

## 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.

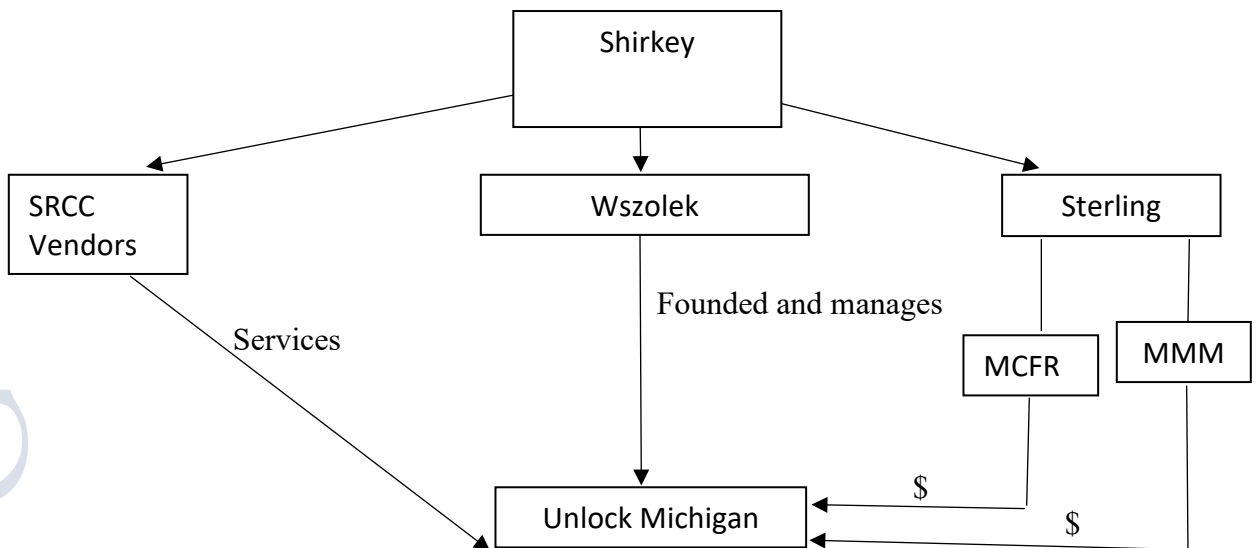
The coordination has continued. In January 2021, Unlock had MCFR directly pay nearly \$85,000 of its legal bills, reported as in-kind contributions on the April, 2021 report of Unlock. Such payments take active collaboration – MCFR wouldn't have known the legal bills existed unless Unlock disclosed and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





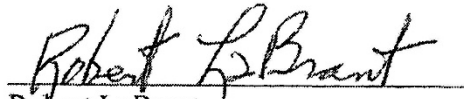
For all these reasons, I request that you:

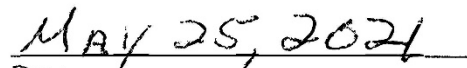
1) Find that there may be reason to believe that Michigan Citizens for Fiscal Responsibility, Michigan! My Michigan!, and Unlock Michigan violated the MCFA including but not limited to MCL 169.215(15), 169.221(12), 169.224(2)(c), 169.224(2)(f), 169.234, and 169.241(3);

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

Sign up to receive tips and updates from the team.



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// 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

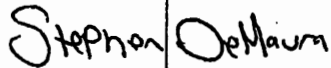
Jonathan A. Peterson  
Office of General Counsel  
Federal Election Commission  
1050 First Street NE  
Washington, DC 20463

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 slanted style.

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 Czuber	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	Vienha 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 Vincente 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 Vincente 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 Vincente 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 Vincente 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 Wicks	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	Cherokee 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. Aldred 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. Aldred 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 Services
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 Vesey 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 & Hare	8321 Main Street	Williamsport	PA	17241	\$	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	\$	2,051.36	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 Vesey Street	New York	NY	10281	\$	5,680.86	Credit card expense
11/14/11	City of Alexandria	301 King Street	Alexandria	VA	22314	\$	132.14	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 Vesey 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 Juliett 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 Seabluft	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 Seabluft	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 Seabluft	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	Oldahoma OK 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:

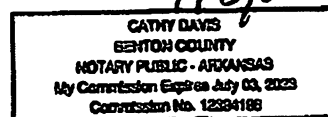
1. In accordance with the conciliation agreement in the above-referenced matter, the attached submission outlines the receipts and disbursements for Americans for Job Security ("AJS"), including the identity of any person or organization that gave money to AJS, for the time period of 2010 through 2012.
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> <div>(3/2015)</div>	<div><u>10-24-19</u> <b>DATE PREPARED</b></div>

# **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*

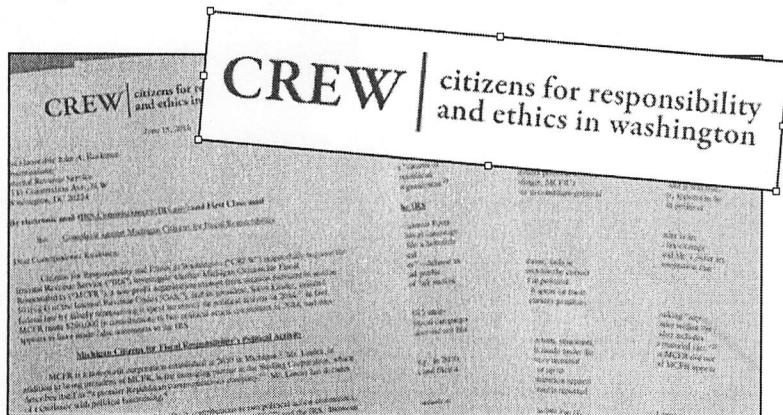
In a new complaint, a national ethics group says a shadowy Michigan nonprofit appears to have made false statements to the Internal Revenue Service (IRS) about its political spending.

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)

#### Tags

Press Release 2016 News  
<https://mcfn.org/tag/press>  
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**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* 20124 Instructions 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', with a stylized flourish at the end.

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>F</b> Name and address of principal officer STEVE LINDER 106 W Allegan Lansing, MI 48933		<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 type="checkbox"/> No If "No," attach a list (see instructions)  <b>H(c)</b> Group exemption number	
<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>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) <input type="checkbox"/> 0			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

## 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.

<b>A</b> For the 2010 calendar year, or tax year beginning <b>FEBRUARY 26</b> , 2010, and ending <b>DECEMBER 31</b> , 2010	
<b>B</b> Check if applicable: <input checked="" type="checkbox"/> Address change <input type="checkbox"/> Name change <input checked="" type="checkbox"/> Initial return <input type="checkbox"/> Terminated <input type="checkbox"/> Amended return <input checked="" type="checkbox"/> Application pending	<b>C</b> Name of organization <b>MICHIGAN CITIZENS FOR FISCAL RESPONSIBILITY</b> Doing Business As <b>MICHIGAN CITIZENS FOR FISCAL RESPONSIBILITY</b> Number and street (or P.O. box if mail is not delivered to street address) Room/suite <b>112 E ALLEGAN STE 700</b> City or town, state or country, and ZIP + 4 <b>ANSING, MI 48933</b> <b>D</b> Employer identification number <b>27-1993953</b> <b>E</b> Telephone number <b>517 267-9012</b> <b>G</b> Gross receipts \$ <b>1,296,100</b> <b>H(a)</b> Is this a group return for affiliates? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <b>H(b)</b> Are all affiliates 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>F</b> Name and address of principal officer <b>JEFF TIMMER - SAME ADDRESS AS ABOVE</b>	
<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>J</b> Website: ▶ <b>NA</b>	
<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 <b>2010</b> <b>M</b> State of legal domicile <b>MI</b>

**Part I Summary**

<b>Activities &amp; Governance</b>	<b>1</b> Briefly describe the organization's mission or most significant activities: <b>INFORMATION AND EDUCATION ON FISCAL PUBLIC POLICY ISSUES</b>		
	<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 2010 (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 (C), line 12	<b>7a</b>	<b>0</b>
<b>b</b> Net unrelated business taxable income from Form 990-T, line 54	<b>7b</b>	<b>0</b>	
<b>Revenue</b>	<b>8</b> Contributions and grants (Part VIII, line 1h)	Prior Year	Current Year
	<b>9</b> Program service revenue (Part VIII, line 2g)	0	1,296,000
	<b>10</b> Investment income (Part VIII, column (A), lines 3, 4, and 7d)	0	0
	<b>11</b> Other revenue (Part VIII, column (A), lines 5, 6d, 8c, 9c, 10c, and 11a)	0	100
	<b>12</b> Total revenue—add lines 8 through 11 (must equal Part VIII, column (A), line 12)	0	1,296,100
<b>Expenses</b>	<b>13</b> Grants and similar amounts paid (Part IX, column (A), lines 1–3)	0	0
	<b>14</b> Benefits paid to or for members (Part IX, column (A), line 4)	0	0
	<b>15</b> Salaries, other compensation, employee benefits (Part IX, column (A), lines 5–10)	0	0
	<b>16a</b> Professional fundraising fees (Part IX, column (A), line 11e)	0	0
	<b>b</b> Total fundraising expenses (Part IX, column (D), line 25) ▶	0	0
	<b>17</b> Other expenses (Part IX, column (A), lines 11a–11d, 11f–24f)	0	1,287,971
	<b>18</b> Total expenses Add lines 13–17 (must equal Part IX, column (A), line 25)	0	1,287,971
<b>Net Assets or Fund Balances</b>	<b>19</b> Revenue less expenses. Subtract line 18 from line 12	0	8,129
	<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)	0	8,129
	<b>22</b> Net assets or fund balances Subtract line 21 from line 20	0	1,534

**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.

<b>Sign Here</b>	Signature of officer <i>Jeff Timmer</i>	Date <b>AUG 15, 2011</b>			
	Type or print name and title <b>President &amp; Secretary</b>				
<b>Paid Preparer Use Only</b>	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	Firm's name ▶				
	Firm's address ▶				
May the IRS discuss this return with the preparer shown above? (see instructions)					<input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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>	1	Briefly describe the organization's mission or most significant activities: Inform and educate public on fiscal policy issues.1	
	2	Check this box <input type="checkbox"/> 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 2012 (Part V, line 2a)	0
	6	Total number of volunteers (estimate if necessary)	0
	7a	Total unrelated business revenue from Part VIII, column (A), line 12	0
	7b	Net unrelated business taxable income from Form 990-T, line 34	0
<b>Revenue</b>	8	Contributions and grants (Part VII, line 1h)	Prior Year 50,000 Current Year 1,026,000
	9	Program service revenue (Part VIII, line 2g)	
	10	Investment income (Part VIII, column (A), lines 5, 6d, 8c, 9c, 10c, and 11e)	
	11	Other revenue (Part VIII, column (A), lines 5, 6d, 8c, 9c, 10c, and 11e)	
	12	Total revenue—add lines 8 through 11 (must equal Part VIII, column (A), line 12)	50,000 1,026,000
<b>Expenses</b>	13	Grants and similar amounts paid (Part IX, column (A), lines 1–3)	
	14	Benefits paid to or for members (Part IX, column (A), line 4)	
	15	Salaries, other compensation, employee benefits (Part IX, column (A), lines 5–10)	
	16a	Professional fundraising fees (Part IX, column (A), line 11e)	108,500
	b	Total fundraising expenses (Part IX, column (D), line 25) ▶	
	17	Other expenses (Part IX, column (A), lines 11a–11d, 11f–24e)	56,523 917,500
	18	Total expenses. Add lines 13–17 (must equal Part IX, column (A), line 25)	56,523 1,026,000
<b>Net Assets or Fund Balances</b>	19	Revenue less expenses. Subtract line 18 from line 12	<523> 0
	20	Total assets (Part X, line 16)	Beginning of Current Year 72 End of Year 72
	21	Total liabilities (Part X, line 26)	0 0
	22	Net assets or fund balances. Subtract line 21 from line 20	72 72

**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.

<b>Sign Here</b>	Signature of officer	Date 10/9/13
	JEFFREY TIMMER, President	

<b>Paid Preparer Use Only</b>	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	Firm's name ▶				
	Firm's address ▶	Firm's EIN ▶			
					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

▶ Attach to Form 990.

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**



☒ 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.

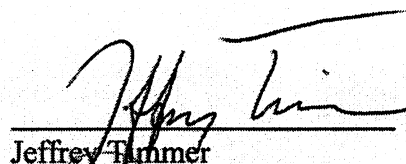
11. Many SRCC vendors are also working for Unlock.

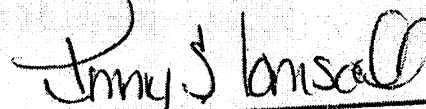
12. I have worked for and against many ballot questions in Michigan. I am familiar with their logistical and cash flow needs.

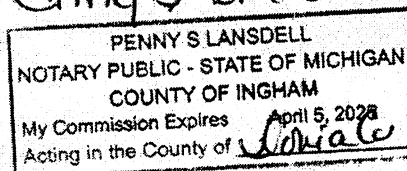
13. I have worked with National Petition Management ("NPM") and am familiar with its contracts, signature collection, and payment practices. NPM requires a large deposit/retainer before beginning signature collection, and regular large periodic payments on an agreed upon schedule as it collects signatures.

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 )

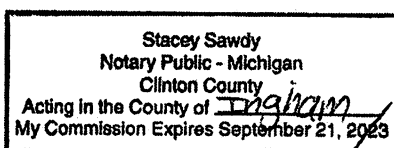
Robert S. LaBrant, being first duly sworn, deposes and says:

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



**Michael R. Williams**

williams@bsplaw.com

T/F: 269.820.4100

July 16, 2021

Adam Fracassi  
Bureau of Elections  
Michigan Department of State  
430 W. Allegan, First Floor  
Lansing, MI 48918  
[fracassia@michigan.gov](mailto:fracassia@michigan.gov)

***Re: LaBrant v. Unlock Michigan, Michigan Citizens for Fiscal Responsibility, and Michigan! My Michigan!; Response to Campaign Finance Complaint (the “Complaint”) Filed by Robert LaBrant (the “Complainant”) dated May 25, 2021***

Dear Mr. Fracassi:

We represent Unlock Michigan in this matter. We have received your letter dated June 3, 2021, which contained the Complaint. As you note, the Complaint alleges both that Michigan Citizens for Fiscal Responsibility (“MCFR”) and Michigan! My Michigan! (“MMM”) “solicited contributions for the purposes of making expenditures to Unlock Michigan,” and that “MCFR and MMM coordinated with Unlock to make such contributions in violation of the Act.”

We appreciate the chance to respond to these allegations. Our comments follow.

**I. The Complaint doesn’t make clear what allegations apply to Unlock Michigan.**

Responding to a campaign-finance complaint shouldn’t be a matter of guesswork, but guessing is all Unlock Michigan can do here. The Complaint contains no specific factual or legal allegations against Unlock Michigan that explain how Unlock Michigan allegedly violated any section of the Michigan Campaign Finance Act (“MCFA”). Instead, the Complaint contains page after page of false and unsubstantiated claims about control and coordination among the described entities. Without some nexus to *campaign finance law*, however, these allegations are nothing more than unactionable rumors.

True, the Complaint notes on the first page, and again in its “Conclusion,” that Unlock Michigan purportedly violated the following MCFA sections: MCL 169.215(15); MCL 169.221(12); MCL 169.224(2)(c); MCL 169.224(2)(f); MCL 169.234; and MCL 169.241(3). But beyond these conclusory legal citations, the Complaint never explains *how* Unlock Michigan violated any of the half-dozen MCFA sections it references. The Complaint’s analysis section (labelled “Facts”) doesn’t even cite these provisions.



Unlock Michigan cannot respond to nonexistent allegations. The Department of Elections requires complaints to explain “*how* the section(s) of the MCFA ... has been violated” for a reason. See Bureau of Elections, *Guidebook for Complainants and Respondents on the Campaign Finance Complaint Process* (“*Guidebook*”) <<https://bit.ly/2Uw1CY4>> (published June 2019) (accessed July 6, 2021), p 5 (emphasis added). Mr. LaBrant bears that burden here. Because he has failed to even try to bring facts and law together into a cohesive argument, the Secretary should dismiss his Complaint.

## **II. Unlock Michigan didn’t violate the MCFA sections the Complaint references.**

The Complaint says Unlock Michigan “violated” six MCFA sections. These arguments fail for the following reasons:

### **1. MCL 169.215(15)**

MCL 169.215(15) says: “Unless otherwise specified in this act, a person who violates a provision of this act is subject to a civil fine of not more than \$1,000.00 for each violation. A civil fine is in addition to, but not limited by, a criminal penalty prescribed by this act.” Because this provision contains no requirements, but just sets forth the default penalty for violating the MCFA, it is impossible for Unlock Michigan or any other person to violate it.

### **2. MCL 169.221(12)**

MCL 169.221(12) says, in relevant part: “Contributions received by a committee must not be commingled with other funds of an agent of the committee or of any other person.”

The Complaint provides no evidence that MCFR or MMM are Unlock Michigan’s agents such that donations received by MCFR or MMM are effectively contributions to Unlock Michigan. The record shows, instead, that neither MCFR or MMM are Unlock Michigan’s agent or even independent contractor. An agency is defined as “a fiduciary relationship created by express or implied contract or by law, in which one party (the agent) may act on behalf of another party (the principal) and bind that other party by words or actions.” *Breighner v Mich. High Sch Athletic Assoc*, 255 Mich App 567, 582–83 (2003), quoting *Black’s Law Dictionary* (7th ed 1999). In Michigan, a principal-agent relationship exists when the principal has the right to control the agent. See *Little v Howard Johnson Co*, 183 Mich App 675, 680 (1990). Significantly, the Complaint does not (and cannot) allege that there is any express or implied contract between Unlock Michigan and MCFR or MMM because no such contract exists. Nor does Unlock Michigan have a right to control these groups or any aspect of their activities. The Complaint therefore does not (and cannot) allege any fact supporting the naked legal conclusion that MCFR or MMM are agents of Unlock Michigan.

More importantly, though, Unlock Michigan did not commingle funds. *Black’s Law Dictionary* (11th ed 2019) defines “commingle” as “[t]o put together (as funds or property) into one mass.” There is no evidence that Unlock Michigan combined its funds with the funds of any other person or entity—let alone MCFR or MMM. The Complaint doesn’t offer a single fact showing that

Unlock Michigan put its funds with anyone else's to create "one mass" of money. Unlock Michigan didn't violate MCL 169.221(12).

3. MCL 169.224(2)(c), (f)

MCL 169.224(2)(c) requires a committee's statement of organization to include the following: "The name and address of the financial institution in which the official committee depository is or is intended to be located, and the name and address of each financial institution in which a secondary depository is or is intended to be located." And MCL 169.224(2)(f) requires a committee's statement of organization to include the following: "Identification of the committee as a candidate committee, political party committee, independent committee, independent expenditure committee, political committee, or ballot question committee if it is identifiable as such a committee." Unlock Michigan's statement of organization includes all this information, and the Complaint never alleges otherwise.

4. MCL 169.234

MCL 169.234 requires a ballot question committee to file certain campaign finance reports. Unlock Michigan has filed all required campaign finance reports, and the Complaint never alleges otherwise.

5. MCL 169.241(3)

MCL 169.241(3) says: "A contribution must not be made, directly or indirectly, by any person in a name other than the name by which that person is identified for legal purposes." Unlock Michigan has made no contributions, and the Complaint never alleges otherwise.

\*\*\*

In short, even a cursory analysis of these MCFA sections shows that Unlock Michigan did not violate any of the specific MCFA sections raised in the Complaint.

**III. The Department should dismiss the Complaint because it is successive.**

The Department forbids functionally identical successive campaign-finance complaints:

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. [Bureau of Elections, *Guidebook* <<https://bit.ly/2Uw1CY4>> (published June 2019) (accessed July 6, 2021), p 8.]

In such a case, the Department will investigate only if “the complaints are distinct enough to warrant” it. *Id.*

This Complaint raises the “same violations against the same persons regarding the same evidence [and] activity” that Mr. LaBrant raised in another complaint a few months ago. In late 2020, Mr. LaBrant filed his first campaign-finance complaint against Unlock Michigan (“LaBrant Compl I”). LaBrant raised the same sorts of issues he does here—all centered around the idea that Unlock Michigan is part of a “dark money” scheme run by Senate Majority Leader Shirkey. The Department carefully reviewed LaBrant Compl I and, on April 9, 2021, dismissed it, reasoning:

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. [Ex 1, April 9, 2021 Dismissal Letter, p 5 (“Dismissal Letter”).]

Three weeks later, Mr. LaBrant sought reconsideration of that decision. See Ex 2, April 28, 2021 Request for Reconsideration. That Request for Reconsideration set out Mr. LaBrant’s arguments in support of LaBrant Compl I. The Department evidently took no further action on that request.

Undeterred, Mr. LaBrant was back a few weeks later with another complaint that stated the same facts and made the same arguments under the same MCFA provisions he had just lost on. (“LaBrant Compl II”).<sup>1</sup> A side-by-side comparison of the Request for Reconsideration and LaBrant Compl II shows they are functionally identical. See Ex 3, Comparison of the Request for Reconsideration and LaBrant Compl II. Mr. LaBrant just changed a few transitions and words to reflect the new posture of his same arguments. About 99% of LaBrant Compl II is a straight copy and paste job from the Request for Reconsideration, which merely summarized Mr. LaBrant’s arguments in support of LaBrant Compl I. In other words, LaBrant Compl II says the same activity by the same respondent violated the same six statutory sections. Compare Request for Reconsideration, p 12, with LaBrant Compl II, p 11. Because LaBrant Compl II raises the “same violations against the same persons regarding the same evidence [and] activity,” it should be dismissed under the *Guidebook*’s “Successive Complaint” policy.

At some point, the concept of “asked and answered” must apply to end these concocted theories of cash flow, control, and coordination. *EEOC v Westinghouse Elec Corp*, 925 F2d 619, 631 (CA 3, 1991) (no one is entitled to “endless bites at the same apple”); accord *Jiggetts v DC*, 319 FRD 408, 418 (DDC, 2017). The Department should dismiss this second complaint just as it did the first.

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<sup>1</sup> In all other sections, Unlock Michigan refers to LaBrant Compl II as simply “Complaint.”

**IV. The Complaint doesn't show that MCFR or MMM solicited contributions for the sole purpose of contributing to Unlock Michigan.**

The Dismissal Letter I fully sets out the only relevant inquiry regarding MCFR's and MMM's solicitations of contributions:

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. [Dismissal Letter, p 5.]

In other words, Mr. LaBrant has to offer facts showing that MCFR and MMM solicited contributions strictly in order to pass those contributions along to Unlock Michigan. This he fails to do; indeed, the Complaint doesn't even *try* to show this. Instead, it raises three red herrings, which are addressed here:

**1. The federal “reason to believe” standard is much different than Michigan’s “reason to believe” standard.**

The Complaint first tries to borrow improper standards from federal authorities. The Complaint is wrong that the MCFA's reason-to-believe standard is the same as its federal counterpart.

The Federal Election Commission says the federal reason-to-believe stage is just an “initial vote to proceed.” Federal Election Commission, *Guidebook for Complainants and Respondents on the FEC Enforcement Process* <<https://bit.ly/3yNlogQ>> (published May 2012) (accessed July 11, 2021, p 12. This is even a lower standard than, say, “probable cause to believe”—another standard Federal Election Campaign Act regulations use. See 11 CFR 111.17.

Michigan campaign-finance regulations use Michigan's reason-to-believe standard like Michigan's criminal law uses the probable-cause standard. See, e.g., MAC 169.56(1) (“If, following the informal hearing, the secretary of state determines there is no reason to believe a violation of the act or these rules has occurred, the complaint shall be dismissed.”). Because the federal scheme also contains a “probable cause to believe” stage and the MCFA also requires “reason to believe” even after an informal hearing, this makes the federal reason-to-believe stage fundamentally different from the MCFA's reason-to-believe stage.

Ultimately, though, this attempt to lower the burden of proof is irrelevant because this Complaint fails (just as LaBrant Complaint I failed) to provide *any* evidence that either MCFR or MMM solicited contributions for the sole purpose of making expenditures to Unlock Michigan.

## **2. The evidentiary standard doesn't change just because a complainant lacks evidence.**

The Complaint tries to excuse its lack of evidence by introducing an “anything goes” evidentiary standard. One could call this a “don’t raise the bridge, lower the river” approach. John D. Ayer, *An Unrepentant View of the Sale-Lease Distinction*, 4 J Bankr L & Prac 291, 301 (1995).<sup>2</sup> In Mr. LaBrant’s view, anything passes for evidence—including the barest inuendo, rumor, and guesswork. Not surprisingly, all his Complaint offers is a ginned-up cash flow theory, fanciful box charts on control, and baseless allegations on coordination. This isn’t sufficient to warrant further investigation.

The Department can safely ignore the Complaint’s musings. In administrative proceedings, the agency may exclude “[i]rrelevant, immaterial or unduly repetitious evidence.” MCL 24.275. And there is a difference between circumstantial evidence—which an agency *may* use to establish a fact—and speculation—which an agency *cannot* use. The Complaint relies nearly exclusively on speculative evidence. For example, the Complaint conclusively asserts that Senate Majority Leader Shirkey personally created MMM to expand “his dark money fiefdom.” Complaint, p 8. And it asserts that Sterling, which was folded into Lambert & Co many years ago and now has an *entirely different management team*, “answers to the GOP Senate Majority Leader.” *Id.* at 7.

The Complaint’s speculation runs most rampant, though, when it makes the unsubstantiated and baseless assertion that “Shirkey Political Lieutenant Fred Wszolek Created and Runs Unlock Michigan for Shirkey.” *Id.* at 5–6 (capitalization in original). To be clear, 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. See Ex 4, Affidavit of Fred Wszolek dated July 13, 2021.

On the whole, the Complaint demonstrates an unhealthy obsession with Senate Majority Leader Shirkey, including his non-existent formal or direct role with Unlock Michigan. These reckless assertions that he controls Unlock Michigan are irrelevant and categorically false. The Department should not countenance this rumor and innuendo. Most importantly, it cannot find that these unfounded assertions provide a reason to believe that further investigation is warranted. *Ykimoff v Foote Memorial Hosp*, 285 Mich App 80, 87 (2009) (“Cause in fact may be established by circumstantial evidence, but the circumstantial evidence must not be speculative and must support a reasonable inference of causation.” (cleaned up)).

## **3. The Dismissal Letter correctly applied the Department’s precedents.**

The Complaint says the Department did not “properly underst[and]” two of the Department’s own enforcement precedents—*D’Assandro v Home Care First, Inc. (HCFI)* and *Turnaround Detroit v Detroit Forward*. Complaint, p 3.

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<sup>2</sup> Referencing the 1968 British comedy film starring Jerry Lewis titled, “Don’t Raise the Bridge, Lower the River.”

On the contrary, the Dismissal Letter accurately summarized *HCFI* and *Detroit Forward*:

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. [Dismissal Letter, p 4.]

*HCFI* and *Detroit Forward* do not support the Complaint's baseless allegations and are distinguishable. For instance:

- *HCFI* and *Detroit Forward* involved committees and entities that had a director/officer in common. But Unlock Michigan has no director or officer in common with either MCFR or MMM.
- In *HCFI*, 99.984% of the money in one committee's (Citizens') account came from contributions raised by the other committee's (HCFI's) efforts. That supported the inference that HCFI was soliciting contributions on behalf of Citizens. This is not true with respect to Unlock Michigan and MCFR or MMM.
- In *HCFI*, one of the principal activities of one of the committees was to "assist and provide financial support" to the other committee; and in *Detroit Forward*, an entity raised funds to "provide financial support to other groups engaging in direct candidate advocacy." But here, neither MCFR's nor MMM's stated purpose is to provide financial support to Unlock Michigan. Nor could this conceivably be one of their core purposes. MCFR was formed 10 years before Unlock Michigan, and MMM was formed two years before Unlock Michigan—both long before the pandemic, Governor Whitmer's abuse of emergency powers, and the need to repeal 1945 PA 302.
- In *HCFI*, the two committees (HCFI and Citizens) were formed within a few days of each other. But, again, MMM and MCFR were respectively formed two and 10 years before Unlock Michigan.

- In *HCFI*, both committees listed the same address as their official address. But Unlock Michigan, MCFR, and MMM have different addresses.
- In *HCFI*, the Department found that the two committees “shared the same bank account and there was no physical transfer of money” between the two committees. But here, MCFR, MMM, and Unlock Michigan all have separate bank accounts. There is no allegation to the contrary. Indeed, the Complaint confirms this by showing many transfers of money from one bank account to another.
- In *HCFI*, HCFI’s transfers of funds to Citizens closely “coincided with substantial expenditures” by Citizens. But that is not the case here. There is no correlation between Unlock Michigan’s expenditures and MCFR’s and MMM’s contributions. The Complaint tries to tie some of these contributions to Unlock Michigan’s expenditures to its vendor, National Petition Management. But as every freshman statistics student knows, “correlation is not causation.” *Craig v Oakwood Hosp*, 471 Mich 67, 93 (2004). And here, there is no causation. In keeping with the nature of a petition drive, Unlock Michigan paid National Petition Management every few days no matter what contributions it received. There is no link to MCFR or MMM’s contributions. The Complaint, again, tries to make something out of nothing.
- In *HCFI*, Citizens received only one contribution besides those from HCFI. But here, Unlock Michigan has received contributions from over 2,200 distinct persons—entities and individuals alike.
- Finally, in *HCFI*, the Department knew HCFI was soliciting contributions for the “purpose of making an expenditure” to Citizens (see MCL 169.203(4)) because an HCFI contributor actually reported that Citizens was the recipient of these contributions. Nothing like that has happened here.

Facts matter. Given the facts here, *HCFI* and *Detroit Forward* in no way support the Complaint or Mr. LaBrant’s requested relief. On the contrary, those decisions and the facts they were premised on support the Department finding (again) that no violations of the MCFA have occurred. The Department should again apply *HCFI* and *Detroit Forward* to these facts the same way it did a few months ago:

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. MCFR has listed Stephen Linder and Denise DeCook as President and Treasurer respectively and its principal address is located in Lansing. Comparatively, Unlock filed its statement of organization in 2020 listing Mary Doster as its treasurer and a mailing address in Okemos.

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

July 16, 2021

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made expenditures for myriad political campaign activities unrelated to Unlock[.]  
[Dismissal Letter, p 4 (cleaned up).]

### **CONCLUSION**

Mr. LaBrant's newly minted "control and coordination" theory<sup>3</sup> brings with it some superficially impressive (but substantively meaningless) charts and graphs. But, like his previous "cash flow" theory<sup>4</sup> the Department already rejected, the present Complaint lacks merit. With no evidence that either MCFR or MMM solicited *any* contribution for the sole purpose of making expenditures to Unlock Michigan, the Complaint relies exclusively upon baseless allegations and speculation dressed up as "circumstantial evidence." *Robins v Garg*, 276 Mich App 351, 362 (2007) (noting that "circumstantial evidence must not be speculative"). Not even the Complaint's attempt to lower the legal and evidentiary standards can save it from its inevitable dismissal.

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Thank you for your consideration of our comments in this matter. If you have any questions, please contact me so either Unlock Michigan or I can address any question or provide more information. Because the Complaint does not adequately plead any MCFA violations by Unlock Michigan, if Mr. LaBrant styles or states new allegations to address that deficiency in his rebuttal or reply, then Unlock Michigan respectfully requests the opportunity to respond to what would become a new Complaint.

Again, thank you for your consideration of our arguments and this response.

Sincerely,



Michael R. Williams

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<sup>3</sup> So named to avoid the plain text of MCL 169.203(4).

<sup>4</sup> So named for the same reason.



## AFFIDAVIT

### **Affidavit of Fred Wszolek**

STATE OF MICHIGAN   )  
  ) ss.  
COUNTY OF EATON    )

Fred Wszolek, being first duly sworn, deposes and says that this Affidavit is made upon personal knowledge of the facts stated herein, and if sworn as a witness, the affiant can testify competently to the following to the best of his knowledge:

1. I am the Spokesperson for Unlock Michigan, a ballot question committee.
2. I have reviewed the campaign finance complaint (the "Complaint") filed by Robert LaBrant dated May 25, 2021, as well as Unlock Michigan's response (the "Response") to the Complaint.
3. 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.


FURTHER, AFFIANT SAYETH NOT.

Dated: July 13, 2021

  
\_\_\_\_\_  
Fred Wszolek

STATE OF MICHIGAN   )  
  ) ss.  
COUNTY OF EATON    )

On this 13th day of July 2021, before me, a notary public in and for said county, personally appeared Fred Wszolek, and executed the foregoing instrument and who acknowledged that he executed the same as his free act and deed.

  
\_\_\_\_\_  
Eric Doster, Notary Public  
Ingham County, Michigan  
Acting in Eaton County, Michigan  
My commission expires: July 15, 2024



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.

---

<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

Patrick Seyferth  
Bush Seyferth PLLC  
151 South Rose Street, Suite 707  
Kalamazoo, Michigan 49007

Re: *LaBrant v. Unlock Michigan et al.*  
Campaign Finance Complaint  
No. 2021-05-08-21

Dear Mr. Seyferth:

The Department of State (Department) has finished its initial investigation of the campaign finance complaint filed against your client Unlock Michigan (Unlock), as well as against Michigan Citizens for Fiscal Responsibility (MCFR) and Michigan! My Michigan! (MMM), 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 client.

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.

Unlock responded to the complaint. In its response, Unlock claimed that the complaint did not specify which provisions of the MCFA Unlock violated, and stated that Unlock had complied with all relevant provisions of the MCFA.<sup>1</sup>

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<sup>1</sup> Your client 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.

Mr. LaBrant provided a rebuttal statement, but his rebuttal primarily addressed the allegations presented against MCFR and MMM.

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 ballot question committees to make certain filings on a scheduled basis. Specifically, a statewide ballot question committees must file a statement of organization within 10 days of the committee’s formation, MCL 169.224(1), must file a campaign statement by April 25 and July 25 of every year, MCL 169.234(1)(c), must file a campaign statement no later than 35 days after the petition form is filed with the Secretary of State, *id.* at (2), and must file an annual statement by January 31 of the following year, MCL 169.235(1).<sup>2</sup>

The Department has reviewed this matter and finds that there is insufficient evidence to support a finding that there “may be reason to believe” that Unlock violated the MCFA. Unlock is a statewide ballot question committee who is obligated to make filings with the Department and the clerk of the most populous county in the state. MCL 169.236(2). Review of Unlock’s filings show that Unlock has satisfied all of the filing requirements set forth by the MCFA related to contributions received and expenditures made during the June to October time period covered in the complaint.<sup>3</sup> Specifically:

- Unlock was formed on June 1, 2020, and filed a statement of Organization on June 2, 2020, in compliance with MCL 169.221(1).
- Unlock filed a July 2020 Quarterly Report on July 25, 2020, in compliance with MCL 169.234(1)(c).
- Unlock’s petition form was filed with the Secretary of State on July 6, 2020 and a Qualification campaign statement was filed on August 8, 2020, in compliance with 169.234(2).
- Unlock filed an annual campaign statement on January 4, 2021, in compliance with MCL 169.235(1).

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<sup>2</sup> Unlock did not sponsor a ballot petition that appeared on the ballot during 2020, so Unlock did not have pre- or post-election statements due under MCL 169.234(1)(a) or (b) during 2020.

<sup>3</sup> Unlock’s filings can be viewed on the Department’s campaign finance database at <https://cfrsearch.nictusa.com/committees/519796>.

The complaint contained no allegations that any filings submitted by Unlock contained inaccurate information or in any other way failed to comply with the Act.

Because none of the violations of the MCFA alleged in the complaint has been substantiated by sufficient evidence, the Department dismisses the complaint and will take no further enforcement action.

Sincerely,

A handwritten signature in black ink, appearing to read "Adam Fracassi", written in a cursive style.

Adam Fracassi  
Bureau of Elections