



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**BEFORE THE FEDERAL ELECTION COMMISSION**

In the Matter of )  
 )  
Salvemos a Puerto Rico, *et al.* ) MUR 7772  
 )

**STATEMENT OF REASONS OF VICE CHAIR ELLEN L. WEINTRAUB AND  
COMMISSIONER SHANA M. BROUSSARD**

This matter stems from a criminal conspiracy, in which two shell 501(c)(4) nonprofit corporations, Fundación Pro Igualdad, Inc. and Foundation for Progress, Inc. (collectively, the “Foundations”), funneled \$250,000 to Salvemos a Puerto Rico, an independent expenditure-only political committee (“IEOPC”) to conceal the identities of the contributors.<sup>1</sup> The treasurer of Salvemos a Puerto Rico now sits in federal prison after pleading guilty to making false statements to the Commission about the true identities of the contributors.<sup>2</sup> However, the Foundations were left to the Commission’s jurisdiction for effective civil enforcement of the Federal Election Campaign Act of 1971, as amended, and its prohibition against making contributions in the name of another.<sup>3</sup> The record before the Commission was crystal clear that the Foundations knowingly permitted their names to be used to effect the contributions in the name of another.<sup>4</sup> Unfortunately, we could not reach a four-vote consensus to enforce the law against the Foundations.<sup>5</sup>

Section 30122 violations are some of the most significant violations that come before the Commission since they undermine the core transparency mission of the agency. The Commission should show that it takes these violations seriously. A dismissal with admonishment is not an appropriate resolution for a case of this magnitude, in which the main Respondents were criminally prosecuted, pleaded guilty, and sentenced. The Foundations, which are separate legal entities from the criminal defendants, have not been held responsible, and the Commission’s interest in robust enforcement of this important provision of the law has not been fully vindicated. Even in circumstances where violators may not have the financial resources to pay large civil penalties, as may be the case in the political sphere at the end of a campaign, the Commission still has important transparency and accountability interests in

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<sup>1</sup> See First Gen. Counsel’s Rpt. (“FGCR”) at 3, MUR 7772 (Salvemos a Puerto Rico, *et al.*).

<sup>2</sup> *Id.*; see also *President and Treasurer of Super PAC Sentenced for Dark Money Scheme*, U.S. Dept. of Justice (Aug. 26, 2022), <https://www.justice.gov/opa/pr/president-and-treasurer-super-pac-sentenced-dark-money-scheme>.

<sup>3</sup> See 52 U.S.C. § 30122.

<sup>4</sup> See FGCR at 20.

<sup>5</sup> See Certification ¶ 4 (Jan. 23, 2024).

enforcing the law. Law enforcement decisions are about more than dollars and cents.

The Commission should have approved the well reasoned recommendations of our Office of General Counsel and we voted accordingly.<sup>6</sup>

February 29, 2024

\_\_\_\_\_  
Date



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Ellen L. Weintraub  
Vice Chair

February 29, 2024

\_\_\_\_\_  
Date



\_\_\_\_\_  
Shana M. Broussard  
Commissioner

<sup>6</sup> See *id.*, FGCR at 31.