Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

OFFICE OF CONGRESSIONAL ETHICS
UNITED STATES HOUSE OF REPRESENTATIVES

REPORT

Review No. 12-9525

The Board of the Office of Congressional Ethics, by a vote of no less than four members, on August 24, 2012, adopted the following report and ordered it to be transmitted to the Committee on Ethics of the United States House of Representatives.

SUBJECT: Representative Aaron Schock

NATURE OF THE ALLEGED VIOLATION: In March 2012, Representative Aaron Schock may have solicited contributions for an independent expenditure-only political committee in excess of $5,000 per donor, in violation of federal law, House rules, and standards of conduct.

RECOMMENDATION: The Board of the Office of Congressional Ethics recommends that the Committee on Ethics further review the above allegation because there is substantial reason to believe that Representative Schock violated federal law, House rules, and standards of conduct.

VOTES IN THE AFFIRMATIVE: 6

VOTES IN THE NEGATIVE: 0

ABSTENTIONS: 0

MEMBER OF THE BOARD OR STAFF DESIGNATED TO PRESENT THIS REPORT TO THE COMMITTEE ON ETHICS: Omar S. Ashmawy, Staff Director and Chief Counsel.

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OFFICE OF CONGRESSIONAL ETHICS
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FINDINGS OF FACT AND CITATIONS TO LAW

Review No. 12-9525

On August 24, 2012, the Board of the Office of Congressional Ethics (the "Board") adopted the following findings of fact and accompanying citations to law, regulations, rules, and standards of conduct (*in italics*).

The Board notes that these findings do not constitute a determination that a violation actually occurred.

I. INTRODUCTION

1. In March 2012, Representative Adam Kinzinger and Representative Don Manzullo were opponents in the Republican primary election for the 16th District of Illinois.

2. On or about March 8, 2012 a political committee, Campaign for Primary Accountability, Inc. ("CPA"), began making independent expenditures opposing Representative Manzullo with direct mail, email, and online advertisements.

3. On or about March 11, 2012, Representative Aaron Schock began soliciting contributions for CPA.

4. CPA needed to raise a large amount of funds quickly in order to purchase television and radio commercials opposing Representative Manzullo before election day on March 20, 2012.

5. In four days, from March 14 to March 17, 2012 CPA received contributions of at least $115,000 as a result of the efforts of Representative Schock and his campaign committee, Schock for Congress. The donors were: 18th District Republican Central Committee ($25,000); Every Republican is Crucial PAC ("ERIC PAC") ($25,000); Donor 1 ($35,000); and Donor 2 ($30,000).

6. During the same four-day time period, CPA made independent expenditures totaling approximately $130,000 to oppose Representative Manzullo, including television and radio commercials.

7. On March 20, 2012, Representative Kinzinger defeated Representative Manzullo in the primary election.

8. On or about April 6, 2012, Representative Schock explained in an interview with *Roll Call* that he had approached Representative 1 in March 2012 and requested a contribution for CPA's television advertising in support of Representative Kinzinger. The following statement was attributed to Representative Schock: "I said, 'Look, I'm going to do $25,000 [specifically] for the Kinzinger campaign for the television campaign,' and said, 'Can you match that ?'" "And he said, 'Absolutely.'"[1]

A. <u>Summary of Allegations</u>

9. In March 2012, Representative Aaron Schock may have solicited contributions for an independent expenditure-only political committee in excess of $5,000 per donor, in violation of federal law, House rules, and standards of conduct.

10. The Board finds that there is substantial reason to believe that Representative Schock violated 2 U.S.C. § 441i(e)(1)(A); House Rule 23, clause 1; and the Code of Ethics for Government Service, ¶ 2, by soliciting campaign contributions for an independent expenditure-only committee in excess of $5,000 per donor.

B. <u>Jurisdictional Statement</u>

11. The allegation that is the subject of this Review concern Representative Aaron Schock, a Member of the United States House of Representatives for the 18th District of Illinois. The Resolution the United States House of Representatives adopted creating the Office of Congressional Ethics ("OCE") directs that, "[n]o review shall be undertaken . . . by the board of any alleged violation that occurred before the date of adoption of this resolution."[2] The House adopted this Resolution on March 11, 2008. Because the conduct under review occurred after March 11, 2008, the OCE has jurisdiction in this matter.

C. <u>Procedural History</u>

12. The OCE received a written request for a preliminary review in this matter signed by at least two members of the Board on April 30, 2012. The preliminary review commenced on May 1, 2012.[3] The preliminary review was scheduled to end on May 30, 2012.

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[1] John Stanton, *Eric Cantor Gave $25K to Anti-Incumbent PAC to Aid Adam Kinzinger*, Roll Call, Apr. 6, 2012.
[2] H. Res. 895, 110th Cong. §1(e), as amended (the "Resolution').
[3] A preliminary review is "requested" in writing by members of the Board of the OCE. The request for a preliminary review is "received" by the OCE on a date certain. According to the Resolution, the timeframe for conducting a preliminary review is thirty days from the date of receipt of the Board's request.

13. At least three members of the Board voted to initiate a second-phase review in this matter on May 29, 2012. The second-phase review commenced on May 31, 2012.[4] The second-phase review was scheduled to end on July 14, 2012.

14. The Board voted to extend the second-phase review for an additional period of fourteen days on July 13, 2012. The second-phase review ended on July 28, 2012.

15. The Board voted to refer the matter to the Committee on Ethics and adopted these findings on August 24, 2012.

16. This report and findings in this matter were transmitted to the Committee on Ethics on August 30, 2012.

D. <u>Summary of Investigative Activity</u>

17. The OCE requested and received testimonial and, in some cases, documentary information from the following sources:

    (1) Representative Schock;

    (2) Representative Schock's Chief of Staff;

    (3) Representative Schock's Campaign Director;

    (4) CPA Development Coordinator;

    (5) CPA Managing Director;

    (6) Donor 1;

    (7) Donor 2;

    (8) Representative 1;

    (9) Senior Advisor of Representative 1; and

    (10) Lobbyist Donor 1.

18. The following individuals declined to produce documentary and testimonial information in response to Requests for Information and were determined to be non-cooperating witnesses:

[4] According to the Resolution, the Board must vote on whether to conduct a second-phase review in a matter before the expiration of the thirty-day preliminary review. If the Board votes for a second-phase, the second-phase begins when the preliminary review ends. The second-phase review does not begin on the date of the Board vote.

(1) Michael Bigger, Chairman, 18th District Republican Central Committee;

(2) Rob Collins, Partner, Purple Strategies LLC;

(3) Rodney Davis, former staffer of Representative John Shimkus; and

(4) Paul Kilgore, Treasurer, 18th District Republican Central Committee.

II. REPRESENTATIVE SCHOCK SOLICITED CONTRIBUTIONS FOR CAMPAIGN FOR PRIMARY ACCOUNTABILITY, INC.

A. Law, Regulations, Rules, and Standards of Conduct

Federal Election Campaign Act ("FECA")

19. *Pursuant to 2 U.S.C. § 441i(e)(1)(A), a "candidate, individual holding Federal office, agent of a candidate or an individual holding Federal office, or any entity directly or indirectly established, financed, maintained or controlled by or acting on behalf of 1 or more candidates or individuals holding Federal office shall not solicit, receive, direct, transfer, or spend funds in connection with an election for Federal office, including funds for any Federal election activity, unless the funds are subject to the limitations, prohibitions, and reporting requirements of [the Federal Election Campaign Act]."*

20. *"[N]o person shall make contributions . . . to any other political committee (other than a committee described in subparagraph (D)) in any calendar year which, in the aggregate, exceed $5,000 . . . ."*[5]

21. *"No multicandidate political committee shall make contributions . . . to any other political committee in any calendar year which, in the aggregate, exceed $5,000."*[6]

22. *The Federal Election Commission ("FEC") issued an Advisory Opinion explicitly discussing federal officials soliciting for independent expenditure-only committees.*[7] *"Federal officeholders . . . may not solicit unlimited contributions from individuals, corporations, or labor organizations on behalf of independent expenditure-only political committees ('IEOPCs') . . . . Federal officeholders . . . may solicit up to $5,000 from individuals (and any other source not prohibited by the Act from making a contribution to*

[5] 2 U.S.C. § 441a(1)(C).
[6] 2 U.S.C. § 441a(2).
[7] FEC Advisory Opinion 2011-12 (Exhibit 1 at 12-9525_0002-0006).

a political committee) on behalf of an IEOPC, because those funds are subject to the Act's amount limitations and source prohibitions." [8]

23. *IEOPCs "may* <u>*accept unlimited contributions*</u> *from individuals, corporations, and labor organizations; however, the Act's solicitations restrictions remain applicable to contributions* <u>*solicited by Federal candidates*</u> *. . . ."*[9]

24. *The FEC also published additional explanatory information in its Campaign Guide for Congressional Candidates and Committees.*[10] *The guide explains that "Federal candidates and officeholders may raise funds on behalf of IEOPCs so long as they only solicit funds subject to the Act's amount limitations and source prohibitions—i.e., up to $5000 from individuals (and any other source not prohibited by the Act from making a contribution to a political committee)."*[11]

25. *The House Ethics Manual acknowledges that the FEC is the primary source for interpretations of FECA and states that "FECA is enforced primarily by the [FEC], and House Members and their campaign staff should refer to the explanatory materials and advisory opinions issued by the FEC."*[12]

<u>*House Rules and Standards of Conduct*</u>

26. *"While FECA and other statutes on campaign activity are not rules of the House, Members and employees must bear in mind that the House Rules require that they conduct themselves 'at all times in a manner that shall reflect creditably on the House' (House Rule 23, clause 1)."* [13]

27. *"In addition, the Code of Ethics for Government Service, which applies to House Members and staff, provides in ¶ 2 that government officials should '[u]phold the Constitution, laws and legal regulations of the United States and of all governments therein and never be a party to their evasion.'"*[14]

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[8] *Id*. at 12-9525_0004.
[9] *Id*. at 12-9525_0005 (emphasis added).
[10] FEC Campaign Guide for Congressional Candidates (August 2011) (Exhibit 2 at 12-9525_0008-0011).
[11] *Id*. at 12-9525_0010.
[12] House Ethics Manual 122.
[13] *Id.*
[14] *Id.*

28. *"Accordingly, in violating FECA or another provision of statutory law, a Member or employee may also violate these provisions of the House rules and standards of conduct."*[15]

29. *"Moreover, under these rules, a Member or employee must take reasonable steps to ensure that any outside organization over which he or she exercises control – including the individual's own authorized campaign committee or, for example, a 'leadership PAC'- operates in compliance with applicable law."*[16]

B. <u>CPA Received Contributions from Representative 1, the 18th District Republican Central Committee, and Donor 1</u>

30. CPA is a political committee registered with the Federal Election Commission ("FEC") as an independent expenditure-only committee, which may raise funds in unlimited amounts.[17]

31. In March 2012, CPA became involved in an Illinois primary election between two Republican incumbents, Representative Adam Kinzinger and Representative Donald Manzullo.[18]

32. In early March 2012, CPA Managing Director learned that a House staffer, Rodney Davis,[19] planned to have contributions sent to CPA from various donors for television commercials opposing Representative Manzullo.[20]

33. Mr. Davis expected CPA to use the contributions to pay for at least $100,000 of television commercials.[21] The email below is a follow-up communication between Mr.

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[15] House Ethics Manual 122. *See also* House Comm. On Standards of Official Conduct, In *the Matter of Representative Jay Kim*, H. Rep. 105-797, 105th Cong., 2d Sess. (1998) (involving a Statement of Alleged Violations that included a violation of House rules based on a violations of FECA).
[16] House Ethics Manual 123.
[17] Campaign for Primary Accountability, Inc. FEC Statement of Organization, dated September 27, 2011 ("CPA Statement of Organization") (Exhibit 3 at 12-9525_0013). According to its website, the mission of CPA is "to bring true competition to our electoral process, to give voters real information about their choices, and to restore fair, not fixed, elections." About Campaign for Primary Accountability, http://www.campaign4primaryaccountability.org/about/. To achieve this goal, CPA created the Equalizer Campaign which was intended to "level the playing field in primary elections." *Id*.
[18] *See* Memorandum of Interview of CPA Managing Director, July 12, 2012 ("CPA Managing Director MOI") (Exhibit 4 at 12-9525_0021).
[19] Mr. Davis, at the time, was a staffer for Representative John Shimkus and a volunteer for Representative Shimkus' campaign committee. CPA Managing Director learned about Mr. Davis from the Co-Chairman of CPA, Eric O'Keefe, who told CPA Managing Director to contact Mr. Davis because Mr. Davis knew of individuals who would contribute to CPA. CPA Managing Director MOI (Exhibit 4 at 12-9525_0021).
[20] *Id*.; Email from Rodney Davis to CPA Managing Director, dated March 16, 2012 ("Rodney Davis Email") (Exhibit 5 at 12-9525_0024) .
[21] Rodney Davis Email at 12-9525_0024.

Davis and CPA Managing Director concerning the status of contributions received and expenditures for television commercials.[22]

From: Rodney Davis <[redacted]@volunteersforshimkus.org>
Subject: Re: Out of office
Date: March 16, 2012 2:27:18 PM CDT
To: Jamie Story <[redacted]@citizenleaderalliance.org>
Cc: "Eric O'Keefe" <[redacted]@mhtc.net>

Jamie, the 25k echeck yesterday was rescinded, and the money was wired today from the 18th Congressional District PAC. That puts you at $90,000 already wired. $10,000 more may have been wired today from Canning, but I am not sure there. Have John get me a copy of the buy that shows at least $100,000 being spent on Rockford TV and any cable outlets you have added. Thx.

34. The CPA Development Coordinator told the OCE that Mr. Davis was the contact person for the $120,000 that CPA received from the following donors: Representative 1's Leadership PAC ($25,000); the 18th District Republican Central Committee ($25,000); Donor 1 ($35,000); Donor 2 ($30,000); and the American College of Radiology PAC ($5,000).[23]

35. Mr. Davis refused to cooperate with the OCE. As a result, the OCE was unable to obtain information from Mr. Davis concerning his role in soliciting contributions for CPA and his interactions with Representative Schock related to the contributions.

C. <u>Representative Schock Asked Representative 1 to Contribute $25,000 to CPA</u>

36. Representative 1 told the OCE that, on or about March 12, 2012, he received a telephone call from Representative Schock.[24]

37. Representative 1 stated that Representative Schock asked him whether he would give $25,000 to a political committee in Illinois that was involved in the race between Representative Kinzinger and Representative Manzullo.[25] Representative 1 later learned that the political committee was CPA.[26]

38. According to Representative Schock, sometime after March 10, 2012, he called Representative 1 and said something to the effect of "We're doing $25,000," and asked if Representative 1 would "consider doing $25,000."[27] He stated that the words "we're

[22] *Id.*
[23] Memorandum of Interview of CPA Development Coordinator, July 12, 2012 ("CPA Coordinator MOI") (Exhibit 6 at 12-9525_0028); FEC Form 3X of CPA, Reporting Receipts and Disbursements for March 1 to March 31, 2012 ("CPA Form 3X") (Exhibit 7 at 12-9525_0036-0040).
[24] Memorandum of Interview of Representative 1, July 20, 2012 ("Rep. 1 MOI") (Exhibit 8 at 12-9525_0086).
[25] *Id.* at 12-9525_0087.
[26] *Id.*
[27] Memorandum of Interview of Representative Schock, July 26, 2012 ("Schock MOI") (Exhibit 9 at 12-9525_0091).

doing $25,000" referred to the 18th District Republican Central Committee contribution.[28] He told the OCE that he referred to it as "we" because it was a donation being made from within his district.[29]

39. Representative 1 told Representative Schock on the call that he would contribute $25,000 to the committee.[30]

40. Representative 1 also put Representative Schock in contact with Rob Collins because he believed that Mr. Collins would be able to assist Representative Schock with raising funds for CPA.[31]

41. Mr. Collins is the former Chief of Staff of Representative 1 and is a partner with the political strategy firm Purple Strategies LLC.[32] Representative 1 described Mr. Collins as someone who could assist Representative Schock with raising money for CPA.[33]

[28] *Id.*
[29] *Id.*; Representative Schock also told the OCE that his request for Representative 1 to "consider doing $25,000" was "DC speak" for asking whether Representative 1 could "come up with" $25,000 in any of a variety of ways. When asked for general examples of how one may come up with a contribution, Representative Schock stated that a Member may contribute from his campaign committee; solicit from citizens; contribute from a Leadership PAC; or contribute from another political committee. *Id*. Representative Schock said that he did not discuss such alternative ways of contributing with Representative 1 when he asked for the $25,000 contribution. *Id*.
[30] Rep. 1 MOI (Exhibit 8 at 12-9525_0087).
[31] *Id.*
[32] Biography of Rob Collins, http://www.purplestrategies.com/people/.
[33] Rep. 1 MOI (Exhibit 8 at 12-9525_0087).

42. As seen in the email below, on March 15, 2012, Mr. Collins provided Ray Allen, a consultant for ERIC PAC (Leadership PAC of Representative 1) with the wiring instructions for sending a $25,000 contribution to CPA.[34]

From: Rob Collins (Purple Strategies) [redacted]@purplestrategies.com]
Sent: Thursday, March 15, 2012 10:50 AM
To: Ray Allen
Attachments: CPA_prospectus_and_reply_form.pdf; CPA_Wiring_Instructions.pdf

Ray--below is some information for the super pac that is in that IL race. You want me to connect you with the super pac person today via email? ps--we dont need to do $100k as BD said we could, the other Members have done $25k, we should match that.

Hey Ted;

It was good to talk to you today. Below is the Youtube link for the ad that Shimkus, Schock and Cantor have sent money in to support that the Campaign for Primary Accountability is running. They are a 527 organized super PAC. The mailing and wiring information is attached. I have also cc'ed and attached Jamie Story's, the President for the Campaign for Primary Accountability, contact information if you have any questions about where or how to send a contribution. Thanks for the support, we really appreciate it.

Rob

YouTube: http://www.youtube.com/watch?v=IhbzNs7iF5o

Jamie Story
President
The Citizen Leader Alliance
P.O. Box 27133
Houston, Texas 77227

43. On the same day, Mr. Allen called Representative 1 to confirm that he wanted ERIC PAC to contribute $25,000 to CPA.[35] Representative 1 asked him whether it was legal to make such a contribution and Mr. Allen told him that the contribution was legal.[36]

44. ERIC PAC contributed $25,000 to CPA on March 15, 2012.[37]

[34] Email from Rob Collins to Ray Allen, dated March 15, 2012 (Exhibit 24 at 12-9525_0142).
[35] Rep. 1 MOI (Exhibit 8 at 12-9525_0087).
[36] *Id*.
[37] CPA FEC Form 3x (Exhibit 7 at 12-9525_0036).

D. Representative Schock's Campaign Committee May Have Asked the 18th District Republican Central Committee to Contribute $25,000 to CPA

45. The 18th District Republican Central Committee is a political party committee affiliated with the Illinois Republican Party.[38] The committee has a federal account registered with the FEC.[39]

46. Michael Bigger is a member of the 18th District Republican Central Committee.[40] Paul Kilgore is the Treasurer of the 18th District Republican Central Committee.[41]

47. Representative Schock, who represents the 18th District of Illinois, assisted the 18th District Republican Central Committee with establishing its federal account.[42] Representative Schock's Campaign Director opened the bank account for the 18th District Republican Central Committee.[43]

48. The 18th District Republican Central Committee is also a member of Representative Schock's joint fundraising committee, Schock Victory Fund.[44]

49. Representative Shock's Chief of Staff told the OCE that he works for Representative Schock's campaign committee as an "unofficial political advisor".[45] He advises Representative Schock on various issues, including campaign contributions Representative Schock should make.[46]

50. Representative Schock's Campaign Director told the OCE that she reports to Representative Schock and occasionally to Representative Schock's Chief of Staff.[47] She

[38] 18th District Republican Central Committee FEC Statement of Organization ("18th District Committee Statement of Organization") (Exhibit 10 at 12-9525_0096).
[39] *Id.*
[40] Schock MOI (Exhibit 9 at 12-9525_0091); Memorandum of Interview of Representative Schock's Campaign Director, July 26, 2012 ("Campaign Director MOI") (Exhibit 11 at 12-9525_102); Memorandum of Interview of Representative Schock's Chief of Staff, July 20, 2012 ("COS MOI") (Exhibit 12 at 12-9525_105).
[41] CPA Statement of Organization (Exhibit 10 at 12-9525_0094).
[42] Schock MOI (Exhibit 9 at 12-9525_0090).
[43] Campaign Director MOI (Exhibit 11 at 12-9525_101).
[44] 18th District Committee Statement of Organization (Exhibit 10 at 12-9525_0098); Schock Victory Committee FEC Statement of Organization (Exhibit 13 at 12-9525_0111). The 18th District Committee was first named as one of the four committees participating in joint fundraisers with the Schock Victory Committee in the March 2011 amended statement of organization. Prior to March 2011, Kinzinger for Congress was one of the four committees affiliated with the Schock Victory Committee according to Schock Victory Committee statements of organization filed with the FEC.
[45] COS MOI (Exhibit 12 at 12-9525_105).
[46] *Id.*
[47] Campaign Director MOI (Exhibit 11 at 12-9525_101).

stated that Representative Schock or Representative Schock's Chief of Staff tells her when to make contributions from Schock for Congress to other political committees.[48]

51. On or about March 14, 2012, Representative Schock's Chief of Staff contacted Representative Schock's Campaign Director and asked her to make a $25,000 contribution from the 18th District Republican Central Committee to CPA.[49]

52. Representative Schock's Campaign Director asked Representative Schock's Chief of Staff whether this contribution was "ok" because she was concerned about the large amount of the contribution.[50] Representative Schock's Chief of Staff assured her that the contribution was "ok."[51]

53. Representative Schock's Campaign Director did not recall needing any additional approval from anyone else to make the contribution.[52]

54. Representative Schock's Campaign Director had access to the 18th District Republican Central Committee's bank account and authority to make the contribution.[53]

55. Representative Schock's Campaign Director made a contribution of $25,000 from the 18th District Republican Central Committee's bank account to CPA via CPA's website.[54]

56. After the 18th District Republican Central Committee made the contribution online, CPA Development Coordinator learned that CPA's receipt of the contribution would be significantly delayed.[55] Specifically, CPA's vendor responsible for processing online

[48] *Id*.
[49] *Id*.
[50] *Id*. On March 14, 2012, Mr. Davis sent Representative Schock's Chief of Staff instructions on donating to CPA online and by bank wire. Email from Rodney Davis to Representative Schock's Chief of Staff, dated March 14, 2012 (Exhibit 14 at 12-9525_0115).
[51] Campaign Director MOI (Exhibit 11 at 12-9525_101). As stated in Part II.A, *supra*, a committee may contribute an unlimited amount to an IEOPC, such as CPA. The $5,000 limit applies to the amount *solicited* by the Federal officeholder, not the amount *contributed*.
[52] *Id*.
[53] *Id*.
[54] The Board notes the close nature of the relationship between the 18th District Republican Central Committee and Representative Schock's campaign and congressional staff. The initial $25,000 contribution from the 18th District Republican Central Committee was made without any apparent involvement of the committee's Treasurer or Chairman. Representative Schock's Campaign Director and Representative Schock's Chief of Staff appear to have had complete authority to make the contribution despite neither having a formal role with the committee. In addition, CPA apparently had no contact with the committee's Treasurer or Chairman except for a thank you note that Representative Schock's Campaign Director had forwarded to him based on his official role with the committee.
[55] CPA Managing Director MOI (Exhibit 4 at 12-9525_101); CPA Coordinator MOI (Exhibit 6 at 12-9525_0028).

contributions would not be able to deposit the payment into CPA's bank account until after the Illinois primary election.[56]

57. CPA Development Coordinator informed CPA Managing Director of the anticipated delay in receiving the contribution. As a result, CPA Managing Director instructed CPA Development Coordinator to contact Representative Schock's Campaign Director to request that the 18th District Republican Central Committee's $25,000 contribution be made by bank wire instead of online.[57]

58. According to Representative Schock's Campaign Director, she informed Representative Schock's Chief of Staff of the need for a wire transfer from the 18th District Republican Central Committee.[58]

59. She stated that Representative Schock's Chief of Staff then contacted the Chairman of the 18th District Republican Central Committee, Mr. Bigger, and asked him to wire $25,000 to CPA because neither Representative Schock's Chief of Staff nor his Campaign Director had authority to make bank wire transfers from the 18th District Republican Central Committee.[59]

[56] CPA Coordinator MOI (Exhibit 6 at 12-9525_0028).
[57] *Id*. CPA Development Coordinator and CPA Managing Director considered Representative Schock's Campaign Director to be the primary contact person for the 18th District Republican Central Committee. *See* Email from Jonathan Martin to CPA Development Coordinator, dated March 16, 2012 (Exhibit 15 at 12-9525_0117); Email from Representative Schock's Campaign Director to CPA Development Coordinator, dated March 14, 2012 (Exhibit16 at 12-9525_0120).
[58] Campaign Director MOI (Exhibit 11 at 12-9525_102).
[59] Campaign Director MOI (Exhibit 11 at 12-9525_102).

60. On March 16, 2012, the $25,000 bank wire transfer was made from the 18th District Republican Central Committee to CPA.[60] The original $25,000 contribution made online was refunded to the 18th District Republican Central Committee. The email below from CPA Development Coordinator to Representative Schock's Campaign Director references the refund of the original online contribution and CPA's receipt of the wire transfer.[61]

Subject: Wire Transfer Received
From: "Hannah Christian" <[redacted]@campaign4primaryaccountability.org>
Date: Fri, Mar 16, 2012 10:14 am
To: [redacted]@aaronschock.com

Good morning Tania,

Our accountant notified me that the $25,000 contribution was received this morning. I have asked Pyrix to refund the original contribution to the 18th Congressional District. I was told that they have a very slow process when it comes to refunding online gifts. Please let me know if you do not receive a refund by next Thursday. I will be more than happy to call them and see where the money is.

Thank you so much for all of your help.

Hannah

61. Representative Schock told the OCE that he has never requested that the 18th District Republican Central Committee contribute to any political campaigns. He also stated that he is not aware of his Campaign Director's involvement in any contributions that the 18th District Republican Central Committee made to other committees.[62]

62. CPA Development Coordinator stated that Representative Schock's Campaign Director was the contact person for the 18th District Republican Central Committee.[63]

63. Representative Schock told the OCE that he first learned of the 18th District Republican Central Committee's contribution to CPA approximately on March 10, 2012, when Mr. Bigger told him that the committee planned to make the contribution.[64]

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[60] CPA FEC Form 3x (Exhibit 7 at 12-9525_0036); Rodney Davis Email (Exhibit 5 at 12-9525_0024).
[61] Email from CPA Development Coordinator to Representative Shock's Campaign Director, dated March 16, 2012 (Exhibit 17 at 12-9525_0122).
[62] Representative Schock's Campaign Director is his sister. She told the OCE that she established the bank account for the 18th District Republican Central Committee's federal account and she routinely transfers money into the account from Representative Schock's joint fundraising committee. Campaign Director MOI (Exhibit 11 at 12-9525_101).
[63] CPA Coordinator MOI (Exhibit 6 at 12-9525_0028).
[64] Schock MOI (Exhibit 9 at 12-9525_0091).

64. Representative Schock's statements do not explain why Representative Schock's Chief of Staff and Representative Schock's Campaign Director made the initial $25,000 contribution from 18th District Central Republican Committee to CPA.

65. Representative Schock's Chief of Staff told the OCE that on or about March 11, 2012, Representative Schock had a conversation with Mr. Bigger where Mr. Bigger stated that the 18th District Republican Central Committee was going to contribute to CPA.[65] Representative Schock is the person who told Representative Schock's Chief of Staff about the conversation.[66]

66. Representative Schock's Chief of Staff stated that Mr. Bigger called him and asked for the information to make a wire transfer to CPA.[67] This statement conflicts with the statement of Representative Schock's Campaign Director who recalled that Representative Schock's Chief of Staff contacted Mr. Bigger and asked him to make the wire transfer. Also, Representative Schock's Chief of Staff did not disclose to the OCE any details regarding the initial request he made to Representative Schock's Campaign Director to make the $25,000 contribution.

67. Mr. Bigger refused to cooperate with the OCE. Paul Kilgore, Treasurer of the 18th District Republican Central Committee, also refused to cooperate.[68] As a result, the OCE was unable to obtain information from the 18th District Republican Central Committee concerning the circumstances of the contribution to CPA. Pursuant to Rule 6, and as explained in Part III, *infra*, the OCE draws a negative inference from the non-cooperation of Mr. Bigger and Mr. Kilgore.

E. <u>Representative Schock Asked Donor 1 to Contribute to CPA</u>

68. On or about March 11, 2012, Representative Schock called Donor 1 and asked if he could support CPA and its activities related to the Kinzinger/Manzullo race.[69]

[65] COS MOI (Exhibit 12 at 12-9525_106).
[66] *Id.*
[67] *Id.*
[68] Counsel for Mr. Bigger submitted a letter informing the OCE that Mr. Bigger declined to interview with the OCE and only had one document responsive to the OCE Request for Information. Counsel's letter also included a statement suggesting that Mr. Bigger decided to contribute $25,000 from 18th District Republican Central Committee to CPA and then informed Representative Schock of the decision. The OCE Board does not consider the representations of Mr. Bigger's attorney in this matter as evidence under H. Res. 895 of the 110th Congress §1(c)(2)(D) (as amended) and OCE Rule 4.
[69] Memorandum of Interview of Donor 1, July 25, 2012 ("Donor 1 MOI") (Exhibit 18 at 12-9525_0125); Schock MOI (Exhibit 9 at 12-9525_0092).

69. Donor 1 told Representative Schock on the call that he would support CPA and that he would ask others to help, as well.[70] Representative Schock told him that he would forward him the information to make the contribution to CPA.[71]

70. On March 14, 2012, Donor 1 received the information about CPA from Representative Schock's Chief of Staff in the email below.[72]

From: Steven Shearer <[redacted]@aol.com>
To: aaronschock <[redacted]@aol.com>; [redacted]@gmail.com>
Subject: Fwd: Contribution info, SUPER PAC Kinzinger-Manzullo
Date: Wed, Mar 14, 2012 3:07 pm
Attachments: CPA_prospectus_and_reply_form.pdf (510K), CPA_Wiring_Instructions.pdf (73K)

Can do an electronic check with the link below, or wire.

71. On March 14, 2012, Donor 1 contributed $35,000 to CPA.[73]

72. Donor 1 and Representative Schock both told the OCE that Representative Schock did not request a contribution of any particular amount from Donor 1.[74]

73. Donor 1 stated that he decided to contribute $35,000 because CPA Managing Director told him that there was a fundraising goal of $100,000 to be raised in three days.[75]

74. Donor 1 told the OCE that as a result of Representative Schock's request for contributions to CPA, Donor 1 solicited a contribution from Donor 2 to help reach the $100,000.[76]

75. On March 16, 2012, Donor 2 contributed $30,000 to CPA.[77] Donor 2 told the OCE that she contributed to CPA because Donor 1 requested that she contribute.[78]

[70] Schock MOI (Exhibit 9 at 12-9525_0092); Donor 1MOI (Exhibit 18 at 12-9525_0125).
[71] Donor 1MOI (Exhibit 18 at 12-9525_0125); Email from Representative Schock's Chief of Staff to Representative Schock and Donor 1, March 14, 2012. (Exhibit 19 at 12-9525_0128).
[72] Email from Representative Schock's Chief of Staff to Representative Schock and Donor 1, March 14, 2012. (Exhibit 19 at 12-9525_0128).
[73] CPA FEC Form 3X (Exhibit 7 at 12-9525_0038).
[74] Donor 1 MOI (Exhibit 18 at 12-9525_0125); Schock MOI (Exhibit 9 at 12-9525_0092).
[75] Donor 1 MOI (Exhibit 18 at 12-9525_0125).
[76] Donor 1 MOI (Exhibit18 at 12-9525_0125). Donor 1 also solicited contributions from John Canning and Ron Gidwitz. *Id.* Based on CPA FEC Form 3X, Mr. Canning and Mr. Gidwitz did not contribute to CPA.
[77] CPA FEC Form 3X (Exhibit 7 at 12-9525_0040).
[78] Memorandum of Interview of Donor 2, July 25, 2012 (Exhibit 20 at 12-9525_0131).

76. Donor 1 told the OCE that he did not ask Donor 2 to contribute any specific amount, but he did inform her that he was contributing $35,000.[79]

III. RODNEY DAVIS, ROB COLLINS, MICHAEL BIGGER, AND PAUL KILGORE REFUSED TO COOPERATE WITH THE OCE

77. Based on the nature of the allegation in this Review, the OCE requested information from witnesses who were identified as having knowledge of relevant facts.

78. All of the identified witnesses cooperated except the following: Rodney Davis; Rob Collins; Michael Bigger; and Paul Kilgore.

Rodney Davis

79. Mr. Davis is the former Budget Director of Representative John Shimkus and a former volunteer for Representative Shimkus' campaign committee.

80. CPA Managing Director identified Mr. Davis as the person with whom she was put into contact because he knew of potential donors to CPA for political ads opposing Representative Manzullo.

81. CPA Development Coordinator identified Mr. Davis as the contact person for the following donors: the 18th District Republican Central Committee ($25,000); ERIC PAC ($25,000); American College of Radiology PAC ($5,000); Donor 1 ($35,000); and Donor 2 ($30,000).

82. The OCE requested information from Mr. Davis to determine whether Representative Schock had any involvement in soliciting contributions in excess of $5,000 from these donors or any other potential donors.

83. Mr. Davis refused to cooperate with the OCE.

84. Pursuant to OCE Rule 6, the OCE draws a negative inference from Mr. Davis' refusal to cooperate with the OCE. The OCE infers that the information Mr. Davis refused to provide, taken together with the factual findings in this referral, supports the conclusion that there is substantial reason to believe that the alleged violation occurred.

[79] Donor 1 MOI (Exhibit 18 at 12-9525_0125).

Rob Collins

85. Mr. Collins is the former Chief of Staff for Representative 1. He is currently a partner with Purple Strategies, which provides services related to "corporate communications, reputation management and issue advocacy."[80]

86. Representative 1 identified Mr. Collins as the person with whom he put Representative Schock in contact because Mr. Collins could assist Representative Schock with raising funds for CPA.[81]

87. Lobbyist Donor 1 identified Mr. Collins as the person who put him in contact with CPA.[82] Lobbyist Donor 1 is a registered lobbyist for the American College of Radiology Association.

88. The email below shows Lobbyist Donor 1's request to have Mr. Collins credit Representative Schock for the American College of Radiology Association PAC contribution to CPA.[83]

From: Burnes, Ted [redacted]@acr.org]
Sent: Thursday, March 15, 2012 9:59 AM
To: [redacted]@purplestrategies.com
Cc: [redacted]@citizenleaderalliance.org
Subject: Re:

Who do we make check to? Is there a FEC Cmte ID#? We'll do $5k and credit Schock.

89. The OCE requested information from Mr. Collins to determine whether Representative Schock had any involvement in *soliciting* contributions in excess of $5,000 from this donor or any other potential donors.

90. Mr. Collins refused to cooperate with the OCE.

91. Pursuant to OCE Rule 6, the OCE draws a negative inference from Mr. Collins' refusal to cooperate with the OCE. The OCE infers that the information Mr. Collins refused to provide, taken together with the factual findings in this referral, supports the conclusion that there is a substantial reason to believe that the alleged violation occurred.

[80] Purpose of Purple Strategies, http://www.purplestrategies.com/purpose/.
[81] Representative 1 MOI (Exhibit 8_12-9525_0087).
[82] Memorandum of Interview of Lobbyist Donor 1, July 17, 2012 (Exhibit 21 at 12-9525_0134).
[83] Email from Lobbyist Donor 1 to Rob Collins, dated March 15, 2012 (Exhibit 22 at 12-9525_0138). *See also*, Additional Email from Rob Collins to Lobbyist Donor 1, dated March 15, 2012 (Exhibit 23 at 12-9525_0140).

Michael Bigger

92. Mr. Bigger is the Chairman of the 18th District Republican Central Committee.

93. The 18th District Republican Central Committee contributed $25,000 to CPA on March 16, 2012.

94. The OCE requested information from Mr. Bigger to determine whether Representative Schock had any involvement in soliciting contributions in excess of $5,000 from the 18th District Republican Central Committee or any other potential donors. The OCE also requested information to determine the involvement of Representative Schock's campaign in the 18th District Republican Central Committee's contribution of $25,000 to CPA.

95. Mr. Bigger refused to cooperate with the OCE.

96. Pursuant to OCE Rule 6, the OCE draws a negative inference from Mr. Bigger's refusal to cooperate with the OCE. The OCE infers that the information Mr. Bigger refused to provide, taken together with the factual findings in this referral, supports the conclusion that there is a substantial reason to believe that the alleged violation occurred.

Paul Kilgore

97. Mr. Kilgore is the Treasurer for the 18th District Republican Central Committee. He is also the Treasurer for Schock for Congress and Schock Victory Committee.

98. The 18th District Republican Central Committee contributed $25,000 to CPA on March 16, 2012.

99. The OCE requested information from Mr. Kilgore to determine whether Representative Schock had any involvement in soliciting contributions in excess of $5,000 from the 18th District Republican Central Committee or any other potential donors.

100. Mr. Kilgore refused to cooperate with the OCE.

101. Pursuant to OCE Rule 6, the OCE draws a negative inference from Mr. Kilgore's refusal to cooperate with the OCE. The OCE infers that the information Mr. Kilgore refused to provide, taken together with the factual findings in this referral, supports the conclusion that there is a substantial reason to believe that the alleged violations in this Review occurred.

IV. CONCLUSION

102. Based on the information before the OCE, the Board finds that Representative Schock solicited Representative 1 to contribute $25,000 to CPA.

103. In addition, the Board finds that there is substantial reason to believe that Representative Schock's campaign committee solicited the 18th District Republican Central Committee to contribute $25,000 to CPA.

104. For the foregoing reasons, the Board of the Office of Congressional Ethics recommends that the Committee on Ethics further review the above allegation because there is substantial reason to believe that Representative Schock solicited contributions for an independent expenditure-only political committee in excess of $5,000 per donor, in violation of 2 U.S.C. § 441i(e)(1)(A), House Rule 23, clause 1, and the Code of Ethics for Government Service, ¶ 2.

V. INFORMATION THE OCE WAS UNABLE TO OBTAIN AND RECOMMENDATIONS FOR THE ISSUANCE OF SUBPOENAS

105. The following witnesses, by declining to provide documentary and testimonial evidence in response to the OCE's Requests for Information, did not cooperate with the OCE's review.

    a. Michael Bigger, Chairman, 18th District Republican Central Committee;

    b. Rob Collins, Partner, Purple Strategies LLC;

    c. Rodney Davis, former staffer of Representative John Shimkus; and

    d. Paul Kilgore, Treasurer, 18th District Republican Central Committee.

106. As a result, the OCE was unable to obtain certain information regarding whether Representative Schock solicited certain contributions in excess of $5,000 per donor.

107. The Board recommends the issuance of subpoenas to Michael Bigger, Rob Collins, Rodney Davis, and Paul Kilgore.

EXHIBIT 1

FEDERAL ELECTION COMMISSION
Washington, DC 20463

June 30, 2011

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

ADVISORY OPINION 2011-12

Marc E. Elias, Esq.
Ezra W. Reese, Esq.
Jonathan S. Berkon, Esq.
Perkins Coie LLP
700 Thirteenth St., NW, Suite 600
Washington, DC 20005-3960

Dear Messrs. Elias, Reese, and Berkon:

We are responding to your advisory opinion request on behalf of Majority PAC (formerly known as Commonsense Ten) and House Majority PAC (the "Committees"), concerning the application of the Federal Election Campaign Act of 1971, as amended (the "Act"), and Commission regulations, to the Committees' plan to ask Federal officeholders and candidates, and officers of national party committees, to solicit unlimited individual, corporate, and labor organization contributions on behalf of the Committees. The Commission concludes that Federal officeholders and candidates, and officers of national party committees, remain subject to the Act's amount limitations and source prohibitions when they solicit contributions on behalf of the Committees. Additionally, the Commission concludes that Federal officeholders and candidates, and national party officers, may attend, speak at, and be featured guests at fundraisers for the Committees at which unlimited individual, corporate, and labor organization contributions are solicited, so long as they restrict any solicitation they make to funds subject to the limitations, prohibitions and reporting requirements of the Act.

Background

The facts presented in this advisory opinion are based on your letter received on May 19, 2011, materials submitted in connection with Advisory Opinion 2010-11 (Commonsense Ten), and on publicly available reports filed with the Commission.

On June 11, 2010, Majority PAC, under its previous name, Commonsense Ten, filed its Statement of Organization.[1] On the same day, it filed an Advisory Opinion Request with the Commission regarding its planned activities. In its 2010 request, Majority PAC represented that it planned to pay for independent expenditures but that it would not make any direct or in-kind contributions to Federal candidates, political party committees, or to any other political committee that makes contributions to Federal candidates or party committees. Advisory Opinion Request 2010-11 (Commonsense Ten) at 3. Majority PAC also stated that it would solicit and accept contributions from corporations and labor organizations, as well as from individuals and Federal political committees in excess of $5,000 per calendar year. *Id.* It would not, however, solicit or accept contributions from foreign nationals, Federal contractors, or national banks or corporations organized by any law of Congress. *Id.* Majority PAC also stated that it would report all contributions aggregating in excess of $200 a year to the Commission. *Id.* On July 22, 2010, the Commission approved the proposal in Advisory Opinion 2010-11 (Commonsense Ten). On July 27, 2010, Majority PAC filed a letter with the Commission stating that it intended to make independent expenditures and raise funds in unlimited amounts, but that it would not make any contributions to Federal candidates or to Federal political committees, whether direct, in-kind, or by means of coordinated communications.[2]

On April 11, 2011, House Majority PAC filed its Statement of Organization. On the same day, House Majority PAC filed a letter stating that it intended to make independent expenditures and raise funds in unlimited amounts, but that it would not make any contributions to Federal candidates or to Federal political committees, whether direct, in-kind, or by means of coordinated communications.

Both Committees represent that they have solicited and accepted contributions in accordance with Advisory Opinion 2010-11 (Commonsense Ten), and that they report these contributions to the Commission. Both Committees have filed the required disclosure reports, and these reports are available on the Commission's website.

Questions Presented

1. May Federal officeholders and candidates, and officers of national party committees, solicit unlimited contributions from individuals, corporations, and labor organizations on behalf of political committees that make only independent expenditures?

2. If the answer to Question One is no, may Federal officeholders and candidates, and officers of national party committees, participate in fundraisers for such political committees, at which unlimited individual, corporate, and labor organization

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[1] On March 9, 2011, Majority PAC filed an amended Statement of Organization indicating a name change from Commonsense Ten to Majority PAC.

[2] The Commission approved the use of a template for this type of letter in Advisory Opinion 2010-09 (Club for Growth).

contributions will be solicited, so long as the officeholders, candidates, and officers do not themselves solicit such contributions?

Legal Analysis and Conclusions

1. May Federal officeholders and candidates, and officers of national party committees, solicit unlimited contributions from individuals, corporations, and labor organizations on behalf of political committees that make only independent expenditures?

No, Federal officeholders, candidates, and officers of national party committees may not solicit unlimited contributions from individuals, corporations, or labor organizations on behalf of independent expenditure-only political committees ("IEOPCs"). However, Federal officeholders and candidates, and officers of national party committees, may solicit up to $5000 from individuals (and any other source not prohibited by the Act from making a contribution to a political committee) on behalf of an IEOPC, because those funds are subject to the Act's amount limitations and source prohibitions.[3]

The Act limits contributions by any person to "any other political committee" (other than authorized candidate committees, and national and state party committees) to $5000 per calendar year. 2 U.S.C. 441a(a)(1)(C). Furthermore, national banks, corporations, labor organizations, Federal contractors, and foreign nationals are prohibited from making any contribution in connection with any Federal election. 2 U.S.C. 441b(a), 441c, 441e.

On January 21, 2010, the U.S. Supreme Court held in *Citizens United* that corporations may make unlimited independent expenditures and electioneering communications using corporate treasury funds. *Citizens United v. FEC*, 558 U.S. __, 130 S.Ct. 876, 913 (2010). On March 26, 2010, shortly after the *Citizens United* decision, the U.S. Court of Appeals for the District of Columbia Circuit held that the Act's contribution limits are unconstitutional as applied to individuals' contributions to political committees that make only independent expenditures. *SpeechNow.org v. FEC*, 599 F.3d 686, 696 (D.C. Cir. 2010) (*en banc*). Consistent with the *Citizens United* and *SpeechNow* opinions, the Commission concluded that corporations, labor organizations, political committees, and individuals may each make unlimited contributions to IEOPCs, and that these IEOPCs may solicit unlimited contributions from these sources. Advisory Opinion 2010-11 (Commonsense Ten). The Committees have registered as IEOPCs, and therefore may accept unlimited contributions from individuals, political committees, corporations, and labor organizations.

However, Federal officeholders and candidates, their agents, and entities directly or indirectly established, financed, or maintained, or controlled by, or acting on behalf of, Federal officeholders and candidates, may not raise or spend funds in connection with an election for Federal office, "unless the funds are subject to the limitations, prohibitions,

[3] *See* 2 U.S.C. 441i(e)(1)(A); 11 CFR 300.61.

and reporting requirements" of the Act. 2 U.S.C. 441i(e)(1)(A); 11 CFR 300.61. Persons subject to section 441i(e) also may not raise or spend funds in connection with any election other than an election for Federal office unless the funds are raised within the Act's contribution limits and are not from prohibited sources. 2 U.S.C. 441i(e)(1)(B); 11 CFR 300.62. Similarly, national party committees, their officers and agents, and any entity that is directly or indirectly established, financed, maintained, or controlled by a national party committee or a national congressional campaign committee, may not solicit, receive, direct or spend "any funds [] that are not subject to the limitations, prohibitions, and reporting requirements of the Act." 2 U.S.C. 441i(a)(1); 11 CFR 300.10(a).

Section 441i was enacted by Congress long after the Act's contribution limits and source prohibitions.[4] It was upheld by the Supreme Court in *McConnell v. FEC*, 540 U.S. 93, 181-184 (2003), and remains valid since it was not disturbed by either *Citizens United* or *SpeechNow*. *See, e.g.*, *RNC v. FEC*, 698 F. Supp. 2d 150, 156-60 (D.D.C. 2010), *aff'd* 130 S. Ct. 3544 (2010).

It is clear that under *Citizens United*, the Committees may *accept* unlimited contributions from individuals, corporations, and labor organizations; however, the Act's solicitation restrictions remain applicable to *contributions solicited by* Federal candidates, officeholders, and national party committees and their agents. Thus, Federal candidates, officeholders, and national party committees and their agents may only solicit contributions of up to $5000 from individuals (other than foreign nationals or Federal contractors) and Federal political action committees for an IEOPC.

2. If the answer to Question One is no, may Federal officeholders and candidates, and officers of national party committees, participate in fundraisers for such political committees, at which unlimited individual, corporate, and labor organization contributions will be solicited, so long as the officeholders, candidates, and officers do not themselves solicit such contributions?

Yes, Federal officeholders and candidates, and officers of national party committees, may attend, speak at, or be featured guests at fundraisers for the Committees, at which unlimited individual, corporate, and labor organization contributions will be solicited, so long as the officeholders, candidates, and officers of national party committees restrict any solicitations they make to funds subject to the limitations, prohibitions, and reporting requirements of the Act.

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[4] Congress passed the solicitation prohibition at 2 U.S.C. 441i as part of the 2002 Bipartisan Campaign Reform Act of 2002 ("BCRA").

In April 2010, the Commission adopted revised regulations covering "participation by Federal candidates and officeholders at fundraising events in connection with an election for Federal office . . . at which funds outside the amount limitations and source prohibitions of the Act or Levin funds are solicited." 11 CFR 300.64(a).[5] Under the revised regulations, a Federal candidate or officeholder may "[a]ttend, speak at, or be a featured guest" at such a fundraising event. 11 CFR 300.64(b)(1). In the course of participating in such an event, however, a Federal candidate or officeholder may not solicit any funds that are not "subject to the limitations, prohibitions, and reporting requirements of the Act." 11 CFR 300.61. Rather, a Federal candidate or officeholder who solicits funds at such an event must limit any solicitation "to funds that comply with the amount limitations and source prohibitions of the Act." 11 CFR 300.64(b)(2).

This response constitutes an advisory opinion concerning the application of the Act and Commission regulations to the specific transaction or activity set forth in your request. *See* 2 U.S.C. 437f. The Commission emphasizes that, if there is a change in any of the facts or assumptions presented, and such facts or assumptions are material to a conclusion presented in this advisory opinion, then the requestor may not rely on that conclusion as support for its proposed activity. Any person involved in any specific transaction or activity which is indistinguishable in all its material aspects from the transaction or activity with respect to which this advisory opinion is rendered may rely on this advisory opinion. *See* 2 U.S.C. 437f(c)(1)(B). Please note the analysis or conclusions in this advisory opinion may be affected by subsequent developments in the law including, but not limited to, statutes, regulations, advisory opinions, and case law. The cited advisory opinions are available on the Commission's website, www.fec.gov, or directly from the Commission's Advisory Opinion searchable database at http://www.fec.gov/searchao.

On behalf of the Commission,

(signed)
Cynthia L. Bauerly
Chair

[5] *See also Final Rules for 11 CFR 300.64: Participation by Federal Candidates and Officeholders at Non-Federal Fundraising Events*, 75 FR 24375 (May 5, 2010), available at www.fec.gov/fosers.

EXHIBIT 2

Appendix E. Fundraising by Federal Candidates and Officeholders

Prohibition

The *Federal Election Campaign Act* (the *Act*) and Commission regulations restrict the ability of federal candidates and officeholders to raise funds. Specifically, federal candidates and officeholders, their agents and entities established, financed, maintained or controlled by them, may not solicit,[1] receive, direct,[2] transfer, spend or disburse funds in connection with a federal election, including funds for federal election activity, unless the funds are within the *Act*'s limits, prohibitions and reporting requirements. 300.61.

In addition, federal candidates and officeholders may solicit, receive, direct, transfer, spend or disburse funds in connection with a nonfederal election only in amounts and from sources that are consistent with state law and that do not exceed the *Act*'s contribution limits or come from prohibited sources. 300.62.

The *Act* and Commission regulations provide for exceptions and clarifications to these general prohibitions, as discussed below.

1. Fundraising for State/Local Candidates and Elections

Nonfederal Elections

A federal candidate, officeholder or his or her agents, and any entity directly or indirectly established, financed, maintained or controlled by, or acting on behalf of, one or more federal candidates or officeholders, may raise funds in connection with a nonfederal election, but only in amounts consistent with state law and that do not exceed the *Act*'s contribution limits or come from prohibited sources.[3] 300.62; See also 300.64(b)(2).[4]

Ballot Initiatives

In AO 2010-07, the Commission concluded that Members of Congress could solicit funds outside the *Act*'s limits and prohibitions on behalf of a California ballot initiative committee, Yes on FAIR, during the time before the initiative qualified for the ballot, and afterward could solicit up to $20,000 from individuals on behalf of the committee. For additional information on ballot initiatives, see AOs 2007-28, 2006 -04, 2005-10, 2004-29 and 2003-12.

1 To solicit means to ask, request or recommend, explicitly or implicitly, that another person make a contribution, donation, transfer of funds or otherwise provide anything of value. A solicitation is an oral or written communication that, construed as reasonably understood in the context in which it is made (including the conduct of the persons involved), contains a clear message asking, requesting or recommending that another person make a contribution, donation, transfer of funds or otherwise provide anything of value. A solicitation may be made directly or indirectly, and does not include mere statements of political support or mere guidance as to the applicability of a particular law or regulation. 300.2(m). See the regulations at 300.2(m)(1)-(3) for examples of communications and statements that do or do not constitute solicitations.

2 To direct means to guide, directly or indirectly (through a conduit or intermediary), a person who has expressed an intent to make a contribution, donation, transfer of funds or otherwise provide anything of value, by identifying a candidate, political committee or organization for the receipt of such funds or things of value. Direction does not include merely providing information or guidance as to the applicability of a particular law or regulation. 300.2(n).

3 See 300.2(b) and (c) for a list of the factors considered by the Commission in determining whether an entity is directly or indirectly established, financed, maintained or controlled by, or acting on behalf of, a federal candidate, officeholder or agent. See also AOs 2006-04, 2005-02 and 2004-33.

4 Please note that the Commission superseded the second paragraph in the answer to Question 2 in AO 2005-02. See the Explanation and Justification to rules on participation by federal candidates and officeholders at nonfederal fundraising events, prescribed June 4, 2010, 75 Fed. Reg. 24375 (May 5, 2010).

12-9525_0008

Candidates Who Run for Both Federal and Nonfederal Office

Commission regulations provide a limited exception for federal candidates and officeholders who seek state or local office. The restrictions on raising and spending funds outside the *Act*'s limitations and prohibitions do not apply to any federal candidate or officeholder who is or was also a candidate for state or local office so long as the raising or spending of funds is 1) solely in connection with his or her state or local campaign; 2) refers only to him or her or to other candidates for that same state or local office; and 3) is permitted under state law. 300.63.

If the candidate or officeholder is simultaneously running for both federal and state or local offices, then the candidate or his or her agents may only raise and spend funds within the limits, prohibitions and reporting requirements of the *Act* for the federal election. 300.63; See also AOs 2007-01, 2005-12 and 2005-02.[5]

2. Nonfederal Fundraising Events

Participation at Nonfederal Fundraising Events

A federal candidate or officeholder may attend, speak at and be a featured guest at a nonfederal fundraiser. 300.64(b)(1). He or she is also free to solicit funds at the fundraising event, provided that the solicitation for funds is within the limitations and prohibitions of the *Act* and consistent with state law. 300.64(b)(2).

Such a solicitation should either be explicitly limited or should be limited by displaying at the fundraiser a clear and conspicuous written notice, or by making a clear and conspicuous oral statement, that the solicitation is not for Levin funds (when applicable) and does not seek funds in excess of federally permissible amounts or from corporations, labor organizations, national banks, federal government contractors and foreign nationals. 300.64(b)(2)(i-ii). If the federal candidate or officeholder chooses to make an oral statement, it need only be made once.

Publicity for Nonfederal Fundraising Events

FEC regulations also address the publicity for nonfederal fundraisers including, but not limited to, ads, announcements or pre-event invitation materials, regardless of format or medium of the communication. 300.64(c)

If the publicity does not contain a solicitation or solicits only federally permissible funds, then the federal candidate or officeholder (or agent of either) is free to consent to the use of the name or likeness of the federal candidate or officeholder in the publicity for the nonfederal fundraiser. 300.64(c)(1)-(2).

If the publicity contains a solicitation for funds outside the limitations or prohibitions of the *Act* or Levin funds, the federal candidate or officeholder (or agent of either) may consent to the use the name or likeness of the federal candidate or officeholder in the publicity, only if:

- The federal candidate or officeholder is identified in a manner not specifically related to fundraising, such as a featured guest, honored guest, special guest, featured speaker or honored speaker; and
- The publicity includes a clear and conspicuous oral or written disclaimer that the solicitation is not being made by the federal candidate or officeholder. 300.64(c)(3)(i). Examples of disclaimers are provided in the regulation at 300.64(c)(3)(iv).

However, a federal candidate or officeholder (or agent of either) may not agree to the use of his or her name or likeness in publicity that contains a solicitation of funds outside the limitations and prohibitions of the *Act* or of Levin funds if:

The federal candidate or officeholder is identified as serving in a manner specifically related

5 Please note that the Commission superseded the second paragraph in the answer to Question 2 in AO 2005-02. See the Explanation and Justification to rules on participation by federal candidates and officeholders at nonfederal fundraising events, prescribed June 4, 2010, 75 Fed. Reg. 24375 (May 5, 2010).

to fundraising, such as honorary chairperson or member of a host committee; or is identified in the publicity as extending the invitation to the event; or

- The federal candidate or officeholder signs the communication.
- These restrictions apply even if the publicity contains a disclaimer. 300.64(c)(3)(v).

In addition, the federal candidate or officeholder is prohibited from disseminating publicity for nonfederal fundraisers that contains a solicitation of funds outside the limitations or prohibitions of the *Act* or of Levin funds. 300.64(c)(3)(vi).

3. Supporting Independent Expenditure Only Political Committees

Political committees that make only independent expenditures may solicit and accept unlimited contributions from individuals, corporations, labor organizations and other political committees. They may not accept contributions from foreign nationals, federal contractors, national banks or federally chartered corporations. See AO 2010-11. Such committees, known as Independent Expenditure Only Political Committees or IEOPCs, must register with the Commission and comply with all applicable reporting requirements of the *Act*. See also *Citizens United v. FEC*, 130 S. Ct. 876, 913 (2010) and *SpeechNow.org v. FEC*, 599 F. 3d 686 (D.C. Cir. 2010).

Federal candidates and officeholders may raise funds on behalf of IEOPCs so long as they only solicit funds subject to the *Act*'s amount limitations and source prohibitions—i.e. up to $5000 from individuals (and any other source not prohibited by the *Act* from making a contribution to a political committee). Additionally, federal candidates and officeholders may attend, speak at and be featured guests at fundraisers for IEOPCs at which unlimited individual, corporate and labor organization contributions are solicited, so long as they restrict any solicitation they make to funds subject to the limitations, prohibitions and reporting requirements of the *Act*. AO 2011-12. See 300.64(b)(1) and (2).

4. Supporting Tax-Exempt Organizations

General Rule for Solicitations

A federal candidate, officeholder or his or her agents may make solicitations for certain tax-exempt organizations. The regulations regarding solicitation for tax-exempt organizations differ depending on whether the funds solicited will be used for certain federal election activities and whether the organization's principal purpose is to conduct federal election activity.

Limits and Prohibitions on Solicitations

General Solicitations

A federal candidate or officeholder (or individual acting on behalf of either) may make a general solicitation on behalf of a 501(c) tax-exempt organization, or an organization that has applied for this tax status, without limits on the source or amount of funds, if

- The organization does not engage in activities in connection with elections, or
- It is not the principal purpose of the organization to conduct election activities, including certain federal election activity, and
- The solicitation is not to obtain funds for activities in connection with an election, including certain federal election activity. 300.65(a) and (c).

Specific Solicitations for Federal Election Activity

A federal candidate or officeholder (or individual acting on behalf of either) may also make a specific solicitation explicitly to obtain funds to pay for federal election activities conducted by or for a tax-exempt organization whose principal purpose is to undertake such activities. The federal election activities for which such a specific solicitation may be made are limited to:

- Voter registration activity during the period that begins 120 days before the date of a regularly scheduled federal election and ends on the day of that election; and

- Voter identification, get-out-the vote or generic campaign activity conducted in connection with an election in which a federal candidate appears on the ballot (regardless of whether a state or local candidate also appears on the ballot). See 100.24, 100.25 and 300.65(c).

When making specific solicitations for a tax-exempt organization, the candidate may solicit only individuals and may solicit no more than $20,000 per calendar year from each contributor. 300.65(b).

General Prohibition

Federal law permits solicitations by federal candidates and officeholders only for the specific federal election activities listed above; these individuals must not make any solicitations on behalf of a 501(c) organization, or an organization that has applied for this tax status, for any other types of election activities, such as public communications promoting, supporting, attacking or opposing federal candidates. 300.65(d).

Safe Harbor

To determine whether a 501(c) organization is not one whose principal purpose is to conduct election activities, such as those outlined in the above two paragraphs, a federal candidate or officeholder or their agent may obtain and rely upon a written certification, signed by an officer or other authorized representative of the organization with knowledge of the organization's activities, stating that:

- It is not the organization's principal purpose to engage in election activities, including the types of election activity described above; and
- The organization does not intend to pay debts incurred from expenditures or disbursements in connection with an election for federal office (including for federal election activities) in a prior election cycle.

If the federal candidate or officeholder (or an agent of either) has actual knowledge that the certification is false, then the certification may not be relied upon.

300.65(e) and (f).

EXHIBIT 3

Campaign for Primary Accountability, Inc.
3900 Essex Lane, Suite 575
Houston, Texas 77027

RECEIVED
2011 SEP 29 AM 11:35
FEC MAIL CENTER

September 27th, 2011

Federal Election Commission
999 E Street, NW
Washington, DC 20463

Via Hand Delivery

11030664262

Re: Form 1, Statement of Organization—Unlimited Contributions

To Whom It May Concern:

The Campaign for Primary Accountability, Inc. intends to make independent expenditures, and consistent with the U.S. Court of Appeals for the District of Columbia Circuit decision in *SpeechNow v. FEC*, it therefore intends to raise funds in unlimited amounts. This committee will not use those funds to make contributions, whether direct, in-kind, or via coordinated communications, to federal candidates or committees. Enclosed please find the committee's Form 1 Statement of Organization.

Respectfully submitted,

Jonathan Martin
Treasurer

enclosure

FEC FORM 1

STATEMENT OF ORGANIZATION

RECEIVED
2011 SEP 29 AM 11:35
FEC MAIL CENTER

Office Use Only

1. NAME OF COMMITTEE (in full) ☐ (Check if name is changed) Example: If typing, type over the lines. 12FE4M5

Campaign for Primary Accountability, Inc.

ADDRESS (number and street) 3900 Essex Lane, Suite 575

☐ (Check if address is changed)

Houston, TX 77027 -

CITY STATE ZIP CODE

COMMITTEE'S E-MAIL ADDRESS (Please provide only one e-mail address)

☐ (Check if address is changed) [redacted]@ceterusinc.com

COMMITTEE'S WEB PAGE ADDRESS (URL)

☐ (Check if address is changed)

2. DATE 09 / 27 / 2011

3. FEC IDENTIFICATION NUMBER C

4. IS THIS STATEMENT ☒ NEW (N) OR ☐ AMENDED (A)

I certify that I have examined this Statement and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer Jonathan Martin

Signature of Treasurer [signature] Date 09 / 27 / 2011

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. §437g.

ANY CHANGE IN INFORMATION SHOULD BE REPORTED WITHIN 10 DAYS.

Office Use Only				

For further information contact:
Federal Election Commission
Toll Free 800-424-9530
Local 202-694-1100

FEC FORM 1
(Revised 02/2009)

11030664263

12-9525_0014

5. TYPE OF COMMITTEE

Candidate Committee:

(a) ☐ This committee is a principal campaign committee. (Complete the candidate information below.)

(b) ☐ This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)

Name of Candidate

Candidate Party Affiliation

Office Sought: ☐ House ☐ Senate ☐ President

State

District

(c) ☐ This committee supports/opposes only one candidate, and is NOT an authorized committee.

Name of Candidate

Party Committee:

(d) ☐ This committee is a (National, State or subordinate) committee of the (Democratic, Republican, etc.) Party.

Political Action Committee (PAC):

(e) ☐ This committee is a separate segregated fund. (Identify connected organization on line 6.) Its connected organization is a:

☐ Corporation ☐ Corporation w/o Capital Stock ☐ Labor Organization

☐ Membership Organization ☐ Trade Association ☐ Cooperative

☐ In addition, this committee is a Lobbyist/Registrant PAC.

(f) ☒ This committee supports/opposes more than one Federal candidate, and is NOT a separate segregated fund or party committee. (i.e., nonconnected committee)

☐ In addition, this committee is a Lobbyist/Registrant PAC.

☐ In addition, this committee is a Leadership PAC. (Identify sponsor on line 6.)

Joint Fundraising Representative:

(g) ☐ This committee collects contributions, pays fundraising expenses and disburses net proceeds for two or more political committees/organizations, at least one of which is an authorized committee of a federal candidate.

(h) ☐ This committee collects contributions, pays fundraising expenses and disburses net proceeds for two or more political committees/organizations, none of which is an authorized committee of a federal candidate.

Committees Participating in Joint Fundraiser

1. FEC ID number C

2. FEC ID number C

3. FEC ID number C

4. FEC ID number C

11030664264

Write or Type Committee Name

Campaign for Primary Accountability, Inc.

6. Name of Any Connected Organization, Affiliated Committee, Joint Fundraising Representative, or Leadership PAC Sponsor

None

Mailing Address

CITY STATE ZIP CODE

Relationship: ☐ Connected Organization ☐ Affiliated Committee ☐ Joint Fundraising Representative ☐ Leadership PAC Sponsor

11030664265

7. **Custodian of Records:** Identify by name, address (phone number -- optional) and position of the person in possession of committee books and records.

Full Name: Jonathan Martin

Mailing Address: 1739 Maybank Highway
Suite T-346
Charleston SC 29412

CITY STATE ZIP CODE

Title or Position: Treasurer

Telephone number: 828 - 777 - [redacted]

8. **Treasurer:** List the name and address (phone number -- optional) of the treasurer of the committee; and the name and address of any designated agent (e.g., assistant treasurer).

Full Name of Treasurer: Jonathan Martin

Mailing Address: 1739 Maybank Highway
Suite T-346
Charleston SC 29412

CITY STATE ZIP CODE

Title or Position: Treasurer

Telephone number: 828 - 777 - [redacted]

Full Name of Designated Agent

Mailing Address

CITY STATE ZIP CODE

Title or Position

Telephone number

9. **Banks or Other Depositories:** List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of Bank, Depository, etc.

Bank of America

Mailing Address 3904 Richmond Ave.

Houston TX 77027

CITY STATE ZIP CODE

Name of Bank, Depository, etc.

Mailing Address

CITY STATE ZIP CODE

11030664266

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.

☑ Hand Delivered	Date of Receipt 9/29/11
☐ USPS First Class Mail	Postmarked
☐ USPS Registered/Certified	Postmarked (R/C)
☐ USPS Priority Mail	Postmarked
Delivery Confirmation™ or Signature Confirmation™ Label ☐	
☐ USPS Express Mail	Postmarked
☐ Postmark Illegible	
☐ No Postmark	
☐ Overnight Delivery Service (Specify):	Shipping Date
Next Business Day Delivery ☐	
☐ Received from House Records & Registration Office	Date of Receipt
☐ Received from Senate Public Records Office	Date of Receipt
☐ Received from Electronic Filing Office	Date of Receipt
☐ Other (Specify):	Date of Receipt or Postmarked
PREPARER	9/29/11 DATE PREPARED

(3/2005)

11030664267

12-9525_0018

EXHIBIT 4

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

OFFICE OF CONGRESSIONAL ETHICS
UNITED STATES HOUSE OF REPRESENTATIVES

MEMORANDUM OF INTERVIEW

IN RE:	CPA Managing Director
REVIEW NO.:	12-9525
DATE:	July 12, 2012
LOCATION:	1101 Connecticut, NW Washington, DC 20005
TIME:	1:03 p.m. to 1:49 p.m. (approximately)
PARTICIPANTS:	Kedric L. Payne Paul J. Solis Lee Goodman

SUMMARY: The witness is the Managing Director of Development for Campaign for Primary Accountability ("CPA"). The OCE requested an interview with the witness on July 12, 2012, and she consented to an interview. The witness made the following statements in response to our questioning:

1. The witness was given an 18 U.S.C. § 1001 warning and consented to an interview. She signed a written acknowledgement of the warning, which will be placed in the case file in this review.

2. The witness is the Managing Director of Development for CPA and works in Austin, Texas. She is also the Managing Director of Development for the Alliance for Self Governance ("ASG").

3. She is the President of Citizen Leader Alliance ("CLA").

4. The witness told the OCE that CLA, ASG, and CPA do not have any formal relationship, but the entities share many of the same employees.

5. She stated that the CPA Co-Chairmen are Leo Linbeck and Eric O'Keefe. The Chief of Staff is Michael Barnhart. The witness reports to Mr. Barnhart.

6. The CPA staffers are divided among three groups: fundraising, communications, and the political team. The witness and Hannah Christian are the only staff in the fundraising group. Kelly O'Keefe is in the communications group.

7. When asked to describe her job duties related to fundraising, the witness stated that she calls prospective donors, build relationships with the donors, and updates donors on CPA activities. She is not certain, but believes that she has sent direct mail to potential donors.

8. She stated that her fundraising telephone calls are made to people that the Co-Chairmen identify. She does not make cold calls and she does not believe that Ms. Christian makes cold calls.

9. The witness also fundraises for CLA and ASG. She told the OCE that Ms. Christian also fundraises for ASG.

10. The witness is not involved in deciding how CPA spends its funds for elections. She also is not involved in compiling records for CPA's reports filed with the Federal Election Commission.

11. She does not personally know Representative John Shimkus or his staffers.

12. She described Rodney Davis as her main contact for contributions that CPA received for the Representative Kinzinger race. She told the OCE that in March 2012, she spoke with Eric O'Keefe and he told her to call Mr. Davis because he knew of individuals who would contribute to CPA's efforts in Representative Kinzinger's election. She recalled that she called Mr. Davis and provided him with wiring instructions for contributions.

13. The witness stated that she did not ask Mr. Davis for the contribution or for a specific amount of money. She did not know whether Eric O'Keefe asked for the contribution or Mr. Davis offered to contribute.

14. The witness was shown an email from Mr. Davis to her dated March 16, 2012 (CPA 000019). She told the OCE that the email refers to a $25,000 contribution from the 18th District Republican Central Committee that was initially made online. The online contribution was rescinded because Ms. Christian informed the witness that the online contribution would not credit to the CPA bank account before election day in the Representative Kinzinger race due to a delay with CPA's online contribution vendor.

15. She stated that Mr. Davis put her in contact with someone at the 18th District Republican Central Committee who wired the contribution to CPA. The witness was familiar with the name of the Committee but not who they were. The witness does not know if there is any affiliation between Representative Aaron Schock and the 18th District Republican Central Committee.

16. She recalled that Mr. Davis' statement in the email "that puts you at $90,000 already wired," referred to various donors who contributed to CPA.

17. She did not know what the following statement was regarding: "$10,000 more may have been wired today from Canning." She did have any knowledge of Canning.

18. The witness told the OCE that Mr. Davis wanted confirmation that CPA spent $100,000 on Representative Kinzinger's race. She stated that Mr. Davis had the understanding that the contributions would be spent on Representative Kinzinger's race before she was first put in contact with him. She is not sure how he came to have this understanding.

19. When shown a copy of Schedule A of CPA's FEC Report covering activity in March 2012, the witness identified the following as entities where Mr. Davis was her contact: 18th District Republican Central Committee; American College of Radiology.

20. The witness told the OCE that she last communicated with Mr. Davis by email to congratulate him on the win in the primary.

21. The witness does not personally know Representative Aaron Schock or Steve Shearer. She does not personally know Representative Cantor.

22. The witness does not know Ted Burnes. When shown an email from Ted Burnes to Rob Collins, dated March 15, 2012 (CPA000017), the witness stated that she does not know the meaning of the email because she was copied on the email. She does not know the significance of the statement in the email "We'll do $5k, and credit Schock." She told the OCE that CPA does not credit contributions to certain people.

23. The witness does not know Tania Hoerr, but she believes that Mr. Davis put her in contact with Ms. Hoerr. She believes Ms. Hoerr was the contact for the 18th District Central Republican Committee. The witness has no understanding of the relationship between the 18th District Central Republican Committee and Representative Schock's campaign.

24. The witness stated that she does not know whether Rob Collins has an affiliation with CPA.

25. She told the OCE that she performed searches of her files in response to the OCE Request for Information and she did not withhold any documents.

This memorandum was prepared on July 13, 2012, based on the notes that the OCE staff prepared during the interview with the witness on July 12, 2012. I certify that this memorandum contains all pertinent matter discussed with the witness on July 12, 2012.

Kedric L. Payne
Deputy Chief Counsel

EXHIBIT 5

From: Rodney Davis <[redacted]@volunteersforshimkus.org>
Subject: Re: Out of office
Date: March 16, 2012 2:27:18 PM CDT
To: Jamie Story <[redacted]@citizenleaderalliance.org>
Cc: "Eric O'Keefe" <[redacted]@mhtc.net>

Jamie, the 25k echeck yesterday was rescinded, and the money was wired today from the 18th Congressional District PAC. That puts you at $90,000 already wired. $10,000 more may have been wired today from Canning, but I am not sure there. Have John get me a copy of the buy that shows at least $100,000 being spent on Rockford TV and any cable outlets you have added. Thx.

EXHIBIT 6

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

OFFICE OF CONGRESSIONAL ETHICS
UNITED STATES HOUSE OF REPRESENTATIVES

MEMORANDUM OF INTERVIEW

IN RE:	CPA Development Coordinator
REVIEW NO.:	12-9525
DATE:	July 12, 2012
LOCATION:	1101 Connecticut, NW Washington, DC 20005
TIME:	12:10 p.m. to 12:49 p.m. (approximately)
PARTICIPANTS:	Kedric L. Payne Paul J. Solis Lee Goodman

SUMMARY: The witness is the Development Coordinator for Campaign for Primary Accountability ("CPA"). The OCE requested an interview with the witness on July 12, 2012, and she consented to an interview. The witness made the following statements in response to our questioning:

1. The witness was given an 18 U.S.C. § 1001 warning and consented to an interview. She signed a written acknowledgement of the warning, which will be placed in the case file in this review.

2. The witness is the Development Coordinator for CPA. She has been employed with CPA since November 2011.

3. Since August 2011, she has also been employed with the Alliance for Self Governance ("ASG") and Citizen Leader Alliance ("CLA"). The witness told the OCE that ASG and CLA are 501(c)(4) organizations. She is the Development Coordinator for ASG and does not have a title with CLA.

4. She is also employed with Citizens for Self Governance ("CSG"), which is a 501(c)(4) organization. She has been employed with CSG since January 2012.

5. When asked about the relationships among CPA, CLA, ASG, and CSG, the witness stated that there is no coordination among the entities and they do not share office space. She also stated that the organizations do not have joint events.

6. The witness told the OCE that CPA is comprised of several individuals. The Co-Chairmen, Leo Linbeck and Eric O'Keefe, are the heads of the organization. Mike

Barnhart is the Chief of Staff. Jamie Story is the Managing Director. Corey Whalen is the Political Director. The witness reports to Ms. Story and Mr. Barnhart.

7. The witness' job responsibilities with CPA include making bank deposits, compiling information for reports with the Federal Election Commission ("FEC"), fundraising "cold calls," direct mailing, and miscellaneous administrative "catch all" duties.

8. The witness makes records of contributions that CPA receives in spreadsheets. The spreadsheets include information that is required for FEC reporting. She provides the information from the spreadsheets to CPA's Treasurer, Jonathan Martin. The witness stated that no one assists her with her recordkeeping duties.

9. The witness told the OCE that she makes cold calls to potential donors. She determines whom to call by reviewing news articles and deciding who may want to make contributions to particular elections. The witness stated that no one assists her with the cold calling. She stated that Ms. Story makes phone calls to potential donors based on the Co-Chairmen's personal contacts.

10. The witness does not cold call Members of Congress.

11. The direct mailing is sent to individuals who are on a mailing list acquired by the CPA Co-Chairman. The witness is not involved in developing the list, but understands that the list is purchased for the mailings.

12. She was involved in fundraising for ASG in August and December 2011, but she has not done any fundraising for CLA or CSG. CPA typically does not have a fundraising event; occasionally a meeting is held where individuals are permitted to make contributions.

13. Decisions concerning CPA expenditures are determined by the Co-Chairmen, Mr. Barnhart and political teams. CPA has a Democratic political team and a Republican political team. Ms. Story makes presentations to small groups, writes mailings, and makes fundraising phone calls based on the co-chairs' lists.

14. When asked about her familiarity with the 18th District Central Republican Committee ("18th District Committee"), the witness stated that the committee contributed to CPA in March 2012.

15. The witness did not request the contribution from 18th District Committee. She learned of the contribution when Ms. Story called her and said that the contribution would be made online through the CPA website.

16. She stated that Ms. Story did not tell her whether CPA requested that 18th District Committee make the contribution.

17. Ms. Story informed the witness that Tania Hoerr was the contact person for 18th District Committee who could provide the witness with information on where to send a thank you note. The witness sent the thank you note to Mike Bigger. She did not receive a response.

18. The witness does not know whether Representative Aaron Schock's campaign is affiliated with 18th District Committee. She does not know Representative Schock or his staffers.

19. The witness was shown an email from her to Tania Hoerr, Campaign Director for Schock for Congress, dated March 16, 2012 (CPA 000003). She stated that the email concerns the refund of the $25,000 contribution that 18th District Committee made on the CPA website and the wire transfer of $25,000 by 18th District Committee.

20. The online contribution was refunded because the witness learned that the outside vendor responsible for processing online contributions would charge multiple fees for the large contributions and the contribution would not be deposited into the CPA bank account until after the Illinois primary election involving Representative Don Manzullo. The witness explained that the money was needed before the primary election in order to buy media ads.

21. She does not personally know Representative John Shimkus. The witness is familiar with Rodney Davis through emails but does not know him personally. She knew that Mr. Davis was affiliated with 18th District Committee and Every Republican is Crucial (ERIC PAC).

22. The witness knows of Representative Eric Cantor but not personally, and does not know any staffer for Representative Cantor.

23. Ms. Story introduced the witness to Mr. Davis over email in March or April of 2012.

24. The witness told the OCE that Mr. Davis was the contact person for a group of contributions that were made to CPA a week or so before the IL primary election.

25. She stated that she contacted Mr. Davis to get the complete contact information of these donors who made contributions by wire transfer and was supposed to let him know when CPA received the wire transfer and when CPA made the media buys.

26. The witness identified the following donors as part of the group of contributions to CPA where Mr. Davis was the contact person: 18th District Committee, American College of Radiology Association Political Action Committee; David Herro Trust; ERIC PAC; and Anne Dias Griffin. She told the OCE that to her knowledge no one from CPA requested the contributions from these individuals and entities.

27. The witness stated that she has not been contacted by the FEC regarding these events, or any other government entity besides the OCE.

This memorandum was prepared on July 12, 2012, based on the notes that the OCE staff prepared during the interview with the witness on July 12, 2012. I certify that this memorandum contains all pertinent matter discussed with the witness on July 12, 2012.

Kedric L. Payne
Deputy Chief Counsel

EXHIBIT 7

FEC FORM 3X

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

Office Use Only

1. NAME OF COMMITTEE (in full) **TYPE OR PRINT ▼** Example: If typing, type over the lines. 12FE4M5

CAMPAIGN FOR PRIMARY ACCOUNTABILITY INC

ADDRESS (number and street) ▼ 3900 ESSEX LANE SUITE 250

☐ Check if different than previously reported. (ACC)

CITY ▲ HOUSTON STATE ▲ TX ZIP CODE ▲ 77027 -

2. **FEC IDENTIFICATION NUMBER ▼** C C00502849

3. IS THIS REPORT ☒ NEW (N) **OR** ☐ AMENDED (A)

4. TYPE OF REPORT (Choose One)

(a) Quarterly Reports:

- ☐ April 15 Quarterly Report (Q1)
- ☐ July 15 Quarterly Report (Q2)
- ☐ October 15 Quarterly Report (Q3)
- ☐ January 31 Year-End Report (YE)
- ☐ July 31 Mid-Year Report (Non-election Year Only) (MY)
- ☐ Termination Report (TER)

(b) Monthly Report Due On:

☐ Feb 20 (M2)	☐ May 20 (M5)	☐ Aug 20 (M8)	☐ Nov 20 (M11) (Non-Election Year Only)
☐ Mar 20 (M3)	☐ Jun 20 (M6)	☐ Sep 20 (M9)	☐ Dec 20 (M12) (Non-Election Year Only)
☒ Apr 20 (M4)	☐ Jul 20 (M7)	☐ Oct 20 (M10)	☐ Jan 31 (YE)

(c) 12-Day **PRE**-Election Report for the: ☐ Primary (12P) ☐ General (12G) ☐ Runoff (12R) ☐ Convention (12C) ☐ Special (12S)

Election on M M / D D / Y Y Y Y in the State of

(d) 30-Day **POST**-Election Report for the: ☐ General (30G) ☐ Runoff (30R) ☐ Special (30S)

Election on M M / D D / Y Y Y Y in the State of

5. Covering Period 03 / 01 / 2012 through 03 / 31 / 2012

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer Jonathan Martin

Signature of Treasurer *Jonathan Martin* ***[Electronically Filed]*** Date 04 / 20 / 2012

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

Office Use Only							

FEC FORM 3X
Rev. 12/2004

FE6AN026

SUMMARY PAGE
OF RECEIPTS AND DISBURSEMENTS

FEC **Form 3X** (Rev. 02/2003)

Write or Type Committee Name

CAMPAIGN FOR PRIMARY ACCOUNTABILITY INC

Report Covering the Period: From: 03 / 01 / 2012 To: 03 / 31 / 2012

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. (a) Cash on Hand January 1, 2012		1673194.29
(b) Cash on Hand at Beginning of Reporting Period.....	588119.46	
(c) Total Receipts (from Line 19)	645645.00	705612.08
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B).....	1233764.46	2378806.37
7. Total Disbursements (from Line 31).....	795957.00	1940998.91
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d)).....	437807.46	437807.46
9. Debts and Obligations Owed **TO** the Committee (Itemize all on Schedule C and/or Schedule D)	0.00	
10. Debts and Obligations Owed **BY** the Committee (Itemize all on Schedule C and/or Schedule D)	0.00	

☐ This committee has qualified as a multicandidate committee. (see FEC FORM 1M)

For further information contact:

Federal Election Commission
999 E Street, NW
Washington, DC 20463

Toll Free 800-424-9530
Local 202-694-1100

DETAILED SUMMARY PAGE
of Receipts

FEC **Form 3X** (Rev. 06/2004)

Write or Type Committee Name

CAMPAIGN FOR PRIMARY ACCOUNTABILITY INC

Report Covering the Period: From: M M 03 / D D 01 / Y Y Y Y 2012 To: M M 03 / D D 31 / Y Y Y Y 2012

I. Receipts	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
11. Contributions (other than loans) From:		
(a) Individuals/Persons Other Than Political Committees		
(i) Itemized (use Schedule A)	642500.00	694850.00
(ii) Unitemized	3145.00	10762.08
(iii) TOTAL (add Lines 11(a)(i) and (ii)) ▶	645645.00	705612.08
(b) Political Party Committees	0.00	0.00
(c) Other Political Committees (such as PACs)	0.00	0.00
(d) Total Contributions (add Lines 11(a)(iii), (b), and (c)) (Carry Totals to Line 33, page 5) ▶	645645.00	705612.08
12. Transfers From Affiliated/Other Party Committees	0.00	0.00
13. All Loans Received	0.00	0.00
14. Loan Repayments Received	0.00	0.00
15. Offsets To Operating Expenditures (Refunds, Rebates, etc.) (Carry Totals to Line 37, page 5)	0.00	0.00
16. Refunds of Contributions Made to Federal Candidates and Other Political Committees	0.00	0.00
17. Other Federal Receipts (Dividends, Interest, etc.)	0.00	0.00
18. Transfers from Non-Federal and Levin Funds		
(a) Non-Federal Account (from Schedule H3)	0.00	0.00
(b) Levin Funds (from Schedule H5)	0.00	0.00
(c) Total Transfers (add 18(a) and 18(b))	0.00	0.00
19. Total Receipts (add Lines 11(d), 12, 13, 14, 15, 16, 17, and 18(c)) ▶	645645.00	705612.08
20. Total Federal Receipts (subtract Line 18(c) from Line 19) ▶	645645.00	705612.08

DETAILED SUMMARY PAGE
of Disbursements

FEC **Form 3X** (Rev. 02/2003)

II. Disbursements	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
21. Operating Expenditures:		
(a) Allocated Federal/Non-Federal Activity (from Schedule H4)		
(i) Federal Share	0.00	0.00
(ii) Non-Federal Share	0.00	0.00
(b) Other Federal Operating Expenditures	122793.34	915154.10
(c) Total Operating Expenditures (add 21(a)(i), (a)(ii), and (b)) ▶	122793.34	915154.10
22. Transfers to Affiliated/Other Party Committees	0.00	0.00
23. Contributions to Federal Candidates/Committees and Other Political Committees	0.00	0.00
24. Independent Expenditures (use Schedule E)	673163.66	1025844.81
25. Coordinated Party Expenditures (2 U.S.C. §441a(d)) (use Schedule F)	0.00	0.00
26. Loan Repayments Made	0.00	0.00
27. Loans Made	0.00	0.00
28. Refunds of Contributions To:		
(a) Individuals/Persons Other Than Political Committees	0.00	0.00
(b) Political Party Committees	0.00	0.00
(c) Other Political Committees (such as PACs)	0.00	0.00
(d) Total Contribution Refunds (add Lines 28(a), (b), and (c)) ▶	0.00	0.00
29. Other Disbursements	0.00	0.00
30. Federal Election Activity (2 U.S.C. §431(20))		
(a) Allocated Federal Election Activity (from Schedule H6)		
(i) Federal Share	0.00	0.00
(ii) "Levin" Share	0.00	0.00
(b) Federal Election Activity Paid Entirely With Federal Funds	0.00	0.00
(c) Total Federal Election Activity (add Lines 30(a)(i), 30(a)(ii) and 30(b)) ▶	0.00	0.00
31. Total Disbursements (add Lines 21(c), 22, 23, 24, 25, 26, 27, 28(d), 29 and 30(c))	795957.00	1940998.91
32. Total Federal Disbursements (subtract Line 21(a)(ii) and Line 30(a)(ii) from Line 31) ▶	795957.00	1940998.91

DETAILED SUMMARY PAGE
of Disbursements

FEC **Form 3X** (Rev. 02/2003)

III. Net Contributions/Operating Expenditures	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
33. Total Contributions (other than loans) (from Line 11(d), page 3)	645645.00	705612.08
34. Total Contribution Refunds (from Line 28(d))	0.00	0.00
35. Net Contributions (other than loans) (subtract Line 34 from Line 33)	645645.00	705612.08
36. Total Federal Operating Expenditures (add Line 21(a)(i) and Line 21(b)) ▶	122793.34	915154.10
37. Offsets to Operating Expenditures (from Line 15, page 3)	0.00	0.00
38. Net Operating Expenditures (subtract Line 37 from Line 36) ▶	122793.34	915154.10

SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS

Use separate schedule(s) for each category of the Detailed Summary Page

FOR LINE NUMBER: (check only one)
[X] 11a [ ] 11b [ ] 11c [ ] 12
[ ] 13 [ ] 14 [ ] 15 [ ] 16 [ ] 17

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NAME OF COMMITTEE (In Full)
CAMPAIGN FOR PRIMARY ACCOUNTABILITY INC

A.
Full Name (Last, First, Middle Initial): 18TH DISTRICT REPUBLICAN CENTRAL COMMIITTEE (FEDERAL ACCOUNT)
Mailing Address: PO BOX 10362
City: PEORIA State: IL Zip Code: 61612
FEC ID number of contributing federal political committee: C C00493460
Name of Employer:
Occupation:
Receipt For: [ ] Primary [ ] General [ ] Other (specify) ▼
Aggregate Year-to-Date ▼ 25000.00
Date of Receipt: 03 / 16 / 2012
Transaction ID : SA11AI.4760
Amount of Each Receipt this Period: 25000.00
Individual contribution

B.
Full Name (Last, First, Middle Initial): AMERICAN COLLEGE OF RADIOLOGY ASSOCIATION POLITICAL ACTION COMMITTEE
Mailing Address: 1891 PRESTON WHITE DRIVE
City: RESTON State: VA Zip Code: 20191
FEC ID number of contributing federal political committee: C C00343459
Name of Employer:
Occupation:
Receipt For: [ ] Primary [ ] General [ ] Other (specify) ▼
Aggregate Year-to-Date ▼ 5000.00
Date of Receipt: 03 / 22 / 2012
Transaction ID : SA11AI.4766
Amount of Each Receipt this Period: 5000.00
Individual contribution

C.
Full Name (Last, First, Middle Initial): Devin Anderson
Mailing Address: [redacted]
City: Carmel State: IN Zip Code: 46032
FEC ID number of contributing federal political committee: C
Name of Employer: N/A
Occupation: N/A
Receipt For: [ ] Primary [ ] General [ ] Other (specify) ▼
Aggregate Year-to-Date ▼ 5000.00
Date of Receipt: 03 / 28 / 2012
Transaction ID : SA11AI.4736
Amount of Each Receipt this Period: 5000.00
Individual contribution

SUBTOTAL of Receipts This Page (optional) ▶ 35000.00

TOTAL This Period (last page this line number only) ▶

SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS

Use separate schedule(s) for each category of the Detailed Summary Page

FOR LINE NUMBER: (check only one)
[X] 11a [ ] 11b [ ] 11c [ ] 12
[ ] 13 [ ] 14 [ ] 15 [ ] 16 [ ] 17

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NAME OF COMMITTEE (In Full)
CAMPAIGN FOR PRIMARY ACCOUNTABILITY INC

A. Full Name (Last, First, Middle Initial): John D. Bryan
Mailing Address [redacted]
City: Lake Oswego | State: OR | Zip Code: 97035-0019
FEC ID number of contributing federal political committee: C
Name of Employer: Retired | Occupation: Engineer
Receipt For: [ ] Primary [ ] General [ ] Other (specify) ▼
Aggregate Year-to-Date ▼: 10000.00
Date of Receipt: 03 / 14 / 2012
Transaction ID : SA11AI.4742
Amount of Each Receipt this Period: 10000.00
Individual contribution

B. Full Name (Last, First, Middle Initial): Jerome Cantrell
Mailing Address [redacted]
City: Gardendale | State: AL | Zip Code: 35071
FEC ID number of contributing federal political committee: C
Name of Employer: Cantrell Development Company | Occupation: Owner
Receipt For: [ ] Primary [ ] General [ ] Other (specify) ▼
Aggregate Year-to-Date ▼: 250.00
Date of Receipt: 03 / 08 / 2012
Transaction ID : SA11AI.4803
Amount of Each Receipt this Period: 250.00
Online contribution

C. Full Name (Last, First, Middle Initial): Gerardo Chapa
Mailing Address [redacted]
City: Houston | State: TX | Zip Code: 77056
FEC ID number of contributing federal political committee: C
Name of Employer: Global Financial Services | Occupation: Managing Director
Receipt For: [ ] Primary [ ] General [ ] Other (specify) ▼
Aggregate Year-to-Date ▼: 1000.00
Date of Receipt: 03 / 22 / 2012
Transaction ID : SA11AI.4762
Amount of Each Receipt this Period: 1000.00
Individual contribution

SUBTOTAL of Receipts This Page (optional) ▶ 11250.00

TOTAL This Period (last page this line number only) ▶

SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS

Use separate schedule(s) for each category of the Detailed Summary Page

FOR LINE NUMBER: (check only one)
[X] 11a [ ] 11b [ ] 11c [ ] 12
[ ] 13 [ ] 14 [ ] 15 [ ] 16 [ ] 17

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NAME OF COMMITTEE (In Full)
CAMPAIGN FOR PRIMARY ACCOUNTABILITY INC

A. Full Name (Last, First, Middle Initial): W. Stuart Darnette
Mailing Address [redacted]
City: Cincinnati State: OH Zip Code: 45235-3948
FEC ID number of contributing federal political committee: C
Name of Employer: Taft Settinius Hollister
Occupation: Attorney
Receipt For: [ ] Primary [ ] General [ ] Other (specify) ▼
Aggregate Year-to-Date ▼ 1000.00
Date of Receipt: 03 / 13 / 2012
Transaction ID : SA11AI.4723
Amount of Each Receipt this Period: 1000.00
Individual contribution

B. Full Name (Last, First, Middle Initial): David Herro Trust
Mailing Address [redacted]
City: Chicago State: IL Zip Code: 60610
FEC ID number of contributing federal political committee: C
Name of Employer:
Occupation:
Receipt For: [ ] Primary [ ] General [ ] Other (specify) ▼
Aggregate Year-to-Date ▼ 35000.00
Date of Receipt: 03 / 14 / 2012
Transaction ID : SA11AI.4758
Amount of Each Receipt this Period: 35000.00
Individual contribution

C. Full Name (Last, First, Middle Initial): John Eads
Mailing Address 1839 Kirby Drive
Suite 3660
City: Houston State: TX Zip Code: 77019
FEC ID number of contributing federal political committee: C
Name of Employer: Texas Power Products
Occupation: President
Receipt For: [ ] Primary [ ] General [ ] Other (specify) ▼
Aggregate Year-to-Date ▼ 15000.00
Date of Receipt: 03 / 07 / 2012
Transaction ID : SA11AI.4836
Amount of Each Receipt this Period: 15000.00
Online contribution

SUBTOTAL of Receipts This Page (optional) ▶ 51000.00

TOTAL This Period (last page this line number only) ▶

SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS

Use separate schedule(s) for each category of the Detailed Summary Page

FOR LINE NUMBER: (check only one)
[X] 11a [ ] 11b [ ] 11c [ ] 12
[ ] 13 [ ] 14 [ ] 15 [ ] 16 [ ] 17

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NAME OF COMMITTEE (In Full)
CAMPAIGN FOR PRIMARY ACCOUNTABILITY INC

A. Full Name (Last, First, Middle Initial)
EVERY REPUBLICAN IS CRUCIAL (ERICPAC)

Mailing Address 25 E MAIN STREET
SUITE 200

City: RICHMOND
State: VA
Zip Code: 23219

FEC ID number of contributing federal political committee.: C C00384701

Name of Employer:
Occupation:

Receipt For: [ ] Primary [ ] General [ ] Other (specify) ▼

Aggregate Year-to-Date ▼ 25000.00

Date of Receipt: 03 / 15 / 2012
Transaction ID : SA11AI.4771

Amount of Each Receipt this Period: 25000.00
Individual contribution

B. Full Name (Last, First, Middle Initial)
Jonathan Farber

Mailing Address [redacted]

City: Westport
State: CT
Zip Code: 06880

FEC ID number of contributing federal political committee.: C

Name of Employer: Lime Rock Partners
Occupation: Co-founder and Managing Director

Receipt For: [ ] Primary [ ] General [ ] Other (specify) ▼

Aggregate Year-to-Date ▼ 100000.00

Date of Receipt: 03 / 22 / 2012
Transaction ID : SA11AI.4768

Amount of Each Receipt this Period: 100000.00
Individual Contribution

C. Full Name (Last, First, Middle Initial)
John Flatowicz

Mailing Address [redacted]

City: Sugar Land
State: TX
Zip Code: 77479

FEC ID number of contributing federal political committee.: C

Name of Employer: Briggs & Veselka Co.
Occupation: CPA/ Shareholder

Receipt For: [ ] Primary [ ] General [ ] Other (specify) ▼

Aggregate Year-to-Date ▼ 1000.00

Date of Receipt: 03 / 23 / 2012
Transaction ID : SA11AI.4875

Amount of Each Receipt this Period: 1000.00
Online contribution

SUBTOTAL of Receipts This Page (optional) ▶ 126000.00

TOTAL This Period (last page this line number only) ▶

SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS

Use separate schedule(s) for each category of the Detailed Summary Page

FOR LINE NUMBER: (check only one)
[X] 11a [ ] 11b [ ] 11c [ ] 12
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NAME OF COMMITTEE (In Full)
CAMPAIGN FOR PRIMARY ACCOUNTABILITY INC

A. Full Name (Last, First, Middle Initial): Lloyd R. French III
Mailing Address: 1811 Bering Drive, Suite 400
City: Houston State: TX Zip Code: 77057
FEC ID number of contributing federal political committee: C
Name of Employer: Northwind Energy Partners, LLC
Occupation: Executive
Receipt For: [ ] Primary [ ] General [ ] Other (specify)
Aggregate Year-to-Date: 10000.00
Date of Receipt: 03/30/2012
Transaction ID : SA11AI.4886
Amount of Each Receipt this Period: 10000.00
Online contribution

B. Full Name (Last, First, Middle Initial): Anne Dias Griffin
Mailing Address: 180 N. Stetson, Suite 5350
City: Chicago State: IL Zip Code: 60601
FEC ID number of contributing federal political committee: C
Name of Employer: Aragon Global Management, LLC
Occupation: Portfolio Management
Receipt For: [ ] Primary [ ] General [ ] Other (specify)
Aggregate Year-to-Date: 30000.00
Date of Receipt: 03/16/2012
Transaction ID : SA11AI.4734
Amount of Each Receipt this Period: 30000.00
Individual contribution

C. Full Name (Last, First, Middle Initial): Kittle's Furniture
Mailing Address: [redacted]
City: Indianapolis State: IN Zip Code: 46250-1533
FEC ID number of contributing federal political committee: C
Name of Employer:
Occupation:
Receipt For: [ ] Primary [ ] General [ ] Other (specify)
Aggregate Year-to-Date: 5000.00
Date of Receipt: 03/28/2012
Transaction ID : SA11AI.4738
Amount of Each Receipt this Period: 5000.00
Individual contribution

SUBTOTAL of Receipts This Page (optional) ▶ 45000.00

TOTAL This Period (last page this line number only) ▶

SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS

Use separate schedule(s) for each category of the Detailed Summary Page

FOR LINE NUMBER: (check only one)
[X] 11a [ ] 11b [ ] 11c [ ] 12
[ ] 13 [ ] 14 [ ] 15 [ ] 16 [ ] 17

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NAME OF COMMITTEE (In Full)
CAMPAIGN FOR PRIMARY ACCOUNTABILITY INC

A. Full Name (Last, First, Middle Initial): Thomas C Knox
Mailing Address [redacted]
City: Boerne | State: TX | Zip Code: 78006
FEC ID number of contributing federal political committee: C
Name of Employer: Cobisa-Greenville Energy | Occupation: Executive
Receipt For: [ ] Primary [ ] General [ ] Other (specify) ▼
Aggregate Year-to-Date ▼: 500.00
Date of Receipt: 03 / 19 / 2012
Transaction ID : SA11AI.4864
Amount of Each Receipt this Period: 500.00
Online contribution

B. Full Name (Last, First, Middle Initial): Benjamin Kohlmann
Mailing Address [redacted]
City: San Diego | State: CA | Zip Code: 92101
FEC ID number of contributing federal political committee: C
Name of Employer: US Navy | Occupation: Naval Aviator
Receipt For: [ ] Primary [ ] General [ ] Other (specify) ▼
Aggregate Year-to-Date ▼: 250.00
Date of Receipt: 03 / 30 / 2012
Transaction ID : SA11AI.4888
Amount of Each Receipt this Period: 250.00
Online contribution

C. Full Name (Last, First, Middle Initial): Leo Linbeck III
Mailing Address [redacted]
City: Houston | State: TX | Zip Code: 77227
FEC ID number of contributing federal political committee: C
Name of Employer: Aquinas Companies, LLC | Occupation: President & CEO
Receipt For: [ ] Primary [ ] General [ ] Other (specify) ▼
Aggregate Year-to-Date ▼: 250000.00
Date of Receipt: 03 / 08 / 2012
Transaction ID : SA11AI.4722
Amount of Each Receipt this Period: 250000.00
Individual contribution

SUBTOTAL of Receipts This Page (optional) ▶ 250750.00

TOTAL This Period (last page this line number only) ▶

SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS

Use separate schedule(s) for each category of the Detailed Summary Page

FOR LINE NUMBER: (check only one)
[X] 11a [ ] 11b [ ] 11c [ ] 12
[ ] 13 [ ] 14 [ ] 15 [ ] 16 [ ] 17

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NAME OF COMMITTEE (In Full)
CAMPAIGN FOR PRIMARY ACCOUNTABILITY INC

A. Full Name (Last, First, Middle Initial): Leo Linbeck III
Mailing Address [redacted]
City: Houston State: TX Zip Code: 77227
FEC ID number of contributing federal political committee: C
Name of Employer: Aquinas Companies, LLC
Occupation: President & CEO
Receipt For: [ ] Primary [ ] General [ ] Other (specify) ▼
Aggregate Year-to-Date ▼ 350000.00
Date of Receipt: 03 / 29 / 2012
Transaction ID : SA11AI.4770
Amount of Each Receipt this Period: 100000.00
Individual contribution

B. Full Name (Last, First, Middle Initial): Colleen McLane
Mailing Address [redacted]
City: Midland State: TX Zip Code: 79705
FEC ID number of contributing federal political committee: C
Name of Employer: Self-employed
Occupation: Consultant
Receipt For: [ ] Primary [ ] General [ ] Other (specify) ▼
Aggregate Year-to-Date ▼ 5000.00
Date of Receipt: 03 / 28 / 2012
Transaction ID : SA11AI.4740
Amount of Each Receipt this Period: 5000.00
Individual contribution

C. Full Name (Last, First, Middle Initial): Peter C. Morse
Mailing Address: 100 Front Street, Suite 900
City: W. Conshohocken State: PA Zip Code: 19428
FEC ID number of contributing federal political committee: C
Name of Employer: Morse Partners, Inc.
Occupation: President
Receipt For: [ ] Primary [ ] General [ ] Other (specify) ▼
Aggregate Year-to-Date ▼ 15000.00
Date of Receipt: 03 / 20 / 2012
Transaction ID : SA11AI.4871
Amount of Each Receipt this Period: 15000.00
Online contribution

SUBTOTAL of Receipts This Page (optional) ▶ 120000.00

TOTAL This Period (last page this line number only) ▶

SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS

Use separate schedule(s) for each category of the Detailed Summary Page

FOR LINE NUMBER: (check only one)
[X] 11a [ ] 11b [ ] 11c [ ] 12
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NAME OF COMMITTEE (In Full)
CAMPAIGN FOR PRIMARY ACCOUNTABILITY INC

A. Full Name (Last, First, Middle Initial): Kathleen N. Peters
Mailing Address [redacted]
City: Cincinnati State: OH Zip Code: 45243
FEC ID number of contributing federal political committee: C
Name of Employer: N/A Occupation: N/A
Receipt For: [ ] Primary [ ] General [ ] Other (specify) ▼
Aggregate Year-to-Date ▼ 1000.00
Date of Receipt: 03 / 14 / 2012
Transaction ID : SA11AI.4744
Amount of Each Receipt this Period: 1000.00
Individual contribution

B. Full Name (Last, First, Middle Initial): Durwood Rorie
Mailing Address [redacted]
City: Cincinnati State: OH Zip Code: 45243-3212
FEC ID number of contributing federal political committee: C
Name of Employer: N/A Occupation: N/A
Receipt For: [ ] Primary [ ] General [ ] Other (specify) ▼
Aggregate Year-to-Date ▼ 500.00
Date of Receipt: 03 / 22 / 2012
Transaction ID : SA11AI.4764
Amount of Each Receipt this Period: 500.00
Individual contribution

C. Full Name (Last, First, Middle Initial): Kevin V. Spriggs
Mailing Address [redacted]
City: Daphne State: AL Zip Code: 36526
FEC ID number of contributing federal political committee: C
Name of Employer: Spriggs Enterprises Inc. Occupation: President
Receipt For: [ ] Primary [ ] General [ ] Other (specify) ▼
Aggregate Year-to-Date ▼ 1500.00
Date of Receipt: 03 / 09 / 2012
Transaction ID : SA11AI.4828
Amount of Each Receipt this Period: 1500.00
Online contribution

SUBTOTAL of Receipts This Page (optional) ▶ 3000.00

TOTAL This Period (last page this line number only) ▶

SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS

Use separate schedule(s) for each category of the Detailed Summary Page

FOR LINE NUMBER: (check only one)
[X] 11a [ ] 11b [ ] 11c [ ] 12
[ ] 13 [ ] 14 [ ] 15 [ ] 16 [ ] 17

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NAME OF COMMITTEE (In Full)
CAMPAIGN FOR PRIMARY ACCOUNTABILITY INC

A.
Full Name (Last, First, Middle Initial): Mark Thomas
Mailing Address: [redacted]
City: Midland
State: TX
Zip Code: 79705-1929
FEC ID number of contributing federal political committee: C
Name of Employer: Plains Marketing, L.P.
Occupation: Oil Marketing & Trans.
Receipt For: [ ] Primary [ ] General [ ] Other (specify) ▼
Aggregate Year-to-Date ▼: 500.00
Date of Receipt: 03 / 29 / 2012
Transaction ID : SA11AI.4883
Amount of Each Receipt this Period: 500.00
Online contribution

B.
Full Name (Last, First, Middle Initial):
Mailing Address:
City:
State:
Zip Code:
FEC ID number of contributing federal political committee: C
Name of Employer:
Occupation:
Receipt For: [ ] Primary [ ] General [ ] Other (specify) ▼
Aggregate Year-to-Date ▼:
Date of Receipt: M M / D D / Y Y Y Y
Amount of Each Receipt this Period:

C.
Full Name (Last, First, Middle Initial):
Mailing Address:
City:
State:
Zip Code:
FEC ID number of contributing federal political committee: C
Name of Employer:
Occupation:
Receipt For: [ ] Primary [ ] General [ ] Other (specify) ▼
Aggregate Year-to-Date ▼:
Date of Receipt: M M / D D / Y Y Y Y
Amount of Each Receipt this Period:

SUBTOTAL of Receipts This Page (optional) ▶ 500.00

TOTAL This Period (last page this line number only) ▶ 642500.00

SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS

Use separate schedule(s) for each category of the Detailed Summary Page

FOR LINE NUMBER: (check only one)
[X] 21b [ ] 22 [ ] 23 [ ] 24 [ ] 25 [ ] 26
[ ] 27 [ ] 28a [ ] 28b [ ] 28c [ ] 29 [ ] 30b

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NAME OF COMMITTEE (In Full)
CAMPAIGN FOR PRIMARY ACCOUNTABILITY INC

A. Full Name (Last, First, Middle Initial): Bank of America
Mailing Address: PO Box 25118
City: Tampa State: FL Zip Code: 33622-5118
Purpose of Disbursement: Bank fees
Candidate Name:
Category/Type: 001
Office Sought: [ ] House [ ] Senate [ ] President
State: District:
Disbursement For: 2012 [X] Primary [ ] General [ ] Other (specify)
Date of Disbursement: 03 / 30 / 2012
Transaction ID : SB21B.4893
Amount of Each Disbursement this Period: 769.00

B. Full Name (Last, First, Middle Initial): Brierfield Campaigns, Inc
Mailing Address: 1000 E William St. Suite 204
City: Carson City State: NV Zip Code: 89701
Purpose of Disbursement: Filed work
Candidate Name:
Category/Type: 001
Office Sought: [ ] House [ ] Senate [ ] President
State: District:
Disbursement For: 2012 [X] Primary [ ] General [ ] Other (specify)
Date of Disbursement: 03 / 02 / 2012
Transaction ID : SB21B.4899
Amount of Each Disbursement this Period: 11321.52

C. Full Name (Last, First, Middle Initial): BRI Essex, LLC
Mailing Address: PO Box 203015
City: Dallas State: TX Zip Code: 75320-3015
Purpose of Disbursement: Rent
Candidate Name:
Category/Type: 001
Office Sought: [ ] House [ ] Senate [ ] President
State: District:
Disbursement For: 2012 [X] Primary [ ] General [ ] Other (specify)
Date of Disbursement: 03 / 01 / 2012
Transaction ID : SB21B.4897
Amount of Each Disbursement this Period: 499.04

SUBTOTAL of Disbursements This Page (optional) ▶ 12589.56

TOTAL This Period (last page this line number only) ▶

SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS

Use separate schedule(s) for each category of the Detailed Summary Page

FOR LINE NUMBER: (check only one)
[X] 21b [ ] 22 [ ] 23 [ ] 24 [ ] 25 [ ] 26
[ ] 27 [ ] 28a [ ] 28b [ ] 28c [ ] 29 [ ] 30b

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NAME OF COMMITTEE (In Full)
CAMPAIGN FOR PRIMARY ACCOUNTABILITY INC

A. Full Name (Last, First, Middle Initial): Ceterus, Inc.
Mailing Address: PO Box 19366
City: Kalamazoo State: MI Zip Code: 49019
Purpose of Disbursement: Accounting fees
Category/Type: 001
Candidate Name:
Office Sought: [ ] House [ ] Senate [ ] President
State: District:
Disbursement For: 2012 [X] Primary [ ] General [ ] Other (specify)
Date of Disbursement: 03 / 01 / 2012
Transaction ID : SB21B.4892
Amount of Each Disbursement this Period: 2000.00

B. Full Name (Last, First, Middle Initial): Hannah Christian
Mailing Address: 3900 Essex Lane Ste. 250
City: Houston State: TX Zip Code: 77027
Purpose of Disbursement: Payroll
Category/Type: 001
Candidate Name:
Office Sought: [ ] House [ ] Senate [ ] President
State: District:
Disbursement For: 2012 [X] Primary [ ] General [ ] Other (specify)
Date of Disbursement: 03 / 01 / 2012
Transaction ID : SB21B.4906
Amount of Each Disbursement this Period: 1000.00

C. Full Name (Last, First, Middle Initial): Hannah Christian
Mailing Address: 3900 Essex Lane Ste. 250
City: Houston State: TX Zip Code: 77027
Purpose of Disbursement: Office expense
Category/Type: 001
Candidate Name:
Office Sought: [ ] House [ ] Senate [ ] President
State: District:
Disbursement For: 2012 [X] Primary [ ] General [ ] Other (specify)
Date of Disbursement: 03 / 12 / 2012
Transaction ID : SB21B.4896
Amount of Each Disbursement this Period: 316.65

SUBTOTAL of Disbursements This Page (optional) ▶ 3316.65

TOTAL This Period (last page this line number only) ▶

SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS

Use separate schedule(s) for each category of the Detailed Summary Page

FOR LINE NUMBER: (check only one)
[X] 21b [ ] 22 [ ] 23 [ ] 24 [ ] 25 [ ] 26
[ ] 27 [ ] 28a [ ] 28b [ ] 28c [ ] 29 [ ] 30b

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NAME OF COMMITTEE (In Full)
CAMPAIGN FOR PRIMARY ACCOUNTABILITY INC

A. Full Name (Last, First, Middle Initial): Lewis Advertising
Mailing Address: PO Box 544
City: Wetumpka State: FL Zip Code: 36092
Purpose of Disbursement: Production and content consulting
Category/Type: 004
Candidate Name:
Office Sought: [ ] House [ ] Senate [ ] President
State: District:
Disbursement For: 2012 [X] Primary [ ] General [ ] Other (specify)
Date of Disbursement: 03 / 30 / 2012
Transaction ID : SB21B.4904
Amount of Each Disbursement this Period: 14950.00

B. Full Name (Last, First, Middle Initial): Jonathan Martin
Mailing Address: 1739 Maybank Highway, Suite T-346
City: Charleston State: SC Zip Code: 29412
Purpose of Disbursement: Treasurer fees
Category/Type: 001
Candidate Name:
Office Sought: [ ] House [ ] Senate [ ] President
State: District:
Disbursement For: 2012 [X] Primary [ ] General [ ] Other (specify)
Date of Disbursement: 03 / 01 / 2012
Transaction ID : SB21B.4894
Amount of Each Disbursement this Period: 500.00

C. Full Name (Last, First, Middle Initial): Message & Media
Mailing Address: 3101 Lee Highway, Suite 18 #136
City: Bristol State: VA Zip Code: 24202
Purpose of Disbursement: Production and content consulting
Category/Type: 004
Candidate Name:
Office Sought: [ ] House [ ] Senate [ ] President
State: District:
Disbursement For: 2012 [X] Primary [ ] General [ ] Other (specify)
Date of Disbursement: 03 / 07 / 2012
Transaction ID : SB21B.4903
Amount of Each Disbursement this Period: 34325.00

SUBTOTAL of Disbursements This Page (optional) ▶ 49775.00

TOTAL This Period (last page this line number only) ▶

SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS

Use separate schedule(s) for each category of the Detailed Summary Page

FOR LINE NUMBER: (check only one)
[X] 21b [ ] 22 [ ] 23 [ ] 24 [ ] 25 [ ] 26
[ ] 27 [ ] 28a [ ] 28b [ ] 28c [ ] 29 [ ] 30b

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)
CAMPAIGN FOR PRIMARY ACCOUNTABILITY INC

A. Full Name (Last, First, Middle Initial): Piryx, Inc.
Mailing Address: 144 2nd St. 1st Floor
City: San Francisco State: CA Zip Code: 94105
Purpose of Disbursement: Credit card processing fees
Category/Type: 001
Candidate Name:
Office Sought: [ ] House [ ] Senate [ ] President
State: District:
Disbursement For: 2012 [X] Primary [ ] General [ ] Other (specify)
Date of Disbursement: 03 / 30 / 2012
Transaction ID : SB21B.4891
Amount of Each Disbursement this Period: 2141.61

B. Full Name (Last, First, Middle Initial): James C. Story Jr.
Mailing Address: [redacted]
City: Bedford State: TX Zip Code: 76021
Purpose of Disbursement: Payroll
Category/Type: 001
Candidate Name:
Office Sought: [ ] House [ ] Senate [ ] President
State: District:
Disbursement For: 2012 [X] Primary [ ] General [ ] Other (specify)
Date of Disbursement: 03 / 31 / 2012
Transaction ID : SB21B.4905
Amount of Each Disbursement this Period: 1000.00

C. Full Name (Last, First, Middle Initial): The Schuman Group
Mailing Address: 7660 Fay Ave.
City: La Jolla State: CA Zip Code: 92037
Purpose of Disbursement: Field work & field staff
Category/Type: 001
Candidate Name:
Office Sought: [ ] House [ ] Senate [ ] President
State: District:
Disbursement For: 2012 [X] Primary [ ] General [ ] Other (specify)
Date of Disbursement: 03 / 30 / 2012
Transaction ID : SB21B.4901
Amount of Each Disbursement this Period: 27264.02

SUBTOTAL of Disbursements This Page (optional) ▶ 30405.63

TOTAL This Period (last page this line number only) ▶

SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS

Use separate schedule(s) for each category of the Detailed Summary Page

FOR LINE NUMBER: (check only one)
[X] 21b [ ] 22 [ ] 23 [ ] 24 [ ] 25 [ ] 26
[ ] 27 [ ] 28a [ ] 28b [ ] 28c [ ] 29 [ ] 30b

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)
CAMPAIGN FOR PRIMARY ACCOUNTABILITY INC

A. Full Name (Last, First, Middle Initial): Thomas Graphics, Inc.
Mailing Address: P.O. Box 142226
City: Austin State: TX Zip Code: 78714-2226
Purpose of Disbursement: Production costs
Candidate Name:
Category/Type:
Office Sought: [ ] House [ ] Senate [ ] President
State: District:
Disbursement For: 2012 [X] Primary [ ] General [ ] Other (specify)
Date of Disbursement: 03 / 30 / 2012
Transaction ID : SB21B.4898
Amount of Each Disbursement this Period: 22489.50

B. Full Name (Last, First, Middle Initial): Corie Whalen
Mailing Address: [redacted]
City: Houston State: TX Zip Code: 77057
Purpose of Disbursement: Payroll
Candidate Name:
Category/Type: 001
Office Sought: [ ] House [ ] Senate [ ] President
State: District:
Disbursement For: 2012 [X] Primary [ ] General [ ] Other (specify)
Date of Disbursement: 03 / 01 / 2012
Transaction ID : SB21B.4900
Amount of Each Disbursement this Period: 4167.00

C. Full Name (Last, First, Middle Initial):
Mailing Address:
City: State: Zip Code:
Purpose of Disbursement:
Candidate Name:
Category/Type:
Office Sought: [ ] House [ ] Senate [ ] President
State: District:
Disbursement For: [ ] Primary [ ] General [ ] Other (specify)
Date of Disbursement: / /
Amount of Each Disbursement this Period:

SUBTOTAL of Disbursements This Page (optional) ▶ 26656.50

TOTAL This Period (last page this line number only) ▶ 122743.34

SCHEDULE E (FEC Form 3X)
ITEMIZED INDEPENDENT EXPENDITURES

NAME OF COMMITTEE (In Full)
CAMPAIGN FOR PRIMARY ACCOUNTABILITY INC

FEC IDENTIFICATION NUMBER ▼
C C00502849

Check if ☐ 24-hour report ☐ 48-hour report ☐ New report ☐ Amends report filed on MM / DD / YYYY

Full Name (Last, First, Middle Initial) of Payee
Campaign Grid

Date 03 / 08 / 2012

Mailing Address 414 Commerce Drive
Suite 100

City: Fort Washington State: PA Zip Code: 19034

Amount 10000.00

Transaction ID : SE.4439

Purpose of Expenditure
Online advertisements

Category/Type 004

Office Sought: ☒ House ☐ Senate ☐ President State: AL District: 06

Name of Federal Candidate Supported or Opposed by Expenditure:
SPENCER T. BACHUS

Check One: ☐ Support ☒ Oppose

Calendar Year-To-Date Per Election for Office Sought 184804.30

Disbursement For: ☒ Primary ☐ General 2012 ☐ Other (specify) ▶

Full Name (Last, First, Middle Initial) of Payee
Campaign Grid

Date 03 / 08 / 2012

Mailing Address 414 Commerce Drive
Suite 100

City: Fort Washington State: PA Zip Code: 19034

Amount 10000.00

Transaction ID : SE.4441

Purpose of Expenditure
Online advertisement

Category/Type 004

Office Sought: ☒ House ☐ Senate ☐ President State: IL District: 16

Name of Federal Candidate Supported or Opposed by Expenditure:
DONALD A. MANZULLO

Check One: ☐ Support ☒ Oppose

Calendar Year-To-Date Per Election for Office Sought 28871.93

Disbursement For: ☒ Primary ☐ General 2012 ☐ Other (specify) ▶

(a) **SUBTOTAL** of Itemized Independent Expenditures ▶ 20000.00

(b) **SUBTOTAL** of Unitemized Independent Expenditures ▶

(c) **TOTAL** Independent Expenditures ▶

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.

Jonathan Martin *[Electronically Filed]*
Signature

Date 04 / 20 / 2012

SCHEDULE E (FEC Form 3X)
ITEMIZED INDEPENDENT EXPENDITURES

NAME OF COMMITTEE (In Full)
CAMPAIGN FOR PRIMARY ACCOUNTABILITY INC

FEC IDENTIFICATION NUMBER ▼
C C00502849

Check if ☐ 24-hour report ☐ 48-hour report ☐ New report ☐ Amends report filed on MM / DD / YYYY

Full Name (Last, First, Middle Initial) of Payee
Campaign Grid

Date 03 / 11 / 2012

Mailing Address 414 Commerce Drive
Suite 100

Amount 1500.00

City: Fort Washington State: PA Zip Code: 19034

Transaction ID : SE.4476

Purpose of Expenditure: Online advertisement

Category/Type: 004

Office Sought: ☒ House ☐ Senate ☐ President State: AL District: 01

Name of Federal Candidate Supported or Opposed by Expenditure:
JO BONNER

Check One: ☐ Support ☒ Oppose

Calendar Year-To-Date Per Election for Office Sought 2012: 121412.65

Disbursement For: ☒ Primary ☐ General ☐ Other (specify) ▶

Full Name (Last, First, Middle Initial) of Payee
CMF Communications

Date 03 / 01 / 2012

Mailing Address 25000 Portofino Cir.
#129

Amount 4167.25

City: Palm Beach Gardens State: FL Zip Code: 33148-1293

Transaction ID : SE.4334

Purpose of Expenditure: Robo Calls

Category/Type: 006

Office Sought: ☒ House ☐ Senate ☐ President State: OH District: 09

Name of Federal Candidate Supported or Opposed by Expenditure:
MARCY C HON. KAPTUR

Check One: ☐ Support ☒ Oppose

Calendar Year-To-Date Per Election for Office Sought 2012: 105408.30

Disbursement For: ☒ Primary ☐ General ☐ Other (specify) ▶

(a) **SUBTOTAL** of Itemized Independent Expenditures ▶ 5667.25

(b) **SUBTOTAL** of Unitemized Independent Expenditures ▶

(c) **TOTAL** Independent Expenditures ▶

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.

Jonathan Martin *[Electronically Filed]*
Signature

Date 04 / 20 / 2012

SCHEDULE E (FEC Form 3X)
ITEMIZED INDEPENDENT EXPENDITURES

NAME OF COMMITTEE (In Full)
CAMPAIGN FOR PRIMARY ACCOUNTABILITY INC

FEC IDENTIFICATION NUMBER ▼
C C00502849

Check if ☐ 24-hour report ☐ 48-hour report ☐ New report ☐ Amends report filed on MM / DD / YYYY

Full Name (Last, First, Middle Initial) of Payee
CMF Communications

Date: 03 / 01 / 2012

Mailing Address 25000 Portofino Cir.
#129

City: Palm Beach Gardens State: FL Zip Code: 33148-1293

Amount: 166.66

Transaction ID : SE.4336

Purpose of Expenditure: Robo Calls

Category/Type: 004

Office Sought: ☒ House ☐ Senate ☐ President State: OH District: 09

Name of Federal Candidate Supported or Opposed by Expenditure:
MARCY C HON. KAPTUR

Check One: ☐ Support ☒ Oppose

Calendar Year-To-Date Per Election for Office Sought 2012: 105574.96

Disbursement For: ☒ Primary ☐ General ☐ Other (specify) ▶

Full Name (Last, First, Middle Initial) of Payee
CMF Communications

Date: 03 / 01 / 2012

Mailing Address 25000 Portofino Cir.
#129

City: Palm Beach Gardens State: FL Zip Code: 33148-1293

Amount: 14918.33

Transaction ID : SE.4340

Purpose of Expenditure: Mailer

Category/Type: 006

Office Sought: ☒ House ☐ Senate ☐ President State: IL District: 02

Name of Federal Candidate Supported or Opposed by Expenditure:
DEBORAH 'DEBBIE' HALVORSON

Check One: ☒ Support ☐ Oppose

Calendar Year-To-Date Per Election for Office Sought 2012: 30517.93

Disbursement For: ☒ Primary ☐ General ☐ Other (specify) ▶

(a) **SUBTOTAL** of Itemized Independent Expenditures ▶ 15084.99

(b) **SUBTOTAL** of Unitemized Independent Expenditures ▶

(c) **TOTAL** Independent Expenditures ▶

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Jonathan Martin *[Electronically Filed]*
Signature

Date 04 / 20 / 2012

SCHEDULE E (FEC Form 3X)
ITEMIZED INDEPENDENT EXPENDITURES

NAME OF COMMITTEE (In Full)
CAMPAIGN FOR PRIMARY ACCOUNTABILITY INC

FEC IDENTIFICATION NUMBER ▼
C C00502849

Check if ☐ 24-hour report ☐ 48-hour report ☐ New report ☐ Amends report filed on MM / DD / YYYY

Full Name (Last, First, Middle Initial) of Payee
CMF Communications

Date: 03 / 03 / 2012

Mailing Address 25000 Portofino Cir.
#129

City: Palm Beach Gardens State: FL Zip Code: 33148-1293

Amount: 1931.55

Transaction ID : SE.4351

Purpose of Expenditure: Automated Calls

Category/Type: 004

Office Sought: ☒ House ☐ Senate ☐ President State: OH District: 09

Name of Federal Candidate Supported or Opposed by Expenditure:
DENNIS J KUCINICH

Check One: ☒ Support ☐ Oppose

Calendar Year-To-Date Per Election for Office Sought: 107506.51

Disbursement For: ☒ Primary ☐ General 2012 ☐ Other (specify) ▶

Full Name (Last, First, Middle Initial) of Payee
CMF Communications

Date: 03 / 03 / 2012

Mailing Address 25000 Portofino Cir.
#129

City: Palm Beach Gardens State: FL Zip Code: 33148-1293

Amount: 3377.36

Transaction ID : SE.4353

Purpose of Expenditure: Facebook Adervtisements

Category/Type: 004

Office Sought: ☒ House ☐ Senate ☐ President State: OH District: 09

Name of Federal Candidate Supported or Opposed by Expenditure:
DENNIS J KUCINICH

Check One: ☒ Support ☐ Oppose

Calendar Year-To-Date Per Election for Office Sought: 110883.87

Disbursement For: ☒ Primary ☐ General 2012 ☐ Other (specify) ▶

(a) **SUBTOTAL** of Itemized Independent Expenditures ▶ 5308.91

(b) **SUBTOTAL** of Unitemized Independent Expenditures ▶

(c) **TOTAL** Independent Expenditures ▶

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.

Jonathan Martin *[Electronically Filed]*
Signature

Date 04 / 20 / 2012

SCHEDULE E (FEC Form 3X)
ITEMIZED INDEPENDENT EXPENDITURES

NAME OF COMMITTEE (In Full)
CAMPAIGN FOR PRIMARY ACCOUNTABILITY INC

FEC IDENTIFICATION NUMBER ▼
C C00502849

Check if ☐ 24-hour report ☐ 48-hour report ☐ New report ☐ Amends report filed on MM / DD / YYYY

Full Name (Last, First, Middle Initial) of Payee
CMF Communications

Date: 03 / 03 / 2012

Mailing Address 25000 Portofino Cir.
#129

City: Palm Beach Gardens State: FL Zip Code: 33148-1293

Amount: 850.36

Transaction ID : SE.4354

Purpose of Expenditure: Facebook Advertisment

Category/Type: 004

Office Sought: ☒ House ☐ Senate ☐ President State: OH District: 09

Name of Federal Candidate Supported or Opposed by Expenditure:
MARCY C HON. KAPTUR

Check One: ☐ Support ☒ Oppose

Calendar Year-To-Date Per Election for Office Sought: 111734.23

Disbursement For: ☒ Primary ☐ General 2012 ☐ Other (specify) ▶

Full Name (Last, First, Middle Initial) of Payee
CMF Communications

Date: 03 / 03 / 2012

Mailing Address 25000 Portofino Cir.
#129

City: Palm Beach Gardens State: FL Zip Code: 33148-1293

Amount: 166.66

Transaction ID : SE.4362

Purpose of Expenditure: Automated Robo Calls

Category/Type: 004

Office Sought: ☒ House ☐ Senate ☐ President State: OH District: 09

Name of Federal Candidate Supported or Opposed by Expenditure:
DENNIS J KUCINICH

Check One: ☒ Support ☐ Oppose

Calendar Year-To-Date Per Election for Office Sought: 136900.89

Disbursement For: ☒ Primary ☐ General 2012 ☐ Other (specify) ▶

(a) **SUBTOTAL** of Itemized Independent Expenditures ▶ 1017.02

(b) **SUBTOTAL** of Unitemized Independent Expenditures ▶

(c) **TOTAL** Independent Expenditures ▶

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.

Jonathan Martin *[Electronically Filed]*
Signature

Date 04 / 20 / 2012

SCHEDULE E (FEC Form 3X)
ITEMIZED INDEPENDENT EXPENDITURES

NAME OF COMMITTEE (In Full)
CAMPAIGN FOR PRIMARY ACCOUNTABILITY INC

FEC IDENTIFICATION NUMBER ▼
C C00502849

Check if ☐ 24-hour report ☐ 48-hour report ☐ New report ☐ Amends report filed on MM / DD / YYYY

Full Name (Last, First, Middle Initial) of Payee
CMF Communications

Date: 03 / 03 / 2012

Mailing Address 25000 Portofino Cir.
#129

City: Palm Beach Gardens State: FL Zip Code: 33148-1293

Amount: 12539.42

Transaction ID : SE.4364

Purpose of Expenditure: Mailer supporting Halvorson

Category/Type: 006

Office Sought: ☒ House ☐ Senate ☐ President State: IL District: 02

Name of Federal Candidate Supported or Opposed by Expenditure:
DEBORAH 'DEBBIE' HALVORSON

Check One: ☒ Support ☐ Oppose

Calendar Year-To-Date Per Election for Office Sought 2012: 43057.35

Disbursement For: ☒ Primary ☐ General ☐ Other (specify) ▶

Full Name (Last, First, Middle Initial) of Payee
CMF Communications

Date: 03 / 05 / 2012

Mailing Address 25000 Portofino Cir.
#129

City: Palm Beach Gardens State: FL Zip Code: 33148-1293

Amount: 166.66

Transaction ID : SE.4383

Purpose of Expenditure: Email Advertisement

Category/Type: 004

Office Sought: ☒ House ☐ Senate ☐ President State: OH District: 09

Name of Federal Candidate Supported or Opposed by Expenditure:
DENNIS J KUCINICH

Check One: ☒ Support ☐ Oppose

Calendar Year-To-Date Per Election for Office Sought 2012: 137067.55

Disbursement For: ☒ Primary ☐ General ☐ Other (specify) ▶

(a) **SUBTOTAL** of Itemized Independent Expenditures ▶ 12706.08

(b) **SUBTOTAL** of Unitemized Independent Expenditures ▶

(c) **TOTAL** Independent Expenditures ▶

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Jonathan Martin *[Electronically Filed]*
Signature

Date 04 / 20 / 2012

SCHEDULE E (FEC Form 3X)
ITEMIZED INDEPENDENT EXPENDITURES

NAME OF COMMITTEE (In Full)
CAMPAIGN FOR PRIMARY ACCOUNTABILITY INC

FEC IDENTIFICATION NUMBER ▼
C C00502849

Check if ☐ 24-hour report ☐ 48-hour report ☐ New report ☐ Amends report filed on M M / D D / Y Y Y Y

Full Name (Last, First, Middle Initial) of Payee
CMF Communications

Date: 03 / 08 / 2012

Mailing Address 25000 Portofino Cir.
#129

City: Palm Beach Gardens State: FL Zip Code: 33148-1293

Amount: 14798.33

Transaction ID : SE.4444

Purpose of Expenditure: Direct Mail Piece

Category/Type: 006

Office Sought: ☒ House ☐ Senate ☐ President State: IL District: 02

Name of Federal Candidate Supported or Opposed by Expenditure:
JESSE JR JACKSON

Check One: ☐ Support ☒ Oppose

Calendar Year-To-Date Per Election for Office Sought: 57855.68

Disbursement For: ☒ Primary ☐ General 2012 ☐ Other (specify) ▶

Full Name (Last, First, Middle Initial) of Payee
CMF Communications

Date: 03 / 08 / 2012

Mailing Address 25000 Portofino Cir.
#129

City: Palm Beach Gardens State: FL Zip Code: 33148-1293

Amount: 5000.00

Transaction ID : SE.4447

Purpose of Expenditure: Online advertisements

Category/Type: 004

Office Sought: ☒ House ☐ Senate ☐ President State: IL District: 02

Name of Federal Candidate Supported or Opposed by Expenditure:
JESSE JR JACKSON

Check One: ☐ Support ☒ Oppose

Calendar Year-To-Date Per Election for Office Sought: 62855.68

Disbursement For: ☒ Primary ☐ General 2012 ☐ Other (specify) ▶

(a) **SUBTOTAL** of Itemized Independent Expenditures ▶ 19798.33

(b) **SUBTOTAL** of Unitemized Independent Expenditures ▶

(c) **TOTAL** Independent Expenditures ▶

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Jonathan Martin *[Electronically Filed]*
Signature

Date 04 / 20 / 2012

SCHEDULE E (FEC Form 3X)
ITEMIZED INDEPENDENT EXPENDITURES

NAME OF COMMITTEE (In Full)
CAMPAIGN FOR PRIMARY ACCOUNTABILITY INC

FEC IDENTIFICATION NUMBER ▼
C C00502849

Check if ☐ 24-hour report ☐ 48-hour report ☐ New report ☐ Amends report filed on MM / DD / YYYY

Full Name (Last, First, Middle Initial) of Payee
CMF Communications

Date 03 / 09 / 2012

Mailing Address 25000 Portofino Cir.
#129

City Palm Beach Gardens State FL Zip Code 33148-1293

Amount 4000.00

Transaction ID : SE.4460

Purpose of Expenditure
Online advertising

Category/Type 004

Office Sought: ☒ House ☐ Senate ☐ President State: IL District: 02

Name of Federal Candidate Supported or Opposed by Expenditure:
DEBORAH 'DEBBIE' HALVORSON

Check One: ☒ Support ☐ Oppose

Calendar Year-To-Date Per Election for Office Sought 66855.68

Disbursement For: ☒ Primary ☐ General
2012 ☐ Other (specify) ▶

Full Name (Last, First, Middle Initial) of Payee
CMF Communications

Date 03 / 13 / 2012

Mailing Address 25000 Portofino Cir.
#129

City Palm Beach Gardens State FL Zip Code 33148-1293

Amount 9521.06

Transaction ID : SE.4523

Purpose of Expenditure
Email communication

Category/Type 004

Office Sought: ☒ House ☐ Senate ☐ President State: IL District: 02

Name of Federal Candidate Supported or Opposed by Expenditure:
DEBORAH 'DEBBIE' HALVORSON

Check One: ☒ Support ☐ Oppose

Calendar Year-To-Date Per Election for Office Sought 76376.74

Disbursement For: ☒ Primary ☐ General
2012 ☐ Other (specify) ▶

(a) **SUBTOTAL** of Itemized Independent Expenditures ▶ 13521.06

(b) **SUBTOTAL** of Unitemized Independent Expenditures ▶

(c) **TOTAL** Independent Expenditures ▶

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Jonathan Martin *[Electronically Filed]*
Signature

Date 04 / 20 / 2012

SCHEDULE E (FEC Form 3X)
ITEMIZED INDEPENDENT EXPENDITURES

NAME OF COMMITTEE (In Full)
CAMPAIGN FOR PRIMARY ACCOUNTABILITY INC

FEC IDENTIFICATION NUMBER ▼
C C00502849

Check if ☐ 24-hour report ☐ 48-hour report ☐ New report ☐ Amends report filed on MM / DD / YYYY

Full Name (Last, First, Middle Initial) of Payee
CMF Communications

Date 03 / 15 / 2012

Mailing Address 25000 Portofino Cir.
#129

City Palm Beach Gardens State FL Zip Code 33148-1293

Amount 4734.00

Transaction ID : SE.4535

Purpose of Expenditure
Automated telephone robo calls

Category/Type 004

Office Sought: ☒ House ☐ Senate ☐ President State: IL District: 02

Name of Federal Candidate Supported or Opposed by Expenditure:
DEBORAH 'DEBBIE' HALVORSON

Check One: ☒ Support ☐ Oppose

Calendar Year-To-Date Per Election for Office Sought 81110.74

Disbursement For: ☒ Primary ☐ General
2012 ☐ Other (specify) ▶

Full Name (Last, First, Middle Initial) of Payee
CMF Communications

Date 03 / 15 / 2012

Mailing Address 25000 Portofino Cir.
#129

City Palm Beach Gardens State FL Zip Code 33148-1293

Amount 1999.06

Transaction ID : SE.4537

Purpose of Expenditure
Email communication

Category/Type 004

Office Sought: ☒ House ☐ Senate ☐ President State: IL District: 02

Name of Federal Candidate Supported or Opposed by Expenditure:
JESSE JR JACKSON

Check One: ☐ Support ☒ Oppose

Calendar Year-To-Date Per Election for Office Sought 83109.80

Disbursement For: ☒ Primary ☐ General
2012 ☐ Other (specify) ▶

(a) **SUBTOTAL** of Itemized Independent Expenditures ▶ 6733.06

(b) **SUBTOTAL** of Unitemized Independent Expenditures ▶

(c) **TOTAL** Independent Expenditures ▶

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Jonathan Martin *[Electronically Filed]*
Signature

Date 04 / 20 / 2012

SCHEDULE E (FEC Form 3X)
ITEMIZED INDEPENDENT EXPENDITURES

NAME OF COMMITTEE (In Full)
CAMPAIGN FOR PRIMARY ACCOUNTABILITY INC

FEC IDENTIFICATION NUMBER ▼
C C00502849

Check if ☐ 24-hour report ☐ 48-hour report ☐ New report ☐ Amends report filed on MM / DD / YYYY

Full Name (Last, First, Middle Initial) of Payee
CMF Communications

Date 03 / 17 / 2012

Mailing Address 25000 Portofino Cir.
#129

City Palm Beach Gardens State FL Zip Code 33148-1293

Amount 4162.44

Transaction ID : SE.4553

Purpose of Expenditure
Auotmated telephone calls

Category/Type 004

Office Sought: ☒ House ☐ Senate ☐ President State: IL District: 02

Name of Federal Candidate Supported or Opposed by Expenditure:
DEBORAH 'DEBBIE' HALVORSON

Check One: ☒ Support ☐ Oppose

Calendar Year-To-Date Per Election for Office Sought 87272.24

Disbursement For: ☒ Primary ☐ General
2012 ☐ Other (specify) ▶

Full Name (Last, First, Middle Initial) of Payee
CMF Communications

Date 03 / 17 / 2012

Mailing Address 25000 Portofino Cir.
#129

City Palm Beach Gardens State FL Zip Code 33148-1293

Amount 1011.62

Transaction ID : SE.4555

Purpose of Expenditure
Email communication

Category/Type 004

Office Sought: ☒ House ☐ Senate ☐ President State: IL District: 02

Name of Federal Candidate Supported or Opposed by Expenditure:
JESSE JR JACKSON

Check One: ☐ Support ☒ Oppose

Calendar Year-To-Date Per Election for Office Sought 88283.86

Disbursement For: ☒ Primary ☐ General
2012 ☐ Other (specify) ▶

(a) **SUBTOTAL** of Itemized Independent Expenditures ▶ 5174.06

(b) **SUBTOTAL** of Unitemized Independent Expenditures ▶

(c) **TOTAL** Independent Expenditures ▶

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.

Jonathan Martin *[Electronically Filed]*
Signature

Date 04 / 20 / 2012

SCHEDULE E (FEC Form 3X)
ITEMIZED INDEPENDENT EXPENDITURES

NAME OF COMMITTEE (In Full)
CAMPAIGN FOR PRIMARY ACCOUNTABILITY INC

FEC IDENTIFICATION NUMBER ▼
C C00502849

Check if ☐ 24-hour report ☐ 48-hour report ☐ New report ☐ Amends report filed on MM / DD / YYYY

Full Name (Last, First, Middle Initial) of Payee
CMF Communications

Date 03 / 19 / 2012

Mailing Address 25000 Portofino Cir.
#129

Amount 1037.58

City Palm Beach Gardens | State FL | Zip Code 33148-1293

Transaction ID : SE.4652

Purpose of Expenditure
Email communication

Category/Type 004

Office Sought: ☒ House ☐ Senate ☐ President State: IL District: 02

Name of Federal Candidate Supported or Opposed by Expenditure:
DEBORAH 'DEBBIE' HALVORSON

Check One: ☒ Support ☐ Oppose

Calendar Year-To-Date Per Election for Office Sought 89321.44

Disbursement For: ☒ Primary ☐ General 2012 ☐ Other (specify) ▶

Full Name (Last, First, Middle Initial) of Payee
Dialing Services, LLC

Date 03 / 10 / 2012

Mailing Address 8 Riverside Drive

Amount 1657.74

City Roswell | State NM | Zip Code 88201

Transaction ID : SE.4466

Purpose of Expenditure
Automated phone calls

Category/Type 004

Office Sought: ☒ House ☐ Senate ☐ President State: AL District: 01

Name of Federal Candidate Supported or Opposed by Expenditure:
JO BONNER

Check One: ☐ Support ☒ Oppose

Calendar Year-To-Date Per Election for Office Sought 118254.91

Disbursement For: ☒ Primary ☐ General 2012 ☐ Other (specify) ▶

(a) **SUBTOTAL** of Itemized Independent Expenditures ▶ 2695.32

(b) **SUBTOTAL** of Unitemized Independent Expenditures ▶

(c) **TOTAL** Independent Expenditures ▶

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.

Jonathan Martin *[Electronically Filed]*
Signature

Date 04 / 20 / 2012

SCHEDULE E (FEC Form 3X)
ITEMIZED INDEPENDENT EXPENDITURES

NAME OF COMMITTEE (In Full)
CAMPAIGN FOR PRIMARY ACCOUNTABILITY INC

FEC IDENTIFICATION NUMBER ▼
C C00502849

Check if ☐ 24-hour report ☐ 48-hour report ☐ New report ☐ Amends report filed on MM / DD / YYYY

Full Name (Last, First, Middle Initial) of Payee
Dialing Services, LLC

Mailing Address 8 Riverside Drive

City Roswell State NM Zip Code 88201

Date 03 / 10 / 2012

Amount 6468.00

Transaction ID : SE.4473

Purpose of Expenditure
Automated phone calls

Category/Type 004

Office Sought: ☒ House ☐ Senate ☐ President State: AL District: 06

Name of Federal Candidate Supported or Opposed by Expenditure:
SPENCER T. BACHUS

Check One: ☐ Support ☒ Oppose

Calendar Year-To-Date Per Election for Office Sought 196872.30

Disbursement For: ☒ Primary ☐ General 2012 ☐ Other (specify) ▶

Full Name (Last, First, Middle Initial) of Payee
Dialing Services, LLC

Mailing Address 8 Riverside Drive

City Roswell State NM Zip Code 88201

Date 03 / 11 / 2012

Amount 1657.74

Transaction ID : SE.4468

Purpose of Expenditure
Automated phone calls

Category/Type 004

Office Sought: ☒ House ☐ Senate ☐ President State: AL District: 01

Name of Federal Candidate Supported or Opposed by Expenditure:
JO BONNER

Check One: ☐ Support ☒ Oppose

Calendar Year-To-Date Per Election for Office Sought 119912.65

Disbursement For: ☒ Primary ☐ General 2012 ☐ Other (specify) ▶

(a) **SUBTOTAL** of Itemized Independent Expenditures ▶ 8125.74

(b) **SUBTOTAL** of Unitemized Independent Expenditures ▶

(c) **TOTAL** Independent Expenditures ▶

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Jonathan Martin *[Electronically Filed]*
Signature

Date 04 / 20 / 2012

SCHEDULE E (FEC Form 3X)
ITEMIZED INDEPENDENT EXPENDITURES

NAME OF COMMITTEE (In Full)
CAMPAIGN FOR PRIMARY ACCOUNTABILITY INC

FEC IDENTIFICATION NUMBER ▼
C C00502849

Check if ☐ 24-hour report ☐ 48-hour report ☐ New report ☐ Amends report filed on MM / DD / YYYY

Full Name (Last, First, Middle Initial) of Payee
Dialing Services, LLC

Mailing Address 8 Riverside Drive

City Roswell State NM Zip Code 88201

Date 03 / 11 / 2012

Amount 3234.00

Transaction ID : SE.4471

Purpose of Expenditure
Automated phone calls

Category/Type 004

Office Sought: ☒ House ☐ Senate ☐ President State: AL District: 06

Name of Federal Candidate Supported or Opposed by Expenditure:
SPENCER T. BACHUS

Check One: ☐ Support ☒ Oppose

Calendar Year-To-Date Per Election for Office Sought 200106.30

Disbursement For: ☒ Primary ☐ General
2012 ☐ Other (specify) ▶

Full Name (Last, First, Middle Initial) of Payee
Dialing Services, LLC

Mailing Address 8 Riverside Drive

City Roswell State NM Zip Code 88201

Date 03 / 12 / 2012

Amount 1667.19

Transaction ID : SE.4511

Purpose of Expenditure
Automated telephone calls

Category/Type 004

Office Sought: ☒ House ☐ Senate ☐ President State: AL District: 01

Name of Federal Candidate Supported or Opposed by Expenditure:
JO BONNER

Check One: ☐ Support ☒ Oppose

Calendar Year-To-Date Per Election for Office Sought 123679.84

Disbursement For: ☒ Primary ☐ General
2012 ☐ Other (specify) ▶

(a) **SUBTOTAL** of Itemized Independent Expenditures ▶ 4901.19

(b) **SUBTOTAL** of Unitemized Independent Expenditures ▶

(c) **TOTAL** Independent Expenditures ▶

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Jonathan Martin *[Electronically Filed]*
Signature

Date 04 / 20 / 2012

SCHEDULE E (FEC Form 3X)
ITEMIZED INDEPENDENT EXPENDITURES

NAME OF COMMITTEE (In Full)
CAMPAIGN FOR PRIMARY ACCOUNTABILITY INC

FEC IDENTIFICATION NUMBER ▼
C C00502849

Check if ☐ 24-hour report ☐ 48-hour report ☐ New report ☐ Amends report filed on M M / D D / Y Y Y Y

Full Name (Last, First, Middle Initial) of Payee
Dialing Services, LLC

Date: 03 / 12 / 2012

Mailing Address 8 Riverside Drive

Amount: 2402.86

City: Roswell State: NM Zip Code: 88201

Transaction ID : SE.4515

Purpose of Expenditure: Automated telephone calls

Category/Type: 004

Office Sought: ☒ House ☐ Senate ☐ President State: AL District: 06

Name of Federal Candidate Supported or Opposed by Expenditure:
SPENCER T. BACHUS

Check One: ☐ Support ☒ Oppose

Calendar Year-To-Date Per Election for Office Sought: 203109.16

Disbursement For: ☒ Primary ☐ General 2012 ☐ Other (specify) ▶

Full Name (Last, First, Middle Initial) of Payee
Fortune Media, Inc.

Date: 03 / 03 / 2012

Mailing Address 527 Avenue B

Amount: 25000.00

City: Redondo Beach State: CA Zip Code: 90277-4183

Transaction ID : SE.4357

Purpose of Expenditure: Television Advertisement

Category/Type: 004

Office Sought: ☒ House ☐ Senate ☐ President State: OH District: 09

Name of Federal Candidate Supported or Opposed by Expenditure:
DENNIS J KUCINICH

Check One: ☒ Support ☐ Oppose

Calendar Year-To-Date Per Election for Office Sought: 136734.23

Disbursement For: ☒ Primary ☐ General 2012 ☐ Other (specify) ▶

(a) **SUBTOTAL** of Itemized Independent Expenditures ▶ 27402.86

(b) **SUBTOTAL** of Unitemized Independent Expenditures ▶

(c) **TOTAL** Independent Expenditures ▶

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Jonathan Martin *[Electronically Filed]*
Signature

Date 04 / 20 / 2012

SCHEDULE E (FEC Form 3X)
ITEMIZED INDEPENDENT EXPENDITURES

NAME OF COMMITTEE (In Full)
CAMPAIGN FOR PRIMARY ACCOUNTABILITY INC

FEC IDENTIFICATION NUMBER ▼
C C00502849

Check if ☐ 24-hour report ☐ 48-hour report ☐ New report ☐ Amends report filed on M M / D D / Y Y Y Y

Full Name (Last, First, Middle Initial) of Payee
Katz Media Group, Inc.

Date: 03 / 19 / 2012

Mailing Address 125 West 55th St.

Amount: 10000.00

City: New York | State: NY | Zip Code: 10019

Transaction ID : SE.4644

Purpose of Expenditure: Online advertisements

Category/Type: 004

Office Sought: ☒ House ☐ Senate ☐ President | State: IL | District: 16

Name of Federal Candidate Supported or Opposed by Expenditure:
DONALD A. MANZULLO

Check One: ☐ Support ☒ Oppose

Calendar Year-To-Date Per Election for Office Sought: 222131.68

Disbursement For: ☒ Primary ☐ General
2012 ☐ Other (specify) ▶

Full Name (Last, First, Middle Initial) of Payee
Lewis Advertising

Date: 03 / 08 / 2012

Mailing Address PO Box 544

Amount: 20000.00

City: Wetumpka | State: FL | Zip Code: 36092

Transaction ID : SE.4423

Purpose of Expenditure: Radio Advertisement

Category/Type: 004

Office Sought: ☒ House ☐ Senate ☐ President | State: AL | District: 01

Name of Federal Candidate Supported or Opposed by Expenditure:
JO BONNER

Check One: ☐ Support ☒ Oppose

Calendar Year-To-Date Per Election for Office Sought: 90341.36

Disbursement For: ☒ Primary ☐ General
2012 ☐ Other (specify) ▶

(a) **SUBTOTAL** of Itemized Independent Expenditures ▶ 30000.00

(b) **SUBTOTAL** of Unitemized Independent Expenditures ▶

(c) **TOTAL** Independent Expenditures ▶

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Jonathan Martin *[Electronically Filed]*
Signature

Date 04 / 20 / 2012

SCHEDULE E (FEC Form 3X)
ITEMIZED INDEPENDENT EXPENDITURES

NAME OF COMMITTEE (In Full)
CAMPAIGN FOR PRIMARY ACCOUNTABILITY INC

FEC IDENTIFICATION NUMBER ▼
C C00502849

Check if ☐ 24-hour report ☐ 48-hour report ☐ New report ☐ Amends report filed on M M / D D / Y Y Y Y

Full Name (Last, First, Middle Initial) of Payee
Lewis Advertising

Mailing Address PO Box 544

City: Wetumpka State: FL Zip Code: 36092

Date: 03 / 16 / 2012

Amount: 35000.00

Transaction ID : SE.4542

Purpose of Expenditure: TV Broadcast

Category/Type: 004

Office Sought: ☒ House ☐ Senate ☐ President State: IL District: 16

Name of Federal Candidate Supported or Opposed by Expenditure:
DONALD A. MANZULLO

Check One: ☐ Support ☒ Oppose

Calendar Year-To-Date Per Election for Office Sought: 169131.68

Disbursement For: ☒ Primary ☐ General 2012 ☐ Other (specify) ▶

Full Name (Last, First, Middle Initial) of Payee
Lewis Advertising

Mailing Address PO Box 544

City: Wetumpka State: FL Zip Code: 36092

Date: 03 / 17 / 2012

Amount: 25000.00

Transaction ID : SE.4544

Purpose of Expenditure: Television advertisement

Category/Type: 004

Office Sought: ☒ House ☐ Senate ☐ President State: IL District: 16

Name of Federal Candidate Supported or Opposed by Expenditure:
DONALD A. MANZULLO

Check One: ☐ Support ☒ Oppose

Calendar Year-To-Date Per Election for Office Sought: 194131.68

Disbursement For: ☒ Primary ☐ General 2012 ☐ Other (specify) ▶

(a) **SUBTOTAL** of Itemized Independent Expenditures ▶ 60000.00

(b) **SUBTOTAL** of Unitemized Independent Expenditures ▶

(c) **TOTAL** Independent Expenditures ▶

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Jonathan Martin *[Electronically Filed]*
Signature

Date 04 / 20 / 2012

SCHEDULE E (FEC Form 3X)
ITEMIZED INDEPENDENT EXPENDITURES

NAME OF COMMITTEE (In Full)
CAMPAIGN FOR PRIMARY ACCOUNTABILITY INC

FEC IDENTIFICATION NUMBER ▼
C C00502849

Check if ☐ 24-hour report ☐ 48-hour report ☐ New report ☐ Amends report filed on MM / DD / YYYY

Full Name (Last, First, Middle Initial) of Payee
Lewis Advertising

Mailing Address PO Box 544

City: Wetumpka State: FL Zip Code: 36092

Date: 03 / 17 / 2012

Amount: 18000.00

Transaction ID : SE.4547

Purpose of Expenditure: Radio advertisement

Category/Type: 004

Office Sought: ☒ House ☐ Senate ☐ President State: IL District: 16

Name of Federal Candidate Supported or Opposed by Expenditure:
DONALD A. MANZULLO

Check One: ☐ Support ☒ Oppose

Calendar Year-To-Date Per Election for Office Sought: 212131.68

Disbursement For: ☒ Primary ☐ General 2012 ☐ Other (specify) ▶

Full Name (Last, First, Middle Initial) of Payee
Message & Media

Mailing Address 3101 Lee Highway
Suite 18 #136

City: Bristol State: VA Zip Code: 24202

Date: 03 / 07 / 2012

Amount: 600.00

Transaction ID : SE.4388

Purpose of Expenditure: Email communications

Category/Type: 004

Office Sought: ☒ House ☐ Senate ☐ President State: AL District: 06

Name of Federal Candidate Supported or Opposed by Expenditure:
SPENCER T. BACHUS

Check One: ☐ Support ☒ Oppose

Calendar Year-To-Date Per Election for Office Sought: 53571.50

Disbursement For: ☒ Primary ☐ General 2012 ☐ Other (specify) ▶

(a) **SUBTOTAL** of Itemized Independent Expenditures ▶ 18600.00

(b) **SUBTOTAL** of Unitemized Independent Expenditures ▶

(c) **TOTAL** Independent Expenditures ▶

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Jonathan Martin *[Electronically Filed]*
Signature

Date 04 / 20 / 2012

SCHEDULE E (FEC Form 3X)
ITEMIZED INDEPENDENT EXPENDITURES

NAME OF COMMITTEE (In Full)
CAMPAIGN FOR PRIMARY ACCOUNTABILITY INC

FEC IDENTIFICATION NUMBER ▼
C C00502849

Check if ☐ 24-hour report ☐ 48-hour report ☐ New report ☐ Amends report filed on MM / DD / YYYY

Full Name (Last, First, Middle Initial) of Payee
Message & Media

Date 03 / 07 / 2012

Mailing Address 3101 Lee Highway
Suite 18 #136

Amount 600.00

City Bristol State VA Zip Code 24202

Transaction ID : SE.4390

Purpose of Expenditure
Email communications

Category/Type 004

Office Sought: ☒ House ☐ Senate ☐ President State: AL District: 06

Name of Federal Candidate Supported or Opposed by Expenditure:
SPENCER T. BACHUS

Check One: ☐ Support ☒ Oppose

Calendar Year-To-Date Per Election for Office Sought 54171.50

Disbursement For: ☒ Primary ☐ General
2012 ☐ Other (specify) ▶

Full Name (Last, First, Middle Initial) of Payee
Message & Media

Date 03 / 07 / 2012

Mailing Address 3101 Lee Highway
Suite 18 #136

Amount 600.00

City Bristol State VA Zip Code 24202

Transaction ID : SE.4393

Purpose of Expenditure
Email communications

Category/Type 004

Office Sought: ☒ House ☐ Senate ☐ President State: AL District: 01

Name of Federal Candidate Supported or Opposed by Expenditure:
JO BONNER

Check One: ☐ Support ☒ Oppose

Calendar Year-To-Date Per Election for Office Sought 21398.74

Disbursement For: ☒ Primary ☐ General
2012 ☐ Other (specify) ▶

(a) **SUBTOTAL** of Itemized Independent Expenditures ▶ 1200.00

(b) **SUBTOTAL** of Unitemized Independent Expenditures ▶

(c) **TOTAL** Independent Expenditures ▶

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Jonathan Martin *[Electronically Filed]*
Signature

Date 04 / 20 / 2012

SCHEDULE E (FEC Form 3X)
ITEMIZED INDEPENDENT EXPENDITURES

NAME OF COMMITTEE (In Full)
CAMPAIGN FOR PRIMARY ACCOUNTABILITY INC

FEC IDENTIFICATION NUMBER ▼
C C00502849

Check if ☐ 24-hour report ☐ 48-hour report ☐ New report ☐ Amends report filed on MM / DD / YYYY

Full Name (Last, First, Middle Initial) of Payee
Message & Media

Date 03 / 07 / 2012

Mailing Address 3101 Lee Highway
Suite 18 #136

City Bristol State VA Zip Code 24202

Amount 600.00

Transaction ID : SE.4395

Purpose of Expenditure
Email communications

Category/Type 004

Office Sought: ☒ House ☐ Senate ☐ President State: AL District: 01

Name of Federal Candidate Supported or Opposed by Expenditure:
JO BONNER

Check One: ☐ Support ☒ Oppose

Calendar Year-To-Date Per Election for Office Sought 21998.74

Disbursement For: ☒ Primary ☐ General 2012 ☐ Other (specify) ▶

Full Name (Last, First, Middle Initial) of Payee
Message & Media

Date 03 / 08 / 2012

Mailing Address 3101 Lee Highway
Suite 18 #136

City Bristol State VA Zip Code 24202

Amount 600.00

Transaction ID : SE.4398

Purpose of Expenditure
Email communications

Category/Type 004

Office Sought: ☒ House ☐ Senate ☐ President State: IL District: 16

Name of Federal Candidate Supported or Opposed by Expenditure:
DONALD A. MANZULLO

Check One: ☐ Support ☒ Oppose

Calendar Year-To-Date Per Election for Office Sought 600.00

Disbursement For: ☒ Primary ☐ General 2012 ☐ Other (specify) ▶

(a) **SUBTOTAL** of Itemized Independent Expenditures ▶ 1200.00

(b) **SUBTOTAL** of Unitemized Independent Expenditures ▶

(c) **TOTAL** Independent Expenditures ▶

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Jonathan Martin *[Electronically Filed]*
Signature

Date 04 / 20 / 2012

SCHEDULE E (FEC Form 3X)
ITEMIZED INDEPENDENT EXPENDITURES

NAME OF COMMITTEE (In Full)
CAMPAIGN FOR PRIMARY ACCOUNTABILITY INC

FEC IDENTIFICATION NUMBER ▼
C C00502849

Check if ☐ 24-hour report ☐ 48-hour report ☐ New report ☐ Amends report filed on MM / DD / YYYY

Full Name (Last, First, Middle Initial) of Payee
Message & Media

Mailing Address 3101 Lee Highway
Suite 18 #136

City: Bristol State: VA Zip Code: 24202

Date: 03 / 09 / 2012

Amount: 600.00

Transaction ID : SE.4402

Purpose of Expenditure: Email communications

Category/Type: 004

Office Sought: ☒ House ☐ Senate ☐ President State: AL District: 06

Name of Federal Candidate Supported or Opposed by Expenditure:
SPENCER T. BACHUS

Check One: ☐ Support ☒ Oppose

Calendar Year-To-Date Per Election for Office Sought: 185404.30

Disbursement For: ☒ Primary ☐ General 2012 ☐ Other (specify) ▶

Full Name (Last, First, Middle Initial) of Payee
Message & Media

Mailing Address 3101 Lee Highway
Suite 18 #136

City: Bristol State: VA Zip Code: 24202

Date: 03 / 10 / 2012

Amount: 600.00

Transaction ID : SE.4457

Purpose of Expenditure: Email communication

Category/Type: 004

Office Sought: ☒ House ☐ Senate ☐ President State: AL District: 01

Name of Federal Candidate Supported or Opposed by Expenditure:
JO BONNER

Check One: ☐ Support ☒ Oppose

Calendar Year-To-Date Per Election for Office Sought: 116597.17

Disbursement For: ☒ Primary ☐ General 2012 ☐ Other (specify) ▶

(a) **SUBTOTAL** of Itemized Independent Expenditures ▶ 1200.00

(b) **SUBTOTAL** of Unitemized Independent Expenditures ▶

(c) **TOTAL** Independent Expenditures ▶

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Jonathan Martin *[Electronically Filed]*
Signature

Date 04 / 20 / 2012

SCHEDULE E (FEC Form 3X)
ITEMIZED INDEPENDENT EXPENDITURES

NAME OF COMMITTEE (In Full)
CAMPAIGN FOR PRIMARY ACCOUNTABILITY INC

FEC IDENTIFICATION NUMBER ▼
C C00502849

Check if ☐ 24-hour report ☐ 48-hour report ☐ New report ☐ Amends report filed on MM / DD / YYYY

Full Name (Last, First, Middle Initial) of Payee
Message & Media

Date 03 / 12 / 2012

Mailing Address 3101 Lee Highway
Suite 18 #136

Amount 600.00

City Bristol | State VA | Zip Code 24202

Transaction ID : SE.4498

Purpose of Expenditure
Email communication

Category/Type 004

Office Sought: ☒ House ☐ Senate ☐ President
State: AL
District: 01

Name of Federal Candidate Supported or Opposed by Expenditure:
JO BONNER

Check One: ☐ Support ☒ Oppose

Calendar Year-To-Date Per Election for Office Sought 2012 122012.65

Disbursement For: ☒ Primary ☐ General ☐ Other (specify) ▶

Full Name (Last, First, Middle Initial) of Payee
Message & Media

Date 03 / 12 / 2012

Mailing Address 3101 Lee Highway
Suite 18 #136

Amount 600.00

City Bristol | State VA | Zip Code 24202

Transaction ID : SE.4502

Purpose of Expenditure
Email communication

Category/Type 004

Office Sought: ☒ House ☐ Senate ☐ President
State: AL
District: 06

Name of Federal Candidate Supported or Opposed by Expenditure:
SPENCER T. BACHUS

Check One: ☐ Support ☒ Oppose

Calendar Year-To-Date Per Election for Office Sought 2012 200706.30

Disbursement For: ☒ Primary ☐ General ☐ Other (specify) ▶

(a) **SUBTOTAL** of Itemized Independent Expenditures ▶ 1200.00

(b) **SUBTOTAL** of Unitemized Independent Expenditures ▶

(c) **TOTAL** Independent Expenditures ▶

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.

Jonathan Martin *[Electronically Filed]*
Signature

Date 04 / 20 / 2012

SCHEDULE E (FEC Form 3X)
ITEMIZED INDEPENDENT EXPENDITURES

NAME OF COMMITTEE (In Full)
CAMPAIGN FOR PRIMARY ACCOUNTABILITY INC

FEC IDENTIFICATION NUMBER ▼
C C00502849

Check if ☐ 24-hour report ☐ 48-hour report ☐ New report ☐ Amends report filed on MM / DD / YYYY

Full Name (Last, First, Middle Initial) of Payee
Message & Media

Mailing Address 3101 Lee Highway
Suite 18 #136

City: Bristol State: VA Zip Code: 24202

Date: 03 / 12 / 2012

Amount: 600.00

Transaction ID : SE.4505

Purpose of Expenditure: Email communication

Category/Type: 004

Office Sought: ☒ House ☐ Senate ☐ President State: IL District: 11

Name of Federal Candidate Supported or Opposed by Expenditure:
DONALD A. MANZULLO

Check One: ☐ Support ☒ Oppose

Calendar Year-To-Date Per Election for Office Sought: 600.00

Disbursement For: ☒ Primary ☐ General 2012 ☐ Other (specify) ▶

Full Name (Last, First, Middle Initial) of Payee
Message & Media

Mailing Address 3101 Lee Highway
Suite 18 #136

City: Bristol State: VA Zip Code: 24202

Date: 03 / 13 / 2012

Amount: 600.00

Transaction ID : SE.4526

Purpose of Expenditure: Email communication

Category/Type: 004

Office Sought: ☒ House ☐ Senate ☐ President State: IL District: 13

Name of Federal Candidate Supported or Opposed by Expenditure:
DONALD A. MANZULLO

Check One: ☐ Support ☒ Oppose

Calendar Year-To-Date Per Election for Office Sought: 600.00

Disbursement For: ☒ Primary ☐ General 2012 ☐ Other (specify) ▶

(a) **SUBTOTAL** of Itemized Independent Expenditures ▶ 1200.00

(b) **SUBTOTAL** of Unitemized Independent Expenditures ▶

(c) **TOTAL** Independent Expenditures ▶

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.

Jonathan Martin *[Electronically Filed]*
Signature

Date 04 / 20 / 2012

SCHEDULE E (FEC Form 3X)
ITEMIZED INDEPENDENT EXPENDITURES

NAME OF COMMITTEE (In Full)
CAMPAIGN FOR PRIMARY ACCOUNTABILITY INC

FEC IDENTIFICATION NUMBER ▼
C C00502849

Check if ☐ 24-hour report ☐ 48-hour report ☐ New report ☐ Amends report filed on MM / DD / YYYY

Full Name (Last, First, Middle Initial) of Payee
Message & Media

Date 03 / 16 / 2012

Mailing Address 3101 Lee Highway
Suite 18 #136

Amount 600.00

City: Bristol State: VA Zip Code: 24202

Transaction ID : SE.4540

Purpose of Expenditure: Email communication

Category/Type: 004

Office Sought: ☒ House ☐ Senate ☐ President State: IL District: 16

Name of Federal Candidate Supported or Opposed by Expenditure:
DONALD A. MANZULLO

Check One: ☐ Support ☒ Oppose

Calendar Year-To-Date Per Election for Office Sought 2012: 134131.68

Disbursement For: ☒ Primary ☐ General ☐ Other (specify) ▶

Full Name (Last, First, Middle Initial) of Payee
Message & Media

Date 03 / 19 / 2012

Mailing Address 3101 Lee Highway
Suite 18 #136

Amount 600.00

City: Bristol State: VA Zip Code: 24202

Transaction ID : SE.4647

Purpose of Expenditure: Email communication

Category/Type: 004

Office Sought: ☒ House ☐ Senate ☐ President State: IL District: 16

Name of Federal Candidate Supported or Opposed by Expenditure:
DONALD A. MANZULLO

Check One: ☐ Support ☒ Oppose

Calendar Year-To-Date Per Election for Office Sought 2012: 222731.68

Disbursement For: ☒ Primary ☐ General ☐ Other (specify) ▶

(a) **SUBTOTAL** of Itemized Independent Expenditures ▶ 1200.00

(b) **SUBTOTAL** of Unitemized Independent Expenditures ▶

(c) **TOTAL** Independent Expenditures ▶

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.

Jonathan Martin *[Electronically Filed]*
Signature

Date 04 / 20 / 2012

SCHEDULE E (FEC Form 3X)
ITEMIZED INDEPENDENT EXPENDITURES

NAME OF COMMITTEE (In Full)
CAMPAIGN FOR PRIMARY ACCOUNTABILITY INC

FEC IDENTIFICATION NUMBER ▼
C C00502849

Check if ☐ 24-hour report ☐ 48-hour report ☐ New report ☐ Amends report filed on M M / D D / Y Y Y Y

Full Name (Last, First, Middle Initial) of Payee
Message & Media

Date: 03 / 19 / 2012

Mailing Address 3101 Lee Highway
Suite 18 #136

Amount: 600.00

City: Bristol State: VA Zip Code: 24202

Transaction ID : SE.4649

Purpose of Expenditure: Email communication

Category/Type: 004

Office Sought: ☒ House ☐ Senate ☐ President State: IL District: 16

Name of Federal Candidate Supported or Opposed by Expenditure:
DONALD A. MANZULLO

Check One: ☐ Support ☒ Oppose

Calendar Year-To-Date Per Election for Office Sought: 223331.68

Disbursement For: ☒ Primary ☐ General 2012 ☐ Other (specify) ▶

Full Name (Last, First, Middle Initial) of Payee
The Schuman Group

Date: 03 / 03 / 2012

Mailing Address 7660 Fay Ave.

Amount: 10300.00

City: La Jolla State: CA Zip Code: 92037

Transaction ID : SE.4367

Purpose of Expenditure: Radio Advertisement

Category/Type: 004

Office Sought: ☒ House ☐ Senate ☐ President State: OH District: 02

Name of Federal Candidate Supported or Opposed by Expenditure:
JEANNETTE H SCHMIDT

Check One: ☐ Support ☒ Oppose

Calendar Year-To-Date Per Election for Office Sought: 130180.76

Disbursement For: ☒ Primary ☐ General 2012 ☐ Other (specify) ▶

(a) **SUBTOTAL** of Itemized Independent Expenditures ▶ 10900.00

(b) **SUBTOTAL** of Unitemized Independent Expenditures ▶

(c) **TOTAL** Independent Expenditures ▶

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.

Jonathan Martin *[Electronically Filed]*
Signature

Date 04 / 20 / 2012

SCHEDULE E (FEC Form 3X)
ITEMIZED INDEPENDENT EXPENDITURES

NAME OF COMMITTEE (In Full)
CAMPAIGN FOR PRIMARY ACCOUNTABILITY INC

FEC IDENTIFICATION NUMBER ▼
C C00502849

Check if ☐ 24-hour report ☐ 48-hour report ☐ New report ☐ Amends report filed on M M / D D / Y Y Y Y

Full Name (Last, First, Middle Initial) of Payee
The Schuman Group

Date: 03 / 03 / 2012

Mailing Address 7660 Fay Ave.

Amount: 25000.00

City: La Jolla State: CA Zip Code: 92037

Transaction ID : SE.4370

Purpose of Expenditure
Television Advertisement

Category/Type: 004

Office Sought: ☒ House ☐ Senate ☐ President State: AL District: 06

Name of Federal Candidate Supported or Opposed by Expenditure:
SPENCER T. BACHUS

Check One: ☐ Support ☒ Oppose

Calendar Year-To-Date Per Election for Office Sought: 50000.00

Disbursement For: ☒ Primary ☐ General 2012 ☐ Other (specify) ▶

Full Name (Last, First, Middle Initial) of Payee
The Schuman Group

Date: 03 / 05 / 2012

Mailing Address 7660 Fay Ave.

Amount: 1843.38

City: La Jolla State: CA Zip Code: 92037

Transaction ID : SE.4376

Purpose of Expenditure
Automated Calls

Category/Type: 004

Office Sought: ☒ House ☐ Senate ☐ President State: OH District: 02

Name of Federal Candidate Supported or Opposed by Expenditure:
JEANNETTE H SCHMIDT

Check One: ☐ Support ☒ Oppose

Calendar Year-To-Date Per Election for Office Sought: 132024.14

Disbursement For: ☒ Primary ☐ General 2012 ☐ Other (specify) ▶

(a) **SUBTOTAL** of Itemized Independent Expenditures ▶ 26843.38

(b) **SUBTOTAL** of Unitemized Independent Expenditures ▶

(c) **TOTAL** Independent Expenditures ▶

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.

Jonathan Martin *[Electronically Filed]*
Signature

Date 04 / 20 / 2012

SCHEDULE E (FEC Form 3X)
ITEMIZED INDEPENDENT EXPENDITURES

NAME OF COMMITTEE (In Full)
CAMPAIGN FOR PRIMARY ACCOUNTABILITY INC

FEC IDENTIFICATION NUMBER ▼
C C00502849

Check if ☐ 24-hour report ☐ 48-hour report ☐ New report ☐ Amends report filed on M M / D D / Y Y Y Y

Full Name (Last, First, Middle Initial) of Payee
The Schuman Group

Mailing Address 7660 Fay Ave.

City La Jolla State CA Zip Code 92037

Date 03 / 05 / 2012

Amount 2971.50

Transaction ID : SE.4379

Purpose of Expenditure
Automated Calls

Category/Type 004

Office Sought: ☒ House ☐ Senate ☐ President State: AL District: 06

Name of Federal Candidate Supported or Opposed by Expenditure:
SPENCER T. BACHUS

Check One: ☐ Support ☒ Oppose

Calendar Year-To-Date Per Election for Office Sought 52971.50

Disbursement For: ☒ Primary ☐ General
2012 ☐ Other (specify) ▶

Full Name (Last, First, Middle Initial) of Payee
The Schuman Group

Mailing Address 7660 Fay Ave.

City La Jolla State CA Zip Code 92037

Date 03 / 09 / 2012

Amount 2500.00

Transaction ID : SE.4452

Purpose of Expenditure
Email communication

Category/Type 004

Office Sought: ☒ House ☐ Senate ☐ President State: AL District: 06

Name of Federal Candidate Supported or Opposed by Expenditure:
SPENCER T. BACHUS

Check One: ☐ Support ☒ Oppose

Calendar Year-To-Date Per Election for Office Sought 187904.30

Disbursement For: ☒ Primary ☐ General
2012 ☐ Other (specify) ▶

(a) **SUBTOTAL** of Itemized Independent Expenditures ▶ 5471.50

(b) **SUBTOTAL** of Unitemized Independent Expenditures ▶

(c) **TOTAL** Independent Expenditures ▶

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.

Jonathan Martin *[Electronically Filed]*
Signature

Date 04 / 20 / 2012

SCHEDULE E (FEC Form 3X)
ITEMIZED INDEPENDENT EXPENDITURES

NAME OF COMMITTEE (In Full)
CAMPAIGN FOR PRIMARY ACCOUNTABILITY INC

FEC IDENTIFICATION NUMBER ▼
C C00502849

Check if ☐ 24-hour report ☐ 48-hour report ☐ New report ☐ Amends report filed on MM / DD / YYYY

Full Name (Last, First, Middle Initial) of Payee
The Schuman Group

Date: 03 / 10 / 2012

Mailing Address 7660 Fay Ave.

Amount: 2500.00

City: La Jolla State: CA Zip Code: 92037

Transaction ID : SE.4454

Purpose of Expenditure: Email communication

Category/Type: 003

Office Sought: ☒ House ☐ Senate ☐ President State: AL District: 06

Name of Federal Candidate Supported or Opposed by Expenditure:
SPENCER T. BACHUS

Check One: ☐ Support ☒ Oppose

Calendar Year-To-Date Per Election for Office Sought: 190404.30

Disbursement For: ☒ Primary ☐ General 2012 ☐ Other (specify) ▶

Full Name (Last, First, Middle Initial) of Payee
Thomas Graphics, Inc.

Date: 03 / 01 / 2012

Mailing Address P.O. Box 142226

Amount: 20950.00

City: Austin State: TX Zip Code: 78714-2226

Transaction ID : SE.4343

Purpose of Expenditure: Radio Advertisement

Category/Type: 004

Office Sought: ☒ House ☐ Senate ☐ President State: OH District: 02

Name of Federal Candidate Supported or Opposed by Expenditure:
JEANNETTE H SCHMIDT

Check One: ☐ Support ☒ Oppose

Calendar Year-To-Date Per Election for Office Sought: 119880.76

Disbursement For: ☒ Primary ☐ General 2012 ☐ Other (specify) ▶

(a) **SUBTOTAL** of Itemized Independent Expenditures ▶ 23450.00

(b) **SUBTOTAL** of Unitemized Independent Expenditures ▶

(c) **TOTAL** Independent Expenditures ▶

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.

Jonathan Martin *[Electronically Filed]*
Signature

Date 04 / 20 / 2012

SCHEDULE E (FEC Form 3X)
ITEMIZED INDEPENDENT EXPENDITURES

NAME OF COMMITTEE (In Full)
CAMPAIGN FOR PRIMARY ACCOUNTABILITY INC

FEC IDENTIFICATION NUMBER ▼
C C00502849

Check if ☐ 24-hour report ☐ 48-hour report ☐ New report ☐ Amends report filed on M M / D D / Y Y Y Y

Full Name (Last, First, Middle Initial) of Payee
Thomas Graphics, Inc.

Date: 03 / 01 / 2012

Mailing Address P.O. Box 142226

Amount: 25000.00

City: Austin State: TX Zip Code: 78714-2226

Transaction ID : SE.4347

Purpose of Expenditure
Television Advertisement

Category/Type: 004

Office Sought: ☒ House ☐ Senate ☐ President State: AL District: 06

Name of Federal Candidate Supported or Opposed by Expenditure:
SPENCER T. BACHUS

Check One: ☐ Support ☒ Oppose

Calendar Year-To-Date Per Election for Office Sought 2012: 25000.00

Disbursement For: ☒ Primary ☐ General ☐ Other (specify) ▶

Full Name (Last, First, Middle Initial) of Payee
Thomas Graphics, Inc.

Date: 03 / 07 / 2012

Mailing Address P.O. Box 142226

Amount: 10530.00

City: Austin State: TX Zip Code: 78714-2226

Transaction ID : SE.4404

Purpose of Expenditure
Television Advertisement

Category/Type: 004

Office Sought: ☒ House ☐ Senate ☐ President State: AL District: 06

Name of Federal Candidate Supported or Opposed by Expenditure:
SPENCER T. BACHUS

Check One: ☐ Support ☒ Oppose

Calendar Year-To-Date Per Election for Office Sought 2012: 64701.50

Disbursement For: ☒ Primary ☐ General ☐ Other (specify) ▶

(a) **SUBTOTAL** of Itemized Independent Expenditures ▶ 35530.00

(b) **SUBTOTAL** of Unitemized Independent Expenditures ▶

(c) **TOTAL** Independent Expenditures ▶

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.

Jonathan Martin *[Electronically Filed]*
Signature

Date 04 / 20 / 2012

SCHEDULE E (FEC Form 3X)
ITEMIZED INDEPENDENT EXPENDITURES

NAME OF COMMITTEE (In Full)
CAMPAIGN FOR PRIMARY ACCOUNTABILITY INC

FEC IDENTIFICATION NUMBER ▼
C C00502849

Check if ☐ 24-hour report ☐ 48-hour report ☐ New report ☐ Amends report filed on MM / DD / YYYY

Full Name (Last, First, Middle Initial) of Payee
Thomas Graphics, Inc.

Date 03 / 07 / 2012

Mailing Address P.O. Box 142226

Amount 27171.31

City Austin State TX Zip Code 78714-2226

Transaction ID : SE.4413

Purpose of Expenditure
Mailer

Category/ Type 006

Office Sought: ☒ House ☐ Senate ☐ President State: AL District: 01

Name of Federal Candidate Supported or Opposed by Expenditure:
JO BONNER

Check One: ☐ Support ☒ Oppose

Calendar Year-To-Date Per Election for Office Sought 49170.05

Disbursement For: ☒ Primary ☐ General 2012 ☐ Other (specify) ▶

Full Name (Last, First, Middle Initial) of Payee
Thomas Graphics, Inc.

Date 03 / 07 / 2012

Mailing Address P.O. Box 142226

Amount 21171.31

City Austin State TX Zip Code 78714-2226

Transaction ID : SE.4415

Purpose of Expenditure
Mailer

Category/ Type 004

Office Sought: ☒ House ☐ Senate ☐ President State: AL District: 01

Name of Federal Candidate Supported or Opposed by Expenditure:
JO BONNER

Check One: ☐ Support ☒ Oppose

Calendar Year-To-Date Per Election for Office Sought 70341.36

Disbursement For: ☒ Primary ☐ General 2012 ☐ Other (specify) ▶

(a) **SUBTOTAL** of Itemized Independent Expenditures ▶ 48342.62

(b) **SUBTOTAL** of Unitemized Independent Expenditures ▶

(c) **TOTAL** Independent Expenditures ▶

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.

Jonathan Martin *[Electronically Filed]*
Signature

Date 04 / 20 / 2012

SCHEDULE E (FEC Form 3X)
ITEMIZED INDEPENDENT EXPENDITURES

NAME OF COMMITTEE (In Full)
CAMPAIGN FOR PRIMARY ACCOUNTABILITY INC

FEC IDENTIFICATION NUMBER ▼
C C00502849

Check if ☐ 24-hour report ☐ 48-hour report ☐ New report ☐ Amends report filed on MM / DD / YYYY

Full Name (Last, First, Middle Initial) of Payee
Thomas Graphics, Inc.

Date 03 / 07 / 2012

Mailing Address P.O. Box 142226

Amount 20824.35

City Austin State TX Zip Code 78714-2226

Transaction ID : SE.4417

Purpose of Expenditure
Mailer

Category/Type 004

Office Sought: ☒ House ☐ Senate ☐ President State: AL District: 06

Name of Federal Candidate Supported or Opposed by Expenditure:
SPENCER T. BACHUS

Check One: ☐ Support ☒ Oppose

Calendar Year-To-Date Per Election for Office Sought 134995.85

Disbursement For: ☒ Primary ☐ General
2012 ☐ Other (specify) ▶

Full Name (Last, First, Middle Initial) of Payee
Thomas Graphics, Inc.

Date 03 / 07 / 2012

Mailing Address P.O. Box 142226

Amount 20499.60

City Austin State TX Zip Code 78714-2226

Transaction ID : SE.4419

Purpose of Expenditure
Mailer

Category/Type 004

Office Sought: ☒ House ☐ Senate ☐ President State: AL District: 06

Name of Federal Candidate Supported or Opposed by Expenditure:
SPENCER T. BACHUS

Check One: ☐ Support ☒ Oppose

Calendar Year-To-Date Per Election for Office Sought 155495.45

Disbursement For: ☒ Primary ☐ General
2012 ☐ Other (specify) ▶

(a) **SUBTOTAL** of Itemized Independent Expenditures ▶ 41323.95

(b) **SUBTOTAL** of Unitemized Independent Expenditures ▶

(c) **TOTAL** Independent Expenditures ▶

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Jonathan Martin *[Electronically Filed]*
Signature

Date 04 / 20 / 2012

SCHEDULE E (FEC Form 3X)
ITEMIZED INDEPENDENT EXPENDITURES

NAME OF COMMITTEE (In Full)
CAMPAIGN FOR PRIMARY ACCOUNTABILITY INC

FEC IDENTIFICATION NUMBER ▼
C C00502849

Check if ☐ 24-hour report ☐ 48-hour report ☐ New report ☐ Amends report filed on MM / DD / YYYY

Full Name (Last, First, Middle Initial) of Payee
Thomas Graphics, Inc.

Date 03 / 08 / 2012

Mailing Address P.O. Box 142226

Amount 25655.81

City Austin State TX Zip Code 78714-2226

Transaction ID : SE.4429

Purpose of Expenditure
Direct Mail Piece

Category/Type 004

Office Sought: ☒ House ☐ Senate ☐ President State: AL District: 01

Name of Federal Candidate Supported or Opposed by Expenditure:
JO BONNER

Check One: ☐ Support ☒ Oppose

Calendar Year-To-Date Per Election for Office Sought 115997.17

Disbursement For: ☒ Primary ☐ General 2012 ☐ Other (specify) ▶

Full Name (Last, First, Middle Initial) of Payee
Thomas Graphics, Inc.

Date 03 / 08 / 2012

Mailing Address P.O. Box 142226

Amount 19308.85

City Austin State TX Zip Code 78714-2226

Transaction ID : SE.4432

Purpose of Expenditure
Direct Mail Piece

Category/Type 004

Office Sought: ☒ House ☐ Senate ☐ President State: AL District: 06

Name of Federal Candidate Supported or Opposed by Expenditure:
SPENCER T. BACHUS

Check One: ☐ Support ☒ Oppose

Calendar Year-To-Date Per Election for Office Sought 174804.30

Disbursement For: ☒ Primary ☐ General 2012 ☐ Other (specify) ▶

(a) **SUBTOTAL** of Itemized Independent Expenditures ▶ 44964.66

(b) **SUBTOTAL** of Unitemized Independent Expenditures ▶

(c) **TOTAL** Independent Expenditures ▶

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.

Jonathan Martin *[Electronically Filed]*
Signature

Date 04 / 20 / 2012

SCHEDULE E (FEC Form 3X)
ITEMIZED INDEPENDENT EXPENDITURES

NAME OF COMMITTEE (In Full)
CAMPAIGN FOR PRIMARY ACCOUNTABILITY INC

FEC IDENTIFICATION NUMBER ▼
C C00502849

Check if ☐ 24-hour report ☐ 48-hour report ☐ New report ☐ Amends report filed on MM / DD / YYYY

Full Name (Last, First, Middle Initial) of Payee
Thomas Graphics, Inc.

Mailing Address P.O. Box 142226

City Austin State TX Zip Code 78714-2226

Date 03 / 08 / 2012

Amount 18271.93

Transaction ID : SE.4435

Purpose of Expenditure
Direct Mail Piece

Category/Type 006

Office Sought: ☒ House ☐ Senate ☐ President State: IL District: 16

Name of Federal Candidate Supported or Opposed by Expenditure:
DONALD A. MANZULLO

Check One: ☐ Support ☒ Oppose

Calendar Year-To-Date Per Election for Office Sought 18871.93

Disbursement For: ☒ Primary ☐ General 2012 ☐ Other (specify) ▶

Full Name (Last, First, Middle Initial) of Payee
Thomas Graphics, Inc.

Mailing Address P.O. Box 142226

City Austin State TX Zip Code 78714-2226

Date 03 / 12 / 2012

Amount 24018.39

Transaction ID : SE.4508

Purpose of Expenditure
Direct mail piece

Category/Type 006

Office Sought: ☒ House ☐ Senate ☐ President State: IL District: 16

Name of Federal Candidate Supported or Opposed by Expenditure:
DONALD A. MANZULLO

Check One: ☐ Support ☒ Oppose

Calendar Year-To-Date Per Election for Office Sought 52890.32

Disbursement For: ☒ Primary ☐ General 2012 ☐ Other (specify) ▶

(a) **SUBTOTAL** of Itemized Independent Expenditures ▶ 42290.32

(b) **SUBTOTAL** of Unitemized Independent Expenditures ▶

(c) **TOTAL** Independent Expenditures ▶

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.

Jonathan Martin *[Electronically Filed]*
Signature

Date 04 / 20 / 2012

SCHEDULE E (FEC Form 3X)
ITEMIZED INDEPENDENT EXPENDITURES

NAME OF COMMITTEE (In Full)
CAMPAIGN FOR PRIMARY ACCOUNTABILITY INC

FEC IDENTIFICATION NUMBER ▼
C C00502849

Check if ☐ 24-hour report ☐ 48-hour report ☐ New report ☐ Amends report filed on MM / DD / YYYY

Full Name (Last, First, Middle Initial) of Payee
Thomas Graphics, Inc.

Date: 03 / 13 / 2012

Mailing Address P.O. Box 142226

Amount: 26952.62

City: Austin State: TX Zip Code: 78714-2226

Transaction ID : SE.4519

Purpose of Expenditure: Post card mailer

Category/Type: 006

Office Sought: ☒ House ☐ Senate ☐ President State: IL District: 16

Name of Federal Candidate Supported or Opposed by Expenditure:
DONALD A. MANZULLO

Check One: ☐ Support ☒ Oppose

Calendar Year-To-Date Per Election for Office Sought: 79842.94

Disbursement For: ☒ Primary ☐ General 2012 ☐ Other (specify) ▶

Full Name (Last, First, Middle Initial) of Payee
Thomas Graphics, Inc.

Date: 03 / 14 / 2012

Mailing Address P.O. Box 142226

Amount: 26844.37

City: Austin State: TX Zip Code: 78714-2226

Transaction ID : SE.4529

Purpose of Expenditure: Postcard mailer

Category/Type: 006

Office Sought: ☒ House ☐ Senate ☐ President State: IL District: 16

Name of Federal Candidate Supported or Opposed by Expenditure:
DONALD A. MANZULLO

Check One: ☐ Support ☒ Oppose

Calendar Year-To-Date Per Election for Office Sought: 106687.31

Disbursement For: ☒ Primary ☐ General 2012 ☐ Other (specify) ▶

(a) **SUBTOTAL** of Itemized Independent Expenditures ▶ 53796.99

(b) **SUBTOTAL** of Unitemized Independent Expenditures ▶

(c) **TOTAL** Independent Expenditures ▶

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.

Jonathan Martin *[Electronically Filed]*
Signature

Date 04 / 20 / 2012

SCHEDULE E (FEC Form 3X)
ITEMIZED INDEPENDENT EXPENDITURES

NAME OF COMMITTEE (In Full)
CAMPAIGN FOR PRIMARY ACCOUNTABILITY INC

FEC IDENTIFICATION NUMBER ▼
C C00502849

Check if ☐ 24-hour report ☐ 48-hour report ☐ New report ☐ Amends report filed on MM / DD / YYYY

Full Name (Last, First, Middle Initial) of Payee
Thomas Graphics, Inc.

Date: 03 / 15 / 2012

Mailing Address P.O. Box 142226

Amount: 26844.37

City: Austin State: TX Zip Code: 78714-2226

Transaction ID : SE.4532

Purpose of Expenditure: Postcard mailer

Category/Type: 006

Office Sought: ☒ House ☐ Senate ☐ President State: IL District: 16

Name of Federal Candidate Supported or Opposed by Expenditure:
DONALD A. MANZULLO

Check One: ☐ Support ☒ Oppose

Calendar Year-To-Date Per Election for Office Sought: 133531.68

Disbursement For: ☒ Primary ☐ General 2012 ☐ Other (specify) ▶

Full Name (Last, First, Middle Initial) of Payee
TV Alabama, Inc.

Date: 03 / 07 / 2012

Mailing Address 800 Concourse Parkway
Suite 200

Amount: 21590.00

City: Birmingham State: AL Zip Code: 35244

Transaction ID : SE.4411

Purpose of Expenditure: Television advertisement

Category/Type: 004

Office Sought: ☒ House ☐ Senate ☐ President State: AL District: 06

Name of Federal Candidate Supported or Opposed by Expenditure:
SPENCER T. BACHUS

Check One: ☐ Support ☒ Oppose

Calendar Year-To-Date Per Election for Office Sought: 114171.50

Disbursement For: ☒ Primary ☐ General 2012 ☐ Other (specify) ▶

(a) **SUBTOTAL** of Itemized Independent Expenditures ▶ 48434.37

(b) **SUBTOTAL** of Unitemized Independent Expenditures ▶

(c) **TOTAL** Independent Expenditures ▶

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.

Jonathan Martin *[Electronically Filed]*
Signature

Date 04 / 20 / 2012

SCHEDULE E (FEC Form 3X)
ITEMIZED INDEPENDENT EXPENDITURES

FOR LINE 24 OF FORM 3X

NAME OF COMMITTEE (In Full)
CAMPAIGN FOR PRIMARY ACCOUNTABILITY INC

FEC IDENTIFICATION NUMBER ▼
C C00502849

Check if ☐ 24-hour report ☐ 48-hour report ☐ New report ☐ Amends report filed on MM / DD / YYYY

Full Name (Last, First, Middle Initial) of Payee
WBRC

Date 03 / 07 / 2012

Mailing Address 1720 Valley View Drive

Amount 27880.00

City Birmingham State AL Zip Code 35209

Transaction ID : SE.4409

Purpose of Expenditure
Television advertisement

Category/Type 004

Office Sought: ☒ House ☐ Senate ☐ President State: AL District: 06

Name of Federal Candidate Supported or Opposed by Expenditure:
SPENCER T. BACHUS

Check One: ☐ Support ☒ Oppose

Calendar Year-To-Date Per Election for Office Sought 92581.50

Disbursement For: ☒ Primary ☐ General
2012 ☐ Other (specify) ▶

Full Name (Last, First, Middle Initial) of Payee

Date MM / DD / YYYY

Mailing Address

Amount

City State Zip Code

Purpose of Expenditure

Category/Type

Office Sought: ☐ House ☐ Senate ☐ President State: District:

Name of Federal Candidate Supported or Opposed by Expenditure:

Check One: ☐ Support ☐ Oppose

Calendar Year-To-Date Per Election for Office Sought

Disbursement For: ☐ Primary ☐ General
☐ Other (specify) ▶

(a) **SUBTOTAL** of Itemized Independent Expenditures ▶ 27880.00

(b) **SUBTOTAL** of Unitemized Independent Expenditures ▶

(c) **TOTAL** Independent Expenditures ▶ 673163.66

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.

Jonathan Martin *[Electronically Filed]*
Signature

Date 04 / 20 / 2012

EXHIBIT 8

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

OFFICE OF CONGRESSIONAL ETHICS
UNITED STATES HOUSE OF REPRESENTATIVES

MEMORANDUM OF INTERVIEW

IN RE:	Representative 1
REVIEW NO.:	12-9525
DATE:	July 20, 2012
LOCATION:	1776 K Street Washington, DC 20006
TIME:	2:35 p.m. to 2:46 p.m. (approximately)
PARTICIPANTS:	Omar S. Ashmawy Kedric L. Payne Jan W. Baran Robert L. Walker

SUMMARY: Representative 1 is a Member of the United States of House of Representatives. The OCE requested an interview with Representative 1 on July 12, 2012, and he consented to an interview. Representative 1 (the "witness") made the following statements in response to our questioning:

1. The witness was given an 18 U.S.C. § 1001 warning and consented to an interview.
2. He refused to sign a written acknowledgement of the warning that his statements are subject to the False Statements Act.
3. The witness stated that he is affiliated with ERIC PAC, which he believes was established in 2003 or 2004.
4. He told the OCE that ERIC PAC does not have an official decision making policy with respect to determining how it contributes to other political committees.
5. When the witness decides that ERIC PAC should make a contribution, he usually speaks with Bill Dolbow and Ray Allen.
6. The witness does not know how many individuals affiliated with ERIC PAC have the authority to make contributions from the committee's account, however, he has final authority on contributions.
7. He told the OCE that he became familiar with the Campaign for Primary Accountability ("CPA") without knowing the name of the entity. This happened when he received a call from Representative Aaron Schock approximately one week before the primary election of Representative Adam Kinzinger in Illinois.

8. Representative Schock called the witness and asked whether he would give $25,000 to a super PAC operating in Illinois in connection with Representative Kinzinger's race.

9. In response to Representative Schock's request, the witness told him that he would give $25,000 to the committee.

10. The witness recalled that he put Representative Schock in contact with Rob Collins. The witness described Mr. Collins as a political mind that he thought would be able to assist Representative Schock in raising funds for the committee that was CPA.

11. On or about March 15, 2012, the witness stated that he received a call from Ray Allen and Mr. Allen asked whether the witness wanted to give $25,000 to CPA. The witness asked Mr. Allen whether it was legal to make such a contribution and Mr. Allen told him yes.

12. The witness did not have any further conversations about the contribution with Mr. Allen at that time in March 2012.

13. The witness stated that he did not know Rodney Davis until after March 2012.

This memorandum was prepared on August 1, 2012, based on the notes that the OCE staff prepared during the interview with the witness on July 20, 2012. I certify that this memorandum contains all pertinent matter discussed with the witness on July 20, 2012.

Kedric L. Payne
Deputy Chief Counsel

EXHIBIT 9

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

OFFICE OF CONGRESSIONAL ETHICS
UNITED STATES HOUSE OF REPRESENTATIVES

MEMORANDUM OF INTERVIEW

IN RE:	Representative Aaron Schock
REVIEW NO.:	12-9525
DATE:	July 26, 2012
LOCATION:	328 Cannon HOB Washington, DC 20515
TIME:	9:40 a.m. to 10:30 a.m. (approximately)
PARTICIPANTS:	Kedric L. Payne Omar S. Ashmawy Robert K. Kelner Derek Lawlor

SUMMARY: Representative Aaron Schock is a Member of the United States House of Representatives and represents the 18th District of Illinois. The OCE requested an interview with Representative Schock on July 26, 2012, and he consented to an interview. Representative Schock (the "witness") made the following statements in response to our questioning:

1. The witness was given an 18 U.S.C. § 1001 warning and consented to an interview.

2. He refused to sign a written acknowledgement of the warning that his statements are subject to the False Statements Act.

3. He first learned of the Campaign for Primary Accountability ("CPA") through press accounts of CPA's activity in Representative Jean Schmidt's 2012 primary election in Ohio.

4. The witness stated that he contacted Ron Gidwitz to see if CPA was going to become involved in the primary election of Representative Adam Kinzinger. The witness knew that CPA was started by the Ricketts family. He did not know the family, but Mr. Gitwidz did, so the witness asked Mr. Gidwitz to reach out to them.

5. The witness told the OCE that he does not recall communicating with anyone who he believed to be an employee of CPA. He recalled that he may have contacted CPA after the Representative Kinzinger race when there were questions about whether the money raised by Illinois donors was used for the Representative Kinzinger race.

6. He believes that he may have contacted Jamie Story of CPA, but he is not certain. He stated that he did not believe that he communicated with Leo Linbeck, Eric O'Keefe, or

Hannah Christian. He did not think he was asked by these individuals or anyone else affiliated with CPA for any campaign contributions.

7. The witness has known Rodney Davis for eight to ten years. He communicated last with Mr. Davis approximately two weeks prior to this interview at a fundraiser the witness hosted for Mr. Davis. The witness told the OCE that he has not discussed this OCE review with Rodney Davis.

8. The witness knew that during the time period around March 2012, Mr. Davis helped various political campaigns. The witness stated that he does not remember Mr. Davis asking him to contribute to CPA, but that he was sure they had a conversation about it as Mr. Davis was a very active political person in Illinois. That conversation may have been in the context of what CPA was doing in the campaigns that Mr. Davis and the witness cared about.

9. However, Mr. Davis was working for Representative Shimkus at the time and so Mr. Davis communicated more with the witness's staff than with the witness. When asked with which staff Mr. Davis would have communicated, the witness stated that it depended on the topic.

10. The witness did not remember Mr. Davis asking him to contribute to CPA. The witness did not remember if Mr. Davis asked any of the witness's staff to contribute to CPA.

11. The witness only became aware of the extent of Mr. Davis' involvement with CPA as a result of the OCE investigation. At the time in March 2012, he was not aware of Mr. Davis raising money for CPA.

12. The witness does not remember having any discussions with Representative John Shimkus concerning CPA.

13. The witness told the OCE that he is familiar with the 18th District Republican Central Committee. He described the organization as three entities. The 18th District Republican Central Committee is "the political arm of my congressional district." It is a political organization with two fundraising committees – a state and federal committee. It also has a board of directors. The witness has no role with the board, nor does he have any role with the state fundraising committee.

14. The federal account of the 18th District Republican Central Committee fundraises for federal campaigns. The witness stated that he assisted with establishing this federal account when he was first elected to Congress. The witness is involved in fundraising for this committee with his joint fundraising committee.

15. The witness stated that he has never requested that the 18th District Republican Central Committee contribute to any political campaigns.

16. Mike Bigger is his primary contact with the 18th District Republican Central Committee. The witness stated that no one affiliated with the federal account of the 18th District Republican Central Committee has ever asked him to contribute to any political campaigns.

17. When asked whether the Schock for Congress Campaign Director, Tania Hoerr, has any role with the 18th District Republican Central Committee, the witness stated that she is responsible for disbursements to the committee from the witness' joint fundraising committee, Schock Victory Fund.

18. The witness told the OCE that he was not aware if she was involved in any contributions that the 18th District Republican Central Committee makes.

19. He stated that he learned that approximately ten days before Representative Kinzinger's primary election in March 2012 that the 18th District Republican Central Committee contributed to CPA.

20. Mr. Bigger told him about the contribution.

21. The witness told the OCE that he called Representative Eric Cantor to provide an update on the Representative Kinzinger race because he knew that Representative Cantor supported Representative Kinzinger. This was after he learned that people were contributing to CPA. Specifically, Mr. Bigger had told the witness that he had made a $25,000 contribution.

22. During the conversation the witness told Representative Cantor that the race was close. He also made Representative Cantor aware of CPA's involvement and of "my support" and asked Representative Cantor for his support.

23. The witness stated that he does not remember exactly what he told Representative Cantor, but he believes he said that "We're doing $25,000 would you be able to do $25,000."

24. "We're doing $25,000" referred to the 18th District Republican Central Committee's contribution of $25,000 to CPA. He referred to it as "we" because it was a donation being made within his district.

25. The witness told the OCE that when he asked whether Representative Cantor would "consider doing $25,000" it was "DC speak" for asking would Representative Cantor "come up" with $25,000. The witness did not discuss with Representative Cantor the various ways of coming up with $25,000. When the conversation is Member to Member,

"we don't discuss how" – whether you write a check from your campaign or get your donors to do it or some other way.

26. When asked for examples of how a person may "come up" with a contribution, the witness explained various methods of "coming up" with money to contribute to party committees. According to the witness, a Member may: contribute an unlimited amount from their campaign committee; solicit any citizen to contribute; contribute from a leadership PAC; or contribute from another political committee.

27. As a further example, the witness explained that if the Speaker of the House told the witness that he owed $250,000 in dues to the National Republican Congressional Committee, the witness could get the money from his district, his account, or another place.

28. The witness stated that he also contacted David Herro in March 2012 about contributing to CPA. He has known Mr. Herro for approximately five years and he knew that Mr. Herro supported Representative Kizinger.

29. The witness contacted Mr. Herro and told him that Representative Kinzinger's race was close. The witness asked if Mr. Herro could help.

30. Mr. Herro agreed to help. The witness stated that he did not remember asking Mr. Herro for any amount to contribute to CPA. The witness does not remember telling Mr. Herro about the $25,000 contribution from the 18th District Republican Central Committee to CPA.

31. Mr. Herro told the witness that he would help that he would attempt to have others to help.

32. The witness knows Ms. Anne Dias Griffin. He did not discuss CPA with Ms. Griffin and did not ask her to contribute.

33. The witness told the OCE that he reviewed the Request for Information and did not withhold any information in his production to the OCE. He stated that his response was complete to the best of his knowledge.

This memorandum was prepared on July 31, 2012, based on the notes that the OCE staff prepared during the interview with the witness on July 26, 2012. I certify that this memorandum contains all pertinent matter discussed with the witness on July 31, 2012.

Kedric L. Payne
Deputy Chief Counsel

EXHIBIT 10

FEC FORM 1

STATEMENT OF ORGANIZATION

Office Use Only

1. NAME OF COMMITTEE (in full) ☐ (Check if name is changed) Example:If typing, type over the lines. 12FE4M5

18th District Republican Central Commiittee (Federal Account)

ADDRESS (number and street) PO Box 10362

☐ (Check if address is changed)

Peoria | IL | 61612 -

CITY | STATE | ZIP CODE

COMMITTEE'S E-MAIL ADDRESS (Please provide only one e-mail address)

[redacted]@pdscompliance.com

☐ (Check if address is changed)

COMMITTEE'S WEB PAGE ADDRESS (URL)

☐ (Check if address is changed)

2. DATE M M 02 / D D 03 / Y Y Y Y 2011

3. FEC IDENTIFICATION NUMBER C C00493460

4. IS THIS STATEMENT ☐ NEW (N) **OR** ☒ AMENDED (A)

I certify that I have examined this Statement and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer Paul Kilgore

Signature of Treasurer *Paul Kilgore* ***[Electronically Filed]*** Date M M 02 / D D 06 / Y Y Y Y 2012

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. §437g.

ANY CHANGE IN INFORMATION SHOULD BE REPORTED WITHIN 10 DAYS.

Office Use Only				

For further information contact:
Federal Election Commission
Toll Free 800-424-9530
Local 202-694-1100

FEC FORM 1
(Revised 02/2009)

5. TYPE OF COMMITTEE

Candidate Committee:

(a) ☐ This committee is a principal campaign committee. (Complete the candidate information below.)

(b) ☐ This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)

Name of Candidate

Candidate Party Affiliation

Office Sought: ☐ House ☐ Senate ☐ President

State

District

(c) ☐ This committee supports/opposes only one candidate, and is NOT an authorized committee.

Name of Candidate

Party Committee:

(d) ☒ This committee is a SUB (National, State or subordinate) committee of the REP (Democratic, Republican, etc.) Party.

Political Action Committee (PAC):

(e) ☐ This committee is a separate segregated fund. (Identify connected organization on line 6.) Its connected organization is a:

☐ Corporation ☐ Corporation w/o Capital Stock ☐ Labor Organization

☐ Membership Organization ☐ Trade Association ☐ Cooperative

☐ In addition, this committee is a Lobbyist/Registrant PAC.

(f) ☐ This committee supports/opposes more than one Federal candidate, and is NOT a separate segregated fund or party committee. (i.e., nonconnected committee)

☐ In addition, this committee is a Lobbyist/Registrant PAC.

☐ In addition, this committee is a Leadership PAC. (Identify sponsor on line 6.)

Joint Fundraising Representative:

(g) ☐ This committee collects contributions, pays fundraising expenses and disburses net proceeds for two or more political committees/organizations, at least one of which is an authorized committee of a federal candidate.

(h) ☐ This committee collects contributions, pays fundraising expenses and disburses net proceeds for two or more political committees/organizations, none of which is an authorized committee of a federal candidate.

Committees Participating in Joint Fundraiser

1. FEC ID number C

2. FEC ID number C

3. FEC ID number C

4. FEC ID number C

Write or Type Committee Name

18th District Republican Central Commiittee (Federal Account)

6. Name of Any Connected Organization, Affiliated Committee, Joint Fundraising Representative, or Leadership PAC Sponsor

Illinois Republican Party

Mailing Address: P.O. Box 64897

Chicago (CITY) IL (STATE) 60664 (ZIP CODE)

Relationship: ☐ Connected Organization ☒ Affiliated Committee ☐ Joint Fundraising Representative ☐ Leadership PAC Sponsor

7. **Custodian of Records:** Identify by name, address (phone number -- optional) and position of the person in possession of committee books and records.

Full Name

Mailing Address

CITY STATE ZIP CODE

Title or Position

Telephone number

8. **Treasurer:** List the name and address (phone number -- optional) of the treasurer of the committee; and the name and address of any designated agent (e.g., assistant treasurer).

Full Name of Treasurer: Paul Kilgore

Mailing Address: 2470 Daniell's Bridge Rd Ste 121

Athens (CITY) GA (STATE) 30606 (ZIP CODE)

Title or Position: Treasurer

Telephone number: 706 - 534 - [redacted]

Full Name of Designated Agent

Mailing Address

CITY STATE ZIP CODE

Title or Position

Telephone number

9. **Banks or Other Depositories:** List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of Bank, Depository, etc.

CEFCU

Mailing Address

PO Box 1715

Peoria IL 61656

CITY STATE ZIP CODE

Name of Bank, Depository, etc.

Mailing Address

CITY STATE ZIP CODE

FORM 1S -STATEMENT OF ORGANIZATION (Supplemental Page)

Banks or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

[ADDITIONAL]

Name of Bank, Depository, etc.

Mailing Address

CITY STATE ZIP CODE

[ADDITIONAL]

Name of Any Connected Organization, Affiliated Committee, Joint Fundraising Representative, or Leadership PAC Sponsor

Schock Victory Committee

Mailing Address 2470 Daniell's Bridge Rd Ste 121

Athens GA 30606

CITY STATE ZIP CODE

Relationship:

- [ ] Connected Organization
- [ ] Affiliated Committee
- [x] Joint Fundraising Representative
- [ ] Leadership PAC Sponsor

[ADDITIONAL]

Designated Agent

Full Name

Mailing Address

Title or Position CITY STATE ZIP CODE

Telephone number

[ADDITIONAL]

Joint Fundraiser Participant

FEC ID number C

EXHIBIT 11

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

OFFICE OF CONGRESSIONAL ETHICS
UNITED STATES HOUSE OF REPRESENTATIVES

MEMORANDUM OF INTERVIEW

IN RE:	Representative Schock's Campaign Director
REVIEW NO.:	12-9525
DATE:	July 26, 2012
LOCATION:	1201 Pennsylvania Avenue, NW Washington, DC 20004
TIME:	1:40 p.m. to 2:00 p.m. (approximately)
PARTICIPANTS:	Kedric L. Payne Omar S. Ashmawy Robert K. Kelner Derek Lawlor

SUMMARY: The witness is the Campaign Director for Schock for Congress, which is the congressional campaign committee of Representative Aaron Schock. The OCE requested an interview with the witness on July 26, 2012, and she consented to an interview. The witness made the following statements in response to our questioning:

1. The witness was given an 18 U.S.C. § 1001 warning and consented to an interview.

2. She refused to sign a written acknowledgement of the warning that her statements are subject to the False Statements Act.

3. The witness is an employee of Schock for Congress and serves as the Campaign Director. She has served as the Campaign Director for approximately two and one half years.

4. When asked whether she has worked or volunteered for any other campaigns since 2010, the witness stated that she has also volunteered for: the campaign committee of Representative Bobby Schilling, Bobby Sullivan, and the school board election committee of Rick Cloyd.

5. The witness stated that her job duties as Campaign Director for Schock for Congress are to: oversee the operations of the campaign office; coordinate fundraisers; review reports for the Federal Election Commission; deposit contributions; make contributions to other campaign committees; and send thank you notes to donors.

6. The witness told the OCE that either Congressman Schock or his Chief of Staff, Steve Shearer tells her when to make contributions from Schock for Congress to other

committees. When instructed, the witness writes checks to the designated campaign committees. She is authorized to sign checks for Schock for Congress.

7. The witness reports to Representative Schock and sometimes to Mr. Shearer.

8. Schock for Congress has two part-time staffers who report to her, Gina Kampf and Cindy Crusan.

9. The witness is familiar with the 18th District Republican Central Committee. She assisted the committee with establishing its bank account.

10. The witness told the OCE that a few days before March 16, 2012, Mr. Shearer called her and told her to contribute $25,000 from 18th District Republican Central Committee to the Campaign for Primary Accountability ("CPA").

11. When Mr. Shearer asked the witness to make the contribution, she asked him if it was ok because she thought it was a lot of money. He told her that it was ok.

12. The witness made the contribution on the CPA website using their "echeck" form. She told the OCE that she had the information necessary to make the payment because she knew the banking information of the 18th District Central Republican Committee from when she established the account (*i.e.* the account number and the bank routing number). She also routinely deposits money into the committee's account from Representative Schock's joint fundraising committee, Schock Victory Fund.

13. The witness stated that she did not recall needing to get approval from anyone else other than Mr. Shearer in order to make the contribution. The witness did not recall speaking to Mr. Bigger prior to making the contribution.

14. The witness stated that Mr. Shearer did not explain why the contribution was being made to CPA. The witness stated that she did not speak to Representative Schock at that time about the contribution. The witness did not recall if Mr. Shearer told her if anyone requested that the contribution be made.

15. The witness stated that she is not sure why Mike Bigger of the 18th District Central Republican Committee did not make the contribution to CPA online.

16. The witness stated that after she made the contribution, someone from CPA called or emailed her and told her that it would take a significant amount of time to process the payment online and asked whether a wire transfer could be made.

17. The witness was shown an email from Hannah Christian of CPA to the witness, dated March 16, 2012 (CPA 000003). The witness identified the email as the communication

she received about the refund of the online payment and a request for a wire transfer instead due to the delay in processing the online payment.

18. The witness called Mr. Shearer to tell him about the need for a wire transfer. She stated that she was not authorized to make a wire transfer.

19. The witness stated that Mr. Shearer contacted Mr. Bigger for him to make the contribution from 18th District Central Republican Committee to CPA via a wire transfer.

20. The witness told the OCE that she does not know Rodney Davis and never communicated with him.

This memorandum was prepared on July 31, 2012, based on the notes that the OCE staff prepared during the interview with the witness on July 26, 2012. I certify that this memorandum contains all pertinent matter discussed with the witness on July 26, 2012.

Kedric L. Payne
Deputy Chief Counsel

EXHIBIT 12

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

OFFICE OF CONGRESSIONAL ETHICS
UNITED STATES HOUSE OF REPRESENTATIVES

MEMORANDUM OF INTERVIEW

IN RE:	Representative Schock's Chief of Staff
REVIEW NO.:	12-9525
DATE:	July 20, 2012
LOCATION:	425 3rd Street, SW Washington, DC 20024
TIME:	4:30 p.m. to 5:10 p.m. (approximately)
PARTICIPANTS:	Kedric L. Payne Omar S. Ashmawy Robert K. Kelner Derek Lawlor

SUMMARY: The witness is the Chief of Staff for Representative Aaron Schock. The OCE requested an interview with the witness on July 20, 2012, and he consented to an interview. The witness made the following statements in response to our questioning:

1. The witness was given an 18 U.S.C. § 1001 warning and consented to an interview.
2. He refused to sign a written acknowledgement of the warning that his statements are subject to the False Statements Act.
3. The witness is currently the Chief of Staff for Representative Schock. He has held that position for about three years and a half. Before that, the witness was Representative Schock's campaign manager. Prior to serving as Representative Schock's campaign manager, the witness worked as a campaign manager for other candidates.
4. The witness also currently works on Representative Schock's campaign committee, in an "unofficial" capacity.
5. In addition to working for Representative Schock, the witness has consulting contracts with two other non-federal campaigns. Also, he may consult on state or federal campaign "informally."
6. The witness is the Vice-Chairman of the Peoria County Republican Central Committee.
7. When asked if he consulted on Representative John Shimkus' campaign, the witness said no.

8. When asked if he works with the 18th District Republican Central Committee ("18th District Committee"), the witness said no, but that he is friends with the Chairman of the 18th District Committee, Mike Bigger, and they "talk politics" regularly. When asked to clarify what "talk politics" means, the witness said that people ask him what they should do on their campaign to win. He said that with Mr. Bigger, it is different. They speak about the state of play regarding campaigns, where "things are going," and party leadership.

9. When asked if there is anyone else affiliated with the 18th District Committee with whom he communicates, the witness explained that the Chairperson of the Peoria County Republican Central Committee is associated with the 18th District Committee.

10. The witness does not have an official title for his work on Representative Schock's campaign. He is an "unofficial political advisor." When asked what kind of advice he provides, the witness responded that "it varies." If invitations to events are received, the witness will give his opinion on whether it is important for Representative Schock to attend.

11. The witness also lets Representative Schock know how candidates are doing and advises Representative Schock on his political future. To a lesser extent the witness also advises Representative Schock on to whom to contribute money. Most of the time Representative Schock will "run something by" the witness.

12. When asked if he works on fundraising for Representative Schock, the witness said that he does not really do that – that the most he does is consult with Representative Schock on who would be a good speaker to bring back to Representative Schock's district. When asked if he vets people asking for a contribution from Representative Schock's campaign and PAC accounts, the witness replied, "not frequent, but yes."

13. The witness knows Mr. Rodney Davis. Mr. Davis is a candidate for Congress, but the witness has known Mr. Davis for about 9 or 10 years. Before running for Congress, Mr. Davis was the Executive Director of the Illinois State Republican Party. He also worked for Representative Shimkus, however the witness did not remember Mr. Davis' title. He did recall that Mr. Davis was "number two" at the district office. Mr. Davis also worked for Representative Shimkus' campaign. The witness did not recall Mr. Davis title, but described him as a "senior campaign person."

14. The last time the witness communicated with Mr. Davis was at the end of June when Mr. Davis called to tell the witness what Mr. Davis' "fundraising numbers" were going to be. When asked if he and Mr. Davis discussed the OCE investigation, the witness stated that in May of this year he let Mr. Davis know the OCE asked to speak with him. When asked for Mr. Davis' reply, the witness said he did not remember him saying anything

directly. Mr. Davis "mostly just took note of it." When asked why he told Mr. Davis about the OCE investigation, the witness stated he told him because "I'd asked for the wire information for CPA." When asked what the "wire transfer" had to do with the OCE, the witness replied that they were talking about "our support of Representative Kinsinger" and that there "were other things going on about that."

15. According to the witness, Mr. Davis seemed mildly surprised. The witness did not tell Mr. Davis to not speak with the OCE.

16. The witness asked Mr. Davis for the wire information for CPA because Mr. Davis "knew everyone" and the witness thought he would have the information. The witness said that he needed it because Mr. Bigger asked the witness to get it.

17. Representative Schock also asked if the witness could send the wire transfer information to David Herro.

18. According to the witness, Mr. Bigger contacted the witness to ask for the wire transfer information after Mr. Bigger and Representative Schock had a conversation. This conversation occurred about eight or nine days prior to the Kinsinger primary. Mr. Bigger and Representative Schock met in Illinois and Mr. Bigger told Representative Schock that he wanted to contribute to CPA if the money could be used to help Representative Kinsinger.

19. Representative Schock told the witness about this conversation a day or two afterwards

20. According to the witness, Representative Schock did not ask Mr. Bigger to contribute.

21. Mr. Bigger wanted to make a contribution to CPA from the 18th District Committee account.

22. The witness knows Mr. David Herro – he is a major donor in Chicago to many Republican candidates.

23. On or about March 15, 2012, Representative Schock had a conversation with Mr. Herro. When the conversation was over, Representative Schock said Mr. Herro wanted to make a contribution to CPA and asked the witness to get the wire transfer information to Mr. Herro.

24. The witness believes this conversation took place in Illinois, but he was not with Representative Schock at the time. The conversation between Representative Schock and the witness took place over the phone.

25. The witness provided Mr. Herro with the wire transfer for CPA.

26. The witness did not know if Representative Schock asked Mr. Herro to give a contribution to CPA as it was a private conversation. When asked if Representative Schock provided the witness with any additional information, the witness stated that Representative Schock told him that Mr. Herro was going to make a contribution and to get the wiring information to him. Representative Schock did not tell the witness how much Mr. Herro was going to contribute.

27. Mr. Rodney Davis did not ask the witness to contribute to CPA.

28. The witness was shown an email from Rodney Davis to the witness, dated March 14, 2012 (SCH_000047).

29. The witness was asked if he had seen the email before. He replied that he thought the email was the one Mr. Davis sent to him earlier so that the witness had the wiring information for CPA.

30. The witness was shown an email from him to Representative Schock and David Herro, dated March 12, 2012 (SCH_000043).

31. The witness had seen this email previously. The email address containing "DGH" is the email for Mr. Herro.

32. When asked the significance of the statement in the email about the link, the witness said that "Can do" refers to Mr. Herro. It was to let Representative Schock know that the witness followed up on Representative Schock's request.

33. The witness could not recall if he referred anyone else to CPA for the purpose of making a contribution.

34. The witness is fairly sure he did not ask anyone else to contribute.

35. When asked if he or anyone else asked Representative Eric Cantor or anyone on Representative Cantor's staff to make a contribution to CPA, the witness replied that after Representative Schock had a conversation with Representative Cantor, Representative Schock asked the witness to get in touch with Mr. Rob Collins "to see what they can do."

36. When asked "to see what they can do" meant, the witness said it meant that Purple Strategies or the Young Guns Network might help Kinsinger in some way.

37. The witness called Mr. Collins and Mr. Collins told the witness that he would see what he could do. The witness told Mr. Collins that the race was very close. Mr. Collins replied to the witness – "ok let me see what I can do."

38. A few days afterwards Mr. Collins called the witness and said that they were going to do their own radio spot. When asked to clarify if "they" meant Purple Strategies or Young Guns, the witness said he did not know.

39. When asked what the relationship was between Purple Strategies and Young Guns, the witness said he did not know.

This memorandum was prepared on August 1, 2012, based on the notes that the OCE staff prepared during the interview with the witness on July 20, 2012. I certify that this memorandum contains all pertinent matter discussed with the witness on July 20, 2012.

Omar S. Ashmawy
Staff Director and Chief Counsel

EXHIBIT 13

FEC FORM 1

STATEMENT OF ORGANIZATION

(See instructions)

Office use only

1. NAME OF COMMITTEE (in full) [ ] (Check if name is changed) Example: If typing, type over the lines 12FE4M5

Schock Victory Committee

ADDRESS (number and street) 2470 Daniells Bridge Rd Ste. 121

[X] (Check if address is changed)

Athens | GA | 30606 -

CITY ▲ STATE ▲ ZIP CODE ▲

COMMITTEE'S E-MAIL ADDRESS (Please provide only one e-mail address)

[ ] (Check if address is changed) [redacted]@pdscompliance.com

COMMITTEE'S WEB PAGE ADDRESS (URL)

[ ] (Check if address is changed)

2. DATE M M 10 / D D 20 / Y Y Y Y 2009

3. **FEC IDENTIFICATION NUMBER** C C00469395

4. IS THIS STATEMENT [X] NEW (N) **OR** [ ] AMENDED (A)

I certify that I have examined this Statement and to the best of my knowledge and belief it is true, correct and complete

Type or Print Name of Treasurer **Paul Kilgore**

Signature of Treasurer Electronically Filed by **Paul Kilgore** Date M M 06 / D D 10 / Y Y Y Y 2011

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. §437g.

ANY CHANGE IN INFORMATION SHOULD BE REPORTED WITHIN 10 DAYS

Office Use Only				

For further information contact:
Federal Election Commission
Toll Free 800-424-9530
Local 202-694-1100

FEC FORM 1
(Revised 02/2009)

5. TYPE OF COMMITTEE (Check One)

Candidate Committee:

(a) ☐ This committee is a principal campaign committee. (Complete the candidate information below.)

(b) ☐ This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)

Name of Candidate

Candidate Party Affiliation ☐ Office Sought: ☐ House ☐ Senate ☐ President State ☐ District ☐

(c) ☐ This committee supports/opposes only one candidate, and is NOT an authorized committee.

Name of Candidate

Party Committee:

(d) ☐ This committee is a ☐ (National, State (or subordinate) committee of the ☐ (Democratic, Republican,etc.) Party.

Political Action Committee (PAC):

(e) ☐ This committee is a separate segregated fund. (Identify connected organization on line 6.) Its connected organization is a:

☐ Corporation ☐ Corporation w/o Capital Stock ☐ Labor Organization

☐ Membership Organization ☐ Trade Association ☐ Cooperative

☐ In addition, this committee is a Lobbyist/Registrant PAC.

(f) ☐ This committee supports/opposes more than one Federal candidate, and is NOT a separate segregated fund or party committee. (i.e., nonconnected committee)

☐ In addition, this committee is a Lobbyist/Registrant PAC.

☐ In addition, this committee is a Leadership PAC. (Identify sponsor on line 6.)

Joint Fundraising Representative:

(g) [X] This committee collects contributions, pays fundraising expenses and disburses net proceeds for two or more political committees/organizations, at least one of which is an authorized committee of a federal candidate.

(h) ☐ This committee collects contributions, pays fundraising expenses and disburses net proceeds for two or more political committees/organizations, none of which is an authorized committee of a federal candidate.

Committees Participating in Joint Fundraiser

1. **Schock for Congress** FEC ID number C **C00437756**
2. **GOP Generation Y Fund** FEC ID number C **C00448191**
3. **18th District Republican Central Committee** FEC ID number C **C00493460**
4. **National Republican Congressional Committee** FEC ID number C **C00075820**

Write or Type Committee Name

Schock Victory Committee

6. **Name of Any Connected Organization, Affiliated Committee, Joint Fundraising Representative, or Leadership PAC Sponsor**

None

Mailing Address

CITY STATE ZIP CODE

Relationship:

☐ Connected Organization ☐ Affiliated Committee ☐ Joint Fundraising Representative ☐ Leadership PAC Sponsor

7. **Custodian of Records:** Identify by name, address, (phone number -- optional), and position of the person in possession of Committee books and records.

Full Name

Mailing Address

Title or Position CITY STATE ZIP CODE

Telephone number

8. **Treasurer:** List the name and address (phone number -- optional) of the treasurer of the committee; and the name and address of any designated agent (e.g., assistant treasurer).

Full Name of Treasurer **Paul Kilgore**

Mailing Address **2470 Daniells Bridge Rd Ste. 121**

Athens **GA** **30606**

Title or Position CITY STATE ZIP CODE

Treasurer

Telephone number **706** – **534** – [redacted]

Full Name of Designated Agent

Mailing Address

Title or Position ▼ CITY ▲ STATE ▲ ZIP CODE ▲

Telephone number – –

9. **Banks or Other Depositories:** List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of Bank, Depository, etc.

PNC Bank

Mailing Address **301 SW Adams St**

Peoria **IL** **61602** –

CITY ▲ STATE ▲ ZIP CODE ▲

Name of Bank, Depository, etc.

Mailing Address

CITY ▲ STATE ▲ ZIP CODE ▲

EXHIBIT 14

From: Rodney Davis <[redacted]@volunteersforshimkus.org>
To: Steve Shearer <[redacted]@aol.com>
Cc: Craig Roberts <[redacted]@gmail.com>
Subject: Fwd: Contribution info
Date: Wed, Mar 14, 2012 2:49 pm
Attachments: CPA_prospectus_and_reply_form.pdf (510K), CPA_Wiring_Instructions.pdf (73K)

Begin forwarded message:

From: "Jamie Story" [redacted]@citizenleaderalliance.org>
Date: March 14, 2012 1:20:10 PM CDT
To: <[redacted]@volunteersforshimkus.org>
Cc: "Eric O'Keefe" <[redacted]@eokeefe.com>
Subject: Contribution info

Rodney,
Thank you so much for helping us out. I'll let you know as soon as I hear from John, our head Republican strategist.

In the meantime, I've attached two documents: one is a short prospectus with a contribution reply form at the end (ideally, this completed form would accompany any checks that are mailed). I'm also attaching wiring instructions. Finally, the easiest thing might be for people to donate online here: https://secure.piryx.com/donate/FnTy7rRg/Campaign-for-Primary-Accountability/. Online contributors can either pay by eCheck or credit card (eCheck is essentially the same as wiring).

I'll be in touch as soon as I hear from John re: TV/radio buys. Thank you again!

~Jamie

Jamie Story
President
The Citizen Leader Alliance
P.O. Box 27133
Houston, Texas 77227
[redacted] – Cell

SCH-000047

EXHIBIT 15

From: Jonathan Martin <[redacted]@ceterusinc.com>
Subject: **Re: $25,000**
Date: March 16, 2012 10:02:10 AM CDT
To: Hannah Christian <[redacted]@alliance4selfgovernance.org>
Cc: [redacted]@asappublicaffairs.com" <[redacted]@asappublicaffairs.com>, Jamie Story [redacted]@citizenleaderalliance.org>

Hannah,

The $25K came in this morning, thanks.

On Thu, Mar 15, 2012 at 8:35 PM, Jonathan Martin <[redacted]@ceterusinc.com>wrote:

> Absolutely, I'll keep an eye out.
>
> Jonathan Martin
> www.ceterusinc.com
> [redacted] (c)
> 800.878.6742 (f)
>
> On Mar 15, 2012, at 5:12 PM, Hannah Christian <[redacted]@alliance4selfgovernance.org> wrote:
>
> > I spoke with Tania not long ago. CPA will be receive a wire for $25,000 tomorrow. I will refund the online contribution.
> >
> > Jonathan - will you please let me know when the $25K shows up in our account? I'd like to let Tania know when we receive it.
> >
> > Thanks!
> > Hannah

--
Jonathan Martin
Ceterus, Inc.
Office 269.544[redacted]
Direct 843.471[redacted]

Cell [redacted]
1739 Maybank Highway, Suite T-346 | Charleston, SC 29412
www.ceterusinc.com
*Member, Charleston Metro Chamber of Commerce
*

Circular 230 disclosure:
The Internal Revenue Service recently issued regulations that require written advice regarding tax matters to meet very detailed and comprehensive requirements before it can be relied upon by a taxpayer to avoid penalties that might apply if the tax benefits or results discussed in the document are disallowed. Compliance with these rigorous standards and requirements exceeds the scope of this engagement. Consequently, the analysis and advice contained in this document regarding federal tax matters is not intended to be used, and may not be relied upon by you, for the purpose of avoiding any federal tax penalty.

EXHIBIT 16

Print | Close Window

Subject: Re: Contribution
From: tania hoerr <[redacted]@aaronschock.com>
Date: Wed, Mar 14, 2012 4:31 pm
To: Hannah Christian <[redacted]@campaign4primaryaccountability.org>

Hi Hannah,
You can address the letter to the 18th District Committee. Mike Bigger is the treasurer of that committee.

Thanks,
Tania

On Wed, Mar 14, 2012 at 4:14 PM, Hannah Christian <[redacted]@campaign4primaryaccountability.org> wrote:

Hello Tonya,

Jamie Story asked that I contact you. I am the Development Coordinator for Campaign for Primary Accountability (CPA). I am trying to send a thank you letter for the contribution from the 18th Congressional District Republican Central Committee. I'm not sure who, with the organization, I should address this to.

Can you help with this?

Thank you,
Hannah

Hannah Christian
Development Coordinator
281-796-[redacted]

--
Tania Hoerr
Campaign Director
Schock for Congress
PO Box 10555
Peoria, IL 61612
309.693.[redacted] Office
309.693.9580 Fax
[redacted] Cell

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EXHIBIT 17

Print | Close Window

Subject: Wire Transfer Received
From: "Hannah Christian" <[redacted]@campaign4primaryaccountability.org>
Date: Fri, Mar 16, 2012 10:14 am
To: [redacted]@aaronschock.com

Good morning Tania,

Our accountant notified me that the $25,000 contribution was received this morning. I have asked Pyrix to refund the original contribution to the 18th Congressional District. I was told that they have a very slow process when it comes to refunding online gifts. Please let me know if you do not receive a refund by next Thursday. I will be more than happy to call them and see where the money is.

Thank you so much for all of your help.

Hannah

281-796-[redacted]

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EXHIBIT 18

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

OFFICE OF CONGRESSIONAL ETHICS
UNITED STATES HOUSE OF REPRESENTATIVES

MEMORANDUM OF INTERVIEW

IN RE:	Donor 1
REVIEW NO.:	12-9525
DATE:	July 25, 2012
LOCATION:	Two North LaSalle Street Chicago, IL 60602
TIME:	9:30 a.m. to 9:50 a.m. (approximately)
PARTICIPANTS:	Kedric L. Payne Omar S. Ashmawy

SUMMARY: Donor 1 is the Chief Investment Officer for International Equity of Harris Associates L.P. The OCE requested an interview with Donor 1 (the "witness") on July 25, 2012, and he consented to an interview. The witness made the following statements in response to our questioning:

1. The witness was given an 18 U.S.C. § 1001 warning and consented to an interview. He signed a written acknowledgement of the warning, which will be placed in the case file in this review.

2. The witness is currently employed with Harris and Associates where he is the Chief Investment Officer for International Equity.

3. The witness told the OCE that he has known Representative Aaron Schock since 2008. He met Representative Schock during one of his campaigns for public office.

4. He estimates that he speaks with Representative Schock approximately once or twice every six weeks during an election year. The conversations generally relate to the witness organizing fundraisers for Representative Schock or the witness connecting Representative Schock with other elected officials.

5. During non-election years, the witness estimates that he speaks with Representative Schock once every six months.

6. The most recent fundraiser that the witness held for Representative Schock was around March 2012.

7. The witness most recently communicated with Representative Schock during a dinner on or about July 21, 2012. The witness stated that he and Representative Schock did not discuss the OCE matter.

8. The witness stated that during the past month he spoke with Representative Schock's attorney who is located in Washington, DC about the OCE investigation. The attorney asked the witness about his contribution to the Campaign for Primary Accountability ("CPA").

9. The witness recalled that on or about March 11, 2012, he received a phone call from Representative Schock. Representative Schock asked him if he would help with Representative Kinzinger's race in Illinois as it was going to be a tight race.

10. The witness told Representative Schock that he would help. Representative Schock said he would forward him information on how to help.

11. The witness told the OCE that Representative Schock did not request any amount of support for him to give.

12. The witness stated that he received an email from an email address for "GOP Steve". The email forwarded information about CPA.

13. The witness was shown an email from Steve Shearer to the witness and Representative Schock, dated March 14, 2012 (SCH000043). The witness recalled that this email is what he received concerning CPA.

14. After he received the email on March 14, 2012, he contacted Jamie Story of CPA to ask to see the television commercial that CPA planned to broadcast related to Representative Kinzinger's primary election.

15. The witness told the OCE that he wanted to view the commercial and approve it before contributing to CPA. The witness viewed the commercial and approved.

16. Ms. Story informed the witness that CPA wanted to raise $100,000 in three days. Based on this fundraising goal, the witness decided to contribute $35,000 to CPA.

17. The witness told the OCE that he solicited the following individuals to contribute to CPA to reach the $100,000 fundraising goal: Anne Griffin, John Canning, and Ron Gidwitz. He stated that he told each of these individuals that he was contributing $35,000 and he asked if each could help reach the $100,000 goal.

18. The witness explained that the "David Herro Trust" is his bank account and he is the sole member of the Trust.

19. The witness told the OCE that he met Rodney Davis for the first time in July 2012 and he has not discussed CPA with Mr. Davis.

20. The witness does not know Rob Collins.

21. The witness stated that he has never met Representative Shimkus to the best of his knowledge.

22. The witness received a phone call from Anne Griffin's attorney, Kenneth Gross, within the 24 hours preceding his interview with the OCE. Mr. Gross asked him questions about the witness' contribution to CPA and communications with Ms. Griffin.

This memorandum was prepared on August 1, 2012, based on the notes that the OCE staff prepared during the interview with the witness on July 25, 2012. I certify that this memorandum contains all pertinent matter discussed with the witness on July 25, 2012.

Kedric L. Payne
Deputy Chief Counsel

EXHIBIT 19

From: Steven Shearer <[redacted]@aol.com>
To: aaronschock <[redacted]@aol.com>;[redacted]@gmail.com>
Subject: Fwd: Contribution info, SUPER PAC Kinzinger-Manzullo
Date: Wed, Mar 14, 2012 3:07 pm
Attachments: CPA_prospectus_and_reply_form.pdf (510K), CPA_Wiring_Instructions.pdf (73K)

Can do an electronic check with the link below, or wire.

-----Original Message-----
From: Rodney Davis <[redacted]@volunteersforshimkus.org>
To: Steve Shearer <[redacted]@aol.com>
Cc: Craig Roberts <[redacted]@gmail.com>
Sent: Wed, Mar 14, 2012 2:49 pm
Subject: Fwd: Contribution info

Begin forwarded message:

From: "Jamie Story" <[redacted]@citizenleaderalliance.org>
Date: March 14, 2012 1:20:10 PM CDT
To: <[redacted]@volunteersforshimkus.org>
Cc: "Eric O'Keefe" [redacted]@eokeefe.com>
Subject: Contribution info

Rodney,
Thank you so much for helping us out. I'll let you know as soon as I hear from John, our head Republican strategist.

In the meantime, I've attached two documents: one is a short prospectus with a contribution reply form at the end (ideally, this completed form would accompany any checks that are mailed). I'm also attaching wiring instructions. Finally, the easiest thing might be for people to donate online here: https://secure.piryx.com/donate/FnTy7rRg/Campaign-for-Primary-Accountability/. Online contributors can either pay by eCheck or credit card (eCheck is essentially the same as wiring).

I'll be in touch as soon as I hear from John re: TV/radio buys. Thank you again!

~Jamie

Jamie Story
President
The Citizen Leader Alliance
P.O. Box 27133
Houston, Texas 77227
[redacted] – Cell

EXHIBIT 20

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

OFFICE OF CONGRESSIONAL ETHICS
UNITED STATES HOUSE OF REPRESENTATIVES

MEMORANDUM OF INTERVIEW

IN RE:	Donor 2
REVIEW NO.:	12-9525
DATE:	July 25, 2012
LOCATION:	155 North Wacker Drive Chicago, IL 60606
TIME:	3:00 p.m. to 3:20 p.m. (approximately)
PARTICIPANTS:	Kedric L. Payne Omar S. Ashmawy Kenneth A. Gross Patricia M. Zweibel Adam Cooper

SUMMARY: Donor 2 is the Managing Partner of Aragon Global Management. The OCE requested an interview with Donor 2 (the "witness") on July 25, 2012, and she consented to an interview. The witness made the following statements in response to our questioning:

1. The witness was given an 18 U.S.C. § 1001 warning and consented to an interview. She signed a written acknowledgement of the warning, which will be placed in the case file in this review.

2. The witness is the Managing Partner of Aragon Global Management.

3. She told the OCE that she has known Representative Schock since sometime after 2010. She met him when a fundraising coordinator asked to bring Representative Schock by to introduce him to the witness.

4. The witness and Representative Schock rarely communicate. She most recently communicated with Representative Schock around May 2012 at a fundraiser for presidential candidate Mitt Romney.

5. She estimated that she has communicated with him on fewer than ten occasions over the past two years.

6. She stated that she does not know any of Representative Schock's congressional or campaign staff, including Steve Shearer.

7. She first became familiar with the Campaign for Primary Accountability ("CPA") when she was contacted by David Herro in March 2012.

8. She believes Mr. Herro contacted her by email. He explained to her who CPA was, that they were involved in supporting Representative Kinzinger in his primary election, and that he was going to make a contribution to CPA.

9. She asked Mr. Herro how much he was contributing and he told her $35,000.

10. She told the OCE that she did not discuss contributing to CPA with Mr. Shearer, Representative Schock, or Rodney Davis.

11. She does not know Robert Collins.

This memorandum was prepared on July 31, 2012, based on the notes that the OCE staff prepared during the interview with the witness on July 25, 2012. I certify that this memorandum contains all pertinent matter discussed with the witness on July 25, 2012.

Kedric L. Payne
Deputy Chief Counsel

EXHIBIT 21

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

OFFICE OF CONGRESSIONAL ETHICS
UNITED STATES HOUSE OF REPRESENTATIVES

MEMORANDUM OF INTERVIEW

IN RE:	Lobbyist Donor 1
REVIEW NO.:	12-9525
DATE:	July 17, 2012
LOCATION:	425 3rd Street, SW Washington, DC 20024
TIME:	1:07 p.m. to 1:56 p.m. (approximately)
PARTICIPANTS:	Kedric L. Payne Paul J. Solis

SUMMARY: Lobbyist Donor 1 (the "witness") works for the American College of Radiology Association. The OCE requested an interview with the witness on July 17, 2012, and he consented to an interview. The witness made the following statements in response to our questioning:

1. The witness was given an 18 U.S.C. § 1001 warning and consented to an interview. He signed a written acknowledgement of the warning, which will be placed in the case file in this review.

2. The witness is employed with the American College of Radiology Association ("ACR"). He is the Director of RADPAC and Political Education. He stated that he will eventually volunteer with some campaigns this year. ACR employs three lobbyists in-house. The witness is a registered lobbyist.

3. His stated that his job duties for ACR are to raise money for RADPAC from ACR members and to spend the money on various political campaigns.

4. The following two employees in ACR's government relations group report to the witness: Heather Kaiser and Melody Ballesteros. The witness reports to Cindy Moran and Josh Cooper.

5. The witness told the OCE that he primarily makes the decisions on RADPAC contributions and he considers various factors. He considers whether the campaign being supported is for a congressional committee with jurisdiction over ACR. He also considers the relationships that he, staff, and ACR members have with Members of Congress.

6. He estimates that he receives approximately 80 fundraising requests and invitations per day, which he reviews. These requests are usually emails or phone calls. The phone calls generally are from the chiefs of staff of Members of Congress or their fundraisers. He is also contacted directly by Members of Congress, but not frequently. He also receives solicitations via facsimile.

7. The witness stated that he is not very familiar with the Campaign for Primary Accountability ("CPA") and he does not know anyone who is employed with CPA. The witness stated that he does not really agree with everything CPA does.

8. He told the OCE that he is aware that RADPAC contributed $5,000 to CPA in March 2012. He believes that someone for another organization, not CPA, requested that RADPAC contribute to CPA. He stated that someone from Young Guns Majority Victory Fund ("Young Guns") may have requested that RADPAC contribute to CPA.

9. The witness has known Representative Aaron Schock since the fall of 2010. He communicates with Representative Schock a few times per month. The witness stated that the communications generally involve fundraising. The witness told the OCE that he also personally knows Representative Schock's chief of staff, legislative director, legislative aide, and fundraising team.

10. The witness stated that he last talked to Representative Shock a week or two ago and has had no conversation with Representative Shock about the OCE's review.

11. The witness stated that he knows Rob Collins and that Rob Collins is affiliated with Young Guns and worked for Representative Cantor.

12. The witness was shown an email from Rob Collins to the witness, dated March 15, 2012 (CPA000018). He stated that he does not remember the conversation referenced in the email between Mr. Collins and him.

13. The document refreshed the witness' recollection and he told that OCE that he likely spoke to Mr. Collins the morning of March 15. The witness stated that he guessed he asked "how can I help?" with the primary election of Representative Adam Kinzinger and then someone told him to get in contact with Rob Collins.

14. The witness described Mr. Collins as the facilitator putting him in contact with CPA such that ACR could make a contribution to CPA. The witness believes that he reached to Mr. Collins to ask about other ways the witness could support Representative Kinzinger because ACR had already made the maximum contributions to Representative Kinzinger's campaign committee.

15. The witness told the OCE that he does not believe that Representative Schock told him to contact Mr. Collins. He stated that Representative Cantor did not ask him to contact Mr. Collins. The witness knows Representative Cantor "a little bit" because it is hard to get more than a few minutes with him.

16. The witness was shown an email from him to Mr. Collins, copying Jamie Story of CPA, dated March 15, 2012 (CPA000017). When asked why in the email he told Mr. Burnes "We'll do $5k and credit Schock," he stated that it is customary in "the industry" to credit someone for a contribution. The witness stated that whether someone asks to be credited or not, "we want to give it to them." It is typically done for party contributors.

17. He provided the OCE with a hypothetical example of a donor crediting a contribution to a Member of Congress. He described a Member of Congress requesting a contribution from ACR to another campaign, ACR making the contribution, ACR asking the campaign to credit the Member of Congress who requested the contribution.

18. The witness told the OCE that although he asked Mr. Collins to credit Representative Schock for the campaign, Representative Schock did not ask him to make the contribution.

19. He stated that he is not sure whether he told Representative Schock that he credited him with ACR's contribution to CPA. In the past, he has informed Representative Schock about other contributions that he credited to him.

20. The witness stated that he credited Representative Schock because he knew he was a close personal friend of Representative Kinzinger. He knew this through talking to the members at events and through conversation.

21. The witness also requested that Representative Schock receive credit for the contribution to CPA because he recognized that Representative Kinzinger may learn of the contribution and the credit would help Representative Schock's relationship with Representative Kinzinger.

22. He stated that Representative Schock had asked ACR to contribute to Representative Kinzinger's campaign and ACR in turn contributed the maximum amount to Representative Kinzinger's campaign for the primary and general elections.

23. The witness told the OCE that he does not remember whether Representative Schock told him to speak to Young Guns concerning supporting Representative Kinzinger's race. Although the witness stated that he may have discussed Young Guns in general at some point with Representative Schock.

24. He has known Representative John Shimkus for approximately five or six years and he communicates with him frequently when the witness travels to the Capitol. He also knows Craig Roberts and Chris Sarley, who are staffers for Representative Shimkus.

25. The witness stated that he initially met Rodney Davis in April or May of 2012. Mr. Davis did not ask him contribute to CPA.

26. He has not contributed to the 18th District Central Republican Committee and has not discussed the committee with Representative Schock. He told the OCE that he does not know of any affiliation Representative Schock may have with the committee.

27. The witness stated that he does not believe that he asked any individual or entity to contribute to CPA other than ACR.

This memorandum was prepared on August 3, 2012, based on the notes that the OCE staff prepared during the interview with the witness on July 17, 2012. I certify that this memorandum contains all pertinent matter discussed with the witness on July 17, 2012.

Kedric L. Payne
Deputy Chief Counsel

EXHIBIT 22

From: Burnes, Ted [redacted]@acr.org]
Sent: Thursday, March 15, 2012 9:59 AM
To: [redacted]@purplestrategies.com
Cc: [redacted]@citizenleaderalliance.org
Subject: Re:

Who do we make check to? Is there a FEC Cmte ID#? We'll do $5k and credit Schock.

EXHIBIT 23

From: Rob Collins (Purple Strategies) [[redacted]@purplestrategies.com]
Sent: Thursday, March 15, 2012 10:24 AM
To: Burnes, Ted
Cc: Jamie Story <[redacted]@citizenleaderalliance.org>
Subject:

Hey Ted;

It was good to talk to you today. Below is the Youtube link for the ad that Shimkus, Schock and Cantor have sent money in to support that the Campaign for Primary Accountability is running. They are a 527 organized super PAC. The mailing and wiring information is attached. I have also cc'ed and attached Jamie Story's, the President for the Campaign for Primary Accountability, contact information if you have any questions about where or how to send a contribution. Thanks for the support, we really appreciate it.

Rob

YouTube: http://www.youtube.com/watch?v=IhbzNs7iF5o

Jamie Story
President
The Citizen Leader Alliance
P.O. Box 27133
Houston, Texas 77227
[redacted] – Cell

[see attached file: CPA_prospectus_and_reply_form.pdf] [see attached file: CPA_Wiring_Instructions.pdf]

Rob Collins
Partner
Purple Strategies
[redacted] cell

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EXHIBIT 24

Ray Allen

From: Rob Collins (Purple Strategies) [[redacted]@purplestrategies.com]
Sent: Thursday, March 15, 2012 10:50 AM
To: Ray Allen
Attachments: CPA_prospectus_and_reply_form.pdf; CPA_Wiring_Instructions.pdf

Ray--below is some information for the super pac that is in that IL race. You want me to connect you with the super pac person today via email? ps--we dont need to do $100k as BD said we could, the other Members have done $25k, we should match that.

Hey Ted;

It was good to talk to you today. Below is the Youtube link for the ad that Shimkus, Schock and Cantor have sent money in to support that the Campaign for Primary Accountability is running. They are a 527 organized super PAC. The mailing and wiring information is attached. I have also cc'ed and attached Jamie Story's, the President for the Campaign for Primary Accountability, contact information if you have any questions about where or how to send a contribution. Thanks for the support, we really appreciate it.

Rob

YouTube: http://www.youtube.com/watch?v=IhbzNs7iF5o

Jamie Story
President
The Citizen Leader Alliance
P.O. Box 27133
Houston, Texas 77227
[redacted] – Cell

[see attached file: CPA_prospectus_and_reply_form.pdf] [see attached file: CPA_Wiring_Instructions.pdf]

Rob Collins
Partner
Purple Strategies
[redacted] cell

[see attached file: CPA_prospectus_and_reply_form.pdf] [see attached file: CPA_Wiring_Instructions.pdf]

Rob Collins
Partner
Purple Strategies
[redacted] cell

CAMPAIGN
for
PRIMARY ACCOUNTABILITY

Thank you for considering contributing to the Campaign for Primary Accountability (CPA). Please refer to the information below if you wish to wire funds. If you have any questions, please call Hannah Christian at 281-796-[redacted].

Wiring Instructions:

Campaign for Primary Accountability
3900 Essex Lane, Suite 575
Houston, TX 77027-5175
Phone: (828) 777-[redacted]

Bank of America
3904 Richmond Avenue
Houston, TX 77027

Account Number: [redacted]
Routing Number (wires): [redacted]
(paper and electronic (AHC)): [redacted]

Contributions are not tax deductible. Campaign for Primary Accountability PAC is registered with the Federal Election Commission as an independent expenditure committee and your contribution will be used in connection with federal elections. Unlimited contributions from U.S. citizens, corporations and other organizations are permitted and accepted, except that we cannot accept contributions from foreign nationals, foreign corporations, federal government contractors and national banks. Federal law requires us to use our best efforts to collect and report the name, mailing address, occupation and employer of individuals whose contributions exceed $200 this year.

Paid for by Campaign for Primary Accountability PAC and not authorized by any candidate or committee, 877-795-[redacted]

EC-OCE002

CAMPAIGN
for
PRIMARY ACCOUNTABILITY

Democracy Requires Fair Elections

Washington politicians should be accountable to the citizens in the district they represent. But general elections are not competitive. 85% of U.S. House Districts are dominated by one party and the average incumbent won by 26% in the 2010 general election. This means that the decision on who wins the election is made in the primary of the dominant party 85% of the time. We want more voters to focus on primaries so their vote will count. Our goal is to bring true competition into our electoral process, to give voters real information about their choices, and to restore fair, not fixed elections.

Leveling the Playing Field

Incumbents have a "message monopoly" during primaries; they raise more money (from lobbyists and special interests) and use those funds to tell voters all of the "wonderful" things they've done. Of course, they never speak of the earmarks, pay raises, junkets and generalized corruption that have infected politics in Washington, D.C.

Join Us...

Citizens from across the political spectrum have come together to level the playing field in primary elections through the Campaign for Primary Accountability. We do not have an ideological agenda. And because both parties got our country into the mess we're in, we are working in both Democratic and Republican districts. Your generous donation will help put voters back in control of the process.

NationalJournal 2/9/2012

...The Campaign for Primary Accountability's goal is essentially to enforce term limits on members with low approval ratings and safe CD's according to their polling...The money going into these against the grain efforts, might have an unusual effect on 2012.

USA TODAY 2/10/2012

SUPER PAC TARGETS CONGRESSIONAL INCUMBENTS

...Leaders of a new $1.8 million non-partisan super pac say they're out to level the playing field against entrenched incumbents in Congress though a novel strategy: Targeting them in Primary elections.

NBC5 NBC CHICAGO 2/10/2012

Super PAC Targets Jackson Jr. Race

El Paso Times 2/14/2012

NEW SUPER PAC BACKS EFFORT TO UNSEAT U.S. REP SILVESTRE REYES

THE ENQUIRER Cincinnati.Com 1/30/2012

SUPER PAC TARGETS "OUT OF STEP" SCHMIDT

NationalJournal 1/31/2012

FACING TOUGH PRIMARY, VETERAN REP. BURTON BOWS OUT

Blade Slices – Politics 1/31/2012

...Super PAC Siding with Kucinich in Ohio 9th

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EC-OCE003

CAMPAIGN
for
PRIMARY ACCOUNTABILITY

○ ***Yes I will make a contribution to CPA in the amount of:***

○ $25,000 ○ $5,000 ○ Other $_____

○ $10,000 ○ $1,000

Name _____

Employer _____ Occupation _____

Address _____

City/State/Zip _____

Email _____

Phone _____ Fax _____

Please make checks payable and mail to:

Campaign for Primary Accountability - C/O Jonathan Martin, Treasurer

P.O. Box 22529, Houston Texas 77227-2529

For wiring information contact Jonathan Martin 269-544-[redacted]

For credit card use circle one: *VISA AMEX MC* Sec. Code _____ Exp. Date _____

CC# _____ Signature: _____

Billing Address (if different from above) _____

Contributions are not tax deductible. Campaign for Primary Accountability PAC is registered with the Federal Election Commission as an independent expenditure committee and your contribution will be used in connection with federal elections. Unlimited contributions from U.S. citizens, corporations and other organizations are permitted and accepted, except that we cannot accept contributions from foreign nationals, foreign corporations, federal government contractors and national banks. Federal law requires us to use our best efforts to collect and report the name, mailing address, occupation and employer of the individuals whose contributions exceed $200 this year.

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