

SANDLER, REIFF & YOUNG, P.C.

January 13, 2011

Jeff S. Jordan, Esq.
Office of the General Counsel
Federal Election Commission
999 E. Street, NW
Washington, DC 20463

Re: MUR 6411
Respondent Citizens for Strength and Security

Dear Mr. Jordan:

I am responding on behalf of Citizens for Strength and Security ("CSS"), an unincorporated association organized under Section 527 of the Internal Revenue Code, to a frivolous complaint filed by Clea Mitchell and Colin Hanna.

Ms. Mitchell and Mr. Hanna incorrectly allege that simply because CSS ran a television advertisement after two news reports happened to indicate that some Members of Congress were frustrated at the amount of third-party spending for Democrats that CSS's advertisement amounted to a coordinated communication. They are wrong on the facts and the law.

CSS exercised their Constitutional right to speak on issues of importance in close proximity to an election and did so without coordinating with any candidate, campaign committee, or party committee in full compliance with the requirements set forth in the Federal Election Campaign Act of 1971, as amended (2 U.S.C. §431 *et seq.*) (the "Act"), and Federal Election Commission regulations.

We respectfully request that the Commission find "no reason to believe" there was a violation and close this matter with respect to CSS for the reasons stated below.

1. Factual Background

CSS was established on August 22, 2008 for the purpose of communicating with the public on issues of importance in a manner that does not expressly advocate the election or defeat of any clearly identified federal, state, or local candidates.¹ CSS first began running issue advocacy communications in October 2008² and continued in 2009 and 2010.

¹ See Exhibit 1, IRS Form 8871 Political Organization Notice of Section 527 Status

² See Exhibit 2, FBC Form 9 (Oct. 3, 2008)

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FEDERAL ELECTION
COMMISSION

2011 JAN 14 PM 4:00

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In January 2010, CSS made the independent decision to make electioneering communications in Massachusetts.³ CSS continued to make disbursements for issue advocacy and electioneering communications in March, April, June, August, September, and October.⁴

Material decisions related to CSS's electioneering communications in 2010 were made independently -- not in cooperation, consultation or concert with, or at the request or suggestion of any candidate, candidate's authorized committee, political party committee, or any agents acting on behalf of any candidate, candidate committee, or a party committee.⁵ None of CSS's communications were made in response to statements made by any person in the *Roll Call* or *Politico* articles relied upon as "evidence" of coordination by Ms. Mitchell and Mr. Hanna.⁶

2. Legal Analysis

The primary issue in this matter is whether CSS's October electioneering communications were coordinated with, and thus resulted in an excessive contribution to, any Federal candidate.⁷ Under the Act, a payment for a communication that is made by any person "in cooperation, consultation, or concert, with or at the request or suggestion of" a candidate or his or her agent constitutes an in-kind contribution to that candidate.⁸

Ms. Mitchell and Mr. Hanna's complaint inaccurately alleges that CSS's October electioneering communications that clearly identified both U.S. Senate and U.S. House candidates were made in response to statements made by House Members in the *Roll Call* and *Politico* stories.

The Commission's regulations provide a three-prong test to determine whether a communication is coordinated: (1) payment for communication must be made by a person other than a candidate committee, (2) the communication must meet the "content" standard, and (3) the parties must engage in activity that meets the "conduct" prong.⁹ All three prongs of the test must be satisfied for a coordinated communication to occur.¹⁰

³ See Exhibit 3, FEC Form 9 (Jan. 13, 2010) and Declaration of Jeremy Van Ess at 7 (Jan. 6, 2011)

⁴ See Exhibits 4, 5, 6, and 7, IRS Political Organization Reports of Contributions and Expenditures dated April 15, 2010, July 15, 2010, October 15, 2010, and October 21, 2010. See CSS's October 2010 FEC Form 9 at <http://query.nictusa.com/cgi-bin/fecimg/FEC30001239>

⁵ See Van Ess Decl. at 7

⁶ See Van Ess Decl. at 4. The two articles relied upon by Ms. Mitchell and Mr. Hanna are Anna Palmer, *Democrats Angry that Liberal Groups Aren't Helping*, *Roll Call* (Sep. 17, 2010) and Jonathan Miller, *Dem Lag Badly in Outside Spending*, *Politico* (Sep. 22, 2010). (the "*Roll Call* and *Politico* Stories")

⁷ 2 U.S.C. §441a(a)(7)(B)(i); 11 C.F.R. §109.21(b)(i)

⁸ 2 U.S.C. §441a(a)(7)(B)(i); 11 C.F.R. §109.21(b)(i)

⁹ 11 C.F.R. §109.21(a)

¹⁰ 11 C.F.R. §109.21(a)

CSS

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The payment prong and the content prongs of the test were satisfied but the conduct prong was not. The payment prong of the test was satisfied because the communications were paid for by a person, CSS, other than a Federal candidate, the candidate's authorized committee, or political party committee, or any agent of the foregoing.¹¹ The "content" prong of the test was also satisfied because some of CSS's October communications were electioneering communications.¹²

The conduct prong, however, was not met. The conduct prong requires that the parties engage in at least one of six conduct standards.¹³ In this matter, the alleged improper conduct is that CSS made communications at the request or suggestion of a candidate, his or her authorized committee, a political party or any agent of any of the foregoing.¹⁴

Ms. Mitchell and Mr. Hanna incorrectly assert that the *Roll Call* and *Politico* stories "clearly establish that Representatives Pelosi and Larson 'requested' that outside organizations spend on behalf of Democratic candidates, while unnamed aides reiterated the requests and added retaliatory threats."¹⁵ They do not claim that any of the other conduct standards required under 11 C.F.R. §109.21(d) were met.

In this matter, the parties did not engage in activity that met the conduct prong of the coordination test. First, none of CSS's communications were made at the request or suggestion of a candidate, his or her authorized committee, a political party or any agent of any of the foregoing.¹⁶ In his declaration, Mr. Van Ess testified that all material decisions related to CSS's communications were made independently of any candidate, their authorized committee, a party committee or any of their agents.¹⁷

Second, the person who made the material decisions related to CSS's communications did not learn about the statements made in the September *Roll Call* and *Politico* stories until receiving Ms. Mitchell and Mr. Hanna's complaint in November. Mr. Van Ess did not even read the stories before CSS made its communications so it is not possible that they were made in response to the articles.¹⁸

Third, general public requests by a candidate do not fulfill the conduct prong of the coordination regulations. The Commission stated in its Explanation and Justification for the coordination regulations that:

¹¹ 11 C.F.R. §109.21(a)(1)

¹² 11 C.F.R.

¹³ 11 C.F.R. §109.21(d)(1)-(6)

¹⁴ 11 C.F.R. §109.21(d)(1)

¹⁵ Complaint at 6

¹⁶ See Van Ess Decl. at 8

¹⁷ See Van Ess Decl. at 7

¹⁸ See Van Ess Decl. at 5

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The "request or suggestion" conduct standard in paragraph (d)(1) is intended to cover requests or suggestions made to a select audience, but not those offered to the public generally. For example, a request that is posted on a web page that is available to the general public is a request to the general public and does not trigger the conduct standard in paragraph (d)(1), but a request posted through an intranet service or sent via electronic mail directly to a discrete group of recipients constitutes a request to a select audience and thereby satisfies the conduct standard in paragraph (d)(1). Similarly, a request in a public campaign speech or a newspaper advertisement is a request to the general public and is not covered, but a request during a speech to an audience at an invitation-only dinner or during a membership organization function is a request to a select audience and thereby satisfies the conduct standard in paragraph (d)(1).¹⁹

All of the statements found in the *Roll Call* and *Politico* Stories relied upon by Ms. Mitchell and Mr. Hanna to support their complaint against CSS are general public statements that do not satisfy the conduct prong of the FEC regulations. Since no one materially involved with CSS's communications had, or received, any private or discrete communications with or from Representative Pelosi, Representative Larson, any candidate, or their agents regarding CSS's communications then all of the information found in the *Roll Call* and *Politico* Stories are general public statements with regard to CSS. And, as noted above, Mr. Van Es did not even read the stories before CSS made its communications in October.

Finally, the Complaint does not include any allegation or evidence that Representative Pelosi or Larson were agents with "actual authority, either express or implied" to act on behalf of any other candidate.²⁰ As a result, even if Representative Pelosi or Larson did request or suggest that some third party organization create, produce, or distribute a communication in the candidate's district it would not result in coordination. The Commission explained:

Where Candidate A requests or suggests that a third party pay for an ad expressly advocating the election of Candidate B, and the third party publishes a communication with no reference to Candidate A, no coordination will result between Candidate B and the third party payor. However, if Candidate A is an 'agent' for Candidate B ... then the communication would be coordinated.²¹

¹⁹ FEC, Explanation and Justification, *Coordinated and Independent Expenditures*, 68 Fed. Reg. 421, 432 (Jan. 3, 2003)

²⁰ 11 C.F.R. §109.3

²¹ FEC, Explanation and Justification, *Coordinated and Independent Expenditures*, 68 Fed. Reg. 421, 431 (Jan. 3, 2003)

CSS did not have any communications with Representative Pelosi or Larson concerning its communications. Therefore, the "conduct" prong could not be met even if Representative Pelosi or Larson were acting as agents for another candidate.

Contrary to the assertions made in the complaint, CSS's electioneering communications were not made at the request or suggestion of any candidate, party committee, or their agents. CSS did not engage in any activity that satisfied the "conduct" prong of the Commission's coordination test. Therefore, CSS's electioneering communications cannot be deemed coordinated communications under the Commission's regulations.

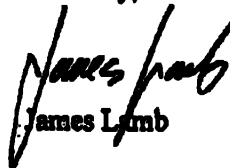
3. Conclusion

CSS's October electioneering communications were not made in coordination with any members of the U.S. House of Representatives.

Material decisions related to CSS's electioneering communications were made independently – not in cooperation, consultation or concert with, or at the request or suggestion of any candidate, candidate's authorized committee, political party committee, or any agents acting on behalf of any candidate, candidate committee, or party committee. CSS's communications were not made in response to the *Roll Call* and *Politico* stories.

CSS respectfully requests that the Commission find no reason to believe that it violated the Act or Commission regulations and that it close this matter promptly.

Sincerely,


James Lamb

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**Political Organization
Notice of Section 527 Status**

Part I General Information

1 Name of organization Citizens for Strength and Security		Employer identification number 26 - 3220209
2 Mailing address (P.O. box or number, street, and room or suite number) 1717 M Street, NW S342		
City or town, state, and ZIP code Washington, DC 20036		
3 Check applicable box: <input checked="" type="checkbox"/> Initial notice <input type="checkbox"/> Amended notice <input type="checkbox"/> Final notice		
4a Date established 08/22/2006	4b Date of material change 08/22/2006	
5 E-mail address of organization no@email		
6a Name of custodian of records Lora Haggard	6b Custodian's address 29 Briarwood Drive Ringgold, GA 30736	
7a Name of contact person Lora Haggard	7b Contact person's address 29 Briarwood Drive Ringgold, GA 30736	
8 Business address of organization (if different from mailing address shown above). Number, street, and room or suite number 1717 M Street, NW S342		
City or town, state, and ZIP code Washington, DC 20036		
9a Election authority NONE	9b Election authority identification number	

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

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

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

11 Is this organization claiming exemption from filing Form 990 (or 990-EZ), Return of Organization Exempt From Income Tax, as a recognized agent of state or local officials? Yes No

Part III Purpose

12 Describe the purpose of the organization

To communicate with the public on issues of importance in a manner that does not expressly advocate the election or defeat of a clearly identified federal, state, or local candidate.

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Part IV List of All Related Entities (see instructions)

13 Check if the organization has no related entities.

14a Name of related entity	14b Relationship	14c Address
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Part V List of All Officers, Directors, and Highly Compensated Employees (see instructions)

15a Name	15b Title	15c Address
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Lore Haggard	Treasurer	29 Briarwood Drive Ruggold, GA 30736
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Under penalties of perjury, I declare that the organization named in Part I is to be treated as a tax-exempt organization described in section 527 of the Internal Revenue Code, and that I have examined this notice, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. I further declare that I am the official authorized to sign this report, and I am signing by entering my name below.

Lore M Haggard

08/22/2008

Sign Here

▶ _____ ▶ _____
Name of authorized official Date

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FEC FORM 9
24 HOUR NOTICE OF DISBURSEMENTS/OBLIGATIONS FOR
ELECTIONEERING COMMUNICATIONS

1. Individual, Organization or Qualified Nonprofit Corporation Making the Disbursement/Obligations

(a) Name
Citizens For Strength and Security

(b) Address (number and street) check if different than previously reported
1718 M Street, NW #312

(c) City, State and ZIP Code
Washington DC 20036

2. FEC Identification Number

C 00000000

(d) Name of Employer or Principal Place of Business
NA

(e) Occupation
NA

3. Is This Statement New
or
 Amended

4. Covering Period

08 / 02 / 2008
through
10 / 02 / 2008

5. (a) Date of Public Distribution(s) 10 / 02 / 2008 (b) Communication Title Bank Withdrawals

6. The filer is a(n): (a) Individual (b) Unincorporated Organization (c) Qualified Nonprofit Corporation (11 CFR 114.10)
(d) Corporation, Labor Organization or Qualified Nonprofit Corporation making communications under 11 CFR 114.15
(e) Other, specify: 527 Political Org.

7. Were the disbursements for the electioneering communication made exclusively from donations to a segregated bank account? Yes No

8. Custodian of Records

(a) Name
Haggard Lark

(b) Address (number and street)
1718 M Street, NW

(c) City, State and ZIP Code
Washington DC 20036

(d) Name of Employer or Principal Place of Business
Citizens For Strength and Security

(e) Occupation
Treasurer

9. Total Donations This Statement 790925.00

10. Total Disbursements/Obligations This Statement 672225.00

Under penalty of perjury, I certify that this statement is true, correct and complete.

TYPE OR PRINT NAME OF PERSON COMPLETING FORM Lark Haggard

SIGNATURE Electronically Filed by Lark Haggard

DATE 10/03/2008

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

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SCHEDULE 9-A
Donation(s) Received

A. Full Name of Donor Patriot Majority Fund			Date of Receipt 08 / 18 / 2008
Mailing Address of Donor 3212 Smith Street 8208			Amount 290000.00
City Houston	State TX	Zip 77008	Transaction ID: F82.000001
B. Full Name of Donor Communications Workers of America			Date of Receipt 08 / 20 / 2008
Mailing Address of Donor 801 Third Street, NW			Amount 290000.00
City Washington	State DC	Zip 20001	Transaction ID: F82.000002
C. Full Name of Donor SETU			Date of Receipt 08 / 30 / 2008
Mailing Address of Donor 1800 Massachusetts Avenue, NW			Amount 220000.00
City Washington	State DC	Zip 20036	Transaction ID: F82.000003
SUBTOTAL of Donations This Page (optional) 700000.00			
TOTAL This Period (last page fill the number only) 700000.00 (carry total from last page to Line 9)			

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**SCHEDULE B-B
Disbursements Made or Obligations**

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A. Full Name (Last, First, Middle Initial) of Payee LUC Media					Date of Disbursement or Obligation MM / DD / YYYY 08 / 30 / 2008					
Mailing Address of Payee 25 Whitlock Place 8201					Amount 66000.00					
City Marietta		State GA		Zip Code 30064		Communication Date MM / DD / YYYY 10 / 02 / 2008				
Name of Employer LUC Media			Occupation Media			Transaction ID: FES00001				
Purpose of Disbursement (including title(s) of communication(s)) TV AD: Best When Jobs										
Name of Federal Candidate Elizabeth Dole			Office Sought X Senate President		State NC		Disbursement/Obligation For: 2008 Primary <input type="checkbox"/> General <input checked="" type="checkbox"/>			Other (specify)
Name of Federal Candidate Elizabeth Dole			Office Sought: House Senate President		State: District:		Disbursement/Obligation For: Primary General			Other (specify)
Name of Federal Candidate Elizabeth Dole			Office Sought: House Senate President		State: District:		Disbursement/Obligation For: Primary General			Other (specify)
B. Full Name (Last, First, Middle Initial) of Payee See Change Media					Date of Disbursement or Obligation MM / DD / YYYY 10 / 02 / 2008					
Mailing Address of Payee 8009 West Knoll Drive #D					Amount 2323.00					
City West Hollywood		State CA		Zip Code 90069		Communication Date MM / DD / YYYY 10 / 02 / 2008				
Name of Employer See Change Media			Occupation Media			Transaction ID: FES00002				
Purpose of Disbursement (including title(s) of communication(s)) TV AD Production										
Name of Federal Candidate Elizabeth Dole			Office Sought: X Senate President		State: NC		Disbursement/Obligation For: 2008 Primary <input type="checkbox"/> General <input checked="" type="checkbox"/>			Other (specify)
Name of Federal Candidate Elizabeth Dole			Office Sought: House Senate President		State: District:		Disbursement/Obligation For: Primary General			Other (specify)
Name of Federal Candidate Elizabeth Dole			Office Sought: House Senate President		State: District:		Disbursement/Obligation For: Primary General			Other (specify)
SUBTOTAL of Disbursement/Obligation This Page (optional)					67323.00					
TOTAL This Period (last page this line number only) (carry total from last page to line 10)					67323.00					

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

<input type="checkbox"/> Hand Delivered	Date of Receipt
<input type="checkbox"/> USPS First Class Mail	Postmarked
<input type="checkbox"/> USPS Registered/Certified	Postmarked (R/C)
<input type="checkbox"/> USPS Priority Mail	Postmarked
Delivery Confirmation™ or Signature Confirmation™ Label <input type="checkbox"/>	
<input type="checkbox"/> USPS Express Mail	Postmarked
<input type="checkbox"/> Postmark Illegible	
<input type="checkbox"/> No Postmark	
<input type="checkbox"/> Overnight Delivery Service (Specify):	Shipping Date
	Next Business Day Delivery <input type="checkbox"/>
<input type="checkbox"/> Received from House Records & Registration Office	Date of Receipt
<input type="checkbox"/> Received from Senate Public Records Office	Date of Receipt
<input type="checkbox"/> Received from Electronic Filing Office	Date of Receipt
<input checked="" type="checkbox"/> Other (Specify): <i>Web Form # 276</i>	Date of Receipt or Postmarked <i>10/3/08</i>

JSD
 PREPARER
 (3/2005)

10/3/08
 DATE PREPARED

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FEC FORM 9 24 HOUR NOTICE OF DISBURSEMENTS/OBLIGATIONS FOR ELECTIONEERING COMMUNICATIONS

1. Individual, Organization or Qualified Nonprofit Corporation Making the Disbursement/Obligations

(a) Name
CITIZENS FOR STRENGTH AND SECURITY

(b) Address (number and street) check if different than previously reported
1718 M STREET NW 8342

(c) City, State and ZIP Code
WASHINGTON DC 20036

(d) Name of Employer or Principal Place of Business (e) Occupation

2. FEC Identification Number

C C3001258

3. Is This Statement New
or
 Amended

4. Covering Period MM ' 01 , DD ' 12 , Y 2010
through
MM ' 01 , DD ' 13 , Y 2010

5. (a) Date of Public Distribution(s) MM ' 01 , DD ' 13 , Y 2010 (b) Communication Title The Same

6. The filer is a(n): (a) Individual (b) Unincorporated Organization (c) Qualified Nonprofit Corporation (11 CFR 114.10)
(d) Corporation, Labor Organization or Qualified Nonprofit Corporation making communications under 11 CFR 114.15
(e) Other, specify: 527 Political Org.

7. Were the disbursements for the electioneering communication made exclusively from donations to a segregated bank account? Yes No

8. Custodian of Records

(a) Name

Lora Haggard

(b) Address (number and street)

1718 M Street, NW

(c) City, State and ZIP Code

Washington DC 20036

(d) Name of Employer or Principal Place of Business

Citizens For Strength And Security

(e) Occupation

Treasurer

9. Total Donations This Statement 123913.00

10. Total Disbursements/Obligations This Statement 285878.00

Under penalty of perjury, I certify that this statement is true, correct and complete.

TYPE OR PRINT NAME OF PERSON COMPLETING FORM Lora Haggard

SIGNATURE Electronically Filed by Lora Haggard

DATE 01/14/2010

NOTE: Submission of false, erroneous or incomplete information may subject the person signing this statement to the penalties of 18 U.S.C. 487g.

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SCHEDULE 9-A
Donation(s) Received

11044294643

<p>A. Full Name of Donor Communications Worker of America</p> <p>Mailing Address of Donor 501 Third Street, NW</p> <p>City State Zip Washington DC 20001</p>	<p>Date of Receipt MM / DD / YYYY 01 / 27 / 2009</p> <p>Amount 20000.00</p> <p>Transaction ID: F92.000081</p>
<p>B. Full Name of Donor SEIU</p> <p>Mailing Address of Donor 1800 Massachusetts Avenue, NW</p> <p>City State Zip Washington DC 20036</p>	<p>Date of Receipt MM / DD / YYYY 04 / 18 / 2009</p> <p>Amount 20000.00</p> <p>Transaction ID: F92.000002</p>
<p>C. Full Name of Donor Communications Worker of America</p> <p>Mailing Address of Donor 501 Third Street, NW</p> <p>City State Zip Washington DC 20001</p>	<p>Date of Receipt MM / DD / YYYY 04 / 21 / 2009</p> <p>Amount 10000.00</p> <p>Transaction ID: F92.000003</p>
<p>D. Full Name of Donor SEIU</p> <p>Mailing Address of Donor 1800 Massachusetts Avenue, NW</p> <p>City State Zip Washington DC 20036</p>	<p>Date of Receipt MM / DD / YYYY 05 / 07 / 2009</p> <p>Amount 30000.00</p> <p>Transaction ID: F92.000004</p>
<p>E. Full Name of Donor LUC Media (Refund)</p> <p>Mailing Address of Donor 25 Whitlock Avenue, NW Suite 201</p> <p>City State Zip Marietta GA 30064</p>	<p>Date of Receipt MM / DD / YYYY 10 / 28 / 2009</p> <p>Amount 50313.00</p> <p>Transaction ID: F92.000005</p>
<p>SUBTOTAL of Donations This Page (optional): 850313.00</p>	
<p>TOTAL This Period (last page fills line number only): (carry total from last page to Line 9)</p>	

Image# 10930038091
SCHEDULE 9-A
Donation(s) Received

11044294644

<p>A. Full Name of Donor SEIU Mailing Address of Donor 1800 Massachusetts Avenue, NW City State Zip Washington DC 20036</p>	<p>Date of Receipt MM / DD / YYYY 12 / 08 / 2009 Amount 100000.00 Transaction ID : F92.000006</p>
<p>B. Full Name of Donor SEIU Mailing Address of Donor 1800 Massachusetts Avenue, NW City State Zip Washington DC 20036</p>	<p>Date of Receipt MM / DD / YYYY 01 / 12 / 2010 Amount 100000.00 Transaction ID : F92.000007</p>
<p>C. Full Name of Donor Communications Worker of America Mailing Address of Donor 501 Third Street, NW City State Zip Washington DC 20001</p>	<p>Date of Receipt MM / DD / YYYY 01 / 13 / 2010 Amount 100000.00 Transaction ID : F92.000008</p>
<p>D. Full Name of Donor SEIU Mailing Address of Donor 1800 Massachusetts Avenue, NW City State Zip Washington DC 20036</p>	<p>Date of Receipt MM / DD / YYYY 01 / 13 / 2010 Amount 100000.00 Transaction ID : F92.000009</p>
<p>SUBTOTAL of Donations This Page (optional)..... 400000.00</p>	
<p>TOTAL This Period (last page this line number only)..... 1250313.00 (carry total from last page to Line 9)</p>	

SCHEDULE 9-B
Disbursement(s) Made or Obligations

11044294645

A. Full Name (Last, First, Middle Initial) of Payee LUC Media				Date of Disbursement or Obligation MM / DD / YYYY 01 / 13 / 2010	
Mailing Address of Payee 25 Whiteack Place Suite 201				Amount 250000.00	
City Marietta	State GA	Zip Code 30064			
Name of Employer N/A		Occupation N/A	Communication Date MM / DD / YYYY 01 / 13 / 2010		
Purpose of Disbursement (Including title(s) of communication(s)) Media Buy: The Same					
Name of Federal Candidate Scott Brown FSA 000083	Office Sought: <input checked="" type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President	State: MA District: _____	Disbursement/Obligation For: 2010 <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) <u>Special Election</u>		
Name of Federal Candidate _____	Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President	State: _____ District: _____	Disbursement/Obligation For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) _____		
Name of Federal Candidate _____	Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President	State: _____ District: _____	Disbursement/Obligation For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) _____		
B. Full Name (Last, First, Middle Initial) of Payee Three Point Media, LLC				Date of Disbursement or Obligation MM / DD / YYYY 01 / 12 / 2010	
Mailing Address of Payee 1000 Potomac Street, NW S500				Amount 15876.96	
City Washington	State DC	Zip Code 20007			
Name of Employer N/A		Occupation N/A	Communication Date MM / DD / YYYY 01 / 12 / 2010		
Purpose of Disbursement (Including title(s) of communication(s)) Media Production: The Same					
Name of Federal Candidate Scott Brown FSA 000004	Office Sought: <input checked="" type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President	State: MA District: _____	Disbursement/Obligation For: 2010 <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) <u>Special Election</u>		
Name of Federal Candidate _____	Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President	State: _____ District: _____	Disbursement/Obligation For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) _____		
Name of Federal Candidate _____	Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President	State: _____ District: _____	Disbursement/Obligation For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) _____		
SUBTOTAL of Disbursement/Obligation This Page (optional)				251576.96	
TOTAL This Period (last page this line number only) (carry total from last page to line 18)				251576.96	

Exhibit 4

Form **8872**
(November 2002)

**Political Organization
Report of Contributions and Expenditures**

OMB No. 1545-1695

Department of the Treasury
Internal Revenue Service

▶ See separate instructions.

A For the period beginning 01/01/2010

and ending 03/31/2010

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

1 Name of organization
Citizens for Strength and Security

Employer identification number
26 - 3220209

2 Mailing address (P.O. box or number, street, and room or suite number)
1718 M Street, NW S342

City or town, state, and ZIP code
Washington, DC 20036

3 E-mail address of organization:
wo@email

4 Date organization was formed:
08/22/2008

5a Name of custodian of records
Lora Haggard

5b Custodian's address
29 Briarwood Drive
Ringgold, GA 30736

6a Name of contact person
Lora Haggard

6b Contact person's address
29 Briarwood Drive
Ringgold, GA 30736

7 Business address of organization (if different from mailing address shown above). Number, street, and room or suite number
1718 M Street NW S342

City or town, state, and ZIP code
Washington, DC 20036

8 Type of report (check only one box)

- First quarterly report (due by April 15)
- Second quarterly report (due by July 15)
- Third quarterly report (due by October 15)
- Year-end report (due by January 31)
- Mid-year report (New election year only - due by July 31)

- Monthly report for the month of: (due by the 20th day following the month shown above, except the December report, which is due by January 31):
- Pre-election report (due by the 12th or 15th day before the election):
 - (1) Type of election:
 - (2) Date of election:
 - (3) For the state of:
- Post-general election report (due by the 30th day after general election):
 - (1) Date of election:
 - (2) For the state of:

9 Total amount of reported contributions (total from all attached Schedules A).....9. \$ 930000

10 Total amount of reported expenditures (total from all attached Schedules B).....10. \$ 1000256

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

Lora Haggard

04/15/2010

Sign Here

Signature of authorized official

Date

11044294646

Schedule A	Schedule A
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Contributor's name, mailing address and ZIP code	Name of contributor's employer	Amount of contribution
Service Employees International Union 1800 Massachusetts Ave NW Washington, DC 20036	N/A Contributor's occupation N/A Aggregate contributions year-to-date \$ 200000	\$ 100000 Date of contribution 01/13/2010
Communications Workers of America 501 3rd Street, NW Washington, DC 20001	N/A Contributor's occupation N/A Aggregate contributions year-to-date \$ 100000	\$ 100000 Date of contribution 01/13/2010
Service Employees International Union 1800 Massachusetts Ave NW Washington, DC 20036	N/A Contributor's occupation N/A Aggregate contributions year-to-date \$ 200000	\$ 100000 Date of contribution 01/13/2010
Donald Susman Greenwich Centre Greenwich, CT 06836	Paloma Pasman Contributor's occupation Chairman Aggregate contributions year-to-date \$ 100000	\$ 100000 Date of contribution 01/14/2010
UFCW 1775 K Street, NW Washington, DC 20006	N/A Contributor's occupation N/A Aggregate contributions year-to-date \$ 100000	\$ 100000 Date of contribution 01/13/2010
Foundation For Patients Rights 1718 M Street, NW 5107 Washington, DC 20036	N/A Contributor's occupation N/A Aggregate contributions year-to-date \$ 250000	\$ 250000 Date of contribution 01/19/2010
Americans For Stable Quality Care 2200 17th Street, NW Washington, DC 20009	N/A Contributor's occupation N/A Aggregate contributions year-to-date \$ 180000	\$ 180000 Date of contribution 02/06/2010

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Schedule B	Itemized Expenditures	Schedule B
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Recipient's name, mailing address and ZIP code LUC Media 25 Whitlock Place S201 Marietta, GA 30064	Name of recipient's employer LUC Media Recipient's occupation Media Firm	Amount of Expenditure \$ 250000 Date of expenditure 01/13/2010
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Purpose of expenditure
Media Buy

Recipient's name, mailing address and ZIP code LUC Media 25 Whitlock Place S201 Marietta, GA 30064	Name of recipient's employer LUC Media Recipient's occupation Media Firm	Amount of Expenditure \$ 325000 Date of expenditure 01/15/2010
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Purpose of expenditure
Media Buy

Recipient's name, mailing address and ZIP code Bully Pulpit Interactive, LLC 1750 K Street Suite 450 Washington, DC 20006	Name of recipient's employer Bully Pulpit Interactive, LLC Recipient's occupation Media Firm	Amount of Expenditure \$ 70000 Date of expenditure 01/19/2010
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Purpose of expenditure
Internet Advertising/Production

Recipient's name, mailing address and ZIP code Bully Pulpit Interactive, LLC 1750 K Street Suite 450 Washington, DC 20006	Name of recipient's employer Bully Pulpit Interactive, LLC Recipient's occupation Media Firm	Amount of Expenditure \$ 30000 Date of expenditure 01/19/2010
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Purpose of expenditure
Internet Advertising/Production

Recipient's name, mailing address and ZIP code LUC Media 25 Whitlock Place S201 Marietta, GA 30064	Name of recipient's employer LUC Media Recipient's occupation Media Firm	Amount of Expenditure \$ 85900 Date of expenditure 01/29/2010
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Purpose of expenditure
Media Buy

Recipient's name, mailing address and ZIP code Three Point Media, LLC 1000 Potomac Street, NW Suite 500 Washington, DC 20007	Name of recipient's employer Three Point Media, LLC Recipient's occupation Media Firm	Amount of Expenditure \$ 13157 Date of expenditure 01/30/2010
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Purpose of expenditure
Media Production

Recipient's name, mailing address and ZIP code Lora Haggard 29 Briarwood Drive Ringgold, GA 30726	Name of recipient's employer Self-Employed Recipient's occupation Accounting	Amount of Expenditure \$ 10000 Date of expenditure 01/31/2010
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Purpose of expenditure
Accounting

Recipient's name, mailing address and ZIP code BB&T 8209 Greensboro Drive S1020 McLean, VA 22102	Name of recipient's employer BB&T Recipient's occupation Bank	Amount of Expenditure \$ 187 Date of expenditure 02/22/2010
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Purpose of expenditure
Bank Fees

Recipient's name, mailing address and ZIP code InVestni Research & Consulting One Financial Center, 3345 430 Shackleford Road Little Rock, AR 72211	Name of recipient's employer InVestni Research & Consulting Recipient's occupation Research	Amount of Expenditure \$ 10000 Date of expenditure 03/12/2010
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Purpose of expenditure
Research

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Recipient's name, mailing address and ZIP code
BB&T
8200 Greensboro Drive S1020
McLean, VA 22102

Name of recipient's employer
BB&T
Recipient's occupation
Bank

Amount of Expenditure
\$ 76
Date of expenditure
03/22/2010

Purpose of expenditure
Bank Fees

Recipient's name, mailing address and ZIP code
Arkansas For Change
1818 N. Taylor St., #628
Little Rock, AR 72207

Name of recipient's employer
Arkansas For Change
Recipient's occupation
Political Organization

Amount of Expenditure
\$ 190000
Date of expenditure
03/10/2010

Purpose of expenditure
Contribution

Recipient's name, mailing address and ZIP code
Three Point Media, LLC
1000 Potomac Street, NW Suite 500
Washington, DC 20007

Name of recipient's employer
Three Point Media, LLC
Recipient's occupation
Media Firm

Amount of Expenditure
\$ 15877
Date of expenditure
01/25/2010

Purpose of expenditure
Media Production

Recipient's name, mailing address and ZIP code
BB&T
8200 Greensboro Drive S1020
McLean, VA 22102

Name of recipient's employer
BB&T
Recipient's occupation
Bank

Amount of Expenditure
\$ 59
Date of expenditure
01/21/2010

Purpose of expenditure
Bank Fees

11044294649

Exhibit 5

Form **8872**
(November 2002)

**Political Organization
Report of Contributions and Expenditures**

OMB No. 1545-1696

Department of the Treasury
Internal Revenue Service

▶ See separate instructions.

A For the period beginning 04/01/2010 and ending 06/30/2010

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

1 Name of organization
Citizens for Strength and Security

Employer identification number
26 - 3226209

2 Mailing address (P.O. box or number, street, and room or suite number)
1718 M Street, NW S342

City or town, state, and ZIP code
Washington, DC 20036

3 E-mail address of organization:
no@email

4 Date organization was formed:
08/22/2008

5a Name of custodian of records
Lora Haggard

5b Custodian's address
29 Briarwood Drive
Ringgold, GA 30736

6a Name of contact person
Lora Haggard

6b Contact person's address
29 Briarwood Drive
Ringgold, GA 30736

7 Business address of organization (if different from mailing address shown above). Number, street, and room or suite number
1718 M Street, NW S342

City or town, state, and ZIP code
Washington, DC 20036

8 Type of report (check only one box)

- First quarterly report (due by April 15)
- Second quarterly report (due by July 15)
- Third quarterly report (due by October 15)
- Year-end report (due by January 31)
- Mid-year report (first election year only due by July 31)

- Monthly report for the month of: (due by the 20th day following the month shown above, except the December report, which is due by January 31)
- Pre-election report (due by the 12th or 15th day before the election)
 - (1) Type of election:
 - (2) Date of election:
 - (3) For the report:
- Post-election election report (due by the 15th day after general election)
 - (1) Date of election:
 - (2) For the report:

9 Total amount of reported contributions (total from all attached Schedules A).....\$ 11600

10 Total amount of reported expenditures (total from all attached Schedules B).....\$ 93286

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

Lora M. Haggard

07/15/2010

Sign Here

Signature of authorized official

Date

11044294650

Schedule A Itemized Contributions**Schedule A**

Contributor's name, mailing address and ZIP code John C. Windsor P.O. Box 4895 Jackson, MS 39296	Name of contributor's employer Self Employed Contributor's occupation Attorney Aggregate contributions year-to-date \$ 7500	Amount of contribution \$ 7500 Date of contribution 06/01/2010
Contributor's name, mailing address and ZIP code John R. Windsor 1313A Access Road Oxford, MS 38655	Name of contributor's employer Self Employed Contributor's occupation Attorney Aggregate contributions year-to-date \$ 7500	Amount of contribution \$ 7500 Date of contribution 06/01/2010
Contributor's name, mailing address and ZIP code Christopher D. Jones P.O. Box 250 Boonville, MS 38829	Name of contributor's employer Self Employed Contributor's occupation CPA Aggregate contributions year-to-date \$ 1500	Amount of contribution \$ 1500 Date of contribution 06/29/2010
Contributor's name, mailing address and ZIP code Democratic Governor's Association 1401 K Street, NW S200 Washington, DC 20005	Name of contributor's employer N/A Contributor's occupation N/A Aggregate contributions year-to-date \$ 100000	Amount of contribution \$ 100000 Date of contribution 04/07/2010

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Schedule B Itemized Expenditures

Schedule B

Recipient's name, mailing address and ZIP code
Three Point Media
1000 Polkovic Street, NW S300
Washington, DC 20007

Name of recipient's employer
N/A
Recipient's occupation
N/A

Amount of Expenditure
\$ 1911
Date of expenditure
04/12/2010

Purpose of expenditure
Media Production

Recipient's name, mailing address and ZIP code
LUC Media
25 Whitlock Place S201
Marietta, GA 30064

Name of recipient's employer
N/A
Recipient's occupation
N/A

Amount of Expenditure
\$ 76375
Date of expenditure
04/07/2010

Purpose of expenditure
Media Buy

Recipient's name, mailing address and ZIP code
Ourso Beycheik Johnson, Inc.
325 Napoleon Street
Baton Rouge, LA 70802

Name of recipient's employer
N/A
Recipient's occupation
N/A

Amount of Expenditure
\$ 15000
Date of expenditure
06/29/2010

Purpose of expenditure
Direct Mail

11044294652

Exhibit 6

Form **8872**
(November 2002)
Department of the Treasury
Internal Revenue Service

**Political Organization
Report of Contributions and Expenditures**

OMB No. 1545-1698

▶ See separate instructions.

A For the period beginning 07/01/2010 and ending 09/30/2010

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

1 Name of organization: Citizens for Strength and Security **Employer identification number**
26-3220209

2 Mailing address (P.O. box or number, street, and room or suite number)
1718 M Street, NW S342

City or town, state, and ZIP code
Washington, DC 20036

3 E-mail address of organization:
no@email

4 Date organization was formed:
08/22/2008

5a Name of custodian of records
Lora Haggard

5b Custodian's address
29 Briarwood Drive
Ringgold, GA 30736

6a Name of contact person
Lora Haggard

6b Contact person's address
29 Briarwood Drive
Ringgold, GA 30736

7 Business address of organization (if different from mailing address shown above). Number, street, and room or suite number
1718 M Street, NW S342

City or town, state, and ZIP code
Washington, DC 20036

8 Type of report (check only one box)

- First quarterly report (due by April 15)
- Second quarterly report (due by July 15)
- Third quarterly report (due by October 15)
- Year-end report (due by January 31)
- Mid-year report (first election year only due by July 31)

- Monthly report for the month of: (due by the 20th day following the month shown above, except the December report, which is due by January 31)
- Pre-election report (due by the 12th or 15th day before the election)
 - (1) Type of election:
 - (2) Date of election:
 - (3) For the state of:
- Post-general election report (due by the 30th day after general election)
 - (1) Date of election:
 - (2) For the state of:

9 Total amount of reported contributions (total from all attached Schedules A)..... **9. \$ 160500**

10 Total amount of reported expenditures (total from all attached Schedules B)..... **10. \$ 1554504**

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

Lora Haggard

10/15/2010

Sign Here

Signature of authorized official

Date

11044294653

Schedule A	Itemized Contributions	Schedule A
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Contributor's name, mailing address and ZIP code	Name of contributor's employer Contributor's occupation Aggregate contributions year-to-date	Amount of contribution Date of contribution
Brownstein Hyatt Farber Schreck 410 Seventeenth Street Suite 2280 Denver, CO 80202 - 4432	Brownstein Hyatt Farber Schreck Law Firm \$ 5000	\$ 5000 07/21/2010
Democratic Governors Association NF Corporate 1401 K Street, NW Suite 200 Washington, DC 20005	Democratic Governors Association NF Corporate Political Organization \$ 100000	\$ 100000 08/05/2010
Democratic Governors Association NF Corporate 1401 K Street, NW Suite 200 Washington, DC 20005	Democratic Governors Association NF Corporate Political Organization \$ 100000	\$ 100000 09/20/2010
American Federation of Teachers 555 New Jersey Ave., N.W. Washington, DC 20001	American Federation of Teachers Political Organization \$ 500000	\$ 500000 09/24/2010

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Schedule B Itemized Expenditures		Schedule B
Recipient's name, mailing address and ZIP code BB&T 8200 Greensboro Dr McLean, VA 22102	Name of recipient's employer BB&T Recipient's occupation Bank	Amount of Expenditure \$ 16 Date of expenditure 08/21/2010
Purpose of expenditure Bank Fees		
Recipient's name, mailing address and ZIP code BB&T 8200 Greensboro Dr McLean, VA 22102	Name of recipient's employer BB&T Recipient's occupation Bank	Amount of Expenditure \$ 28 Date of expenditure 07/21/2010
Purpose of expenditure Bank Fees		
Recipient's name, mailing address and ZIP code DMS, Inc. 4809 Morgan Drive Cherry Chase, MD 20815	Name of recipient's employer DMS, Inc. Recipient's occupation Research	Amount of Expenditure \$ 7500 Date of expenditure 09/09/2010
Purpose of expenditure Research		
Recipient's name, mailing address and ZIP code Azulone Liza Research, Inc. 260 Commerce Street 4th Floor Montgomery, AL 36184	Name of recipient's employer Azulone Liza Research, Inc. Recipient's occupation Research	Amount of Expenditure \$ 41500 Date of expenditure 08/15/2010
Purpose of expenditure Research		
Recipient's name, mailing address and ZIP code Lora Haggard 29 Briarwood Drive Ringgold, GA 30736	Name of recipient's employer Self Employed Recipient's occupation Compliance/Accounting	Amount of Expenditure \$ 3000 Date of expenditure 09/09/2010
Purpose of expenditure Accounting Fees		
Recipient's name, mailing address and ZIP code Waterfront Strategies 1010 Wisconsin Avenue, NW S800 Washington, DC 20007	Name of recipient's employer Waterfront Strategies Recipient's occupation Media Firm	Amount of Expenditure \$ 739008 Date of expenditure 09/20/2010
Purpose of expenditure Media		
Recipient's name, mailing address and ZIP code Waterfront Strategies 1010 Wisconsin Avenue, NW S800 Washington, DC 20007	Name of recipient's employer Waterfront Strategies Recipient's occupation Media Firm	Amount of Expenditure \$ 743460 Date of expenditure 09/24/2010
Purpose of expenditure Media		

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Exhibit 7

Form **8872**
(November 2002)

**Political Organization
Report of Contributions and Expenditures**

OMB No. 1545-1696

Department of the Treasury
Internal Revenue Service

▶ See separate instructions.

A. For the period beginning 10/01/2010 **and ending** 10/15/2010

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

1 Name of organization **Employer identification number**
Citizens for Strength and Security 26 - 3220209

2 Mailing address (E.O. box or number, street, and room or suite number)
1718 M Street, NW S342

City or town, state, and ZIP code
Washington, DC 20036

3 E-mail address of organization: no@email **4 Date organization was formed:** 09/22/2008

5a Name of custodian of records **5b Custodian's address**
Lora Haggard 29 Briarwood Drive
Ringgold, GA 30736

6a Name of contact person **6b Contact person's address**
Lora Haggard 29 Briarwood Drive
Ringgold, GA 30736

7 Business address of organization (if different from mailing address shown above). Number, street, and room or suite number
1718 M Street, NW S342
City or town, state, and ZIP code
Washington, DC 20036

8 Type of report (check only one box)

- First quarterly report (due by April 15)
- Second quarterly report (due by July 15)
- Third quarterly report (due by October 15)
- Year-end report (due by January 31)
- Mid-year report (November election year only - due by July 31)
- Monthly report for the month of: (due by the 20th day following the month shown above, except the December report, which is due by January 31)
- Pre-election report (due by the 12th or 15th day before the election)
 - (1) Type of election: general
 - (2) Date of election: 11/02/2010
 - (3) For the state of: NC
- Post-general election report (due by the 30th day after general election)
 - (1) Date of election:
 - (2) For the state of:

9 Total amount of reported contributions (total from all attached Schedules A)..... \$ 2825000

10 Total amount of reported expenditures (total from all attached Schedules B)..... \$ 854932

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

Lora M. Haggard

10/21/2010

Sign Here

Signature of authorized official

Date

11044294656

Schedule A Itemized Contributions		Schedule A
Contributor's name, mailing address and ZIP code Democratic Governor's Association 1401 K Street, NW S200 Washington, DC 20005	Name of contributor's employer N/A Contributor's occupation N/A Aggregate contributions year-to-date \$ 2700000	Amount of contribution \$ 500000 Date of contribution 10/01/2010
Contributor's name, mailing address and ZIP code Democratic Governor's Association 1401 K Street, NW S200 Washington, DC 20005	Name of contributor's employer N/A Contributor's occupation N/A Aggregate contributions year-to-date \$ 2700000	Amount of contribution \$ 500000 Date of contribution 10/01/2010
Contributor's name, mailing address and ZIP code Pharmaceutical Research & Manufacturers of America 950 F Street, NW S300 Washington, DC 20004	Name of contributor's employer N/A Contributor's occupation N/A Aggregate contributions year-to-date \$ 775000	Amount of contribution \$ 775000 Date of contribution 10/06/2010
Contributor's name, mailing address and ZIP code Democratic Governor's Association 1401 K Street, NW S200 Washington, DC 20005	Name of contributor's employer N/A Contributor's occupation N/A Aggregate contributions year-to-date \$ 2700000	Amount of contribution \$ 500000 Date of contribution 10/08/2010
Contributor's name, mailing address and ZIP code SEIU MD/DC State Council Ste 410, 3700 Koppers Street Baltimore, MD 21227	Name of contributor's employer N/A Contributor's occupation N/A Aggregate contributions year-to-date \$ 150000	Amount of contribution \$ 150000 Date of contribution 10/12/2010

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Schedule B **Itemized Expenditures** **Schedule B**

Recipient's name, mailing address and ZIP code Waterfront Strategies 1010 Wisconsin Avenue, NW S800 Washington, DC 20007	Name of recipient's employer N/A Recipient's occupation N/A	Amount of Expenditure \$ 798844 Date of expenditure 10/07/2010
Purpose of expenditure Media		

Recipient's name, mailing address and ZIP code Waterfront Strategies 1010 Wisconsin Avenue, NW S800 Washington, DC 20007	Name of recipient's employer N/A Recipient's occupation N/A	Amount of Expenditure \$ 56088 Date of expenditure 10/13/2010
Purpose of expenditure Media Production		

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