

## CAMPAIGN FINANCE COMPLAINT

Complainant: Robert LaBrant  
12411 Pine Ridge Drive  
Perry, MI 48872

Alleged Violators: 1) Unlock Michigan  
2145 Commons Parkway  
Okemos, MI 48864

2) Michigan Citizens for Fiscal  
Responsibility  
106 W. Allegan St., Ste. 200  
Lansing, MI 48933

3) Michigan! My Michigan!  
106 W. Allegan St., Ste. 200  
Lansing, MI 48933

Sections of the MCFA alleged to be violated: MCL 169.215(15), 169.221(12), 169.224(2)(c), 169.224(2)(f), 169.234, and 169.241(3)

### INTRODUCTION

“Voters have an interest in knowing where politicians and organizations are getting their money and how that money is being spent. To that end, dark-money. . . groups do not need more loopholes.”

-League of Women Voters  
of the United States

Unlock Michigan is not a spontaneous grassroots effort to repeal the law granting a Michigan governor emergency powers. Unlock was conceived by Senator Mike Shirkey to achieve his political goal of repealing that law, a plan executed by his agents under his direction and control, and funded with his dark money.<sup>1</sup>

Shirkey’s scheme involved the illegal use of dark money on a scale never before seen in Michigan as millions of dollars in dark money was raised and spent. The abuses of dark money by Unlock, Michigan Citizens for Fiscal Responsibility (“MCFR”) and Michigan! My Michigan! (“MMM”) are a violation of the Michigan Campaign Finance Act (“MCFA”) which should be investigated and punished.

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<sup>1</sup> As used herein “dark money” refers to funds not usually subject to disclosure under the MCFA.

## BACKGROUND: THE ABUSE OF DARK MONEY IN NATIONAL AND MICHIGAN POLITICS

The extensive use of dark money in national and Michigan politics has been well-documented as has its corrosive effects on democracy and confidence in government:

[I]t is at the state and local levels that secret spending is arguably at its most damaging. For a clear understanding of the degree to which dark money is warping American democracy, *state ballot referenda* . . . may be a better starting point than the presidential campaign or even congressional races.

...

*[W]eak. . . enforcement [is] open country for dark money spenders.*

Brennan Center for Justice, *Secret Spending In The States* 2, 33 (2019) (emphasis added).

As the Brennan Center study concluded, weak enforcement of the law allows corrupting dark money to flourish. Michigan should draw a line against the dark money corruption of its ballot question process, beginning with this complaint.

## THE LEGAL AND EVIDENTIARY STANDARDS

### *The Legal Standard*

The MCFA requires an investigation of a complaint's allegations, MCL 169.215(9), in order to determine "whether or not there *may be reason to believe* that a violation" of the MCFA has occurred, *id* 169.215(10) (emphasis added); *see also* R 169.54-.56 (reciting the statutory reason to believe standard). The MCFA does not define "reason to believe" (RTB) nor has the Department promulgated an administrative rule defining that term. However, in interpreting the MCFA the Department has long looked to the Federal Election Campaign Act (FECA) and the Federal Election Commission (FEC) rules. *See, e g*, October 31, 1984 Informational Letter to David A. Lambert at 3.

The FEC defines RTB as follows:

The Act requires that the Commission find "reason to believe that a person has committed, or is about to commit, a violation" of the Act as a precondition to opening an investigation into the alleged violation. 2 U.S.C. § 437g(a)(2). A "reason to believe" finding is *not a finding that the respondent violated the Act, but instead simply means that the Commission believes a violation may have occurred.*

FEC, *Guidebook for Complainants and Respondents on the FEC Enforcement Process* 12 (2012) (emphasis added).

Thus a complaint doesn't have to prove that a violation or even a "potential" violation of the MCFA occurred, only that there "may be reason to believe" that a violation occurred.

### *The Evidentiary Standard*

The Department should not apply rigid courtroom rules of evidence at this preliminary stage. Under the Administrative Procedures Act ("APA") the rules of evidence in an administrative proceeding are that "an agency may admit and give probative effect to evidence of a type commonly relied upon by reasonably prudent [persons] in the conduct of their affairs." MCL 24.275. This standard means that the Department is "not subject to strict courtroom rules of evidence," *Rentz v General Motors*, 70 Mich App 249, 253; 245 NW2d 705 (1976), but has "wide latitude" in considering evidence, *Young v Michigan Liquor Control Comm'n*, 39 Mich App 101, 103; 197 NW2d 295 (1972) (*per curiam*). That wide latitude includes reliance on circumstantial evidence and the drawing of reasonable inferences from direct or circumstantial evidence. *See, e.g., Michigan Education Association v Secretary of State*, 241 Mich App 432, 445; 616 NW2d 234 (2000) (in resolving campaign finance complaints, the Department can rely on a circumstantial evidence and reasonable inferences).

### *The Department's Enforcement Precedents*

The facts in the Department's enforcement precedents, *D'Assandro v Home Care First, Inc. (HCFI)* and *Turnaround Detroit v Detroit Forward*, establish this guiding principle: all organizations collectively supporting a specific ballot proposal which operate under common control and funding, and which coordinate their support must comply with the MCFA's registration and reporting requirements. That principle must be applied here.

Properly understood, the principle of *HCFI* and *Detroit Forward* only requires proof *at this stage* that based on direct evidence, circumstantial evidence, *or* reasonable inferences from all the available evidence that there "may be reason to believe" that 1) the MCFA applies to MCFR and MMM because they shared a common purpose, common control, and common funding with Unlock with which they coordinated, and 2) that as a result Unlock had MCFA reporting and other obligations it failed to meet.

As demonstrated below, applying the correct legal and evidentiary standards to the facts here easily meets the threshold that there "may be reason to believe" that several MCFA violations have occurred.

### *The Lombardini Affidavit Lacks Credibility*

Finally, anticipating that the Lombardini affidavit from the previous related complaints may be relied on by the respondents here, the Department should not rely on it because it lacks credibility and evades the real factual issues.

First, that affidavit is not credible. As detailed *infra*, Lombardini is not a principal here but merely Senator Mike Shirkey's agent with a substantial business and financial interest in protecting him.

A former Republican Senate staffer, Lombardini works for Sterling which is a consultant to the Senate GOP Caucus headed by Shirkey. *See* Lombardini biography (attached as Exhibit 1); Senate Republican Campaign Committee (“SRCC”) Campaign Finance Reports. That Caucus is her largest client and Sterling’s oldest Lansing client, and Sterling has earned millions of dollars from that relationship. *See id.* For these reasons she has every strong incentive to protect her substantial financial interest in keeping Shirkey and his Caucus as clients.

Moreover, her livelihood depends on her success raising and spending the dark money at issue in this complaint. In addition to her dark money work detailed *infra*, she sits on the boards of several other dark money conduits such as the Great Lakes Job Alliance, the Great Lakes First Fund, and the Jobs for Michigan Council. *See* LARA filings. She has every incentive to protect the dark money of Shirkey, the GOP Caucus, and her other clients.

Any statements from her must be assessed against that background, sharply reducing if not destroying their credibility.

Second, the narrow, carefully couched statements in her affidavit do not rebut the allegations in this complaint. They are a non-denial denial.

For example, ¶ 5 claims that because MCFR had \$700,000 in its bank account as of December 31, 2019, “MCFR has never had the need to solicit funds for the purposes of making an expenditure to Unlock Michigan.” This statement proves nothing. Lombardini has refused to even verify the \$700,000 claim by providing a copy of MCFR’s 2019 Form 990. *See* Exhibit 2. Next, just because MCFR allegedly had enough funds on hand doesn’t mean it *didn’t* solicit funds to contribute to Unlock. Further, \$700,000 doesn’t cover the \$1.8 million MCFR has contributed so far to Unlock. *See* Unlock Campaign Finance Reports. Finally, the statement only refers to “MCFR” soliciting, omitting others doing soliciting on its behalf such as Shirkey.

Paragraph 6 is hedged with “[t]o the best of my knowledge” MCFR hasn’t made solicitations. Why the equivocation, especially since Lombardini claims to be MCFR’s President with knowledge of all its operations, *see* ¶¶ 2-4? And again, that paragraph is carefully restricted to MCFR leaving no denial that others like Shirkey are doing exactly as this complaint alleges.

The Lombardini Affidavit is neither credible nor responsive to the issues here.

## FACTS

### THE DARK MONEY ENTERPRISE OF SENATOR MIKE SHIRKEY CREATED, FUNDS, AND CONTROLS UNLOCK MICHIGAN

Building on a decade of dark money fundraising and spending by his predecessors as Senate Majority Leaders, Shirkey controls and has expanded one of Michigan’s largest dark money enterprises, an enterprise which created, controls, coordinates with, and funds Unlock Michigan.

I. *Shirkey Supports Repeal of 1945 PA 302 Legislatively and Through Unlock*

Shirkey has been an early, strong, and persistent supporter of repealing the law granting the Governor emergency powers, 1945 PA 302. He voted to repeal it in April 2020. *See* April 24, 2020 Journal of the Senate 519 (SB 857). When that legislation stalled in the House he supported the petition drive of Unlock which he has promoted:

It's been an amazing and inspiring response to have all the people requesting signatures for the petition drive the citizen initiative to repeal the 1945 law. And now we need everybody to follow through. Get those signatures and get those petitions sent in. Time is of the essence. We have relatively short window to accomplish this goal by. But I'm strongly encouraged by the inspiring response to all those folks that have asked for petitions. I've seen evidence of them being out in public, holding signature gathering events. And now we need them to complete those petitions and get them sent in, so we can start the certification process and be ready to present it to the legislature in the fall.

Standupmichigan.com. He has said that the petition drive is "probably the No. 1 priority right now." Wheeler, *How Right Wing Groups Created an Atmosphere in which Kidnapping the Michigan Governor Made Sense*, In These Times (Nov. 1, 2020) at 4.

Shirkey has put his money behind his words. As described *infra* the Shirkey-controlled dark money entities MCFR and MMM have collectively directly contributed \$2.4 million to Unlock, or 86% of its direct contributions. *See* Unlock Campaign Finance Reports. This has been supplemented by over \$100,000 of in-kind contributions. *See id.*

But for the funding from Shirkey's MCFR and MMM the Unlock petition drive never would have occurred.

II. *Shirkey Political Lieutenant Fred Wszolek Created and Runs Unlock Michigan for Shirkey*

When the attempt to repeal 1945 PA 302 stalled in the Legislature, Shirkey took matters into his own hands by having his political lieutenant create and run Unlock Michigan. Fred Wszolek ("Wszolek") has done political work for the Senate GOP since 1990. Now a political lieutenant of Shirkey's and part of his inner circle, Wszolek created and runs Unlock for Shirkey.

Wszolek has decades of history working for the Senate GOP Caucus. In the 1990 cycle Wszolek was lead strategist and ad maker at the GOP firm Marketing Resource Group and chief outside strategist for the SRCC. In the 1994 cycle, he was the Senate Majority Communications Director and also served as executive director to the SRCC. In the 1998 cycle, Wszolek was the chief outside strategist, ad maker, and mail vendor for the SRCC. In the 2002 cycle he worked for Sterling as a vendor to the SRCC. In the 2006 cycle Wszolek was a SRCC vendor and handled independent expenditures and issue ads in Senate elections for the Michigan GOP. During the 2010 and 2014 cycles Wszolek played no role in Senate elections because the controlling vendor

was Sterling as described earlier. *See* Affidavit of Jeff Timmer ¶ 9 (“Timmer Affidavit”).

However, Wszolek staged a comeback in 2018, advising Shirkey through his company StrategyWorks. *See* Committee to Elect Mike Shirkey Campaign Finance Reports. Wszolek has since been part of Shirkey’s inner circle, one of his top political lieutenants, and created and runs Unlock for him. *See, e.g., Filing Claims Shirkey Used Dark Money to Fund Unlock Michigan*, MIRS Capitol Capule, April 29, 2021 at 5 (“Wszolek said he controls Unlock Michigan”); WJR, September 29, 2020 Paul W. Smith Show, *Interview with Unlock Michigan Founder Fred Wszolek*; Timmer Affidavit ¶ 10. Wszolek is paid by Unlock through his firm Campaign Works LLC. *See* Unlock Campaign Finance Reports.

Further confirming Shirkey’s control of Unlock is that many of its vendors are also SRCC vendors such as Pridnia Design, Diligent Vision, Eric Doster, Generation Strategies, and Templar Baker. *See* Unlock and SRCC Campaign Finance Reports; Timmer Affidavit ¶ 11.

III. *Shirkey-Controlled Michigan Citizens for Fiscal Responsibility Raises Funds for Unlock Michigan*

A. *Michigan Citizens for Fiscal Responsibility Was Spawned 11 Years Ago and Has Served the Senate Republican Caucus by Raising, Transferring, and Spending Dark Money*

Sterling Corporation (“Sterling”) was started in 2000 as a Lansing-based Republican public affairs, political, and fundraising firm and Jeff Timmer was an employee of Sterling beginning in 2000. Timmer Affidavit ¶ 2. Between 2000 and 2010 Sterling did extensive work for Senate GOP candidates, *see, e.g.,* Campaign Finance Reports of Gilbert, Kahn, Papageorge, Sanborn, Sikkema, Stamas, and Toy, as well as for the Senate Republican Campaign Committee, *see* SRCC Campaign Finance Reports.

By 2009, Timmer had become a partner and co-owner of Sterling with Steve Linder. Timmer Affidavit ¶ 2. In 2010 Linder and Timmer planned to make Sterling the one-stop shop for all of the Senate GOP Caucus’ political and communication needs. *Id.* ¶ 3. They created MCFR as a nonprofit corporation in 2010 operating as a social welfare organization under IRC 501(c)(4). *Id.* ¶ 4. A 501(c)(4) like MCFR is not required to publicly disclose its donors and thus provides a perfect vehicle to raise and spend dark money. Linder and Timmer used MCFR to aid Senator Randy Richardville in his quest to become Senate Majority Leader. *Id.* ¶ 5. To that end, MCFR was used in the fall 2010 Senate elections to support GOP candidates through issue ads. *Id.*

The plan succeeded. When Richardville became Senate Majority Leader in 2011, Sterling became the principal consultant to the SRCC with substantial monthly retainers. *See* SRCC Campaign Finance Reports; Timmer Affidavit ¶ 6. When an independent expenditure committee was formed in the wake of *Citizens United v FEC*, 558 US 310; 130 S Ct 876; 175 LEd 2d 753 (2010), to make independent expenditures in Senate races, Sterling became its consultant as well with a large monthly retainer. *See* Senate Majority PAC Campaign Finance Reports. This close working relationship between Sterling and the Senate GOP Caucus has continued to this day through successive Senate Majority Leaders – Richardville, then Meekhof, and now Shirkey. *See*

SRCC Campaign Finance Reports; Timmer Affidavit ¶ 8; Affidavit of Robert LaBrant ¶ 6 (“LaBrant Affidavit”).<sup>2</sup>

Since 2010, MCFR has been controlled by Sterling, which in turn answers to the GOP Senate Majority Leader and is used to advance the political goals of the GOP Senate Majority Leader. From 2010-13 two of MCFR’s 3 directors were Linder, a Sterling partner and co-owner, and Timmer. *See* 2010-13 MCFR Annual Reports. In 2012, LaBrant became an employee of Sterling and succeeded Timmer as a director of MCFR in 2014. LaBrant Affidavit ¶ 7; 2014 MCFR Annual Report; 2016 MCFR IRS Form 990, Schedule O.<sup>3</sup> Beginning in 2015, all 3 directors were either an owner or employee of Sterling. *See id.* LaBrant remained a Sterling employee and MCFR director until 2017. *See* MCFR Annual Reports 2014-19. In 2018-19, at least 2 of the 3 MCFR directors were Sterling employees. *See* MCFR Annual Reports 2018-17. The non-Sterling director in 2018, Brad Pischea, was a Senate GOP staffer. Timmer Affidavit ¶ 14. In 2020, 3 Sterling employees and Paul Cordes, a former Sterling director, were MCFR’s directors. *See* MCFR Annual Report 2020. Sterling and MCFR overlap and interlock, being all but indistinguishable.

Thus from August, 2010 to the present MCFR has been controlled by Sterling and used to pursue the political goals of Sterling’s clients, the GOP Senate Majority Leader and his Caucus.

B. *MCFR Has Raised and Transferred Millions of Dollars in Dark Money Since 2010*

Even though its 501(c)(4) status was intended to hide its financial activity, complaints about MCFR’s illegal conduct as well as other sources reveal that it has raised and transferred millions of dollars in dark money to other entities just as it’s done with Unlock. In other words, MCFR has long engaged in a pattern of activity identical to that alleged in this complaint: raising dark money in order to donate/contribute/transfer them to another entity to advance the goals of the Senate GOP Majority Leader.

In 2019 Americans for Job Security (“AJS”) as part of the settlement of a FEC complaint in MUR 6538R disclosed previously secret contributions from MCFR to AJS of at least \$1.123 million between 2010 and 2012. *See* October 23, 2019 FEC Disclosure Letter (attached as Exhibit 3).

In 2016 Citizens for Responsibility and Ethics in Washington (“CREW”) filed a complaint with the IRS alleging that MCFR had failed to disclose \$290,000 in contributions to 2 PAC’s in 2014. *See* June 15, 2016 CREW Complaint (attached together with explanatory materials as Exhibit 4). The complaint revealed that a web of organizations centered on Sterling and MCFR moved millions of dollars between them during 2010-14. *See* Summary of Complaint (attached as part of Exhibit 4). This money secretly funded so-called “issue ads” Michigan Senate races in

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<sup>2</sup> In 2014, Lambert Edwards acquired Sterling. We will continue to refer to it as Sterling.

<sup>3</sup> LaBrant and Timmer had long known each other and previously worked together on behalf of Republican interests. For example, LaBrant as President of another dark money 501(c)(4), the Michigan Redistricting Resource Institute (MRRI), hired Sterling and Timmer starting in 2009 to gerrymander the congressional districts adopted in 2011 to favor the GOP. *See League of Women Voters of Michigan v Benson*, 373 F Supp 3d 867, 883-92 & nn 6, 7 (ED Mich 2019) (3-judge court), *vacated on jurisdictional grounds*, 589 US \_\_\_\_ (2019).

2010 and 2014, *see id.*, the purpose for which MCFR was being used. Timmer Affidavit ¶¶ 5, 7.

MCFR has continued to raise and transfer millions of dollars to other organizations. From 2016 through 2018, it “granted” or contributed nearly \$2 million to other organizations. *See* 2016-18 MCFR IRS Form 990’s; *see also* Michigan Campaign Finance Network, *How Millions of Dollars In Dark Money Poured Into State Races in 2018* (Nov. 16, 2018) (describing MCFR spending in 2018).

Thus, based on the limited available public information since its creation in 2010 MCFR has raised and transferred to other organizations at least \$3.2 million in dark money and that was *before* it contributed nearly \$2 million, so far, to Unlock. *See* Unlock Campaign Finance Reports; Mauger, *Mystery money fuels campaign to limit Whitmer’s emergency powers*, Detroit News (July 27, 2020).

Plainly, MCFR was established and has been operated for the purpose of raising millions of dollars in dark money to transfer/donate/contribute to other organizations to advance the political interests of Senate Republicans and their leaders such as Shirkey. The raising and transfer of MCFR funds to Unlock is consistent with the way MCFR has done business for 11 years.

IV. *Shirkey Creates, Controls, Funds, and Contributes Money From Michigan! My Michigan! to Unlock*

Not satisfied with the dark money he has raised for and spent through MCFR, in 2018 Shirkey expanded his dark money fiefdom when he created Michigan! My Michigan! (“MMM”) also housed at and controlled by Sterling. *See* Mauger, *Shirkey-tied nonprofit gives \$550,000 to Unlock Michigan campaign*, Detroit News (Feb. 1, 2021). A majority of MMM’s board members are Sterling employees who also serve on the MCFR board, creating 3 overlapping, interlocking organizations. *See* 2020 Annual Reports of MCFR and MMM.

Shirkey has raised money for MMM, *see* Oct. 23, 2019 fundraiser solicitation (attached as Exhibit 5). MMM has contributed at least \$550,000 to Unlock so far and is its second largest donor behind only MCFR. *See* Mauger, *supra*; Unlock Campaign Finance Reports.<sup>4</sup>

V. *The Activities of MCFR, MMM, and Unlock Demonstrate Coordination*

The common control and funding of MCFR, MMM, and Unlock by Shirkey through Sterling and Wszolek has been demonstrated in Parts I-IV. Sterling, which answers to Shirkey, controls and interlocks with MMM and MCFR. Shirkey not only controls those entities through Sterling, but funds them as well. Through Shirkey’s agent Wszolek, Unlock was created and operates with Shirkey providing nearly 86% of its funding through MCFR and MMM.

Beyond common control and funding, the 3 entities – MCFR, MMM, and Unlock – have been coordinating their activities as would be expected of groups under common control with

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<sup>4</sup> Sterling is also home to Secure MI Vote which is advancing another part of Shirkey’s agenda, voter suppression. *See* Secure MI Vote Campaign Finance Reports; Mauger, *Michigan GOP leader reveals plans to go around Whitmer for voting law overhaul*, Detroit News (March 26, 2021).

common funding pursuing a common goal.

For example, the contributions from MCFR and MMM to Unlock are not random – there is a clear pattern of MCFR/MMM moving sufficient funds to Unlock in time to make the large payments owed to the paid signature firm, National Petition Management (NPM). NPM requires a large up-front deposit before collecting signatures. LaBrant Affidavit ¶ 9; Timmer Affidavit ¶ 13. Unlock paid that \$300,000 deposit on June 25, 2020 with funds transferred *the day before* from MCFR. NPM also requires large periodic payments as it collects signatures. *Id.* To satisfy that need the pattern continued throughout the petition drive – MCFR/MMM moving funds when they were needed to pay NPM. Many times those movements of funds occurred the day before or day of the payment to NPM:

<u>MCFR/MMM Contributions to Unlock</u>			<u>Petition Vendor Payments</u>		
6/9	MCFR	\$10,000			
6/18	MCFR	\$150,000			
6/24	MCFR	\$400,000			
			6/25	NPM	\$300,000 (deposit)
7/20	MCFR	\$100,000			
			7/21	NPM	\$100,276
7/31	MCFR	\$35,000			
			7/31	NPM	\$100,000
			8/3	NPM	\$45,000
8/6	MCFR	\$150,000			
8/6	MMM	\$100,000	8/6	NPM	\$229,000
8/14	MCFR	\$25,000			
8/20	MMM	\$100,000			
8/21	MMM	\$100,000			
8/21	MCFR	\$110,000	8/21	NPM	\$330,000
8/27	MCFR	\$700,000			
			8/28	NPM	\$166,000
			8/31	NPM	\$160,000
			9/11	NPM	\$183,000
			9/18	NPM	\$150,000
10/1	MCFR	\$100,000			
10/1	MMM	\$150,000			
			10/5	NPM	\$218,000
10/21	MMM	\$100,000			

This pattern is no accident. Plainly, the movement of funds to Unlock from MCFR/MMM was coordinated to meet the payment requirements of the largest Unlock expenditure – paid signature collection by NPM.

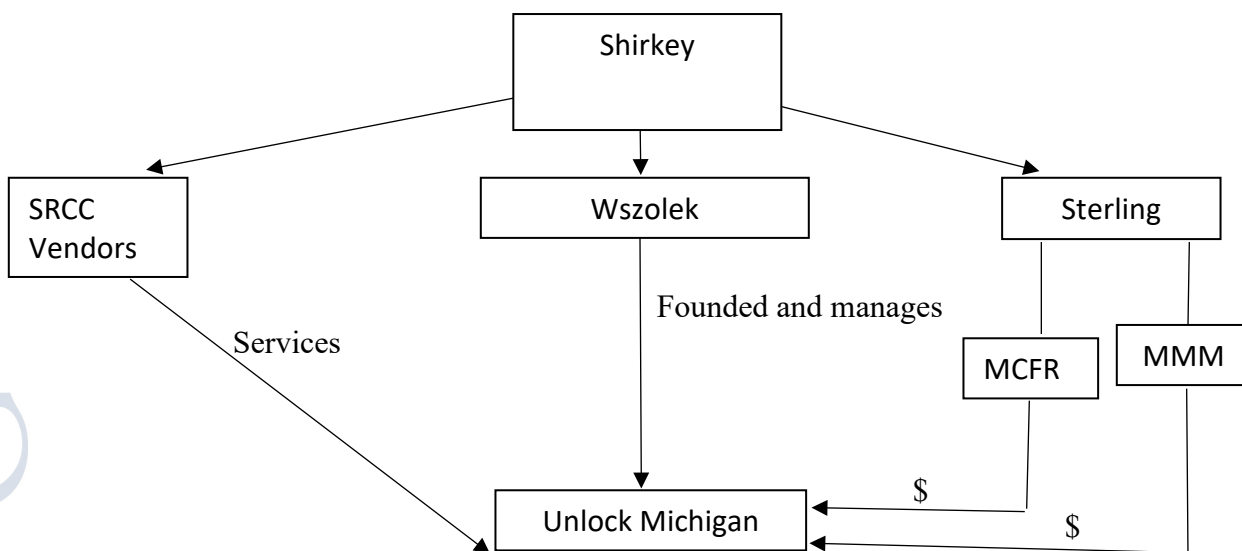
The coordination has continued. In January 2021, Unlock had MCFR directly pay nearly \$85,000 of its legal bills, reported as in-kind contributions on the April, 2021 report of Unlock. Such payments take active collaboration – MCFR wouldn't have known the legal bills existed unless Unlock disclosed and MCFR offered, or more likely was ordered by Shirkey, to pay them.

Finally, further demonstrating the integration of all these organizations. Unlock Michigan formed a Super PAC in September, 2020 housed, of course, at Sterling whose treasurer is, no surprise, Heather Lombardini. *See* Unlock Michigan Action Fund Statement of Organization. That Super PAC also contributed to Unlock. *See* Unlock 2020 Annual Report.

These interlocking organizations, all controlled and funded by Shirkey have been coordinating before, during, and after the Unlock petition drive.

**CONCLUSION AND RELIEF SOUGHT: THERE IS REASON TO BELIEVE THAT MCFR, MMM, AND UNLOCK MAY HAVE VIOLATED THE MCFA**

This complaint need only demonstrate that there “may be reason to believe” violations of the MCFA have occurred based on the relaxed evidentiary standards of the APA. This threshold is easily met. Started and run by his lieutenant, funded with his dark money, and served by his vendors, Shirkey has added Unlock to his stable of controlled organizations pursuing his political goal of repealing 1945 PA 302. For all practical purposes MCFR, MMM, and Unlock are a single organization funded by Shirkey and controlled by Shirkey through his agents, Wszolek and Sterling:



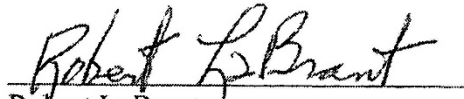
For all these reasons, I request that you:

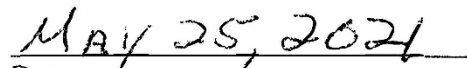
1) Find that there may be reason to believe that Michigan Citizens for Fiscal Responsibility, Michigan! My Michigan!, and Unlock Michigan violated the MCFA including but not limited to MCL 169.215(15), 169.221(12), 169.224(2)(c), 169.224(2)(f), 169.234, and 169.241(3);

2) Conduct an investigation of MCFR and MMM by obtaining their bank records and records of contribution solicitations, and a list of donors to them by name, amount, and date since June 1, 2020; and

3) Take any further necessary steps to punish MCFR, MMM, and Unlock Michigan for their violations of the MCFA.

*I certify that to the best of my knowledge, information, and belief, formed after a reasonable inquiry under the circumstances, each factual contention of this complaint is supported by evidence.*

  
Robert LaBrant

  
Date

## Exhibits

- 1) Lombardini bio
- 2) Lombardini email requesting MCFR 2019 Form 990
- 3) FEC disclosure in MUR 6538R
- 4) CREW complaint
- 5) MMM FR solutions

# **EXHIBIT 1**

## HEATHER LOMBARDINI

**President & Managing Partner -  
Public Affairs Division**

Heather is president and managing partner of Lambert's Lansing, Mich.-based political consulting arm. She leads a team focused on issue advocacy, campaign strategy, donor relations and PAC solicitation. Her immense knowledge of political fundraising strategies and her relationships with legislators and business leaders throughout the state have fueled Sterling's growth, campaign wins and state fundraising records. Heather's leadership and expansive network allowed the company to outraise all other state capitol caucuses in the most recent midterm elections and maintain a GOP majority for the Michigan Senate. Her work also extends to national consulting and fundraising for issues and coalitions ranging from energy and environmental causes to Chamber and business



## MENU



## CONTACT

advocacy, automotive and technology initiatives and education and non-profit issue management.

Before coming to Lambert, Heather worked for the Michigan Senate Republicans as well as the Michigan House Republicans where she served in staff leadership as Legislative Director for a former Speaker, and as Member Finance Director. Among Heather's proudest achievements include helping maintain a Republican majority in the state House, as well as her legislative work on the Detroit water and sewage system and the Merit Scholarship Award. Heather has been a GOP volunteer and an elected Precinct Delegate for most of her adult life. She serves as a volunteer for the American Red Cross, and also does extensive pro-bono work for conservative political candidates and non-profit organizations.

Heather received her bachelor's degree from Aquinas College, earning a double major in political science and communications and a minor in biology. She also holds a master's degree in

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public administration from Western  
Michigan University.

## FUN FACT

Heather has over 700 pairs of  
shoes.

|||  
MENU

## EMAIL SIGNUP

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GRAND RAPIDS

// LANSING

// DETROIT

// NEW

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CONTACT

Let's start a conversation.



# **EXHIBIT 2**

## Mark Brewer

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**From:** Mark Brewer  
**Sent:** Wednesday, April 21, 2021 12:57 PM  
**To:** 'hlombardini@lambert.com'  
**Subject:** Michigan Citizens for Fiscal Responsibility 2019 IRS Form 990

This is to request a copy of the above. Please either email it to me or advise how a paper copy can be picked up. Thank you.

*Mark Brewer*

Mark Brewer  
Attorney  
Goodman Acker P.C.  
17000 West Ten Mile, Second Floor  
Southfield, Michigan 48075  
[MBrewer@goodmanacker.com](mailto:MBrewer@goodmanacker.com)

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# **EXHIBIT 3**

October 23, 2019

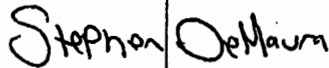
Jonathan A. Peterson  
Office of General Counsel  
Federal Election Commission  
1050 First Street NE  
Washington, DC 20463

Dear Mr. Peterson:

Pursuant to the conciliation agreement in MUR 6538R in the matters of Americans for Job Security please find enclosed the agreed upon financial records.

I have used my best efforts to create an accurate picture of the Organization's finance during the period in question. We utilized bank records, spreadsheets, and other records. It is likely that there are numerous duplicate receipts and expenditures within the documents.

Sincerely,

A handwritten signature in black ink that reads "Stephen DeMaura". The signature is written in a cursive, slightly stylized font.

Stephen DeMaura

Date	Name	Address	City	State	Zip	Income	Batch Deposits	Notes
1/4/10	Workforce Fairness Institute	PO Box 25518	Alexandria	VA	22313	\$ 500,000.00		
1/28/10	Undelineated deposit. Potentially duplicative						\$ 1,654.00	
2/23/10	Undelineated deposit. Potentially duplicative						\$ 175,000.00	
4/5/10	Undelineated deposit. Potentially duplicative						\$ 48.71	
4/6/10	Hensel Phelps Construction	420 Sixth Avenue	Greeley	CO	80631	\$ 650,000.00		
4/15/10	Undelineated deposit. Potentially duplicative						\$ 198.00	
5/10/10	Michigan Citizens for Fiscal Responsibility	12 E. Allegan St, Suite 700	Lansing	MI	48933	\$ 155,000.00		
5/16/10	Americans for Limited Government	9900 Main St, Suite 303	Fairfax	VA		\$ 60,000.00		
6/3/10	Legislative Education Action Drive	9900 Main St, Suite 303	Fairfax	VA		\$ 10,000.00		
6/15/10	Hensel Phelps Construction	420 Sixth Avenue	Greeley	CO	80631	\$ 1,950,000.00		
6/25/10	Michigan Citizens for Fiscal Responsibility	12 E. Allegan St, Suite 700	Lansing	MI	48933	\$ 33,000.00		
7/7/10	Michigan Citizens for Fiscal Responsibility	12 E. Allegan St, Suite 700	Lansing	MI	48933	\$ 120,000.00		
7/8/10	Undelineated deposit. Potentially duplicative						\$ 15,000.00	
7/12/10	Michigan Citizens for Fiscal Responsibility	12 E. Allegan St, Suite 700	Lansing	MI	48933	\$ 390,000.00		
7/16/10	Undelineated deposit. Potentially duplicative						\$ 21,760.00	
7/22/10	Undelineated deposit. Potentially duplicative						\$ 50,000.00	
8/2/10	Hensel Phelps Construction	420 Sixth Avenue	Greeley	CO	80631	\$ 330,000.00		
8/6/10	Undelineated deposit. Potentially duplicative						\$ 9,200.00	
8/6/10	Undelineated deposit. Potentially duplicative						\$ 10,000.00	
8/16/10	Wellspring Committee	902 Nelson Lane	Manassas	VA	20110	\$ 150,000.00		
8/20/10	Wellspring Committee	902 Nelson Lane	Manassas	VA	20110	\$ 35,000.00		
8/23/10	Yates Petroleum Corporation	105 S. 4th St.	Artesia	NM	88210	\$ 15,000.00		
8/23/10	Undelineated deposit. Potentially duplicative						\$ 25.00	
8/23/10	Undelineated deposit. Potentially duplicative						\$ 20.00	
8/23/10	Undelineated deposit. Potentially duplicative						\$ 20.00	
8/23/10	Undelineated deposit. Potentially duplicative						\$ 20.00	
8/23/10	Undelineated deposit. Potentially duplicative						\$ 50.00	
8/23/10	Undelineated deposit. Potentially duplicative						\$ 20.00	
8/23/10	Undelineated deposit. Potentially duplicative						\$ 7,500.00	
8/23/10	Undelineated deposit. Potentially duplicative						\$ 100.00	
8/23/10	Undelineated deposit. Potentially duplicative						\$ 2,500.00	
8/24/10	Center to Protect Patient Rights	20118 N. 67th Ave, Suite 300		AZ	85308	\$ 1,000,000.00		
8/24/10	Wellspring Committee	902 Nelson Lane	Manassas	VA	20110	\$ 56,098.00		
8/26/10	Center to Protect Patient Rights	20118 N. 67th Ave, Suite 300		AZ	85308	\$ 2,000,000.00		
8/27/10	ME-TEX Oil and Gas, Inc.	119 E. Bender Blvd	Hobbs	NM	88240	\$ 10,000.00		
8/27/10	Strata Production Company	1301 N. Sycamore Ave	Rosewell	NM	88201	\$ 5,000.00		
8/30/10	Peyton Yates	PO Box 1344	Artesia	NM	88211	\$ 3,000.00		
8/31/10	Center to Protect Patient Rights	20118 N. 67th Ave, Suite 300		AZ	85308	\$ 400,000.00		
8/31/10	Undelineated deposit. Potentially duplicative						\$ 50,000.00	
9/2/10	Mack Energy Corporation	PO Box 960	Artesia	NM		\$ 2,500.00		
9/2/10	Wellspring Committee	902 Nelson Lane	Manassas	VA	20110	\$ 105,000.00		
9/3/10	Center to Protect Patient Rights	20118 N. 67th Ave, Suite 300		AZ	85308	\$ 600,000.00		
9/3/10	Henry Resources, LLC	3525 Andrew Highway	Midland			\$ 7,500.00		
9/8/10	Center to Protect Patient Rights	20118 N. 67th Ave, Suite 300		AZ	85308	\$ 50,000.00		
9/9/10	Undelineated deposit. Potentially duplicative						\$ 2,500.00	
9/14/10	Nixon Peabody LLP	PO Box 31051	Rochester	NY	14603	\$ 15,000.00		
9/15/10	Undelineated deposit. Potentially duplicative						\$ 250,000.00	
9/28/10	Center to Protect Patient Rights	20118 N. 67th Ave, Suite 300		AZ	85308	\$ 500,000.00		
10/18/10	Workforce Fairness Institute	PO Box 25518	Alexandria	VA	22313	\$ 1,000,000.00		
10/19/10	Undelineated deposit. Potentially duplicative						\$ 10,000.00	
10/26/10	Mentzer Media Services	600 Fairmount Ave	Towson	MD	21204	\$ 321,562.00		
12/3/10	Nixon Peabody LLP	PO Box 31051	Rochester	NY	14603	\$ 3,325.00		
12/6/10	Center to Protect Patient Rights	20118 N. 67th Ave, Suite 300		AZ	85308	\$ 28,000.00		
12/14/10	Undelineated deposit. Potentially duplicative						\$ 20.00	
12/14/10	Undelineated deposit. Potentially duplicative						\$ 50.00	
12/14/10	Undelineated deposit. Potentially duplicative						\$ 25.00	
12/14/10	Undelineated deposit. Potentially duplicative						\$ 25.00	
12/14/10	Undelineated deposit. Potentially duplicative						\$ 50.00	
12/14/10	Undelineated deposit. Potentially duplicative						\$ 15.00	
12/14/10	Undelineated deposit. Potentially duplicative						\$ 875.00	
2/11/11	DCI Group, LLC	1828 L St.	Washington	DC	20036	\$ 8,500.00		
3/22/11	Retail Industry Leaders Association	1700 N. Moore	Arlington	VA		\$ 661,000.00		
3/25/11	Retail Industry Leaders Association	1700 N. Moore	Arlington	VA		\$ 700,000.00		
4/15/11	Undelineated deposit. Potentially duplicative						\$ 167,667.50	
4/29/11	Undelineated deposit. Potentially duplicative						\$ 20,000.00	
5/2/11	Undelineated deposit. Potentially duplicative						\$ 10,000.00	
5/2/11	Undelineated deposit. Potentially duplicative						\$ 500,000.00	
5/20/11	WT Offshore Inc.	9 Greenway Plz, Suite 300	Houston	TX	77046	\$ 25,000.00		
5/20/11	Undelineated deposit. Potentially duplicative						\$ 5,000.00	
5/20/11	Undelineated deposit. Potentially duplicative						\$ 10,000.00	
5/20/11	Undelineated deposit. Potentially duplicative						\$ 250,000.00	
5/23/11	Crow Holdings	3819 Maple				\$ 50,000.00		
5/24/11	Undelineated deposit. Potentially duplicative						\$ 25,000.00	
6/14/11	Undelineated deposit. Potentially duplicative						\$ 25,000.00	
6/15/11	Undelineated deposit. Potentially duplicative						\$ 10,075.69	
6/15/11	Undelineated deposit. Potentially duplicative						\$ 10,000.00	
7/7/11	Center to Protect Patient Rights	20118 N. 67th Ave, Suite 300		AZ	85308	\$ 7,000.00		
7/18/11	Center to Protect Patient Rights	20118 N. 67th Ave, Suite 300		AZ	85308	\$ 10,000.00		
7/27/11	Undelineated deposit. Potentially duplicative						\$ 2,786.66	
10/12/11	Undelineated deposit. Potentially duplicative						\$ 4,000.00	
11/9/11	Undelineated deposit. Potentially duplicative						\$ 67,025.12	
11/14/11	Undelineated deposit. Potentially duplicative						\$ 8,000.00	
12/13/11	Undelineated deposit. Potentially duplicative						\$ 25,000.00	
12/13/11	Undelineated deposit. Potentially duplicative						\$ 12,000.00	
12/13/11	Undelineated deposit. Potentially duplicative						\$ 10,000.00	
12/16/11	DCI Group, LLC	1828 L St.	Washington	DC	20036	\$ 5,000.00		

1/11/12	Undelineated deposit. Potentially duplicative						\$	61,000.00	
1/20/12	Undelineated deposit. Potentially duplicative						\$	582.00	
1/24/12	DCI Group, LLC	1828 L St.	Washington DC	20036	\$	43,000.00			
3/21/12	Fair Oaks Finance	103 Bedford Street	Hamilton MT	59840	\$	500,000.00			
3/28/12	Andrew Barth	2200 Chaucer Road	San Marino CA	91108	\$	25,000.00			
3/28/12	Fred Sands	11611 San Vicente Blvd, Suite 1000	Los Angeles CA	90049	\$	15,000.00			
3/28/12	Undelineated deposit. Potentially duplicative						\$	15,000.00	
4/2/12	Undelineated deposit. Potentially duplicative						\$	500,000.00	
4/2/12	Undelineated deposit. Potentially duplicative						\$	25,000.00	
4/2/12	Undelineated deposit. Potentially duplicative						\$	25,000.00	
4/3/12	ADP	1 ADP Boulevard	Roseland NJ	7068	\$	3,555.41			Reimbursement
4/12/12	Tracinda Corporation	150 S. Rodeo Drive	Beverly Hills CA	90212	\$	100,000.00			
4/13/12	Molina Healthcare	200 Oceangate, Suite 100	Long Beach CA	90802	\$	25,000.00			
4/25/12	Undelineated deposit. Potentially duplicative						\$	100,000.00	
5/1/12	Devon Energy	333 W. Sheridan Ave.	Oklahoma City OK	73102	\$	1,000,000.00			
5/1/12	Devon Energy Production Corp.	20 North Broadway	Oklahoma City OK		\$	1,000,000.00			
5/2/12	DCI Group, LLC	1828 L St.	Washington DC	20036	\$	5,000.00			
5/4/12	Center to Protect Patient Rights	20118 N. 67th Ave, Suite 300	AZ	85308	\$	50,000.00			
5/4/12	Undelineated deposit. Potentially duplicative						\$	47,303.14	
5/7/12	Undelineated deposit. Potentially duplicative						\$	10,000.00	
5/7/12	Undelineated deposit. Potentially duplicative						\$	13,250.00	
5/8/12	Fred Sands	11611 San Vicente Blvd, Suite 1000	Los Angeles CA	90049	\$	30,000.00			
5/8/12	William Bloomfield Jr.	940 1st Street	Manhattan B. CA	90266	\$	100,000.00			
5/8/12	Undelineated deposit. Potentially duplicative						\$	151.95	
5/9/12	ADP	1 ADP Boulevard	Roseland NJ	7068	\$	63.77			Reimbursement
5/9/12	G.H. Palmer Associates	11740 San Vicente Blvd, Suite 208	Los Angeles CA	90049	\$	350,000.00			
5/9/12	Geoffrey H. Palmer	11740 San Vicente Blvd, Suite 208	Los Angeles CA	90049	\$	350,000.00			
5/11/12	Undelineated deposit. Potentially duplicative						\$	130,000.00	
5/11/12	Undelineated deposit. Potentially duplicative						\$	2,634.00	
5/11/12	Undelineated deposit. Potentially duplicative						\$	7,225.00	
5/29/12	Bass Pro Inc.	2500 E. Kearney	Springfield MO	65898	\$	50,000.00			
5/29/12	Geoffrey H. Palmer	11740 San Vicente Blvd, Suite 208	Los Angeles CA	90049	\$	250,000.00			
5/29/12	John Morris	2500 E. Kearney	Springfield MO	65803	\$	50,000.00			
6/4/12	Undelineated deposit. Potentially duplicative						\$	10,000.00	
6/5/12	John Phelps	1100 S. Orlando Avenue	Maitland FL	32751	\$	50,000.00			
6/6/12	DCI Group, LLC	1828 L St.	Washington DC	20036	\$	150,000.00			
6/12/12	Undelineated deposit. Potentially duplicative						\$	190,000.00	
6/15/12	Peter Thiel				\$	500,000.00			
6/15/12	Richard & Helen Davos	50 S. La Salle Street	Chicago IL	60604	\$	1,000,000.00			
6/20/12	Robert Rodriguez	PO Box 227	Zephyr Cove NV	89448	\$	100,000.00			
6/20/12	U.S. Sugar Corp	111 Ponce de Leon Avenue	Clewiston FL	33440	\$	500,000.00			
6/26/12	Steven Romick	355 N. Salt Lake Ave	Los Angeles CA	90049	\$	100,000.00			
6/28/12	DCI Group, LLC	1828 L St.	Washington DC	20036	\$	70,000.00			
6/28/12	Donald and Jette Laws	34 N. Portola Road	Laguna Beach CA	92651	\$	50,000.00			
6/29/12	James Heavener	3300 University Boulevard	Winter Park FL	32792	\$	25,000.00			
6/29/12	Richard Atwood		Whittier CA	90605	\$	100,000.00			
6/29/12	The Business Bank	133 Maple Avenue East	Vienna VA	22180	\$	488.45			Interest
7/3/12	Undelineated deposit. Potentially duplicative						\$	125,000.00	
7/3/12	Undelineated deposit. Potentially duplicative						\$	250,000.00	
7/5/12	Glenn Stearns	4 Hutton Centre Drive, 10th Floor	Santa Ana CA	92707	\$	150,000.00			
7/5/12	John J. Fisher	110 Pacific Avenue, Suite 147	San Francisco CA	94111	\$	300,000.00			
7/5/12	Margaret Bloomfield	1262 Corsica Dr.	Pacific Palisades CA	90272	\$	500,000.00			
7/9/12	Undelineated deposit. Potentially duplicative						\$	950,000.00	
7/10/12	Penn National Gaming	825 Berkshire Blvd	Wyomissing PA	19610	\$	136,000.00			
7/13/12	The Business Bank	133 Maple Avenue East	Vienna VA	22180	\$	553.05			Interest
7/15/12	Stephen Chazen	PO Box 427	Pacific Palisades CA	90272	\$	150,000.00			
7/16/12	Anthony Pritzker	11111 Santa Monica Blvd., #1650	Los Angeles CA	90025	\$	100,000.00			
7/16/12	Gary Wilson	31528 Victoria Point Road	Malibu CA	90265	\$	25,000.00			
7/16/12	J. Mark Grosvenor Foundation	6355 Ward Road, Suite 301	Arvada CO	80004	\$	10,000.00			
7/16/12	Michael Tennenbaum	2951 28th Street, Suite 1000	Santa Monica CA	90405	\$	3,000.00			
7/19/12	Penn National Gaming	825 Berkshire Blvd	Wyomissing PA	19610	\$	130,000.00			
7/20/12	Undelineated deposit. Potentially duplicative						\$	160,000.00	
7/20/12	Undelineated deposit. Potentially duplicative						\$	648,000.00	
7/24/12	Undelineated deposit. Potentially duplicative						\$	150,000.00	
7/25/12	Penn National Gaming	825 Berkshire Blvd	Wyomissing PA	19610	\$	471,000.00			
7/26/12	Undelineated deposit. Potentially duplicative						\$	215,000.00	
7/27/12	Mike and Mary Sue Shannon	2323 North Mayfair Road	Milwaukee WI	53226	\$	100,000.00			
7/30/12	California American Council of Engineering Companies	1303 J Street, Suite 450	Sacramento CA	95814	\$	150,000.00			
7/31/12	The Business Bank	133 Maple Avenue East	Vienna VA	22180	\$	1,022.75			Interest
8/1/12	Undelineated deposit. Potentially duplicative						\$	250,000.00	
8/6/12	Edward Czuker	270 N. Canon Drive, 2nd Floor	Beverly Hills CA	90210	\$	250,000.00			
8/6/12	Frank and Mary Walsh	3392 Barrow Island Road	Jupiter FL	33477	\$	100,000.00			
8/6/12	Larry Ruvo	8400 So. Jones Boulevard	Las Vegas NV	89139	\$	50,000.00			
8/7/12	Charles Schwabb	PO Box 192861	San Francisco CA	94119	\$	100,000.00			
8/7/12	Charles Schwabb	PO Box 192861	San Francisco CA	94119	\$	250,000.00			
8/7/12	Devon Energy	333 W. Sheridan Ave.	Oklahoma City OK	73102	\$	500,000.00			
8/8/12	DCI Group, LLC	1828 L St.	Washington DC	20036	\$	291,500.00			
8/8/12	Devon Energy Production Corp.	20 North Broadway	Oklahoma City OK		\$	500,000.00			
8/8/12	Robert Amott	411 Avocado Ave.	Corona Del Mar CA	92625	\$	25,000.00			
8/8/12	Undelineated deposit. Potentially duplicative						\$	750,000.00	
8/14/12	Thomas Hauptman	PO Box 2235	Billings MT	59103	\$	10,000.00			
8/15/12	Barren Hilton	9864 Wilshire Blvd	Beverly Hills CA	90210	\$	40,800.00			
8/15/12	Blackburn Consulting	11521 Blocker Drive, Suite 110	Auburn CA	95603	\$	1,700.00			
8/15/12	Christopher James	Four Embarcadero Center, Suite 3500	San Francisco CA	94111	\$	100,000.00			
8/15/12	Crabtree Land Surveying	PO Box 2039	Healdsburg CA	95448	\$	50.00			
8/15/12	Frank Haughton	PO Box 2293	Billings MT	59103	\$	15,000.00			
8/15/12	Gene Haas	2800 Sturgis Road	Oxnard CA	93030	\$	800,000.00			

8/15/12	Gregory Wendt	1 Muir Loop	San Francisco CA	94129	\$	25,000.00	
8/15/12	Gochwend & Company APC	635 Hayne Road	Hillsborough CA	94010	\$	50.00	
8/15/12	Kleinfelder West, Inc.	5015 Shoreham Place	San Diego CA	92122	\$	22,700.00	
8/15/12	Lee Samson & Larry Felger	9200 Sunset Boulevard, Suite 7000	West Hollywood CA	90069	\$	50,000.00	
8/15/12	Life Technologies	5791 Van Allen Way	Carlsbad CA	92008	\$	25,000.00	
8/15/12	Mositi-Miller Engineering	224 Walnut Avenue, Suite B	Santa Cruz CA	95060	\$	500.00	
8/15/12	Rikard and Christine Ekstrand	247 19th Street	Santa Monica CA	90402	\$	20,000.00	
8/15/12	W. Gilbert Engineering	71 Herfax Circle	Chico CA	95926	\$	50.00	
8/16/12	Ray C Realty Corp	920 Route 1	Edison NJ	08817	\$	25,000.00	
8/16/12	Robert McNair	Reliant Stadium, 2 Reliant Park	Houston TX	77054	\$	1,000,000.00	
8/16/12	Undelineated deposit. Potentially duplicative						\$ 1,065,850.00
8/17/12	Wayne Hughes	22917 Pacific Coast Highway, Suite 300A	Malibu CA	90265	\$	450,000.00	
8/20/12	Andy Pudzer	6307 Carpinteria Avenue, Suite A	Carpinteria CA	93013	\$	48,651.54	
8/22/12	Coleman Engineering	1340 Blue Oaks Blvd, Suite 200	Roseville CA	95678	\$	200.00	
8/22/12	DMC Design Group Inc.	140 N. Maple Street, Suite 104	Corona CA	92880	\$	50.00	
8/22/12	Drake Haglan and Associates	11060 White Rock Road, Suite 200	Rancho Cord CA	95670	\$	950.00	
8/22/12	Robert Shillman	PO Box 676267	Rancho Santa CA	92067	\$	50,000.00	
8/22/12	The Hanna Group	1428 Alvarado Ave	Burlingame CA	94010	\$	600.00	
8/24/12	Smithfield Foods	200 Commerce Street	Smithfield VA	23430	\$	100,000.00	
8/28/12	Holdrege & Kuß	792 Searls Ave	Nevada City CA	95959	\$	500.00	
8/28/12	Mines Management Inc.	905 W. Riverside Ave	Spokane WA	99201	\$	10,000.00	
8/28/12	Robert Heinen Consulting Engineers	1075 Silverhill Drive	Lafayette CA	94549	\$	150.00	
8/28/12	Stevens Cresto Engineering	9665 Chesapeake Drive, Suite 320	San Diego CA	92123	\$	500.00	
8/28/12	Tylin International	Two Harrison Street	San Francisco CA	94105	\$	10,000.00	
8/28/12	Weatherby-Reynolds	206 Peek Street	Jackson CA	95642	\$	200.00	
8/28/12	Undelineated deposit. Potentially duplicative						\$ 100,000.00
8/29/12	Undelineated deposit. Potentially duplicative						\$ 11,350.00
8/30/12	B/E Aerospace, Inc.	1400 Corporate Center Way	Wellington FL	33414	\$	200,000.00	
8/30/12	Berge Hagopian				\$		
8/30/12	Ed Haddock	3300 University Boulevard	Winter Park FL	32792	\$	50,000.00	
8/30/12	J.W. Mann	1621 Crescent Heights Blvd	Los Angeles CA	90069	\$	500.00	
8/30/12	James Heavener	3300 University Boulevard	Winter Park FL	32792	\$	100,000.00	
8/30/12	John J. Fisher	110 Pacific Avenue, Suite 147	San Francisco CA	94111	\$	700,000.00	
8/30/12	Jon Phelps	3300 University Boulevard	Winter Park FL	32792	\$	50,000.00	
8/30/12	Kootenai Resource Corporation	707 Iowa Ave.	Whitefish MT	59937	\$	10,000.00	
8/30/12	Montana Contractors Association	PO Box 4519	Helena MT	59604	\$	50,000.00	
8/30/12	Parker J. Collier	9045 Strada Stell Court, Suite 500	Naples FL	34109	\$	5,000.00	
8/31/12	Cognex Corp.	One Vision Drive	Natick MA	01760	\$	250,000.00	
8/31/12	DCI Group, LLC	1828 L St.	Washington DC	20036	\$	10,000.00	
8/31/12	The Business Bank	133 Maple Avenue East	Vienna VA	22180	\$	2,593.68	Interest
9/5/12	Undelineated deposit. Potentially duplicative						\$ 1,214,151.54
9/6/12	Involve America					\$ 1,400,000.00	
9/7/12	Aveta	173 Bridge Plaza North	Fort Lee NJ	07024	\$	50,000.00	
9/7/12	Brian Harvey	PO Box 24001	Los Angeles CA	90024	\$	250,000.00	
9/7/12	Guida Surveying Inc.	9241 Irvine Boulevard Suite 100	Irvine CA	92618	\$	1,050.00	
9/7/12	Nancy and Richard Kinder	2929 Lazy Lane Blvd	Houston TX	77019	\$	200,000.00	
9/7/12	Peterson Brustad Inc.	1180 Iron Point Road	Folsom CA	95630	\$	500.00	
9/7/12	Poomas	555 S. Flower Street, Suite 4400	Los Angeles CA	90071	\$	5,000.00	
9/7/12	Quad Knopf	PO Box 3699	Visalia CA	93278	\$	4,450.00	
9/7/12	Sonoma RSA, Inc.	1515 4th Street	Napa CA	94559	\$	1,050.00	
9/7/12	Western National Contractors	8 Executive Circle	Irvine CA	92614	\$	100,000.00	
9/11/12	ACEC	1303 J Street, Suite 450	Sacramento CA	95814	\$	100,000.00	
9/11/12	Continental Resources	PO Box 268835	Oklahoma City OK	73126	\$	1,000,000.00	
9/11/12	David Horowitz	2741 La Paz Road, Suite B	Laguna Niguel CA	92677	\$	50,000.00	
9/11/12	Gordon Butte Wind, LLC	3424 US Highway 12	Helena MT	59601	\$	50,000.00	
9/11/12	Jeffrey Henley	1605 Alisa Lane	Santa Barbara CA	93110	\$	25,000.00	
9/11/12	Moffatt & Nichol	PO Box 22648	Long Beach CA	90801	\$	4,300.00	
9/11/12	See's Consulting & Testing	PO Box 28246	Fresno CA	93729	\$	250.00	
9/11/12	Thomas McKernan	1070 Fallen Leaf Road	Arcadia CA	91006	\$	50,000.00	
9/11/12	Undelineated deposit. Potentially duplicative						\$ 612,050.00
9/11/12	Undelineated deposit. Potentially duplicative						\$ 1,254,550.00
9/12/12	DCI Group, LLC	1828 L St.	Washington DC	20036	\$	5,000.00	
9/14/12	BWF Consulting Engineers	510 Myrtle Street	South San Fr CA	94080	\$	300.00	
9/14/12	Great Northern Properties	5260 Irwin Road	Huntington WV	25705	\$	50,000.00	
9/14/12	Hardin Engineering Group	PO Box 501	Clovis CA	93613	\$	300.00	
9/14/12	Kimley-Horn and Associates	7878 North 16th Street, Suite 300	Phoenix AZ	85020	\$	1,000.00	
9/14/12	Lee Samson & Larry Felger	9200 Sunset Boulevard, Suite 7000	West Hollywood CA	90069	\$	50,000.00	
9/14/12	SNH Consulting Engineers & Geologists	812 W. Wabash Ave	Eureka CA	95501	\$	750.00	
9/14/12	Terence & Katrina Garnett	PO Box 25049	San Mateo CA	94402	\$	25,000.00	
9/14/12	Undelineated deposit. Potentially duplicative						\$ 25,000.00
9/17/12	Charles Schwabb	PO Box 192861	San Francisco CA	94119	\$	1,050,000.00	
9/17/12	Charles Schwabb	PO Box 192861	San Francisco CA	94119	\$	4,400,000.00	
9/17/12	John Kissick	16130 Ventura Blvd, #320	Encino CA	91436	\$	25,000.00	
9/17/12	John Kleinheinz	301 Commerce Street, Suite 1900	Fort Worth TX	76102	\$	200,000.00	
9/17/12	Timothy Barnard	PO Box 99	Bozeman MT	59771	\$	25,000.00	
9/17/12	Undelineated deposit. Potentially duplicative						\$ 127,350.00
9/17/12	Undelineated deposit. Potentially duplicative						\$ 5,450,000.00
9/18/12	Anthony Ressler	16130 Ventura Blvd, #320	Encino CA	91436	\$	25,000.00	
9/21/12	Jesse and Mindy Rogers	PO Box 8038	Redwood City CA	94063	\$	450,000.00	
9/24/12	Alexander Dean & Catherine Cockrum Dean	1 Maritime Plaza, Suite 1400	San Francisco CA	94111	\$	50,000.00	
9/24/12	Cottonwood Financial	1901 Gateway Drive	Irving TX	75038	\$	50,000.00	
9/24/12	Dennis Washington	PO Box 16630	Missoula MT	59808	\$	100,000.00	
9/24/12	Hitchcock Automotive	PO Box 8610	City of Indus CA	91748	\$	100,000.00	
9/24/12	James Heavener	3300 University Boulevard	Winter Park FL	32792	\$	200,000.00	
9/24/12	The Mado- Rite Company	PO Box 3283	Longview TX	75606	\$	20,000.00	
9/24/12	William Duhamel	4 Verona Place	Corte Madera CA	94925	\$	50,000.00	
9/25/12	G.H. Palmer and Associates	11740 San Vicente Blvd, Suite 208	Los Angeles CA	90049	\$	250,000.00	

9/25/12	Gary Wilson	355 S. Grand Ave, Suite 1710	Los Angeles CA	90071	\$ 25,000.00	
9/25/12	Idea Marketplace, LLC	1800 Ave of the Stars, 3rd Floor	Los Angeles CA	90067	\$ 100,000.00	
9/26/12	Arch Coal	One City Place Drive	St. Louis MO	63141	\$ 10,000.00	
9/26/12	CA American Council of Engineering Companies	1303 J Street, Suite 450	Sacramento CA	95814	\$ 250,000.00	
9/26/12	Cash America	1600 West 7th Street	Forth Worth TX	76102	\$ 10,000.00	
9/26/12	Greg and Carrie Penner	PO Box 1860	Bentonville AR	72712	\$ 500,000.00	
9/26/12	HBI Financial	600 University Street, Suite 3600	Seattle WA	98101	\$ 250,000.00	
9/26/12	Retamco Operating	PO Box 790	Red Lodge MT	59068	\$ 10,000.00	
9/26/12	Select Management Resources	3440 Preston Rudge Road	Alpharetta GA	30005	\$ 10,000.00	
9/26/12	Wynn Resorts	PO Box 98866	Las Vegas NV	89193	\$ 500,000.00	
9/28/12	Crossroads Grassroots Policy Strategies	1401 New York Ave NW, Suite 1200	Washington DC	20005	\$ 2,000,000.00	
9/28/12	Fred Sands	11611 San Vicente Blvd, Suite 1000	Los Angeles CA	90049	\$ 10,000.00	
9/28/12	Prime Administration	50 California Street, Suite 3240	San Francisco CA	94111	\$ 75,000.00	
9/28/12	Stearns Lending	4 Hutton Centre Drive, 10th Floor	Santa Ana CA	92707	\$ 100,000.00	
9/28/12	The Business Bank	133 Maple Avenue East	Vienna VA	22180	\$ 3,950.24	Interest
10/1/12	230 Meek Road LLC	84 Villa Road	Greenville SC	29615	\$ 10,000.00	
10/1/12	Dennis Bryan	11400 W. Olympic Boulevard, Suite 1200	Los Angeles CA	90064	\$ 25,000.00	
10/1/12	G.H. Palmer and Associates	11740 San Vicente Blvd, Suite 208	Los Angeles CA	90049	\$ 250,000.00	
10/1/12	Joshua and Beth Friedman	1880 Century Park E Ste 1600	Los Angeles CA	90067	\$ 5,000.00	
10/1/12	Michael Tennenbaum	2951 28th Street, Suite 1000	Santa Monica CA	90405	\$ 5,000.00	
10/1/12	Murray Seldner	1949 Auto Centre Drive	Glendora CA	91740	\$ 500.00	
10/1/12	Tom McGilvray	993 S. 24th Street, W Suite D	Billings MT	59102	\$ 2,500.00	
10/2/12	Michigan Citizens for Fiscal Responsibility	12 E. Aileen St, Suite 700	Lansing MI	48933	\$ 425,000.00	
10/3/12	Colin Lind	909 Montgomery Street, Suite 400	San Francisco CA	94133	\$ 50,000.00	
10/3/12	Donald Beal	5 San Joaquin Plaza, Suite 320	Newport Bea CA	92660	\$ 10,000.00	
10/3/12	Doris Fisher	One Maritime Plaza, Suite 1400	San Francisco CA	94111	\$ 1,600,000.00	
10/3/12	John J. Fisher	One Maritime Plaza, Suite 1400	San Francisco CA	94111	\$ 3,000,000.00	
10/3/12	Parikh Consultants	2360 Queme Drive, Suite A	San Jose CA	95131	\$ 500.00	
10/3/12	Robert Fisher	One Maritime Plaza, Suite 1400	San Francisco CA	94111	\$ 800,000.00	
10/3/12	Ruth and Goling, Inc.	PO Box 26460	San Jose CA	95159	\$ 550.00	
10/3/12	William Fisher	One Maritime Plaza, Suite 1400	San Francisco CA	94111	\$ 1,600,000.00	
10/4/12	New Majority CA	2350 Kerner Blvd, Suite 250	San Rafael CA	94901	\$ 350,000.00	
10/5/12	Cynthia Stone	12849 Chalon Road	Los Angeles CA	90049	\$ 10,000.00	
10/5/12	Geoff Palmer	11740 San Vicente Blvd, Suite 208	Los Angeles CA	90049	\$ 500,000.00	
10/5/12	New Majority CA	2350 Kerner Blvd, Suite 250	San Rafael CA	94901	\$ 50,000.00	
10/5/12	New Majority CA	2350 Kerner Blvd, Suite 250	San Rafael CA	94901	\$ 100,000.00	
10/8/12	Dan or Staci Wilks	425 County Road 168	Cisco TX	76437	\$ 31,600.00	
10/8/12	Dan or Staci Wilks	425 County Road 168	Cisco TX	76437	\$ 31,600.00	
10/8/12	Gerald Parsky	10877 Wilshire Blvd, Suite 2100	Los Angeles CA	90024	\$ 50,000.00	
10/8/12	Shorenstein Realty Services	235 Montgomery Street, 16th Floor	San Francisco CA	94104	\$ 20,000.00	
10/8/12	Tully Friedman Rev. Trust	65 Raydiff Terrace	San Francisco CA	94115	\$ 100,000.00	
10/9/12	Bos Terra	PO Box 169	Hobson MT	59452	\$ 25,000.00	
10/9/12	Century Companies	PO Box 579	Lewistown MT	59457	\$ 5,000.00	
10/9/12	Eli Broad	10900 Wilshire Blvd, 12th Floor	Los Angeles CA	90024	\$ 500,000.00	
10/9/12	Mark Davis	814 Berkshire Ave	La Canada-Fl CA	91011	\$ 5,000.00	
10/9/12	Steven and Julie Durrett	3319 Jack Burke Lane	Billings MT	59106	\$ 5,000.00	
10/10/12	Farris & Jo Ann Woz	10235 IH 20 W	Eastland TX	76448	\$ 125,000.00	
10/10/12	Provost & Pritchard	286 West Cromwell Ave	Fresno CA	93711	\$ 5,500.00	
10/11/12	Barth Family Trust	2200 Chaucer Road	San Marino CA	91108	\$ 25,000.00	
10/11/12	Beal Bank	6000 Legacy Drive	Plano TX	75024	\$ 1,000,000.00	
10/11/12	Dr. and Mrs. Richard Robert	120 Arbutus Drive	Lakewood NJ	8701	\$ 25,000.00	
10/11/12	John Scully	591 Redwood Hwy, Suite 3215	Mill Valley CA	94941	\$ 500,000.00	
10/11/12	Sletten Construction	PO Box 2467	Great Falls MT	59403	\$ 25,000.00	
10/12/12	Charles Schwab	PO Box 192861	San Francisco CA	94119	\$ 2,000,000.00	
10/12/12	Elavon Merchant Services				\$ 25.00	
10/12/12	Matthew Barger	One Maritime Plaza, Suite 1350	San Francisco CA	94111	\$ 25,000.00	
10/12/12	Richard & Helen Devos	50 S. La Salle Street	Chicago IL	60604	\$ 1,000,000.00	
10/15/12	Doris Fisher	One Maritime Plaza, Suite 1400	San Francisco CA	94111	\$ 400,000.00	
10/15/12	John J. Fisher	One Maritime Plaza, Suite 1400	San Francisco CA	94111	\$ 1,000,000.00	
10/15/12	Robert Fisher	One Maritime Plaza, Suite 1400	San Francisco CA	94111	\$ 200,000.00	
10/15/12	Steven Mnuchin				\$ 5,000.00	
10/15/12	William Fisher	One Maritime Plaza, Suite 1400	San Francisco CA	94111	\$ 400,000.00	
10/16/12	Arch Coal	One City Place Drive	St. Louis MO	63141	\$ 5,000.00	
10/16/12	David Tunnell	3311 Pacific Avenue	San Francisco CA	94118	\$ 2,500.00	
10/16/12	Erik and Kendra Ragatz	165 Olive Hill Lane	Woodside CA	94062	\$ 10,000.00	
10/16/12	Marc Stern	23700 Malibu Colony Road	Malibu CA	90265	\$ 50,000.00	
10/16/12	Peter Blackstock	PO Box 369	Pebble Beach CA	93953	\$ 1,000.00	
10/16/12	Robert Henske	133 Ridgeway Road	Hillsborough CA	94010	\$ 10,000.00	
10/16/12	Stephen Chazen	PO Box 427	Pacific Palisades CA	90272	\$ 50,000.00	
10/16/12	Tom Olds	56 Golden Eagle	Irvine CA	92603	\$ 50,000.00	
10/17/12	Elavon Merchant Services				\$ 25.00	
10/18/12	Dr. Miriam Adelson	3355 Las Vegas Blvd	Las Vegas NV	89109	\$ 250,000.00	
10/18/12	Elavon Merchant Services				\$ 50,000.00	
10/18/12	Gary Lieberthal	991 Bel Air Road	Bel Air CA	90077	\$ 5,000.00	
10/18/12	LGM Management	201 E. Abram Street, Suite 120	Arlington TX	76010	\$ 33,333.33	
10/18/12	Sheldon Adelson	3355 Las Vegas Blvd	Las Vegas NV	89109	\$ 250,000.00	
10/18/12	Stewart Simonson	2039 New Hampshire Ave., NW	Washington DC	20009	\$ 2,500.00	
10/18/12	Undelineated deposit. Potentially duplicative				\$ 128,500.00	
10/19/12	Eli Broad	10900 Wilshire Blvd, 12th Floor	Los Angeles CA	90024	\$ 500,000.00	
10/19/12	Montana Hospital Association	PO Box 5119	Helena MT	59604	\$ 30,000.00	
10/19/12	Pharmaceutical Research & Manufacturers	950 F Street NW	Washington DC	20004	\$ 250,000.00	
10/19/12	U.S. Sugar Corp	111 Ponce de Leon Avenue	Clewiston FL	33440	\$ 250,000.00	
10/22/12	230 Meek Road LLC	84 Villa Road	Greenville SC	29615	\$ 66,667.00	
10/22/12	Brian Harvey	PO Box 24001	Los Angeles CA	90024	\$ 250,000.00	
10/22/12	Genstar Capital Management	4 Embarcadero Center	San Francisco CA	94111	\$ 99,000.00	
10/22/12	Horizon Fremont Investors		Salem NH	03079	\$ 500,000.00	
10/22/12	Select Management Resources	3440 Preston Rudge Road	Alpharetta GA	30005	\$ 90,000.00	

10/22/12	Washington Capital Advisors	PO Box 16630	Missoula MT	59808	\$ 20,000.00	
10/23/12	Ambassador Frank Baxter	1600 Huntington Drive	So. Pasadena CA	91030	\$ 50,000.00	
10/23/12	BNSF	2500 Lou Menk Drive	Fort Worth TX	76131	\$ 20,000.00	
10/23/12	Leon Black	9 W. 57th Street FL 43	New York NY	10019	\$ 150,000.00	
10/24/12	Vincent and Linda McNahan	14 Hurlingham Drive	Greenwich CT	6831	\$ 10,000.00	
10/25/12	Charles Schwabb	PO Box 192861	San Francisco CA	94119	\$ 1,000,000.00	
10/25/12	Quicken Loans	1050 Woodward Ave	Detroit MI	48226	\$ 250,000.00	
10/25/12	Rufus Lumry	PO Box 6847	Bellevue WA	98008	\$ 100,000.00	
10/25/12	Waxie Sanitary Supply	9353 Waste Way	San Diego CA	92123	\$ 10,000.00	
10/29/12	Checksmart Financial Company	7001 Post Road, Suite 200	Dublin OH	43016	\$ 50,000.00	
10/29/12	Elaven Merchant Services				\$ 100,000.00	
10/30/12	E&B Natural Resources MGMT Corp	1600 Norris Road	Bakersfield CA	93308	\$ 5,000.00	
10/30/12	EPS Engineering	PO Box 22370	San Diego CA	92192	\$ 50.00	
10/30/12	James Heavener	3300 University Boulevard	Winter Park FL	32792	\$ 250,000.00	
10/30/12	John and Karen Dolezal	1059 Carolyn Street	Ridgecrest CA	93555	\$ 50.00	
10/30/12	Jon Phelps	100 S. Eola Drive, PH 220	Orlando FL	32804	\$ 50,000.00	
10/30/12	Safra Catz	500 Oracle Parkway	Redwood Shire CA	94065	\$ 25,000.00	
10/30/12	Sime Construction	7720A Shedhorn Drive, PMB 140	Bozeman MT	59718	\$ 5,000.00	
10/31/12	Rosebush Corp	4080 Howell Road	Malvern PA	19355	\$ 1,500,000.00	
10/31/12	The Business Bank	133 Maple Avenue East	Vienna VA	22180	\$ 5,863.62	Interest
10/31/12	World Oil Corp.	PO Box 1966	South Gate CA	90280	\$ 30,000.00	
11/1/12	Eugene and Mary Lou Mallette	5796 Angle Ct.	Parker CO	80134	\$ 2,000.00	
11/1/12	Rosebush Corp	4080 Howell Road	Malvern PA	19355	\$ 500,000.00	
11/1/12	WIM Corporation	6910 Applegate Dr.	Helena MT	59602	\$ 5,000.00	
11/6/12	Cherlene Energy Shared Services, Inc.	700 Milan, Suite 800	Houston TX	77002	\$ 25,000.00	
11/29/12	DCI Group, LLC	1828 L St.	Washington DC	20036	\$ 10,000.00	
11/30/12	The Business Bank	133 Maple Avenue East	Vienna VA	22180	\$ 1,433.87	Interest
12/31/12	The Business Bank	133 Maple Avenue East	Vienna VA	22180	\$ 1,302.78	Interest
12/31/12	The Business Bank	133 Maple Avenue East	Vienna VA	22180	\$ 1,151.61	Interest

Date	Name	Address	City	State	Zip	Expense	Categorization
11/3/10	Hynes Communications	PO Box 4097	Portsmouth	NH	3802	\$ 13,000.00	Communications consulting
1/4/10	Paypal	2211 N. 1st Street	San Jose	CA	95131	\$ 30.00	Credit card processing fee
1/4/10	Aaron Kilian					\$ 300.00	Communications Consulting
1/5/10	Targetpoint Consulting	66 Canal Center Plaza	Alexandria	VA	22314	\$ 700.00	Survey research
1/6/10	ADP Payroll Fees	1 ADP Boulevard	Roseland	NJ	7068	\$ 57.27	Payroll Fees
1/8/10	American Express	200 Vesey Street	New York	NY	10281	\$ 2,800.12	Credit card expense
1/12/10	Cox Communications	6205-8 Peachtree Dunwoody Road	Atlanta	GA	30328	\$ 42.48	Internet Service
1/14/10	ADP Tax	1 ADP Boulevard	Roseland	NJ	7068	\$ 1,263.88	Payroll Fees
1/14/10	ADP Tax	1 ADP Boulevard	Roseland	NJ	7068	\$ 2,313.67	Payroll Fees
1/19/10	Feldman, Orlansky & Sanders	500 L. Street, #400	Anchorage	AK	99501	\$ 9,618.00	Legal fees
1/19/10	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria	VA	22314	\$ 413,701.90	Media placement
1/20/10	ADP Payroll Fees	1 ADP Boulevard	Roseland	NJ	7068	\$ 50.90	Payroll Fees
1/21/10	ADP Payroll Fees	1 ADP Boulevard	Roseland	NJ	7068	\$ 57.27	Payroll Fees
1/21/10	Feldman, Orlansky & Sanders	500 L. Street, #400	Anchorage	AK	99501	\$ 3,438.00	Legal fee
1/28/10	The November Company	66 Canal Center Plaza	Alexandria	VA	22314	\$ 13,250.00	Strategy Consulting
1/29/10	City of Alexandria	301 King Street	Alexandria	VA	22314	\$ 20.30	Fee
1/29/10	ADP Tax	1 ADP Boulevard	Roseland	NJ	7068	\$ 2,131.40	Payroll Fees
1/29/10	ADP Tax	1 ADP Boulevard	Roseland	NJ	7068	\$ 4,149.23	Payroll Fees
2/1/10	Verizon Wireless	PO Box 408	Newark	NJ	7101	\$ 133.59	Telephone service
2/2/10	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria	VA	22314	\$ 2,633.00	Media placement
2/2/10	Norway Hill Associates	30 Norway Hill	Hancock	NH	3449	\$ 12,500.00	Strategy Consulting
2/3/10	ADP Payroll Fees	1 ADP Boulevard	Roseland	NJ	7068	\$ 58.65	Payroll Fees
2/3/10	Verizon Wireless	PO Box 408	Newark	NJ	7101	\$ 326.44	Telephone service
2/12/10	ADP Tax	1 ADP Boulevard	Roseland	NJ	7068	\$ 1,218.60	Payroll Fees
2/12/10	ADP Tax	1 ADP Boulevard	Roseland	NJ	7068	\$ 2,313.67	Payroll Fees
2/12/10	WWP Strategies	PO Box 24215	Lansing	MI	48909	\$ 16,106.24	Communications consulting
2/17/10	Birch, Horton, Bittner & Cherot	1100 Connecticut Ave, NW Suite 825	Washington	DC	20036	\$ 177.00	Legal Fees
2/17/10	American Express	200 Vesey Street	New York	NY	10281	\$ 652.56	Credit card expense
2/18/10	ADP Payroll Fees	1 ADP Boulevard	Roseland	NJ	7068	\$ 57.27	Payroll Fees
2/25/10	Aaron Kilian					\$ 250.00	Communications Consulting
2/26/10	ADP Tax	1 ADP Boulevard	Roseland	NJ	7068	\$ 1,218.58	Payroll Fees
2/26/10	ADP Tax	1 ADP Boulevard	Roseland	NJ	7068	\$ 2,313.68	Payroll Fees
3/1/10	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria	VA	22314	\$ 2,675.80	Health Insurance
3/1/10	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria	VA	22314	\$ 146,634.40	Media placement
3/2/10	Verizon Wireless	PO Box 408	Newark	NJ	7101	\$ 143.59	Telephone service
3/2/10	The Wall Street Journal	1211 Avenue of the Americas	New York	NY	10036	\$ 207.48	Subscription
3/2/10	Norway Hill Associates	30 Norway Hill	Hancock	NH	3449	\$ 12,500.00	Strategy Consulting
3/3/10	ADP Payroll Fees	1 ADP Boulevard	Roseland	NJ	7068	\$ 57.27	Payroll Fees
3/3/10	First Wave Concepts	4258 Mayfair Lane	Port Orange	FL	32129	\$ 450.00	Digital consulting
3/4/10	Fortune	225 Liberty Street	New York	NY	10281	\$ 10.00	Subscription
3/4/10	Forbes	499 Washington Blvd	Jersey City	NJ	7310	\$ 14.99	Subscription
3/8/10	The November Company	66 Canal Center Plaza	Alexandria	VA	22314	\$ 13,250.00	Strategy Consulting
3/10/10	American Express	200 Vesey Street	New York	NY	10281	\$ 980.84	Credit card expense
3/10/10	WWP Strategies	PO Box 24215	Lansing	MI	48909	\$ 12,000.00	Communications consulting
3/10/10	WWP Strategies	PO Box 24215	Lansing	MI	48909	\$ 33,120.00	Communications consulting
3/11/10	American Courier	815 N. Royal St, #210	Alexandria	VA	22314	\$ 20.00	Courier Service
3/12/10	ADP Tax	1 ADP Boulevard	Roseland	NJ	7068	\$ 1,218.60	Payroll Fees
3/15/10	ADP Tax	1 ADP Boulevard	Roseland	NJ	7068	\$ 2,313.67	Payroll Fees
3/19/10	Spectrum Marketing Company	95 Eddy Rd	Manchester	NH	3102	\$ 11,000.00	Printing, Design & Postage
3/22/10	Mark Meadows					\$ 250.00	Communications consulting
3/23/10	Verizon Wireless	PO Box 408	Newark	NJ	7101	\$ 239.37	Telephone service
3/24/10	ADP Payroll Fees	1 ADP Boulevard	Roseland	NJ	7068	\$ 57.27	Payroll Fees
3/26/10	CrossTarget	66 Canal Center Plaza	Alexandria	VA	22314	\$ 1,300.00	Survey research
3/26/10	The November Company	66 Canal Center Plaza	Alexandria	VA	22314	\$ 13,250.00	Strategy Consulting
3/30/10	DC Treasurer	1101 4th Street SW, Suite 850W	Washington	DC	20024	\$ 75.00	Fee
3/30/10	Birch, Horton, Bittner & Cherot	1100 Connecticut Ave, NW Suite 825	Washington	DC	20036	\$ 350.00	Legal Fees
3/30/10	Patton Boggs, LLP	2550 M St NW	Washington	DC	20037	\$ 493.75	Legal fees
3/30/10	Norway Hill Associates	30 Norway Hill	Hancock	NH	3449	\$ 12,500.00	Strategy Consulting
4/5/10	ADP Tax	1 ADP Boulevard	Roseland	NJ	7068	\$ 1,218.58	Payroll Fees
4/5/10	ADP Tax	1 ADP Boulevard	Roseland	NJ	7068	\$ 2,313.68	Payroll Fees
4/5/10	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria	VA	22314	\$ 2,644.00	Media placement
4/9/10	Aaron Kilian					\$ 250.00	Communications Consulting
4/13/10	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria	VA	22314	\$ 356,279.40	Media placement
4/14/10	ADP Payroll Fees	1 ADP Boulevard	Roseland	NJ	7068	\$ 67.77	Payroll Fees
4/14/10	ADP Tax	1 ADP Boulevard	Roseland	NJ	7068	\$ 1,218.60	Payroll Fees
4/14/10	ADP Tax	1 ADP Boulevard	Roseland	NJ	7068	\$ 2,313.67	Payroll Fees
4/16/10	American Express	200 Vesey Street	New York	NY	10281	\$ 990.31	Credit card expense
4/19/10	Patton Boggs, LLP	2550 M St NW	Washington	DC	20037	\$ 5,374.25	Legal fees
4/19/10	Birch, Horton, Bittner & Cherot	1100 Connecticut Ave, NW Suite 825	Washington	DC	20036	\$ 16,204.17	Legal Fees
4/19/10	Spectrum Marketing Company	95 Eddy Rd	Manchester	NH	3102	\$ 39,000.00	Printing, Design & Postage
4/21/10	ADP Payroll Fees	1 ADP Boulevard	Roseland	NJ	7068	\$ 57.27	Payroll Fees
4/21/10	Associated Public Affairs					\$ 6,000.00	Communications Consulting
4/22/10	Hackney & Hackney	1503 W. 31st Street	Anchorage	AK	99517	\$ 1,785.90	Media production
4/23/10	First Wave Concepts	4258 Mayfair Lane	Port Orange	FL	32129	\$ 450.00	Digital consulting
4/29/10	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria	VA	22314	\$ 2,644.00	Media placement
4/29/10	ADP Tax	1 ADP Boulevard	Roseland	NJ	7068	\$ 5,257.98	Payroll Fees
4/29/10	ADP Tax	1 ADP Boulevard	Roseland	NJ	7068	\$ 7,855.14	Payroll Fees
4/30/10	The November Company	66 Canal Center Plaza	Alexandria	VA	22314	\$ 13,250.00	Strategy Consulting
5/4/10	Verizon Wireless	PO Box 408	Newark	NJ	7101	\$ 53.27	Telephone service
5/4/10	Spectrum Marketing Company	95 Eddy Rd	Manchester	NH	3102	\$ 5,297.24	Printing, Design & Postage
5/4/10	Liberty Services Corporation					\$ 65,000.00	Strategy Consulting
5/5/10	ADP Payroll Fees	1 ADP Boulevard	Roseland	NJ	7068	\$ 56.65	Payroll Fees
5/5/10	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria	VA	22314	\$ 735,570.00	Media placement
5/6/10	The Business Bank	133 Maple Avenue East	Vienna	VA	22180	\$ 25.00	Fee
5/6/10	The Business Bank	133 Maple Avenue East	Vienna	VA	22180	\$ 25.00	Fee
5/6/10	Ascension Strategies Group					\$ 1,000.00	Communications Consulting
5/6/10	Northwestern Mutual	720 East Wisconsin Ave.	Milwaukee	WI	53202	\$ 3,908.04	Insurance
5/6/10	WWP Strategies	PO Box 24215	Lansing	MI	48909	\$ 19,021.66	Communications consulting
5/7/10	The Business Bank	133 Maple Avenue East	Vienna	VA	22180	\$ 25.00	Fee
5/7/10	Norway Hill Associates	30 Norway Hill	Hancock	NH	3449	\$ 12,500.00	Strategy Consulting
5/7/10	The Strategy Group for Media	1 South High Street	Columbus	OH	43215	\$ 47,536.80	Media placement
5/10/10	American Express	200 Vesey Street	New York	NY	10281	\$ 1,178.20	Credit card expense

5/11/10	The Sterling Corporation	106 W. Allegan, Suite 200	Lansing MI	48933	\$ 17,670.00	Strategy Consulting
5/11/10	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria VA	22314	\$ 416,821.50	Media placement
5/12/10	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria VA	22314	\$ 123,188.00	Media placement
5/14/10	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$ 1,218.58	Payroll Fees
5/14/10	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$ 2,313.68	Payroll Fees
5/18/10	David Welch				\$ 400.00	Issue research consulting
5/19/10	ADP Payroll Fees	1 ADP Boulevard	Roseland NJ	7068	\$ 57.27	Payroll Fees
5/21/10	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria VA	22314	\$ 54,089.00	Media placement
5/24/10	The Business Bank	133 Maple Avenue East	Vienna VA	22180	\$ 25.00	Fee
5/24/10	Bright Media				\$ 15,750.00	Media production
5/25/10	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria VA	22314	\$ 123,197.00	Media placement
5/27/10	WWP Strategies	PO Box 24215	Lansing MI	48909	\$ 43,302.00	Communications consulting
5/28/10	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$ 1,218.60	Payroll Fees
5/28/10	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$ 2,313.67	Payroll Fees
6/1/10	Verizon Wireless	PO Box 408	Newark NJ	7101	\$ 145.30	Telephone service
6/1/10	Norway Hill Associates	30 Norway Hill	Hancock NH	3449	\$ 12,500.00	Strategy Consulting
6/2/10	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria VA	22314	\$ 2,644.00	Media placement
6/2/10	Spectrum Marketing Company	95 Eddy Rd	Manchester NH	3102	\$ 38,623.21	Printing, Design & Postage
6/3/10	ADP Payroll Fees	1 ADP Boulevard	Roseland NJ	7068	\$ 57.27	Payroll Fees
6/3/10	Trencon, Segarra & Hore	8321 Main Street	Williamsville NY	14221	\$ 300.00	Accounting
6/4/10	Patton Boggs, LLP	2550 M St NW	Washington DC	20037	\$ 5,228.99	Legal fees
6/6/10	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria VA	22314	\$ 9,025.00	Media placement
6/8/10	David Welch				\$ 200.00	Issue research consulting
6/11/10	WWP Strategies	PO Box 24215	Lansing MI	48909	\$ 5,829.56	Communications consulting
6/13/10	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$ 2,313.68	Payroll Fees
6/14/10	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$ 1,218.58	Payroll Fees
6/17/10	WWP Strategies	PO Box 24215	Lansing MI	48909	\$ 97,791.00	Communications consulting
6/23/10	ADP Payroll Fees	1 ADP Boulevard	Roseland NJ	7068	\$ 57.27	Payroll Fees
6/23/10	The Business Bank	133 Maple Avenue East	Vienna VA	22180	\$ 150.00	Fee
6/23/10	Liberty Services Corporation				\$ 195,000.00	Strategy Consulting
6/25/10	The Strategy Group for Media	1 South High Street	Columbus OH	43215	\$ 8,000.00	Media placement
6/28/10	American Courier	815 N. Royal St, #210	Alexandria VA	22314	\$ 20.00	Courier Service
6/28/10	American Express	200 Vesey Street	New York NY	10281	\$ 143.86	Credit card expense
6/28/10	Patton Boggs, LLP	2550 M St NW	Washington DC	20037	\$ 12,426.02	Legal fees
6/28/10	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria VA	22314	\$ 26,805.00	Media placement
6/28/10	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria VA	22314	\$ 249,020.00	Media placement
6/29/10	Allison Welch				\$ 300.00	Research Consulting
6/29/10	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$ 1,218.60	Payroll Fees
6/29/10	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$ 2,313.67	Payroll Fees
6/29/10	Norway Hill Associates	30 Norway Hill	Hancock NH	3449	\$ 12,500.00	Strategy Consulting
6/30/10	Jason Killian Meath	1625 Eye Street NW	Washington DC	20006	\$ 7,450.00	Media production
6/30/10	The November Company	66 Canal Center Plaza	Alexandria VA	22314	\$ 13,250.00	Strategy Consulting
7/2/10	Inc.	7 World Trade Center	New York NY	10007	\$ 5.00	Subscription
7/6/10	Forbes	499 Washington Blvd	Jersey City NJ	7310	\$ 12.00	Subscription
7/6/10	The November Company	66 Canal Center Plaza	Alexandria VA	22314	\$ 13,250.00	Strategy Consulting
7/7/10	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria VA	22314	\$ 2,644.00	Media placement
7/7/10	The Sterling Corporation	106 W. Allegan, Suite 200	Lansing MI	48933	\$ 3,960.00	Strategy Consulting
7/7/10	Spectrum Marketing Company	95 Eddy Rd	Manchester NH	3102	\$ 34,442.00	Printing, Design & Postage
7/7/10	Spectrum Marketing Company	95 Eddy Rd	Manchester NH	3102	\$ 63,423.56	Printing, Design & Postage
7/7/10	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria VA	22314	\$ 103,822.30	Media placement
7/8/10	Stephen DelMaura	66 Canal Center Plaza	Alexandria VA	22314	\$ 39.22	Reimbursement
7/8/10	ADP Payroll Fees	1 ADP Boulevard	Roseland NJ	7068	\$ 60.27	Payroll Fees
7/9/10	Patton Boggs, LLP	2550 M St NW	Washington DC	20037	\$ 15,278.14	Legal fees
7/9/10	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria VA	22314	\$ 93,700.00	Media placement
7/12/10	Spectrum Marketing Company	95 Eddy Rd	Manchester NH	3102	\$ 180.50	Printing, Design & Postage
7/14/10	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$ 1,218.58	Payroll Fees
7/14/10	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$ 2,313.68	Payroll Fees
7/14/10	The Sterling Corporation	106 W. Allegan, Suite 200	Lansing MI	48933	\$ 14,400.00	Strategy Consulting
7/14/10	The Strategy Group for Media	1 South High Street	Columbus OH	43215	\$ 74,522.10	Media placement
7/15/10	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria VA	22314	\$ 252,156.00	Media placement
7/19/10	Trencon, Segarra & Hore	8321 Main Street	Williamsville NY	14221	\$ 3,000.00	Accounting
7/19/10	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria VA	22314	\$ 316,245.50	Media placement
7/20/10	The Strategy Group for Media	1 South High Street	Columbus OH	43215	\$ 17,595.60	Media placement
7/20/10	The Sterling Corporation	106 W. Allegan, Suite 200	Lansing MI	48933	\$ 39,000.00	Strategy Consulting
7/20/10	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria VA	22314	\$ 142,876.50	Media placement
7/21/10	ADP Payroll Fees	1 ADP Boulevard	Roseland NJ	7068	\$ 70.77	Payroll Fees
7/21/10	Aaron Killian				\$ 250.00	Communications Consulting
7/21/10	Spectrum Marketing Company	95 Eddy Rd	Manchester NH	3102	\$ 64,000.00	Printing, Design & Postage
7/27/10	Arena Communications	1780 Sequoia Vista Circle	Salt Lake City UT	84104	\$ 20,754.00	Printing, Design & Postage
7/27/10	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria VA	22314	\$ 39,730.00	Media placement
7/27/10	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria VA	22314	\$ 500,355.30	Media placement
7/29/10	The Business Bank	133 Maple Avenue East	Vienna VA	22180	\$ 25.00	Fee
7/29/10	The Business Bank	133 Maple Avenue East	Vienna VA	22180	\$ 25.00	Fee
7/29/10	Northwestern Mutual	720 East Wisconsin Ave.	Milwaukee WI	53202	\$ 3,896.26	Insurance
7/29/10	The Sterling Corporation	106 W. Allegan, Suite 200	Lansing MI	48933	\$ 7,700.00	Strategy Consulting
7/29/10	The Strategy Group for Media	1 South High Street	Columbus OH	43215	\$ 67,580.00	Media placement
7/30/10	Norway Hill Associates	30 Norway Hill	Hancock NH	3449	\$ 12,500.00	Strategy Consulting
7/30/10	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$ 16,649.11	Payroll Fees
7/30/10	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$ 18,613.00	Payroll Fees
7/30/10	Spectrum Marketing Company	95 Eddy Rd	Manchester NH	3102	\$ 60,683.90	Printing, Design & Postage
8/2/10	The Trailblazer Group	901 King Street	Alexandria VA	22314	\$ 980.00	Fundraising Services
8/2/10	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria VA	22314	\$ 2,644.00	Media placement
8/2/10	Patton Boggs, LLP	2550 M St NW	Washington DC	20037	\$ 3,693.64	Legal fees
8/2/10	The November Company	66 Canal Center Plaza	Alexandria VA	22314	\$ 13,250.00	Strategy Consulting
8/3/10	DC Treasurer	1101 4th Street SW, Suite 850W	Washington DC	20024	\$ 25.00	Fee
8/3/10	Verizon Wireless	PO Box 408	Newark NJ	7101	\$ 153.64	Telephone service
8/4/10	The Business Bank	133 Maple Avenue East	Vienna VA	22180	\$ 25.00	Fee
8/4/10	ADP Payroll Fees	1 ADP Boulevard	Roseland NJ	7068	\$ 61.64	Payroll Fees
8/4/10	The Strategy Group for Media	1 South High Street	Columbus OH	43215	\$ 16,000.00	Media placement
8/5/10	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria VA	22314	\$ 282,831.00	Media placement
8/6/10	Crazy Eyes Production	331 W. 3rd St.	Davenport IA	52801	\$ 1,000.00	Media Production
8/9/10	American Express	200 Vesey Street	New York NY	10281	\$ 685.74	Credit card expense
8/13/10	Aaron Killian				\$ 500.00	Communications Consulting

8/13/10	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$ 1,218.58	Payroll Fees
8/13/10	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$ 2,313.68	Payroll Fees
8/18/10	ADP Payroll Fees	1 ADP Boulevard	Roseland NJ	7068	\$ 60.27	Payroll Fees
8/18/10	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria VA	22314	\$ 130,030.00	Media placement
8/25/10	The Lukens Company	2800 Shrlington Rd	Arlington VA	22206	\$ 30,136.34	Design, printing and postage
8/25/10	Smart Media Group	1427 Leslie Ave	Alexandria VA	22301	\$ 54,424.20	Media placement
8/26/10	Verizon Wireless	PO Box 408	Newark NJ	7101	\$ 145.77	Telephone service
8/27/10	Norway Hill Associates	30 Norway Hill	Hancock NH	3449	\$ 12,500.00	Strategy Consulting
8/27/10	Mentzer Media Services	600 Fairmount Ave	Towson MD	21204	\$ 1,196,429.00	Media placement
8/30/10	John Hancock & Associates	326 E. Mark St.	Sandusky OH	44870	\$ 1,470.00	Research Consulting
8/31/10	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$ 1,218.60	Payroll Fees
8/31/10	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$ 2,313.67	Payroll Fees
9/1/10	The November Company	66 Canal Center Plaza	Alexandria VA	22314	\$ 13,250.00	Strategy Consulting
9/2/10	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria VA	22314	\$ 2,644.00	Media placement
9/2/10	Mentzer Media Services	600 Fairmount Ave	Towson MD	21204	\$ 1,789,262.00	Media placement
9/3/10	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria VA	22314	\$ 36,075.00	Media placement
9/3/10	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria VA	22314	\$ 65,015.00	Media placement
9/6/10	Patton Boggs, LLP	2550 M St NW	Washington DC	20037	\$ 27,618.91	Legal fees
9/7/10	American Express	200 Vesey Street	New York NY	10281	\$ 2,179.17	Credit card expense
9/7/10	Allison Welch				\$ 8,000.00	Research Consulting
9/9/10	ADP Payroll Fees	1 ADP Boulevard	Roseland NJ	7068	\$ 60.27	Payroll Fees
9/9/10	The Lukens Company	2800 Shrlington Rd	Arlington VA	22206	\$ 27,700.25	Design, printing and postage
9/10/10	City of Alexandria	301 King Street	Alexandria VA	22314	\$ 80.00	Fee
9/10/10	Intuit	2700 Coast Ave	Mountain View CA	94043	\$ 95.53	Subscription
9/10/10	Mentzer Media Services	600 Fairmount Ave	Towson MD	21204	\$ 1,000,870.00	Media placement
9/13/10	Media Police Department	301 N. Jackson St.	Media PA	19063	\$ 10.00	Fees
9/14/10	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$ 1,218.58	Payroll Fees
9/14/10	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$ 2,313.68	Payroll Fees
9/14/10	Ascension Strategies Group				\$ 9,200.00	Communications Consulting
9/17/10	Hackney & Hackney	1503 W. 31st Street	Anchorage AK	99517	\$ 1,985.90	Media production
9/20/10	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria VA	22314	\$ 529.42	Media placement
9/20/10	Direct Response, LLC	2340 E. Beardsley Rd, #100	Phoenix AZ	85024	\$ 100,000.00	Printing, Design & Postage
9/22/10	ADP Payroll Fees	1 ADP Boulevard	Roseland NJ	7068	\$ 60.27	Payroll Fees
9/22/10	Direct Response, LLC	2340 E. Beardsley Rd, #100	Phoenix AZ	85024	\$ 150,000.00	Printing, Design & Postage
9/23/10	Fast Company	7 World Trade Center	New York NY	10007	\$ 10.00	Subscription
9/23/10	Forbes	499 Washington Blvd	Jersey City NJ	7310	\$ 61.95	Subscription
9/24/10	Upgrade Films				\$ 14,572.00	Media production
9/27/10	Stephen DeMauro	66 Canal Center Plaza	Alexandria VA	22314	\$ 23.00	Reimbursement
9/29/10	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$ 1,218.60	Payroll Fees
9/29/10	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$ 2,313.67	Payroll Fees
9/29/10	Mentzer Media Services	600 Fairmount Ave	Towson MD	21204	\$ 487,500.00	Media placement
9/30/10	Verizon Wireless	PO Box 408	Newark NJ	7101	\$ 143.61	Telephone service
9/30/10	City of Alexandria	301 King Street	Alexandria VA	22314	\$ 203.37	Fee
9/30/10	Corporate Services Company	251 Little Falls Drive	Wilmington DE	19808	\$ 612.00	Fee
9/30/10	Patton Boggs, LLP	2550 M St NW	Washington DC	20037	\$ 6,987.01	Legal fees
9/30/10	Norway Hill Associates	30 Norway Hill	Hancock NH	3449	\$ 12,500.00	Strategy Consulting
10/6/10	ADP Payroll Fees	1 ADP Boulevard	Roseland NJ	7068	\$ 60.27	Payroll Fees
10/8/10	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria VA	22314	\$ 2,644.00	Media placement
10/8/10	The November Company	66 Canal Center Plaza	Alexandria VA	22314	\$ 13,250.00	Strategy Consulting
10/12/10	Treasurer of Virginia	101 N. 14th St.	Richmond VA	23219	\$ 25.00	Fee
10/12/10	Allison Welch				\$ 2,400.00	Research Consulting
10/13/10	Upgrade Films				\$ 2,000.00	Media production
10/14/10	City of Alexandria	301 King Street	Alexandria VA	22314	\$ 65.00	Fee
10/14/10	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$ 1,218.58	Payroll Fees
10/14/10	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$ 2,313.68	Payroll Fees
10/14/10	Direct Response, LLC	2340 E. Beardsley Rd, #100	Phoenix AZ	85024	\$ 3,783.61	Printing, Design & Postage
10/14/10	Stephen DeMauro	66 Canal Center Plaza	Alexandria VA	22314	\$ 4,793.82	Reimbursement
10/15/10	American Express	200 Vesey Street	New York NY	10281	\$ 15,166.48	Credit card expense
10/19/10	Max Kinnman				\$ 200.00	Consulting
10/20/10	ADP Payroll Fees	1 ADP Boulevard	Roseland NJ	7068	\$ 70.77	Payroll Fees
10/20/10	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria VA	22314	\$ 884,405.40	Media placement
10/21/10	PMA Properties, 815, LLC	1600 Prince St, #109	Alexandria VA	22314	\$ 1,275.00	Rent
10/22/10	WWP Strategies	PO Box 24215	Lansing MI	48909	\$ 67,360.00	Communications consulting
10/29/10	Northwestern Mutual	720 East Wisconsin Ave.	Milwaukee WI	53202	\$ 3,896.26	Insurance
10/29/10	Mentzer Media Services	600 Fairmount Ave	Towson MD	21204	\$ 11,600.00	Media placement
10/29/10	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$ 14,584.81	Payroll Fees
10/29/10	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$ 22,478.83	Payroll Fees
10/29/10	Direct Response, LLC	2340 E. Beardsley Rd, #100	Phoenix AZ	85024	\$ 260,000.00	Printing, Design & Postage
11/1/10	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria VA	22314	\$ 8,177.50	Media placement
11/1/10	The November Company	66 Canal Center Plaza	Alexandria VA	22314	\$ 13,250.00	Strategy Consulting
11/2/10	American Courier	815 N. Royal St, #210	Alexandria VA	22314	\$ 20.00	Courier Service
11/2/10	Verizon Wireless	PO Box 408	Newark NJ	7101	\$ 145.65	Telephone service
11/2/10	Patton Boggs, LLP	2550 M St NW	Washington DC	20037	\$ 33,559.85	Legal fees
11/3/10	ADP Payroll Fees	1 ADP Boulevard	Roseland NJ	7068	\$ 61.64	Payroll Fees
11/3/10	Norway Hill Associates	30 Norway Hill	Hancock NH	3449	\$ 1,302.70	Strategy Consulting
11/3/10	First Wave Concepts	4258 Mayfair Lane	Port Orange FL	32129	\$ 7,850.00	Digital consulting
11/4/10	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria VA	22314	\$ 2,644.00	Media placement
11/8/10	American Express	200 Vesey Street	New York NY	10281	\$ 6,009.35	Credit card expense
11/9/10	Fast Company	7 World Trade Center	New York NY	10007	\$ 10.00	Subscription
11/10/10	Stephen DeMauro	66 Canal Center Plaza	Alexandria VA	22314	\$ 145.59	Reimbursement
11/12/10	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$ 811.72	Payroll Fees
11/12/10	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$ 2,517.11	Payroll Fees
11/12/10	Norway Hill Associates	30 Norway Hill	Hancock NH	3449	\$ 12,500.00	Strategy Consulting
11/17/10	ADP Payroll Fees	1 ADP Boulevard	Roseland NJ	7068	\$ 60.27	Payroll Fees
11/19/10	Matt Worthen				\$ 200.00	Consulting
11/29/10	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$ 811.72	Payroll Fees
11/29/10	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$ 2,517.11	Payroll Fees
12/1/10	ADP Payroll Fees	1 ADP Boulevard	Roseland NJ	7068	\$ 60.27	Payroll Fees
12/6/10	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria VA	22314	\$ 2,644.00	Media placement
12/7/10	The November Company	66 Canal Center Plaza	Alexandria VA	22314	\$ 13,250.00	Strategy Consulting
12/9/10	PMA Properties, 815, LLC	1600 Prince St, #109	Alexandria VA	22314	\$ 775.00	Rent
12/9/10	Chubb Group of Insurance Companies	PO Box 7247	Philadelphia PA	19170	\$ 1,875.00	Insurance
12/9/10	Chubb Group of Insurance Companies	PO Box 7247	Philadelphia PA	19170	\$ 1,875.00	Insurance

12/9/10	Patton Boggs, LLP	2550 M St NW	Washington DC	20037	\$	10,178.28	Legal fees
12/9/10	American Express	200 Vesey Street	New York NY	10281	\$	17,417.83	Credit card expense
12/10/10	Verizon Wireless	PO Box 408	Newark NJ	7101	\$	160.03	Telephone service
12/10/10	Tronconi, Segarra & Hore	8321 Main Street	Williamsville NY	14221	\$	2,100.00	Accounting
12/14/10	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$	811.70	Payroll Fees
12/14/10	Birch, Horton, Bittner & Cherot	1100 Connecticut Ave, NW Suite 825	Washington DC	20036	\$	852.92	Legal Fees
12/14/10	The Hartford	PO Box 2907	Hartford CT	6104	\$	1,646.00	Insurance
12/14/10	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$	2,517.12	Payroll Fees
12/14/10	Norway Hill Associates	30 Norway Hill	Hancock NH	3449	\$	12,500.00	Strategy Consulting
12/15/10	First Wave Concepts	4258 Mayfair Lane	Port Orange FL	32129	\$	75.00	Digital consulting
12/15/10	Internal Revenue Service	PO Box 409101	Ogden UT	84409	\$	1,300.00	Fees
12/22/10	ADP Payroll Fees	1 ADP Boulevard	Roseland NJ	7068	\$	60.27	Payroll Fees
12/23/10	DC Treasurer	1101 4th Street SW, Suite 850W	Washington DC	20024	\$	50.00	Fee
12/27/10	Verizon Wireless	PO Box 408	Newark NJ	7101	\$	154.52	Telephone service
12/29/10	Norway Hill Associates	30 Norway Hill	Hancock NH	3449	\$	12,500.00	Strategy Consulting
12/30/10	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$	811.72	Payroll Fees
12/30/10	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$	2,517.11	Payroll Fees
1/5/11	ADP Payroll Fees	1 ADP Boulevard	Roseland NJ	7068	\$	60.27	Payroll Fees
1/11/11	PMA Properties, 815, LLC	1600 Prince St, #109	Alexandria VA	22314	\$	775.00	Rent
1/12/11	First Wave Concepts	4258 Mayfair Lane	Port Orange FL	32129	\$	325.00	Digital consulting
1/13/11	Patton Boggs, LLP	2550 M St NW	Washington DC	20037	\$	427.19	Legal fees
1/14/11	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$	1,214.13	Payroll Fees
1/14/11	Birch, Horton, Bittner & Cherot	1100 Connecticut Ave, NW Suite 825	Washington DC	20036	\$	1,264.76	Legal Fees
1/14/11	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$	2,369.66	Payroll Fees
1/19/11	ADP Payroll Fees	1 ADP Boulevard	Roseland NJ	7068	\$	50.90	Payroll Fees
1/20/11	ADP Payroll Fees	1 ADP Boulevard	Roseland NJ	7068	\$	60.27	Payroll Fees
1/21/11	The Black Rock Group	66 Canal Center Plaza	Alexandria VA	22314	\$	13,250.00	Communications consulting
1/24/11	American Courier	815 N. Royal St, #210	Alexandria VA	22314	\$	20.00	Courier Service
1/25/11	Verizon Wireless	PO Box 408	Newark NJ	7101	\$	150.01	Telephone service
1/26/11	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$	2,369.66	Payroll Fees
1/28/11	City of Alexandria	301 King Street	Alexandria VA	22314	\$	40.00	Fee
1/28/11	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$	1,214.12	Payroll Fees
1/31/11	Northwestern Mutual	720 East Wisconsin Ave.	Milwaukee WI	53202	\$	3,896.26	Insurance
2/1/11	Norway Hill Associates	30 Norway Hill	Hancock NH	3449	\$	12,500.00	Strategy Consulting
2/2/11	ADP Payroll Fees	1 ADP Boulevard	Roseland NJ	7068	\$	60.27	Payroll Fees
2/7/11	PMA Properties, 815, LLC	1600 Prince St, #109	Alexandria VA	22314	\$	1,013.00	Rent
2/7/11	The Black Rock Group	66 Canal Center Plaza	Alexandria VA	22314	\$	13,250.00	Communications consulting
2/15/11	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$	1,177.18	Payroll Fees
2/15/11	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$	2,369.66	Payroll Fees
2/24/11	ADP Payroll Fees	1 ADP Boulevard	Roseland NJ	7068	\$	60.27	Payroll Fees
2/28/11	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$	1,162.50	Payroll Fees
2/28/11	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$	2,369.66	Payroll Fees
3/7/11	The Black Rock Group	66 Canal Center Plaza	Alexandria VA	22314	\$	13,250.00	Communications consulting
3/8/11	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria VA	22314	\$	743.07	Media placement
3/8/11	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria VA	22314	\$	743.07	Media placement
3/8/11	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria VA	22314	\$	2,743.07	Health Insurance
3/9/11	ADP Payroll Fees	1 ADP Boulevard	Roseland NJ	7068	\$	60.27	Payroll Fees
3/9/11	North Bridge Communications	4401-A Connecticut Ave, NW	Washington DC	20008	\$	1,000.00	Media production
3/10/11	DC Treasurer	1101 4th Street SW, Suite 850W	Washington DC	20024	\$	50.00	Fee
3/10/11	Verizon Wireless	PO Box 408	Newark NJ	7101	\$	150.01	Telephone service
3/10/11	Patton Boggs, LLP	2550 M St NW	Washington DC	20037	\$	1,268.04	Legal fees
3/11/11	First Wave Concepts	4258 Mayfair Lane	Port Orange FL	32129	\$	175.00	Digital consulting
3/14/11	PMA Properties, 815, LLC	1600 Prince St, #109	Alexandria VA	22314	\$	894.00	Rent
3/15/11	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$	1,162.61	Payroll Fees
3/15/11	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$	2,369.66	Payroll Fees
3/15/11	Norway Hill Associates	30 Norway Hill	Hancock NH	3449	\$	12,500.00	Strategy Consulting
3/22/11	Taxpayers Protection Alliance	108 N. Alfred Street	Alexandria VA	22314	\$	5,000.00	Contribution
3/23/11	ADP Payroll Fees	1 ADP Boulevard	Roseland NJ	7068	\$	60.27	Payroll Fees
3/24/11	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria VA	22314	\$	429,390.60	Media placement
3/28/11	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria VA	22314	\$	301,524.40	Media placement
3/29/11	Spectrum Marketing Company	95 Eddy Rd	Manchester NH	3102	\$	119.00	Printing, Design & Postage
3/29/11	Verizon Wireless	PO Box 408	Newark NJ	7101	\$	305.04	Telephone service
3/29/11	Blue Front Strategies	805 15th Street NW	Washington DC	20005	\$	13,993.02	Strategy Consulting
3/29/11	Blue Front Strategies	805 15th Street NW	Washington DC	20005	\$	136,766.50	Strategy Consulting
3/30/11	The Hartford	PO Box 2907	Hartford CT	6104	\$	428.00	Insurance
3/30/11	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$	1,162.60	Payroll Fees
3/30/11	Tronconi, Segarra & Hore	8321 Main Street	Williamsville NY	14221	\$	2,350.00	Accounting
3/30/11	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$	2,369.66	Payroll Fees
3/30/11	Patton Boggs, LLP	2550 M St NW	Washington DC	20037	\$	6,611.09	Legal fees
3/30/11	Norway Hill Associates	30 Norway Hill	Hancock NH	3449	\$	12,500.00	Strategy Consulting
3/31/11	Stephen DeMaura	66 Canal Center Plaza	Alexandria VA	22314	\$	224.95	Reimbursement
4/4/11	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria VA	22314	\$	97,946.20	Media placement
4/5/11	Jason Killian Meath	1625 Eye Street NW	Washington DC	20006	\$	25,702.50	Media production
4/6/11	ADP Payroll Fees	1 ADP Boulevard	Roseland NJ	7068	\$	60.27	Payroll Fees
4/6/11	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria VA	22314	\$	2,725.63	Health Insurance
4/6/11	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria VA	22314	\$	116,085.70	Media placement
4/7/11	The Black Rock Group	66 Canal Center Plaza	Alexandria VA	22314	\$	13,250.00	Communications consulting
4/8/11	Jason Killian Meath	1625 Eye Street NW	Washington DC	20006	\$	16,855.00	Media production
4/12/11	First Wave Concepts	4258 Mayfair Lane	Port Orange FL	32129	\$	350.00	Digital consulting
4/14/11	PMA Properties, 815, LLC	1600 Prince St, #109	Alexandria VA	22314	\$	894.00	Rent
4/14/11	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$	1,162.61	Payroll Fees
4/14/11	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$	2,369.66	Payroll Fees
4/18/11	DC Treasurer	1101 4th Street SW, Suite 850W	Washington DC	20024	\$	25.00	Fee
4/19/11	Patton Boggs, LLP	2550 M St NW	Washington DC	20037	\$	5,485.05	Legal fees
4/19/11	Taxpayers Protection Alliance	108 N. Alfred Street	Alexandria VA	22314	\$	15,000.00	Contribution
4/20/11	ADP Payroll Fees	1 ADP Boulevard	Roseland NJ	7068	\$	70.77	Payroll Fees
4/20/11	Blue Front Strategies	805 15th Street NW	Washington DC	20005	\$	17,175.31	Strategy Consulting
4/20/11	Blue Front Strategies	805 15th Street NW	Washington DC	20005	\$	101,340.00	Strategy Consulting
4/20/11	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria VA	22314	\$	139,040.10	Media placement
4/26/11	DC Treasurer	1101 4th Street SW, Suite 850W	Washington DC	20024	\$	75.00	Fee
4/26/11	Norway Hill Associates	30 Norway Hill	Hancock NH	3449	\$	12,500.00	Strategy Consulting
4/27/11	Stephen DeMaura	66 Canal Center Plaza	Alexandria VA	22314	\$	31.00	Reimbursement
4/29/11	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$	1,162.62	Payroll Fees

4/29/11	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$ 2,369.65	Payroll Fees
4/29/11	Northwestern Mutual	720 East Wisconsin Ave.	Milwaukee WI	53202	\$ 3,896.26	Insurance
4/29/11	The Black Rock Group	66 Canal Center Plaza	Alexandria VA	22314	\$ 13,250.00	Communications consulting
5/2/11	Jeff Brownlee				\$ 100.00	Research Consulting
5/3/11	Jason Killian Meath	1625 Eye Street NW	Washington DC	20006	\$ 7,450.00	Media production
5/4/11	ADP Payroll Fees	1 ADP Boulevard	Roseland NJ	7068	\$ 60.27	Payroll Fees
5/5/11	Blue Front Strategies	805 15th Street NW	Washington DC	20005	\$ 4,604.67	Strategy Consulting
5/6/11	Retail Industry Leaders Association	99 M St. SE	Washington DC	20003	\$ 21,769.43	Contribution refund
5/10/11	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria VA	22314	\$ 2,725.63	Health Insurance
5/11/11	Taxpayers Protection Alliance	108 N. Aldred Street	Alexandria VA	22314	\$ 15,000.00	Contribution
5/11/11	Margaret Lauderback				\$ 51,000.00	Fundraising Services
5/12/11	Patton Boggs, LLP	2550 M St NW	Washington DC	20037	\$ 1,850.95	Legal fees
5/13/11	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$ 11,236.18	Payroll Fees
5/13/11	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$ 14,562.49	Payroll Fees
5/18/11	ADP Payroll Fees	1 ADP Boulevard	Roseland NJ	7068	\$ 61.64	Payroll Fees
5/18/11	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria VA	22314	\$ 142,975.50	Media placement
5/19/11	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria VA	22314	\$ 40,525.00	Media placement
5/20/11	American Courier	815 N. Royal St. #210	Alexandria VA	22314	\$ 52.00	Courier Service
5/23/11	Verizon Wireless	PO Box 408	Newark NJ	7101	\$ 152.50	Telephone service
5/24/11	American Express	200 Vesey Street	New York NY	10281	\$ 3,754.66	Credit card expense
5/25/11	First Wave Concepts	4258 Mayfair Lane	Port Orange FL	32129	\$ 750.00	Digital consulting
5/26/11	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria VA	22314	\$ 10,323.53	Media placement
5/26/11	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria VA	22314	\$ 21,836.77	Media placement
5/26/11	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria VA	22314	\$ 31,500.00	Media placement
5/31/11	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$ 1,162.61	Payroll Fees
5/31/11	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$ 2,369.66	Payroll Fees
5/31/11	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria VA	22314	\$ 48,657.59	Media placement
6/1/11	PMA Properties, 815, LLC	1600 Prince St. #109	Alexandria VA	22314	\$ 894.00	Rent
6/1/11	PMA Properties, 815, LLC	1600 Prince St. #109	Alexandria VA	22314	\$ 894.00	Rent
6/3/11	Paypal	2211 N. 1st Street	San Jose CA	95131	\$ 30.00	Credit card processing fee
6/8/11	ADP Payroll Fees	1 ADP Boulevard	Roseland NJ	7068	\$ 60.27	Payroll Fees
6/8/11	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria VA	22314	\$ 2,725.63	Health Insurance
6/13/11	The Black Rock Group	66 Canal Center Plaza	Alexandria VA	22314	\$ 13,250.00	Communications consulting
6/14/11	Birch, Horton, Bittner & Cherot	1100 Connecticut Ave, NW Suite 825	Washington DC	20036	\$ 152.51	Legal Fees
6/14/11	Patton Boggs, LLP	2550 M St NW	Washington DC	20037	\$ 1,189.50	Legal fees
6/14/11	American Express	200 Vesey Street	New York NY	10281	\$ 1,210.28	Credit card expense
6/14/11	Margaret Lauderback				\$ 40,000.00	Fundraising Services
6/15/11	Blue Front Strategies	805 15th Street NW	Washington DC	20005	\$ 573.00	Strategy Consulting
6/15/11	Tranconi, Segarra & Hore	8321 Main Street	Williamsville NY	14221	\$ 900.00	Accounting
6/15/11	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$ 1,162.60	Payroll Fees
6/15/11	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$ 2,369.66	Payroll Fees
6/16/11	Spectrum Marketing Company	95 Eddy Rd	Manchester NH	3102	\$ 100.00	Printing, Design & Postage
6/16/11	NH Journal, LLC				\$ 375.00	Advertising
6/17/11	Taxpayers Protection Alliance	108 N. Aldred Street	Alexandria VA	22314	\$ 25,000.00	Contribution
6/20/11	Verizon Wireless	PO Box 408	Newark NJ	7101	\$ 151.00	Telephone service
6/21/11	Birch, Horton, Bittner & Cherot	1100 Connecticut Ave, NW Suite 825	Washington DC	20036	\$ 350.84	Legal Fees
6/21/11	First Wave Concepts	4258 Mayfair Lane	Port Orange FL	32129	\$ 4,575.00	Digital consulting
6/22/11	ADP Payroll Fees	1 ADP Boulevard	Roseland NJ	7068	\$ 60.27	Payroll Fees
6/23/11	Hynes Communications	PO Box 4097	Portsmouth NH	3802	\$ 6,000.00	Communications consulting
6/28/11	Norway Hill Associates	30 Norway Hill	Hancock NH	3449	\$ 12,500.00	Strategy Consulting
6/29/11	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$ 1,162.61	Payroll Fees
6/29/11	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$ 2,369.66	Payroll Fees
7/5/11	Paypal	2211 N. 1st Street	San Jose CA	95131	\$ 30.00	Credit card processing fee
7/7/11	ADP Payroll Fees	1 ADP Boulevard	Roseland NJ	7068	\$ 63.77	Payroll Fees
7/7/11	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria VA	22314	\$ 2,743.62	Health Insurance
7/8/11	The Black Rock Group	66 Canal Center Plaza	Alexandria VA	22314	\$ 13,250.00	Communications consulting
7/11/11	American Express	200 Vesey Street	New York NY	10281	\$ 5,544.35	Credit card expense
7/12/11	Richard Sales Media, LLC	2375 E. Camelback Rd. Suite 600	Phoenix AZ	85016	\$ 2,250.00	Media production
7/12/11	Norway Hill Associates	30 Norway Hill	Hancock NH	3449	\$ 12,500.00	Strategy Consulting
7/14/11	First Wave Concepts	4258 Mayfair Lane	Port Orange FL	32129	\$ 1,150.00	Digital consulting
7/14/11	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$ 1,162.61	Payroll Fees
7/14/11	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$ 2,369.66	Payroll Fees
7/20/11	ADP Payroll Fees	1 ADP Boulevard	Roseland NJ	7068	\$ 74.27	Payroll Fees
7/27/11	DC Treasurer	1101 4th Street SW, Suite 850W	Washington DC	20024	\$ 95.00	Fees
7/27/11	Patton Boggs, LLP	2550 M St NW	Washington DC	20037	\$ 5,677.91	Legal fees
7/28/11	Verizon Wireless	PO Box 408	Newark NJ	7101	\$ 153.16	Telephone service
7/28/11	The Black Rock Group	66 Canal Center Plaza	Alexandria VA	22314	\$ 13,250.00	Communications consulting
7/29/11	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$ 1,162.60	Payroll Fees
7/29/11	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$ 2,369.66	Payroll Fees
7/29/11	Northwestern Mutual	720 East Wisconsin Ave.	Milwaukee WI	53202	\$ 3,896.26	Insurance
8/1/11	Norway Hill Associates	30 Norway Hill	Hancock NH	3449	\$ 12,500.00	Strategy Consulting
8/2/11	Hackney & Hackney	1503 W. 31st Street	Anchorage AK	99517	\$ 4,500.00	Media production
8/3/11	Paypal	2211 N. 1st Street	San Jose CA	95131	\$ 30.00	Credit card processing fee
8/3/11	ADP Payroll Fees	1 ADP Boulevard	Roseland NJ	7068	\$ 63.77	Payroll Fees
8/4/11	Pat Mithran				\$ 175.00	Consulting
8/12/11	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$ 1,162.61	Payroll Fees
8/12/11	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$ 2,369.66	Payroll Fees
8/17/11	ADP Payroll Fees	1 ADP Boulevard	Roseland NJ	7068	\$ 63.77	Payroll Fees
8/17/11	American Express	200 Vesey Street	New York NY	10281	\$ 19,450.76	Credit card expense
8/19/11	Internal Revenue Service	PO Box 409101	Ogden UT	84409	\$ 329.00	Fees
8/19/11	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria VA	22314	\$ 2,714.62	Health Insurance
8/22/11	Verizon Wireless	PO Box 408	Newark NJ	7101	\$ 244.61	Telephone service
8/30/11	Caleb Bacon				\$ 750.00	Service
8/30/11	Josh Stois				\$ 750.00	Event management
8/30/11	Nitch Carney				\$ 850.00	Event management
8/30/11	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$ 1,162.60	Payroll Fees
8/30/11	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$ 2,369.66	Payroll Fees
9/1/11	Patton Boggs, LLP	2550 M St NW	Washington DC	20037	\$ 3,553.50	Legal fees
9/7/11	Norway Hill Associates	30 Norway Hill	Hancock NH	3449	\$ 12,500.00	Strategy Consulting
9/8/11	Paypal	2211 N. 1st Street	San Jose CA	95131	\$ 30.00	Credit card processing fee
9/8/11	ADP Payroll Fees	1 ADP Boulevard	Roseland NJ	7068	\$ 63.77	Payroll Fees
9/12/11	Ben Bacon				\$ 1,750.00	Event management
9/12/11	American Express	200 Vesey Street	New York NY	10281	\$ 5,451.85	Credit card expense

9/12/11	The Black Rock Group	66 Canal Center Plaza	Alexandria	VA	22314	\$	13,250.00	Communications consulting
9/14/11	ADP Tax	1 ADP Boulevard	Roseland	NJ	7068	\$	2,051.36	Payroll Fees
9/14/11	ADP Tax	1 ADP Boulevard	Roseland	NJ	7068	\$	3,555.41	Payroll Fees
9/15/11	First Wave Concepts	4258 Mayfair Lane	Port Orange	FL	32129	\$	50.00	Digital consulting
9/21/11	ADP Payroll Fees	1 ADP Boulevard	Roseland	NJ	7068	\$	63.77	Payroll Fees
9/29/11	ADP Tax	1 ADP Boulevard	Roseland	NJ	7068	\$	2,051.36	Payroll Fees
9/29/11	ADP Tax	1 ADP Boulevard	Roseland	NJ	7068	\$	3,555.41	Payroll Fees
10/3/11	Paypal	2211 N. 1st Street	San Jose	CA	95131	\$	30.00	Credit card processing fee
10/5/11	ADP Payroll Fees	1 ADP Boulevard	Roseland	NJ	7068	\$	63.77	Payroll Fees
10/6/11	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria	VA	22314	\$	2,714.62	Health Insurance
10/6/11	The Black Rock Group	66 Canal Center Plaza	Alexandria	VA	22314	\$	13,250.00	Communications consulting
10/11/11	American Courier	815 N. Royal St. #210	Alexandria	VA	22314	\$	38.00	Courier Service
10/11/11	City of Alexandria	301 King Street	Alexandria	VA	22314	\$	132.14	Fee
10/11/11	Verizon Wireless	PO Box 408	Newark	NJ	7101	\$	178.83	Telephone service
10/11/11	Patton Boggs, LLP	2550 M St NW	Washington	DC	20037	\$	842.71	Legal fees
10/11/11	American Express	200 Vessey Street	New York	NY	10281	\$	3,489.69	Credit card expense
10/12/11	State Corporation Commission	1300 E. Main St.	Richmond	VA	23219	\$	25.00	Fee
10/12/11	Corporate Services Company	251 Little Falls Drive	Wilmington	DE	19808	\$	582.00	Fee
10/12/11	Chi Herot Fraternity					\$	750.00	Rental
10/12/11	WVP Strategies	PO Box 24215	Lansing	MI	48909	\$	1,740.04	Communications consulting
10/12/11	Stephen DeMaura	66 Canal Center Plaza	Alexandria	VA	22314	\$	2,250.00	Reimbursement
10/12/11	Tronconi, Segarra & Hore	8321 Main Street	Williamsport	NY	14221	\$	2,600.00	Accounting
10/12/11	Northwestern Mutual	720 East Wisconsin Ave.	Milwaukee	WI	53202	\$	4,784.26	Insurance
10/13/11	DC Treasurer	1101 4th Street SW, Suite 850W	Washington	DC	20024	\$	25.00	Fee
10/13/11	WSB, Inc.	11 A. St.	Derry	NH	3038	\$	11,000.00	Media placement
10/14/11	ADP Tax	1 ADP Boulevard	Roseland	NJ	7068	\$	2,051.35	Payroll Fees
10/14/11	ADP Tax	1 ADP Boulevard	Roseland	NJ	7068	\$	3,555.41	Payroll Fees
10/17/11	Washingtonian	1828 L St. NW, #200	Washington	DC	20036	\$	29.95	Subscription
10/17/11	First Wave Concepts	4258 Mayfair Lane	Port Orange	FL	32129	\$	265.00	Digital consulting
10/17/11	First Wave Concepts	4258 Mayfair Lane	Port Orange	FL	32129	\$	350.00	Digital consulting
10/18/11	Inc.	7 World Trade Center	New York	NY	10007	\$	5.00	Subscription
10/19/11	ADP Payroll Fees	1 ADP Boulevard	Roseland	NJ	7068	\$	74.27	Payroll Fees
10/21/11	Norway Hill Associates	30 Norway Hill	Hancock	NH	3449	\$	12,500.00	Strategy Consulting
10/31/11	ADP Tax	1 ADP Boulevard	Roseland	NJ	7068	\$	2,051.36	Payroll Fees
10/31/11	ADP Tax	1 ADP Boulevard	Roseland	NJ	7068	\$	3,555.41	Payroll Fees
10/31/11	Northwestern Mutual	720 East Wisconsin Ave.	Milwaukee	WI	53202	\$	3,896.26	Insurance
11/3/11	Paypal	2211 N. 1st Street	San Jose	CA	95131	\$	30.00	Credit card processing fee
11/8/11	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria	VA	22314	\$	2,693.49	Health Insurance
11/8/11	The Black Rock Group	66 Canal Center Plaza	Alexandria	VA	22314	\$	13,250.00	Communications consulting
11/9/11	ADP Payroll Fees	1 ADP Boulevard	Roseland	NJ	7068	\$	63.77	Payroll Fees
11/9/11	WVP Strategies	PO Box 24215	Lansing	MI	48909	\$	6,703.99	Communications consulting
11/10/11	Verizon Wireless	PO Box 408	Newark	NJ	7101	\$	178.83	Telephone service
11/10/11	American Express	200 Vessey Street	New York	NY	10281	\$	5,680.86	Credit card expense
11/14/11	City of Alexandria	301 King Street	Alexandria	VA	22314	\$	13.25	Fee
11/14/11	Corporate Services Company	251 Little Falls Drive	Wilmington	DE	19808	\$	582.00	Fee
11/14/11	Patton Boggs, LLP	2550 M St NW	Washington	DC	20037	\$	783.25	Legal fees
11/14/11	The Hartford	PO Box 2907	Hartford	CT	6104	\$	1,634.00	Insurance
11/15/11	ADP Tax	1 ADP Boulevard	Roseland	NJ	7068	\$	2,051.36	Payroll Fees
11/15/11	ADP Tax	1 ADP Boulevard	Roseland	NJ	7068	\$	3,555.41	Payroll Fees
11/15/11	Norway Hill Associates	30 Norway Hill	Hancock	NH	3449	\$	12,500.00	Strategy Consulting
11/15/11	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria	VA	22314	\$	45,073.80	Media placement
11/17/11	Bloomberg Markets	731 Lexington Ave	New York	NY	10022	\$	29.95	Subscription
11/22/11	Verizon Wireless	PO Box 408	Newark	NJ	7101	\$	321.84	Telephone service
11/22/11	Arena Communications	1780 Sequoia Vista Circle	Salt Lake City	UT	84104	\$	2,000.00	Printing, Design & Postage
11/23/11	ADP Payroll Fees	1 ADP Boulevard	Roseland	NJ	7068	\$	63.77	Payroll Fees
11/29/11	Forbes	499 Washington Blvd	Jersey City	NJ	7310	\$	61.95	Subscription
11/29/11	ADP Tax	1 ADP Boulevard	Roseland	NJ	7068	\$	2,051.36	Payroll Fees
11/29/11	ADP Tax	1 ADP Boulevard	Roseland	NJ	7068	\$	3,555.41	Payroll Fees
11/30/11	ADP Payroll Fees	1 ADP Boulevard	Roseland	NJ	7068	\$	63.77	Payroll Fees
12/5/11	Paypal	2211 N. 1st Street	San Jose	CA	95131	\$	30.00	Credit card processing fee
12/9/11	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria	VA	22314	\$	2,693.49	Health Insurance
12/9/11	The Black Rock Group	66 Canal Center Plaza	Alexandria	VA	22314	\$	13,250.00	Communications consulting
12/15/11	ADP Tax	1 ADP Boulevard	Roseland	NJ	7068	\$	1,755.74	Payroll Fees
12/15/11	ADP Tax	1 ADP Boulevard	Roseland	NJ	7068	\$	3,674.79	Payroll Fees
12/19/11	Norway Hill Associates	30 Norway Hill	Hancock	NH	3449	\$	12,500.00	Strategy Consulting
12/21/11	ADP Payroll Fees	1 ADP Boulevard	Roseland	NJ	7068	\$	63.77	Payroll Fees
12/23/11	American Express	200 Vessey Street	New York	NY	10281	\$	1,418.27	Credit card expense
12/27/11	DC Treasurer	1101 4th Street SW, Suite 850W	Washington	DC	20024	\$	60.00	Fee
12/27/11	Arena Communications	1780 Sequoia Vista Circle	Salt Lake City	UT	84104	\$	1,000.00	Printing, Design & Postage
12/28/11	Chubb Group of Insurance Companies	PO Box 7247	Philadelphia	PA	19170	\$	1,875.00	Insurance
12/29/11	ADP Tax	1 ADP Boulevard	Roseland	NJ	7068	\$	1,509.71	Payroll Fees
12/29/11	ADP Tax	1 ADP Boulevard	Roseland	NJ	7068	\$	3,774.15	Payroll Fees
1/1/12	Global Policy Solutions	27319 Julietta Lane	Los Altos Hill	CA	94022	\$	5,000.00	Strategy Consulting
1/3/12	Paypal	2211 N. 1st Street	San Jose	CA	95131	\$	30.00	Credit card processing fee
1/3/12	First Wave Concepts	4258 Mayfair Lane	Port Orange	FL	32129	\$	575.00	Digital consulting
1/3/12	Chubb Group of Insurance Companies	PO Box 7247	Philadelphia	PA	19170	\$	1,875.00	Insurance
1/9/12	ADP Payroll Fees	1 ADP Boulevard	Roseland	NJ	7068	\$	63.77	Payroll Fees
1/12/12	The Wall Street Journal	1211 Avenue of the Americas	New York	NY	10036	\$	119.88	Subscription
1/12/12	Hackney & Hackney	1503 W. 31st Street	Anchorage	AK	99517	\$	1,888.10	Media production
1/12/12	The Black Rock Group	66 Canal Center Plaza	Alexandria	VA	22314	\$	13,250.00	Communications consulting
1/12/12	Patton Boggs, LLP	2550 M St NW	Washington	DC	20037	\$	24,248.00	Legal fees
1/13/12	ADP Tax	1 ADP Boulevard	Roseland	NJ	7068	\$	2,116.40	Payroll Fees
1/13/12	ADP Tax	1 ADP Boulevard	Roseland	NJ	7068	\$	3,564.85	Payroll Fees
1/18/12	Wired	PO Box 37705	Boone	IA	50037	\$	10.00	Subscription
1/18/12	ADP Payroll Fees	1 ADP Boulevard	Roseland	NJ	7068	\$	50.90	Payroll Fees
1/19/12	ADP Payroll Fees	1 ADP Boulevard	Roseland	NJ	7068	\$	63.77	Payroll Fees
1/20/12	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria	VA	22314	\$	2,693.49	Health Insurance
1/24/12	Internal Revenue Service	PO Box 409101	Ogden	UT	84409	\$	14.47	Fees
1/27/12	Dionysus Consulting, LLC	645 Alwick Ave	West Islip	NY	11795	\$	8,000.00	Consulting
1/30/12	ADP Tax	1 ADP Boulevard	Roseland	NJ	7068	\$	21.00	Payroll Fees
1/30/12	First Wave Concepts	4258 Mayfair Lane	Port Orange	FL	32129	\$	50.00	Digital consulting
1/31/12	ADP Tax	1 ADP Boulevard	Roseland	NJ	7068	\$	2,075.83	Payroll Fees
1/31/12	ADP Tax	1 ADP Boulevard	Roseland	NJ	7068	\$	3,564.85	Payroll Fees

1/31/12	Northwestern Mutual	720 East Wisconsin Ave.	Milwaukee	WI	53202	\$	15,142.87	Insurance
2/2/12	Paypal	2211 N. 1st Street	San Jose	CA	95131	\$	30.00	Credit card processing fee
2/7/12	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria	VA	22314	\$	2,686.23	Health Insurance
2/8/12	ADP Payroll Fees	1 ADP Boulevard	Roseland	NJ	7068	\$	63.77	Payroll Fees
2/8/12	The Black Rock Group	66 Canal Center Plaza	Alexandria	VA	22314	\$	13,250.00	Communications consulting
2/9/12	American Express	200 Vesey Street	New York	NY	10281	\$	5,062.36	Credit card expense
2/13/12	Stephen DeMauro	66 Canal Center Plaza	Alexandria	VA	22314	\$	180.08	Reimbursement
2/15/12	ADP Tax	1 ADP Boulevard	Roseland	NJ	7068	\$	2,041.92	Payroll Fees
2/15/12	ADP Tax	1 ADP Boulevard	Roseland	NJ	7068	\$	3,564.85	Payroll Fees
2/15/12	Norway Hill Associates	30 Norway Hill	Hancock	NH	3449	\$	12,500.00	Strategy Consulting
2/18/12	ADP Tax	1 ADP Boulevard	Roseland	NJ	7068	\$	75.64	Payroll Fees
2/23/12	ADP Payroll Fees	1 ADP Boulevard	Roseland	NJ	7068	\$	63.77	Payroll Fees
2/28/12	ADP Tax	1 ADP Boulevard	Roseland	NJ	7068	\$	2,041.92	Payroll Fees
2/28/12	ADP Tax	1 ADP Boulevard	Roseland	NJ	7068	\$	3,564.85	Payroll Fees
3/2/12	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria	VA	22314	\$	2,696.86	Health Insurance
3/5/12	Paypal	2211 N. 1st Street	San Jose	CA	95131	\$	30.00	Credit card processing fee
3/5/12	Verizon Wireless	PO Box 408	Newark	NJ	7101	\$	156.42	Telephone service
3/6/12	Norway Hill Associates	30 Norway Hill	Hancock	NH	3449	\$	12,500.00	Strategy Consulting
3/6/12	Patton Boggs, LLP	2550 M St NW	Washington	DC	20037	\$	12,545.15	Legal fees
3/6/12	The Black Rock Group	66 Canal Center Plaza	Alexandria	VA	22314	\$	13,250.00	Communications consulting
3/7/12	ADP Payroll Fees	1 ADP Boulevard	Roseland	NJ	7068	\$	63.77	Payroll Fees
3/14/12	ADP Tax	1 ADP Boulevard	Roseland	NJ	7068	\$	2,041.92	Payroll Fees
3/14/12	ADP Tax	1 ADP Boulevard	Roseland	NJ	7068	\$	3,564.85	Payroll Fees
3/21/12	ADP Payroll Fees	1 ADP Boulevard	Roseland	NJ	7068	\$	63.77	Payroll Fees
3/27/12	First Wave Concepts	4258 Mayfair Lane	Port Orange	FL	32129	\$	50.00	Digital consulting
3/29/12	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria	VA	22314	\$	2,696.86	Health Insurance
3/29/12	American Express	200 Vesey Street	New York	NY	10281	\$	20,041.70	Credit card expense
3/30/12	ADP Tax	1 ADP Boulevard	Roseland	NJ	7068	\$	2,041.91	Payroll Fees
3/30/12	ADP Tax	1 ADP Boulevard	Roseland	NJ	7068	\$	3,564.85	Payroll Fees
4/2/12	Paypal	2211 N. 1st Street	San Jose	CA	95131	\$	30.00	Credit card processing fee
4/2/12	Verizon Wireless	PO Box 408	Newark	NJ	7101	\$	152.04	Telephone service
4/3/12	DC Treasurer	1101 4th Street SW, Suite 850W	Washington	DC	20024	\$	125.00	Fee
4/4/12	Arlington County Treasurer	2100 Clarendon Blvd, #201	Arlington	VA	22201	\$	35.00	Fee
4/4/12	ADP Payroll Fees	1 ADP Boulevard	Roseland	NJ	7068	\$	63.77	Payroll Fees
4/4/12	Holmes Weddle & Barcott	701 W. 8th Avenue, Suite 700	Anchorage	AK	99501	\$	1,225.00	Legal fees
4/9/12	American Courier	815 N. Royal St, #210	Alexandria	VA	22314	\$	26.00	Courier Service
4/9/12	First Wave Concepts	4258 Mayfair Lane	Port Orange	FL	32129	\$	50.00	Digital consulting
4/9/12	Martin Morse Wooster					\$	1,235.00	Consulting
4/9/12	American Express	200 Vesey Street	New York	NY	10281	\$	1,721.22	Credit card expense
4/9/12	Patton Boggs, LLP	2550 M St NW	Washington	DC	20037	\$	10,140.00	Legal fee
4/9/12	The Black Rock Group	66 Canal Center Plaza	Alexandria	VA	22314	\$	13,250.00	Communications consulting
4/11/12	Norway Hill Associates	30 Norway Hill	Hancock	NH	3449	\$	1,481.30	Strategy Consulting
4/11/12	Norway Hill Associates	30 Norway Hill	Hancock	NH	3449	\$	12,500.00	Strategy Consulting
4/13/12	ADP Tax	1 ADP Boulevard	Roseland	NJ	7068	\$	2,359.31	Payroll Fees
4/13/12	ADP Tax	1 ADP Boulevard	Roseland	NJ	7068	\$	4,571.56	Payroll Fees
4/17/12	Stephen DeMauro	66 Canal Center Plaza	Alexandria	VA	22314	\$	42.00	Reimbursement
4/17/12	Stephen DeMauro	66 Canal Center Plaza	Alexandria	VA	22314	\$	3,555.41	Reimbursement
4/17/12	NMB Research	214 N. Fayette St	Alexandria	VA	22314	\$	58,000.00	Survey research
4/19/12	Gateway Ventures, Inc.	6682 W. Greenfield Ave	Milwaukee	WI	53214	\$	3,750.00	Strategy Consulting
4/30/12	ADP Tax	1 ADP Boulevard	Roseland	NJ	7068	\$	2,041.91	Payroll Fees
4/30/12	ADP Tax	1 ADP Boulevard	Roseland	NJ	7068	\$	3,564.85	Payroll Fees
5/7/12	American Courier	815 N. Royal St, #210	Alexandria	VA	22314	\$	52.00	Courier Service
5/7/12	The Black Rock Group	66 Canal Center Plaza	Alexandria	VA	22314	\$	13,250.00	Communications consulting
5/8/12	Verizon Wireless	PO Box 408	Newark	NJ	7101	\$	151.95	Telephone service
5/8/12	Vandenberg & Associates	3927 Elm Ave	Long Beach	CA	90807	\$	10,000.00	Fundraising Services
5/9/12	Paypal	2211 N. 1st Street	San Jose	CA	95131	\$	30.00	Credit card processing fee
5/9/12	ADP Payroll Fees	1 ADP Boulevard	Roseland	NJ	7068	\$	63.77	Payroll Fees
5/11/12	Arena Communications	1780 Sequoia Vista Circle	Salt Lake City	UT	84104	\$	2,634.00	Printing, Design & Postage
5/11/12	Arena Communications	1780 Sequoia Vista Circle	Salt Lake City	UT	84104	\$	7,225.00	Printing, Design & Postage
5/11/12	Arena Communications	1780 Sequoia Vista Circle	Salt Lake City	UT	84104	\$	7,225.00	Printing, Design & Postage
5/14/12	Inc.	7 World Trade Center	New York	NY	10007	\$	7.00	Subscription
5/14/12	ADP Tax	1 ADP Boulevard	Roseland	NJ	7068	\$	2,041.92	Payroll Fees
5/14/12	ADP Tax	1 ADP Boulevard	Roseland	NJ	7068	\$	3,564.85	Payroll Fees
5/15/12	Norway Hill Associates	30 Norway Hill	Hancock	NH	3449	\$	12,500.00	Strategy Consulting
5/17/12	Gateway Ventures, Inc.	6682 W. Greenfield Ave	Milwaukee	WI	53214	\$	1,500.00	Strategy Consulting
5/22/12	First Wave Concepts	4258 Mayfair Lane	Port Orange	FL	32129	\$	75.00	Digital consulting
5/23/12	ADP Payroll Fees	1 ADP Boulevard	Roseland	NJ	7068	\$	63.77	Payroll Fees
5/24/12	Verizon Wireless	PO Box 408	Newark	NJ	7101	\$	157.00	Telephone service
5/24/12	American Express	200 Vesey Street	New York	NY	10281	\$	3,263.31	Credit card expense
5/24/12	Patton Boggs, LLP	2550 M St NW	Washington	DC	20037	\$	11,203.75	Legal fees
5/29/12	First Wave Concepts	4258 Mayfair Lane	Port Orange	FL	32129	\$	2,500.00	Digital consulting
5/30/12	ADP Tax	1 ADP Boulevard	Roseland	NJ	7068	\$	2,041.92	Payroll Fees
5/30/12	ADP Tax	1 ADP Boulevard	Roseland	NJ	7068	\$	3,564.85	Payroll Fees
5/31/12	ADP Payroll Fees	1 ADP Boulevard	Roseland	NJ	7068	\$	63.77	Payroll Fees
6/1/12	Vandenberg & Associates	3927 Elm Ave	Long Beach	CA	90807	\$	10,000.00	Fundraising Services
6/4/12	Paypal	2211 N. 1st Street	San Jose	CA	95131	\$	30.00	Credit card processing fee
6/5/12	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria	VA	22314	\$	2,696.86	Health Insurance
6/6/12	Vandenberg & Associates	3927 Elm Ave	Long Beach	CA	90807	\$	10,000.00	Fundraising Services
6/6/12	The Black Rock Group	66 Canal Center Plaza	Alexandria	VA	22314	\$	13,250.00	Communications consulting
6/7/12	Taxpayers Protection Alliance	108 N. Aldred Street	Alexandria	VA	22314	\$	140,902.00	Contribution
6/8/12	American Express	200 Vesey Street	New York	NY	10281	\$	5,286.79	Credit card expense
6/8/12	Patton Boggs, LLP	2550 M St NW	Washington	DC	20037	\$	41,402.50	Legal fees
6/11/12	First Wave Concepts	4258 Mayfair Lane	Port Orange	FL	32129	\$	3,890.00	Digital consulting
6/12/12	Arena Communications	1780 Sequoia Vista Circle	Salt Lake City	UT	84104	\$	2,791.00	Printing, Design & Postage
6/13/12	Tarbell Companies, Inc.	66 Canal Center Plaza	Alexandria	VA	22314	\$	9,075.00	Google Ads, Reimbursed Expense
6/14/12	Stephen DeMauro	66 Canal Center Plaza	Alexandria	VA	22314	\$	159.85	Reimbursement
6/14/12	Vandenberg & Associates	3927 Elm Ave	Long Beach	CA	90807	\$	10,000.00	Fundraising Services
6/15/12	UPS	55 Glenlake Parkway	Atlanta	GA	30328	\$	30.00	Shipping cost
6/15/12	ADP Tax	1 ADP Boulevard	Roseland	NJ	7068	\$	2,041.91	Payroll Fees
6/15/12	ADP Tax	1 ADP Boulevard	Roseland	NJ	7068	\$	3,564.85	Payroll Fees
6/15/12	Norway Hill Associates	30 Norway Hill	Hancock	NH	3449	\$	12,500.00	Strategy Consulting
6/20/12	ADP Payroll Fees	1 ADP Boulevard	Roseland	NJ	7068	\$	63.77	Payroll Fees

6/26/12	NMB Research	214 N. Fayette St	Alexandria	VA	22314	\$	13,000.00	Survey research
6/29/12	ADP Tax	1 ADP Boulevard	Roseland	NJ	7068	\$	2,041.92	Payroll Fees
6/29/12	ADP Tax	1 ADP Boulevard	Roseland	NJ	7068	\$	3,564.85	Payroll Fees
7/5/12	ADP Payroll Fees	1 ADP Boulevard	Roseland	NJ	7068	\$	63.77	Payroll Fees
7/10/12	The Business Bank	133 Maple Avenue East	Vienna	VA	22180	\$	20.00	Wire Fee
7/10/12	Taxpayers Protection Alliance	108 N. Aldred Street	Alexandria	VA	22314	\$	193,000.00	Contribution
7/11/12	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria	VA	22314	\$	2,696.86	Health Insurance
7/11/12	The Black Rock Group	66 Canal Center Plaza	Alexandria	VA	22314	\$	13,250.00	
7/12/12	American Courier	815 N. Royal St, #210	Alexandria	VA	22314	\$	10.00	Courier Service
7/13/12	Verizon Wireless	PO Box 408	Newark	NJ	7101	\$	151.98	Telephone service
7/13/12	ADP Tax	1 ADP Boulevard	Roseland	NJ	7068	\$	2,041.92	Payroll Fees
7/13/12	ADP Tax	1 ADP Boulevard	Roseland	NJ	7068	\$	3,564.85	Payroll Fees
7/13/12	American Express	200 Vesey Street	New York	NY	10281	\$	5,698.54	Credit card expense
7/16/12	Bloomberg Markets	731 Lexington Ave	New York	NY	10022	\$	30.00	Subscription
7/16/12	First Wave Concepts	4258 Mayfair Lane	Port Orange	FL	32129	\$	75.00	Digital consulting
7/16/12	Clark Hill	601 Pennsylvania Ave	Washington	DC	20004	\$	8,955.00	Legal Fees
7/16/12	Norway Hill Associates	30 Norway Hill	Hancock	NH	3449	\$	12,500.00	Strategy Consulting
7/16/12	Patton Boggs, LLP	2550 M St NW	Washington	DC	20037	\$	27,437.82	Legal fees
7/17/12	Capitol Consulting and Strategy	1301 I Street	Sacramento	CA	95814	\$	19,395.33	Strategy Consulting
7/17/12	ID Media Partners	1717 I Street	Sacramento	CA	95811	\$	155,000.00	Digital media placement
7/18/12	The Business Bank	133 Maple Avenue East	Vienna	VA	22180	\$	20.00	Wire Fee
7/18/12	Wired	PO Box 37705	Boone	IA	50037	\$	20.00	Subscription
7/18/12	ADP Payroll Fees	1 ADP Boulevard	Roseland	NJ	7068	\$	78.02	Payroll Fees
7/19/12	Capitol Consulting and Strategy	1301 I Street	Sacramento	CA	95814	\$	68,000.00	Strategy Consulting
7/23/12	American Courier	815 N. Royal St, #210	Alexandria	VA	22314	\$	30.00	Courier Service
7/23/12	Verizon Wireless	PO Box 408	Newark	NJ	7101	\$	170.39	Telephone service
7/24/12	Stephen DeMaura	66 Canal Center Plaza	Alexandria	VA	22314	\$	103.88	Travel reimbursement
7/25/12	The Business Bank	133 Maple Avenue East	Vienna	VA	22180	\$	20.00	Wire Fee
7/26/12	City of Alexandria	301 King Street	Alexandria	VA	22314	\$	40.00	Fee
7/27/12	Capitol Consulting and Strategy	1301 I Street	Sacramento	CA	95814	\$	500.00	Strategy Consulting
7/30/12	ADP Tax	1 ADP Boulevard	Roseland	NJ	7068	\$	2,041.92	Payroll Fees
7/30/12	ADP Tax	1 ADP Boulevard	Roseland	NJ	7068	\$	3,464.85	Payroll Fees
7/30/12	Vandenberg & Associates	3927 Elm Ave	Long Beach	CA	90807	\$	15,000.00	Fundraising Services
7/30/12	Cater America					\$	60,000.00	Catering
7/30/12	NMB Research	214 N. Fayette St	Alexandria	VA	22314	\$	84,000.00	Survey research
8/1/12	ADP Payroll Fees	1 ADP Boulevard	Roseland	NJ	7068	\$	67.52	Payroll Fees
8/1/12	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria	VA	22314	\$	2,696.86	Health Insurance
8/1/12	Spectrum Marketing Company	95 Eddy Rd	Manchester	NH	3102	\$	116,806.50	Printing, Design & Postage
8/3/12	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria	VA	22314	\$	20,421.91	Media placement
8/3/12	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria	VA	22314	\$	598,016.00	Media placement
8/6/12	Patton Boggs, LLP	2550 M St NW	Washington	DC	20037	\$	146.25	Legal fees
8/6/12	The Troupe	PO Box 67	Windham	NH	3087	\$	1,820.00	Media production
8/7/12	The Business Bank	133 Maple Avenue East	Vienna	VA	22180	\$	20.00	Wire Fee
8/7/12	Applied Technology	4473 W. 132nd Street	Hawthorne	CA	90250	\$	250.00	Strategy Consulting
8/7/12	The Maids Home Services					\$	265.00	Event cleaning
8/7/12	TargetPoint Consulting	66 Canal Center Plaza	Alexandria	VA	22314	\$	3,000.00	Survey research
8/7/12	Digital Acumen, LLC	PO Box 537	New Hampton	NH	3256	\$	3,500.00	Digital consulting
8/7/12	Cornucopia Caterers	16015 Arminta St.	Van Nuys	CA	91406	\$	3,745.35	Catering
8/7/12	Gateway Ventures, Inc.	6682 W. Greenfield Ave	Milwaukee	WI	53214	\$	15,000.00	Strategy Consulting
8/7/12	NMB Research	214 N. Fayette St	Alexandria	VA	22314	\$	46,000.00	Survey research
8/8/12	Norway Hill Associates	30 Norway Hill	Hancock	NH	3449	\$	1,516.60	Strategy Consulting
8/8/12	Hynes Communications	PO Box 4097	Portsmouth	NH	3802	\$	7,500.00	Communications consulting
8/8/12	Norway Hill Associates	30 Norway Hill	Hancock	NH	3449	\$	12,500.00	Strategy Consulting
8/9/12	Direct Dial	66 Canal Center Plaza	Alexandria	VA	22314	\$	9,960.60	Telephone calls
8/9/12	The Black Rock Group	66 Canal Center Plaza	Alexandria	VA	22314	\$	13,250.00	Communications consulting
8/10/12	American Express	200 Vesey Street	New York	NY	10281	\$	3,106.48	Credit card expense
8/10/12	Vandenberg & Associates	3927 Elm Ave	Long Beach	CA	90807	\$	15,000.00	Fundraising Services
8/10/12	American Express	200 Vesey Street	New York	NY	10281	\$	33,186.11	Credit card expense
8/14/12	ADP Tax	1 ADP Boulevard	Roseland	NJ	7068	\$	2,041.91	Payroll Fees
8/14/12	ADP Tax	1 ADP Boulevard	Roseland	NJ	7068	\$	3,564.85	Payroll Fees
8/14/12	Clark Hill	601 Pennsylvania Ave	Washington	DC	20004	\$	12,179.44	Legal Fees
8/14/12	Global Policy Solutions	27319 Julietta Lane	Los Altos Hills	CA	94022	\$	20,000.00	Strategy Consulting
8/15/12	First Wave Concepts	4258 Mayfair Lane	Port Orange	FL	32129	\$	150.00	Digital consulting
8/15/12	Moore Information	921 SW Washington St, Suite 810	Portland	OR	97205	\$	2,400.00	Survey research
8/15/12	Cornucopia Caterers					\$	3,745.35	
8/15/12	Miller Public Affairs	PO Box 12732	Salem	OR	97309	\$	10,000.00	Communications consulting
8/15/12	IS360	2300 Clarendon Blvd, Suite #800	Arlington	VA	22201	\$	15,000.00	Data
8/15/12	Meridian Pacific	925 University Ave	Sacramento	CA	95825	\$	20,000.00	Strategy Consulting
8/15/12	The Ginsberg McLearn Group	1215 K Street	Sacramento	CA	95814	\$	20,000.00	Strategy Consulting
8/15/12	The Hales Group	20 Seabuff	Newport Bea	CA	92680	\$	30,000.00	Fundraising Services
8/15/12	Americans for United Govt.	9900 Main Street, Suite 303	Fairfax	VA	22031	\$	100,000.00	Contribution
8/20/12	City of Alexandria	301 King Street	Alexandria	VA	22314	\$	170.15	Fee
8/21/12	Stephen DeMaura	66 Canal Center Plaza	Alexandria	VA	22314	\$	32.48	Reimbursement
8/21/12	Check #1060					\$	20,000.00	
8/21/12	Capitol Consulting and Strategy	1301 I Street	Sacramento	CA	95814	\$	63,322.00	Strategy Consulting
8/22/12	ADP Payroll Fees	1 ADP Boulevard	Roseland	NJ	7068	\$	67.52	Payroll Fees
8/22/12	Direct Dial	66 Canal Center Plaza	Alexandria	VA	22314	\$	5,223.70	Telephone calls
8/22/12	Capitol Consulting and Strategy	1301 I Street	Sacramento	CA	95814	\$	12,641.50	Strategy Consulting
8/22/12	NMB Research	214 N. Fayette St	Alexandria	VA	22314	\$	24,000.00	Survey research
8/23/12	Verizon Wireless	PO Box 408	Newark	NJ	7101	\$	195.17	Telephone service
8/23/12	The Ginsberg McLearn Group					\$	20,000.00	Strategy Consulting
8/23/12	ID Media Partners	1717 I Street	Sacramento	CA	95811	\$	110,000.00	Digital media placement
8/24/12	American Action Network	555 13th Street, NW, Suite 501 W	Washington	DC	20004	\$	25,000.00	Contribution
8/27/12	The Business Bank	133 Maple Avenue East	Vienna	VA	22180	\$	20.00	Wire Fee
8/27/12	Podium Capital Group	1400 Wewatta St	Denver	CO	80202	\$	254,000.00	Fundraising Services
8/28/12	Stephen DeMaura	66 Canal Center Plaza	Alexandria	VA	22314	\$	226.97	Reimbursement
8/28/12	Clark Hill	601 Pennsylvania Ave	Washington	DC	20004	\$	15,006.00	Legal Fees
8/30/12	ADP Tax	1 ADP Boulevard	Roseland	NJ	7068	\$	2,041.93	Payroll Fees
8/30/12	ADP Tax	1 ADP Boulevard	Roseland	NJ	7068	\$	3,564.84	Payroll Fees
8/31/12	Memento Strategies	6319 Buffalo Court	Burke	VA	22015	\$	9,750.00	
8/31/12	Michael Byrd	400 Treat Avenue	San Francisco	CA	94110	\$	30,000.00	Fundraising Services
9/4/12	Internal Revenue Service	PO Box 409101	Ogden	UT	84409	\$	450.00	Fees
9/4/12	Apex Strategies	13011 I Street	Sacramento	CA	95814	\$	1,456.68	Strategy Consulting

9/4/12	Clevo Media	1625 Eye Street NW	Washington DC	20006	\$	16,600.00	Media Production
9/4/12	Coalition for Jobs and Opportunity	PO Box 1715	Helena MT	58624	\$	20,000.00	Contribution
9/5/12	Norway Hill Associates	30 Norway Hill	Hancock NH	3449	\$	12,500.00	Strategy Consulting
9/5/12	Capitol Consulting and Strategy	1301 I Street	Sacramento CA	95814	\$	12,641.50	Strategy Consulting
9/5/12	Vandenberg & Associates	3927 Elm Ave	Long Beach CA	90807	\$	15,000.00	Fundraising Services
9/6/12	DC Treasurer	1101 4th Street SW, Suite 850W	Washington DC	20024	\$	50.00	Fee
9/6/12	ADP Payroll Fees	1 ADP Boulevard	Roseland NJ	7068	\$	67.52	Payroll Fees
9/6/12	Clark Hill	601 Pennsylvania Ave	Washington DC	20004	\$	15,006.00	Legal Fees
9/6/12	NMB Research	214 N. Fayette St	Alexandria VA	22314	\$	46,000.00	Survey research
9/10/12	The Business Bank	133 Maple Avenue East	Vienna VA	22180	\$	20.00	Wire Fee
9/10/12	Wildwood Crest				\$	45.00	
9/10/12	Patton Boggs, LLP	2550 M St NW	Washington DC	20037	\$	1,988.75	Legal fees
9/10/12	The Black Rock Group	66 Canal Center Plaza	Alexandria VA	22314	\$	13,250.00	Communications consulting
9/10/12	Center to Protect Patient Rights	20118 N. 67th Ave, Suite 300	AZ	85308	\$	4,050,000.00	Contribution
9/11/12	The Business Bank	133 Maple Avenue East	Vienna VA	22180	\$	20.00	Wire Fee
9/11/12	Strategic Media Placement	7669 Stagers Loop	Delaware OH	43015	\$	1,358,000.00	Media placement
9/13/12	American Express	200 Vesey Street	New York NY	10281	\$	41,814.92	Credit card expense
9/14/12	City of Alexandria	301 King Street	Alexandria VA	22314	\$	40.00	Fee
9/14/12	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$	2,041.92	Payroll Fees
9/14/12	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$	3,564.85	Payroll Fees
9/19/12	ADP Payroll Fees	1 ADP Boulevard	Roseland NJ	7068	\$	67.52	Payroll Fees
9/21/12	The Ginsberg McLearn Group	1215 K Street	Sacramento CA	95814	\$	202.80	Strategy Consulting
9/21/12	Applied Technology	4473 W. 132nd Street	Hawthorne CA	90250	\$	1,175.00	Consulting
9/21/12	Global Policy Solutions	27319 Juliet Lane	Los Altos Hill CA	94022	\$	5,000.00	Strategy Consulting
9/21/12	i360	2300 Clarendon Blvd, Suite #800	Arlington VA	22201	\$	5,000.00	Data
9/21/12	Capitol Consulting and Strategy	1301 I Street	Sacramento CA	95814	\$	6,022.19	Strategy Consulting
9/21/12	Meridian Pacific	925 University Ave	Sacramento CA	95825	\$	10,000.00	Strategy Consulting
9/21/12	Miller Public Affairs	PO Box 12732	Salem OR	97309	\$	10,000.00	Communications consulting
9/21/12	The Ginsberg McLearn Group	1215 K Street	Sacramento CA	95814	\$	10,000.00	Strategy Consulting
9/21/12	Grassroots Lab	235 E. Broadway St.	Long Beach CA	90802	\$	12,500.00	Grassroots Consulting
9/21/12	The Hales Group	20 Seabuff	Newport Bea CA	92680	\$	15,000.00	Fundraising Services
9/21/12	Vandenberg & Associates	3927 Elm Ave	Long Beach CA	90807	\$	15,000.00	Fundraising Services
9/21/12	American Tradition Partnership	PO Box 11894	Bozeman MT	59047	\$	16,750.00	Contribution
9/24/12	Wilson Perkins Allen	1319 Clusen Drive	Oklahoma City OK	73103	\$	22,915.00	Survey research
9/24/12	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria VA	22314	\$	8,165,368.30	Media placement
9/25/12	Harvard Business Review	PO Box 52180	Tampa FL	33663	\$	89.00	Subscription
9/25/12	First Wave Concepts	4258 Mayfair Lane	Port Orange FL	32129	\$	2,400.00	Digital consulting
9/26/12	Federal Express	PO Box 1140	Memphis TN	38101	\$	16.32	Shipping & Delivery
9/26/12	DC Treasurer	1101 4th Street SW, Suite 850W	Washington DC	20024	\$	80.00	Corporate Filing Fee
9/26/12	DC Treasurer	1101 4th Street SW, Suite 850W	Washington DC	20024	\$	130.00	Corporate Filing Fee
9/26/12	Verizon Wireless	PO Box 408	Newark NJ	7101	\$	175.80	Telephone service
9/26/12	Corporate Services Corporation	PO Box 13397	Philadelphia PA	19101	\$	598.00	
9/26/12	Norway Hill Associates	30 Norway Hill	Hancock NH	3449	\$	1,327.22	Strategy Consulting
9/26/12	Norway Hill Associates	30 Norway Hill	Hancock NH	3449	\$	12,500.00	Strategy Consulting
9/26/12	American Tradition Partnership	PO Box 11894	Bozeman MT	59047	\$	16,750.00	Contribution
9/26/12	ID Media Partners	1717 I Street	Sacramento CA	95811	\$	120,000.00	Digital media placement
9/27/12	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria VA	22314	\$	2,696.96	Health Insurance
9/27/12	i360	2300 Clarendon Blvd, Suite #800	Arlington VA	22201	\$	5,000.00	Data
9/28/12	Forbes	499 Washington Blvd	Jersey City NJ	7310	\$	61.95	Subscription
9/28/12	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$	2,041.92	Payroll Fees
9/28/12	Norway Hill Associates	30 Norway Hill	Hancock NH	3449	\$	3,322.90	Strategy Consulting
9/28/12	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$	3,564.85	Payroll Fees
9/28/12	Wilson Perkins Allen	1319 Clusen Drive	Oklahoma City OK	73103	\$	22,915.00	Survey research
10/1/12	Capitol Consulting and Strategy	1301 I Street	Sacramento CA	95814	\$	6,022.19	Strategy Consulting
10/1/12	Michael Byrd	400 Treat Avenue	San Francisco CA	94110	\$	15,000.00	Fundraising Services
10/1/12	Grassroots Lab	235 E. Broadway St.	Long Beach CA	90802	\$	25,000.00	Grassroots Consulting
10/1/12	Google	1600 Amphitheatre Parkway	Mountain View CA	94043	\$	50,000.00	Date estimated. Expense likely duplicated via credit card payments.
10/1/12	McCarthy Hennings Media	1850 M St. NW, Suite 235	Washington DC	20036	\$	63,170.72	Media production
10/1/12	Google	1600 Amphitheatre Parkway	Mountain View CA	94043	\$	100,000.00	Date estimated. Expense likely duplicated via credit card payments.
10/1/12	Google	1600 Amphitheatre Parkway	Mountain View CA	94043	\$	150,000.00	Date estimated. Expense likely duplicated via credit card payments.
10/2/12	Texans for Fiscal Responsibility	PO Box 200248	Austin TX	78720	\$	15,000.00	Contribution
10/2/12	The Hales Group	20 Seabuff	Newport Bea CA	92680	\$	15,000.00	Fundraising Services
10/2/12	Clark Hill	601 Pennsylvania Ave	Washington DC	20004	\$	18,299.77	Legal Fees
10/2/12	NMB Research	214 N. Fayette St	Alexandria VA	22314	\$	30,000.00	Survey research
10/2/12	Podium Capital Group	1400 Wewatta St	Denver CO	80202	\$	167,000.00	Fundraising Services
10/3/12	ADP Payroll Fees	1 ADP Boulevard	Roseland NJ	7068	\$	67.52	Payroll Fees
10/4/12	The Ginsberg McLearn Group				\$	202.80	Strategy Consulting
10/4/12	The Ginsberg McLearn Group				\$	10,000.00	Strategy Consulting
10/4/12	The Black Rock Group	66 Canal Center Plaza	Alexandria VA	22314	\$	13,250.00	Communications consulting
10/5/12	American Express	200 Vesey Street	New York NY	10281	\$	1,230.20	Credit card expense
10/5/12	JET Financial Services	802 Sonoma Drive	Helena MT	59601	\$	18,000.00	Strategy Consulting
10/5/12	The Sterling Corporation	106 W. Allegan, Suite 200	Lansing MI	48933	\$	413,000.00	Media placement
10/8/12	i360	2300 Clarendon Blvd, Suite #800	Arlington VA	22201	\$	5,000.00	Data
10/8/12	Meridian Pacific	925 University Ave	Sacramento CA	95825	\$	10,000.00	Strategy Consulting
10/8/12	The Ginsberg McLearn Group	1215 K Street	Sacramento CA	95814	\$	10,000.00	Strategy Consulting
10/8/12	Miller Public Affairs	PO Box 12732	Salem OR	97309	\$	10,850.00	Communications consulting
10/8/12	Grassroots Lab	235 E. Broadway St.	Long Beach CA	90802	\$	12,500.00	Grassroots Consulting
10/8/12	The Hales Group	20 Seabuff	Newport Bea CA	92680	\$	15,000.00	Fundraising Services
10/8/12	Vandenberg & Associates	3927 Elm Ave	Long Beach CA	90807	\$	15,000.00	Fundraising Services
10/8/12	Capitol Consulting and Strategy	1301 I Street	Sacramento CA	95814	\$	50,000.00	Strategy Consulting
10/8/12	NMB Research	214 N. Fayette St	Alexandria VA	22314	\$	72,000.00	Survey research
10/8/12	Coalition for Jobs and Opportunity	PO Box 1715	Helena MT	58624	\$	100,000.00	Contribution
10/9/12	Patton Boggs, LLP	2550 M St NW	Washington DC	20037	\$	11,432.50	Legal fees
10/10/12	Nielsen Merksamer	2350 Kerner Boulevard	San Rafael CA	94901	\$	5,000.00	"Legal fees"
10/10/12	Clark Hill	601 Pennsylvania Ave	Washington DC	20004	\$	22,649.77	Legal Fees
10/11/12	The Business Bank	133 Maple Avenue East	Vienna VA	22180	\$	20.00	Wire Fee
10/11/12	Coalition for Jobs and Opportunity	PO Box 1715	Helena MT	58624	\$	150,000.00	Contribution
10/11/12	Center to Protect Patient Rights	20118 N. 67th Ave, Suite 300	AZ	85308	#####	#####	Contribution
10/12/12	The Business Bank	133 Maple Avenue East	Vienna VA	22180	\$	20.00	Wire Fee
10/12/12	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$	2,041.91	Payroll Fees
10/12/12	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$	3,564.85	Payroll Fees
10/12/12	i360	2300 Clarendon Blvd, Suite #800	Arlington VA	22201	\$	5,000.00	
10/12/12	Michael Byrd	400 Treat Avenue	San Francisco CA	94110	\$	15,000.00	Fundraising Services

10/12/12	Capitol Consulting and Strategy	1301 I Street	Sacramento CA	95814	\$ 38,002.52	Strategy Consulting
10/12/12	Capitol Consulting and Strategy	1301 I Street	Sacramento CA	95814	\$ 50,000.00	Strategy Consulting
10/12/12	American Tradition Partnership	PO Box 11894	Bozeman MT	59047	\$ 54,000.00	Contribution
10/12/12	American Tradition Partnership	PO Box 11894	Bozeman MT	59047	\$ 54,000.00	Contribution
10/12/12	Capitol Consulting and Strategy	1301 I Street	Sacramento CA	95814	\$ 945,205.10	Strategy Consulting
10/15/12	Arena Communications	1780 Sequoia Vista Circle	Salt Lake City UT	84104	\$ 2,275.00	Printing, Design & Postage
10/15/12	Arena Communications	1780 Sequoia Vista Circle	Salt Lake City UT	84104	\$ 4,546.00	Printing, Design & Postage
10/15/12	Grassroots Lab	235 E. Broadway St.	Long Beach CA	90802	\$ 12,500.00	Grassroots Consulting
10/15/12	Texas for Fiscal Responsibility	PO Box 200248	Austin TX	78720	\$ 15,000.00	Contribution
10/15/12	The Males Group	20 Seabluff	Newport Bea CA	92680	\$ 15,000.00	Fundraising Services
10/15/12	Coalition for Jobs and Opportunity	PO Box 1715	Helena MT	58624	\$ 100,000.00	Contribution
10/16/12	Capitol Consulting and Strategy	1301 I Street	Sacramento CA	95814	\$ 7,640.61	Strategy Consulting
10/16/12	ID Media Partners	1717 I Street	Sacramento CA	95811	\$ 10,408.00	Digital consulting
10/16/12	Gateway Ventures	6682 W. Greenfield Ave	Milwaukee WI	53214	\$ 15,000.00	Strategy Consulting
10/17/12	ADP Payroll Fees	1 ADP Boulevard	Roseland NJ	7068	\$ 78.02	Payroll Fees
10/17/12	First Wave Concepts	4258 Mayfair Lane	Port Orange FL	32129	\$ 275.00	Digital consulting
10/18/12	Capitol Consulting and Strategy	1301 I Street	Sacramento CA	95814	\$ 895.20	Strategy Consulting
10/18/12	Miller Public Affairs	PO Box 12732	Salem OR	97309	\$ 10,000.00	Communications consulting
10/18/12	The Ginsberg McLearn Group				\$ 10,000.00	Strategy Consulting
10/18/12	Capitol Consulting and Strategy	1301 I Street	Sacramento CA	95814	\$ 60,000.00	Strategy Consulting
10/18/12	Podium Capital Group	1400 Wewatta St	Denver CO	80202	\$ 105,600.00	Fundraising Services
10/19/12	Arena Communications	1780 Sequoia Vista Circle	Salt Lake City UT	84104	\$ 6,821.00	Printing, Design & Postage
10/19/12	Coalition for Jobs and Opportunity	PO Box 1715	Helena MT	58624	\$ 100,000.00	Contribution
10/19/12	Center to Protect Patient Rights	20118 N. 67th Ave, Suite 300	AZ	85308	\$ 6,500,000.00	Contribution
10/22/12	The Business Bank	133 Maple Avenue East	Vienna VA	22180	\$ 20.00	Wire Fee
10/22/12	The Business Bank	133 Maple Avenue East	Vienna VA	22180	\$ 20.00	Wire Fee
10/22/12	CrossTarget	66 Canal Center Plaza	Alexandria VA	22314	\$ 1,157.80	Survey research
10/23/12	The Business Bank	133 Maple Avenue East	Vienna VA	22180	\$ 20.00	Wire Fee
10/23/12	McCarthy Hennings Media	1850 M St. NW, Suite 235	Washington DC	20036	\$ 1,351.50	Media production
10/23/12	Wilson Perkins Allen	1319 Chausen Drive	Oklahoma City OK	73103	\$ 17,100.00	Survey research
10/23/12	Direct Response, LLC	2340 E. Beardsley Rd, #100	Phoenix AZ	85024	\$ 19,161.75	Printing, Design & Postage
10/24/12	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria VA	22314	\$ 3,555.86	
10/24/12	Texas for Fiscal Responsibility	PO Box 200248	Austin TX	78720	\$ 25,000.00	Contribution
10/24/12	Coalition for Jobs and Opportunity	PO Box 1715	Helena MT	58624	\$ 50,000.00	Contribution
10/25/12	CrossTarget	66 Canal Center Plaza	Alexandria VA	22314	\$ 1,157.80	Survey research
10/26/12	The Business Bank	133 Maple Avenue East	Vienna VA	22180	\$ 20.00	Wire Fee
10/26/12	Verizon Wireless	PO Box 408	Newark NJ	7101	\$ 175.99	Telephone service
10/26/12	ccAdvertising				\$ 4,000.00	Advertising
10/26/12	Stephen DeMaura	66 Canal Center Plaza	Alexandria VA	22314	\$ 4,655.17	Reimbursement
10/26/12	Patton Boggs, LLP	2550 M St NW	Washington DC	20037	\$ 9,071.90	Legal fees
10/26/12	Voters for Good Government				\$ 9,500.00	Contribution
10/26/12	Madison Action Fund	PO Box 82	Aledo TX	76008	\$ 52,000.00	Contribution
10/26/12	American Express	200 Vesey Street	New York NY	10281	\$ 150,000.00	Credit card expense
10/26/12	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria VA	22314	\$ 1,124,482.20	Media placement
10/29/12	Johnson Strategies				\$ 32,000.00	Strategy Consulting. Estimated Date
10/30/12	Island Hotel	690 Newport Center Drive	Newport Bea CA	92660	\$ 1,414.00	Rental/Catering
10/30/12	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$ 2,041.92	Payroll Fees
10/30/12	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$ 3,564.85	Payroll Fees
10/30/12	Vandenberg & Associates	3927 Elm Ave	Long Beach CA	90807	\$ 15,000.00	Fundraising Services
10/30/12	Clark Hill	601 Pennsylvania Ave	Washington DC	20004	\$ 21,310.38	Legal Fees
10/30/12	Coalition for Jobs and Opportunity	PO Box 1715	Helena MT	58624	\$ 22,000.00	Contribution
10/30/12	Spectrum Marketing Company	95 Eddy Rd	Manchester NH	3102	\$ 54,675.04	Printing, Design & Postage
10/30/12	Targeted Victory	2311 Wilson Blvd	Arlington VA	22201	\$ 500,000.00	Media placement
10/30/12	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria VA	22314	\$ 1,089,879.40	Media placement
10/31/12	ADP Payroll Fees	1 ADP Boulevard	Roseland NJ	7068	\$ 67.52	Payroll Fees
10/31/12	McCarthy Hennings Media	1850 M St. NW, Suite 235	Washington DC	20036	\$ 1,976.90	Media production
10/31/12	Targeted Victory	2311 Wilson Blvd	Arlington VA	22201	\$ 90,000.00	Media placement
10/31/12	Targeted Victory	2311 Wilson Blvd	Arlington VA	22201	\$ 200,000.00	Media placement
11/1/12	The Business Bank	133 Maple Avenue East	Vienna VA	22180	\$ 20.00	Wire Fee
11/1/12	Targeted Victory	1033 North Fairfax Street	Alexandria VA	22314	\$ 500,000.00	Media placement
11/2/12	Capitol Consulting and Strategy	1301 I Street	Sacramento CA	95814	\$ 895.20	Strategy Consulting
11/2/12	Elavon Merchant Services				\$ 3,429.63	Credit card processing fee
11/2/12	Capitol Consulting and Strategy	1301 I Street	Sacramento CA	95814	\$ 7,640.61	Strategy Consulting
11/2/12	Capitol Consulting and Strategy	1301 I Street	Sacramento CA	95814	\$ 60,000.00	Strategy Consulting
11/2/12	Targeted Victory	1033 North Fairfax Street	Alexandria VA	22314	\$ 200,000.00	Media placement
11/2/12	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria VA	22314	\$ 484,536.08	Media placement
11/2/12	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria VA	22314	\$ 1,938,148.97	Media placement
11/5/12	American Express	200 Vesey Street	New York NY	10281	\$ 62,416.20	Credit card expense
11/6/12	Stephen DeMaura	66 Canal Center Plaza	Alexandria VA	22314	\$ 114.78	Travel reimbursement
11/6/12	Norway Hill Associates	30 Norway Hill	Hancock NH	3449	\$ 12,500.00	Strategy Consulting
11/6/12	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria VA	22314	\$ 115,858.00	Media placement
11/7/12	The Black Rock Group	66 Canal Center Plaza	Alexandria VA	22314	\$ 13,250.00	
11/7/12	Targeted Victory	1033 North Fairfax Street	Alexandria VA	22314	\$ 90,000.00	Media placement
11/13/12	Federal Express	PO Box 1140	Memphis TN	38101	\$ 78.63	Shipping & Delivery
11/14/12	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$ 1,989.40	Payroll Fees
11/14/12	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$ 3,586.06	Payroll Fees
11/14/12	Cicero Media	1625 Eye Street NW	Washington DC	20006	\$ 12,000.00	Media Production
11/15/12	McCarthy Marcus Hennings	1850 M St. NW, Suite 235	Washington DC	20036	\$ 1,976.90	Media production
11/16/12	Clark Hill	601 Pennsylvania Ave	Washington DC	20004	\$ 12,059.77	Legal Fees
11/20/12	State Corporation Commission	1300 E. Main St.	Richmond VA	23219	\$ 20.00	Fee
11/20/12	Podium Capital Group	1400 Wewatta St	Denver CO	80202	\$ 232,000.00	Fundraising Services
11/21/12	ADP Payroll Fees	1 ADP Boulevard	Roseland NJ	7068	\$ 67.52	Payroll Fees
11/28/12	ADP Payroll Fees	1 ADP Boulevard	Roseland NJ	7068	\$ 68.89	Payroll Fees
11/29/12	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$ 167,347.97	Payroll Fees
11/29/12	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$ 226,027.06	Payroll Fees
12/3/12	Elavon Merchant Services				\$ 52.00	Credit card processing fee
12/3/12	Coalition for Jobs and Opportunity	PO Box 1715	Helena MT	58624	\$ 22,000.00	Contribution
12/4/12	Norway Hill Associates	30 Norway Hill	Hancock NH	3449	\$ 12,500.00	Strategy Consulting
12/7/12	McCarthy Hennings Media	1850 M St. NW, Suite 235	Washington DC	20036	\$ 3,492.00	Media production
12/10/12	American Express	200 Vesey Street	New York NY	10281	\$ 65,092.63	Credit card expense
12/11/12	Federal Express	PO Box 1140	Memphis TN	38101	\$ 16.84	Shipping & Delivery
12/11/12	Verizon Wireless	PO Box 408	Newark NJ	7101	\$ 182.54	Telephone service
12/11/12	Norway Hill Associates	30 Norway Hill	Hancock NH	3449	\$ 2,566.46	Strategy Consulting

12/12/12	American Courier	815 N. Royal St, #210	Alexandria VA	22314	\$	26.00	Courier Service
12/12/12	Arguedas, Cassman & Headley	803 Hearst Avenue	Berkeley CA	94710	\$	4,776.00	Legal Fees
12/12/12	Patton Boggs, LLP	2550 M St NW	Washington DC	20037	\$	4,958.75	Legal fees
12/12/12	Tronconi, Segarra & Hore	8321 Main Street	Williamsville NY	14221	\$	6,475.00	
12/13/12	Wired	PO Box 37705	Boone IA	50037	\$	20.00	Subscription
12/13/12	Chubb Group of Insurance Companies	PO Box 7247	Philadelphia PA	19170	\$	1,875.00	Insurance
12/13/12	McCarthy Marcus Hennings	1850 M Street	Washington DC	20036	\$	3,492.00	Media production
12/13/12	The Black Rock Group	66 Canal Center Plaza	Alexandria VA	22314	\$	13,250.00	Communications consulting
12/14/12	The Business Bank	133 Maple Avenue East	Vienna VA	22180	\$	20.00	Wire Fee
12/14/12	Intuit	2700 Coast Ave	Mountain View CA	94043	\$	165.87	Subscription
12/14/12	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$	1,500.27	Payroll Fees
12/14/12	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$	3,783.59	Payroll Fees
12/17/12	First Wave Concepts	4258 Mayfair Lane	Port Orange FL	32129	\$	1,300.00	Digital consulting
12/19/12	ADP Payroll Fees	1 ADP Boulevard	Roseland NJ	7068	\$	67.52	Payroll Fees
12/24/12	Crossroads Media, LLC	66 Canal Center Plaza	Alexandria VA	22314	\$	3,292.86	Media placement
12/26/12	Memento Strategies	6319 Buffle Court	Burke VA	22015	\$	6,000.00	
12/26/12	Norway Hill Associates	30 Norway Hill	Hancock NH	3449	\$	12,500.00	Strategy Consulting
12/27/12	Federal Express	PO Box 1140	Memphis TN	38101	\$	29.92	Shipping & Delivery
12/27/12	Müller Public Affairs	1415 L Street	Sacramento CA	95814	\$	10,425.00	Communications consulting
12/28/12	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$	1,500.25	Payroll Fees
12/28/12	The Hartford	PO Box 2907	Hartford CT	6104	\$	1,671.00	Insurance
12/28/12	ADP Tax	1 ADP Boulevard	Roseland NJ	7068	\$	3,783.60	Payroll Fees
12/31/12	Global Policy Solutions	27319 Julieta Lane	Los Altos Hills CA	94022	\$	10,000.00	Strategy Consulting
12/31/12	Grassroots Lab	235 E. Broadway St.	Long Beach CA	90802	\$	12,500.00	Grassroots Consulting

**BEFORE THE FEDERAL ELECTION COMMISSION**

In the Matter of )  
)  
)

MUR 6538R  
- Americans for Job Security

I, Stephen DeMaura, being first duly sworn, depose and state the following facts, which are true and correct:

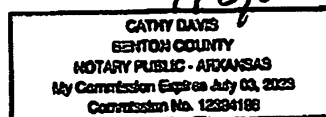
1. In accordance with the conciliation agreement in the above-referenced matter, the attached submission outlines the receipts and disbursements for Americans for Job Security ("AJS"), including the identity of any person or organization that gave money to AJS, for the time period of 2010 through 2012.
2. I used my best efforts to prepare this submission so as to provide as accurate a picture of AJS's finances as possible during the time period in question. I utilized bank records, spreadsheets, and other records. It is likely there are numerous duplicate receipts and expenditures within the documents.

Further the affiant sayeth not.

Stephen DeMaura  
Stephen DeMaura


Subscribed and sworn to before me, on this 23 day  
of 10, 2019.

Cathy Davis  
Notary Public 7/3/2023



**Via E-Mail**

Federal Election Commission  
**ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS**  
The FEC added this page to the end of this filing to indicate how it was received.

<input type="checkbox"/> Hand Delivered	Date of Receipt
<input type="checkbox"/> USPS First Class Mail	Postmarked Date of Receipt
<input type="checkbox"/> USPS Registered/Certified	Postmarked (R/C)
<input type="checkbox"/> USPS Priority Mail	Postmarked
<input type="checkbox"/> USPS Priority Mail Express	Postmarked
<input type="checkbox"/> Postmark Illegible	
<input type="checkbox"/> No Postmark	
<input type="checkbox"/> Overnight Delivery Service (Specify):	Shipping Date
	Next Business Day Delivery <input type="checkbox"/>
<input type="checkbox"/> Received from House Records & Registration Office	Date of Receipt
<input type="checkbox"/> Received from Senate Public Records Office	Date of Receipt
<input type="checkbox"/> Received from Electronic Filing Office	Date of Receipt
<input checked="" type="checkbox"/> Other (Specify): <u>Email</u>	Date of Receipt or Postmarked <u>10-24-19</u>
<div style="text-align: center;"> <b>PREPARER</b></div>	<u>10-24-19</u> <b>DATE PREPARED</b>

(3/2015)

# **EXHIBIT 4**

# National Group Files Complaint Against Dark Money Michigan Nonprofit

Complaint Alleges That Michigan Citizens For Fiscal Responsibility Made False Statements To IRS About Its Political Spending

By CRAIG MAUGER

*Michigan Campaign Finance Network*

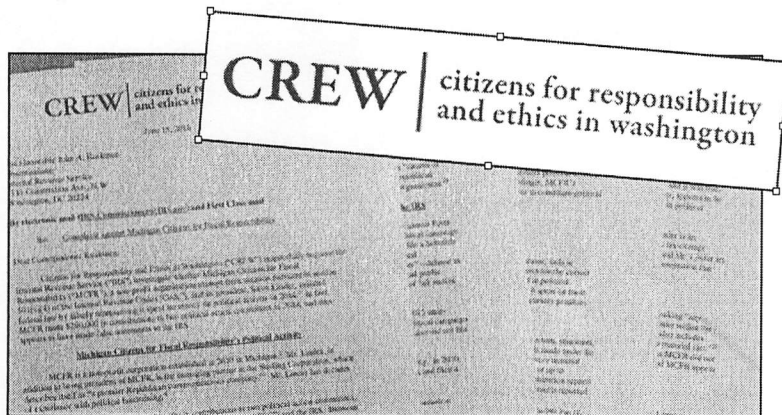
In a new complaint, a national ethics group says a shadowy Michigan nonprofit appears to have made false statements to the Internal Revenue Service (IRS) about its political spending.

Citizens for Responsibility and Ethics in Washington (CREW) filed a complaint today

(<http://www.citizensforethics.org/press/entry/crew-files-criminal-irs-complaints-against-10-dark-money-groups>) with the IRS that says the nonprofit Michigan Citizens for Fiscal Responsibility (MCFR) made \$290,000 in contributions to two political action committees in 2014. However, in tax filings for 2014, **Steve Linder**, a GOP consultant and the president of MCFR, told the IRS the group hadn't engaged in any "direct or indirect political campaign activities on behalf of or in opposition to candidates for public office."

"The IRS should investigate MCFR and Mr. Linder and should it find they made false or incomplete statements on MCFR's tax return, take appropriate action," the CREW complaint says.

In addition to the IRS complaint, CREW also requested that U.S. Department of Justice and the Federal Bureau of Investigation look into whether MCFR and five other nonprofits located outside of Michigan broke the law by falsely representing their 2014 political spending.



As CREW notes, 501(c)(4) social welfare groups, like MCFR, are allowed to make political expenditures as long as political activity is not their primary focus and as long as they disclose political spending to the IRS.

"These groups have demonstrated a clear disregard for the law," CREW Executive Director **Noah Bookbinder** said in a press release. "If the government does not act, it will send a signal to dark money groups that no laws or limits apply to them and it is open season for secret money in

our elections."

MCFR incorporated in Michigan in 2010. According to a 2014 filing with the state, its directors are Linder, who's a partner in the Lansing-based Sterling Corp., **Bob LaBrant**, senior counsel for the Sterling Corp., and **Denise DeCook**, whom the Sterling Corp. hired in 2014. The filing says the nonprofit's mission is to "inform and educate the public on fiscal policy issues."

The Sterling Corp. has done extensive consulting work for Michigan Senate Republicans and other lawmakers over the years, according to campaign finance records.

CREW says in 2014, MCFR gave \$155,000 to a federal Super PAC named Hardworking Americans Committee, which is connected to another Michigan-based GOP consultant, **Stu Sandler**, and \$135,000 to the Republican State Leadership Committee, which has a mission of electing state-level Republican officeholders.

MCFR reported raising \$1.39 million in 2014 but because it's a nonprofit organization, it doesn't have to disclose its donors.

In addition to his role with MCFR and Sterling, Linder is also president of the nonprofit Michigan Jobs and Labor Foundation, another group that doesn't have to disclose its donors. Like MCFR, the Michigan Jobs and Labor Foundation told the IRS that for 2014, it didn't engage in direct or indirect political campaign activities on behalf of candidates or in opposition to them.

	Yes	No
1 Is the organization described in section 501(c)(3) or 4947(a)(1) (other than a private foundation)? If "Yes," complete Schedule A . . . . .	1	No
2 Is the organization required to complete Schedule B, Schedule of Contributors (see instructions)? . . . . .	2 Yes	
3 Did the organization engage in direct or indirect political campaign activities on behalf of or in opposition to candidates for public office? If "Yes," complete Schedule C, Part I . . . . .	3	No
4 Section 501(c)(3) organizations. Did the organization engage in lobbying activities, or have a section 501(h)		

That's despite the fact that after getting in trouble with the Michigan Secretary of State, the Michigan Jobs and Labor Foundation reported giving

\$17,696 to a Michigan Super PAC for 2014. According to campaign finance records, that money was used on ads supporting GOP Senate candidates Ken Horn (R-Frankenmuth) and Dale Zorn (R-Ida). Read about that situation here (<https://mcfn.org/press.php?prId=254>).

The Michigan Jobs and Labor Foundation agreed to pay a \$17,696 fine from the Michigan Secretary of State's Office earlier this year.

You can read CREW's full complaints and report here (<http://www.citizensforethics.org/press/entry/crew-files-criminal-irs-complaints-against-10-dark-money-groups>).

As **Jordan Libowitz**, of CREW, explained, because of taxpayer confidentiality requirements, it's uncertain whether the public will ever know what the IRS does in response to the complaint.

Linder didn't immediately respond to a request for a response to the CREW complaint.

#### Related documents and articles

**FILE** ► Citizens for Responsibility And Ethics Complaint Against Michigan Citizens for Fiscal Responsibility  
(/node/5812/citizens-for-responsibility-and-ethics-complaint-against-michigan-citizens-for-fiscal-responsibility)

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ORGID2=383567634&vlrStratCode=8%2bV2ivQcg934ZIZZo36TzFSwE%2fRwSPyMPg%2bZUTXjY8AjALDWB04Lpgwbc13HoMai)

**Organization:** Michigan Citizens for Fiscal Responsibility (MCFR)

**Year founded:** 2010

**State of formation:** Michigan

**Fiscal year:** January 1 to December 31

**Summary of CREW complaint:** MCFR made \$290,000 in contributions to two political action committees in 2014, but told the IRS that it spent no money on political activity that year. By failing to report its contributions to the political action committees, it appears MCFR and its president Steve Linder made false representations to the IRS.

**Elections involved:** 2014 state-level races in Michigan. Between July 8 and November 1, 2014, the Hardworking Americans Committee, a super PAC, reported to the FEC receiving three contributions from MCFR totaling \$155,000. During the 2014 election, the Hardworking Americans Committee spent hundreds of thousands of dollars on independent expenditures in dozens of Michigan state Senate and House races. In October 2014, the Republican State Leadership Committee, a section 527 political organization, reported to the IRS receiving two contributions totaling \$135,000 from MCFR. The RSLC describes itself as “the only national organization whose mission is to elect down-ballot, state-level Republican officeholders.”

**Players:**

- Steve Linder is the president of MCFR. Mr. Linder also is the president and managing partner of The Sterling Corporation, which bills itself as “a premier Republican communications company.”
- Robert Labrant is the secretary of MCFR. Mr. Labrant also is senior counsel at The Sterling Corporation.
- Denise DeCook is the treasurer of MCFR. Ms. DeCook is a senior director at The Sterling Corporation.

**Known donors:** MCFR does not reveal its donors, but tax returns for other non-profit organizations reveal that the Michigan Jobs and Labor Foundation (MJLF) contributed \$700,000 to MCFR in 2014. Mr. Linder is also president of MJLF. In 2012, two non-profits with ties to another Michigan political operative, Stu Sandler, contributed to MCFR. Involve America contributed \$986,000 and Americans Who Advocate Responsible Efforts contributed \$25,000. Americans Who Advocate Responsible Efforts also contributed \$50,000 to MCFR in 2011 while another non-profit, Michigan Taxpayer Alert, contributed \$147,000 in 2010.

**Additional information of interest:** MCFR wasn't the only organization with ties to the Sterling Corporation that contributed money to the Hardworking Americans Committee super PAC in 2014. MJLF, the non-profit that significantly funded MCFR, also contributed \$40,000 to the super PAC. Three other organizations that share an address with the Sterling Corporation – the Senate Majority 2014 PAC, the West Michigan Preservation Fund, and the Moving Michigan Forward Fund II – also contributed to the Hardworking Americans Committee. The RSLC, which received money in 2014 from MCFR, MJLF and the Senate Majority 2014 PAC, also

contributed \$415,000 to the Hardworking Americans Committee. Mr. Sandler, whose non-profits previously funded MCFR, founded the Hardworking Americans Committee and advised the super PAC on independent expenditures in 2014.

# CREW | citizens for responsibility and ethics in washington

June 15, 2016

The Honorable John A. Koskinen  
Commissioner  
Internal Revenue Service  
1111 Constitution Ave., N.W.  
Washington, DC 20224

By electronic mail ([IRS.Commissioner@IRS.gov](mailto:IRS.Commissioner@IRS.gov)) and First Class mail

Re: Complaint against Michigan Citizens for Fiscal Responsibility

Dear Commissioner Koskinen:

Citizens for Responsibility and Ethics in Washington ("CREW") respectfully requests the Internal Revenue Service ("IRS") investigate whether Michigan Citizens for Fiscal Responsibility ("MCFR"), a non-profit organization exempt from taxation pursuant to section 501(c)(4) of the Internal Revenue Code ("Code"), and its president, Steve Linder, violated federal law by falsely representing it spent no money on political activity in 2014.<sup>1</sup> In fact, MCFR made \$290,000 in contributions to two political action committees in 2014, and thus appears to have made false statements to the IRS.

## Michigan Citizens for Fiscal Responsibility's Political Activity

MCFR is a non-profit corporation established in 2010 in Michigan.<sup>2</sup> Mr. Linder, in addition to being president of MCFR, is the managing partner at the Sterling Corporation, which describes itself as "a premier Republican communications company."<sup>3</sup> Mr. Linder has decades of experience with political fundraising.<sup>4</sup>

During 2014, MCFR made \$290,000 in contributions to two political action committees, according to reports filed with the Federal Election Commission ("FEC") and the IRS. Between July 8 and November 1, 2014, the Hardworking Americans Committee reported to the FEC receiving three contributions from MCFR totaling \$155,000.<sup>5</sup> The Hardworking Americans

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<sup>1</sup> CREW submits this letter in lieu of Form 13909; a copy is being sent to the Dallas office.

<sup>2</sup> Michigan Citizens for Fiscal Responsibility 2014 Form 990, at 1 (excerpts attached as Exhibit A).

<sup>3</sup> Sterling Corporation website, homepage, available at <http://www.sterlingcorporation.com/>; LinkedIn page, Steve Linder, available at <https://www.linkedin.com/in/steve-linder-1734748>. Sterling employees staff numerous section 501(c)(4) groups and political organizations. See, e.g., Matt Corley and David Crockett, Dead End Disclosure in the Laboratories of Democracy, CREW, Dec. 19, 2014, available at <http://www.citizensforethics.org/blog/entry/dead-end-disclosure-in-the-laboratories-of-democracy>.

<sup>4</sup> Sterling Corporation website, "Who We Are" page, available at <http://www.sterlingcorporation.com/who-we-are/>.

<sup>5</sup> Hardworking Americans Committee, FEC Form 3X, 2014 October Quarterly Report, Oct. 15, 2014, available at <http://docquery.fec.gov/pdf/826/14978273826/14978273826.pdf>; Hardworking Americans Committee, FEC Form 3X, 2014 Post-Election Report, Dec. 4, 2014, available at <http://docquery.fec.gov/pdf/333/14952766333/14952766333.pdf>.

Committee is a federal independent expenditure-only political committee, commonly known as a super PAC.<sup>6</sup> Super PACs are organized and operated primarily for the purpose of making independent political expenditures, and thus are political organizations under section 527.<sup>7</sup>

In October 2014, the Republican State Leadership Committee (“RSLC”) reported to the IRS receiving two contributions totaling \$135,000 from MCFR.<sup>8</sup> The RSLC is a “caucus of Republican state leaders . . . whose mission is to elect down-ballot, state-level Republican officeholders,”<sup>9</sup> and has classified itself in IRS filings as a section 527 political organization.<sup>10</sup>

### **Michigan Citizens for Fiscal Responsibility’s Representations to the IRS**

As a section 501(c)(4) tax-exempt organization, MCFR is required to file annual Form 990 tax returns. Tax-exempt organizations engaged in any “direct or indirect political campaign activities on behalf of or in opposition to candidates for public office” also must file a Schedule C with their tax returns, which requires disclosure of the amount spent on “political expenditures.”<sup>11</sup> “Political expenditures” include all “political campaign activities” – defined as “[a]ll activities that support or oppose candidates for elective federal, state, or local public office.”<sup>12</sup> Reflecting this definition, Schedule C specifically requires disclosure of “all section 527 organizations to which the filing organization made payments.”<sup>13</sup>

MCFR’s 2014 Form 990 tax return, signed by Mr. Linder on March 21, 2015 under penalty of perjury, asserted the group did not engage in any “direct or indirect political campaign activities on behalf of or in opposition to candidates for public office.”<sup>14</sup> MCFR also did not file a Schedule C reporting the amount it spent on political expenditures.

MCFR and Mr. Linder are aware the requirements to report political activity. In 2010, for example, MCFR acknowledged engaging in political activity on its tax returns and filed a Schedule C disclosing the amount it spent.<sup>15</sup>

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<sup>6</sup> Hardworking Americans Committee, FEC Form 1, Statement of Organization, Sept. 27, 2012, *available at* <http://docquery.fec.gov/pdf/173/12030891173/12030891173.pdf>.

<sup>7</sup> 26 U.S.C. § 527(e)(1).

<sup>8</sup> Republican State Leadership Committee, Form 8872, Political Organization Report of Contributions and Expenditures, 2014 Post-Election Report, Dec. 4, 2014 (attached as Exhibit B).

<sup>9</sup> RSLC website, “About” page, *available at* [http://rslc.gop/about\\_rslc/](http://rslc.gop/about_rslc/).

<sup>10</sup> Republican State Leadership Committee, Form 8871, Political Organization Notice of Section 527 Status, Amended, Mar. 11, 2015 (attached as Exhibit C).

<sup>11</sup> Form 990, Part IV, Question 3; 2014 Instructions for Form 990, at 12; 2014 Instructions for Schedule C, at 1, 3.

<sup>12</sup> *Id.* at 1; 2014 Instructions for Form 990, at 64.

<sup>13</sup> Form 990, Schedule C, Part I-C, Line 5.

<sup>14</sup> Michigan Citizens for Fiscal Responsibility 2014 Form 990, Part IV, Line 3.

<sup>15</sup> Michigan Citizens for Fiscal Responsibility 2010 Form 990, Part IV, Line 3 and Schedule C (excerpts attached as Exhibit D). In 2012, MCFR also erroneously reported contributions to section 527 political organizations as grants on its Schedule I. Michigan Citizens for Fiscal Responsibility 2012 Form 990, Schedule I (excerpts attached as Exhibit E). Even if MCFR erroneously believed the 2014 contributions to Hardworking Americans Committee and the RSLC should have been disclosed as grants on Schedule I rather than political contributions on Schedule C, it asserted on its 2014 tax return it did not make more than \$5,000 of “grants or other assistance to any domestic

### **Political Activity Under Section 501(c)(4)**

Contributions to political organizations are direct or indirect participation or intervention in political campaigns. “Contributions to political campaign funds . . . clearly violate the prohibition on political campaign intervention” for section 501(c)(3) organizations,<sup>16</sup> and prohibited political intervention for section 501(c)(3) organizations constitutes political activity that must be disclosed for section 501(c)(4) groups like MCFR.<sup>17</sup> Accordingly, MCFR’s contributions to Hardworking Americans Committee and the RSLC appear to constitute political campaign activities.

### **Violations**

#### **26 U.S.C. § 6652**

Under the Code, a tax-exempt organization that, without reasonable cause, fails to include any of the information required on a Form 990 tax return or fails to provide the correct information, is liable for civil penalties.<sup>18</sup> By failing to report that it engaged in political campaign activities on its 2014 Form 990 and by failing to report the amount it spent on them, MCFR appears to have violated 26 U.S.C. § 6652 and should be subject to monetary penalties.

#### **26 U.S.C. § 7206**

Under the Code, any person who “[w]illfully makes and subscribes any return, statement, or other document, which contains or is verified by a written declaration that it is made under the penalties of perjury, and which he does not believe to be true and correct as to every material matter,” is guilty of a felony and subject to up to three years in prison and a fine of up to \$100,000.<sup>19</sup> The money spent on political campaign activities a tax-exempt organization reports to the IRS on its Schedule C is material for several reasons, including: (1) the amounts reported

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organization” and did not file a Schedule I. Michigan Citizens for Fiscal Responsibility 2014 Form 990, Part IV, Line 21. As a result, MCFR did not disclose that spending anywhere on its tax return. Raising further questions about the accuracy of its 2014 tax return, MCFR told the IRS it spent \$1,216,250 on “contributions” on “support to organizations with similar exempt purposes.” *Id.*, Part III, Line 4a and Part IX, Line 24c.

<sup>16</sup> IRS, Election Year Activities and the Prohibition on Political Campaign Intervention for Section 501(c)(3) Organizations, FS-2006-17, February 2006; *see also, e.g.*, IRS website, The Restriction of Political Campaign Intervention by Section 501(c)(3) Tax-Exempt Organizations, March 5, 2014, *available at* [http://www.irs.gov/Charities-&-Non-Profits/Charitable-Organizations/The-Restriction-of-Political-Campaign-Intervention-by-Section-501\(c\)\(3\)-Tax-Exempt-Organizations](http://www.irs.gov/Charities-&-Non-Profits/Charitable-Organizations/The-Restriction-of-Political-Campaign-Intervention-by-Section-501(c)(3)-Tax-Exempt-Organizations).

<sup>17</sup> *See, e.g., Notice of Proposed Rulemaking, Guidance for Tax-Exempt Social Welfare Organizations on Candidate-Related Political Activities*, 78 Fed. Reg. 71535, 71536 (proposed Nov. 29, 2013) (“the IRS generally applies the same facts and circumstances analysis under section 501(c)(4)” as it does under section 501(c)(3)); Rev. Rul. 81-95 (citing examples of political intervention prohibited under section 501(c)(3) in determining political activity for section 501(c)(4) organizations); Priv. Ltr. Rul. 9652026 (October 1, 1996) (“[A]ny activities constituting prohibited political intervention by a section 501(c)(3) organization are activities that must be less than the primary activities of a section 501(c)(4) organization.”).

<sup>18</sup> 26 U.S.C. §§ 6652(c)(1)(A)(ii), 6652(c)(4); *see also* 20124Instructions for Form 990, at 6.

<sup>19</sup> 26 U.S.C. § 7206(1).

can be used by the IRS to determine whether the organization is complying with its tax-exempt status; (2) the amount an organization expended on section 527 exempt activities in part determines exempt function taxes the organization must pay;<sup>20</sup> and (3) accurate public disclosure of the amount of political activity conducted by tax-exempt organizations is critical to the objective of transparency that underlies the reporting required on Form 990.<sup>21</sup>

MCFR's 2014 Form 990 was signed by Mr. Linder under a written declaration that it was made under penalty of perjury, and that Mr. Linder had examined the return and it was true, correct, and complete to the best of his knowledge.<sup>22</sup> The tax return, however, appears to be false and incorrect as to the material matters of the fact that MCFR engaged in political campaign activities in 2014 and the amount it spent on them.

MCFR and Mr. Linder's representations appear to be willful. Mr. Linder is an experienced fundraiser and political operative whose firm operates numerous tax-exempt organizations. MCFR's 2010 and 2012 tax returns also demonstrate MCFR and Mr. Linder are aware of the requirements to disclose political spending. As a result, the representation that MCFR spent nothing at all on political activity appears to be willfully false.

#### 18 U.S.C. § 1001

Federal law further prohibits anyone from "knowingly and willfully" making "any materially false, fictitious, or fraudulent statement or representation" in any matter within the jurisdiction of the executive, legislative, or judicial branch.<sup>23</sup> The prohibition also includes anyone who "falsifies, conceals, or covers up by any trick, scheme, or device a material fact."<sup>24</sup> Violations are punishable by up to five years in prison.<sup>25</sup> By falsely stating that MCFR did not engage in any political campaign activity on the 2014 Form 990, Mr. Linder and MCFR appear to have violated 18 U.S.C. § 1001.

#### Conclusion

It appears MCFR and Mr. Linder falsely represented that MCFR did not engage in any political activity in 2014 and omitted thousands of dollars in spending on political activity from MCFR's 2014 tax return. The IRS should investigate MCFR and Mr. Linder and, should it find they made false or incomplete statements on MCFR's tax return, take appropriate action.

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<sup>20</sup> 26 U.S.C. § 527(f)(1).

<sup>21</sup> IRS, Background Paper, Summary of Form 990 Redesign Process, August 19, 2008, at 1.

<sup>22</sup> Michigan Citizens for Fiscal Responsibility 2014 Form 990, Part II.

<sup>23</sup> 18 U.S.C. § 1001(a)(2).

<sup>24</sup> 18 U.S.C. § 1001(a)(1).

<sup>25</sup> *Id.*

Hon. John A. Koskinen  
June 15, 2016  
Page 5

Thank you for your prompt attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Noah Bookbinder', written in a cursive style.

Noah Bookbinder  
Executive Director  
Citizens for Responsibility and Ethics in Washington

Encls.

cc: IRS-EO Classification

# **EXHIBIT A**

Form **990**

Department of the Treasury  
Internal Revenue Service

# Return of Organization Exempt From Income Tax

Under section 501(c), 527, or 4947(a)(1) of the Internal Revenue Code (except private foundations)

Do not enter social security numbers on this form as it may be made public  
Information about Form 990 and its instructions is at [www.irs.gov/form990](http://www.irs.gov/form990)

OMB No 1545-0047

**2014**

Open to Public Inspection

## A For the 2014 calendar year, or tax year beginning 01-01-2014, and ending 12-31-2014

<b>B</b> Check if applicable: <input type="checkbox"/> Address change <input type="checkbox"/> Name change <input type="checkbox"/> Initial return <input type="checkbox"/> Final return/terminated <input type="checkbox"/> Amended return <input type="checkbox"/> Application pending	<b>C</b> Name of organization Michigan Citizens for Fiscal Responsibility		<b>D</b> Employer identification number 27-1993953	
	Doing business as		<b>E</b> Telephone number (517) 267-9012	
	Number and street (or P.O. box if mail is not delivered to street address) 106 W Allegan	Room/suite		
	City or town, state or province, country, and ZIP or foreign postal code Lansing, MI 48933			<b>G</b> Gross receipts \$ 1,397,997
	<b>F</b> Name and address of principal officer STEVE LINDER 106 W Allegan Lansing, MI 48933			
<b>I</b> Tax-exempt status <input type="checkbox"/> 501(c)(3) <input checked="" type="checkbox"/> 501(c)(4) (insert no) <input type="checkbox"/> 4947(a)(1) or <input type="checkbox"/> 527		<b>H(a)</b> Is this a group return for subordinates? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <b>H(b)</b> Are all subordinates included? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "No," attach a list (see instructions) <b>H(c)</b> Group exemption number		
<b>J</b> Website: N/A		<b>K</b> Form of organization <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Trust <input type="checkbox"/> Association <input type="checkbox"/> Other		
		<b>L</b> Year of formation 2010	<b>M</b> State of legal domicile MI	

## Part I Summary

Activities & Governance	<b>1</b> Briefly describe the organization's mission or most significant activities Inform and educate the public on fiscal policy issues		
	<b>2</b> Check this box <input type="checkbox"/> if the organization discontinued its operations or disposed of more than 25% of its net assets		
	<b>3</b> Number of voting members of the governing body (Part VI, line 1a)	3	3
	<b>4</b> Number of independent voting members of the governing body (Part VI, line 1b)	4	3
	<b>5</b> Total number of individuals employed in calendar year 2014 (Part V, line 2a)	5	0
Revenue	<b>6</b> Total number of volunteers (estimate if necessary)	6	0
	<b>7a</b> Total unrelated business revenue from Part VIII, column (C), line 12	7a	0
	<b>7b</b> Net unrelated business taxable income from Form 990-T, line 34	7b	
	<b>8</b> Contributions and grants (Part VIII, line 1h)	Prior Year	Current Year
	<b>9</b> Program service revenue (Part VIII, line 2g)		1,397,950
	<b>10</b> Investment income (Part VIII, column (A), lines 3, 4, and 7d)		0
	<b>11</b> Other revenue (Part VIII, column (A), lines 5, 6d, 8c, 9c, 10c, and 11e)		47
	<b>12</b> Total revenue—add lines 8 through 11 (must equal Part VIII, column (A), line 12)		0
	<b>13</b> Grants and similar amounts paid (Part IX, column (A), lines 1-3)		1,397,997
	Expenses	<b>14</b> Benefits paid to or for members (Part IX, column (A), line 4)	
<b>15</b> Salaries, other compensation, employee benefits (Part IX, column (A), lines 5-10)			0
<b>16a</b> Professional fundraising fees (Part IX, column (A), line 11e)			0
<b>b</b> Total fundraising expenses (Part IX, column (D), line 25) <sup>0</sup>			0
<b>17</b> Other expenses (Part IX, column (A), lines 11a-11d, 11f-24e)			0
<b>18</b> Total expenses Add lines 13-17 (must equal Part IX, column (A), line 25)			1,375,531
<b>19</b> Revenue less expenses Subtract line 18 from line 12			1,375,531
Net Assets or Fund Balances			22,466
	<b>20</b> Total assets (Part X, line 16)	Beginning of Current Year	End of Year
	<b>21</b> Total liabilities (Part X, line 26)	3	22,469
	<b>22</b> Net assets or fund balances Subtract line 21 from line 20	3	0
		3	22,469

## Part II Signature Block

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.

Sign Here	***** Signature of officer		2015-03-21 Date		
	STEVE LINDER PRESIDENT Type or print name and title				
Paid Preparer Use Only	Print/Type preparer's name CHRISTIE M KONIECZNY CPA	Preparer's signature CHRISTIE M KONIECZNY CPA	Date	Check <input checked="" type="checkbox"/> if self-employed	PTIN
	Firm's name <input checked="" type="checkbox"/> Christie M Konieczny CPA PLLC			Firm's EIN <input checked="" type="checkbox"/>	
	Firm's address <input checked="" type="checkbox"/> PO BOX 159 GRAND LEDGE, MI 48837			Phone no (517) 202-3738	

**Part III** **Statement of Program Service Accomplishments**Check if Schedule O contains a response or note to any line in this Part III ☐ ☒**1** Briefly describe the organization's mission  
Inform and educate public**2** Did the organization undertake any significant program services during the year which were not listed on the prior Form 990 or 990-EZ? ☐ Yes ☒ No  
If "Yes," describe these new services on Schedule O**3** Did the organization cease conducting, or make significant changes in how it conducts, any program services? ☐ Yes ☒ No  
If "Yes," describe these changes on Schedule O**4** Describe the organization's program service accomplishments for each of its three largest program services, as measured by expenses Section 501(c)(3) and 501(c)(4) organizations are required to report the amount of grants and allocations to others, the total expenses, and revenue, if any, for each program service reported**4a** (Code) (Expenses \$ 1,216,250 including grants of \$ ) (Revenue \$ )  
SUPPORT TO ORGANIZATIONS WITH SIMILAR EXEMPT PURPOSES**4b** (Code) (Expenses \$ 157,852 including grants of \$ ) (Revenue \$ )  
COMMUNICATION AND EDUCATION OF THE PUBLIC REGARDING FISCAL ISSUES**4c** (Code) (Expenses \$ ) (Revenue \$ )  
including grants of \$**4d** Other program services (Describe in Schedule O )  
(Expenses \$ ) (Revenue \$ )  
including grants of \$**4e** **Total program service expenses** 1,374,102

**Part IV Checklist of Required Schedules**

	Yes	No
<b>1</b> Is the organization described in section 501(c)(3) or 4947(a)(1) (other than a private foundation)? If "Yes," complete Schedule A . . . . .	<b>1</b>	No
<b>2</b> Is the organization required to complete Schedule B, Schedule of Contributors (see instructions)? <input checked="" type="checkbox"/> . . . . .	<b>2</b> Yes	
<b>3</b> Did the organization engage in direct or indirect political campaign activities on behalf of or in opposition to candidates for public office? If "Yes," complete Schedule C, Part I . . . . .	<b>3</b>	No
<b>4 Section 501(c)(3) organizations.</b> Did the organization engage in lobbying activities, or have a section 501(h) election in effect during the tax year? If "Yes," complete Schedule C, Part II . . . . .	<b>4</b>	No
<b>5</b> Is the organization a section 501(c)(4), 501(c)(5), or 501(c)(6) organization that receives membership dues, assessments, or similar amounts as defined in Revenue Procedure 98-19? If "Yes," complete Schedule C, Part III . . . . .	<b>5</b>	No
<b>6</b> Did the organization maintain any donor advised funds or any similar funds or accounts for which donors have the right to provide advice on the distribution or investment of amounts in such funds or accounts? If "Yes," complete Schedule D, Part I . . . . .	<b>6</b>	No
<b>7</b> Did the organization receive or hold a conservation easement, including easements to preserve open space, the environment, historic land areas, or historic structures? If "Yes," complete Schedule D, Part II . . . . .	<b>7</b>	No
<b>8</b> Did the organization maintain collections of works of art, historical treasures, or other similar assets? If "Yes," complete Schedule D, Part III . . . . .	<b>8</b>	No
<b>9</b> Did the organization report an amount in Part X, line 21 for escrow or custodial account liability, serve as a custodian for amounts not listed in Part X, or provide credit counseling, debt management, credit repair, or debt negotiation services? If "Yes," complete Schedule D, Part IV . . . . .	<b>9</b>	No
<b>10</b> Did the organization, directly or through a related organization, hold assets in temporarily restricted endowments, permanent endowments, or quasi-endowments? If "Yes," complete Schedule D, Part V . . . . .	<b>10</b>	No
<b>11</b> If the organization's answer to any of the following questions is "Yes," then complete Schedule D, Parts VI, VII, VIII, IX, or X as applicable		
<b>a</b> Did the organization report an amount for land, buildings, and equipment in Part X, line 10? If "Yes," complete Schedule D, Part VI . . . . .	<b>11a</b>	No
<b>b</b> Did the organization report an amount for investments—other securities in Part X, line 12 that is 5% or more of its total assets reported in Part X, line 16? If "Yes," complete Schedule D, Part VII . . . . .	<b>11b</b>	No
<b>c</b> Did the organization report an amount for investments—program related in Part X, line 13 that is 5% or more of its total assets reported in Part X, line 16? If "Yes," complete Schedule D, Part VIII . . . . .	<b>11c</b>	No
<b>d</b> Did the organization report an amount for other assets in Part X, line 15 that is 5% or more of its total assets reported in Part X, line 16? If "Yes," complete Schedule D, Part IX . . . . .	<b>11d</b>	No
<b>e</b> Did the organization report an amount for other liabilities in Part X, line 25? If "Yes," complete Schedule D, Part X . . . . .	<b>11e</b>	No
<b>f</b> Did the organization's separate or consolidated financial statements for the tax year include a footnote that addresses the organization's liability for uncertain tax positions under FIN 48 (ASC 740)? If "Yes," complete Schedule D, Part X . . . . .	<b>11f</b>	No
<b>12a</b> Did the organization obtain separate, independent audited financial statements for the tax year? If "Yes," complete Schedule D, Parts XI and XII . . . . .	<b>12a</b>	No
<b>b</b> Was the organization included in consolidated, independent audited financial statements for the tax year? If "Yes," and if the organization answered "No" to line 12a, then completing Schedule D, Parts XI and XII is optional . . . . .	<b>12b</b>	No
<b>13</b> Is the organization a school described in section 170(b)(1)(A)(ii)? If "Yes," complete Schedule E . . . . .	<b>13</b>	No
<b>14a</b> Did the organization maintain an office, employees, or agents outside of the United States? . . . . .	<b>14a</b>	No
<b>b</b> Did the organization have aggregate revenues or expenses of more than \$10,000 from grantmaking, fundraising, business, investment, and program service activities outside the United States, or aggregate foreign investments valued at \$100,000 or more? If "Yes," complete Schedule F, Parts I and IV . . . . .	<b>14b</b>	No
<b>15</b> Did the organization report on Part IX, column (A), line 3, more than \$5,000 of grants or other assistance to or for any foreign organization? If "Yes," complete Schedule F, Parts II and IV . . . . .	<b>15</b>	No
<b>16</b> Did the organization report on Part IX, column (A), line 3, more than \$5,000 of aggregate grants or other assistance to or for foreign individuals? If "Yes," complete Schedule F, Parts III and IV . . . . .	<b>16</b>	No
<b>17</b> Did the organization report a total of more than \$15,000 of expenses for professional fundraising services on Part IX, column (A), lines 6 and 11e? If "Yes," complete Schedule G, Part I (see instructions) . . . . .	<b>17</b>	No
<b>18</b> Did the organization report more than \$15,000 total of fundraising event gross income and contributions on Part VIII, lines 1c and 8a? If "Yes," complete Schedule G, Part II . . . . .	<b>18</b>	No
<b>19</b> Did the organization report more than \$15,000 of gross income from gaming activities on Part VIII, line 9a? If "Yes," complete Schedule G, Part III . . . . .	<b>19</b>	No
<b>20a</b> Did the organization operate one or more hospital facilities? If "Yes," complete Schedule H . . . . .	<b>20a</b>	No
<b>b</b> If "Yes" to line 20a, did the organization attach a copy of its audited financial statements to this return?	<b>20b</b>	

**Part IV Checklist of Required Schedules (continued)**

<b>21</b>	Did the organization report more than \$5,000 of grants or other assistance to any domestic organization or domestic government on Part IX, column (A), line 1? <i>If "Yes," complete Schedule I, Parts I and II . . .</i>	<b>21</b>		No
<b>22</b>	Did the organization report more than \$5,000 of grants or other assistance to or for domestic individuals on Part IX, column (A), line 2? <i>If "Yes," complete Schedule I, Parts I and III . . .</i>	<b>22</b>		No
<b>23</b>	Did the organization answer "Yes" to Part VII, Section A, line 3, 4, or 5 about compensation of the organization's current and former officers, directors, trustees, key employees, and highest compensated employees? <i>If "Yes," complete Schedule J . . .</i>	<b>23</b>		No
<b>24a</b>	Did the organization have a tax-exempt bond issue with an outstanding principal amount of more than \$100,000 as of the last day of the year, that was issued after December 31, 2002? <i>If "Yes," answer lines 24b through 24d and complete Schedule K. If "No," go to line 25a . . .</i>	<b>24a</b>		No
<b>b</b>	Did the organization invest any proceeds of tax-exempt bonds beyond a temporary period exception? . . .	<b>24b</b>		
<b>c</b>	Did the organization maintain an escrow account other than a refunding escrow at any time during the year to defease any tax-exempt bonds? . . .	<b>24c</b>		
<b>d</b>	Did the organization act as an "on behalf of" issuer for bonds outstanding at any time during the year? . . .	<b>24d</b>		
<b>25a</b>	<b>Section 501(c)(3), 501(c)(4), and 501(c)(29) organizations.</b> Did the organization engage in an excess benefit transaction with a disqualified person during the year? <i>If "Yes," complete Schedule L, Part I . . .</i>	<b>25a</b>		No
<b>b</b>	Is the organization aware that it engaged in an excess benefit transaction with a disqualified person in a prior year, and that the transaction has not been reported on any of the organization's prior Forms 990 or 990-EZ? <i>If "Yes," complete Schedule L, Part I . . .</i>	<b>25b</b>		No
<b>26</b>	Did the organization report any amount on Part X, line 5, 6, or 22 for receivables from or payables to any current or former officers, directors, trustees, key employees, highest compensated employees, or disqualified persons? <i>If "Yes," complete Schedule L, Part II . . .</i>	<b>26</b>		No
<b>27</b>	Did the organization provide a grant or other assistance to an officer, director, trustee, key employee, substantial contributor or employee thereof, a grant selection committee member, or to a 35% controlled entity or family member of any of these persons? <i>If "Yes," complete Schedule L, Part III . . .</i>	<b>27</b>		No
<b>28</b>	Was the organization a party to a business transaction with one of the following parties (see Schedule L, Part IV instructions for applicable filing thresholds, conditions, and exceptions)			
<b>a</b>	A current or former officer, director, trustee, or key employee? <i>If "Yes," complete Schedule L, Part IV . . .</i>	<b>28a</b>		No
<b>b</b>	A family member of a current or former officer, director, trustee, or key employee? <i>If "Yes," complete Schedule L, Part IV . . .</i>	<b>28b</b>		No
<b>c</b>	An entity of which a current or former officer, director, trustee, or key employee (or a family member thereof) was an officer, director, trustee, or direct or indirect owner? <i>If "Yes," complete Schedule L, Part IV . . .</i>	<b>28c</b>		No
<b>29</b>	Did the organization receive more than \$25,000 in non-cash contributions? <i>If "Yes," complete Schedule M . . .</i>	<b>29</b>		No
<b>30</b>	Did the organization receive contributions of art, historical treasures, or other similar assets, or qualified conservation contributions? <i>If "Yes," complete Schedule M . . .</i>	<b>30</b>		No
<b>31</b>	Did the organization liquidate, terminate, or dissolve and cease operations? <i>If "Yes," complete Schedule N, Part I . . .</i>	<b>31</b>		No
<b>32</b>	Did the organization sell, exchange, dispose of, or transfer more than 25% of its net assets? <i>If "Yes," complete Schedule N, Part II . . .</i>	<b>32</b>		No
<b>33</b>	Did the organization own 100% of an entity disregarded as separate from the organization under Regulations sections 301.7701-2 and 301.7701-3? <i>If "Yes," complete Schedule R, Part I . . .</i>	<b>33</b>		No
<b>34</b>	Was the organization related to any tax-exempt or taxable entity? <i>If "Yes," complete Schedule R, Part II, III, or IV, and Part V, line 1 . . .</i>	<b>34</b>		No
<b>35a</b>	Did the organization have a controlled entity within the meaning of section 512(b)(13)?	<b>35a</b>		No
<b>b</b>	If "Yes" to line 35a, did the organization receive any payment from or engage in any transaction with a controlled entity within the meaning of section 512(b)(13)? <i>If "Yes," complete Schedule R, Part V, line 2 . . .</i>	<b>35b</b>		No
<b>36</b>	<b>Section 501(c)(3) organizations.</b> Did the organization make any transfers to an exempt non-charitable related organization? <i>If "Yes," complete Schedule R, Part V, line 2 . . .</i>	<b>36</b>		
<b>37</b>	Did the organization conduct more than 5% of its activities through an entity that is not a related organization and that is treated as a partnership for federal income tax purposes? <i>If "Yes," complete Schedule R, Part VI . . .</i>	<b>37</b>		No
<b>38</b>	Did the organization complete Schedule O and provide explanations in Schedule O for Part VI, lines 11b and 19? <b>Note.</b> All Form 990 filers are required to complete Schedule O . . .	<b>38</b>	Yes	

**Part IX Statement of Functional Expenses**

Section 501(c)(3) and 501(c)(4) organizations must complete all columns. All other organizations must complete column (A).

Check if Schedule O contains a response or note to any line in this Part IX ☐**Do not include amounts reported on lines 6b, 7b, 8b, 9b, and 10b of Part VIII.**

	(A) Total expenses	(B) Program service expenses	(C) Management and general expenses	(D) Fundraising expenses
<b>1</b> Grants and other assistance to domestic organizations and domestic governments See Part IV, line 21 . . . . .				
<b>2</b> Grants and other assistance to domestic individuals See Part IV, line 22 . . . . .				
<b>3</b> Grants and other assistance to foreign organizations, foreign governments, and foreign individuals See Part IV, lines 15 and 16 . . . . .				
<b>4</b> Benefits paid to or for members . . . . .				
<b>5</b> Compensation of current officers, directors, trustees, and key employees . . . . .				
<b>6</b> Compensation not included above, to disqualified persons (as defined under section 4958(f)(1)) and persons described in section 4958(c)(3)(B) . . . . .				
<b>7</b> Other salaries and wages . . . . .				
<b>8</b> Pension plan accruals and contributions (include section 401(k) and 403(b) employer contributions) . . . . .				
<b>9</b> Other employee benefits . . . . .				
<b>10</b> Payroll taxes . . . . .				
<b>11</b> Fees for services (non-employees)				
<b>a</b> Management . . . . .				
<b>b</b> Legal . . . . .	620	0	620	0
<b>c</b> Accounting . . . . .	400	0	400	0
<b>d</b> Lobbying . . . . .				
<b>e</b> Professional fundraising services See Part IV, line 17				
<b>f</b> Investment management fees . . . . .				
<b>g</b> Other (If line 11g amount exceeds 10% of line 25, column (A) amount, list line 11g expenses on Schedule O) . . . . .				
<b>12</b> Advertising and promotion . . . . .	86,839	86,839	0	0
<b>13</b> Office expenses . . . . .				
<b>14</b> Information technology . . . . .				
<b>15</b> Royalties . . . . .				
<b>16</b> Occupancy . . . . .				
<b>17</b> Travel . . . . .	69	0	69	0
<b>18</b> Payments of travel or entertainment expenses for any federal, state, or local public officials . . . . .				
<b>19</b> Conferences, conventions, and meetings . . . . .	6,166	6,166	0	0
<b>20</b> Interest . . . . .				
<b>21</b> Payments to affiliates . . . . .				
<b>22</b> Depreciation, depletion, and amortization . . . . .				
<b>23</b> Insurance . . . . .				
<b>24</b> Other expenses Itemize expenses not covered above (List miscellaneous expenses in line 24e. If line 24e amount exceeds 10% of line 25, column (A) amount, list line 24e expenses on Schedule O)				
<b>a</b> Printing . . . . .	39,243	39,243	0	0
<b>b</b> Postage . . . . .	25,604	25,604	0	0
<b>c</b> Contributions . . . . .	1,216,250	1,216,250	0	0
<b>d</b> License & fees . . . . .	340	0	340	0
<b>e</b> All other expenses . . . . .				
<b>25</b> <b>Total functional expenses.</b> Add lines 1 through 24e	1,375,531	1,374,102	1,429	0
<b>26</b> <b>Joint costs.</b> Complete this line only if the organization reported in column (B) joint costs from a combined educational campaign and fundraising solicitation. Check here <input type="checkbox"/> if following SOP 98-2 (ASC 958-720)				

## **EXHIBIT B**

**Political Organization  
Report of Contributions and Expenditures**

OMB No. 1545-1696

► See separate instructions.

**A For the period beginning** 10/01/2014 **and ending** 11/24/2014

**B Check applicable box:** ☒ Initial report ☐ Change of address ☐ Amended report ☐ Final report

**1 Name of organization** Republican State Leadership Committee - RSLC **Employer identification number** 05 - 0532524

**2 Mailing address (P.O. box or number, street, and room or suite number)**  
1201 F Street NW SUITE 675

**City or town, state, and ZIP code**  
Washington, DC 20004

**3 E-mail address of organization:** rslc@rslc.com **4 Date organization was formed:** 09/25/2002

**5a Name of custodian of records** Staci A. Goede **5b Custodian's address** 1201 F Street NW SUITE 675  
Washington, DC 20004

**6a Name of contact person** Matthew C. Walter **6b Contact person's address** 1201 F Street NW SUITE 675  
Washington, DC 20004

**7 Business address of organization (if different from mailing address shown above). Number, street, and room or suite number**  
1201 F Street NW SUITE 675

**City or town, state, and ZIP code**  
Washington, DC 20004

**8 Type of report (check only one box)**

- ☐ First quarterly report (due by April 15)  
☐ Second quarterly report (due by July 15)  
☐ Third quarterly report (due by October 15)  
☐ Year-end report (due by January 31)  
☐ Mid-year report (Non-election year only-due by July 31)  
☐ Monthly report for the month of: (due by the 20th day following the month shown above, except the December report, which is due by January 31)  
☐ Pre-election report (due by the 12th or 15th day before the election)  
    (1) Type of election:  
    (2) Date of election:  
    (3) For the state of:  
☒ Post-general election report (due by the 30th day after general election)  
    (1) Date of election: 11/04/2014  
    (2) For the state of: DC

**9 Total amount of reported contributions (total from all attached Schedules A) ..... 9. \$ 6831747**

**10 Total amount of reported expenditures (total from all attached Schedules B) ..... 10. \$ 9906889**

Under penalties of perjury, I declare that I have examined this report, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete.

Matthew C Walter

12/04/2014

**Sign  
Here**

Signature of authorized official

Date

<b>Contributor's name, mailing address and ZIP code</b> WISCONSIN TRANSPORTATION BUILDERS ASSOCIATION 1 SOUTH PINCKNEY STREET SUITE MADISON, WI 53703	<b>Name of contributor's employer</b> N/A <b>Contributor's occupation</b> N/A <b>Aggregate contributions year-to-date</b> \$ 15000	<b>Amount of contribution</b> \$ 15000 <b>Date of contribution</b> 10/21/2014
<b>Contributor's name, mailing address and ZIP code</b> BARBARA CLIFFORD 9213 WH BURGESS DR EL PASO, TX 79925	<b>Name of contributor's employer</b> HOMEMAKER <b>Contributor's occupation</b> HOMEMAKER <b>Aggregate contributions year-to-date</b> \$ 583	<b>Amount of contribution</b> \$ 363 <b>Date of contribution</b> 10/10/2014
<b>Contributor's name, mailing address and ZIP code</b> WILLIAM SPEARY 35 SILKBAY PLACE SPRING, TX 77382	<b>Name of contributor's employer</b> RETIRED <b>Contributor's occupation</b> RETIRED <b>Aggregate contributions year-to-date</b> \$ 400	<b>Amount of contribution</b> \$ 200 <b>Date of contribution</b> 10/29/2014
<b>Contributor's name, mailing address and ZIP code</b> BETTY RALL 8032 101ST STREET SE FORBES, ND 58439	<b>Name of contributor's employer</b> N/A <b>Contributor's occupation</b> N/A <b>Aggregate contributions year-to-date</b> \$ 100	<b>Amount of contribution</b> \$ 50 <b>Date of contribution</b> 10/08/2014
<b>Contributor's name, mailing address and ZIP code</b> EXPRESS SCRIPTS, INC. 8931A SPRINGDALE AVE SAINT LOUIS, MO 63134	<b>Name of contributor's employer</b> N/A <b>Contributor's occupation</b> N/A <b>Aggregate contributions year-to-date</b> \$ 51084	<b>Amount of contribution</b> \$ 299 <b>Date of contribution</b> 10/06/2014
<b>Contributor's name, mailing address and ZIP code</b> MICHIGAN CITIZENS FOR FISCAL RESPONSIBILITY 106 W ALLEGAN STREET, STE 200 LANSING, MI 48933	<b>Name of contributor's employer</b> N/A <b>Contributor's occupation</b> N/A <b>Aggregate contributions year-to-date</b> \$ 135000	<b>Amount of contribution</b> \$ 60000 <b>Date of contribution</b> 10/17/2014
<b>Contributor's name, mailing address and ZIP code</b> JAYNE KRAYBILL 117 N POINTE DR GOLDSBORO, NC 27530	<b>Name of contributor's employer</b> N/A <b>Contributor's occupation</b> N/A <b>Aggregate contributions year-to-date</b> \$ 120	<b>Amount of contribution</b> \$ 70 <b>Date of contribution</b> 10/06/2014
<b>Contributor's name, mailing address and ZIP code</b> EUGENIA WHITE 2924 SAINT ANDREWS LANE CHARLOTTE, NC 28205	<b>Name of contributor's employer</b> N/A <b>Contributor's occupation</b> N/A <b>Aggregate contributions year-to-date</b> \$ 100	<b>Amount of contribution</b> \$ 100 <b>Date of contribution</b> 11/14/2014
<b>Contributor's name, mailing address and ZIP code</b> AMERICAN COALITION FOR CLEAN COAL ELECTRICITY 1152 15TH STREET NW, SUITE 400 WASHINGTON, DC 20005	<b>Name of contributor's employer</b> N/A <b>Contributor's occupation</b> N/A <b>Aggregate contributions year-to-date</b> \$ 22299	<b>Amount of contribution</b> \$ 12000 <b>Date of contribution</b> 11/03/2014
<b>Contributor's name, mailing address and ZIP code</b> WARD DEGROOT 3248 N. OHIO STREET ARLINGTON, VA 22207	<b>Name of contributor's employer</b> RETIRED <b>Contributor's occupation</b> RETIRED <b>Aggregate contributions year-to-date</b> \$ 200	<b>Amount of contribution</b> \$ 200 <b>Date of contribution</b> 10/21/2014
<b>Contributor's name, mailing address and ZIP code</b> ISLE OF CAPRI CASINOS, INC. 600 EMERSON ROAD SUITE 300 SAINT LOUIS, MO 63141	<b>Name of contributor's employer</b> N/A <b>Contributor's occupation</b> N/A <b>Aggregate contributions year-to-date</b> \$ 12000	<b>Amount of contribution</b> \$ 12000 <b>Date of contribution</b> 10/30/2014

<b>Contributor's name, mailing address and ZIP code</b> PAGE BELLINGER 2447 28TH STREET MOLINE, IL 61265	<b>Name of contributor's employer</b> RETIRED <b>Contributor's occupation</b> RETIRED <b>Aggregate contributions year-to-date</b> \$ 255	<b>Amount of contribution</b> \$ 75 <b>Date of contribution</b> 10/21/2014
<b>Contributor's name, mailing address and ZIP code</b> FEDERAL EXPRESS POLITICAL ACTION COMMITTEE 942 S SHADY GROVE ROAD MEMPHIS, TN 38120	<b>Name of contributor's employer</b> N/A <b>Contributor's occupation</b> N/A <b>Aggregate contributions year-to-date</b> \$ 27000	<b>Amount of contribution</b> \$ 5000 <b>Date of contribution</b> 10/23/2014
<b>Contributor's name, mailing address and ZIP code</b> ARLYN WADHOLM 8951 32ND STREET NW NEW TOWN, ND 58763	<b>Name of contributor's employer</b> RETIRED <b>Contributor's occupation</b> RETIRED <b>Aggregate contributions year-to-date</b> \$ 1193	<b>Amount of contribution</b> \$ 330 <b>Date of contribution</b> 10/10/2014
<b>Contributor's name, mailing address and ZIP code</b> RENEE COPELAND 6108 89TH STREET E. PUYALLUP, WA 98371	<b>Name of contributor's employer</b> RETIRED <b>Contributor's occupation</b> RETIRED <b>Aggregate contributions year-to-date</b> \$ 450	<b>Amount of contribution</b> \$ 200 <b>Date of contribution</b> 10/29/2014
<b>Contributor's name, mailing address and ZIP code</b> RUTH GORMLY 1220 RANCHO ROAD ARCADIA, CA 91006	<b>Name of contributor's employer</b> N/A <b>Contributor's occupation</b> N/A <b>Aggregate contributions year-to-date</b> \$ 150	<b>Amount of contribution</b> \$ 100 <b>Date of contribution</b> 10/14/2014
<b>Contributor's name, mailing address and ZIP code</b> H. NEILL LEHR 5842 CHURCHILL DOWNS RD OCEANSIDE, CA 92057	<b>Name of contributor's employer</b> RETIRED <b>Contributor's occupation</b> RETIRED <b>Aggregate contributions year-to-date</b> \$ 225	<b>Amount of contribution</b> \$ 225 <b>Date of contribution</b> 10/13/2014
<b>Contributor's name, mailing address and ZIP code</b> JEAN LENHART 1400 GEARY BLVD SAN FRANCISCO, CA 94109	<b>Name of contributor's employer</b> N/A <b>Contributor's occupation</b> N/A <b>Aggregate contributions year-to-date</b> \$ 120	<b>Amount of contribution</b> \$ 50 <b>Date of contribution</b> 10/31/2014
<b>Contributor's name, mailing address and ZIP code</b> JON STILLMAN 800 TOWNE CIR STILLWATER, MN 55082	<b>Name of contributor's employer</b> N/A <b>Contributor's occupation</b> N/A <b>Aggregate contributions year-to-date</b> \$ 100	<b>Amount of contribution</b> \$ 50 <b>Date of contribution</b> 10/07/2014
<b>Contributor's name, mailing address and ZIP code</b> MICHIGAN CITIZENS FOR FISCAL RESPONSIBILITY 106 W ALLEGAN STREET, STE 200 LANSING, MI 48933	<b>Name of contributor's employer</b> N/A <b>Contributor's occupation</b> N/A <b>Aggregate contributions year-to-date</b> \$ 135000	<b>Amount of contribution</b> \$ 75000 <b>Date of contribution</b> 10/22/2014
<b>Contributor's name, mailing address and ZIP code</b> MARK GODDARD 8149 S. 2425 E. OGDEN, UT 84405	<b>Name of contributor's employer</b> SELF-EMPLOYED <b>Contributor's occupation</b> CAR WASHER <b>Aggregate contributions year-to-date</b> \$ 200	<b>Amount of contribution</b> \$ 200 <b>Date of contribution</b> 10/01/2014
<b>Contributor's name, mailing address and ZIP code</b> BARBARA MARKO 1132 WOBURN GREEN BLOOMFIELD HILLS, MI 48302	<b>Name of contributor's employer</b> N/A <b>Contributor's occupation</b> N/A <b>Aggregate contributions year-to-date</b> \$ 175	<b>Amount of contribution</b> \$ 35 <b>Date of contribution</b> 10/31/2014

## **EXHIBIT C**

**Political Organization  
Notice of Section 527 Status**

OMB No. 1545-1693

**Part I General Information**

**1 Name of organization** Republican State Leadership Committee - RSLC  
**Employer identification number** 05 - 0532524

**2 Mailing address (P.O. box or number, street, and room or suite number)**  
1201 F Street NW Suite 675

**City or town, state, and ZIP code**  
Washington, DC 20004 -

**3 Check applicable box:** ☐ Initial notice ☒ Amended notice ☐ Final notice

**4a Date established** 09/25/2002  
**4b Date of material change** 02/20/2015

**5 E-mail address of organization**  
rslc@rslc.gop

**6a Name of custodian of records** Staci A. Goede  
**6b Custodian's address** 1201 F Street NW Suite 675  
Washington, DC 20004 -

**7a Name of contact person** Matthew C. Walter  
**7b Contact person's address** 1201 F Street NW Suite 675  
Washington, DC 20004 -

**8 Business address of organization (if different from mailing address shown above). Number, street, and room or suite number**  
1201 F Street NW Suite 675

**City or town, state, and ZIP code**  
Washington, DC 20004 -

**9a Election authority** NONE  
**9b Election authority identification number**

**Part II Notification of Claim of Exemption From Filing Certain Forms (see instructions)**

**10a Is this organization claiming exemption from filing Form 8872, Political Organization Report of Contributions and Expenditures, as a qualified state or local political organization?** Yes ☐ No ☒

**10b If 'Yes,' list the state where the organization files reports:**

**11 Is this organization claiming exemption from filing Form 990 (or 990-EZ), Return of Organization Exempt from Income Tax, as a caucus or associations of state or local officials?** Yes ☒ No ☐

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**Part III Purpose**

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**12 Describe the purpose of the organization**

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Caucus of Republican state elected officials and leaders promoting Republican issues and the election of state Republican candidates.

**Part IV List of All Related Entities** (see instructions)

13 Check if the organization has no related entities

14a Name of related entity	14b Relationship	14c Address
RSLC State of Washington PAC	Affiliated	1201 F Street NW Suite 675 Washington, DC 20004 -
RSLC Missouri PAC	Affiliated	1201 F Street NW Suite 675 Washington, DC 20004 -
Republican State Leadership Committee-Arkansas PAC	Affiliated	1201 F Street NW Suite 675 Washington, DC 20004 -
RSLC Indiana PAC	Affiliated	1201 F Street NW Suite 675 Washington, DC 20004 -
RSLC - Judicial Fairness Initiative Montana PAC	Affiliated	1201 F Street NW Suite 675 Washington, DC 20004 -
RSLC - Judicial Fairness Initiative	Affiliated	1201 F Street NW Suite 675 Washington, DC 20004 -
RSLC Utah PAC	Affiliated	1201 F Street NW Suite 675 Washington, DC 20004 -
RSLC Montana PAC	Affiliated	104 W 2 Ave N Columbus, MT 59019 -
Republican State Leadership Committee-IE Committee	Affiliated	1201 F Street NW Suite 675 Washington, DC 20004 -
State Government Leadership Foundation	Connected	1201 F Street NW Suite 675 Washington, DC 20004 -
RSLC Mississippi PAC	Affiliated	1201 F Street NW Suite 675 Washington, DC 20004 -
RSLC Georgia PAC	Affiliated	1201 F Street NW Suite 675 Washington, DC 20004 -
Republican State Leadership Committee - Hawaii PAC	Affiliated	1201 F Street NW Suite 675 Washington, DC 20004 -

**Part V List of All Officers, Directors, and Highly Compensated Employees** (see instructions)

15a Name	15b Title	15c Address
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Will Weatherford	Board Member	1201 F Street NW Suite 675 Washington, DC 20004 -
Erin Veltman	Deputy Executive Director	1201 F Street NW Suite 675 Washington, DC 20004 -
Karen Handel	Board Member	1201 F Street NW Suite 675 Washington, DC 20004 -
Bill McCollum	Chairman of the Board	1201 F Street NW Suite 675 Washington, DC 20004 -
Justin Richards	Political Director	1201 F Street NW Suite 675 Washington, DC 20004 -
M. Jodi Rell	Board Member	1201 F Street NW Suite 675 Washington, DC 20004 -
Micah Ketchel	In-house Counsel	1201 F Street NW Suite 675 Washington, DC 20004 -
Staci Goede	Secretary, Treasurer and CFO	1201 F Street NW Suite 675 Washington, DC 20004 -
Charles R. Black Jr.	Board Member	1201 F Street NW Suite 675 Washington, DC 20004 -
Scott Binkley	Executive Director, RLGA	1201 F Street NW Suite 675 Washington, DC 20004 -
Christine Toretti	Board Member	1201 F Street NW Suite 675 Washington, DC 20004 -
Christopher Rants	Vice Chairman of the Board	1201 F Street NW Suite 675 Washington, DC 20004 -
Kiley Smith	Executive Director, RLCC	1201 F Street NW Suite 675 Washington, DC 20004 -
Matthew Walter	President	1201 F Street NW Suite 675 Washington, DC 20004 -
Luis Fortuno	Board Member	1201 F Street NW Suite 675 Washington, DC 20004 -

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Under penalties of perjury, I declare that the organization named in Part I is to be treated as a tax-exempt organization described in section 527 of the Internal Revenue Code, and that I have examined this notice, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. I further declare that I am the official authorized to sign this report, and I am signing by entering my name below.

Matthew C Walter

03/11/2015

**Sign  
Here**

▶ \_\_\_\_\_  
Name of authorized official

▶ \_\_\_\_\_  
Date

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## **EXHIBIT D**

## Return of Organization Exempt From Income Tax

OMB No 1545-0047

2010

Open to Public Inspection

Department of the Treasury  
Internal Revenue Service

Under section 501(c), 527, or 4947(a)(1) of the Internal Revenue Code (except black lung benefit trust or private foundation)

▶ The organization may have to use a copy of this return to satisfy state reporting requirements.

**A** For the 2010 calendar year, or tax year beginning FEBRUARY 26, 2010, and ending DECEMBER 31, 2010

**B** Check if applicable:  
☒ Address change  
☐ Name change  
☒ Initial return  
☐ Terminated  
☐ Amended return  
☒ Application pending

**C** Name of organization MICHIGAN CITIZENS FOR FISCAL RESPONSIBILITY  
 Doing Business As MICHIGAN CITIZENS FOR FISCAL RESPONSIBILITY  
 Number and street (or P.O. box if mail is not delivered to street address) Room/suite  
112 E ALLEGAN STE 700  
 City or town, state or country, and ZIP + 4  
ANSING, MI 48933

**D** Employer identification number 27-1993953

**E** Telephone number 517 267-9012

**G** Gross receipts \$ 1,296,100

**F** Name and address of principal officer  
JEFF TIMMER - SAME ADDRESS AS ABOVE

**H(a)** Is this a group return for affiliates? ☐ Yes ☒ No  
**H(b)** Are all affiliates included? ☐ Yes ☒ No  
 If "No," attach a list (see instructions)  
**H(c)** Group exemption number ▶

**I** Tax-exempt status ☐ 501(c)(3) ☒ 501(c) ( 4 ) ◀ (insert no) ☐ 4947(a)(1) or ☐ 527

**J** Website: ▶ NA

**K** Form of organization ☒ Corporation ☐ Trust ☐ Association ☐ Other ▶

**L** Year of formation 2010 **M** State of legal domicile MI

## Part I Summary

**1** Briefly describe the organization's mission or most significant activities:  
INFORMATION AND EDUCATION ON FISCAL PUBLIC POLICY ISSUES

**2** Check this box ☐ if the organization discontinued its operations or disposed of more than 25% of its net assets

**3** Number of voting members of the governing body (Part VI, line 1a) 3

**4** Number of independent voting members of the governing body (Part VI, line 1b) 0

**5** Total number of individuals employed in calendar year 2010 (Part V, line 2a) 0

**6** Total number of volunteers (estimate if necessary) 0

**7a** Total unrelated business revenue from Part VIII, column (C), line 12 0

**7b** Net unrelated business taxable income from Form 990-T, line 54 0

	Prior Year	Current Year
<b>8</b> Contributions and grants (Part VIII, line 1h) <u>047</u>	<u>0</u>	<u>1,296,000</u>
<b>9</b> Program service revenue (Part VIII, line 2g)	<u>0</u>	<u>0</u>
<b>10</b> Investment income (Part VIII, column (A), lines 3, 4, and 7d)	<u>0</u>	<u>100</u>
<b>11</b> Other revenue (Part VIII, column (A), lines 5, 6d, 8c, 9c, 10c, and 11a) <u>0005N, UT</u>	<u>0</u>	<u>0</u>
<b>12</b> Total revenue—add lines 8 through 11 (must equal Part VIII, column (A), line 12)	<u>0</u>	<u>1,296,100</u>
<b>13</b> Grants and similar amounts paid (Part IX, column (A), lines 1–3)	<u>0</u>	<u>0</u>
<b>14</b> Benefits paid to or for members (Part IX, column (A), line 4)	<u>0</u>	<u>0</u>
<b>15</b> Salaries, other compensation, employee benefits (Part IX, column (A), lines 5–10)	<u>0</u>	<u>0</u>
<b>16a</b> Professional fundraising fees (Part IX, column (A), line 11e)	<u>0</u>	<u>0</u>
<b>b</b> Total fundraising expenses (Part IX, column (D), line 25) ▶ <u>0</u>		
<b>17</b> Other expenses (Part IX, column (A), lines 11a–11d, 11f–24f)	<u>0</u>	<u>1,287,971</u>
<b>18</b> Total expenses Add lines 13–17 (must equal Part IX, column (A), line 25)	<u>0</u>	<u>1,287,971</u>
<b>19</b> Revenue less expenses. Subtract line 18 from line 12	<u>0</u>	<u>8,129</u>
<b>20</b> Total assets (Part X, line 16)	Beginning of Current Year	End of Year
<b>21</b> Total liabilities (Part X, line 26)	<u>0</u>	<u>8,129</u>
<b>22</b> Net assets or fund balances Subtract line 21 from line 20	<u>0</u>	<u>1,534</u>
		<u>6,595</u>

## Part II Signature Block

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge

**Sign Here** Signature of officer Jeff Timmer Date Aug 15, 2011  
 Type or print name and title PRESIDENT & SECRETARY

**Paid Preparer Use Only** Print/Type preparer's name Preparer's signature Date Check ☐ if self-employed PTIN  
 Firm's name ▶ Firm's EIN ▶  
 Firm's address ▶ Phone no

May the IRS discuss this return with the preparer shown above? (see instructions) ☐ Yes ☒ No

For Paperwork Reduction Act Notice, see the separate instructions.

Cat No 11282Y

Form 990 (2010)

SCANNED SEP 08 2011

13,11

**Part IV Checklist of Required Schedules**

	Yes	No
1 Is the organization described in section 501(c)(3) or 4947(a)(1) (other than a private foundation)? If "Yes," complete Schedule A . . . . .	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2 Is the organization required to complete Schedule B, Schedule of Contributors? (see instructions) . . . . .	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3 Did the organization engage in direct or indirect political campaign activities on behalf of or in opposition to candidates for public office? If "Yes," complete Schedule C, Part I . . . . .	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4 <b>Section 501(c)(3) organizations.</b> Did the organization engage in lobbying activities, or have a section 501(h) election in effect during the tax year? If "Yes," complete Schedule C, Part II . . . . .	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5 Is the organization a section 501(c)(4), 501(c)(5), or 501(c)(6) organization that receives membership dues, assessments, or similar amounts as defined in Revenue Procedure 98-19? If "Yes," complete Schedule C, Part III . . . . .	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6 Did the organization maintain any donor advised funds or any similar funds or accounts where donors have the right to provide advice on the distribution or investment of amounts in such funds or accounts? If "Yes," complete Schedule D, Part I . . . . .	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7 Did the organization receive or hold a conservation easement, including easements to preserve open space, the environment, historic land areas, or historic structures? If "Yes," complete Schedule D, Part II . . . . .	<input type="checkbox"/>	<input checked="" type="checkbox"/>
8 Did the organization maintain collections of works of art, historical treasures, or other similar assets? If "Yes," complete Schedule D, Part III . . . . .	<input type="checkbox"/>	<input checked="" type="checkbox"/>
9 Did the organization report an amount in Part X, line 21; serve as a custodian for amounts not listed in Part X; or provide credit counseling, debt management, credit repair, or debt negotiation services? If "Yes," complete Schedule D, Part IV . . . . .	<input type="checkbox"/>	<input checked="" type="checkbox"/>
10 Did the organization, directly or through a related organization, hold assets in term, permanent, or quasi-endowments? If "Yes," complete Schedule D, Part V . . . . .	<input type="checkbox"/>	<input checked="" type="checkbox"/>
11 If the organization's answer to any of the following questions is "Yes," then complete Schedule D, Parts VI, VII, VIII, IX, or X as applicable.		
a Did the organization report an amount for land, buildings, and equipment in Part X, line 10? If "Yes," complete Schedule D, Part VI . . . . .	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b Did the organization report an amount for investments—other securities in Part X, line 12 that is 5% or more of its total assets reported in Part X, line 16? If "Yes," complete Schedule D, Part VII . . . . .	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c Did the organization report an amount for investments—program related in Part X, line 13 that is 5% or more of its total assets reported in Part X, line 16? If "Yes," complete Schedule D, Part VIII . . . . .	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d Did the organization report an amount for other assets in Part X, line 15 that is 5% or more of its total assets reported in Part X, line 16? If "Yes," complete Schedule D, Part IX . . . . .	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e Did the organization report an amount for other liabilities in Part X, line 25? If "Yes," complete Schedule D, Part X . . . . .	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f Did the organization's separate or consolidated financial statements for the tax year include a footnote that addresses the organization's liability for uncertain tax positions under FIN 48 (ASC 740)? If "Yes," complete Schedule D, Part X . . . . .	<input type="checkbox"/>	<input checked="" type="checkbox"/>
12 a Did the organization obtain separate, independent audited financial statements for the tax year? If "Yes," complete Schedule D, Parts XI, XII, and XIII . . . . .	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b Was the organization included in consolidated, independent audited financial statements for the tax year? If "Yes," and if the organization answered "No" to line 12a, then completing Schedule D, Parts XI, XII, and XIII is optional . . . . .	<input type="checkbox"/>	<input checked="" type="checkbox"/>
13 Is the organization a school described in section 170(b)(1)(A)(ii)? If "Yes," complete Schedule E . . . . .	<input type="checkbox"/>	<input checked="" type="checkbox"/>
14 a Did the organization maintain an office, employees, or agents outside of the United States? . . . . .	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b Did the organization have aggregate revenues or expenses of more than \$10,000 from grantmaking, fundraising, business, and program service activities outside the United States? If "Yes," complete Schedule F, Parts I and IV . . . . .	<input type="checkbox"/>	<input checked="" type="checkbox"/>
15 Did the organization report on Part IX, column (A), line 3, more than \$5,000 of grants or assistance to any organization or entity located outside the United States? If "Yes," complete Schedule F, Parts II and IV . . . . .	<input type="checkbox"/>	<input checked="" type="checkbox"/>
16 Did the organization report on Part IX, column (A), line 3, more than \$5,000 of aggregate grants or assistance to individuals located outside the United States? If "Yes," complete Schedule F, Parts III and IV . . . . .	<input type="checkbox"/>	<input checked="" type="checkbox"/>
17 Did the organization report a total of more than \$15,000 of expenses for professional fundraising services on Part IX, column (A), lines 6 and 11e? If "Yes," complete Schedule G, Part I (see instructions) . . . . .	<input type="checkbox"/>	<input checked="" type="checkbox"/>
18 Did the organization report more than \$15,000 total of fundraising event gross income and contributions on Part VIII, lines 1c and 8a? If "Yes," complete Schedule G, Part II . . . . .	<input type="checkbox"/>	<input checked="" type="checkbox"/>
19 Did the organization report more than \$15,000 of gross income from gaming activities on Part VIII, line 9a? If "Yes," complete Schedule G, Part III . . . . .	<input type="checkbox"/>	<input checked="" type="checkbox"/>
20 a Did the organization operate one or more hospitals? If "Yes," complete Schedule H . . . . .	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b If "Yes" to line 20a, did the organization attach its audited financial statements to this return? <b>Note.</b> Some Form 990 filers that operate one or more hospitals must attach audited financial statements (see instructions) . . . . .	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**SCHEDULE C**  
**(Form 990 or 990-EZ)**

**Political Campaign and Lobbying Activities**

OMB No 1545-0047

**2010**

**Open to Public  
Inspection**

Department of the Treasury  
Internal Revenue Service

**For Organizations Exempt From Income Tax Under section 501(c) and section 527**

▶ **Complete if the organization is described below.** ▶ **Attach to Form 990 or Form 990-EZ.**  
▶ **See separate instructions.**

**If the organization answered "Yes," to Form 990, Part IV, line 3, or Form 990-EZ, Part V, line 46 (Political Campaign Activities), then**

- Section 501(c)(3) organizations Complete Parts I-A and B Do not complete Part I-C
- Section 501(c) (other than section 501(c)(3)) organizations Complete Parts I-A and C below. Do not complete Part I-B
- Section 527 organizations Complete Part I-A only.

**If the organization answered "Yes," to Form 990, Part IV, line 4, or Form 990-EZ, Part VI, line 47 (Lobbying Activities), then**

- Section 501(c)(3) organizations that have filed Form 5768 (election under section 501(h)) Complete Part II-A Do not complete Part II-B.
- Section 501(c)(3) organizations that have NOT filed Form 5768 (election under section 501(h)) Complete Part II-B Do not complete Part II-A

**If the organization answered "Yes," to Form 990, Part IV, line 5 (Proxy Tax) or Form 990-EZ, Part V, line 35a (Proxy Tax), then**

- Section 501(c)(4), (5), or (6) organizations Complete Part III

Name of organization

Employer identification number

**MICHIGAN CITIZENS FOR FISCAL RESPONSIBILITY**

27-1993953

**Part I-A Complete if the organization is exempt under section 501(c) or is a section 527 organization.**

- 1 Provide a description of the organization's direct and indirect political campaign activities in Part IV.
- 2 Political expenditures . . . . . ▶ \$ 271381
- 3 Volunteer hours . . . . . NA

**Part I-B Complete if the organization is exempt under section 501(c)(3).**

- 1 Enter the amount of any excise tax incurred by the organization under section 4955 . . . . . ▶ \$ 0
- 2 Enter the amount of any excise tax incurred by organization managers under section 4955 . . . . . ▶ \$ 0
- 3 If the organization incurred a section 4955 tax, did it file Form 4720 for this year? . . . . . ☐ Yes ☐ No
- 4a Was a correction made? . . . . . ☐ Yes ☐ No
- b If "Yes," describe in Part IV.

**Part I-C Complete if the organization is exempt under section 501(c), except section 501(c)(3).**

- 1 Enter the amount directly expended by the filing organization for section 527 exempt function activities . . . . . ▶ \$ 271381
- 2 Enter the amount of the filing organization's funds contributed to other organizations for section 527 exempt function activities . . . . . ▶ \$ 0
- 3 Total exempt function expenditures. Add lines 1 and 2 Enter here and on Form 1120-POL, line 17b . . . . . ▶ \$ 271381
- 4 Did the filing organization file **Form 1120-POL** for this year? . . . . . ☐ Yes ☐ No
- 5 Enter the names, addresses and employer identification number (EIN) of all section 527 political organizations to which the filing organization made payments. For each organization listed, enter the amount paid from the filing organization's funds. Also enter the amount of political contributions received that were promptly and directly delivered to a separate political organization, such as a separate segregated fund or a political action committee (PAC). If additional space is needed, provide information in Part IV.

(a) Name	(b) Address	(c) EIN	(d) Amount paid from filing organization's funds If none, enter -0-	(e) Amount of political contributions received and promptly and directly delivered to a separate political organization If none, enter -0-
(1)				
(2)				
(3)				
(4)				
(5)				
(6)				

For Paperwork Reduction Act Notice, see the Instructions for Form 990 or 990-EZ.

Cat. No 50084S

Schedule C (Form 990 or 990-EZ) 2010

**Part II-A** Complete if the organization is exempt under section 501(c)(3) and filed Form 5768 (election under section 501(h)).**A** Check ☐ if the filing organization belongs to an affiliated group.**B** Check ☐ if the filing organization checked box A and "limited control" provisions apply.

Limits on Lobbying Expenditures (The term "expenditures" means amounts paid or incurred.)		(a) Filing organization's totals	(b) Affiliated group totals												
<b>1a</b>	Total lobbying expenditures to influence public opinion (grass roots lobbying) . . . . .														
<b>b</b>	Total lobbying expenditures to influence a legislative body (direct lobbying) . . . . .														
<b>c</b>	Total lobbying expenditures (add lines 1a and 1b) . . . . .														
<b>d</b>	Other exempt purpose expenditures . . . . .														
<b>e</b>	Total exempt purpose expenditures (add lines 1c and 1d) . . . . .														
<b>f</b>	Lobbying nontaxable amount. Enter the amount from the following table in both columns														
<table border="1"> <thead> <tr> <th>If the amount on line 1e, column (a) or (b) is:</th> <th>The lobbying nontaxable amount is:</th> </tr> </thead> <tbody> <tr> <td>Not over \$500,000</td> <td>20% of the amount on line 1e.</td> </tr> <tr> <td>Over \$500,000 but not over \$1,000,000</td> <td>\$100,000 plus 15% of the excess over \$500,000.</td> </tr> <tr> <td>Over \$1,000,000 but not over \$1,500,000</td> <td>\$175,000 plus 10% of the excess over \$1,000,000.</td> </tr> <tr> <td>Over \$1,500,000 but not over \$17,000,000</td> <td>\$225,000 plus 5% of the excess over \$1,500,000.</td> </tr> <tr> <td>Over \$17,000,000</td> <td>\$1,000,000.</td> </tr> </tbody> </table>		If the amount on line 1e, column (a) or (b) is:	The lobbying nontaxable amount is:	Not over \$500,000	20% of the amount on line 1e.	Over \$500,000 but not over \$1,000,000	\$100,000 plus 15% of the excess over \$500,000.	Over \$1,000,000 but not over \$1,500,000	\$175,000 plus 10% of the excess over \$1,000,000.	Over \$1,500,000 but not over \$17,000,000	\$225,000 plus 5% of the excess over \$1,500,000.	Over \$17,000,000	\$1,000,000.		
If the amount on line 1e, column (a) or (b) is:	The lobbying nontaxable amount is:														
Not over \$500,000	20% of the amount on line 1e.														
Over \$500,000 but not over \$1,000,000	\$100,000 plus 15% of the excess over \$500,000.														
Over \$1,000,000 but not over \$1,500,000	\$175,000 plus 10% of the excess over \$1,000,000.														
Over \$1,500,000 but not over \$17,000,000	\$225,000 plus 5% of the excess over \$1,500,000.														
Over \$17,000,000	\$1,000,000.														
<b>g</b>	Grassroots nontaxable amount (enter 25% of line 1f) . . . . .														
<b>h</b>	Subtract line 1g from line 1a. If zero or less, enter -0- . . . . .														
<b>i</b>	Subtract line 1f from line 1c. If zero or less, enter -0- . . . . .														
<b>j</b>	If there is an amount other than zero on either line 1h or line 1i, did the organization file Form 4720 reporting section 4911 tax for this year? . . . . .														

☐ Yes ☐ No**4-Year Averaging Period Under Section 501(h)**

(Some organizations that made a section 501(h) election do not have to complete all of the five columns below. See the instructions for lines 2a through 2f on page 4.)

Lobbying Expenditures During 4-Year Averaging Period					
Calendar year (or fiscal year beginning in)	(a) 2007	(b) 2008	(c) 2009	(d) 2010	(e) Total
<b>2a</b> Lobbying nontaxable amount					
<b>b</b> Lobbying ceiling amount (150% of line 2a, column (e))					
<b>c</b> Total lobbying expenditures					
<b>d</b> Grassroots nontaxable amount					
<b>e</b> Grassroots ceiling amount (150% of line 2d, column (e))					
<b>f</b> Grassroots lobbying expenditures					

**Part II-B** Complete if the organization is exempt under section 501(c)(3) and has NOT filed Form 5768 (election under section 501(h)).

	(a)		(b)
	Yes	No	Amount
<b>1</b> During the year, did the filing organization attempt to influence foreign, national, state or local legislation, including any attempt to influence public opinion on a legislative matter or referendum, through the use of:			
<b>a</b> Volunteers?			
<b>b</b> Paid staff or management (include compensation in expenses reported on lines 1c through 1i)?			
<b>c</b> Media advertisements?			
<b>d</b> Mailings to members, legislators, or the public?			
<b>e</b> Publications, or published or broadcast statements?			
<b>f</b> Grants to other organizations for lobbying purposes?			
<b>g</b> Direct contact with legislators, their staffs, government officials, or a legislative body?			
<b>h</b> Rallies, demonstrations, seminars, conventions, speeches, lectures, or any similar means?			
<b>i</b> Other activities? If "Yes," describe in Part IV			
<b>j</b> Total. Add lines 1c through 1i			
<b>2a</b> Did the activities in line 1 cause the organization to be not described in section 501(c)(3)?			
<b>b</b> If "Yes," enter the amount of any tax incurred under section 4912			
<b>c</b> If "Yes," enter the amount of any tax incurred by organization managers under section 4912			
<b>d</b> If the filing organization incurred a section 4912 tax, did it file Form 4720 for this year?			

**Part III-A** Complete if the organization is exempt under section 501(c)(4), section 501(c)(5), or section 501(c)(6).

	Yes	No
<b>1</b> Were substantially all (90% or more) dues received nondeductible by members?	<b>1</b> ✓	
<b>2</b> Did the organization make only in-house lobbying expenditures of \$2,000 or less?	<b>2</b> ✓	
<b>3</b> Did the organization agree to carryover lobbying and political expenditures from the prior year?	<b>3</b>	✓

**Part III-B** Complete if the organization is exempt under section 501(c)(4), section 501(c)(5), or section 501(c)(6) if BOTH Part III-A, lines 1 and 2 are answered "No" OR if Part III-A, line 3 is answered "Yes."

<b>1</b> Dues, assessments and similar amounts from members	<b>1</b>	
<b>2</b> Section 162(e) nondeductible lobbying and political expenditures (do not include amounts of political expenses for which the section 527(f) tax was paid).		
<b>a</b> Current year	<b>2a</b>	
<b>b</b> Carryover from last year	<b>2b</b>	
<b>c</b> Total	<b>2c</b>	
<b>3</b> Aggregate amount reported in section 6033(e)(1)(A) notices of nondeductible section 162(e) dues	<b>3</b>	
<b>4</b> If notices were sent and the amount on line 2c exceeds the amount on line 3, what portion of the excess does the organization agree to carryover to the reasonable estimate of nondeductible lobbying and political expenditure next year?	<b>4</b>	
<b>5</b> Taxable amount of lobbying and political expenditures (see instructions)	<b>5</b>	

**Part IV** Supplemental Information

Complete this part to provide the descriptions required for Part I-A, line 1; Part I-B, line 4; Part I-C, line 5; and Part II-B, line 1i. Also, complete this part for any additional information.

# **EXHIBIT E**

Form **990****Return of Organization Exempt From Income Tax**

OMB No 1545-0047

**2012****Open to Public Inspection**Department of the Treasury  
Internal Revenue Service

Under section 501(c), 527, or 4947(a)(1) of the Internal Revenue Code (except black lung benefit trust or private foundation)

▶ The organization may have to use a copy of this return to satisfy state reporting requirements

<b>A</b> For the 2012 calendar year, or tax year beginning		, 2012, and ending		, 20	
<b>B</b> Check if applicable: <input type="checkbox"/> Address change <input type="checkbox"/> Name change <input type="checkbox"/> Initial return <input type="checkbox"/> Terminated <input type="checkbox"/> Amended return <input type="checkbox"/> Application pending	<b>C</b> Name of organization <b>MICHIGAN CITIZENS FOR FISCAL RESPONSIBILITY</b>				<b>D</b> Employer identification number 27-1993953
	Doing Business As				<b>E</b> Telephone number 734-834-1030
	Number and street (or P O box if mail is not delivered to street address)		Room/suite		
	106 WEST ALLEGAN STREET, STE 200				G Gross receipts \$ 1,026,000
	City, town or post office, state, and ZIP code LANSING, MI 48933				
	<b>F</b> Name and address of principal officer				H(a) Is this a group return for affiliates? <input type="checkbox"/> Yes <input type="checkbox"/> No
I Tax-exempt status <input type="checkbox"/> 501(c)(3) <input type="checkbox"/> 501(c) ( 4 ) ◀ (insert no) <input type="checkbox"/> 4947(a)(1) or <input type="checkbox"/> 527				H(b) Are all affiliates included? <input type="checkbox"/> Yes <input type="checkbox"/> No If "No," attach a list (see instructions)	
J Website: ▶					
K Form of organization <input type="checkbox"/> Corporation <input type="checkbox"/> Trust <input type="checkbox"/> Association <input type="checkbox"/> Other ▶				L Year of formation 2010	M State of legal domicile MI

**Part I Summary**

<b>Activities &amp; Governance</b>	<b>1</b> Briefly describe the organization's mission or most significant activities: Inform and educate public on fiscal policy issues.1			
	<b>2</b> Check this box <input type="checkbox"/> if the organization discontinued its operations or disposed of more than 25% of its net assets.			
	<b>3</b> Number of voting members of the governing body (Part VI, line 1a)	<b>3</b>	<b>3</b>	
	<b>4</b> Number of independent voting members of the governing body (Part VI, line 1b)	<b>4</b>	<b>0</b>	
	<b>5</b> Total number of individuals employed in calendar year 2012 (Part V, line 2a)	<b>5</b>	<b>0</b>	
	<b>6</b> Total number of volunteers (estimate if necessary)	<b>6</b>	<b>0</b>	
<b>7a</b> Total unrelated business revenue from Part VIII, column (A), line 12	<b>7a</b>	<b>0</b>		
	<b>7b</b> Net unrelated business taxable income from Form 990-T, line 34	<b>7b</b>	<b>0</b>	
<b>Revenue</b>	<b>8</b> Contributions and grants (Part VII, line 1h)	Prior Year	Current Year	
	<b>9</b> Program service revenue (Part VIII, line 2g)	50,000	1,026,000	
	<b>10</b> Investment income (Part VIII, column (A), lines 5, 6d, 8c, 9c, 10c, and 11e)			
	<b>11</b> Other revenue (Part VIII, column (A), lines 5, 6d, 8c, 9c, 10c, and 11e)			
	<b>12</b> Total revenue—add lines 8 through 11 (must equal Part VIII, column (A), line 12)	50,000	1,026,000	
<b>Expenses</b>	<b>13</b> Grants and similar amounts paid (Part IX, column (A), lines 1–3)			
	<b>14</b> Benefits paid to or for members (Part IX, column (A), line 4)			
	<b>15</b> Salaries, other compensation, employee benefits (Part IX, column (A), lines 5–10)			
	<b>16a</b> Professional fundraising fees (Part IX, column (A), line 11e)			108,500
	<b>b</b> Total fundraising expenses (Part IX, column (D), line 25) ▶			
	<b>17</b> Other expenses (Part IX, column (A), lines 11a–11d, 11f–24e)	56,523	917,500	
	<b>18</b> Total expenses. Add lines 13–17 (must equal Part IX, column (A), line 25)	56,523	1,026,000	
<b>19</b> Revenue less expenses. Subtract line 18 from line 12	<523>	0		
<b>Net Assets or Fund Balances</b>	<b>20</b> Total assets (Part X, line 16)	Beginning of Current Year	End of Year	
	<b>21</b> Total liabilities (Part X, line 26)	72	72	
	<b>22</b> Net assets or fund balances. Subtract line 21 from line 20	0	0	

**Part II Signature Block**

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.

**Sign Here** Signature of officer Jeffrey Timmer Date 10/9/13  
Type or print name and title JEFFREY TIMMER, PRESIDENT

**Paid Preparer Use Only** Print/Type preparer's name \_\_\_\_\_ Preparer's signature \_\_\_\_\_ Date \_\_\_\_\_ Check ☐ if self-employed PTIN \_\_\_\_\_  
Firm's name ▶ \_\_\_\_\_ Firm's EIN ▶ \_\_\_\_\_  
Firm's address ▶ \_\_\_\_\_ Phone no \_\_\_\_\_

May the IRS discuss this return with the preparer shown above? (see instructions) ☐ Yes ☐ No

For Paperwork Reduction Act Notice, see the separate instructions.

Cat No 11282Y

Form 990 (2012)

SCANNED NOV 12 2013

9B-16 8

SCHEDULE I  
(Form 990)

Grants and Other Assistance to Organizations,  
Governments, and Individuals in the United States

Complete if the organization answered "Yes" to Form 990, Part IV, line 21 or 22.

Department of the Treasury  
Internal Revenue Service

Name of the organization

MICHIGAN CITIZENS FOR FISCAL RESPONSIBILITY

OMB No 1545-0047

2012

Open to Public  
Inspection

Employer identification number

27-1993953

Part I General Information on Grants and Assistance

- 1 Does the organization maintain records to substantiate the amount of the grants or assistance, the grantees' eligibility for the grants or assistance, and the selection criteria used to award the grants or assistance? ☐ Yes ☐ No
- 2 Describe in Part IV the organization's procedures for monitoring the use of grant funds in the United States.

Part II Grants and Other Assistance to Governments and Organizations in the United States. Complete if the organization answered "Yes" to Form 990, Part IV, line 21, for any recipient that received more than \$5,000. Part II can be duplicated if additional space is needed.

1 (a) Name and address of organization or government	(b) EIN	(c) IRC section if applicable	(d) Amount of cash grant	(e) Amount of non-cash assistance	(f) Method of valuation (book, FMV, appraisal, other)	(g) Description of non-cash assistance	(h) Purpose of grant or assistance
(1) Citizens for Fiscal Responsibility Po Box 16062, Lansing, MI 48901	30-0721877	527	25,000	0			Direct Contribution
(2) Americans for Job Security 107 S West St PMB 551, Alexandria, V	52-2062978	c4	425,000	0			Membership
(3)							
(4)							
(5)							
(6)							
(7)							
(8)							
(9)							
(10)							
(11)							
(12)							

2 Enter total number of section 501(c)(3) and government organizations listed in the line 1 table

3 Enter total number of other organizations listed in the line 1 table

For Paperwork Reduction Act Notice, see the Instructions for Form 990.

Cat No 50055P

Schedule I (Form 990) (2012)

**Part III** **Grants and Other Assistance to Individuals in the United States.** Complete if the organization answered "Yes" to Form 990, Part IV, line 22.  
 Part III can be duplicated if additional space is needed.

	(a) Type of grant or assistance	(b) Number of recipients	(c) Amount of cash grant	(d) Amount of non-cash assistance	(e) Method of valuation (book, FMV, appraisal, other)	(f) Description of non-cash assistance
1						
2						
3						
4						
5						
6						
7						

**Part IV** **Supplemental Information.** Complete this part to provide the information required in Part I, line 2, Part III, column (b), and any other additional information.

# **EXHIBIT 5**

[Home > Events](#)

## Senate Majority Leader Mike Shirkey Reception

Posted by Madalyn Holyfield 14sc on September 25, 2019

### Senate Majority Leader Mike Shirkey Reception

**RSVP:** Heather at 517-927-3706 or [hlombardini@sterlingcorporation.com](mailto:hlombardini@sterlingcorporation.com)

Please make checks payable to Michigan! My Michigan!

Details coming soon...

#### WHEN

October 23, 2019 at 8am - 9:30am

#### WHERE

MI Beer & Wine Wholesalers Association

332 Townsend St

Lansing, MI 48933

United States

[Google map and directions](#)

Will you come?

**First Name**

**Last Name**

**Email**

**Mobile phone (optional)**

☒ **Send me email updates**

☒ **Send me text messages**

**How many other people are you bringing?**

☐ **Don't publish my RSVP on the website**

Send RSVP

**BE THE FIRST TO COMMENT**

**Sign in with**



Sign in with Facebook



Sign in with Twitter

**Or sign in with email**

Email Address

Password

☒ Remember me

or [Create an account](#)

[Post your comment](#)



Sign



Sign



Sign

Facebook

Twitter

Email

# Senate Republicans

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Lansing, MI 48901

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Like Share 1.3K people like this. Sign Up to see what your friends like.

**AFFIDAVIT OF JEFFREY TIMMER**

**STATE OF MICHIGAN )**

**COUNTY OF IONIA )**

Jeffrey Timmer, being first duly sworn, deposes and says:

1. I have personal knowledge of the facts stated herein and if called as a witness could testify competently thereto.

2. I was first hired by the Michigan Legislature in 1991 as a special assistant to the House Republican Leader. Since then, I have worked in the Michigan Senate as deputy communications director, as political director for the Senate Republican Campaign Committee, managed several federal and ballot issue campaigns, and been a private sector public affairs and campaign consultant. From 2000-2005 and from 2009-2014, I was employed at the Sterling Corporation in Lansing, Michigan. In 2009 I became a partner and co-owner of Sterling. I also served as the executive director of the Michigan Republican Party. I was appointed by the governor and served several years on the Michigan Board of State Canvassers.

3. In 2010, my partner Steven Linder and I sought to make Sterling the one-stop shop for all of the Senate GOP Caucus' political and communications needs.

4. In 2010, Linder and I created Michigan Citizens for Fiscal Responsibility, a nonprofit corporation operating as an IRC 501(c)(4).

5. Linder and I used MCFR to assist Senator Randy Richardville in his quest to become Senate Majority Leader using it to support GOP Senate candidates in the November, 2010 general election through issue ads.

6. When Richardville became Senate Majority Leader in 2011 Sterling became the principal consultant to the Senate Republican Campaign Committee ("SRCC").

7. MCFR was used to fund issue ads in 2014 Senate General Elections.

8. Sterling has continued to have a close working relationship with the SRCC from 2011 to the present.

9. In the 1990 cycle Fred Wszolek was lead strategist and ad maker at the GOP firm Marketing Resource Group and chief outside strategist for the SRCC. In the 1994 cycle, he was the Senate Majority Communications Director and also served as executive director to the SRCC. In the 1998 cycle, Wszolek was the chief outside strategist, ad maker, and mail vendor to the SRCC. In the 2002 cycle he worked for Sterling as a vendor to the SRCC. In the 2006 cycle Wszolek was a SRCC vendor and handled independent expenditures and issue ads in the Senate elections for the Michigan GOP. During the 2010 and 2014 cycles Wszolek played no role in Senate elections.

10. Wszolek has been part of Senator Mike Shirkey's inner circle since Shirkey became Senate Majority Leader in 2019. Wszolek created and runs Unlock Michigan.

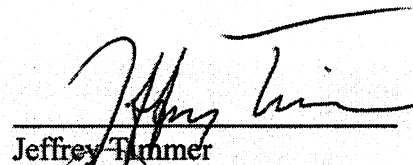
11. Many SRCC vendors are also working for Unlock.

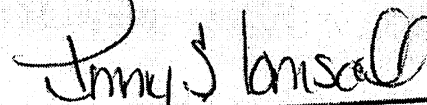
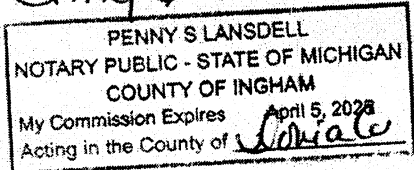
12. I have worked for and against many ballot questions in Michigan. I am familiar with their logistical and cash flow needs.

13. I have worked with National Petition Management ("NPM") and am familiar with its contracts, signature collection, and payment practices. NPM requires a large deposit/retainer before beginning signature collection, and regular large periodic payments on an agreed upon schedule as it collects signatures.

14. In 2018 Brad Pischea was a Senate GOP staffer.

FURTHER DEPONENT SAYETH NOT.

  
Jeffrey Thummer

 4/22/21  


**AFFIDAVIT OF ROBERT S. LABRANT**

STATE OF MICHIGAN )  
 )  
COUNTY OF INGHAM )

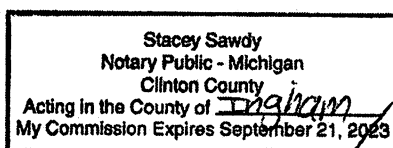
Robert S. LaBrant, being first duly sworn, deposes and says:

1. I have personal knowledge of the facts stated herein and if called as a witness could testify competently thereto.
2. I was employed by the Michigan Chamber of Commerce from 1977 until 2012, retiring as Senior Vice President, Political Affairs and General Counsel.
3. While working at the Chamber I was, among other things, extensively involved in Michigan campaign finance, redistricting, ballot question, voting rights, candidate election, and fundraising matters.
4. After retiring from the Chamber I was a part-time employee of the Sterling Corporation in Lansing, Michigan from March 1, 2012 until June 30, 2017.
5. After leaving Sterling I started a part-time consulting business, LaBrant Strategies, LLC, and I have continued to observe and be involved in Michigan politics.
6. Sterling has had a close working relationship with the Senate Republican Campaign Committee from 2011 to the present.
7. While a Sterling employee, I served as a director of Michigan Citizens for Fiscal Responsibility from 2014-17.
8. I have worked for and against many ballot questions in Michigan. I am familiar with their logistical and cash flow needs.
9. I have worked with National Petition Management ("NPM") and am familiar with its contracts, signature collection, and payment practices. NPM requires a large deposit/retainer before beginning signature collection, and regular large periodic payments on an agreed upon schedule as it collects signatures.

FURTHER DEPONENT SAYETH NOT.

*Stacey Sawdy*

*Robert S. LaBrant*  
Robert S. LaBrant





STATE OF MICHIGAN  
JOCELYN BENSON, SECRETARY OF STATE  
DEPARTMENT OF STATE  
LANSING

June 3, 2021

Eric Doster  
Unlock Michigan  
2145 Commons Parkway  
Okemos, MI 48872

Michigan Citizens for Fiscal Responsibility  
106 W. Allegan Street  
Lansing, MI 48933

Michigan! My Michigan!  
106 W. Allegan Street  
Lansing, MI 48933

Dear Mr. Doster, Michigan Citizens for Fiscal Responsibility & Michigan! My Michigan!:

The Department of State (Department) received a formal complaint filed by Robert LaBrant against you, alleging that you violated the Michigan Campaign Finance Act (MCFA or Act), 1976 PA 388, MCL 169.201 *et seq.* A copy of the complaint and supporting documentation is enclosed with this letter.

Section 24 requires committees to file a statement of organization with the proper filing official within 10 days after the committee is formed. MCL 169.224(1). Section 24 details specific requirements for all statement of organizations that must be filed. See MCL 169.224(2)-(3). A candidate who fails to form a candidate committee within 10 days is subject to a civil fine up to \$1,000. MCL 169.221(13). Failure to file a statement of organization shall pay a late filing fee of \$10.00 per business day the report isn't filed not to exceed \$300. MCL 169.224(1). A person failing to file a statement of organization after 30 days, is guilty of a misdemeanor punishable by a fine up to \$1,000.

After formation, committees must file reports disclosing their contributions and expenditures as set forth in sections 33 and/or 34 of the Act. The MCFA requires a committee that receives or expends more than \$1,000 during any election to file campaign finance reports in compliance with the Act. MCL 169.233(6). A person who knowingly omits or underreports expenditures required to be disclosed by the Act is subject to a civil fine of not more than \$1,000 or the amount of the expenditures omitted or underreported, whichever is greater. MCL 169.233(11).

Mr. LaBrant alleges that Michigan Citizens for Fiscal Responsibility (MCFR) and Michigan! My Michigan! (MMM) have solicited contributions for the purposes of making expenditures to Unlock Michigan. Mr. LaBrant alleges that MCFR and MMM coordinated with Unlock to make such contributions in violation of the Act.

The purpose of this letter is to inform you of the Department's examination of these matters and your right to respond to the allegations before the Department proceeds further. It is important to understand that the Department is neither making this complaint nor accepting the allegations as true. The investigation and resolution of this complaint is governed by section 15 of the Act and the corresponding administrative rules, R 169.51 *et seq.* An explanation of the investigation process is enclosed with this letter and a copy is available on the Department's [website](#). **If you wish to file a written response to this complaint, you are required to do so within 15 business days of the date of this letter.** Your response may include any written statement or additional documentary evidence you wish to submit.

All materials must be sent to the Department of State, Bureau of Elections, Richard H. Austin Building, 1<sup>st</sup> Floor, 430 West Allegan Street, Lansing, Michigan 48918. Materials should also be sent via email to [Elections@Michigan.gov](mailto:Elections@Michigan.gov) given the ongoing public health pandemic. If you fail to submit a response, the Department will render a decision based on the evidence furnished by the complainant.

A copy of your answer will be provided to Mr. LaBrant, who will have an opportunity to submit a rebuttal statement to the Department. After reviewing all of the statements and materials provided by the parties, the Department will determine whether "there may be reason to believe that a violation of [the MCFA] has occurred [.]". MCL 169.215(10). Note that the Department's enforcement powers include the possibility of entering a conciliation agreement, conducting an administrative hearing, or referring this matter to the Attorney General for enforcement of the criminal penalties provided in section 24(1) of the Act.

Sincerely,



Adam Fracassi  
Bureau of Elections  
Michigan Department of State

c: Robert LaBrant

Brian D. Shekell  
T (313) 965-8803  
F (313) 309-6833  
Email:BShekell@ClarkHill.com

Clark Hill  
500 Woodward Ave., Suite 3500  
Detroit, MI 48226  
T (313) 965-8300  
F (313) 965-8252

July 16, 2021

Adam Fracassi  
Bureau of Elections  
Michigan Department of State  
430 W. Allegan, First Floor  
Lansing, MI 48918

***Re: Response of Michigan Citizens for Fiscal Responsibility and Michigan! My Michigan! to Complaint Dated May 25, 2021 filed by Robert LaBrant***

Dear Mr. Fracassi:

This office represents Michigan Citizens for Fiscal Responsibility (“MCFR”) and Michigan! My Michigan! (“MMM”) (collectively, the “Respondents”) in the above-referenced matter. We are in receipt of your letter dated June 3, 2021, in which you notify Respondents that a new Complaint was filed by Robert LaBrant.<sup>1</sup> Please allow this letter to serve as Respondents’ response to the Complaint and a request that it be dismissed.

In his Complaint, Mr. LaBrant asserts that MCFR and MMM illegally “coordinated” with Unlock Michigan in violation of the Michigan Campaign Finance Act (“MCFA”). In doing so, the Complaint relies on nearly identical facts and claims as Mr. LaBrant’s August 2020 complaint against MCFR. That Complaint, after thorough briefing and review by the Bureau of Elections, was dismissed because there was “insufficient” evidence to support a finding that MCFR violated the Michigan Campaign Finance Act (“MCFA”). Under established Department of State (“Department”) policies and procedures, the current Complaint is a “successive” complaint of Mr. LaBrant’s August 2020 complaint. It should be summarily dismissed.

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<sup>1</sup> While your June 3, 2021 letter states that a “formal complaint” was filed by Robert LaBrant, and the “Campaign Finance Complaint” identifies the “Complainant” as Robert LaBrant, Respondents question the legitimacy of this designation. The Complaint provided to Respondent is on Goodman Acker letterhead, yet we see no reference to Mr. LaBrant as being affiliated in any way with Goodman Acker on Goodman Acker’s website or in the State Bar Directory. To the extent that this Complaint was submitted on Mr. LaBrant’s behalf by someone at Goodman Acker, no attorney or individual affiliated with this firm is identified in the Complaint. Upon information and belief, the Complaint appears to be prepared in concert with Mark Brewer, a highly partisan and liberal activist who frequently targets conservative causes. It is ironic that Mr. LaBrant and Mr. Brewer complain about a lack of transparency yet conceal Mr. Brewer’s involvement with the Complaint and efforts to work in concert with Mr. LaBrant in opposition to the ballot proposal by not including his name on his own law firm’s letterhead.

Even if the Complaint were allowed to be considered on the merits, which it should not, its allegations cannot withstand scrutiny. At bottom, the Complaint is replete with hyperbole and adjectives designed to let emotion control over facts and the law. While the Complaint conclusively states that there was “coordination” between MCFR, Unlock Michigan and MMM, it fails to set forth any actual facts or evidence to support this claim. Even if such coordination took place, which there was none, the Complaint still fails to articulate how the alleged coordination violated any provision of the MCFA. To the extent the alleged violation involved MCFR or MMM soliciting contributions *for the purpose* of making an expenditure to Unlock Michigan or any other ballot question committee, such allegations have already been made and rejected. The Complaint does not set forth any new facts that changes this outcome.

The current Complaint, like the August 2020 complaint, urges Secretary Benson to adopt and apply new evidentiary standards designed to overcome the otherwise defective arguments set forth by Mr. LaBrant. In doing so, Mr. LaBrant claims that a relaxed “reason to believe” standard should be applied here. This standard is not recognized under Michigan law. Even if it were a viable evidentiary standard, the allegations in the Complaint still fail to meet this low standard. This is because the “reason to believe” test still requires Mr. LaBrant to make the threshold showing that a violation of the MCFA “may have occurred.” Mr. LaBrant has not made this showing. He has presented no information showing that contributions were solicited by MCFR or MMM for the purpose of making an expenditure to Unlock Michigan or any other ballot question committee.

The statements contained in the affidavits of Mr. LaBrant and Mr. Timmer do not alter this conclusion. The affidavits contain outdated, unfounded, and irrelevant claims about the history of these organizations. They fail to set forth a single fact supporting the accusation that contributions were solicited by MCFR or MMM for the purpose of making an expenditure to Unlock Michigan. Regardless, the affidavits do not provide any probative value into whether MCFR or MMM have engaged in a violation of the MCFA.

Simply put, the Complaint sets forth unsupported theories in search of facts and legal violations. It cannot withstand scrutiny and should be dismissed. Mr. LaBrant should also be admonished by the Department of State for filing repetitive frivolous complaints on the same matter and attempting to weaponize the Bureau of Elections for political gain.

#### **I. THE COMPLAINT IS BASED ON PREVIOUSLY RAISED ALLEGATIONS AND SHOULD BE SUMMARILY DISMISSED**

The Bureau of Elections previously considered and rejected the same allegations and arguments that Mr. LaBrant raises in his most recent Complaint. Under established Department of State policy, Mr. LaBrant’s successive and duplicative Complaint must be dismissed.

On July 31, 2020, and subsequently amended, Mr. LaBrant filed a nearly identical complaint against Respondent. In the original complaint and the amended complaint (collectively, the “August 2020 Complaint”), like here, Mr. LaBrant alleged that MCFR violated various

provisions of the MCFA because it made more than one contribution to Unlock Michigan and did not register as a “ballot question committee.” Following the August 2020 Complaint, MCFR submitted a detailed response on September 9, 2020, in which it outlined the multiple reasons why the complaint was factually and legally deficient. A copy of that response is attached at Exhibit 1. On October 1, 2020, Mr. LaBrant submitted a rebuttal to MCFR’s response.

On April 9, 2021, the Bureau of Elections informed Mr. LaBrant that “The Department of State (Department) has finished its investigation into the formal complaint you filed against Michigan Citizens for Fiscal Responsibility (MCFR) and the second complaint filed against Unlock Michigan (Unlock)....” (Exhibit 2). After conducting a lengthy and sound analysis regarding the allegations in Mr. LaBrant’s August 2020 complaint, the Department of State concluded that “the evidence is insufficient to conclude that a potential violation of the Act has occurred and dismisses your complaint.”

Apparently upset with this unsurprising result, Mr. LaBrant filed the instant Complaint that seeks to relitigate the issues he previously lost. Mr. LaBrant cannot do so pursuant to established Department of State policy. As set forth in the “Guidebook for Complainants and Respondents on the Campaign Finance Complaint Process,” complaints that are “successive” must be dismissed. Specifically:

If the Department receives multiple complaints which allege the same violation(s) against the same persons regarding the same evidence or activity, the Department may investigate only the first complaint filed and may dismiss any successive complaints. Upon the conclusion of the investigation, any complainant that filed a successive complaint that was summarily dismissed as duplicative will be notified of the resolution.<sup>2</sup>

Here, like the August 2020 Complaint, Mr. LaBrant alleges that MCFR or MMM violated the MCFA because it made improper contributions to Unlock Michigan. This successive Complaint should be dismissed. There are no new facts or allegations that would change this result.

Mr. LaBrant can overcome this fatal defect in his Complaint *only* by showing that the August 2020 Complaint is “distinct enough.” (See Guidebook at pg. 8). He cannot do so.

The non-distinct nature of the current Complaint is evidenced, in part, by its attack on the “credibility” of the affidavit submitted by MCFR President, Heather Lombardini in response to the August 2020 Complaint. This further supports the conclusion that Mr. LaBrant is attempting to relitigate his prior claim. There is no legitimate basis to attack an affidavit submitted in response to a prior complaint if the current Complaint is “distinct enough.” The current Complaint also refers to and relies on numerous alleged payments, facts and allegations that predate the August 2020 Complaint. There is nothing material in the most recent Complaint that was not or could not have been raised in the August 2020 Complaint. Moreover, Mr. LaBrant has had more than ample

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<sup>2</sup> [https://www.michigan.gov/documents/sos/Complaint\\_Guidebook\\_\\_Procedures\\_660411\\_7.pdf](https://www.michigan.gov/documents/sos/Complaint_Guidebook__Procedures_660411_7.pdf)  
at pg. 8

opportunity to raise his concerns in the original complaint, the amended complaint, rebuttals and apparently even a motion for reconsideration that was withdrawn.<sup>3</sup> Justice demands an end to this frivolous litigation. Pursuant to established Department policy, the current Complaint should be summarily dismissed.

## **II. THE COMPLAINT FAILS TO STATE A CLAIM OR SET FORTH ANY RELEVANT FACTS TO SUPPORT ONE**

While styled as a fanciful tale of dark money and alleged wrongdoing, the Complaint fails to clearly articulate what legal violation MCFR or MMM is accused of committing. This again highlights that the Complaint is frivolous and simply a regurgitation of alleged facts and conspiracy theories in search of a cause or a claim. Stated differently, the Complaint's repeated reference to alleged "coordination" between MCFR, Unlock Michigan and MMM is insufficient standing alone to avoid dismissal.

The Complaint presumably takes the same issue with MCFR's or MMM's activities that Mr. LaBrant raised in his August 2020 Complaint. That is, that the contributions made by MCFR or MMM to Unlock Michigan turn them into a "committee" under the MCFA. Once again, the Complaint cannot withstand scrutiny and should be dismissed.

The language of MCL 169.203(4) is plain and unambiguous. MCFR or MMM cannot, as a matter of law, be considered a "committee" under the MCFA unless it "solicits or receives contributions for the purpose of making an expenditure to that ballot question committee." There is no language in MCL 169.203 or the MCFA that prohibits a person from making multiple contributions to the same ballot question committee or that turns a person into a "committee" if it makes more than one contribution. There is also no prohibition against alleged "coordination" between organizations, so long as any "coordination" does not implicate a provision of the MCFA.

The *only* relevant question permitted by the MCFA that is applicable to this Complaint is whether MCFR or MMM solicited or received contributions for the purpose of making an expenditure to Unlock Michigan or any other ballot question committee. Notably, the Complaint does not allege that Respondents engaged in this activity. It simply claims that there is purported "coordination" between MCFR, Unlock Michigan, and MMM. Leaving aside this false and unsupported premise, the Complaint does not, and cannot, address the only relevant inquiry – whether MCFR or MMM solicited or received contributions *for the purpose* of making an expenditure to Unlock Michigan or any other ballot question committee.

Once again, and for the reasons stated in MCFR's September 9, 2021 response to Mr. LaBrant's August 2020 complaint, which are incorporated herein by reference, there are no facts

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<sup>3</sup> See e.g., *Lakewood Estates Improvement Association, Inc. v Bueker*, 2018 WL 3074592 (Mich Ct App June 21, 2018)(stating that "[t]he doctrine of res judicata is intended to relieve parties of the cost and vexation of multiple lawsuits, conserve judicial resources, and encourage reliance on adjudication, that is, to foster the finality of litigation." As such, "[o]ur Supreme Court 'has taken a broad approach to the doctrine of res judicata, holding that it bars not only claims already litigated, but also every claim arising from the same transaction that the parties, exercising reasonable diligence, could have raised but did not.'")

or evidence that MCFR or MMM solicited or received contributions *for the purpose* of making an expenditure to Unlock Michigan. The Complaint should be dismissed.

### **III. COMPLAINANT’S PROPOSED “REASON TO BELIEVE” STANDARD SHOULD BE REJECTED**

The Complaint tacitly acknowledges that there are no facts to support this partisan fishing expedition that Mr. LaBrant request that the Secretary undertake. Instead, the Complaint urges the application of a federally-based “reason to believe” standard that would allegedly authorize the Secretary to further investigate MCFR’s or MMM’ activities. It appears that this is an effort to circumvent the federal tax law protections on donor disclosure for social welfare organizations such as MCFR and MMM. The Secretary should reject his self-serving invitation.

As an initial matter, the federal “reason to believe” test is an internal administrative standard of the Federal Election Commission (“FEC”) that is used to assess whether an investigation is warranted. See *Guidebook for Complainants and Respondents on the FEC Enforcement Process* at pg. 12. If the FEC finds that there is “reason to believe,” it triggers “an investigation ... to determine whether a violation in fact occurred and, if so, the exact scope of the violation.” *Id.* This is akin to Rule 169.54, which simply authorizes the Secretary to notify the person against whom the allegation is made of the complaint. In other words, a reason to believe finding simply permits the Secretary to invite a response such as here. It does not, as Mr. LaBrant urges, serve as a basis to dig into MCFR’s or MMM’s confidential administrative matters.

The Complaint also fails even if the Secretary were to apply the FEC’s “reason to believe standard.” This standard requires a threshold showing that “*a violation may have occurred.*” (See Complaint at pg. 2). Here, the Complaint fails to clearly articulate or make the showing that a violation of the MCFA “may have occurred.” Indeed, for the reasons stated above, the Complaint does not set forth sufficient facts or legal claims to justify its conclusory determination that MCFR or MMM engaged in any violations of the law. The reason to believe standard should not save Mr. LaBrant’s defective Complaint.

### **IV. THE COMPLAINT’S ALLEGED “EVIDENCE” IS UNSUPPORTED, IRRELEVANT AND SHOULD BE REJECTED**

The Complaint seeks to overcome the absence of any actual facts or legally supported claims by setting forth unfounded allegations, unsupported conclusions, and affidavit statements made by those who lack personal knowledge and credibility.

The lynchpin that the Complaint relies on to try and avoid dismissal is Senate Majority Leader Mike Shirkey. To this end, the Complaint strenuously asserts that Senator Shirkey “controls” MCFR and MMM, along with Unlock Michigan. The Complaint does not allege any actual facts that this is the case.

Despite all of the flame-throwing and bombastic accusations lodged by Mr. LaBrant and Mr. Timmer against MCFR, Unlock Michigan and MMM, there is a notable omission from their affidavits. Not once do they claim or set forth any actual facts that Senator Shirkey controls or

coordinates MCFR, Unlock Michigan and MMM. The fact that Mr. LaBrant makes these accusations in a Complaint but refuses to make the same statements under penalty of perjury is telling and should be seen as dispositive.

The Complaint and supporting affidavits also fail to support the claimed legal violations. In Section III of the Complaint, Mr. LaBrant relies on the fact that Mr. Timmer was previously affiliated with Lansing-based Sterling Corporation. The Complaint notes that Sterling did work for the Senate GOP between 2000 and 2010. It also relies on the affidavit of Mr. LaBrant, which notes that when he was involved with Sterling from 2015 to 2017, some Sterling employees were also directors of MCFR. Simply put, there are no present-day facts that support a violation of the law. If anything, the history of MCFR and MMM establish that they have and do participate in many endeavors and are not controlled by any one individual or organization.

It strains credulity that the Complaint attempts to attack the credibility of Ms. Lombardini's affidavit while relying on affidavits of Mr. LaBrant and Mr. Timmer. As an initial matter, the LaBrant and Timmer affidavits fail to set forth any relevant facts based on their own personal knowledge. Mr. Timmer's affidavit speaks to activities and affiliations from 2010 to 2014. LaBrant's affidavit admits that his affiliation with Sterling and MCFR ended in 2017. They have no personal knowledge regarding the claims set forth in the Complaint. Permitting their vague, outdated and speculative comments to result in additional investigation sets a dangerous and troubling precedent.

Mr. LaBrant has made no secret of the fact that he has a personal vendetta against MCFR, MMM and other conservative causes. Over the past several years, Mr. LaBrant has routinely attacked republicans with whom he disagrees and has teamed up with Mr. Brewer to target Senate Majority Leader Shirkey.<sup>4</sup> Mr. LaBrant's affidavit, to the extent it includes anything beyond hearsay, conclusory statements, and unfounded accusations, should be rejected.

Mr. Timmer's affidavit is also troubling. Through his affiliation with the Lincoln Project, Mr. Timmer boasts that it is a "a burn-it-down, Molotov cocktail-throwing army." This included trying to "bruise Trump every day and get him off message."<sup>5</sup> Mr. Timmer has also threatened "consequences" against republican legislators who do not work, in his opinion, in a bipartisan manner on election reform. On April 16, 2021, Mr. Timmer tweeted the following:

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<sup>4</sup> See e.g., <https://www.freep.com/story/opinion/contributors/2021/05/20/political-rivals-ask-probe-gop-dark-money/5161347001/>

<sup>5</sup> See, <https://www.freep.com/story/news/politics/elections/2020/07/10/lincoln-project-former-republicans-anti-donald-trump/5397129002/>



There can be no genuine dispute that Mr. LaBrant and Mr. Timmer have an agenda against MCFR, MMM and other conservative causes, and have made it their mission to target them at all costs. Regardless of the reason for these behaviors, they should not be permitted to use the Secretary and legal system to do their bidding. Indeed, there is no basis in the law or Department regulations that allows them to do so.

For these reasons, the Complaint's alleged "facts" do not amount to direct evidence, circumstantial evidence, or a reasonable inference of a legal violation. At bottom, the Complaint again fails to articulate any facts (or even argue) that MCFR or MMM solicited or received contributions *for the purpose* of making an expenditure to Unlock Michigan.

As discussed above and in MCFR's September 9, 2020 response to Mr. LaBrant's August 2020 Complaint against MCFR, there are numerous factual and legal flaws in the Complaint's allegations that should result in its dismissal. Aside from these dispositive factors, urging the Secretary to adopt and apply a distinguishable and relaxed evidentiary standard to pry into the internal affairs of a non-profit organization is troubling and will create a slippery slope for all politically-focused organizations. The Complaint should be dismissed.

Thank you for your consideration of our comments in this matter. Please contact us if you have any questions or require additional information.

Sincerely,

CLARK HILL

*Brian D. Shekell*

Brian D. Shekell

*Andrew C. Richner*

Andrew C. Richner

Brian D. Shekell  
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September 9, 2020

Adam Fracassi  
Bureau of Elections  
Michigan Department of State  
430 W. Allegan, First Floor  
Lansing, MI 48918

***Re: Response of Michigan Citizens for Fiscal Responsibility to Complaint filed by  
Robert S. LaBrant***

Dear Mr. Fracassi:

This office represents Michigan Citizens for Fiscal Responsibility (the “Respondent”) in the above-referenced matter. On August 20, 2020, we received a copy of your letter dated August 14, 2020 and the August 3, 2020 Complaint, as amended on August 9, 2020 (the “Complaint”), that was submitted by Robert S. LaBrant. Please allow this letter to serve as Respondent’s response to the Complaint and a request that it be dismissed.

The Complaint alleges that Respondent became a “ballot question committee” under the Michigan Campaign Finance Act (the “MCFA”), because it made more than one contribution to Unlock Michigan, a registered ballot question committee in the State of Michigan. There is no legal, precedential, or common-sense support for the Complaint’s fanciful assertions.

The relief requested in the Complaint requires Secretary of State Jocelyn Benson (“Secretary Benson”) to act contrary to established Michigan law. That is, the Complaint urges Secretary Benson to disregard the plain language of MCL 169.203(4), which mandates that a person making an expenditure “shall not” be “considered a committee” under the MCFA “unless the person solicits or receives contributions for the purpose of making an expenditure to that ballot question committee.”

Applying the correct legal standard that is set forth in MCL 169.203, the Complaint is not, and cannot be, supported by any evidence that Respondent has solicited or received contributions for the purpose of making an expenditure to Unlock Michigan. The absence of any such evidence is dispositive and must result in dismissal of the Complaint.

The Complaint attempts to overcome this fatal defect by asserting that Secretary Benson should unilaterally promulgate and apply a “rebuttable presumption standard.” This argument too is devoid of any supporting legal authority and impermissibly shifts the burden to Respondent to prove a negative. In fact, it is at direct odds with the clear and unambiguous text of the MCFA.

Simply put, the Complaint is without a scintilla of factual or legal support. It urges Secretary Benson to ignore the law she is duty bound to adhere to and apply a rule that Mr. LaBrant, a private citizen, contrived on his own. For these reasons, and as described in more detail below, the Complaint should be dismissed.

#### **I. THE PLAIN AND UNAMBIGUOUS TEXT OF THE MCFA REQUIRES DISMISSAL OF THE COMPLAINT**

The Complaint asserts that Respondent is a “committee” under the MCFA simply because it made more than one contribution to a ballot question committee. However, this unfounded and conclusory claim is contrary to what the MCFA requires in order for a “person” to be deemed a “committee.” MCL 169.203(4) states:

A person, other than a committee registered under this act, making an expenditure to a ballot question committee or an independent expenditure committee, shall not, for that reason, be considered a committee or be required to file a report for the purposes of this act unless the person solicits or receives contributions for the purpose of making an expenditure to that ballot question committee or independent expenditure committee. (Emphasis added)

The language of MCL 169.203(4) is plain and unambiguous. Respondent cannot, as a matter of law, be considered a “committee” under the MCFA unless it “solicits or receives contributions for the purpose of making an expenditure to that ballot question committee.” There is no language in MCL 169.203 or the MCFA that prohibits a person from making multiple contributions to the same ballot question committee or that turns a person into a “committee” if it makes more than one contribution. Stated differently, it is irrelevant whether Respondent made 1, 2, 10 or 100 contributions to Unlock Michigan.

The *only* relevant question permitted by the MCFA is whether Respondent solicited or received contributions for the purpose of making an expenditure to Unlock Michigan or any other ballot question committee. The answer to this question is simple, straightforward, and fatal to the Complaint’s allegations – Michigan Citizens for Fiscal Responsibility did not solicit or receive contributions *for the purpose* of making an expenditure to Unlock Michigan or any other ballot question committee. (Exhibit 1, Affidavit of Heather Lombardini). The Complaint does not, and cannot, assert otherwise.

The uncontroverted affidavit of Heather Lombardini, President of Respondent, is dispositive. There is no evidence that Respondent solicited or received contributions *for the purpose* of making an expenditure to Unlock Michigan. The allegations in the Complaint are

without factual support and should result in its dismissal. *See* Interpretative Statement issued to Constance Cumbey dated December 28, 1979 (noting that the Michigan Department of State is bound to enforce the MCFA's limitations as written).

## **II. THE COMPLAINT'S "REBUTTABLE PRESUMPTION" THEORY SHOULD BE DISREGARDED**

The Complaint attempts to circumvent the unambiguous text of the MCFA by advocating for the application of a "rebuttable presumption." It argues that Secretary Benson should apply a rebuttable presumption that a person is deemed a committee under the MCFA if it makes multiple contributions to a ballot question committee. This rebuttable presumption theory is without any legal support, is at direct odds with the plain text of MCL 169.203 and urges Secretary Benson to improperly circumvent the legislative process by applying a new and different legal standard.

### **A. There is no legal support for a rebuttable presumption**

It is evident when reading the Complaint that Mr. LaBrant's advocacy for a rebuttable presumption is without legal support. Indeed, Mr. LaBrant espouses the need for Secretary Benson to apply a rebuttable presumption without a single citation or reference to any legal authority. This is because there is no such authority.

Nowhere is this "rebuttable presumption" theory discussed in the MCFA, the MCFA's administrative rules, cases, Attorney General opinions, declaratory rulings, interpretative statements, or any other authority.

Secretary Benson should reject the Complaint's request to apply a rebuttal presumption in this case given the absence of any legal support to support its adoption and application.

### **B. A rebuttable presumption ignores the plain text of the MCFA**

The "rebuttable presumption" theory should also be disregarded because it ignores the requirement in the MCFA that a person must solicit or receive contributions for "the" purpose of making an expenditure to that ballot question committee. See MCL 169.203(4). Not "a" purpose, but "the" purpose. As recognized by the Michigan Supreme Court:

"The" and "a" have different meanings. "The" is defined as "definite article. 1. (used, [especially] before a noun, with a specifying or particularizing effect, as opposed to the indefinite or generalizing force of the indefinite article a or an) ...." *Random House Webster's College Dictionary*, p. 1382.

\* \* \*

"We must follow these distinctions between "a" and "the" because the Legislature has directed that "[a]ll words and phrases shall be construed and understood according to the common and approved

usage of the language....” MCL 8.3a. See, e.g., *Detroit v. Tygard*, 381 Mich. 271, 275, 161 N.W.2d 1 (1968) (“We regard the use of the definite article ‘the’ as significant.”)

*Robinson v. City of Detroit*, 486 Mich 1, 14 (2010).

Even if one of the bases upon which Respondent solicited contributions was so that it could make an expenditure to Unlock Michigan, which it was not, the MCFA requires a showing that Respondent’s solicitation of such contributions was *the* reason. There is simply no evidence that Respondent has engaged in such activity. See Affidavit of Heather Lombardini.

The fallacy in the rebuttable presumption theory is further underscored by the fact that it seeks to introduce concepts such as cash flow and multiple contributions, which necessarily fall outside “the” purpose that is required by the MCFA. See *Robinson, supra*. The rebuttable presumption theory is contrary to the text of the MCFA.<sup>1</sup>

**C. The Legislature could have required a rebuttal presumption when it passed the MCFA, but did not do so**

Had the Legislature wanted to permit Secretary Benson to apply a rebuttable presumption in this type of case, it would have expressly provided for such in the MCFA. See *Potter v. McLeary*, 484 Mich. 397, 422 n. 30, (2009) (observing that “[i]f the Legislature wanted such a requirement, it could have easily included it”).

The concept of a rebuttable presumption is not new, nor has it been lost on the Legislature. There have been multiple laws passed by the Legislature that expressly called for rebuttable presumptions to be applied in certain circumstances. See e.g., MCL 780.951 (providing for a “Presumption Regarding Self-Defense”); MCL 600.2946 (“In a product liability action brought against a manufacturer or seller for harm allegedly caused by a product, there is a *rebuttable presumption* that the manufacturer or seller is not liable if, at the time the specific unit of the product was sold or delivered to the initial purchaser or user...”)(emphasis added); MCL 710.33(2) (“Such a notice shall create a *rebuttable presumption* as to paternity of the child for purposes of dependency or neglect proceedings under chapter 12a.”)(emphasis added); MCL 206.667 (The apportionment provisions of this part shall be *rebuttably presumed* to fairly represent the business activity attributed to the taxpayer in this state...”)(emphasis added).

The fact that the Legislature could have, but did not, adopt the rebuttable presumption Mr. LaBrant advocates for in this matter is further evidence that his theory is without merit. Simply put, the MCFA does not authorize Secretary Benson to apply Mr. LaBrant’s rebuttable presumption theory in this case or in any other case. While Mr. LaBrant may not personally agree

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<sup>1</sup> Aside from being contrary to the text of the MCFA, the Complaint’s “rebuttable presumption” theory ignores the dangers of creating presumptions in general. It is a time-honored principle that presumptions are like “bats of the law, flitting in the twilight, but disappearing in the sunshine of actual facts.” See *Mackowik v. Kansas City, St. J. & C.B. R.R.*, 94 S.W. 256, 262 (Mo. 1906).

with what MCL 169.203 requires, it is not the role of Secretary Benson to shirk her constitutional and legal obligations to enforce the MCFA as written.

**D. Applying a rebuttable presumption would eviscerate MCL 169.203**

Mr. LaBrant's rebuttable presumption theory is also contrary to the express presumption in MCL 169.203 that a person is not a committee.

The statutory presumption in favor of a person *not* being deemed a committee can only be rebutted by a showing that a person solicited or received contributions for the purpose of making an expenditure to a ballot question committee. Mr. LaBrant's theory, however, turns MCL 169.203(4) on its head by reversing the statutory presumption that a person is not a committee. Stated differently, Mr. LaBrant advocates that Secretary Benson disregard the entire legislative process and unilaterally amend the MCFA by substituting his presumption for what the duly enacted law currently requires. *See Martin v. Secretary of State*, 482 Mich. 956 (2008) ("it is not 'manifestly unjust' for this Court to conclude that the plain words of a law enacted by the Legislature cannot be modified by a clerk in the Secretary of State's office (or indeed by the Secretary of State herself).") (Markman, concurring). *See also South Dearborn Environmental Improvement Ass'n, Inc. v. Dep't of Environmental Quality*, 502 Mich. 349, 360 (2018) (when interpreting a statute, the principal goal "is to give effect to the Legislature's intent, and the most reliable evidence of that intent is the plain language of the statute")(opinion by Bernstein); *In re Rovas Complaint*, 482 Mich. 90, 108 (2008) (an administrative agency's interpretation of a statute that it is obligated to execute "cannot conflict with the plain meaning of the statute"). The Complaint's rebuttable presumption theory is without legal support and, in fact, is at direct odds with the plain text of the MCFA and longstanding principles of statutory construction. Secretary Benson should reject Mr. LaBrant's attempt to circumvent the legislative process and unilaterally promulgate his own law.

**E. Mr. LaBrant's public statements regarding this matter, when compared to the undisputed facts, further supports dismissal of the Complaint.**

Even if Mr. LaBrant's rebuttable presumption theory had a shred of legal support, which it does not, Mr. LaBrant's public statements confirm that Respondent has sufficiently rebutted that presumption.

In an August 24, 2020 article published by The Ballenger Report titled *Why LaBrant Filed Complaint Against 'Unlock Michigan' Funding*, Mr. LaBrant provides an "exclusive statement" regarding the allegations upon which his Complaint is based and the reasoning for his contrived theories.<sup>2</sup>

Among Mr. LaBrant's statements in The Ballenger Report article is his recognition that if Respondent had a sufficient level of funds in its bank account prior to making contributions to Unlock Michigan, then it has sufficiently rebutted the "presumption" that Respondent's

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<sup>2</sup> <https://www.theballengerreport.com/why-labrant-filed-complaint-against-unlock-michigan-funding/>

expenditures result in its being a committee under the MCFA. Indeed, this makes sense because Respondent would not need to solicit funds for Unlock Michigan if it already had the funds in the first place. Specifically, Mr. LaBrant states:

In my complaint, I stated that the second contribution by MCFR to Unlock Michigan raises the presumption that during the nine days between their first contribution (\$10,000) on June 9, and the second contribution (\$150,000) to Unlock Michigan on June 18, MCFR was doing precisely what that phrase — “unless the person solicits or receives contributions for the purpose of making an expenditure to that ballot question committee” — says disqualifies MCFR from being exempt from definition of “committee.” That presumption, of course, can be rebutted. It is conceivable that MCFR had \$160,000 in its bank account on June 9, 2020 and that MCFR was not out soliciting and receiving contributions to make that second contribution of \$150,000 to Unlock Michigan on June 18. (Emphasis added).

As detailed in the affidavit of Ms. Lombardi, the Form 990 that Respondent intends to submit will show that Respondent had a bank account balance of over \$700,000 as of December 31, 2019. (Ex. 1) This is far above the amount of the expenditures made to Unlock Michigan in 2020 dispelling the need to solicit funds for the purpose of making an expenditure to Unlock Michigan. This undisputed fact, in Mr. LaBrant’s view, adequately rebuts the presumption that Respondent was soliciting funds for the “purpose of making an expenditure to that ballot question committee” because it always had a bank account balance in excess of any expenditure made to Unlock Michigan.

Even if Secretary Benson were to apply Mr. LaBrant’s rebuttable presumption theory, which she should not, Respondent has rebutted the presumption that it acted as a committee by providing evidence of its financial resources above the amount of the expenditures made to Unlock Michigan. This too should result in dismissal of the Complaint.

### **III. SECRETARY BENSON SHOULD DISREGARD THE COMPLAINT’S EXAMPLES AND RELIANCE ON AN INAPPLICABLE CASE FROM 2014**

In tacit acknowledgment that there is no support for the indefensible positions asserted in the Complaint, Mr. LaBrant sets forth strained applications of a distinguishable past case and illusory hypotheticals. His reliance on this case and hypotheticals should be ignored.

#### **A. The 2014 MCEF matter is inapposite**

The Complaint seeks to utilize the 2014 Michigan Community Education Fund (“MCEF”) matter as “precedent” to support its otherwise meritless positions. The MCEF case has no application to this case.

The Department of State's inquiry into MCEF's expenditures was based on Detroit Forward *not* being registered as a ballot question committee under the MCFA. In its April 9, 2014 letter, the Department of State stated:

"Although not relevant to this disposition of this complaint, the Act provides a safe harbor for persons who make contributions to ballot question committees: "A person, other than a committee registered under this Act, making an expenditure to a ballot question committee, shall not, for that reason, be considered a committee for the purposes of this Act unless the person solicits or receives contributions for the purpose of making an expenditure to a ballot question committee." MCL 169.203(4). Thus, a corporation that contributes to a ballot question committee is not subject to the Act's registration and reporting requirements unless the corporation solicits or receives contributions from other sources for the purpose of making an expenditure to a ballot question committee. Because Detroit Forward is not a ballot question committee, MCEF cannot avoid registering as a committee on the basis that it did not solicit or receive money for the express purpose of making an expenditure to Detroit Forward." (Emphasis added).

The fact that Detroit Forward was not considered a "ballot question committee" is critically material for purposes of this analysis. Under MCL 169.203(4), it is presumed that a person is not a committee if they make contributions to a "ballot question committee." Detroit Forward was not a ballot question committee, which meant that the presumption and showing of proof that is required here did not apply.

Here, there is no dispute that Unlock Michigan is duly registered as a ballot question committee in Michigan. This requires the presumption that Respondent is not a committee under the MCFA. Given the absence of any evidence to the contrary, the Complaint should be dismissed.

Even if the legal principles at issue in MCEF were applicable here, which they are not, the facts of the MCEF case are wholly distinguishable from the facts Mr. LaBrant complains of here.

In MCEF, Detroit Forward was formed as an independent expenditure PAC on April 17, 2013, and listed Christopher T. Jackson as its Treasurer. Just five months later, on September 26, 2013, Jackson filed Articles of Incorporation with the State on behalf of MCEF. MCEF's Articles of Incorporation listed Jackson as the sole member of the MCEF's Board of Directors. Within a month of being created, MCEF received \$179,050 in contributions and made \$149,000 in expenditures to Detroit Forward.

In response to a campaign finance complaint submitted to the Department of State, Mr. Jackson stated that he discussed with potential donors to MCEF the "potential permissible and limited political activities of MCEF[.]" and that "MCEF could engage in direct advocacy for or against a candidate or provide financial support to other groups engaging in direct candidate advocacy."

In its April 9, 2014 letter detailing the results from its investigation, the Department of State noted that Jackson held “unique interlocking positions” with MCEF and Detroit Forward, and had “knowledge of Detroit Forward’s needs.” Additionally, “[b]ecause MCEF used contributions in accordance with Mr. Jackson’s statements to contributors that MCEF may use its funds to provide financial support to groups engaging in direct candidate advocacy, MCEF must disclose the original source of funds solicited. The Department of State went on to state:

As the sole incorporator of MCEF and treasurer of Detroit Forward, Mr. Jackson was keenly aware of both organizations’ financial positions and could quickly direct substantial contributions from MCEF to Detroit Forward. During his pivotal period, Mr. Jackson transferred over 80% of all funds obtained by MCEF from the time of its inception until Election Day (\$179,050.00). Thus, it appears that MCEF’s original, primary purpose, was to shield the names of contributors to Detroit Forward from public disclosure, not fund a coordinated education campaign on voter registration and participation. In essence, by having donors contribute to MCEF and then transferring the contributions to Detroit Forward, Mr. Jackson orchestrated MCEF’s effort to thwart the disclosure purpose of the Act.

As discussed above, the facts of this case are irrelevant because, unlike Unlock Michigan, Detroit Forward was not a ballot question committee. This resulted in a different consideration of the facts than is required here.

Nevertheless, the obvious self-dealing by Jackson in his dual-roles with Detroit Forward and MCEF is completely inapposite to the facts here. Respondent has been in existence since 2010 and has been and continues to be involved with numerous different causes since that time. Moreover, there are no officers of the Respondent who are officers of Unlock Michigan; nor were there any statements made to contributors by the Respondent akin to those made by MCEF’s representatives. As discussed above, Respondent has consistently maintained bank account levels significantly higher than the amounts of expenditures it made to Unlock Michigan. This is far different than MCEF, where Jackson created the organization just months after Detroit Forward was created, funneled nearly all of its contributions to Detroit Forward, and had a dual role in the two organizations leadership.

The MCEF matter that the Complaint relies on is legally and factually inapposite to the facts here. Mr. LaBrant’s reliance on that case should be rejected.

**B. The Complaint's hypotheticals highlight the need to disregard the rebuttable presumption theory**

Mr. LaBrant's attempt to illustrate his rebuttable presumption theory is not only a fictional exercise of an active imagination, it represents the danger of straying from the text of the MCFA. Indeed, the fallacy in Mr. LaBrant's example is evident given his explanation that the first contribution does not trigger "committee" status under the MCFA. In his August 9, 2020 amendment to Section 3 of the Complaint, Mr. LaBrant states as follows:

"MCFR'S first contribution on June 9 to Unlock Michigan was for \$10,000; everyone agrees a one-time contribution under Sec. 3(4) does not trigger any registration or reporting requirement."

This makes no sense and is unsupported by the plain text of MCL 169.203. If a person "solicits or receives contributions *for the purpose* of making an expenditure to that ballot question committee," it makes no legal difference if it is the person's first, second, third or tenth contribution to a ballot question committee. This is the danger of straying from the text of the MCFA.

The Complaint's use of General Motors as an example of how to rebut Mr. LaBrant's rebuttable presumption theory is illustrative of yet another fatal flaw in its application. By claiming that "cash flow is the only factor," how would this theory have applied during the General Motors bankruptcy in 2009 where GM perhaps lacked "millions of dollars in its corporate treasury?" Under the rebuttable presumption theory, GM would be a ballot question committee not because it "solicits or receives contributions for the purpose of making an expenditure to that ballot question committee" (as required by the MCFA), but because of how much was in its bank account. This is nonsensical and underscores the practical dangers of straying from the plain text of the MCFA.

**IV. THE COMPLAINT IS NOT SUPPORTED BY FACTUAL EVIDENCE**

Section 15(5)(c) of the MCFA requires that the complaint be "supported by evidence" or that "the identified factual contentions are likely to be supported by evidence after a reasonable opportunity for further inquiry." The only facts identified by the LaBrant Complaint are the number and amount of contributions made by the Respondent to Unlock Michigan. But these facts do not support the argument that the Respondent is a ballot question committee. As discussed above, the statute requires registration as a ballot question committee only if the organization "solicits or receives contributions for the purpose of making an expenditure to that ballot question committee." The number and amount of the contributions has no relevance to whether the organization has solicited or received contributions for the purposes of making an expenditure to a ballot question committee.

Mr. LaBrant himself has stated that the total amount of the contributions is irrelevant:

Had MCFR written only one check for \$695,200 on June 9, 2020, that would be a legal contribution to a ballot question committee.

Section 3(4) would be crystal clear — MCFR would not have to register and report itself as a ballot question committee, because it did not go on to solicit and receive contributions. I would not have filed a campaign finance complaint. *Why LaBrant Filed Complaint Against 'Unlock Michigan' Funding*, The Ballenger Report, August 24, 2020.

So, Mr. LaBrant only offers the fact that there were multiple contributions and not a single contribution to support his theories.

This is not evidentiary support for a violation of the MCFA's ballot committee registration requirements that the Secretary of State and the Bureau of Elections have ever recognized. This is despite the fact that there are years of precedent where countless ballot proposal committees have accepted multiple contributions from donor organizations that have not registered as ballot question committees themselves. As a recent example, a group, Bipartisan Solutions, claiming tax-exempt status under Section 501(c)(4) of the Internal Revenue Code, has made four direct contributions since January 2020 to the ballot question committee Fair and Equal Michigan in the total amount of \$706,000. If the Respondent's contributions are problematic, surely Bipartisan Solutions' contributions would be as well. Undoubtedly, an adverse ruling in this case would lead to a flurry of campaign finance complaints against similar organizations.

As discussed above, there are numerous factual and legal flaws in the Complaint's allegations that should result in its dismissal. Aside from these dispositive factors, the practical implications of Mr. LaBrant's claims cannot be ignored. By disregarding the plain text of the MCFA, those individuals and organizations who have made contributions based on what the law requires will be irreparably harmed. If the Secretary of State and the Bureau of Elections wish to change the law on such issues, the LaBrant Complaint is not the appropriate means to do so.

Thank you for your consideration of our comments in this matter. Please contact us if you have any questions or require additional information.

Sincerely,

CLARK HILL PLC

*Brian D. Shekell*

Brian D. Shekell

*Andrew C. Richner*

Andrew C. Richner

cc: Heather Lombardini, President  
(Michigan Citizens for Fiscal Responsibility)

# EXHIBIT 1

AFFIDAVIT OF HEATHER LOMBARDINI

STATE OF MICHIGAN     )  
                                      )ss  
COUNTY OF INGHAM     )

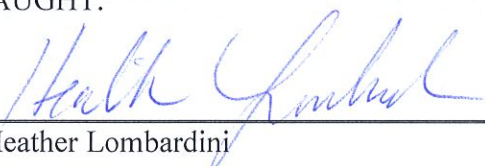
Heather Lombardini, being first duly sworn, deposes and states as follows:

1. I am the President for Michigan Citizens for Fiscal Responsibility ("MCFR"). I have held this role since 2019.
2. MCFR was formed in 2010. Since this time, MCFR has engaged in promoting the common good and general welfare of the public by advocating for fiscal responsibly at the state and federal levels of governments, as provided in its Articles of Incorporation and Section 501(c)(4) of the Internal Revenue Code.
3. As the President of MCFR, my duties and responsibilities include general and active management of the activities of the Corporation, as well as fundraising. Additionally, I am aware of the requirements under the Michigan Campaign Finance Act ("MCFA"), and specifically MCL 169.203(4), that a "person" shall not be considered a "committee" under the MCFA, "unless that person solicits or receives contributions for the purpose of making an expenditure to that ballot question committee or independent expenditure committee."
4. In my role as President, I have personal knowledge as to: (1) how MCFR solicits and receives contributions; (2) the contributions made to MCFR in 2019 and 2020; and (3) expenditures made by MCFR to third-parties in 2020.
5. While MCFR has not yet submitted its Form 990 for the 2019 calendar year, when it does so, it will show that as of December 31, 2019, MCFR had a bank account balance of over \$700,000. Because of this, MCFR has never had the need to solicit funds for the purpose of making an expenditure to Unlock Michigan.

6. To the best of my knowledge, MCFR has not solicited or received contributions for the purpose of making an expenditure to Unlock Michigan or any other ballot question committee.

7. It is my belief that MCFR has complied with the requirements of the MCFA. This includes making expenditures to Unlock Michigan as a "person," and not having engaged in actions that would result in MCFR being classified as a "committee" under the MCFA.

FURTHER DEPONENT SAYETH NAUGHT.

  
Heather Lombardini

Subscribed and sworn to before me  
this 9<sup>th</sup> day of September, 2020.

\_\_\_\_\_



STATE OF MICHIGAN  
JOCELYN BENSON, SECRETARY OF STATE  
DEPARTMENT OF STATE  
LANSING

April 9, 2021

Bob LaBrant  
12422 Pine Ridge Drive  
Perry, MI 48872

*Via Email*

Dear Mr. LaBrant:

The Department of State (Department) has finished its investigation into the formal complaint you filed against Michigan Citizens for Fiscal Responsibility (MCFR) and the second complaint filed against Unlock Michigan (Unlock), alleging that violations of the Michigan Campaign Finance Act (MCFA or Act), 1976 PA 388, MCL 169.201 *et seq.* In separate correspondence, the Department notified you that the complaints were being merged together for the purpose of administrative efficiency.<sup>1</sup> This letter concerns the resolution of both complaints.

Unlock is a registered ballot question committee with the Department<sup>2</sup> and has filed an initiative petition seeking the repeal of the Emergency Powers of Governor Act, 1945 PA 301, MCL 10.31 *et seq.* Unlock has filed its July Quarterly campaign finance statements and disclosed a total of \$765,024 in contributions received, including \$660,200 from MCFR alone. MCFR is registered as a 501(c)(4) with the Internal Revenue Service (IRS), but not as a ballot question committee under the MCFA. These facts are not in dispute.

You argue that since MCFR has met the definition of committee because it has solicited contributions for the purpose of making expenditures to Unlock and should be required to form and register as a committee. Specifically, you state that the following five contributions mandate MCFR's registration:

Date	Amount
\$10,000	June 9, 2020
\$150,000	June 18, 2020
\$400,000	June 24, 2020
\$200	June 30, 2020

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<sup>1</sup> See, e.g., *Michigan Waste Systems, Inc v Dep't of Natural Resources*, 157 Mich App 746, 756 (1987) ("The purpose of consolidation is to promote the convenient administration of justice and to avoid needless duplication of time, effort, and expense.") (Internal quotations omitted.)

<sup>2</sup> Committee ID No. 519796.

\$100,000      July 20, 2020

You allege these contributions were made to MCFR and earmarked for Unlock and that MCFR made multiple contributions to Unlock. Because of this, you argue MCFR is obligated to register as a committee with the Department. You next allege that since the contributions were earmarked, Unlock would also be obligated to disclose the source of the contributions given to MCFR. By failing to do so, you allege Unlock has violated the Act's disclosure provisions.

Unlock and MCFR responded by letters dated November 2, 2020 and September 9, 2020 respectively. They argued there was no evidence that contributions were solicited by MCFR on behalf of Unlock and that MCFR was not an agent of Unlock. Further, they argued that MCFR was formed in 2010 and MCFR does not share common officers, such as a treasurer or director, with Unlock. Unlock further argued that it did not violate the Act since it properly reported all contributions received from MCFR.

The threshold issue in this complaint is whether MCFR meets the definition of "committee" thereby mandating registration obligations with the Department. If MCFR does not meet the Act's definition of "committee," then no registration requirements for MCFR have arisen, and contributions to Unlock have been properly reported. The Department turns to this first issue.

Committee is defined as a "person that receives contributions or makes expenditures for the purpose of influencing or attempting to influence the action of the voters for or against the nomination or election of a candidate, the qualification, passage, or defeat of a ballot question, or the qualification of a new political party, if contributions received total \$500.00 or more in a calendar year or expenditures made total \$500.00 or more in a calendar year." MCL 169.203(4). However, the Act specifically exempts committee registration "*unless* the person solicits or receives contributions of the purpose of making an expenditure to that ballot question committee." *Id.*, (Emphasis added).

In interpreting a statute, the goal is to "ascertain and give effect to the intent of the Legislature." *People v Gardner*, 482 Mich 41, 50 (2008), *quoting People v Pasha*, 466 Mich 378, 382. "To do so, we begin with the language of the statute, ascertaining the intent that may reasonably be inferred from its language. When the language of a statute is unambiguous, the Legislature's intent is clear and judicial construction is neither necessary nor permitted." *Odom v Wayne County*, 482 Mich 459, 467 (2008), *quoting Lash v Traverse City*, 479 Mich 180, 187 (2007).

The Act's definition is clear and unambiguous in its requirement that contributions be solicited for the purpose of making an expenditure to that ballot question committee. Stated differently, MCFR is not obligated to register as a committee and file reports unless the evidence shows that MCFR solicited or received contributions *for the purpose of making an expenditure* to Unlock.

In support of your complaint, you cite the Department's prior enforcement action in *D'Assandro v. Home Care First, Inc* (HCFI). There, the allegation was that HCFI (an unregistered committee) solicited contributions for the sole purpose of making expenditures to Citizens for Affordable Quality Home Care (Citizens), a registered ballot question committee. In finding a violation, the Department concluded the following:

- A principal activity for HCFI was to provide financial support to Citizens.
- HCFI's articles of incorporation appointed three members to its Board of Directors. The next day following incorporation, Citizens formed its ballot question committee listing the same address as the registered office of HCFI and Citizens mailing address.
- One of HCFI's directors simultaneously served as the treasurer of Citizens. This is evidence of coordination in that it enabled him to know when Citizens would require money for its ballot proposal and when HCFI would be providing money.
- Between March 2012 and November 2012, with the exception of one contribution, HCFI was the *sole* contributor to Citizens.
- A third ballot question committee was formed by SEIU International who reported making contributions directly to *Citizens* while the contributions were being solicited and reported by HCFI.
- Contributions made by SEIU were deposited into HCFI's bank account and the *exact* amount was later transferred to Citizens' account within days.
- HCFI transferred *more money* to citizens than it had available in its account.

See *D'Assandro v. HCFI*, available at:

[https://www.michigan.gov/documents/sos/DAssandro\\_v\\_Home\\_Care\\_and\\_Citizens\\_CA\\_cover\\_letter\\_and\\_Conciliation\\_Agreement\\_449955\\_7.pdf](https://www.michigan.gov/documents/sos/DAssandro_v_Home_Care_and_Citizens_CA_cover_letter_and_Conciliation_Agreement_449955_7.pdf). Ultimately, the Department concluded that the evidence demonstrated an arrangement was made between HCFI and Citizens because the groups were formed within one day of the other, they had the same officers, the contributions were commingled between the two groups, and the exchange of money between the two groups clearly demonstrated that contributions were being solicited by HCFI on behalf of Citizens.

You similarly rely upon an enforcement action conducted in *Turnaround Detroit v. Detroit Forward*. In *Detroit Forward*, the Department concluded that it had reason to believe violations of the Act had occurred when Michigan Community Education Fund (MCEF), a registered 501(c)(4), made certain contributions to Detroit Forward, an independent expenditure committee. Mr. Christopher Jackson was the treasurer of Detroit Forward and the sole director of MCEF. The Department concluded the following:

After reviewing Detroit Forward's campaign finance statements, the Department notes that on October 21, 2013 – the same day MCEF received a \$100,000 contribution – Detroit Forward's cash-on-hand was \$32,818.68. Mr. Jackson then proceeded to make \$68,308.75 in expenditures from Detroit Forward over the next 5 days, leaving Detroit Forward with a negative balance in the amount of \$35,490.07 on October 26, 2013. Mr. Jackson then transferred \$85,000 from MCEF to Detroit Forward on October 28, 2013. It appears to the Department that due to Mr. Jackson's unique interlocking positions with both MCEF and Detroit Forward, and his knowledge of Detroit Forward's needs, although Mr. Jackson originally deposited the October 21, 2013 \$100,000 contribution in MCEF's account, he treated that money as Detroit Forward's funds and made expenditures of those funds from Detroit Forward almost immediately and before the transfer.

*Turnaround Detroit v. Detroit Forward*,

[https://www.michigan.gov/documents/sos/Turnaround\\_Detroit\\_V\\_Detroit\\_Forward\\_and\\_MCEF\\_pt\\_2\\_455985\\_7.pdf](https://www.michigan.gov/documents/sos/Turnaround_Detroit_V_Detroit_Forward_and_MCEF_pt_2_455985_7.pdf). The Department further concluded that it appeared "MCEF's original,

primary purpose was to shield the names of contributors to Detroit Forward from public disclosure” by having donors contribute to MCEF and then transferring the contributions to Detroit Forward. *Id.* Thus, the Department concluded that a violation had occurred.

In the present complaints, you have you have argued the Department to follow the same course of action it took in *HCFI* and *Detroit Forward*, but the facts simply do not support such a proposed course. In *HCFI* and *Detroit Forward*, the Department concluded that the evidence showed the contributions were solicited solely for the purpose of being given to the specific ballot question committee. There, the Department relied heavily upon the fact that the same individual was controlling the money in the 501(c)(4) *and* the ballot question committee in order to find a violation. The Department concluded that the evidence showed contributions were received by the registered corporation and then corresponding or exact amounts were transferred to the registered ballot question committee, and in many instances, *after* the ballot question committee had already spent the money. What *HCFI* and *Detroit Forward* stand for is the proposition that a ballot question committee cannot shield its contributors by funneling the money through a corporation when the evidence clearly demonstrates that the ballot question committee and the corporation are the same entity or are controlled by the same individuals.

Yet, none of the same elements present in *HCFI* or *Detroit Forward* are present here. According to evidence submitted by MCFR’s president, Heather Lombardi, HCFI was formed in 2010.<sup>3</sup> MCFR has listed Stephen Linder and Denise DeCook as President and Treasurer respectively and its principal address is located in Lansing.<sup>4</sup> Comparatively, Unlock filed its statement of organization in 2020 listing Mary Doster as its treasurer and a mailing address in Okemos.<sup>5</sup>

Not only do the formation documents fail to support the allegations in the complaint, neither do the contributions or expenditures themselves. The 990 reports filed with the IRS demonstrate that since at least 2015, MCFR has solicited contributions and made expenditures for myriad political campaign activities unrelated to Unlock:

<u>Year</u>	<u>Total Revenue</u>	<u>Total Expenditures</u>
2015	\$ 494,358	\$ 135,503
2016	\$ 720,170	\$ 250,241
2017	\$ 1,010,594	\$ 205,855
2018	\$ 2,102,182	\$ 3,736,327

And according to the affidavit submitted by Heather Lombardi, President of MCFR, in 2019, MCFR had a bank account balance of over \$700,000 and did not have the need to solicit funds in order to contribute to Unlock. See MCFR’s Answer, Exhibit 1. Her affidavit further stated that she was not aware of MCFR soliciting contributions for the purpose of making an expenditure to Unlock. *Id.* Despite this, in your rebuttal, you argue the only way these fives contributions

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<sup>3</sup> Articles of Incorporation, available at: [https://cofs.lara.state.mi.us/CorpWeb/CorpSearch/CorpSearchFormList.aspx?SEARCH\\_TYPE=3](https://cofs.lara.state.mi.us/CorpWeb/CorpSearch/CorpSearchFormList.aspx?SEARCH_TYPE=3)

<sup>4</sup> IRS 990, available at: [https://apps.irs.gov/pub/epostcard/cor/271993953\\_201812\\_990O\\_2020060917183084.pdf](https://apps.irs.gov/pub/epostcard/cor/271993953_201812_990O_2020060917183084.pdf).

<sup>5</sup> Statement of Organization, <https://cfrsearch.nictusa.com/committees/519796>.

could be made to Unlock was if MCFR solicited the funds contrary to the statements made in Ms. Lombardi's affidavit.

The evidence presented in these complaints does not support your allegations that MCFR has met the definition of committee triggering registration requirements by soliciting contributions for the purpose of making expenditures to Unlock. MCFR was formed ten years prior to Unlock, neither shares common officers such as President or Treasurer, and MCFR maintained enough money in its account to make contributions to Unlock without having to solicit additional funds. Further, no evidence has been offered to rebut the statements made in Ms. Lombardi's affidavit that MCFR has not solicited funds, especially given the fact that the IRS statements provided show that MCFR has collected funds through fundraisers as part of its ordinary course of business for at least the last seven years.

It is not a violation of the Act for a registered 501(c)(4) to make a contribution to a ballot question committee. MCL 169.203(4). In order to be a violation of the Act, the evidence must show that MCFR has solicited contributions for the sole purpose of making expenditures to Unlock. *Id.* That evidence was present in both *HCFI* and *Detroit Forward* but is not present here.

Therefore, the Department finds that the evidence is insufficient to conclude that a potential violation of the Act has occurred and dismisses your complaint.

Sincerely,



Adam Fracassi  
Bureau of Elections  
Michigan Department of State

c: Brian Shekell, Attorney for MCFR  
Mike Cox, Attorney for Unlock



STATE OF MICHIGAN  
JOCELYN BENSON, SECRETARY OF STATE  
DEPARTMENT OF STATE  
LANSING

July 27, 2021

Mark Brewer  
Attorney for Robert LaBrant  
Goodman Acker P.C.  
17000 West Ten Mile, Second Floor  
Southfield, MI 48075

*Via Email*

Dear Mr. Brewer:

The Department of State received a response to the complaint your client filed against Michigan Citizens for Fiscal Responsibility, Michigan! My Michigan! and Unlock Michigan, which concerns an alleged violation of the Michigan Campaign Finance Act (MCFA), 1976 P.A. 388, MCL 169.201 *et seq.* A copy of the response is provided as an enclosure with this letter.

If you elect to file a rebuttal statement, you are required to send it within 10 business days of the date of this letter to the Bureau of Elections, Richard H. Austin Building, 1<sup>st</sup> Floor, 430 West Allegan Street, Lansing, Michigan 48918.

Sincerely,

A handwritten signature in black ink, appearing to read "Adam Fracassi".

Adam Fracassi  
Bureau of Elections  
Michigan Department of State

c: Michael Williams, Attorney for Unlock Michigan  
Brian Shekell, Attorney for Michigan Citizens for Fiscal Responsibility and Michigan!  
My Michigan!

August 23, 2021

Adam Fracassi  
Bureau of Elections  
Michigan Department of State  
430 W. Allegan  
Lansing, MI 48918

\* GERALD H. ACKER  
\*\* BARRY J. GOODMAN  
TIM SULOLLI  
JORDAN B. ACKER  
\*\*\* BRADLEY M. PERI

LARRY R. MAITLAND II  
MARK BREWER  
RONITA BAHRI  
MICHELLE T. AARON  
LEAH S. HOUGABOOM  
AMANDA B. WARNER  
BART P. O'NEILL

\* ALSO ADMITTED IN DC  
\*\* ALSO ADMITTED IN FLORIDA  
\*\*\* ALSO ADMITTED IN NY

[www.goodmanacker.com](http://www.goodmanacker.com)

RE: *LaBrant v Unlock Michigan, Michigan Citizens for Fiscal Responsibility,  
and Michigan! My Michigan!*

Dear Mr. Fracassi,

This is the rebuttal statement of Robert LaBrant (“LaBrant”) to the responses by Unlock Michigan (“Unlock”), Michigan Citizens for Fiscal Responsibility (“MCFR”), and Michigan! My Michigan! (“MMM”) (collectively the “Respondents”) to his Complaint.<sup>1</sup>

All of the defenses lack merit. The Department should find that there may be reason to believe that the MCFA was violated because 1) MCFR and MMM or persons acting on their behalf such as Mike Shirkey and Heather Lombardini solicited contributions for the purpose of making expenditures to Unlock, and MCFR and MMM failed to register and report as ballot question committees, and 2) Unlock failed to report the contributors to MCFR and MMM as its contributors.

## INTRODUCTION

As serious as the allegations against the Respondents are – if true, they would constitute one of the largest violations of the MCFA ever – the Complaint is about much more than the illegal fundraising scheme of Unlock, MCFR, and MMM.

MCFR, MMM, and Unlock Michigan should serve a cautionary example to the BOE just how fragile the MCFA is. When the MCFA took effect on June 1, 1977, it was based on the tenet of public disclosure and that sunshine makes for the best civic disinfectant. That tenet is now on life support.

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<sup>1</sup> MCFR and MMM complain about my service as LaBrant’s legal counsel, alleging that it has been “concealed.” MCFR/MMM Response at 1 n.1. My role has been fully disclosed since I filed a request for reconsideration in prior, separate complaints by LaBrant. When that request was denied because it was based on new evidence, the Department invited me to file a new complaint which LaBrant did with my assistance. There’s a simple, non-conspiratorial reason the Complaint was filed by LaBrant and not me: the complainant must certify the complaint. There has been no concealment of my role which in any event is irrelevant to the Complaint’s merits.

Unlock Michigan's successful statutory initiative repealing the 1945 gubernatorial emergency powers act is just the beginning. Unlock Michigan now promises to launch a second initiative petition drive (Unlock Michigan 2.0), this one restricting state and local public health orders. The Michigan Republican Party promises to lead a statutory initiative petition drive using Unlock Michigan's successful strategy which permits the Legislature to bypass a promised gubernatorial veto of election law restrictions by the Legislature enacting the initiative following certification by the Board of State Canvassers as to the sufficiency of petition signatures.

This is permitted by Article 2, Section 9 of Michigan's Constitution. The MCFA, however, requires disclosure to the public of the true funders of these petition drives. If Unlock, MCFR, and MMM become the model used to finance future ballot question committee activity, the MCFA is a dead letter.

## **I. THE PROCEDURAL DEFENSES LACK MERIT.**

Desperate to avoid the merits of the Complaint the Respondents raised several invalid procedural defenses. Indeed most of the Responses' focus is on procedure and avoiding the merits of the Complaint, a telling approach.

### **A. *This Is Not A Successive Complaint.***

The Respondents claim that this is an improper successive Complaint to previously dismissed complaints. MCFR and MMM Response at 1, 2-4; Unlock Response at 3-4.

It is not.

Not only is there an additional respondent in this Complaint – MMM – but as the Department has already recognized there is significant new evidence not provided in those previous complaints. *See* May 17, 2021 Letter Denying Reconsideration in *LaBrant v MCFR and Unlock*. Reconsideration was denied because there was substantial “new evidence” which the Department concluded should be the basis for a “new complaint.” *See id.* LaBrant accepted the Department's invitation to file this new Complaint based on that significant new evidence.

The Respondents cite the Department's Guidebook which defines a successive complaint as “against the same person regarding the same evidence or activity.” Unlock Response at 3-4; MCFR/MMM Response at 3. This Complaint does not meet those criteria. It not only adds a party – MMM – but provides vastly more and new evidence including 2 detailed affidavits.

MCFR and MMM also claim that the Complaint's preemptive discrediting of the Lombardini Affidavit somehow demonstrates that this is a successive complaint. Response at 3. However, as the Complaint stated the critique of that affidavit was done in anticipation – correctly it turns out – of its use by the Respondents. *See* Complaint at 3. The Lombardini Affidavit is attached to the MCFR/MMM Response and relied upon by them, vindicating the Complaint's anticipatory attack on it.

Finally, the MCFR/MMM Response claims that pre-2020 conduct in the Complaint could have been raised in LaBrant's previous complaints. Response at 3-4. That is of no moment – the

successive complaint doctrine is based on the *same* allegations against the *same* parties using the *same* evidence. It does not prevent the presentation of new evidence whatever its date in a new, distinct complaint as here.

**B.     *The Attacks On The “May Be Reason To Believe” Standard Fail.***

**1.     *The Complaint’s Citation To The FEC Standard Was Appropriate.***

All Respondents attack the use of federal law as an aid in defining Michigan’s “may be reason to believe” standard. This attack misses the mark for several reasons.

First, the interpretation of the MCFA has borrowed from federal law for decades. *See, e.g.*, October 31, 1984 Informational Letter to David A. Lambert at 3.

Second, all Respondents misstate the Michigan statutory standard in order to erect this straw man to attack. The Michigan standard is not “reason to believe” but “*may be* reason to believe.” MCL 169.215(10) (emphasis added). The words “may be” are critical because they lower the threshold considerably. LaBrant doesn’t have to prove at this stage that MCFA violations occurred or that there’s reason to believe violations occurred, only that there “*may be* reason to believe” violations occurred. The evidence in the Complaint easily meets that low threshold.

Third, LaBrant nowhere argues that Michigan’s “standard is the same as its federal counterpart.” Unlock Response at 5. As set forth above, the addition of “may be” is a critical difference. What LaBrant correctly argues is that the FEC’s definition of RTB supports his interpretation of MCL 169.215(10) – and it does:

*A “reason to believe” finding is not a finding that the respondent violated the Act, but instead simply means that the Commission believes a violation may have occurred.*

FEC, *Guidebook for Complainants and Respondents on the FEC Enforcement Process* 12 (2012) (emphasis added).

Finally, the assertion that the Complaint “is an effort to circumvent federal tax law protections on donor disclosure for social welfare organizations,” MCFR/MMM Response at 5, 7, also fails. MCFR’s and MMM’s federal tax status is irrelevant. No federal law exempts MCFR and MMM from regulation by the MCFA. No matter how they are organized or taxed they are still “persons” subject to the MCFA if their activity triggers the MCFA. *See* MCL 169.211(2) (defining “person”). As detailed in the Complaint, the evidence clearly establishes that there “may be reason to believe” that their activity triggered and violated the MCFA.

**2. *The “May Be Reason To Believe” Standard Does Not Require A “Smoking Gun.”***

Respondents strenuously argue that LaBrant must provide a “smoking gun.” *See* MCFR/MMM Response at 2, 4 (e.g., LaBrant “has presented no information showing that contributions were solicited by MCFR or MMM for the purpose of making an expenditure to Unlock Michigan”); there’s not “a single fact supporting the accusation that contributions were solicited by MCFR or MMM for the purpose of making an expenditure to Unlock Michigan”); Unlock Response at 5, 9 (e.g., “LaBrant has to offer facts showing that MCFR and MMM solicited contributions strictly in order to pass those contributions along to Unlock Michigan”).

The words “may be” and “believe” in MCL 169.215(10) easily rebut this argument. If the statute required a “smoking gun” it would have so stated, e.g., “a complaint must prove a violation of the MCFA with direct evidence.” The statute does not do that but instead creates a much lower threshold which requires no “smoking gun.” The evidence – direct, circumstantial, or inferred – need only demonstrate that there “may be reason to believe” that the MCFA was violated.

Consistent with the statute, the Department has never required a “smoking gun” to find that the standard of MCL 169.215(10) has been met. For example, the Department’s February 7, 2014 letter finding that there may be reason to believe that Citizens for Affordable Quality Home Care had violated the MCFA cited no “smoking gun” that HCFI solicited contributions for Citizens. Instead the Department concluded that HCFI did so based on all the evidence, including inferences from the evidence. *See id* at 2.

The absence of a “smoking gun” at this point in these proceedings is understandable. The corporations which responded to Shirkey’s or his agents’ solicitations to contribute millions of dollars to MCFR or MMM for the purpose of aiding Unlock fear Shirkey’s retaliation because he controls legislation he can use to reward or punish them. Only an investigation by the Department will provide legal protection against retaliation for those contributors enabling them to come forward.

Neither the text of MCL 169.215(10) nor the Department’s enforcement precedents require LaBrant to provide a “smoking gun” in order to show that there “may be reason to believe” that the MCFA was violated.

**C. *The Attacks On The Evidentiary Standards And Alleged Motives Of LaBrant And Timmer Fall Short.***

The Respondents spend several pages attacking the evidentiary standards and engaging in *ad hominem* attacks on the alleged motives of LaBrant and Timmer. *See* MCFR/MMM Response at 5-7; Unlock Response at 6.

The attacks on the speculative motives of LaBrant and Timmer are irrelevant to the legal and factual analysis of the Complaint. The state of mind of LaBrant and Timmer is immaterial here. If anything the vitriol of the Respondents’ attacks on them demonstrates that the Complaint has struck pay dirt.

MCFR and MMM assail the LaBrant and Timmer affidavits for not providing current information. Response at 6. This ignores the fact that those affidavits do provide current information. *See, e.g.* Timmer Affidavit ¶¶ 8, 10-13. But more importantly the information MCFR and MMM attack is *historical* information about the conduct of Sterling and MCFR which is relevant to and lays the foundation for demonstrating current violations of the MCFA. *See, e.g.* MRE 406 (“Evidence of . . . the routine practice of an organization. . . is relevant to prove that the conduct of the . . . organization on a particular occasion was in conformity with . . . routine practice.”).

LaBrant does not argue for an “anything goes” evidentiary standard. Unlock Response at 6. His Complaint carefully details the evidentiary standards with statutory and case law citations. *See* Complaint at 3. Those citations are supplemented in this rebuttal.

The examples Unlock gives of speculative evidence, Response at 6, are not speculative. The reference to a “dark money fiefdom” is simply descriptive of all of the other evidence in the Complaint. The assertion that Sterling answers to Shirkey is also supported by the evidence in the Complaint. There is ample direct and circumstantial evidence to “facilitate [a] reasonable inference,” *People v Wang*, 505 Mich 239, 251; 952 NW2d 334 (2020), that Sterling answers to Shirkey. Reasonable inferences are not speculation. *See id.* Moreover, as detailed below, the Respondents fail to provide any rebuttal *evidence* on the issue of Shirkey’s control of Sterling from the only person with personal knowledge, Shirkey.

**D. *The Complaint Against Unlock Is Clear.***

Unlock spends 3 pages arguing that it doesn’t understand which allegations in the Complaint apply to it. Response at 1-3.

The Complaint clearly states that “Unlock had MCFA reporting and other obligations it failed to meet.” Complaint at 3. The Department and all of the other parties plainly understand the allegations against Unlock. The Department summarized them very accurately in its June 3, 2021 letter advising Unlock of its right to respond to the Complaint:

“Mr. LaBrant alleges that Michigan Citizens for Fiscal Responsibility (MCFR) and Michigan! My Michigan! (MMM) have solicited contributions for the purposes of making expenditures to Unlock Michigan. Mr. LaBrant alleges that MCFR and MMM coordinated with Unlock to make such contributions in violation of the Act.”

Based on LaBrant’s allegations Unlock violated at least the following MCFA provisions listed in the Complaint:

- MCL 169.221(12) – Unlock allowed contributions intended for itself to be commingled with funds of MCFR and MMM;
- MCL 169.224(2)(c), (f) – Unlock failed to disclose that MCFR and MMM were operating as its secondary depositories;

- MCL 169.234 – Unlock filed incomplete reports failing to disclose information about the donors to MCFR and MMM whose funds were given to Unlock;
- MCL 169.241(3) – Unlock illegally received contributions from MCFR and MMM which were in fact contributions from others; and
- MCL 169.215(15) – all of the above violations subject Unlock to the penalties prescribed.

Unlock has ample notice of its violations of the MCFA.

## **II. RESPONDENTS’ “EVIDENCE” IS DEFICIENT.**

### **A. *There’s No Shirkey Affidavit.***

Shirkey obviously is at the center of the illegal activities described in the Complaint.

Respondents and their affiants – Wszolek and Lombardini – have longstanding professional relationships with Shirkey and could easily have obtained an affidavit from him denying key facts but they produced no such affidavit. Shirkey could have denied under oath and penalty of perjury that he solicited contributions to MCFR and MMM for the purpose of making contributions to Unlock. He could have sworn under oath that he doesn’t control Sterling, MCFR, and MMM and that he does not control Unlock through Wszolek or any other means. Shirkey could have declared under penalty of perjury that he had nothing to do with the millions of dollars MCFR and MMM contributed to MCFR.

But Respondents have provided no such affidavit which is a tacit admission of the truth of the allegations in the Complaint. The lack of such evidence together with the evidence in the Complaint allows the Department to infer at this point in the proceedings under its “wide latitude” in considering evidence that Shirkey did all those things. *See, e g, Young v Liquor Control Comm’n*, 39 Mich App 101, 103; 199 NW2d 295 (1972) (*per curiam*) (APA allows “wide latitude”).

### **B. *There’s No Financial Disclosure By MCFR and MMM Rebutting The Complaint’s Allegations.***

MCFR claims that it had a bank account balance of \$700,000 as of December 31, 2019. Lombardini Affidavit ¶ 5. Assuming that is true, that was enough to cover only the first \$700,000 of its 2020 contributions to Unlock totaling over \$1.8 million.

Without disclosing its donors’ identities, MCFR’s Response could have disclosed the amounts and dates of all of the contributions it received between January 1, 2020 and October, 2020 when it made its last direct contribution to Unlock. If MCFR’s claim that it was not raising money for the purpose of giving it to Unlock is true, that disclosure would’ve revealed that MCFR raised significantly *more* money than it gave to Unlock during that period and used it for other purposes.

Why didn't MCFR make such a disclosure? Why would MCFR hide information which could help exonerate it? It can reasonably be inferred that such a disclosure would have provided more evidence of its guilt, not exoneration, and that's why MCFR failed to provide it. *See, e.g., Ward v Conrail*, 472 Mich 77, 85-86; 693 NW2d 366 (2005) (failure of party to produce evidence under its control permits an adverse inference against that party).

The same analysis applies to MMM. Why didn't its response include financial information tending to show that it was raising money other than to give it to Unlock? That failure to disclose only leads to one inference – MMM was raising money to give to Unlock as the Complaint alleges. *See id.*

**C. *Wszolek's Affidavit Is Incompetent, Not Credible, And Irrelevant.***

Unlock relies on ¶ 3 of the Wszolek Affidavit to deny that Wszolek runs Unlock for Shirkey and that Shirkey controls Unlock:

All material facts asserted in the Response by its counsel are accurate, including that Senate Majority Leader Shirkey does not control Unlock Michigan; he is not the Treasurer or Designated Recordkeeper for Unlock Michigan; he does not share an office with Unlock Michigan; he does not serve in any capacity for Unlock Michigan; and he did not form, or cause to be formed, Unlock Michigan.

Analysis of this paragraph reveals that it is incompetent, not credible, and irrelevant. It is a non-denial denial.

First, the entire affidavit is not credible. As with the Lombardini Affidavit, Wszolek is not a principal here but merely Shirkey's well-paid agent. Wszolek has a substantial political, business, and financial interest in protecting Shirkey so his affidavit doing that has no credibility. *See* Complaint at 5-6 (detailing Wszolek's work for Shirkey).

Second, it's irrelevant that Shirkey isn't the Treasurer or Recordkeeper for Unlock, that he doesn't share office space, and that he serves in no capacity for Unlock. None of that is necessary for Shirkey to control Unlock.

Next, affidavits from lay people like Wszolek can provide only facts, not conclusions or opinions. It is a conclusory opinion, nothing more, when Wszolek states that "Senate Majority Leader Shirkey does not control Unlock Michigan." Whether Shirkey controls Unlock is a conclusion to be determined by the Department based on factual evidence and inferences from evidence, not based on the self-serving opinion of a layperson, an "opinion" which in any event lacks any factual foundation.

Fourth, the statement that Shirkey "did not form, or cause to be formed, Unlock Michigan" says nothing. Wszolek has already publicly admitted that he formed Unlock. *See* Complaint at 6 (Wszolek interviewed as the "founder" of Unlock). And the alleged fact that Shirkey didn't "cause" Unlock to be formed doesn't mean that Shirkey didn't "ask," "authorize," or "permit" Wszolek to do so. If Wszolek intended definitively to rule out a role for Shirkey in creating or

running Unlock, the affidavit would have said, for example, that “Shirkey had no role of any kind in the creation, operation, or funding of Unlock.” But Wszolek can’t say that under oath because it isn’t true. Instead he plays semantic games with words like “cause to be formed,” which leave ample room for a controlling Shirkey role while appearing to deny it.

Finally, it defies logic and common sense that Wszolek would create and run Unlock without Shirkey’s blessing. Wszolek is no lone wolf, he works closely for and with Shirkey. Does he really expect the Department to believe that he used two Shirkey-controlled (c)(4)’s, MCFR and MMM, to raise millions of dollars for Unlock and ran the Unlock petition effort without Shirkey’s consent and involvement? That’s simply not believable.

The Wszolek Affidavit is not credible, competent, or relevant.

### **III. UNDER THE DEPARTMENT’S ENFORCEMENT PRECEDENTS THE COMPLAINT PROVES THAT THERE MAY BE REASON TO BELIEVE THAT UNLOCK, MCFR, AND MMM VIOLATED THE MCFA.**

Unlock insists that unless the identical fact patterns in *HCFI* and *Detroit Forward* exist here, there can be no MCFA violations. Response at 6-9.

That rigid view of the law has been correctly rejected by the Department. As set forth in its letter of April 9, 2021 to LaBrant, *HCFI* and *Detroit Forward* establish *principles* of law, not fact patterns to be slavishly followed:

What *HCFI* and *Detroit Forward* stand for is the proposition that a ballot question committee cannot shield its contributors by funneling the money through a corporation when the evidence clearly demonstrates that *the ballot question committee and the corporation are the same entity or are controlled by the same individuals*.

At 4 (emphasis added). This statement of governing *principles* makes sense from a law enforcement perspective. If all parties had to do was avoid the precise fact patterns of *HCFI* and *Detroit Forward* to insulate themselves from liability they would quickly develop other ways to violate MCL 169.203(4). That is what Unlock, MCFR, and MM did here – they incorrectly believed that if their fundraising scheme simply didn’t mimic *HCFI* and *Detroit Forward* they could violate 169.203(4) and other provisions of the MCFA with impunity.

Thus, Unlock’s exposition at pages 6-9 only demonstrates that Unlock sought to avoid the fact patterns of *HCFI* and *Detroit Forward*. It does not prove that Unlock, MCFR, and MMM complied with the MCFA.

LaBrant understood that his Complaint had to provide evidence in accordance with those principles. He restated those principles in the context of this factual situation in his Complaint:

Properly understood, the principles of *HCFI* and *Detroit Forward* only require proof *at this stage* that based on direct evidence, circumstantial evidence, *or* reasonable inferences from all the available evidence there “may be reason to

believe” that 1) the MCFA applies to MCFR and MMM because they shared a common purpose, common control, and common funding with Unlock with which they coordinated, and 2) that as a result Unlock had MCFA reporting and other obligations it failed to meet.

At 3.

We now briefly summarize the evidence which demonstrates that under the principles of *HCFI* and *Detroit Forward* there may be reason to believe that Unlock, MCFR, and MMM violated the MCFA:

- MCFR and MMM are controlled by Sterling. *See* Complaint §§ III.A. and IV.
- Sterling has been controlled by its largest client, the Senate Republican Campaign Committee and the GOP State Senate Leader, currently Shirkey, for 11 years. *See* Complaint § III.A. Shirkey has not refuted his control of Sterling, MCFR, and MMM despite an opportunity to do so. *See* Section II.A., *supra*.
- The purposes of MCFR and MMM include raising money for the purpose of transferring it to other entities; MCFR has been doing so for 11 years. *See* Complaint § III.B. Its transfer of at least \$1.8 million to Unlock is consistent with this history of raising money for the purpose of transferring it to other entities. Despite the opportunity to do so, MCFR and MMM have refused to disclose whether they raised funds for any other purpose in 2020. *See* § II.B., *supra*.
- 86% of the funding of Unlock came from the Shirkey-controlled MCFR and MMM. But for that funding the Unlock petition drive never would have occurred. *See* Complaint § I. MCFR and MMM have refused to disclose whether they raised funds for any other purpose in 2020. *See* § II.B., *supra*.
- Shirkey has long sought and supported the repeal of 1945 PA 302, which has been his “No. 1 priority.” He’s done this through, among other things, legislation and endorsing Unlock’s petition drive. *See* Complaint § I.
- Wszolek created and controls Unlock and is paid by Unlock. *See* Complaint § II (“Wszolek said he controls Unlock Michigan”). Wszolek created Unlock after the Shirkey-supported legislation to repeal 1945 PA 302 failed to pass in the State House. *See id* §§ I and II.
- Wszolek works for Shirkey, is part of his inner political circle, and he created Unlock at Shirkey’s behest. *See id*. Shirkey has had the opportunity to deny these facts and has not. *See* § II.A., *supra*. Wszolek’s denial of Shirkey’s control is incompetent and not credible. *See* § II.C., *supra*.
- The direct and in-kind contribution pattern for MCFR and MMM to Unlock further demonstrates coordination with Unlock’s funding needs. *See* Complaint § V.

The evidence here satisfies the principles of *HCFI* and *Detroit Forward*. The evidence – direct, circumstantial, and inferences therefrom – shows that there may be reason to believe that:

- Beginning no later than June 1, 2020 Unlock, MCFR, and MMM shared a *common purpose*: funding Unlock's petition drive to repeal 1945 PA 302;
- Unlock, MCFR, and MMM were *commonly controlled* by Shirkey through his agents Wszolek, Lombardini, and Sterling; and
- Unlock, MCFR, and MMM were *commonly funded*, specifically MCFR and MMM raised funds during 2020 for the purpose of contributing them to Unlock.

### **CONCLUSION AND RELIEF SOUGHT**

For all these reasons and those stated in the Complaint, LaBrant requests that the Department:

1) Find that there may be reason to believe that Michigan Citizens for Fiscal Responsibility, Michigan! My Michigan!, and Unlock Michigan violated the MCFA including but not limited to MCL 169.215(15), 169.221(12), 169.224(2)(c), 169.224(2)(f), 169.234, and 169.241(3);

2) Conduct an investigation of MCFR and MMM by obtaining their bank records and records of contribution solicitations and receipts, and a list of donors to them by name, amount, and date since January 1, 2020; and

3) Take any further necessary steps to punish MCFR, MMM, and Unlock Michigan for their violations of the MCFA.

Sincerely,

*Mark Brewer*

Mark Brewer



STATE OF MICHIGAN  
JOCELYN BENSON, SECRETARY OF STATE  
DEPARTMENT OF STATE  
LANSING

October 27, 2021

Brian D. Shekell  
Clark Hill  
500 Woodward Ave., Suite 3500  
Detroit, MI 48226

Dear Mr. Shekell:

The Department of State (Department) has finished its initial investigation of the campaign finance complaint filed against your clients Michigan Citizens for Fiscal Responsibility (MCFR) and Michigan! My Michigan! (MMM), as well as against Unlock Michigan (Unlock), by Robert LaBrant alleging violations of the Michigan Campaign Finance Act (MCFA or Act). This letter concerns the current disposition of the complaint against your clients.

The complaint alleged that MCFR and MMM solicited or received donations for the purpose of making expenditures to Unlock. Unlock is a ballot question committee regulated by the MCFA. In support of these claims, Mr. LaBrant stated that MCFR and MMM together contributed over \$2.3 million in funding to Unlock from June to October 2020, “nearly 86%” of Unlock’s total funding during that period. The complaint also showed that MCFR and/or MMM frequently provided large amounts of funding to Unlock within days of Unlock making a large payment to the outside signature-gathering firm National Petition Management (NPM).

MCFR and MMM also jointly responded to the complaint.<sup>1</sup> In their response, MCFR and MMM claimed that neither organization “solicited or received contributions for the purpose of making an expenditure to Unlock Michigan or any other ballot question committee.” MCFR and MMM included a September 9, 2020 affidavit from Heather Lombardini stating that “MCFR ha[d] not

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<sup>1</sup> MCFR and MMM also alleged that the instant complaint should be dismissed as a successive complaint. However, as indicated in the Department’s April 9, 2021 dismissal to Mr. LaBrant, the prior complaint asked the Department only to investigate whether 5 contributions were violative of the Act. Because the instant complaint raises allegations not previously addressed in the first complaint, and adds an additional party, the Department does not treat this as a successive complaint.

solicited or received contributions for the purpose of making an expenditure to Unlock Michigan or any other ballot question committee.”<sup>2</sup>

Mr. LaBrant provided a rebuttal statement. In his rebuttal, Mr. LaBrant cited the failure of MCFR or MMM to provide financial statements or other information showing that the organizations did not violate the MCFA as evidence that the organizations had in fact violated the Act.

On October 8, 2021, the Department requested that MCFR and MMM provide the Department with IRS Form 990s for calendar year 2019 and 2020. The Department also requested that each organization provide the date and amount of each donation received in excess of \$500 or expenditure made in excess of \$500 between January 1, 2020 and the present, as well as the total value of assets controlled by each organization after each of those donations and expenditures. MCFR and MMM each provided a Form 990 for calendar year 2019 but declined to provide a Form 990 for calendar year 2020 and declined to provide the requested information about expenditures, contributions, and assets.

In Michigan, a committee is an organization which “receives contributions or makes expenditures for the purpose of influencing or attempting to influence the action of the voters for or against the nomination or election of a candidate, the qualification, passage, or defeat of a ballot question, or the qualification of a new political party, if contributions received total \$500.00 or more in a calendar year or expenditures made total \$500.00 or more in a calendar year.” MCL 169.203(4). The MCFA requires committees to file certain campaign statements detailing contributions and expenditures. See, e.g., MCL 169.234. Failure to file these required statements can result in civil and criminal penalties. *Id.* An organization making an expenditure to a ballot question committee is not a committee under the MCFA and is not subject to the reporting requirements of the MCFA, however, unless that organization “solicits or receives contributions for the purpose of making an expenditure to that ballot question committee.” MCL 169.203(4). Upon meeting the definition of committee, the organization is obligated to file a statement of organization with the appropriate filing official within 10 days of the committee’s formation, MCL 169.224, and is also required to file various campaign statements detailing the organization’s contributions and expenditures.

As discussed below, the Department finds that there may be reason to believe that MCFR and MMM violated the MCFA. Both MCFR and MMM may have taken actions that qualify each organization as ballot question committees under the MCFA. At the end of calendar year 2019, MCFR had \$715,137 in assets, and MMM had \$172,452 in assets. From June to October 2020, MCFR contributed approximately \$1,780,000 to Unlock, while MMM contributed

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<sup>2</sup> For the reasons more fully set forth below, despite these statements presented in the affidavit, they are not enough to overcome the other evidence submitted.

approximately \$550,000. In each case, the contributions by each organization to Unlock during 2020 far exceeds the assets controlled by each entity at the start of 2020. Moreover, the contributions by MCFR and/or MMM to Unlock were often made within days of similarly sized payments by Unlock to NPM, as set out in the following chart:

<b>Date</b>	<b>Contributing Organization</b>	<b>Amount Contributed to Unlock</b>	<b>Amount Paid by Unlock to NPM</b>
June 9, 2020	MCFR	\$10,000	-
June 18, 2020	MCFR	\$150,000	-
June 24, 2020	MCFR	\$400,000	-
June 25, 2020	-	-	\$300,000
July 20, 2020	MCFR	\$100,000	-
July 21, 2020	-	-	\$100,276.21
July 31, 2020	MCFR	\$35,000	\$100,000
August 3, 2020	-	-	\$44,784.85
August 6, 2020	MCFR	\$150,000	-
August 6, 2020	MMM	\$100,000	\$228,212
August 14, 2020	MCFR	\$25,000	-
August 20, 2020	MMM	\$100,000	-
August 21, 2020	MCFR	\$110,000	-
August 21, 2020	MMM	\$100,000	\$330,000
August 27, 2020	MCFR	\$700,000	-
August 28, 2020	-	-	\$166,248.86
August 31, 2020	-	-	\$160,317.68
September 11, 2020	-	-	\$183,298.30
September 18, 2020	-	-	\$150,000
October 1, 2020	MCFR	\$100,000	-
October 1, 2020	MMM	\$150,000	-
October 5, 2020	-	-	\$218,203.96
October 21, 2020	MMM	\$100,000	-

Given that contributions by MCFR and MMM to Unlock were closely followed by expenditures Unlock made to NPM totaling an almost identical value, it is clear that MCFR and MMM coordinated to some extent with Unlock. Accounting for the assets controlled by each organization at the end of calendar year 2019, between January 1, 2020, and October 1, 2020, MCFR solicited/received at least \$1,064,863 in contributions, while between January 1, 2020, and October 21, 2020, MMM solicited/received at least \$377,548.

As previously stated, it is not a violation of the Act for a group to raise funds in its normal course of conduct and make contributions to a ballot question committee or to coordinate with that ballot question committee. It is, however, a violation of the Act for an organization to raise

money on behalf of the ballot question committee in order to shield the organization's donors from the reporting requirements of the Act. The fundraising necessary to allow MCFR to contribute \$1,780,000 to Unlock and MMM to contribute \$550,000 to Unlock from June to October 2020 is substantial. Although it may be possible that each entity raised those funds in the first half of 2020 independently of each entity's support for Unlock, to assume that the aggressive fundraising activity necessary for each organization to raise the sums that were then transferred to Unlock was completely independent strains credulity. The disparity between each organization's assets going into 2020, the amount that each organization contributed to Unlock, and the timing of those contributions demonstrate a level of coordination showing the entities were not independent of each other.

In particular, the number of payments that MCFR and/or MMM made to Unlock days before Unlock made similarly sized payments to NPM suggests that MCFR and MMM were soliciting or receiving funds for the purpose of collecting contributions with the intent of financially supporting Unlock. Such fundraising for the purpose of supporting a ballot question committee, as is evidenced in the instant case, makes MCFR and MMM themselves ballot question committees responsible for registration and for filing appropriate campaign statements under the MCFA, but neither organization, to date, has registered as a committee nor filed those campaign statements as required by sections 24 and 33 of the Act.

Given the coordination between Unlock, the proximity of contributions made to Unlock and the expenditures made by Unlock, and the fact that neither MCFR nor MMM would have been able to make such contributions to Unlock without soliciting/receiving additional funds during 2020, there is reason to believe that MCFR and MMM may have solicited/received funds for the purpose of making contributions to Unlock.

When presented with a complaint, the Department is tasked to determine "whether or not there may be reason to believe that a violation of [the MCFA] occurred."<sup>3</sup> MCL 169.15(10). Once the

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<sup>3</sup> The MCFA directs the Department to initiate the resolution process if "there may be reason to believe that a violation of [the MCFA] occurred." MCL 169.15(10). The Department notes that, under federal law, the Federal Election Commission (FEC) will initiate an investigation into a campaign finance complaint if the Commission finds that "reason to believe that a violation of [federal law] has occurred or is about to occur." 11 CFR § 111.10. The FEC will find that "reason to believe" a violation has occurred or is about to occur when "the available evidence in the matter is at least sufficient to warrant conducting an investigation, and where the seriousness of the alleged violation warrants either further investigation or immediate conciliation." Federal Election Commission; Policy Statement; Commission Action in Matters at the Initial Stage in the Enforcement Process, 72 Fed. Reg. 51, 12545 (March 16, 2007). Because the MCFA sets a lower threshold for the Department to initiate an informal resolution process – whether there "*may be* reason to believe that a violation of [the MCFA] occurred" (emphasis added) – than federal law sets for the FEC to initiate an investigation – whether there *is* "reason to believe" – the Department's longstanding practice is to initiate the informal resolution process when the evidence available to the Department at the time that a determination is issued can reasonably support an inference that the MCFA has been violated.

Department has made this determination, the Department must employ “informal methods such as a conference [or] conciliation” to correct the potential violation or to prevent further violation. *Id.* As part of the informal resolution process, parties may furnish the Department with evidence showing that a potential violation of the MCFA has not actually occurred. It is possible that MCFR and/or MMM can provide information tending to show that its fundraising activities in 2020 were in fact independent of subsequent or concurrent donations to Unlock, and thus demonstrate that MCFR and/or MMM are not ballot question committees regulated by the MCFA. However, such information has not been made available to the Department, and the evidence available to the Department at this time suggests that “there may be reason to believe” that MCFR and MMM “solicit[ed] or receiv[ed] contributions for the purpose of making an expenditure” to Unlock, and thus that MCFR and MMM are ballot question committees under the MCFA with corresponding and unfulfilled filing obligations.

This letter serves to notify you and your clients that the Department has determined there may be reason to believe that your clients have violated the Act, and serves to notify you and your clients that the Department is beginning the informal resolution process. “If, after 90 business days, the secretary of state is unable to correct or prevent further violation by these informal methods, the secretary of state shall do either of the following:

- (a) Refer the matter to the attorney general for the enforcement of any criminal penalty provided by this act.
- (b) Commence a hearing as provided in subsection (11) for enforcement of any civil violation.”

MCL 169.215(11).

Please contact the undersigned at [fracassia@michigan.gov](mailto:fracassia@michigan.gov) by 5:00 p.m. on Friday, November 5 to discuss a resolution to matter, including additional information your clients may be able to provide that may affect the Department’s determination of the scope of any violation that may have occurred.

Sincerely,



Adam Fracassi  
Bureau of Elections



STATE OF MICHIGAN  
JOCELYN BENSON, SECRETARY OF STATE  
DEPARTMENT OF STATE  
LANSING

June 3, 2022

Brian D. Shekell  
Clark Hill  
500 Woodward Ave., Suite 3500  
Detroit, MI 48226

Dear Mr. Shekell:

As you know, on October 27, 2021 the Michigan Department of State (Department) issued a determination finding reason to believe that your clients Michigan Citizens for Fiscal Responsibility (MCFR) and Michigan! My Michigan! (MMM), took actions that might constitute a violation of the Michigan Campaign Finance Act (MCFA or Act).

Once the Department made this determination, the Department attempted to employ the required "informal methods such as a conference [or] conciliation" to correct the potential violation or to prevent further violation. MCL 169.215(10). Though the Department has contacted you multiple times requesting copies of specific contributions, you have objected to providing these records through the informal process. The statute provides 90 business days for the Department to engage this resolution process. *Id.* This period lapsed on March 11, 2022. Additionally, the statute requires the Department to post on the secretary of state's website any complaint, response, or rebuttal statement received, and any correspondence that is dispositive of the violation or alleged violation between the secretary of state and the complainant or the person against whom the complaint was filed, within 30 days of a determination. *Id.*

The Department is offering you a last and final opportunity to agree to the attached conciliation agreement. You have until 3:00pm on Friday, June 3, 2022 to accept this offer by contacting the undersigned at [fracassia@michigan.gov](mailto:fracassia@michigan.gov).

By close of business on June 3, 2022, the Department will post the documents described above to the secretary of state's website and make public its determination. Additionally, if you do not agree to this offer, the Department will have no choice but to proceed with referral to the Attorney General's office for enforcement against your clients.

Sincerely,

A handwritten signature in blue ink, reading "Adam Fracassi".

Adam Fracassi  
Michigan Bureau of Elections



STATE OF MICHIGAN  
JOCELYN BENSON, SECRETARY OF STATE  
DEPARTMENT OF STATE  
LANSING

June 3, 2022

The Honorable Dana Nessel  
Department of Attorney General  
G. Mennen Williams Building  
525 West Ottawa Street  
Lansing, MI 48933

**Re: Robert LaBrant v Michigan Citizens for Fiscal Responsibility and Michigan! My  
Michigan!  
Michigan Campaign Finance Complaint**

Dear Attorney General Nessel:

Please allow this letter to serve as a referral to the Attorney General of the above-referenced campaign finance matter for the enforcement of any criminal penalties under the Michigan Campaign Finance Act. MCL 169.215(10)(a).

If you or your staff would like any additional information regarding this case, please contact this office.

Sincerely,

s/ Michael J. Brady

Michael J. Brady, Chief Legal Director  
Michigan Secretary of State

MJB/mes

cc: Heather Meingast, Division Chief, CLEE Division