



June 25, 2026

TO: The Honorable Caryl Brzymialkiewicz
Acting Inspector General
U.S. Department of the Interior
1849 C Street, N.W.
Washington DC 20240

CC: The Honorable Doug Burgum
Secretary
U.S. Department of the Interior
1849 C Street, N.W.
Washington DC 20240

RE: Inspector General complaint regarding National Wildlife Federation’s potential misuse of taxpayer funds for partisan political campaign activity

Dear Acting Inspector General Brzymialkiewicz,

We are writing to respectfully request that the Department of the Interior (DOI) initiate an Inspector General investigation into the National Wildlife Federation’s (NWF) potential misuse of federal grant funds for partisan political activity. The NWF is a 501(c)(3) organization which describes itself as “America's largest and most trusted conservation organization, works across the country to unite Americans from all walks of life in giving wildlife a voice.”¹ Despite the NWF’s claim that it is a conservation-focused organization, we have uncovered evidence that raises serious concerns over whether it has in fact prioritized its own partisan political objectives in violation of its tax exempt status and federal grantee obligations.

The Center to Advance Security in America (CASA) is a nonpartisan organization dedicated to improving the safety and security of the American people. CASA educates and informs the American people about the actions of their government, and officials that impact the people’s safety, peace and security, and civil rights.

Background

In September 2024, the DOI’s Bureau of Land Management (BLM) granted \$872,887.50 to the NWF for projects in Montana. According to USASpending.gov, the NWF received the following grant:²

¹ National Wildlife Federation. “About Us.” <https://www.nwf.org/About-Us>

² USASpending.gov, “Federal Awards Search,” accessed June 3, 2026, www.usaspending.gov/search?hash=b12efb6deeb7cd2f5ef0faf5c643ec1d



Start Date	Grantor	Purpose	Amount
09/01/2024	U.S. Department of the Interior, Bureau of Land Management	Assist BLM and partners within the hi-line sagebrush anchor restoration landscape restore up to 50 miles of riverscape (Montana)	\$872,887.50

The NWF has an affiliated, but legally separate, 501(c)(4) social welfare organization, the National Wildlife Federation Action Fund (the Action Fund), through which it works to raise the visibility of key conservation issues with voters and elected officials and engages in partisan political activity. The Action Fund’s website describes its mission as follows: “through grassroots actions and focused legislative campaigns, the Action Fund advocates for solutions to protect, restore, and connect wildlife habitat; transform wildlife conservation; and connect Americans with wildlife.”³

In October 2024, a month after the NWF received the \$872,887.50 in federal funds from DOI, the Action Fund disclosed \$299,985 in independent expenditures with the Federal Election Commission, supporting Jon Tester in his U.S. Senate race in Montana, as shown below:⁴

Date	Independent Expenditure	Purpose
10/08/2024	\$274,665	Digital Advertising in support of Jon Tester
10/15/2024	\$25,320	Direct Mail in support of Jon Tester

According to a 2026 audit report for the 501(c)(3) NWF, the Federation disclosed that in fiscal years ending in August 2024 and August 2025, time periods that fall within two months of and include the window of the independent expenditure spending, it had provided \$260,000 in grants to the National Wildlife Federation Action Fund.⁵

On February 19, 2025 the Federal Election Commission (FEC) sent a letter to the Action Fund regarding its failure to file Form 5: Year-End Report (10/01/2024 - 12/31/2024), which is a mandatory disclosure of independent expenditures made and contributions received as required by the Federal Election Campaign Act, as amended, and 11 C.F.R. § 109.10(b).⁶

³ National Wildlife Federation Action Fund. “Mission and History.” Accessed June 3, 2026. [NWF Action Fund Mission and History](#).

⁴ Federal Election Commission, “FEC Filing for Committee C90009994,” accessed June 3, 2026, <https://docquery.fec.gov/cgi-bin/forms/C90009994/1878711/f57>.

⁵ National Wildlife Federation, National Wildlife Federation and Subsidiary: Consolidated Financial Statements for the Years Ended August 31, 2025 and 2024, and Report Thereon; Reports Required in Accordance with the Uniform Guidance for the Year Ended August 31, 2025 (2025), <https://www.nwf.org/-/media/Documents/PDFs/Annual-Reports/FY25-NWF-AFS.pdf>

⁶ Federal Election Commission, Report Filed with the Federal Election Commission, filing no. 202502200300241312, February 20, 2025, PDF, accessed June 3, 2026, <https://docquery.fec.gov/pdf/312/202502200300241312/202502200300241312.pdf>.



On March 10, 2025, the FEC sent a letter to the Action Fund regarding its failure to disclose the donors for the independent expenditure's spending. In a March 20, 2025, response to the FEC's request, Karla Raettig stated on behalf of the Action Fund: "This letter is in response to the request for additional information dated March 10, 2025, related to National Wildlife Federation Action Fund's Year-End Report. Based on a review of its receipts during the reporting period, the Organization did not receive any additional contributions that were earmarked for any independent expenditure or political purpose as that term is defined under *CREW v. FEC*."⁷

In summary, NWF received \$872,887.50 on September 1, 2024, in DOI federal grant funds for work to be performed in Montana and less than a month later the Action Fund spent \$299,985 on an independent expenditure in Montana in support of Senator Jon Tester. NWF's own audit showed that during that same time period, \$260,000 was granted from NWF, a 501(c)(3) to the Action Fund, a 501(c)(4) – a nearly identical amount of money to the amount the Action Fund spent in Montana in their independent expenditure in support of Senator Jon Tester. Finally, a representative of the Action Fund stated in response to an FEC inquiry that the Action Fund's independent expenditure in Montana in support of Senator Tester was funded from their own bank account, and not from funds earmarked by a particular donor for that effort.

Law and Analysis

501(c)(4) organizations like the Action Fund must be operated exclusively to promote social welfare. A 501(c)(4) organization may engage in some political activities, so long as that is not its primary activity.⁸ Treasury Regulation § 1.501(c)(4)-1(a)(2)(ii) explicitly states that "[t]he promotion of social welfare does not include direct or indirect participation or intervention in political campaigns on behalf of or in opposition to any candidate for public office."⁹ The aforementioned expenditures directly in support of Tester's Senate candidacy, while typically permitted if they don't represent the organization's primary purpose, may be inappropriate and not permitted if they are drawing on funds from a related tax-exempt educational organization.

To this point, 501(c)(3) organizations like the NWF are held to a more stringent standard when it comes to political activity, and will be considered as not operating exclusively for exempt purposes if they directly or indirectly participate in, or intervene in (including the publishing or distributing of statements), any political campaign on behalf of or in opposition to

⁷ Federal Election Commission, *Report of Receipts and Disbursements*, filing no. 202503209754250735, March 20, 2025, PDF, accessed June 3, 2026, <https://docquery.fec.gov/pdf/735/202503209754250735/202503209754250735.pdf>.

⁸ Internal Revenue Service, "Social Welfare Organizations," last reviewed or updated January 22, 2025. <https://www.irs.gov/charities-non-profits/other-non-profits/social-welfare-organizations>.

⁹ Treas. Reg. § 1.501(c)(4)-1(a)(2)(ii).



any candidate for public office.¹⁰ If the political activities of the Action Fund can be attributed to the NWF, that would violate the conditions of their tax-exempt status.

When federal funds are involved, greater scrutiny is required to ensure taxpayers are not being tricked into funding partisan political efforts. For this reason, we respectfully request that the Department of the Interior Inspector General investigate the facts and circumstances surrounding the NWF's potential misuse of taxpayer federal grant funds. Money is fungible and there can be no possibility that federal funds were used for impermissible partisan political purposes. Federal funds can in no way be filtered through related social welfare organizations which engage in partisan political activity. If this occurred, the NWF, acting through the Action Fund, may have violated both the terms of its taxpayer grants and the IRS rules governing 501(c)(3) and (4) organizations.

Thank you for your attention to this matter and for your continued efforts to protect and manage the Nation's natural resources and cultural heritage.

Respectfully,

James Fitzpatrick
Director
Center to Advance Security in America
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¹⁰ Treas. Reg. § 1.501(c)(3)-1(b)(3).