022).

<sup>3</sup> *Id.* (click “How We Do It”).

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The PAC is a nonconnected political committee that first filed its FEC Form 1—Statement of Organization in 2017.<sup>4</sup> As stated on its website, “[t]he nonpartisan White Coat Waste PAC is the first and only Political Action Committee supporting candidates for U.S. Congress who are committed to stopping \$15 billion in wasteful government spending on animal experiments.”<sup>5</sup> Since its creation in 2017, the PAC has contributed approximately \$30,300 to Democratic candidates and \$25,700 to Republican candidates.<sup>6</sup> Consistent with its status as a nonconnected political committee, the PAC has paid, and continues to pay, its solicitation and administrative costs (e.g., legal services, compliance consulting, website expenses, fundraising services) out of the committee’s receipts.

## II. LEGAL BACKGROUND

Critical to the resolution of this matter is the legal distinction between nonconnected political action committees (“PACs”) and connected PACs (otherwise known as separate segregated funds or “SSFs”<sup>7</sup>). Both categories of PACs share the same organization, registration, and reporting requirements.<sup>8</sup> They likewise are subject to the same limitations on the contributions they can receive and make.<sup>9</sup>

The crucial differences between nonconnected PACs and connected PACs lie in (1) how they can pay for their establishment, administrative, and solicitation costs and (2) whom they can solicit for contributions. A connected PAC (as its name indicates) has a *connected organization* (such as a corporation, labor union, or trade association) that establishes, administers, and financially supports the PAC using general treasury funds.<sup>10</sup> Such payments by the connected organization are exempted from the definition of “contribution” or “expenditure”<sup>11</sup> and are not required to be disclosed. Thus, a connected organization’s general treasury funds can be used to cover costs associated with “office space, phones, salaries, utilities, supplies, legal and accounting fees, fund-raising and other expenses incurred in setting up and running a separate segregated fund [i.e., connected PAC].”<sup>12</sup>

Connected PACs are limited, however, in whom they may solicit for contributions. A connected PAC whose connected organization is a corporation may solicit contributions from its “restricted class”—i.e., its executive and administrative personnel, its stockholders, and immediate family members of individuals in those two groups.<sup>13</sup> Moreover, twice a year, the corporation and its connected PAC may solicit its non-restricted class employees, subject to certain restrictions.<sup>14</sup> But corporations and their connected PACs are strictly prohibited from soliciting contributions

<sup>4</sup> <https://docquery.fec.gov/pdf/927/201702109049342927/201702109049342927.pdf>.

<sup>5</sup> White Coat Waste PAC, *About Us*, <https://www.whitecoatwastepac.org/about-us/>.

<sup>6</sup> PAC Profile: *White Coat Waste*, Open Secrets, <https://www.opensecrets.org/political-action-committees-pacs/white-coat-waste/C00632760/summary/2022> (last visited Apr. 13, 2022).

<sup>7</sup> 2 U.S.C. § 30101(4)(b); 11 C.F.R. § 114.5.

<sup>8</sup> 2 U.S.C. §§ 432, 433, & 434; 11 C.F.R. §§ 102.1, 102.2, 102.7, & 104.

<sup>9</sup> 2 U.S.C. § 30116(a)(1) & (2); 11 C.F.R. §§ 110.1 & 110.2.

<sup>10</sup> 11 C.F.R. § 100.6.

<sup>11</sup> 2 U.S.C. § 30118(b)(2)(C); 11 C.F.R. § 114.1(a)(2)(iii).

<sup>12</sup> 11 C.F.R. § 114.1(b).

<sup>13</sup> 52 U.S.C. § 30118(b)(4)(A)(i); 11 C.F.R. § 114.5(g)(1).

<sup>14</sup> 52 U.S.C. § 30118(b)(4)(B); 11 C.F.R. § 114.6.

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from the general public.<sup>15</sup> In short, the significant benefit that a connected PAC receives by having its operational costs subsidized by a connected organization (which would otherwise be subject to the ban on corporate and labor union contributions<sup>16</sup>) is paired with a limitation on the scope of potential solicitation targets.

By contrast, the rules governing nonconnected PACs with respect to payments for establishment, administrative, and solicitation costs and the universe of permissible donors are the inverse of the rules applicable to connected PACs. The costs associated with operating a nonconnected PAC cannot be subsidized by the treasury funds of a corporation or other organization; rather, such costs must be paid out of receipts from PAC donors. But in exchange for accepting this restriction, a nonconnected PAC may permissibly solicit contributions from the general public.

FEC precedents make clear that employees of an organization (such as a corporation) can form a nonconnected PAC without that committee being considered the SSF of the organization, provided certain conditions are met. As explained in Advisory Opinion 2000-20 (Committee for Quality Cancer Care), “When the Commission has examined the establishment of a new non-connected political committee, the analysis has *centered on* whether the proposed non-connected committee receives ‘financial support,’ within the meaning of section 100.6 of Commission regulations, from another entity.”<sup>17</sup> While in such matters “the Commission has [also] considered the role which members or controlling individuals of other organizations play in the creation and operation of the proposed non-connected committee,”<sup>18</sup> the lack of financial support from an outside organization for a nonconnected PAC’s activities has been deemed sufficient to dismiss an allegation that a nonconnected PAC should be considered a SSF.

For instance, in Matter Under Review (“MUR”) 6746 (AICPAC), the Complaint alleged that a nonconnected PAC was actually the SSF of a corporation, arguing that the corporation’s president (1) administered the PAC using corporate resources and facilities and (2) simultaneously served as PAC treasurer, was exclusively responsible for establishing the PAC, and controlled the day-to-day operations of both the corporation and the PAC.<sup>19</sup> The Commission dismissed the complaint pursuant to its prosecutorial discretion.<sup>20</sup> In doing so, the Commission justified its disposition solely on the ground that the PAC did not receive financial support from the corporation, never addressing the issue of organizational independence after resolving that threshold question.<sup>21</sup> The Commission noted that no information indicated the PAC had used, or otherwise failed to pay for use of, corporate resources.<sup>22</sup> In fact, according to the Commission, the PAC’s disclosure reports showed “that since its establishment . . . , it has paid its administrative,

<sup>15</sup> 52 U.S.C. § 30118(b)(4)(A)(i); 11 C.F.R. § 114.5(G)(1).

<sup>16</sup> 52 U.S.C. § 30118(a); 11 C.F.R. § 114.2(b) (ban on corporate and labor union contributions and expenditures); *but see* 52 U.S.C. § 30118(b)(2)(C); 11 C.F.R. § 114.1(a)(2)(iii) (exempting from the definitions of “contribution” and “expenditure” payments by corporations and labor unions for establishing, administering, and soliciting contributions to an SSF).

<sup>17</sup> FEC Advisory Op. 2000-20 (Committee for Quality Cancer Care) at 4 (emphasis added).

<sup>18</sup> *Id.*

<sup>19</sup> Complaint, MUR 6746 (AICPAC) at 9-10, 11.

<sup>20</sup> Certification (Mar. 18, 2016), MUR 6746 (AICPAC).

<sup>21</sup> Factual and Legal Analysis (Apr. 19, 2016), MUR 6746 (AICPAC) at 4-5.

<sup>22</sup> *Id.* at 5.

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compliance, and fundraising costs from its own funds[.]”<sup>23</sup> The Commission, therefore, concluded that “[i]n light of the information demonstrating [the PAC’s] financial independence, we do not believe that it is a prudent use of Commission resources to proceed with this matter.”<sup>24</sup>

### III. LEGAL ANALYSIS

#### A. The Complaint Lacks Sufficient Information to Sustain a “Reason to Believe” Finding.

The Commission has previously explained that it “may find reason to believe [a violation of the Act has occurred] only if a complaint sets forth sufficient specific facts, which, if proven true, would constitute a violation of the FECA.”<sup>25</sup> The Complaint in this matter falls well short of meeting this standard.

To start, even though the core of the Complaint centers on the allegation that the PAC is an SSF that has improperly solicited funds from outside of its restricted class, the Complainant separately admits that it has no idea what quantity of funds have been raised from contributors outside of that pool. The Complaint speculates that “as much as 76% of all the money the PAC has raised since its inception” *could have been* contributed by individuals outside the restricted class, while acknowledging that this would mean every single dollar not separately itemized was raised from outside this class.<sup>26</sup> This is nothing more than a shot in the dark. The Complaint has no insight into the identity of the PAC’s other contributors, and any insinuation otherwise is nothing but a guess unsupported by any factual evidence.

The few non-speculative details the Complaint points to range from incorrect to irrelevant. The Complaint alleges, for instance, that “WCW PAC and the WCW Project have the same stop sign-shaped logo containing the same slogan.”<sup>27</sup> The two logos, however, are not identical: The PAC’s logo utilizes a crimson-and-black color scheme (as well as the PAC’s name), whereas the Project’s logo uses an emerald-and-black color scheme and the Project’s name.<sup>28</sup> As for the identical slogan, it is not particularly significant that two organizations pursuing the same goal through different means—i.e., stopping taxpayer-funded animal experimentation—would use the same language to describe that mission.<sup>29</sup>

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<sup>23</sup> *Id.*

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

<sup>25</sup> Statement of Reasons of Commissioners David M. Mason, Karl J. Sandstrom, Bradley A. Smith, and Scott E. Thomas (Dec. 21, 2000), MUR 4960 (Hillary Rodham Clinton for U.S. Senate Exploratory Committee, Inc.) at 1-2.

<sup>26</sup> Compl. at 3.

<sup>27</sup> *Id.* at 2.

<sup>28</sup> Compare <https://www.whitecoatwastepac.org/> (displaying PAC logo) with <https://www.whitecoatwaste.org/> (displaying Project logo).

<sup>29</sup> It is certainly not novel, nor has it been deemed impermissible, for a Section 501(c)(3) organization and a nonconnected PAC to share similar names and to use nearly identical logos. For example, compare the logo of the 501(c)(3) organization Planned Parenthood Federation of America, Inc. (<https://www.plannedparenthood.org/>) with that of the federal Super PAC Planned Parenthood Votes (<https://www.weareplannedparenthoodvotes.org/onlineactions/meGXxGaIBUS46t9t7ZDhIw2>), which differ only on the basis of entity name and color scheme, just like the allegedly “identical” logos used here.

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The Complaint also frequently infers collusion from what is merely coincidence. The Complaint notes that the PAC first registered as a nonconnected committee with the FEC on February 10, 2017, and that the Project spokesman Justin Goodman “filed a lobbying registration statement indicating he would be lobbying on behalf of the WCW Project” ten days later.<sup>30</sup> It is not clear what the Complaint is even trying to allege here, beyond the fact that both organizations were ramping up separate lobbying and political spending operations in roughly the same timeframe. Engaging in separate operations at the same time is not evidence of a FECA violation.

In a similar vein, the Complaint alleges that the PAC has made contributions to seven federal candidates who have introduced legislation that has been supported by the Project through publicly reported lobbying activities.<sup>31</sup> Again, the Complaint does not attempt to argue that such contributions were in any way unlawful, but simply infers causation where there is, at best, only correlation. The fact that a federal PAC organized to support candidates who advance its goals of preventing taxpayer-funded animal experimentation would contribute to candidates with a record of supporting legislation relevant to that goal is unremarkable and far from adequate support for the Complaint’s allegation that the two entities are connected.

While it is long on bare allegations, the Complaint is glaringly short on factual support. As demonstrated above, the Complaint fails to meet the evidentiary threshold necessary for the Commission to make a reason-a-believe finding.

**B. The PAC Maintains Financial and Organizational Independence from the Project and, Thus, is Properly Registered as a Nonconnected PAC.**

The sum of the Complaint’s allegations does not add up to a violation of FECA. It is not the case, as the Complaint implies, that individuals involved in operating a given nonprofit corporation are prohibited from engaging on their own time in outside political activities that are not a part of their professional duties; in fact, the FEC has previously approved arrangements such as this.<sup>32</sup> Such arrangements are not invalid so long as “certain conditions are met with respect to the financial and organizational relationship between the committee and the corporation.”<sup>33</sup>

The FEC has consistently applied a two-factor test to determine whether a PAC is legally an SSF of a corporation. As noted above, this test has historically “centered on whether the [] non-connected committee receives ‘financial support,’ . . . from another entity.”<sup>34</sup> The definition of “financial support” is provided by 11 C.F.R. 100.6(c), which explains that the phrase “does not include contributions to the political committee, but does include the payment of establishment, administration and solicitation costs of such committee.” Secondarily, the Commission has also “considered the role which members or controlling individuals of other organizations play in the

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<sup>30</sup> Compl. at 4.

<sup>31</sup> *Id.* at 5.

<sup>32</sup> See FEC Advisory Op. 1997-15 (Americans for Better Government PAC); FEC Advisory Op. 1997-26 (Clean Water PAC) at 3 (“The Act and Commission regulations do not prescribe qualifications on the individuals who may establish, organize, and direct a non-connected political committee; nor do they necessarily prohibit individuals who have some association with a corporation . . . from such activity.”).

<sup>33</sup> FEC Advisory Op. 1997-26 at 3.

<sup>34</sup> FEC Advisory Op. 2000-20 at 4.

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creation and operation of the [] non-connected political committee.”<sup>35</sup> The Complaint does not present evidence sufficient to carry its burden on either prong.

With regard to financial support—the most significant element of the Commission’s test—the Complaint’s allegations are paltry. It mentions that Anthony Bellotti, the president of the Project, registered a website domain on behalf of the PAC on April 22, 2017, and that “[t]he WCW Project—not the WCW PAC—is listed as both the registrant organization and the administrative organization for the WCW PAC website.”<sup>36</sup> The reason for this is easily explained: Mr. Bellotti, who is also a board member of the PAC, originally set up that GoDaddy account in his own name and used it to register various domains since 2007 — years before he founded the Project, and nearly a decade before he co-founded the PAC. In early 2017, Mr. Bellotti acquired the PAC domain from its original owner and initial registrant, and had it transferred into this GoDaddy account (which, at the time, also housed Project domains). Mr. Bellotti regularly paid the PAC’s respective GoDaddy fees with his personal credit card, and these transactions were subsequently reimbursed by the PAC from its own receipts. Ex. A, ¶ 4. Starting in December 2020, in an effort to professionalize Project billing operations, the registered name on that GoDaddy account was changed to the Project itself and a process was started to shift non-Project-related items to other accounts. *Id.* ¶¶ 6-7. In June 2021, the credit card associated with this GoDaddy account was changed from Mr. Bellotti’s personal card to a new corporate credit card intended for the exclusive use of the Project. *Id.* ¶ 8. Because the card associated with the GoDaddy account was set to pay all recurring expenses attributable to the account, the next annual web hosting fee for the PAC’s website was automatically deducted from the new Project credit card. *Id.* ¶ 9. This accidental payment was fully reimbursed (with interest) by the PAC out of its own receipts promptly after the error was discovered, as demonstrated by the invoices attached hereto as Exhibit B. This inadvertent error (which involved services valued at less than \$200) represents the full extent of the Complaint’s evidence of “financial support”—a rather thin reed on which to hang an allegation. *See* Ex. A; Ex. B.

The Complaint further alleges that Respondents Bellotti and Goodman have made significant monetary contributions to the PAC, but this is not the kind of “financial support” that would render the PAC connected to the Project. The relevant FEC regulation expressly states that financial support “does not include contributions to the political committee.”<sup>37</sup> Hence, Mr. Bellotti and Mr. Goodman were not prohibited from making contributions to the PAC out of their personal funds simply because they are separately affiliated with the Project; all their political contributions to the PAC were made in their personal capacities. The Complaint notes that Mr. Bellotti and Mr. Goodman have together contributed “nearly 24% of all the money raised by the PAC” since its registration but fails to explain why voluntary contributions from their personal funds is legally relevant.<sup>38</sup> That is because Mr. Bellotti’s and Mr. Goodman’s contributions to the PAC in no way support the notion that the PAC was connected to the Project.

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<sup>35</sup> *Id.*

<sup>36</sup> Compl. at 2.

<sup>37</sup> 11 C.F.R. 100.6(c).

<sup>38</sup> Compl. at 3.

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As demonstrated above, the Complaint has not adequately alleged that the Project provided financial support to the PAC, and based on Commission precedents, the inquiry could stop here.<sup>39</sup> Nevertheless, the facts here also support a finding that the PAC is organizationally independent from the Project. Two board members of the PAC simultaneously serve as board members for the Project, but each entity also has unique board members who are not involved with the other organization—an indicator of organizational independence.<sup>40</sup> Furthermore, any PAC activities undertaken by Mr. Bellotti and Mr. Goodman took place during personal (not organizational) time and involved non-Project resources. Although the two entities have each used the address of the same law firm as a mailing address in the past, this is also not prohibited by Commission precedent; a nonconnected PAC may use the same law firm for legal services as a corporation so long as it “pay[s] the firm directly for such services,” which the PAC does.<sup>41</sup> In sum, the PAC qualifies as a nonconnected PAC because it is financially and organizationally independent of the Project.

**C. This Matter Would Warrant Dismissal Pursuant to the Commission’s Prosecutorial Discretion Even If a Technical Violation Occurred Here.**

Finally, even if the Commission were to determine that the Project provided financial and organizational support to the PAC (though for reasons articulated above, it should not), the facts here would still warrant dismissal pursuant to the Commission’s prosecutorial discretion because any such support was *de minimis* in nature. Pursuing this matter further would be an imprudent use of the Commission’s limited resources.

The Commission has recently dismissed complaints regarding nonconnected PACs alleged to be SSFs that involved allegation much more serious than those here. In MUR 7528, the Commission’s Office of General Counsel (“OGC”) recommended that the Commission find reason to believe that the nonconnected PAC in question was actually an SSF because it appeared “to have received financial support from [two corporations] by utilizing their employee mailing list and by using company resources,” and also because the PAC did “not appear to be independent” due to the fact that four of its five board members were affiliated with the corporation or one of its subsidiaries.<sup>42</sup> Notwithstanding OGC’s analysis that the PAC was “organizationally and financially controlled by” the corporation,<sup>43</sup> the Commission did not have four votes to find reason to believe that a violation of the Act had occurred. The controlling bloc of Commissioners explained that they were exercising their prosecutorial discretion to dismiss the complaint because, among other things, “[d]isclosure reports suggest that [the] PAC’s fundraising and expenditures are modest, and any potential penalty to be assessed is likely also small.”<sup>44</sup> The facts presented, and allegations made, in this matter are significantly less weighty than those in MUR 7528, which provides even greater justification for dismissing this matter.

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<sup>39</sup> See, e.g., Factual and Legal Analysis (Apr. 19, 2016), MUR 6746 (AICPAC) at 4-5 (evaluating only financial support and, finding none, refraining from evaluating organizational independence).

<sup>40</sup> See Factual and Legal Analysis (June 13, 2007), MUR 5830 (U.S.-Cuba Democracy PAC) at 4 (concluding that a nonconnected PAC could be established where “the corporation did not financially support the PAC, and persons outside of the corporation were involved in the conduct and control of the PAC”) (emphasis added).

<sup>41</sup> FEC Advisory Op. 1997-15 at 7.

<sup>42</sup> First General Counsel’s Report (Aug. 30, 2019), MUR 7528 (Yukon Kusko PAC) at 11.

<sup>43</sup> *Id.* at 13.

<sup>44</sup> Statement of Reasons of Vice Chair Allen Dickerson, Commissioners Sean J. Cooksey & James E. Trainor (Nov. 1, 2021, MUR 7528 (Yukon Kusko PAC) at 4-5 (Nov. 1, 2021).



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Similarly, in MUR 6746, the Commission voted 4-2 against finding reason to believe a nonconnected PAC was actually an SSF when its treasurer and custodian of records was also the president of a for-profit corporation.<sup>45</sup> Affirming once again that the relevant consideration were the degree of financial support and operational independence of the PAC vis-à-vis the corporation, the Commission exercised its prosecutorial discretion in dismissing the complaint after determining that the available evidence indicated the PAC had properly paid for access to all corporate resources that it had used.<sup>46</sup> After finding a lack of financial support, the Commission did not even analyze the secondary organizational independence prong, thereby confirming that the financial support test is the predominant inquiry.<sup>47</sup> As in MUR 6746, the PAC has since its creation paid its solicitation and administrative expenses out of the PAC's receipts; moreover, the PAC has reimbursed any expenditures made on its behalf by its board member Mr. Bellotti as well as any inadvertent expenses (see discussion above). Therefore, the reasons for dismissing the complaint in MUR 6746 apply with equal force to the Complaint in this matter.

#### IV. CONCLUSION

The PAC, as a separate and distinct legal entity, has never relied upon the Project for financial or organizational support. Although a handful of individuals are involved in the management of both organizations, they participate in and contribute to the activities of the PAC in their personal capacities—not as organizational representatives of the Project. Finally, even assuming *arguendo* that the Project provided some financial and organizational support to the PAC, such support was *de minimis* and should be dismissed pursuant to the Commission's prosecutorial discretion. For these reasons, the Commission should summarily dismiss the Complaint and close the file with respect to this matter.

Sincerely,




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Matthew Petersen  
 Steve Roberts  
*Counsel to White Coat Waste PAC;  
 White Coat Waste Project, Inc.;*  
*Anthony Bellotti; and  
 Justin Goodman*

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<sup>45</sup> Certification (Mar. 16, 2016), MUR 6746 (AICPAC).

<sup>46</sup> Factual and Legal Analysis (Apr. 19, 2016), MUR 6746 (AICPAC) at 4-5.

<sup>47</sup> *See id.*

# EXHIBIT A

**AFFIDAVIT OF ANTHONY BELLOTTI**  
(28 U.S.C. § 1746)

Anthony Bellotti declares under penalty of perjury:

1. My name is Anthony Bellotti. I am the President, Founder, and member of the board of directors of the White Coat Waste Project, Inc. (the “Project”), a Virginia nonstock corporation organized under Section 501(c)(3) of the Internal Revenue Code.
2. I am also the President and a member of the board of directors of the White Coat Waste PAC (the “PAC”), a Virginia nonstock corporation registered with the Federal Election Commission as a nonconnected federal political committee.
3. Although I am involved in the governance of both the Project and the PAC, my primary employment is as President of the Project, and all work that I have performed on behalf of the PAC since its creation in 2017 has occurred in a volunteer capacity on my own time.
4. Because I am the President and a board member of both the Project and the PAC— two organizations I built from the ground up—I have traditionally used my personal credit card to pay recurring expenses for each, such as the annual GoDaddy web hosting fees required to maintain the entities’ respective websites. The Project and the PAC would then reimburse me promptly out of their own funds for any expenses that I had incurred on each entity’s behalf.
5. The PAC’s domain name was acquired from its original owner in early 2017 and transferred into a personal GoDaddy account that I had maintained since 2007. Hence, it was *never* intended to be registered to the Project but to me, personally.
6. Starting in December 2020, in an effort to professionalize billing operations for the Project, we began to update my personal GoDaddy account to reflect that it was now the GoDaddy account for the Project itself. Both the account name and primary email address were

updated to reflect this change, but the credit card that was on file with this account for the payment of automatically recurring transactions was still my personal card.

7. From December 2020 through April 2021, the Project began transferring various non-Project-related items out of its GoDaddy account (formerly listed as my personal account) and into other accounts that were not related to the Project or its operations. Since April 2021, this GoDaddy account has served as the Project's primary corporate account.
8. In June 2021, I obtained a corporate credit card for the Project so that I would no longer have to pay most of the recurring Project expenses using my personal card. The Project's GoDaddy account was updated accordingly to reflect the fact that all future recurring expenses attributable to the Project would be automatically deducted from the Project's new corporate card.
9. When the PAC's next bill for web hosting services came due the payment was automatically deducted from the new Project corporate credit card associated with the GoDaddy account, although I had intended bills attributable to the PAC to continue being paid using my personal card to reflect the fact that I engaged in PAC activities on my personal time.
10. Shortly after this error was identified, the Project invoiced the PAC for the reimbursement of the charge it had incurred on the PAC's behalf, including interest accrued at a rate of five percent (5%). The PAC promptly paid that invoice on March 4, 2022.
11. I am aware of no outstanding payments requiring reimbursement that the Project has incurred on behalf of the PAC.

I declare under penalty of perjury that the foregoing is true and correct.

Affiant's Signature:   
Executed on April 14, 2022

Anthony Bellotti

# **EXHIBIT B**

**White Coat Waste Project**  
 PO Box 26029  
 Washington, DC 20001 US  
 info@whitecoatwaste.org  
 https://www.whitecoatwaste.org/

# Invoice


**BILL TO**

Janna Rutland  
 White Coat Waste PAC  
 15405 John Marshall Highway  
 Haymarket, VA 20169

INVOICE #	DATE	TOTAL DUE	DUE DATE	TERMS	ENCLOSED
1057	03/04/2022	\$187.66	04/03/2022	Net 30	

DATE	SERVICE	DESCRIPTION	QTY	RATE	AMOUNT
	<b>Web Hosting</b>	GoDaddy Web URLs Reimbursement (Inv #1902911251, 7/16/22)	1	175.36	175.36
	<b>Web Hosting</b>	Interest (5%)	1	8.77	8.77
	<b>Software</b>	Slack Reimbursement (Inv # CAA4B419-0001, 10/26/21 through 3/1/22)	1	3.36	3.36
	<b>Software</b>	Interest (5%)	1	0.17	0.17

**WIRE TRANSFER INSTRUCTIONS**

White Coat Waste Project  
 ACCOUNT: [REDACTED]  
 ROUTING: [REDACTED]  
 BANK: Bank of America (222 Broadway, New York, NY 10038)

**BALANCE DUE**
**\$187.66**
**CHECK INSTRUCTIONS**

Make all checks payable to:  
 White Coat Waste Project  
 PO Box 26029  
 Washington DC 20001