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Office of General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

OFFICE OF GENERAL
COUNSEL

MUR # 6214

Dear General Counsel,

I am James R Wilkins, a private citizen with no affiliation with any formal group or political party. I have never donated to any group or political party relating to any election effort. I have instead always done my civic duty and voted in every Presidential election. I state this to advise the public that my complaint is not politically motivated. I am motivated by the fact that I feel Long has concealed a problem with the current Presidential election financing process.

I have worked in the Information Technology field for 25 years with the United States Postal Service. As such I am familiar with many computer based processes. When I read articles about Senator Obama's highly successful Internet contribution website, I wonder if they had proper safeguards in place to ensure that all contributions were authentic. As we know, the Internet can be very anonymous and people can hide their true identity. After doing some researches on the Internet in August of 2008, I found some printings and articles that indicated there may be some issues with some of the Obama for America Committee (OFAC) contributions. I have never had any means to look at election contribution filings but I wanted to see the data that these articles were quoting. I found the FEC website and downloaded the respective contribution files for Senators Obama, Clinton, and McCain. I began to analyze them in September of 2008. My first task was to locate the contributions I had read about and then to compare the three major candidates for differences. I quickly began to find patterns in the OFAC contributions that concerned me. The mountain of data was too much to analyze in the short time I had before the election. I decided to wait until after the election to download the post election campaign files to begin a thorough analysis. I wanted to see if the patterns I had discovered indeed were present in large numbers. I have given over one thousand hours filtering the contributions and identifying contribution patterns that do not appear to be the result of random donations on a national basis. My analysis is not complete, but I have collected enough data to present in this complaint. I have read that the committees are only required to maintain their records for three years. I felt it necessary to submit my complaint now before that time limit expires.

This complaint is being filed against the Obama for America Committee (OFAC) because after analyzing the election contribution filings I believe I have uncovered thousands of possible illegal contributions. Many of these illegal contributions I feel have occurred due to the lack of having sufficient control processes in place by the OFAC during the 2008 Presidential campaign. The lack of control processes resulted in thousands of illegal donations being made that have already been documented. I believe as the result of my ten months of research that there are probably many thousands more that were also made that have not been documented. I will present evidence that I hope will convince the Commission to pursue verification of these suspect contributions. This research is mainly based on the ALL_ZIP file for the OFAC which was available for download from the FEC website on December 5, 2008. In some

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cases to be sure I had the latest data: I have used the ALL.ZIP file for the OFAC that was available for download from the FEC website on February 4, 2009.

I am using much of my definition of contribution irregularity on common logic. People tend to do what requires the least amount of effort. We lead demanding lives and none of the premises that I will describe below do not follow common logic. There are contribution premises that I feel are highly improbable given that they would occur between individuals located in completely different parts of the country and in some cases, the world. Until last fall, I had never had reason to familiarize myself with election laws. I have tried to base everything in my complaint on what I have read from the FEC website. I have also tried to ensure the data that I have included with my complaint is accurate and filtered properly to support my analysis. I contacted the FEC in May to see if I could submit evidence in electronic format. I was told this was allowable. I needed to do this as I have over three hundred thousand contribution transactions to present as evidence. I apologize in advance should any of this be in error. I will designate three exhibits of evidence that are in Excel spreadsheet format as electronic exhibits. I will now present my complaint with supporting references and statistical documentation.

One of my main premises to this complaint is that the OFAC did not have proper control processes in place to prevent illegal contributions from entering their website. The Obama for America Committee specifically stated during the 2008 Presidential campaign that they were not checking credit card's statement addresses against the address given by the donors that used their highly successful web site. The reason that was cited by the Obama For America Committee in the October 29, 2008 article by Washington Post reporter Matthew Mosk (see Exhibit P) was "The Obama organization said its extensive review has ensured that the campaign has situated any improper contributions, and noted that Federal Election Commission rules do not require front-end screening of donations." The OFAC did refund or chargeback many instances where the contributions were apparently determined to be illegal. There were also many instances where this did not fully occur. I have not been able to find any documentation on the FEC website that specifically states what steps a committee has to take to guarantee the initial authenticity of a donation. There are steps that are listed should a committee get a contribution that they think or later find out is possibly illegal. Therefore, this allows a committee not to have any basic verification process in place. In the above article by Mr. Mosk, the attitude of the OFAC was summed up with the following quote:

"Lawyers for the Obama campaign said yesterday that their 'extensive business review' has carefully scrubbed contributions to prevent illegal money from entering the operation's war chest. 'I'm pretty sure if I took my error rate and matched it against any other campaign or comparable nonprofit, you'd find we're doing very well,' said Robert Bauer, a lawyer for the campaign."

It is this "extensive back-end review process" that I believe has failed and I hope the evidence I will be presenting will prove just that point. Even Obama spokesman Ben LaPoint admitted they were having difficulty questioning contributions and donation excuse-by-name accounts and the FEC. See Exhibit N. I do not understand why the OFAC would not want to take all available steps to guarantee the authenticity of their donations. This makes one wonder whether their improper use of the Address Verification System, a basic control process, used as standard operating procedure by all internet businesses, was not used by design. After reading about other organization's attempts to find out what control processes were in place, I came away

with the realization that the OFAC was keeping this information from the public. See Exhibit O.

There have already been documented examples of donations that were made in other person's names, both seemingly real and completely fictional. The most noted examples of fictional names that were brought to light in the press being Good Will and Doodad Pro. These were two specific examples of a real person's name being used for illegal donations that was verified. Mr Mosk contacted and verified Mary Biskup, a retired insurance manager from Manchester, Mo, had not contributed \$174,800 that was reported by the OFAC. See Exhibit P. Ms Biskup told Mr. Mosk that she had not donated any money to the Obama campaign or that her credit card showed no activity. Someone else made those 75 individual \$2,300 contributions in Ms. Biskup's name on September 24th and 30th. The OFAC caught this group of illegal donations and made charge backs to the credit card that made the original charges from October 2nd through the 14th. A second instance involved Sharon and Michael Lamm of North Kansas City, Mo. This couple had a \$2,300 donation charged to their credit card. See Exhibit Q. These are the only examples I have found searching the Internet of a "real" person's name being used for illegal donations that has been verified. While these are the only two I located, it indicates that this situation was occurring.

There are several things wrong with the Biskup case that the Commission should investigate. First, this was obviously a violation of Federal Campaign laws. Why didn't the OFAC immediately report this to the FEC and provide you with the credit card number(s) that were used? I have not found any correspondence on your website or on the Internet to indicate that this was even done. Also the fact that such a large amount was charged in the Biskup case, indicates to me that either this was done on a single card with a very large credit line (either a wealthy individual or corporate card) or on multiple credit cards. Again, here is a documented case that was verified that contributions were made in another person's name in violation of Federal Campaign law. If the entity that made these donations had only donated the \$2,300 once, neither the "back-checking process" nor I would have been able to detect it. The same entity that grabbed Ms. Biskup's name and address out of thin air could have also obtained 75 other names and addresses. They could then have donated \$2,300 to each of these names and \$174,800 would have passed undetected by either the OFAC or anyone auditing the donations validity. As we will see in the group of \$2,300 donations, there are cases where this well could have happened.

The next example is the case of the obviously fictitious names such as King Kong, Meng Kong, Es Esh, Uadshu Hdwash, Fni Fndas, as well as Gani Will and Doodad Pro. This group of donors didn't even bother to list a proper street address, occupation, or employer. In these cases, the funds were not charged back for several weeks to a couple of months. Even though these are clearly identifiable as fictitious individuals why did it take the OFAC so long to correct the obvious? In Exhibit A, I have listed the final totals based on the February 4th 2009 downloaded ALLZIP file for the OFAC. In six out of the eleven fictitious donors, all of the money was not returned. In the case of Doodad Pro, an excess of \$1,235.00 was charged back. The fact that the OFAC couldn't get half of the money properly returned in these obvious illegal cases indicates to me a poor accounting process.

I have found another group of donor names that were invalid addresses mostly based on a street in Capitol Heights, Maryland. I have listed them in Exhibit B. This group caught my eye first by the large number of donations from several people with a last name of Anderson. I noticed that their city and state were listed as Capital Heights, Maryland. When I checked the street addresses for those in Capital Heights Maryland

on the U S Postal Service website, there is not a Madison or Davidson Dr in this city. The valid range of addresses for Quinn St is 4200-4405 according to the Postal website. All of the street numbers used for Quinn St were well below this range. This appears to be the result of a single individual or group. A new name was created each month to continue donating. I have listed the contribution summary for this group in Exhibit B.

As you can see by the amounts donated and refunded, the OFAC's "back end review process" missed quite a few transactions here. I have listed the complete transactions in electronic Exhibit 20. I have listed a summation of these donors in Exhibit B with the amounts donated and the amounts refunded or charged back by the OFAC. I used the downloaded 2/5/2009 ALLZIP file to show the final status of any donation corrections made by the OFAC. In this case, some of the illegal contributions were identified by the OFAC but as you can see in Exhibit B all of the donations were not returned. Based on the figure, there were 3,854 donations for a total of \$244,508.00 that were made by the fictitious donors. While this is a small amount compared to the total amount of contributions received by the OFAC, it indicates a problem that could have been avoided with proper use of the Address Verification System. I am curious with the fictitious donors in Exhibit B as to why the OFAC only refunded a small amount of the contributions. If they didn't know they were illegal, what was their rationale for refunding the indicated amounts? If they suspected they were illegal, why didn't they refund all of the contributions?

The contributions described above show without a doubt that the OFAC was not using the Address Verification System properly or other controls for their contribution website. If they were using the AVS system correctly, the OFAC would have been alerted that the address of the card holder did not match with the address that was used for the donation. These fictional names would not have a credit card issued to them for use. Since the first donation for Deedee Pa was November 11, 2007, we know the look of cards go back that far. We also know these donations came from credit cards as all refunds were listed as credit chargebacks. Plainly by evidence of the group of donations listed above, we can again state with certainty that the OFAC was not doing any front end checking of donations.

So hopefully I have established that indeed thousands of documented illegal donations were made to the OFAC by, as yet, unknown parties. Here the OFAC used the Address Verification System properly, as the McCain campaign did, none of these contributions should have been deposited. The effectiveness of the McCain validation process was tested during the election by various groups. They also showed the deficiencies in the OFAC internet process by making several intentional illegal donation attempts on the Obama website. See Exhibits R and O. While I haven't found any of these names in the submitted contributors, they could be in the unsubmitted donors. These donors, numbering over one million, are not known to the public.

I will now list what I believe are contribution patterns that cannot be attributed to random donations by individuals on a national basis. I am going to show contribution patterns that I feel could only occur if some organized effort were under way to make the suspected illegal donations. The only way I feel that the Commission will be able to vindicate my circumstances will be to contact the donors personally and ask if they indeed did make the requested donations. I understand the problem of people moving and this may no longer be possible, but I still feel that there are such a large number of suspect donations that the Commission should be able to contact enough individuals to at least see if my analysis is correct. At the end of my complaint I will suggest a verification plan starting with the contributions I feel were most likely not donated by the listed individuals. If these initial suspect donations prove to have been made by those listed,

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then my complaint is probably not valid. If my suspicions are correct, it will allow you to use your resources more effectively. If you discover a large number of the listed suspected donations were not made by the listed individuals this would be grounds in my opinion to conduct a full audit. I have looked at all of the contributions for last names beginning in I, O, Q, U, V, X, Y, Z. This consisted of 86,091 contributors and 128,338 contributions. These suspect contributions are listed in Electronic Exhibit SM. I found 38.3% of these donors had suspect contributions. The suspect contributions represented 31.7% of all contributions analyzed. These numbers alone should be cause for concern, especially if some earlier verification comes back positive for illegality.

There are several contribution types and patterns that I will discuss. I have listed them with a brief explanation and actual examples, which I hope will be helpful in understanding my research:

Non-Dollar Donation (NDD) – This is a contribution that is not a whole dollar amount. Examples:

CONTRIBUTOR NAME	CITY	STATE	ZIP	AMOUNT	DATE
MOORE, LEANORD	BEACON	NY	126083819	\$28.38	8/18/2007
EDWARDS, SANDRA	FREMONT	CA	945383838	\$14.25	8/18/2007
BILCHIK, GLORIA	CREVE COEUR	MO	831417729	\$58.80	8/22/2007
EDWARDS, SANDRA	FREMONT	CA	945383838	\$13.30	10/4/2007

Non-Traditional Donation (NTD) – This is a contribution that is a whole dollar amount but is not a multiple of \$5.00. Examples:

CONTRIBUTOR NAME	CITY	STATE	ZIP	AMOUNT	DATE
LOUI, RONALD	SAINT LOUIS	MO	631303807	\$31.00	11/30/2007
HANSON, HEATHER	WILLISTON	VT	054857188	\$24.00	12/18/2007
WELCH, DAVID	NEW YORK	NY	10008	\$7.00	12/31/2007
THRALL, LAURA	CHICAGO	IL	80810	\$88.00	1/8/2008
ROWLAND, JOSHUA	KANSAS CITY	MO	641131337	\$301.00	1/8/2008

Traditional Donation (TD) – This is a contribution that is a whole dollar amount that is a multiple of \$5.00. Examples:

CONTRIBUTOR NAME	CITY	STATE	ZIP	AMOUNT	DATE
WHITE, AMY	ARLINGTON	VA	722074028	\$100.00	8/18/2008
WICKLUND, PAUL	WAYZATA	MN	553912028	\$50.00	8/18/2008
WILLIAMS, CAROLYN	EARRINGTON	RI	028084904	\$5.00	8/18/2008
WILLIAMSON, MICHAEL	LOWELL	MA	018543208	\$25.00	8/18/2008

Multiple Day Donations (MDD) – This is a pattern where a donor has more than one donation on the same day. These donations can be the same amount or different amounts. Example:

CONTRIBUTOR NAME	CITY	STATE	ZIP	AMOUNT	DATE
BERGERON, TOM	OLD GREENWICH	CT	068701018	\$25.00	2/7/2008
BERGERON, TOM	OLD GREENWICH	CT	068701018	\$25.00	2/7/2008
BERGERON, TOM	OLD GREENWICH	CT	068701018	\$50.00	2/7/2008
BERGERON, TOM	OLD GREENWICH	CT	068701018	\$50.00	2/7/2008
BERGERON, TOM	OLD GREENWICH	CT	068701018	\$100.00	2/7/2008

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BERGERON, TOM	OLD GREENWICH	CT	068701018	\$100.00	2/7/2008
BERGERON, TOM	OLD GREENWICH	CT	068701018	\$100.00	2/7/2008
BERGERON, TOM	OLD GREENWICH	CT	068701018	\$200.00	2/7/2008
BERGERON, TOM	OLD GREENWICH	CT	068701018	\$100.00	2/7/2008
BERGERON, TOM	OLD GREENWICH	CT	068701018	\$1,000.00	2/23/2008

Duplicate Donations (DD) – This is a sub pattern of the MDD, where the donor made two contributions of the same amount on the same day. Examples:

CONTRIBUTOR NAME	CITY	STATE	ZIP	AMOUNT	DATE
SPIELMAN, MICHELLE	SAN DIEGO	CA	92118	300.00	2/10/2007
SPIELMAN, MICHELLE	SAN DIEGO	CA	92118	300.00	2/10/2007
JOHNSON, STANLEY	BUFFALO GROVE	IL	600896658	1,000.00	2/12/2007
JOHNSON, STANLEY	BUFFALO GROVE	IL	600896652	1,000.00	2/12/2007
IRVINE, CANDY	KAILUA	HI	967344058	50.00	2/17/2007
IRVINE, CANDY	KAILUA	HI	967344058	50.00	2/17/2007
WOOTAN, PATRICIA	KINGSTON	NY	124015134	12.00	2/30/2007
WOOTAN, PATRICIA	KINGSTON	NY	124015134	12.00	2/30/2007
MUNOZ, ZARAGOZA	HOUSTON	TX	77008	178.95	5/28/2007
MUNOZ, ZARAGOZA	HOUSTON	TX	77008	178.95	5/28/2007
MORSE, PATRICIA	LAWRENCEBURG	KY	403421517	30.80	6/18/2007
MORSE, PATRICIA	LAWRENCEBURG	KY	403421517	30.80	6/18/2007

Coupled Donations (CD) – This is another sub pattern of the MDD, where the donor made two contributions on the same day. One of the contributions was a Non-Dollar Donation and the second was either a Non-Traditional Donation or a Traditional Donation. Examples:

CONTRIBUTOR NAME	CITY	STATE	ZIP	AMOUNT	DATE
BAILLIE, MARK	BROOKLYN	NY	11231	\$52.45	2/10/2007
BAILLIE, MARK	BROOKLYN	NY	11231	\$200.00	2/10/2007
BALTUCH, LORI	SIOUX FALLS	SD	571890001	\$55.13	2/10/2007
BALTUCH, LORI	SIOUX FALLS	SD	571890001	\$100.00	2/10/2007
BEAVERS, JOHN	PAEONIAN SPRINGS	VA	201291808	\$10.05	2/10/2007
BEAVERS, JOHN	PAEONIAN SPRINGS	VA	201291808	\$252.00	2/10/2007
BHATTI, MARYAM	CROFTON	MD	211143170	\$15.05	2/10/2007
BHATTI, MARYAM	CROFTON	MD	211143170	\$50.00	2/10/2007
BIBBER, MARTHA	PHOENIX	AZ	85044	\$30.13	2/10/2007
BIBBER, MARTHA	PHOENIX	AZ	85044	\$1,000.00	2/10/2007

When I began my research, the first thing I noticed was the large number of Non-Dollar Donations (NDD) for the OFAC. While I do not understand why someone would donate such an amount, I am sure some individuals might do so. The McCain campaign had 824 such Non-Dollar Donations for their entire presidential campaign. The OFAC had 144,393 NDDs. While I was summing the Non-Dollar Donations by date, I found there were groupings of these NDDs with the same amounts on certain dates. I have listed these in electronic Exhibit SP. The dates and number of specific NDDs and NTDs, where the number of these similar contributions was greater than 10 on a given day, are included in Exhibit SP. The occurrence of NDD and NTD contributions per day

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averaged 0 to 2. The fact that 10 or more identical amounts being donated on a single day seems highly unusual. The fact that several different NDDs and NTDs were donated on the same day in large amounts seems even more improbable. It didn't make sense to me for 10 or more people from different parts of the country to be making the same unknown donation amounts on the same day. Some of these contribution amounts show a defined single peak of activity. I refer to this phenomenon as singularity. The most defined example of this is for the NDD contribution of \$5.01. On February 12, 2008, 393 contributions were made in this amount. Exhibit C0 shows the graph of the \$5.01 contributions and this example of singularity.

Another pattern that seems very artificial to me is demonstrated in Exhibits C1, C2, C3, C4, and C5. These exhibits show the contribution amounts \$17.95, \$26.68, \$7.95, \$12.95, and \$14.60 respectively. You can see there is random activity for most of the campaign. The random contribution activity ends abruptly starting on August 31, 2008 through September 30, 2008. In each of these contribution amounts there are only four peaks in roughly the same proportions on the same dates. These days were August 31, September 19, September 28, and September 30, 2008. Unlike the months before, there are no other dates that have any donations recorded during this period. This is the time period when the OFAC received more than 150 million dollars in donations. There are other examples among the NDD amounts that follow this same pattern. A more complete catalog of graphs for various donation amounts can be found in electronic Exhibit SQ.

An additional irregularity concerning the NDDs was the fact that in many instances these contributions were made on the same day as a Traditional Donation. I refer to such donations as a Coupled Donation (CD). People tend to do things in the most economical manner with respect to time. If you were going to donate a certain amount of money to a campaign, you would normally just donate a single amount no matter what that amount might be. People just don't donate an amount and turn right around and donate another amount. When the total number of coupled donations per day is graphed chronologically, we find a large peak of Coupled Donations on September 30, 2008. This graph appears in Exhibit D. This total number is so out of proportion with the other days of the campaign that this has to have an external source. I find it highly unlikely that so many people would make coupled donations on the same day as is shown in the contribution filings. I considered the possibility that these contributions were posted on the last day of the month even if they were donated earlier. This action, if conscious, would be a violation of Federal law as the donations are to be recorded on the day they are received.

Another interesting pattern I found was two or more NDDs of the same amount being made on the same day. When you plot the number of these instances of duplicate NDDs versus time you find another out of scale peak on September 18, 2008. This graph appears in Exhibit E. Again, this can't be attributed to random donations with donors across the country. The fact that duplicate Non-Dollar Donations were being made by 988 donors on the same day is almost statistically impossible assuming random donations.

Another unusual pattern that I observed occurred during the time span of June 30, 2008 to September 31, 2008. I found examples where two NDD or NTD contributions exactly added up to some whole Traditional Donation amount. The pairs that added up to \$2,300 first caught my eye. I recorded 89 instances where two NDD or NTD contributions were made on the same day that always added up to the contribution limit of \$2,300. Another interesting link between all of these donations is that in the notes field it references the Obama Victory Fund. I can't understand why a donor would

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donate two apparently random amounts that add up to the contribution limit. Why not just contribute the single amount of \$2,500 and be done with it? Why does this only occur during the time span of June 30, 2008 to September 31, 2008? None of these amounts are the same but they all add up to \$2,500. Other sum amounts ranged from \$100 to \$1,000. All of these contributions are listed in electronic Exhibit 6L. I have displayed some examples of this pattern in Exhibit 6.

Finally, there are single Non-Dollar Donations (NDDs) that were contributed. When you look at the donor contribution histories, the Non-Dollar Donations obviously appear as being completely out of character for the donor. You will find a donor consistently donating a specific amount, sometimes at a particular time of month and then you find the NDD(s) just randomly thrown in. People are generally creatures of habit and just don't break their patterns this dramatically. The sheer number of these compared to the McCain contributions indicates to me that these are not being randomly donated. These donations are listed in electronic Exhibit 6M.

This particular class of donations I will discuss are the Non-Traditional Donations or NTD. There were certain NTD amounts that to me seem a disproportionate amount of use. In particular the values \$47.00, \$53.00, \$106.00, and \$208.00 seemed to be donated quite often. I don't see any logical reason why these particular amounts would be preferred. These amounts also showed the unusual spikes so prevalent when analyzing the donation data. I have presented the most extreme example of singularity for the NTD amounts with \$47.00 in Exhibit H0. As you can see the average number of \$47.00 donations is rather low and initially very infrequent. On August 4, 2008, 494 donations of \$47.00 were made. This particular peak shows such singularity and is so far above baseline that it cannot be due to random donations. I imagine if the Commission analyzed these 494 donors that very few, if any, of the donors made these contributions. While this was the most distinct example of singularity for NTDs, it was by no means the only one. I have included five more graphs showing the contribution patterns for \$16.00, \$24.00, \$53.00, \$54.00, and \$106.00 in Exhibits H1, H2, H3, H4, and H5. In each of these exhibits singularity is displayed, though not as defined as in the case of the \$47.00 contributions.

Just as in the case of the Non-Dollar Donations, why is there apparent clustering on certain dates? This just doesn't seem to fit what we expect from random voter contributions. Examination of the peaks in the \$24, \$54, and \$106 amounts the common dates were December 11th and 12th and March 17th and 18th. It just doesn't make sense assuming a random voter contributing pattern for such clustering to occur. As I continue to display definitive pictures of what appear non-random contribution patterns I hope this will persuade the Commission to investigate my complaint.

As I alluded to earlier, people tend to do a job as efficiently as possible. That is why I do not understand a donor making two or more contributions on the same day. Yet, I have identified 99,033 instances where MDDs of various patterns have occurred in the filings of the OFAC. I have listed the breakdown of the various MDD groups in Exhibit G with the number of instances of the MDDs, the total number of transactions, and the total amount of the contributions for that pattern. Due to the large number of transactions I have listed them separately in electronic Exhibits 8A, 8B, 8C, 8D, 8E, 8F, 8G, 8H, 8I, 8J, and 8K. These files contain all of the contributions in these different patterns. The different files are named for the patterns listed in Exhibit G. The amounts of the donations made by the individuals on the same day vary greatly. Some are the same amount, some are very different. Some range in amounts from \$5 to \$1,000 on the same day. The number of donations in a single day range from two to as many as one hundred sixty four. The logic in someone doing this totally escapes me and I am

recommending these patterns as one of the groups I have indicated the Commission should verify first.

Finally, we come to the Traditional Donations. The Traditional Donations (TDs) are where the bulk of the recorded donations occurred. Here we can find some unusual patterns. I found that the usual \$10, \$50, and \$100 donations occur quite often and again we find the unusual peaks that appear far outside the range we would expect for random donations. Exhibits I1, I2, and I3 show the numerous peaks for these three contribution amounts. One would expect to see some slight peaks relative to activity during the same time span but many of these peaks are far above the baseline activity. I found that for some reason the \$30.00 donation amount very popular with quite a few peaks far above baseline at several points during the campaign. Actually, the \$30 donation had the 6th, 14th, and 24th highest number of donations for any amount on a given day. For the donation amounts I have reviewed in detail, many of the \$100 contributions are an out of place as the NDDs. The best example of singularity can be found in the Traditional Donations. That honor goes to the \$55.00 donation. On September 30th, 2008, 2799 contributions of \$55.00 were made. The graph in Exhibit J shows the best defined example of singularity I have found so far. It is the number of these single peaks over different contribution amounts that support the suggestion that they are the result of an effort by some unknown party(ies) to donate in other donor's names.

I have worked through the Non-Dollar and Non-Traditional Donations to show patterns that were easily recognizable due to the small number of donations in relation to the total amount received by the UFAC. I have even shown patterns in what should normally be relatively unimportant Traditional Donations. It is only reasonable to assume that these patterns also lie in the common Traditional Donation amounts. Exhibits K1, K2, K3, K4, K5, K6, and K7 graph the donation patterns for the contribution amounts \$25, \$50, \$100, \$250, \$500, \$1,000, and \$2,300 respectively. We can see spikes in activity, but these are a little more difficult to see than in the earlier graphs that have been presented. In the \$2,300, \$1,000, and \$500 graphs, the spikes are very easy to identify. These peaks are far above baseline activity for the time frame in which they occur. The \$2,300 contribution amount has multiple peaks culminating in the two massive spikes on July 31 and September 30, 2008. The smaller contribution amounts listed above have more activity and make for a busier graph. Inspection of the spikes listed when looking at the individual donor histories has shown that there are many questionable transactions within these spikes. If the Commission investigates this complaint and initial verification of illegal contributions comes back positive, I would target these peak dates for further investigation.

It is in these common Traditional Donations where most of the possible illegal donations could be found. Any well defined peak with very little activity preceding or following it would be very suspect. In my examination of individual donor histories, one could easily find out of place TDs. The ones that I identified are listed with the other suspect donations in electronic Exhibit EN. In order to locate these suspect contributions, it would be a tedious examination of all donor contribution histories followed by contact with the donors for verification. While very time consuming, this is the only way I can see to truly check for illegal donations. The only other method would be to cross reference the credit card numbers used. One could suspect most donors would use the same credit card. As I mentioned in the Bishop case earlier, if the AVS was not being properly used as it appears, anyone could make a donation in some one else's name. In the Bishop example, she had not even donated before. Her name would not have appeared in the contribution filings. Yet, someone got her name and address.

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They put down random information for her employer and occupation. There are many examples of apparently random information in these fields. There are also many examples of "Not employed" or "retired". While these are valid descriptions in some cases, they could be used to mask illegal donations. Any group could use the downloaded contributor list from the FEC website and donate at their leisure. If the listed donor was not seeing anything on their credit card statement, as in the Bishop case, there would be no flag to indicate fraud. That is why looking at donations made on peak days would be a good method to search for fraud with the Traditional Donations. The OFAC wouldn't catch them with their "extensive back-end review" as they would appear quite "normal".

Another aspect that I feel needs extensive verification is the foreign donations. The McCain committee only submitted 12 donors who apparently donated from outside the country. This does not include an APO or military or Foreign Post Office address. The OFAC submitted over 4,150 donors, who through searching the Internet for address verification could be traced to a foreign country. I excluded any known US territories such as the Virgin Islands, Guam, and Saipan. While some of the names and occupations indicate these are possible Americans working overseas, many more indicate to me that these are likely foreign nationals. I have listed all of the transactions that I was able to trace to a foreign country in electronic Exhibit SR. There doesn't seem to be any real check that was done by the OFAC except that online donors had to check a box indicating they were US citizens. It would seem to me that more concrete evidence of citizenship would be required such as a passport number or copy of a birth certificate.

We have documented evidence of three foreigners, apparently brothers, who donated to the Obama campaign. These were Mark Edwan, Isaac Edwan, and Oasma Edwan. Pamela Geller brought this to the world's attention with a post on her website on July 30, 2008. See Exhibits M and Q. The OFAC commented publicly that they had refunded all of the money. Later posts indicated that when the brothers were interviewed, they said they had not received any of the money. A summary of the Edwan brother's donations for the initial and amended filings appear in Exhibit L.

When I looked at this specific example, I found something very disturbing to me. The Year End 2007 Initial donation filing made on January 31, 2008 and amended filing on May 15, 2008, showed all three brothers and their donations. Two amended filings for Year End 2007 were made on August 29, 2008 and August 30, 2008. The donation histories of the three Edwan brothers were greatly altered with Oasma Edwan's donations disappearing completely. The missing donations amounted to over \$25,000. These amended filings came several weeks after Ms. Geller's postings and several media inquiries to the OFAC. Even the remaining contributions and reported credit chargebacks didn't have the same information as the original two filings. If the donations were recorded and not modified after the first amended filing in May, why did the original amounts get removed in the two August filings? I would have expected to see the donations with the appropriate refund transactions included. It also surprises me that the OFAC used credit card chargeback in their notes. I somehow doubt the brothers used their MasterCard to charge these donations. Whether this is the only example of diluted donations, I do not know. My research has not looked at diluted donations, but I have noticed refunds to donors that did not have any citations listed.

I believe the improper use of the Address Verification System (AVS) has resulted in many illegal contributions being made in other donor's names. These names and addresses can be easily downloaded from the FEC website just as I have done after each election period required filing has been done. A person could use this information

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to donate using a credit card and if the AVS is disabled the transaction would go through. I fault the OFAC for not making sure all possible controls should be in place. In this light, I have not assumed any direct part in these possible illegal transactions to be placed on the OFAC. However, there is one scenario that I cannot remove the OFAC from possible suspicion. This concerns the group of suspect donations that occurred on February 10, 2007. This day saw a multitude of various donation and donation pattern irregularities. These irregularities included 140 Non-Dollar Donations, 116 Coupled Donations, 2 Multiple Day Donations each including NDDs, 21 Coupled Donations that were either redistributed or redistributed, one Duplicate Donation with a NND, and 6 MDDs with either the same or different Traditional Donations. See electronic Exhibit SS. This day truly represented a cross section of most of the patterns that were observed the entire election. The reason I find this very suspicious is the fact that at the time these donations were made, no election filing for the first quarter of 2007 had been made. No one except the OFAC and the donors themselves had any idea who had contributed. If the donors did not make these suspect donations, then who did? No outside entity would have knowledge that the contributions had even occurred. That leaves the only party who could have made the entry as the OFAC. This is the contribution group that to me is the highest priority for the Commission to verify. If the contributors did not make these donations, we have a major issue in my opinion. This would open up all of the suspicious contributions as being possibly influenced by the OFAC. There are other suspect donations made in the first quarter of 2007, but this day is the most dramatic.

Now that I have presented the initial results of my research for the Commission to consider action, I will offer a series of action should the Commission consider investigating my complaint. I think the order in which the groups of suspect contributions should be investigated is as follows:

1. The Suspect Donations that were made on February 10, 2007. This has the potential to implicate the OFAC directly in illegal donations.
2. Multiple Day Donations starting with the highest number of donations per day down to four. I do not think people would make so many separate donations on a single day and not just make one single donation.
3. Coupled Donations made on September 30, 2006. The spike in activity on this date for this type of donation has to be due to organized activity.
4. Duplicate Non-Dollar Donations on September 18, 2006. Again, the spike in activity on this date for this type of donation has to be due to organized activity.
5. Foreign Donations listed under the Suspended National tab in the Foreign Donors spreadsheet. The OFAC needs to provide passport info and whatever information they used to verify these individuals as Americans working or living abroad.

After verifying these five groups, the Commission will know whether my complaint is valid. If they find a large number of contributions that were not made by the listed individuals or that many of the foreign donations were made by foreign nationals, they should pursue the rest of my listed suspect donations or start a full audit of the OFAC filings. I would also ask that the Commission would at that time request a full itemization of all OFAC contributions. While it is within the law, it greatly disturbs me that \$251,843,152.91 in transactions under \$250 was aggregated without the contributors being listed. This is 38% of the entire OFAC contributions. The American people have no idea where this money came from. If the Commission verifies a large number of illegal contributions identified by my research, I feel this donation group will contain even more irregularities. I would like to see full disclosure of this donation group. I

commend the McCain campaign for fully disclosing all of their donations. I wish the law would be changed to enforce this for all candidates.

I realize that the Commission may view this complaint in the light that it will be too resource intensive to pursue. I understand the amount of resources it would take to do what I am suggesting. There are no statutes that I have found, as I said earlier, that requires a committee to insure the authenticity of a donation before it is accepted. In this case no law has been broken. With 32% of the OFAC's contribution coming from undisclosed sources, while very troubling to me, is also within the law. Finally, by not accepting public funding, the OFAC has removed itself from the automatic audit that is required by law.

Still, I am hoping the Commission will act on this complaint to see if the possible violations I have outlined actually have happened. I do not why the OFAC chose not to take more steps to check all donations that were accepted were valid and made by the listed contributors before depositing them. I am a concerned citizen who believes all of our government officials should hold to the highest standards of integrity, especially those seeking the highest office in the land. The fact that I see so many patterns of irregularities in the OFAC filings highly concerns me. I feel it my duty as an American citizen to at least ask that those with the assigned task of monitoring the election process check for any possible violation of election contribution statutes. If the Commission should decide to pursue my complaint, I will offer my services to supply any further information or explain more fully any of my analytical processes. I await the Commission's decision to pursue my complaint.

I swear the above information to be true to the best of my knowledge and information.

Sincerely,
James R Wilkins

James R Wilkins

Sworn and subscribe to me in Nashville, Tn on September 11, 2009

Layna L Venable Notary Public

My Commission expires on:

Nov 22, 2010



Exhibit M

Page 1 of 6

Secret, Foreign Money Floods Into Obama Campaign
Monday, September 29, 2008 9:23 PM
By: Hannah R. Timmerman

More than half of the whopping \$428.9 million Barack Obama has raised has come from small donors whose names the Obama campaign won't disclose.

And questions have arisen about millions more in foreign donations the Obama campaign has received that apparently have not been vetted as legitimate.

Obama has raised nearly twice as much as John McCain's campaign, according to new campaign finance report.

But because of Obama's high expenses during the hotly contested Democratic primary season and an early decision to forgo public campaign money and the spending limits it imposes, all that cash has not translated into a financial advantage — at least, not yet.

The Obama campaign and the Democratic National Committee began September with \$65 million in cash, according to reports filed with the Federal Election Commission (FEC).

The McCain camp and the Republican National Committee had \$94 million, because of an influx of \$84 million in public money.

But Obama easily could surpass McCain by \$50 million to \$100 million or more in new donations before Election Day, thanks to a legion of small contributors whose names and addresses have been kept secret.

Unlike the McCain campaign, which has made its complete donor database available online, the Obama campaign has not identified donors for nearly half the amount he has raised, according to the Center for Responsive Politics (CRP).

Federal law does not require the campaigns to identify donors who give less than \$200 during the election cycle. However, it does require that campaigns calculate running totals for each donor and report them once they go beyond the \$200 mark.

Surprisingly, the great majority of Obama donors never break the \$200 threshold.

"Contributions that come under \$200 aggregated per person are not listed," said Bob Biersack, a spokesman for the FEC. "They don't appear anywhere, so there's no way of knowing who they are."

The FEC breakdown of the Obama campaign has identified a staggering \$228.7 million as coming from contributions of \$200 or less. Only \$39.6 million of that amount comes from donors the Obama campaign has identified.

It is the largest pool of unidentified money that has ever flooded into the U.S. election system, before or after the McCain-Feingold campaign finance reforms of 2002.

Biersack would not comment on whether the FEC was investigating the huge amount of cash that has come into Obama's coffers with no public reporting.

But Mark Ritak, a spokesman for CRP, a campaign finance watchdog group, dismissed the scale of the unreported money.

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"We feel comfortable that it isn't the \$20 donations that are corrupting a campaign," he told Newmax.

But those small donations have added up to more than \$200 million, all of it from unknown and unreported donors.

Ritsch acknowledges that there is skepticism about all the unreported money, especially in the Obama campaign coffers.

"We and seven other watchdog groups asked both campaigns for more information on small donors," he said. "The Obama campaign never responded," whereas the McCain campaign "makes all its donor information, including the small donors, available online."

The rise of the Internet as a campaign funding tool raises new questions about the adequacy of FEC requirements on disclosure. In pre-Internet fundraising, almost all political donations, even small ones, were made by bank check, leaving a paper trail and limiting the amount of fraud.

But credit cards used to make donations on the Internet have allowed for far more abuse.

"While FEC practice is to do a post-election review of all presidential campaigns, given their sluggish metabolism, results can take three or four years," said Ken Bockm, the chairman of the conservative National Legal and Policy Center.

Already, the FEC has noted unusual patterns in Obama campaign donations among donors who have been disclosed because they have gone beyond the \$200 minimum.

FEC and Mr. Good Will

When FEC auditors have questions about contributions, they send letters to the campaign's finance committee requesting additional information, such as the complete address or employment status of the donor.

Many of the FEC letters that Newmax reviewed instructed the Obama campaign to "re designate" contributions in excess of the finance limits.

Under campaign finance laws, an individual can donate \$2,300 to a candidate for federal office in both the primary and general election, for a total of \$4,600. If a donor has topped the limit in the primary, the campaign can "re designate" the contribution to the general election on its books.

In a letter dated June 25, 2008, the FEC asked the Obama campaign to verify a series of \$25 donations from a subscriber identified as "Mr. Good" from Arizona Times.

Mr. Good Will listed his employer as "Lansing" and his profession as "You."

A Newmax analysis of the 1.4 million individual contributions in the latest master file for the Obama campaign discovered 1,000 separate entries for Mr. Good Will, most of them for \$25.

In total, Mr. Good Will gave \$17,375.

Following this and subsequent FEC requests, campaign records show that 330 contributions from Mr. Good Will were credited back to a credit card. But the most recent report, filed on Sept. 20, showed a net cumulative balance of \$9,950 — still well over the \$4,600 limit.

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There can be no doubt that the Obama campaign noticed these contributions, since Obama's Sept. 20 report specified that Mr. Doodad's cumulative contributions since the beginning of the campaign were \$9,375.

In an e-mailed response to a query from Newsmag, Obama campaign spokesman Ben LaBolt pledged that the campaign would return the donations. But given the slowness with which the campaign has responded to earlier FEC queries, there's no guarantee that the money will be returned before the Nov. 4 election.

Similarly, a donor identified as "Pro, Doodad," from "Nando, NY," gave \$19,500 in 786 separate donations, most of them for \$25. For most of these donations, Mr. Doodad Pro listed his employer as "Loving" and his profession as "Ymm," just as Grand Will had done.

But in some of them, he didn't even go this far, apparently picking letters at random to fill in the blanks on the credit card donation form. In these cases, he said he was employed by "VCX" and that his profession was "VCVC."

Following FEC requests, the Obama campaign began refunding money to Doodad Pro in February 2008. In all, about \$8,425 was charged back to a credit card. But that still left a net total of \$11,165 as of Sept. 20, way over the individual limit of \$4,600.

Here again, LaBolt pledges that the contributions would be returned but gives no date.

In February, after just 93 donations, Doodad Pro had already gone over the \$2,300 limit for the primary. He was over the \$4,600 limit for the general election one month later.

In response to FEC complaints, the Obama campaign began refunding money to Doodad Pro even before he reached these limits. But his credit card was the gift that kept on giving. His most recent un-refunded contributions were on July 7, when he made 14 separate donations, apparently by credit card, of \$25 each.

Just as with Mr. Good Will, there can be no doubt that the Obama campaign noticed the contributions, since its Sept. 20 report specified that Doodad's cumulative contributions since the beginning of the campaign were \$10,965.

Foreign Donations

And then there are the overseas donations — at least, the ones that we know about.

The FEC has compiled a separate database of potentially questionable overseas donations that contains more than 11,600 contributions totaling \$3.38 million. More than 520 listed their "state" as "IR," which the FEC often uses as an abbreviation for "information requested." Another 63 listed it as "UK," the United Kingdom.

More than 1,400 of the overseas entries clearly were U.S. diplomats or military personnel, who gave an APO address overseas. Their total contributions came to just \$201,690.

But others came from places as far afield as Abu Dhabi, Addis Ababa, Beijing, Fallujah, Florence, Italy, and a wide selection of towns and cities in France.

Until recently, the Obama Web site allowed a contributor to select the country where he resided from the entire membership of the United Nations, including such friendly places as North Korea and the Islamic Republic of Iran.

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Unlike McCain's or Sen. Hillary Clinton's online donation pages, the Obama site did not ask for proof of citizenship until just recently. Clinton's presidential campaign required U.S. citizens living abroad to actually fax a copy of their passport before donation would be accepted.

With such lax vetting of foreign contributions, the Obama campaign may have indirectly contributed to questionable fundraising by foreigners.

In July and August, the head of the Nigeria's stock market held a series of pro-Obama fundraisers in Lagos, Nigeria's largest city. The events attracted local Nigerian business owners.

At one event, a table for eight at one fundraising dinner went for \$16,950. Nigerian press reports claimed sponsors raked in an estimated \$800,000.

The sponsors said the fundraisers were held to help Nigerians attend the Democratic convention in Denver. But the Nigerian press expressed skepticism of that claim, and the Nigerian public anti-fraud commission is now investigating the matter.

Concerns about foreign fundraising have been raised by other anecdotal accounts of illegal activities.

In June, Libyan leader Moammar Gadhafi gave a public speech praising Obama, claiming foreign nationals were donating to his campaign.

"All the people in the Arab and Islamic world and in Africa applauded this man," the Libyan leader said. "They welcomed him and prayed for him and for his success, and they may have even been involved in legitimate contribution campaigns to enable him to win the American presidency..."

Though Gadhafi asserted that fundraising from Arab and African nations were "legitimate," the fact is that U.S. federal law bans any foreigner from donating to a U.S. election campaign.

The rise of the Internet and use of credit cards have made it easier for foreign nationals to donate to American campaigns, especially if they claim their donation is less than \$250.

Campaign spokesman LaBolt cited several measures that the campaign has adopted to "root out fraud," including a requirement that anyone attending an Obama fundraising event overseas present a valid U.S. passport, and a new requirement that overseas contributors must provide a passport number when donating online.

One new measure that might not appear obvious at first could be frustrating to foreigners wanting to buy campaign paraphernalia such as T-shirts or bumper stickers through the online store.

In response to an investigation conducted by blogger Pamela Geller, who runs the blog Atlas Shrugs, the Obama campaign has locked down the store.

Geller first revealed on July 21 that donors from the Gaza strip had contributed \$23,080 to the Obama campaign through bulk purchases of T-shirts they had shipped to Gaza.

The online campaign store allows buyers to complete their purchases by making an additional donation to the Obama campaign.

A pair of Palestinian brothers named Hossam and Nizar Elwan contributed more than \$51,300 to the Obama campaign in October and November 2007, FBI records show.

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Their largesse attracted the attention of the FEC almost immediately. In an April 15, 2008, report that examined the Obama campaign's year-end figures for 2007, the FEC asked that some of these contributions be reassigned.

The Obama camp complied sluggishly, prompting a more detailed admonishment from the FEC on July 30.

The Edwan brothers listed their address as "GA," as in Georgia, although they entered "Gaza" or "Rafah Refugee camp" as their city of residence on most of the online contribution forms.

According to the Obama campaign, they wrongly identified themselves as U.S. citizens, with a voluntary check-off box at the time the donations were made.

Many of the Edwan brothers' contributions have been purged from the FEC database, but they still can be found in archived versions available for CRP and other watchdog groups.

The latest Obama campaign filing shows that \$891.11 still has not been refunded to the Edwan brothers, despite repeated FEC warnings and campaign claims that all the money was refunded in December.

A Newsmax review of the Obama campaign finance filings found that the FEC had asked for the reassignment or refund of 58,538 donations, totaling just under \$38 million.

But none involves the donations that never appear in the Obama campaign reports, which the CRP estimates at nearly half the \$426.8 million the Obama campaign has raised to date.

Many of the small donors participated in online "matching" programs, which allows them to hook up with other Obama supporters and eventually share e-mail addresses and blogs.

The Obama Web site described the matching contribution program as similar to a public radio fundraising drive.

"Our goal is to bring 50,000 new donors into our movement by Friday at midnight," campaign manager David Plouffe e-mailed supporters on Aug. 14. "And if you make your first online donation today, your gift will go twice as far. A previous donor has promised to match every dollar you donate."

FEC spokesman Bleasack said he was unfamiliar with the matching donation drive. But he said that if donations from another donor were going to be reassigned to a new donor, as the campaign suggested, "the two people must agree" to do so.

This type of matching drive probably would be legal as long as the matching donor had not exceeded the \$2,300 per-election limit, he said.

Obama campaign spokesman LaBolt said, "We have more than 2.5 million donors overall, hundreds of thousands of which have participated in this program."

Until now, the names of these donors and where they live have remained anonymous — and the federal watchdog agency in charge of ensuring that the presidential campaigns play by the same rules has no tools to find out.

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CLARIFICATION

The original version of this story, published on this Web site Sept. 29, reported that the "IR" listed on 529 overseas donations is "often an abbreviation for Iran."

However, FEC spokesman Bob Biersack said Oct. 7 that "IR" generally means "information requested," not Iran. "That's often, but not always, what it means," he said.

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Obama's Secret Campaign Cash: Has \$63 Million Flowed from Foreign Sources?
Sunday, October 19, 2008 @ 28 PM
By: Kenneth R. Tammerman

As Barack Obama reaped a stunning \$150 million in campaign donations in September, bringing his total to more than \$800 million, new questions have arisen about the source of his amazing funding.

By Obama's own admission, more than half of his contributions have come from small donors giving \$200 or less. But unlike John McCain's campaign, Obama won't release the names of these donors.

A Newmax analysis of disclosed Obama campaign donors shows worrisome anomalies, including outright violations of federal election laws.

For example, Obama has numerous donors who have contributed well over the \$4,600 federal election limit.

Many of these donors have never been contacted by the Obama campaign to refund the excess amounts to them.

And more than 87,000 Obama donations appear to be conversions of foreign currency.

According to a Newmax analysis of the Obama campaign data before the latest figures were released, potential foreign currency donations could range anywhere from \$12.8 million to a stunning \$63 million in all. With the addition of \$150 million raised in September, this amount could be much more.

When asked by Newmax about excess contributions, Obama spokesman Ben LaBolt said that contributions already notified as excess had been returned and that those the campaign was just learning about -- either through news accounts or from the Federal Election Commission -- "will be returned."

"Every campaign faces the challenge of assessing and reviewing its contributions," LaBolt said. "And we have been aggressive about taking every available step to make sure our contributions are appropriate, updating our systems when necessary."

But many of the donors Newmax canvassed said they had "never" been contacted by the Obama campaign or seen any refunds, even though their contributions went over the limit months ago.

In all, Newmax found more than 2,000 donors who had contributed in excess of the \$4,600 limit for individuals per election cycle.

Such donations, if not returned within 60 days, are a clear violation of federal campaign finance laws.

Lisa Handley, a stay-at-home mom from Portland, Ore., recalled giving \$4,600 to the Obama campaign by credit card, contributions she made because "I love Obama," she said.

According to FEC records, however, she gave an additional \$2,300 to the campaign, putting her over the limit.

The Obama campaign reports that it had "reassigned" the excess money, which could mean that it had contributed it to a separate party committee or a joint fundraising committee, which have higher limits.

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But if that happened, it's news to Handley. "No one ever contacted me to return any of the money or told me they were refunding some of the money," she said.

Ronald J. Sharpe Jr., a retired teacher from Rockledge, Fla., appears in the Obama campaign reports as having given a whopping \$13,880.

The campaign reported that it returned \$4,600 to him, making his net contribution of \$9,280 still way over the legal limit.

But there's one problem with the Obama data: Sharpe doesn't remember giving that much money to the Obama campaign in the first place, nor does he recall anyone from the campaign ever contacting him to return money.

"At the end, I was making monthly payments," he told Newmax. The Obama campaign records do not show any such payments.

Many donors refused to answer questions about the political campaign contributions appearing in their name when they learned that the caller was from a news organization.

John Addison, an insurance agent in Burr Ridge, Ill., refused to discuss his contributions, which totaled \$8,728.02, before numerous requests.

Addison and others gave in odd amounts: \$188.87, \$1,542.08, \$128.02, \$388.87, \$282.20, \$195.88, \$118.15, and one rounded contribution of \$2,300.

Sandra Daneshinia, a self-employed caregiver from Los Angeles, made 38 separate contributions, totaling \$7,051.12, according to FEC records. Thirteen of them were eventually refunded.

In a bizarre coincidence, those 13 refunded contributions — for varying amounts such as \$223.88 and \$201.44 — add up exactly to \$2,300, the amount an individual may give per federal election.

Also giving in odd amounts was Robert Porter, an accountant for the town of Oviedo, Fla. Porter gave a surprising \$4,788.02 to the Obama campaign.

In all, Newmax found an astonishing 37,285 unique donors to the Obama campaign whose contributions were not rounded up to dollar amounts. That amounts to more than 10 percent of the total number of unique donors whose names have been disclosed by the Obama campaign to the public.

Of those, 44,410 contributions came in unrounded amounts of less than \$100. FEC regulations only require that campaigns disclose the names of donors who have given a total of \$200 or more, so that means that all these contributors were repeat donors.

Another 15,289 contributions gave in unrounded amounts between \$101 and \$999, while 704 of the unrounded contributions were in amounts of more than \$1,000.

Campaign finance experts find the frequent appearance of unrounded contributions suspicious, since contributors almost invariably give in whole dollar amounts.

One expert in campaign finance irregularities offers a possible explanation.

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"Of course this is odd. They are obviously converting from local currency to U.S. dollars," said Ken Boehm, the chairman of the National Legal and Policy Center.

"The overwhelming number of large dollar contributors -- and even small donors -- are in even dollar amounts," he told Newmax. "Anyone who doubts that can go to FEC.gov and look through the campaign contribution data bases. You will not find many uneven numbers."

Boehm said he had rarely seen unrounded contributions in his 30 years as a lawyer doing campaign finance work.

"There's always the odd cat who wants to round up his checkbook, but they are very rare," he said.

Richard E. Hug, a well-known Republican fundraiser in Maryland who who raised hundreds of thousands of dollars for George W. Bush in 2000 and 2004, and spearheaded the successful 2002 gubernatorial race for Bob Ehrlich that brought in a record \$10 million, told Newmax that unrounded contributions were extremely unusual.

"I've never seen this in all my years of raising money for political candidates," he said. "The first thing it suggests is foreign currency transactions -- contributions from foreign donors, which is clearly illegal."

Top Republican fundraiser Steve Robison, who has raised \$65 million for GOP candidates over the past 30 years, told Newmax that such contributions in uneven amounts would be "pretty unusual."

"You might have a rounding process if there was some kind of joint event, but since all appears to be on the internet, it's pretty unusual. At the very least, it would need to be explored."

LaBolt attributed the uneven amounts to the online "Obama store," which sells T-shirts and other campaign items:

"Contributions made to the Obama store often produce totals that are not exact dollar amounts," he said.

But the campaign has never produced any accounting for proceeds from its online store, which virtually shut down several weeks ago after Newmax and news organizations revealed that Palestinians from the Gaza Strip and other foreigners had made large purchases there.

The Republican National Committee has filed a complaint against the Obama campaign for "accepting prohibited contributions from foreign nationals and excessive contributions from individuals," which incorporated reporting from Newmax and other news organizations.

"Their responses to FEC inquiries have often been inadequate and late," RNC general counsel Sean Calmes told Newmax.

The Obama camp claims to have 2.5 million donors total. But until now, they have kept secret the names of the overwhelming majority of these money-givers. According to a Newmax analysis, the Obama campaign finance records contain just 370,446 unique names.

Even accounting for common names such as Robert Taylor or Michael Brown, which can signify multiple donors, Obama's publicly known donor base is less than 20 percent of the total number of donors the campaign claims to have attracted. But the identity of the other 2 million donors is being kept secret.

As of the end of August, these secret donors have given an incredible \$222.7 million to Obama, according to the FEC -- money whose origin remains unknown to anyone other than Obama's finance team, who won't take calls from the press.

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Exhibit O

Page 1 of 4

Obama Ignores Credit Card Donation Fraud
Tuesday, October 21, 2008 10:41 PM
By: Kenneth R. Timmerman

What do Bart Simpson, Family Guy, Daffy Duck, King Kong, O.J. Simpson, and Raela Odiga have in common?

All are celebrities; and with the exception of Odiga and O.J. Simpson, they also are fictional characters. And yet, all of them gave money earlier this month to the campaign of Barack Obama, without any apparent effect by the campaign to screen them (not as suspect donors).

The Obama campaign's lax security measures are in part a relaxation of standard online merchant security practices, which has allowed illegal donations from foreign donors and from unknown individuals using anonymous "gift" cards. Industry analysts and a confidential informant tell Newmax.

An ongoing Newmax investigation into the Obama campaign's finance reports has exposed multiple instances of campaign finance violations and has been cited in a formal complaint to the Federal Election Commission filed by the Republican National Committee on Oct. 6.

Though many of the known violations include donations in excess of the \$2,000 per election limit on individual contributions and contributions from foreign nationals, the extent of the amount of fraud is hidden because of a loophole in federal election law.

Campaigns are not required to disclose contributors who donate less than \$200 — and Obama's campaign refuses to release their names, addresses, and donation amounts. Obama has collected a staggering \$803.2 million. Most of the money — \$543.3 million — has come from individual contributors, half of it from "small" donors Obama won't disclose.

The Obama campaign has turned a blind eye to the possibility of donor fraud. Reportedly, during the heated primary battle with Hillary Clinton, the Obama campaign "turned off" many online security features on its online donor page, allowing any person with a valid credit card number to donate using any name or address.

Typically, card merchants require a cardholder's name to match critical personal details, such as an address or, at the least, a ZIP code.

Though in recent months the Obama campaign has tightened up security and restored some of the security features used by merchants to weed out fraud, it still has left open easy ways for potential credit card fraud, including techniques similar to those employed by taxicab and drug traffickers to launder illicit funds.

For example, on Oct. 14, an individual using the name "O.J. Simpson" participated in Obama's latest small-donor fundraising drive, making a \$5 donation through the campaign's Web site.

Giving a Los Angeles address, he listed his employer as the "State of Nevada" and his occupation as "convict." The donor used a disposable "gift" credit card to make the donation.

The Obama campaign sent O.J. a thank-you note confirming his contribution, and gave him the name of another donor who had agreed to "match" his contribution.

Four minutes earlier, an individual using the name "Raela Odiga" also made a \$5 contribution, using the same credit card.

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The real Raela Odinga became prime minister of Kenya in April and has claimed to be a cousin of Obama's through a maternal uncle.

Obama donor "Raela Odinga" listed his address as "2007 Stolen Election Passage" in "Nairobi, KY." This credit card donation raised no alarm bells in the Obama campaign.

A few minutes earlier, "Daffy Duck" gave \$5 to the Obama matching campaign, listing his address as "124 Wacky Way, Beverly Hills, Calif."

But just as with Odinga's address, the "Wacky Way" address failed to raise any alarm bells or security traps on the Obama Web site. Daffy Duck also used the same credit card.

Within the hour, three other new donors gave \$5 to the Obama campaign. They were:

- L Bart Simpson, of 333 Hemmens Gate, Bandy Hills, Calif.
- L Family Guy, of 125 KithsJews Alley, Gaza, GA.
- L King Kong, of 549 Quinn Street, Capitol Heights, Md.

Newsmag learned of these contributions, which were all made on a single \$25 Visa gift card (oddly, the total was \$30), from a source that requested anonymity.

Calling himself "Bart Simpson," the tipster said he had been following the Newsmag investigation of Obama's campaign finance irregularities "with great interest," and believed that some of the small donations were coming from gift cards — "you know, the type of disposable debit card you can pick up at Rite-Aid or just about any supermarket."

[Editor's Note: See "Obama Campaign Runs Afoul of Finance Rules."]

"I tried it myself a few days ago," he said. "I'm attaching for you proof of the contributions I made in the names of Daffy Duck, Bart Simpson, Raela Odinga, and Family Guy."

"What this means is that the Obama campaign does no verification of the name of the contributor. With a normal credit card, this wouldn't wor[k], but with these disposable debit cards, no problem!"

"This needs to be exposed," he said.

The tipster attached the confirmation pages from the Obama Web site showing the names of the donors, and in some cases, the names of other Obama donors who had agreed to "match" their contributions.

None of the matching donors' names appears in the Obama campaign's public disclosures to the FEC.

Other donors with clearly fictitious names revealed previously by Newsmag, The Los Angeles Times, and blogger Pamela Geller (aka Shamus) include "Grandpa Furry," "Mong Kong," "Fomen IMA," and "John Hbkjb."

Five major companies process the bulk of all credit card transactions made in the United States, industry insiders tell Newsmag. The Obama campaign paid one of them, Chase Paymentech, just over \$2 million to process all online transactions.

"We never discuss our relationships with any of our merchants, or customers we work with," James Wester, a spokesman for Chase Paymentech, told Newsmag.

Newsmag asked whether Chase Paymentech had any security safeguards in place to identify individuals making contributions using gift cards, but Wester declined to comment.

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But other industry analysts, who asked not to be identified by name because of the sensitive nature of the issue, told Newmax that processors could track gift cards and debit cards fairly by the numbers and the cards.

"There are no names associated with these cards, so as a processor, you have no way of knowing who made the transaction," one industry analyst said.

Anyone can go into a supermarket or a Rite-Aid and buy a batch of these cards with cash, so there is no trace of the transaction, he added.

"It's like walk-around money. They could be handing these things out as perks" to newly registered voters or others, "and there's no way of tracing who is using them."

Kris Boehm, a lawyer with 30 years of experience in campaign finance law, said that such contributions were clearly illegal.

"Making a contribution in the name of another person is the only part of federal election law that actually carries a criminal penalty," he told Newmax. Boehm is the CEO of the National Legal and Policy Center, a conservative think tank in Washington, D.C.

The Obama campaign has paid Synetech Group Inc. of Charlottesville, Va., close to \$1 million to compile all of the campaign contribution data from online contributors, bundlers, telemarketers, campaign events, and direct-mail campaigns, and process it for submission to the FEC.

The sheer scope of the Obama fundraising juggernaut was "never contemplated by the FEC," a company official told Newmax, asking not to be quoted by name.

"It's a lot of data. You're talking 7 million contributions," he said.

The campaign itself is responsible for screening out fraudulent donors, not Synetech, he said. "I've been doing this for 30 years, and this is as well-managed as any [campaign]. It's just huge. When it's this big, any little thing becomes something more than it is."

One of the biggest problems the campaign faces is fraud, he said. "More serious problems. They're paying the campaign with other people's money."

Individuals such as "Doodad Pro" and "Good Will" who made hundreds of contributions to the campaign in excess of the legal limits were not working for the campaign, but for themselves, he insisted.

"It's all fraud. They do it for money. Or they're using the cards. The campaign doesn't want this. Why on earth do they want to have all these messy little transactions? It's a colossal pain."

However, the campaign itself has solicited these "messy little transactions" in numerous e-mails to supporters.

For instance, just days before the Democratic National Convention in Denver, campaign manager David Plouffe sent an e-mail to supporters, asking them to "make a donation of \$5 or more before midnight this Thursday, July 31st, and you could go backstage with Barack."

Since then, the campaign has run several small donation drives, claiming to "match" donations of \$5, \$10, or \$25 with an equal amount for a previous donor.

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Newmax put a series of questions to the Obama campaign more than a week ago in preparation for this article, such as whether its internet contribution system automatically matches donors' names and addresses to their credit card numbers, as is common industry practice with online stores.

Newmax also asked if the campaign uses a similar security screen to match a donor's name and address to the card number when the donor uses a debit card or a gift card.

Despite multiple requests from Newmax, the Obama campaign declined to comment for this story.

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13044324677

Obama Accepting Untraceable Donations
Contributions Reviewed After Deposits
By Matthew Mosk
 Washington Post Staff Writer
 Wednesday, October 29, 2008; Page A02

Sen. Barack Obama's presidential campaign is allowing donors to use largely untraceable prepaid credit cards that could potentially be used to evade limits on how much an individual is legally allowed to give or to mask a contributor's identity, campaign officials confirmed.

Faced with a huge influx of donations over the Internet, the campaign has also chosen not to use basic security measures to prevent potentially illegal or anonymous contributions from flowing into its accounts, aides acknowledged. Instead, the campaign is scrutinizing its books for improper donations after the money has been deposited.

The Obama organization said its extensive review has ensured that the campaign has refunded any improper contributions, and noted that Federal Election Commission rules do not require front-end screening of donations.

In recent weeks, questionable contributions have created headaches for Obama's accounting team as it has tried to explain why campaign finance filings have included itemized donations from individuals using fake names, such as Es Esh or Doodad Pro. Those revelations prompted conservative bloggers to further test Obama's finance vetting by giving money using the kind of prepaid cards that can be bought at a drugstore and cannot be traced to a donor.

The problem with such cards, campaign finance lawyers said, is that they make it impossible to tell whether foreign nationals, donors who have evaded the limits, government contractors or others who are barred from giving to a federal campaign are making contributions.

"They have opened the floodgates to all this money coming in," said Sean Clarron, chief counsel to the Republican National Committee. "I think they've made the determination that whatever money they have to refund on the back end doesn't outweigh the benefit of taking all this money upfront."

The Obama campaign first shuttered presidential fundraising events, in part by switching on the nose of online giving. Within 18 months the senator from Illinois raised \$160 million, mostly \$100 million came in over the Internet.

Lawyers for the Obama operation said yesterday that their "extensive back-end review" has carefully scrubbed contributions to prevent illegal money from entering the operation's war chest. "I'm pretty sure if I took my error rate and matched it against any other campaign or comparable nonprofit, you'd find we're doing very well," said Robert Bauer, a lawyer for the campaign. "I have not seen the McCain compliance staff ascending to heaven on a cloud."

The Obama team's disclosures came in response to questions from The Washington Post about the case of Mary T. Blain, a retired insurance manager from Marshfield, Mo., who turned up on Obama's FEC reports as having donated \$174,000 to the campaign. Contributors are limited to giving \$2,500 for the general election.

Blain, who had scores of Obama contributions attributed to her, said in an interview that she never donated to the candidate. "That's an error," she said. Moreover, she added, her credit card was never billed for the donations, meaning someone appropriated her name and made the contributions with another card.

When asked whether the campaign takes steps to verify whether a donor's name matches the name on the credit card used to make a payment, Obama's campaign replied in an e-mail: "Name-matching is not a standard check conducted or made available in the event card processing industry. We believe Visa and MasterCard do not even have the ability to do this."

"Instead, the campaign does a rigorous comprehensive analysis of online contributions on the back end of the transaction to determine whether a contribution is legitimate."

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Exhibit Q

Page 1 of 5

http://atlashrugs2000.typepad.com/atlas_shrugs/obamas_foreign_contributions/

Thursday, July 31, 2008

Obama's Contributors: Good Will? Loving you? UPDATE: Doo da DooDa

Colour me happy. If this contributor don't beat all - yeah, maybe even Gaza and Dimoka. Good Will - employer Loving you (download file here: [Download GoodWillDetail.xls](#)) gave \$10,450 to Obama's Presidential race (committee number C00431645) and wins with all the metrics? Over 900..... CLICK BELOW TO VIEW THEM ALL (at the Cathy!)

UPDATE: The clown's (contributor) name is PRO, DOODAD (Pro is the last name). Here's the file: [Download DoodadDetail.xls](#) (Hat tip Cathy - she's the bomb)

The # of transactions = 1,044

The \$ contributed = \$10,780.00

This Doodad character works for FDGFDGF and occupation is DFGFDG

ALSO works for LOVING and occupation is YOU ALSO works for VCX and occupation is VCVC

UPDATE Deb sent me this radio clip comes from the 30 July 2008 BTR broadcast of NO WE WONT PUMA radio -- between the 50-60 minute mark. Speakers are Riverdaughter (asking for info) and Nancy A (answering). Listen here: [Download 20080730](#)

Listened to the NO WE WONT (the PUMAs) BTR radio show last night, and they interviewed Mary A. (No Quillier writer) about Obama's connections to ACHSEN. Very damning stuff, and she is continuing to research it.

The particular thing I want to mention to you is someone asked Mary A. about the bundling of contributions. Mary A. discussed this for a few minutes, but she did not say anything was proven, but it is being looked into. The rumor is someone was at an Obama headquarters (not sure where), and observed a series of homeless people going into the headquarters and emerging later and heading straight for a public library. The suspicion is these homeless people are being given \$80 ATM cards and instructed to donate \$40 each to Obama's campaign USING A REMOTE (IMPROVED TO TIE), and then allowed to keep \$40 of the money for themselves. This people looking into it are connecting the activity with several small donations having made under the same name as the scenario. This sounds like what you're looking into with the overseas contributions.

Posted by Ramona Bell on Thursday, July 31, 2008 at 05:04 PM in [Obama's Contributions: Foreign and Domestic](#) | [Permalink](#) | [Comments \(6\)](#) | [TrackBack \(0\)](#)

Obama. Who is Dr. Okechukwu Dimoka?

I attempted to call the good doctor Okechukwu Dimoka in both Salisbury and 500 Academy Street South Asheville, NC 27910 North Carolina to ask him about his complicated election donations. There is no such person. Thanks to Cathy who has been discovering all of these "irregularities". Check out the good doctor's donation history: Click here for entire, whacky history: [Download DimokaDetail.xls](#)

Continue reading "Obama. Who is Dr. Okechukwu Dimoka?" »

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Posted by Pamela Geller on Thursday, July 31, 2008 at 03:26 PM in [Obama's Contributions: Foreign and Domestic](#) | [Permalink](#) | [Comments \(5\)](#) | [TrackBack \(0\)](#)

Obama's Gazan Contributions

UPDATED: CAN READ READ THIS ADDRESS?

[TO REPORTS INDEX](#) [NEW SEARCH](#) [NEW ADVANCED SEARCH](#)

SCHEDULE A (FEC Form 3P) ITEMIZED RECEIPTS

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

FOR LINE NUMBER: PAGE 683/304X
(check only one)

<input type="checkbox"/> 16	<input type="checkbox"/> 17a	<input type="checkbox"/> 17b	<input type="checkbox"/> 17c	<input type="checkbox"/> 17d	<input type="checkbox"/> 11
<input type="checkbox"/> 18	<input type="checkbox"/> 19a	<input type="checkbox"/> 19b	<input type="checkbox"/> 20a	<input type="checkbox"/> 20b	<input type="checkbox"/> 2

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)

Obama for America

Full Name (Last, First, Middle Initial)

Norm Edson

Date of Receipt

Mailing Address

10 / 30 / 2007

Inl section 285/5

City

State

Zip Code

Orish

GA

872

Amount of Each Receipt this Period

FEC ID number of contributing
federal political committee.

856.52

Name of Employer
Accountant

Occupation
Accounting

Receipt For: 2008
Primary ☒ General
Other (specify) ☐

Election Cycle-to-Date ☒

5967.13

Redesignation To

Transaction ID: 639433RPLS

Full Name (Last, First, Middle Initial)

Norm Edson

Date of Receipt

Mailing Address

10 / 27 / 2007

Inl section 285/5

City

State

Zip Code

Orish

GA

872

Amount of Each Receipt this Period

FEC ID number of contributing
federal political committee.

1200.63

Name of Employer
Accountant

Occupation
Accounting

Receipt For: 2008
☒ Primary ☐ General
Other (specify) ☐

Election Cycle-to-Date ☒

5001.54

Redistribution/Redesignation Requested

Transaction ID: 580629

13044324680

Atlas reader Cathy (and others) has been indispensable in helping to track Obama's very questionable campaign donations. A number of Atlas readers have been helping me go through thousands upon thousands of docs relating to Obama's business, legal activity, foreign and domestic.

The latest jawdropper: there is a large contributor in the 'G's'. Largest.



Name [REDACTED] is Monir Edwan. City is Rafah and the State is GA. You'd think GA is for Georgia. IT'S NOT! There is no Rafah Georgia. It's Rafah GAZA. Although election donor data indicate Georgia, USA

File here: Donation Detail Adwan, Monir | Rafah, Georgia. There ain't no such place in the land of Georgia neither.

It's a Gaza refugee camp.

The file attached has both Monir & Hosam Edwan. Both from Rafah. Both over allowed spending limit. Here is the file: Download EdwanDetail.xls.

It details Edwan's contributions totalling \$24,321.41. The contributions are all to Obama the candidate. Different files for the party or committees.

Our source of the data is from the FEC site. Presidential download file zip. Named ALL. Dated 6/30. Here is link Unzipped! It is the basis for everything submitted. Thanks Cathy!

How much money was raised from the phone banks in Gaza (see video)?

UPDATE: Schlüssel weights in

More on Obama's Foreign Contributions

UPDATE: First off, I will be filing a complaint with the FEC - either alone or through an organization. Cathy found more detail

There's more: Not in these spreads are not inclusive of all the information in the FEC detail file.

In October of 2007:

Hosam receipt dated 10/30/07 is for \$856.62 (general contribution) his Election Cycle total as of this date is \$5,387.13. On the database this amount is redirected (where is not known) but his total is still above allowed amounts (IF HE'S AMERICAN).

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Monir has two receipts. One dated 10/27/07 for \$1,290.63 (primary - this is in the FEC file), the second dated 10/28/07 for \$1,671.85 (primary - this is in the FEC file). The total on the receipt for Election Cycle is \$2,962.54 (above allowed). NOTE THE TOTAL HE-GAME LIST ON 10/30/07 ACCORDING TO THE FEC FILE IS \$7,435.91.

The phone banks were buzzing?

Contributions to Political Committees

EDWAN MONIR
RAFAH, GA
ACCOLTER ACCOUNTING

OBAMA BARACK
VIA OBAMA FOR AMERICA

10 27 2007	1290.63	200701190433
10 30 2007	1582.00	200701190434
10 30 2007	71.00	200701190435
10 30 2007	71.00	200701190436
10 30 2007	103.00	200701190437
10 30 2007	1499.00	200701190438
10 30 2007	1582.00	200701190439
10 30 2007	1582.00	200701190440
10 30 2007	1643.00	200701190441
10 30 2007	167.00	200701190442
10 31 2007	953.00	200701190443
10 31 2007	1494.00	200701190444
11 01 2007	1099.00	200701190445
11 01 2007	1389.00	200701190446
11 01 2007	1963.00	200701190447
11 01 2007	2017.00	200701190448
11 02 2007	873.00	200701190449
11 02 2007	873.00	200701190450
11 02 2007	1282.00	200701190451
11 02 2007	1389.00	200701190452
11 02 2007	1589.00	200701190453
11 11 2007	870.00	200701190454

Total Contributions: 24313.00

EDWAN MONIR

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[Download FECScreenShotMonirEdwanDonations.doc](#)

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Posted by Pamela Geller on Thursday, July 31, 2008 at 02:35 PM in [Obama's Contributions: Foreign and Domestic](#) | [Permalink](#) | [Comments \(11\)](#) | [TrackBack \(3\)](#)

13044324683

Exhibit R

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http://atlashbrunz2000.tycoonad.com/atlas_sbrunz/obamas_foreign_contributions/

Saturday, October 25, 2008

CONTRIBUTION FRAUD: John Galt, Saddam Hussein, Osama Bin Laden, Bill Ayers - Obama has Charged Your Credit card

When asked about the possibility that a single person could use fake names to mask many donations sent via a few credit cards, /General Counsel, Robert/ Bauer responded that "both campaigns seem to be in a similar position." National Journal here

McCain does not accept these donations. We have attempted time and time again.

The McCain campaign does accept normal credit card donations because staffers can easily check whether the owner of the credit card shares the same billing address as the listed donor, she said. That address-check process costs the campaign about 12 cents, she said.

"We could lower our standards and accept more money... but this is John McCain's campaign, and he wants to root out fraud in fundraising and have everything open and as honest as possible," said Donatelli. National Journal here

Craig confirms that the credit card charges for John Galt, Saddam Hussein, Osama Bin Laden, and Bill Ayers have gone through. So much for Obama's rigorous credit card screening.

Payment Due Nov. 11, 2008	LAST PAYMENT DUE	NOV. 24, 2008
CHARGES	LAST PAYMENT AMOUNT	\$391.87
	AMOUNT PAID THIS MONTH	\$0.00
• View Your Online Payments		
Search All Account Activity		
Search Time Period:	Transaction Type:	
Default View	All Transactions	Transactions
Activity Since Last Statement		
Date	Description	Amount
10/22/2008	OSAMA FOR AMERICA 3128192416 IL	\$15.00
10/22/2008	OSAMA FOR AMERICA 3128192416 IL	\$15.00
10/22/2008	OSAMA FOR AMERICA 3128192416 IL	\$15.00
10/22/2008	OSAMA FOR AMERICA 3128192416 IL	\$15.00
10/22/2008	OSAMA FOR AMERICA 3128192416 IL	\$15.00
10/22/2008	OSAMA FOR AMERICA 3128192416 IL	\$15.00
10/22/2008	OSAMA FOR AMERICA 3128192416 IL	\$15.00

This from Craig

It took a few days to confirm, but as of this morning all four charges have posted to my CC account (see attached). Remember, these were all separate donations made by:

John Galt

Saddam Hussein

Osama Bin Laden

Bill Ayers

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And I have the screenshots to prove it. Also, I made another attempt this morning to make a \$10 donation under the name Tony Rezko (See attachment.) And it went thru again. So reports that things have been fixed are erroneous.

Further, last night on Sheppard Smith's 3pm-ET show this issue was brought up briefly and they cited the Obama campaign falsely claiming that this sort of thing happens at the McCain site and that they catch these errors later in the processing. Well, it took three days to process my donations and they all skirted through their rigorous screening.



TONY REZKO

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I'm in the web development business and it's clear to me that Obama has a sophisticated system that could easily flag and reject these donations if they wished to do so. The fact that only one of my donations showed up on my CC statement within the first 24-hrs initially gave me pause that they were screaming for fraud (even though I gave a completely fake address that didn't match my card). However, when the other three donations showed up three days later, it only confirmed my worst suspicions.

Believe me, a major part of what I do for a living is Web-Analytcs where I analyze and digest website traffic statistics on individual websites and sort thru in the most intricate of detail; new visitors, browser type, sales transactions, email addresses etc. This is WebStuff 101. And even the most basic Web-Analytcs and database tools would allow Obama to reject these phony donations before they occur, as the McCain site does. Further, it's laughable that the Obama camp claim it's too complicated to make their under-\$200 donor information available. Again, even the most basic Web-Analytcs and database tools would allow the Obama camp to make this info available the way McCain does. This happens, on McCain's part, enabled the AP to finally find something worthy of reporting on this issue;

"The McCain Campaign website also lists 23 anonymous contributions in excess of fifty dollars, despite the legal requirements to maintain the names and addresses of each contributor any amount in excess of \$50, and dozens of additional donors who provided incomplete information." ([link here](#))

The info is easily available if you try. But Obama isn't trying, and in fact has enabled the fraud to occur. This is a clear case of facilitation of fraud. As others have reported:

"[I]n order to accept donations from "Della Ware" and "Saddam Hussein" et al, the Obama website had, intentionally, to disable all the default security settings on their credit-card processing. I took a look at the inner workings of my (less, far more modest) online retail operation this afternoon and, in order to prevent fraud as easy as that while the Obama campaign is facilitating, you have to uncheck every single box on the AHS system, each one of which makes it very explicit just what you're doing - ie, accepting transactions with no "billing address", no "install address" match, no "zip code" match, with a bank "of non-US origin" (I've got nothing against these, but a US campaign fundraiser surely should be wary), etc. When you've disabled the whole lot one step at a time, then you've got a system tailor-made for fake names and bogus addresses."

Continue reading "CONTRIBUTION FRAUD: John Galt, Saddam Hussein, Osama Bin Laden, Bill Ayers - Obama has Chained Your Credit card" »

Posted by Ramona Geller on Saturday, October 25, 2008 at 02:26 PM in Obama's Contributions: Foreign and Domestic | Permalink | Comments (4) | TrackBack (0)

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Exhibit 8

Page 1 of 3

With Huge Money Advantage, Obama Ramps Up Ads

By Matthew Mosk

Washington Post Staff Writer

Wednesday, October 15, 2008; Page A05

Sen. John McCain stepped into a ballroom at the Grand Hyatt in New York last night for what was likely to be his last fundraiser of the 2008 presidential campaign.

But while the event, which was expected to net \$4 million to \$4.9 million for the Republican National Committee, will provide a much-needed infusion for the GOP nominee, it will do little to whittle down the massive financial advantage that Sen. Barack Obama is using to dominate the electoral landscape.

Exactly how much money the Democrat has raised will not be clear until next week, when the two campaigns are required to report their September fundraising totals to the Federal Election Commission, although some strategists are openly speculating that he could approach \$100 million for the month. That would shatter a record Obama set in August, when he brought in \$67 million.

As the first presidential candidate to run a general-election campaign entirely with private donations, Obama is building a significant fundraising advantage and is now using that imbalance to swamp McCain on the airwaves and in building turnout operations coast to coast.

Voters in large swaths of Florida will see Obama television commercials dozens of times before catching sight of a McCain ad. A drive across Virginia will wind past 41 Obama field offices, compared with 19 for McCain. "It's given them resources to compete in multiple battlegrounds in all dimensions -- on the ground, through the mail, with media, everything," Chris Kofinis, a Democratic political strategist, said of Obama's fundraising success. "I think people will look back and say this was one of the most pivotal decisions in his campaign."

Since accepting \$54 million in public funds, McCain has been hampered from raising money for his own campaign. He has sought to keep pace with Obama's effort by holding RNC fundraisers like last night's event in New York. The party committee raised \$66 million in September and has begun to expand its presence on television with ads featuring blistering attacks on Obama.

At the same time, the RNC is leading an effort to challenge the legality of millions of dollars in "un-itemized" donations that Obama has collected. Under FEC rules, his campaign does not have to document the names of donors who give less than \$200.

The RNC is keeping a growing list of phony donors and unexplained credit card charges that it believes point to more than a simple inability by the Obama team to keep track of all the money flowing in. Steve and Rachel Lammie, a Missouri couple who vote Republican, told local reporters that they found a \$2,300 charge for a donation to the Obama campaign on their credit card statement that they could not explain. Patricia Phillips, a Virginia Republican, had a similar experience, she said, when she opened her MasterCard statement last month to discover a \$5 charge from the Obama campaign. "I thought, 'Oh, my! This is not from me,'" she said.

Other donations have arrived under such obviously bogus names as Edry Eddy and Es Esh.

Experts called it a common problem on an uncommon scale -- while there have always been donors who, for a host of reasons, tried to circumvent federal election rules and give campaign contributions without providing their real names, they are more frequent with Obama because of the volume of donations his campaign is processing.

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"I'm sure they have a system in place to screen out improper donations," said Scott Thomas, a former FEC chairman. "Their pretenses indicate there's such a massive donor base and so many others coming in that it's hard to keep up."

Obama campaign aides said they have followed a policy of sending immediate refunds to people who contact the campaign to say that they have been charged for a contribution they did not make. "While no organization is protected from Internet fraud, we have taken every available step to root out improper contributions, updating our systems when necessary," said Ben LaBolt, a campaign spokesman.

So far, the complaints have not prompted FEC action. And Obama's controversial decision to forgo public funding and instead raise money on his own is paying huge dividends.

noticeable evidence of his spending advantage has been on the airwaves, where, in some states, Obama been running seven or eight times as many commercials as McCain. Even Tracey, an analyst with the Campaign Media Analysis Group, called the disparity stunning.

"McCain's in a shouting match with a guy holding a bullhorn," Tracey said.

Obama booked nearly \$4 million in ads in Virginia last week, compared with \$487,149 spent there by McCain. He held a similar spending edge in almost every battleground state, Tracey said, enabling him to respond to negative ads by McCain while keeping a regular cycle of positive ads running as well.

Obama has so much money available that he is considering to push into advertising venues rarely, if ever, visited by political candidates. He has plans for a prime-time infomercial -- the first of its type since Ross Perot used the format 16 years ago. And Advertising Age reported yesterday that an Obama "in-game advertisement" appeared in the EA video game Burnout Paradise. The racing game features a Barack Obama billboard announcing that early voting has begun and references VoteForChange.com, a site paid for by the Obama campaign.

Republican political strategists have acknowledged the Obama advantage, but they argue that if a financial edge is all it takes to win an election, McCain would not be the nominee. (He was masterfully outspent by former Massachusetts governor Mitt Romney and former New York mayor Rudolph W. Giuliani during the primaries.)

The biggest difficulty for McCain, said Republican political consultant Kevin Madden, is that he has been forced to play defense in states -- such as North Carolina and Indiana -- where he should not be spending money at all at this point.

"The campaign with the money can pin the other campaign down in places where they don't want to be," Madden said.

One result of Obama's decision to opt out of the public financing system is that his campaign accounts will not automatically be subject to an audit after the election, as is standard with campaigns financed from the U.S. Treasury.

Last week, RNC lawyers filed an FEC complaint that they hope will prompt an investigation and audit. The complaint said the RNC believes that the Obama campaign "has accepted prohibited foreign national contributions and knowingly done so through its failure to reasonably investigate contributions originating abroad."

Obama aides dispute this, saying they have bent over backward trying to root out illegal contributions. But that task, they said, has been made difficult by the sheer volume of contributions, many in increments of \$5 and \$10.

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The campaign has taken a number of steps to intercept illegal contributions, whether they are from people using fake names or from donors who are not U.S. citizens, Obama said. The campaign has initiated procedures to flag questionable contributions and follow up with donors to determine whether those contributions are lawful or should be refunded.

"Every campaign faces the challenge of screening and reviewing its contributions," LeBoit said. "And we have been aggressive about taking every available step to make sure our contributions are appropriate, updating our systems when necessary."

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