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By Office of General Counsel at 11:27 am, Aug 31, 2022

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By Office of the Commission Secretary at 11:43 am, Aug 31, 2022

Joanna Waldstreicher

From: Varoon Modak <vmodak@elias.law>
Sent: Tuesday, August 30, 2022 11:12 PM
To: Amy Rothstein
Cc: Joanna Waldstreicher; Jacquelyn Lopez
Subject: RE: Maggie for NH - Advisory Opinion Request - Supplemental Information

Joanna,

This email is to confirm that the answer to question #1 below applies to both the split-it pages themselves and to the text messages referenced in the request. Both the split-it pages and the text messages would be set up, administered, and drafted by Maggie for NH without the involvement of, or coordination with, the other committees listed on the pages.

Please let us know if you have any other questions.

Thanks,
Varoon

Varoon Modak

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From: Varoon Modak
Sent: Monday, August 22, 2022 11:03 PM
To: ARothstein@fec.gov
Cc: Joanna Waldstreicher <JWaldstreicher@fec.gov>; Jacquelyn Lopez <jlopez@elias.law>
Subject: Maggie for NH - Advisory Opinion Request - Supplemental Information

Amy, thanks again for taking the time to speak with us. Our answers to the follow-up questions that we discussed are below. Please let us know if we can provide any additional information in connection with this request.

1. Would Maggie for NH be coordinating with the other committees listed on the split-it pages?

No. The split-it pages at question in this request would be set up and administered by Maggie for NH without the involvement of, or coordination with, the other committees listed on the pages.

2. Is the use of split-it pages part of a larger effort by the committees listed on the split-it pages to engage in fundraising?

No. While Maggie for NH may choose to separately engage in joint fundraising activities with other committees as part of its overall fundraising activities, those activities would be separate from activity proposed in the request.

3. Who would decide which committees are listed on the split-it pages?

Maggie for NH only.

4. Who would create and administer the ActBlue pages?

Maggie for NH only.

5. Would Maggie for NH itself be listed on the split-it pages?

Yes.

6. Which other committees or entities would be listed on the split-it pages?

The split-it pages could include federal candidates, party committees, or political action committees that are registered with the Commission. No SSFs would be included. All solicitations would be for federally permissible funds and would comply with all relevant requirements of the Act.

7. Are there any costs associated with the use of ActBlue and/or an ActBlue split-it pages?

Maggie for NH would not incur any costs for creation or administration of the ActBlue split-it pages. The costs associated with ActBlue processing contributions to each committee are already borne by those committees pursuant to their existing contractual relationship with ActBlue, as approved by the Commission in Advisory Opinion 2014-13; there are no additional costs incurred by creation of a split-it page.

8. How is a split-it page created on ActBlue?

Any committee can create a split-it page that allows for simultaneous contributions to multiple committees, if the committee has an existing ActBlue account. Such pages can be created without the knowledge or consent of the other committees listed on the pages. Additional information regarding split-it pages is available at: <https://support.actblue.com/campaigns/contribution-form-features/tandem-fundraising/>. Other political contribution processing services such as WinRed also provide a similar feature: <https://support.winred.com/en/articles/3730553-creating-a-team-page>.

9. What does an ActBlue split-it page look like?

An example can be found here: <https://secure.actblue.com/donate/defendthesenate-hassan>

10. How much would each text message cost to send?

The cost of sending a text message varies by service/vendor, but is generally a few cents per text. The cost of a text message would not change based on whether the message is linking to a split-it page as opposed to a page that only allows contributions to Maggie for NH.

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