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FIRST GENERAL COUNSEL'S REPORT **SENSITIVE**

MUR: 6474, 6534

DATE COMPLAINT FILED: 6/13/2011

DATE OF NOTIFICATION: 6/16/2011

LAST RESPONSE RECEIVED: 4/16/2012

DATE ACTIVATED: 6/8/2012

EXPIRATION OF SOL: 01/01/2016 to 04/06/2016

COMPLAINANT:

Ohio Democratic Party
Chris Redfern, Chairman

RESPONDENTS:

Josh Mandel
Citizens for Josh Mandel and Kathryn D. Kessler in
her official capacity as treasurer
Citizens for Josh Mandel (State) Committee
State of Ohio

RELEVANT STATUTES:

2 U.S.C. § 431(11)
2 U.S.C. § 441a(a)
2 U.S.C. § 441a(f)
2 U.S.C. § 441i(e)
11 C.F.R. § 100.72(a)
11 C.F.R. § 100.131(a)
11 C.F.R. § 110.3(d)

INTERNAL REPORTS CHECKED:

Disclosure Reports

I. INTRODUCTION

The Complaints in these matters allege that Josh Mandel, the State Treasurer of Ohio and a Republican candidate for the U.S. Senate in the November 2012 general election, used resources from his state campaign as well as resources under his control as State Treasurer to support his federal campaign. Specifically, the Complaint in MUR 6474 alleges that Josh Mandel and Citizens for Josh Mandel and Kathryn D. Kessler in her official capacity as treasurer

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1 (the "Federal Committee") used funds of Citizens for Josh Mandel (State) Committee (the "State
2 Committee") to purchase assets that were transferred to the Federal Committee and used state
3 government assets under Mandel's control as State Treasurer to benefit the Federal Committee.
4 These assets include an email list, a website domain name, and certain press releases that
5 contained content virtually identical to materials on the official website of the Office of the State
6 Treasurer. The Complaint in MUR 6474 alleges that use of such assets violated 2 U.S.C.
7 §§ 441a(f) and 441i(e) and 11 C.F.R. § 110.3(d). The same Complainant alleges in MUR 6534
8 that the State Committee improperly paid for Mandel's trips to three other states that the
9 Complainant alleges were testing the waters or direct fund-raising efforts for Mandel's
10 subsequent federal campaign, in violation of 2 U.S.C. § 441a and 11 C.F.R. §§ 100.72(a) and
11 110.3(d).

12 Mandel, the Federal Committee, the State Committee, and the State of Ohio filed
13 responses denying that they violated the Federal Election Campaign Act of 1971, as amended
14 (the "Act"). In MUR 6474, the Responses of Mandel, the Federal Committee, and the State
15 Committee ("Citizens for Josh Mandel Resp.") assert that, although the Federal Committee did
16 receive or make use of certain assets of the State Committee, those activities complied with the
17 Act and Commission regulations. The Responses further provide specific information
18 supporting their position that the Federal Committee made no unlawful use of State Committee
19 or state government resources.

20 In light of the specific information provided by the Respondents and the speculative
21 nature of the allegations in the Complaints, we recommend that the Commission find no reason
22 to believe that Respondents violated the Act and Commission regulations and close the file.

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II. FACTUAL AND LEGAL ANALYSIS

A. Factual Background

Josh Mandel was elected State Treasurer of Ohio on November 2, 2010. Mandel is also a Republican candidate for the U.S. Senate seat in Ohio in the November 2012 general election. He filed his Statement of Candidacy for the U.S. Senate with the Commission on April 6, 2011. Mandel does not appear to be running for re-election for the office of State Treasurer at this time, as his four-year term is not due to expire until November 2014.

In these two matters, the same Complainant — the Ohio Democratic Party (the ODP) — alleges that the Federal Committee and Mandel violated the Act by impermissibly using resources of the State Committee and the State of Ohio to support Mandel's Federal Committee. ODP alleges that the Federal Committee accepted a prohibited transfer from the State Committee in violation of 11 C.F.R. § 110.3(d) in three different ways.

First, ODP alleges that the Federal Committee obtained an email list from the State Committee "presumably . . . without cost," Compl. at 2, MUR 6474, and "appears to be utilizing the email list . . . without paying for its use." *Id.* at 4.

Second, ODP claims that the Federal Committee has been using the State Committee's website, www.joshmandel.com, and "has taken over the domain name at no apparent cost." *Id.* at 2. The Complaint argues that while the State Committee paid for the creation and development of the website, as soon as Mandel announced his federal candidacy, the Federal Committee used the website to promote his federal campaign without paying for its use. *Id.* at 4.

Third, ODP claims that the Federal Committee used funds from the State Committee to pay for trips that were part of Mandel's testing the waters activities for his Senate campaign. Compl. at 2, MUR 6534. As support for its claim, ODP argues that after one month into his

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1 four-year term as Treasurer, Mandel began emptying his State Committee account, spending
2 over \$25,000 in a six month period from December 2010 to June 2011. *Id.* ODP further argues
3 that Mandel spent much of this amount immediately before he established the Federal
4 Committee in April 2011. *Id.* In particular, the complaint claims that Mandel spent over \$8,000
5 on trips to Utah, New York, and Washington, D.C. for "political meetings" apparently in support
6 of his Senate campaign in light of the fact that Mandel received over \$200,000 in contributions
7 from contributors in those cities within days of registering with the Commission. *Id.* at 3.
8 According to the Complaint, Mandel took a total of 10 trips in the weeks immediately before he
9 filed his Statement of Candidacy for the Senate race on April 6, 2011. *Id.* Since declaring his
10 federal candidacy, ODP argues that, for the remainder of the year, Mandel has made no
11 expenditures from the State Committee's account. *Id.* at 2.

12 The Respondents deny the State Committee improperly transferred funds to the Federal
13 Committee. They contend that the Federal Committee engaged in arm's length transactions with
14 the State Committee and paid appropriate compensation for the use of the State Committee's
15 email list and the Federal Committee's website. Citizens for Josh Mandel Resp. at 2-3, MUR
16 6474. Respondents further argue that the trips to New York, Washington, D.C., and Utah were
17 wholly unrelated to Mandel's later decision to run for a seat in the U.S. Senate. Response of
18 State Committee Resp. ("State Committee Resp.") at 2-4, MUR 6534; Response of Josh Mandel
19 and Federal Committee ("Federal Committee Resp.") at 2-4, MUR 6534.¹ Respondents contend
20 that the mere fact that the Federal Committee accepted contributions from contributors in those
21 cities does not prove that Mandel engaged in fundraising for his federal campaign during those

¹ The State Committee further asserts that it was not specifically identified by the complainant as a respondent in MUR 6534 and should therefore be dismissed from the matter. *Id.* at 1. Because the Complaint alleges conduct of the State Committee that could constitute a violation of the Act, 2 U.S.C. § 441a, the State Committee was appropriately named as a Respondent and provided notice and opportunity to respond.

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trips. State Committee Resp. at 4-5, MUR 6534; Citizens for Josh Mandel Resp. at 4, MUR 6474.

In addition to the allegations relating to the improper transfer of non-federal funds and assets, ODP alleges that the Federal Committee accepted a prohibited or excessive in-kind contribution from the State of Ohio by using resources of the Office of State Treasurer. Compl. at 5, MUR 6474. ODP specifically claims that Mandel, as State Treasurer, has apparently been using his office to conduct research and draft releases trumpeting his accomplishments, which were then posted on the Federal Committee's website and Mandel's Facebook page and emailed to the State Committee's email list. Compl. at 2.

The Respondents also deny that the Federal Committee accepted a prohibited contribution from the State of Ohio. *See* Citizens for Josh Mandel Resp. at 3, MUR 6474; State of Ohio Resp. Mandel and the Federal Committee assert that the material from the Office of the State Treasurer posted on Mandel's campaign website was not created using state government resources but by individuals on their own personal time and, in any event, the materials posted were not political. Citizens for Josh Mandel Resp. at 3-5, MUR 6474. The State of Ohio argues that it should not have been generated as a respondent and denies that it made an in-kind contribution to the Federal Committee. State of Ohio Resp. (citing MUR 6272 (DeVore)).

B. Legal Analysis

We conclude that there is no reason to believe any of the allegations advanced by ODP constitute a violation of the Act. We address each allegation in turn below.

1. Email List Exchange Agreement

ODP alleges that the Federal Committee accepted an improper transfer from the State Committee by using the State Committee's email list without payment. The Respondents assert

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1 that the Federal Committee and State Committee "engaged in an arm's length business
2 transaction where the State Campaign has provided its email list to the U.S. Senate Campaign in
3 exchange for the future use of the U.S. Senate Campaign's updated list of a corresponding
4 number of names of equal value." Citizens for Josh Mandel Resp. at 2, MUR 6474. For this
5 reason, the Respondents urge that the arrangement is consistent with the Commission's
6 regulations and prior advisory opinions. *Id.*

7 Federal candidates and officeholders, or entities directly or indirectly established,
8 financed, maintained or controlled by them, are prohibited from soliciting, receiving, directing,
9 transferring, or spending funds that do not comply with the limitations and prohibitions of the
10 Act. 2 U.S.C. § 441i(e)(1)(A). In addition, section 110.3(d) of the Commission's regulations
11 provides, in material part, that transfers of funds or assets from a candidate's campaign account
12 for a non-federal election to his or her principal campaign committee for a federal election are
13 prohibited. 11 C.F.R. § 110.3(d). The Commission, however, has permitted the transfer of a
14 non-federal committee's assets to the campaign account of a candidate for federal office where
15 "those assets are sold at fair market value." Explanation and Justification: Transfer of Funds
16 from State to Federal Campaigns, 58 Fed. Reg. 3474, 3475 (Jan. 8, 1993); see Statement of
17 Reasons at 5, Comm'rs Petersen, Bauerly, Hunter, McGahn, and Weintraub, MUR 6216
18 (Coakley for Senate) (Sept. 8, 2010).

19 The Commission has previously addressed agreements to exchange mailing lists,
20 including executory contracts that anticipate future performance, as here. In Advisory Opinion
21 1981-46 (Dellums), the Commission concluded that an agreement to a future exchange of an
22 updated direct mail list "of a corresponding number of names of equal value" does not create a
23 reportable contribution. The Commission explained that,

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1 based on the assertion [of the Requestor] that this kind of exchange is an
2 accepted practice in the field of direct mail fundraising, . . . when the
3 Committee provides names to another political committee in exchange for
4 its own future use of a corresponding number of names which are of equal
5 value, this constitutes an arm's length business transaction between the
6 committees and is not a reportable contributions under the Act. Of course,
7 this conclusion assumes the fact that the future use will occur.

8 Advisory Op. 1981-46 at 2. Similarly, the Commission endorsed a proposed exchange of
9 mailing lists in Advisory Opinion 2002-14 (Libertarian Nat'l Comm.). There, the Commission
10 found that the Libertarian National Committee could exchange its mailing list or portions of it
11 with any outside organization without giving rise to a reportable contribution, so long as the lists
12 or portions exchanged were of equal value.²

13 Those Advisory Opinions involved direct mailing lists, not lists of email addresses. But
14 this, in our view, is a distinction without a difference. The type of address contained in the
15 mailing list — whether a physical address or electronic — does not alter the legal analysis. The
16 question remains whether a candidate's authorized committee provided fair market value for its
17 use of the asset. So long as the Federal Committee provided equally valuable consideration for
18 its use of the State Committee's email list, the Act and regulations are satisfied.

19 The Respondents in this case state that their agreement was entered into at arm's length,
20 and that the Federal Committee will provide a "corresponding number of names of equal value"
21 in the future. The Commission has approved as consideration the use of a list exchange
22 agreement that contemplated a future exchange. No information in the record contradicts the
23 Respondent's claimed intent to make the exchange or suggests that the future email list would

² After approving a Notice of Proposed Rule Making on mailing list exchanges, 68 Fed. Reg. 52,531 (Sept. 4, 2003), the Commission concluded that further regulation was unnecessary, as comments and testimony received indicated that the "regulated community does not perceive a need for further regulation of political committee mailing list transactions." 68 Fed. Reg. 64,572 (Nov. 14, 2003). The Commission further noted that AO 2002-14 provided "clear enough guidance on the conditions under which the proceeds from the sale or rental of mailing lists are not considered contributions to the political committee." *Id.* at 64,572.

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1 not be of comparable value. Further, the allegation of the Complaint — that the Federal
2 Committee “presumably” failed to provide adequate consideration — is mere speculation. Given
3 the absence of any indication that the Federal Committee has provided the State Committee with
4 less than fair market value for the use of the State Committee email address list, we recommend
5 that the Commission find no reason to believe that Josh Mandel, the Federal Committee, and the
6 State Committee violated 2 U.S.C. § 441i(e)(1)(A) and 11 C.F.R. § 110.3(d) as a result of the
7 Federal Committee’s use of the State Committee email list. See Statement of Reasons at 6, MUR
8 6216 (“Because there is no information to suggest that the amount paid by the Federal
9 Committee for the assets was not fair market value... there is no reason to believe the Coakley
10 (State) Committee violated the Act or Commission regulations with respect to the asset sale
11 agreement”).

12 2. Use of Website Domain Name

13 The Complainant also alleges that the Federal Committee “has taken over the domain
14 name www.joshmandel.com [from the State Committee] at no apparent cost.” Compl. at 2, MUR
15 6474. The Respondents assert that when Mandel decided to run for U.S. Senate, the Federal
16 Committee hired Emotive, a web-hosting company, to coordinate an arm’s length deal to take
17 over www.joshmandel.com from New Media Campaigns, the State Committee’s web-hosting
18 company. The Respondents assert that the deal was “done for fair market value and in
19 accordance with industry standards.” Citizens for Josh Mandel Resp. at 3, MUR 6474. The
20 Federal Committee’s July 2011 Quarterly Report shows disbursements to EMotive on April 27
21 for \$4,087.50 and May 28 for \$3,322.50 for “website development.” Citizen’s for Josh Mandel,
22 July 2011 Quarterly Report.

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As noted, asset transfers from a candidate's state campaign committee to the candidate's federal campaign committee are generally prohibited, unless the federal committee pays the fair market value for the asset. See 2 U.S.C. § 441i(e); 11 C.F.R. § 110.3(d); 58 Fed. Reg. at 3475. Respondents claim that the State Committee transferred www.joshmandel.com for fair market value to the Federal Committee, disclosure reports filed with the Commission tend to support that assertion, and the Complaint and publicly available information at our disposal provide no basis to conclude that the purchase of the domain name was for less than its fair market value. Therefore, we recommend that the Commission find no reason to believe that Josh Mandel, the Federal Committee, and the State Committee violated 2 U.S.C. § 441i(e)(1)(A) and 11 C.F.R. § 110.3(d) as a result of the Federal Committee's use of a website domain name obtained from the State Committee.

3. Use of State Committee Funds for Federal Campaign Travel

The Complaint in MUR 6534 alleges that Mandel's State Committee made an excessive contribution and improper transfer to Mandel and his Federal Committee by paying for trips that Mandel took outside of Ohio for the purpose of "testing the waters and drumming up support for his Senate campaign." Compl. at 1-2, MUR 6534.³ ODP alleges that, based upon the manner in which Mandel virtually emptied his State Committee account before declaring his federal candidacy and the subsequent receipt of contributions received from certain out-of-state locations, Mandel used State Committee funds for trips to further his federal candidacy. *Id.* This allegation is not supported by sufficient record evidence to justify a reason to believe finding.

³ An individual who has not yet decided to run for office may "test the waters" in advance of candidacy by raising and spending funds while making that decision. 11 C.F.R. §§ 100.72; 100.131. These funds may be raised and used for the limited purpose of determining whether an individual should become a candidate. *Id.* So long as the individual is "testing the waters," he or she is not required to file a statement of candidacy pursuant to 2 U.S.C. § 432(e)(1). The "testing the waters" exception does not apply, however, when an individual raises or spends more than \$5,000 for "activities indicating that an individual has decided to become a candidate for a particular office or for activities relevant to conducting a campaign." 11 C.F.R. §§ 100.72(b); 100.131(b).

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For the 2012 election cycle, the Act prohibits a person from making a contribution to any candidate or his authorized political committee with respect to a federal election, which in the aggregate, exceeds \$2,500. *See* 2 U.S.C. § 441a(a)(1)(A). Moreover, no candidate or political committee shall knowingly accept an excessive contribution. 2 U.S.C. § 441a(f). Although funds received solely for the purpose of determining whether an individual should become a candidate are not contributions, only funds permissible under the Act may be used for testing the water activities, and once an individual subsequently becomes a candidate, such funds received are treated as contributions and must be reported. 11 C.F.R. § 100.72(a).

The Respondents deny that the State Committee funds that were used to pay for Mandel's out-of-state trips were for the purpose of testing the waters for Mandel's future Senate campaign. The Respondents assert that the trips were part of Mandel's official travel as State Treasurer and involved official business meetings to discuss Treasurer-related issues. Mandel and Federal Committee Resp. at 2-3, MUR 6534; State Committee Resp. at 3-4, MUR 6534. The Respondents specifically identify the purpose of each trip at issue and describe generally the activities Mandel engaged in during each trip. Specifically, these trips included: (1) a National Association of State Treasurers meeting in Washington, D.C.; (2) a pension policy meeting in New York; and (3) a non-partisan leadership retreat in Utah. *Id.*⁴

Based upon a review of the State Committee's disclosure reports filed with the Ohio Secretary of State, this Office has determined that the State Committee spent \$25,877.69 from December 10, 2010, through June 30, 2011, with a balance of \$218.92 remaining. *See* Citizens for Josh Mandel Semiannual Report (July 2011), filed with Ohio Secretary of State, Attach. C.

⁴ The Respondents admit that the State Committee used its funds to pay the cost of the trips, and that the travel, though predominantly for official state business, was not funded by the state. Respondents contend that, in an abundance of caution and consistent with Ohio law, Mandel consistently used State Committee funds to pay costs associated with any activities that arguably might be construed as involving state-related political activities. Federal Committee Resp. at 3-4, MUR 6534; State Committee Resp. at 3, MUR 6534. We do not here consider the application of Ohio state law to these facts.

1 \$20,291.67 of the State Committee's expenditures was spent from February 1, 2011, through
2 April 6, 2011, the day that Mandel announced his federal candidacy. *Id.* Between February
3 2011 and March 2011, Mandel booked nine flights with airlines, but state records do not indicate
4 the date for the actual travel. *Id.* With respect to contributions, the State Committee raised
5 \$4,895.00 from December 10, 2010, through March 18, 2011, *id.*, and has not raised any funds
6 since March 2011. *Id.*; Annual Report (Jan. 2012), Attach. D; Semiannual Report (July 2012),
7 Attach. E.

8 Despite the timing of these activities, the Complaint's suggestion that State Committee
9 funds were used to fund testing the waters or direct federal campaign activity during the
10 challenged travel is not adequately supported by the factual record. The mere temporal
11 proximity of travel with later federal contributions is inadequate, without more, to draw a
12 reasonable inference that the trips involved either testing the waters or federal campaign activity.
13 Further, the Respondents specifically deny the Complainant's factual inference and describe the
14 purpose of each trip, none of which appears to have included federal campaign or testing the
15 waters activity.

16 We therefore recommend that the Commission find no reason to believe that the State
17 Committee violated 2 U.S.C. § 441a(a)(1)(A) by making an excessive contribution. In addition,
18 we recommend that the Commission find no reason to believe that Josh Mandel and the Federal
19 Committee violated 2 U.S.C. § 441a(f) and 11 C.F.R. § 100.72 by accepting an excessive
20 contribution while testing the waters for Mandel's U.S. Senate campaign. Finally, we
21 recommend that the Commission find no reason to believe that Mandel, the State Committee,
22 and the Federal Committee violated 2 U.S.C. § 441i(e) and 11 C.F.R. § 110.3(d) based upon the
23 State Committee's alleged payment of Mandel's out-of-state trips.

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4. Use of Ohio State Treasurer's Materials

Finally, the Complaint in MUR 6474 alleges that the Federal Committee has posted a press release prepared by the Ohio State Treasurer's Office on www.joshmandel.com and, therefore, the State of Ohio has made excessive or prohibited in-kind contributions to the Federal Committee. Compl. at 5-6, MUR 6474. In particular, the Complainant identifies a single document entitled "Treasurer's Office Update" on the Federal Committee's website and the virtually identical "E-Newsletter Update from Treasurer Mandel" on the State Treasurer's Office official website. *See id.*

The Act defines a person to include "an individual, partnership, committee, association, corporation, or any other organization or group of persons, but such term does not include the Federal Government or any authority of the Federal Government." 2 U.S.C. § 431(11). The Commission has determined that a State government is a "person" under the Act. *See, e.g.,* Advisory Opinion 1999-7 (State of Minnesota) at 2 n.3. Accordingly, if the Federal Committee used resources of the Ohio State Treasurer's Office without payment, the Federal Committee may have accepted an excessive in-kind contribution from the State of Ohio in violation of 2 U.S.C. § 441a(a)(1)(A).

The assertion in the Complaint that state employees created and developed content to benefit the Federal Committee is premised on the fact that the E-Newsletter Update displayed on the website of the Office of the State Treasurer was also displayed on the website of the Federal Committee. Respondents explicitly reject this assertion, contending that the E-Newsletter Update referenced in the Complaint was created without using any state government resources. Citizens for Josh Mandel Resp. at 4, MUR 6474. Rather, the information on the Federal Committee's website was created "by individuals on their personal time, and outside the official

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1 duties of the Treasurer's office, and merely posted on both the official Treasurer's website and
2 the U.S. Senate Campaign's website." *Id.* Accordingly, we conclude that the E-Newsletter
3 Update does not constitute a contribution by the state government because there is no indication
4 that state government funds were involved.⁵ For these reasons, we recommend that the
5 Commission find no reason to believe that the State of Ohio violated 2 U.S.C. § 441a(a)(1) by
6 making, or that Mandel and the Federal Committee violated 2 U.S.C. § 441a(f) by accepting, an
7 excessive in-kind contribution.

8 **III. RECOMMENDATIONS**

- 9 1. Find no reason to believe that Josh Mandel violated 2 U.S.C. §§ 441a(f),
10 441i(e)(1)(A), and 11 C.F.R. §§ 110.3(d), 100.72(a).
11
12 2. Find no reason to believe that Citizens for Josh Mandel (Federal) Committee and
13 Kathryn D. Kessler in her official capacity as treasurer violated 2 U.S.C.
14 §§ 441a(f), 441i(e)(1)(A), and 11 C.F.R. §§ 110.3(d), 100.72(a).
15
16 3. Find no reason to believe that Citizens for Josh Mandel (State) Committee and
17 Kathryn D. Kessler in her official capacity as treasurer violated 2 U.S.C.
18 § 441a(a)(1)(A) and 11 C.F.R. § 110.3(d).
19
20 4. Find no reason to believe that the State of Ohio violated 2 U.S.C. § 441a(a)(1)(A).
21
22 5. Approve the attached Factual and Legal Analyses;
23
6. Approve the appropriate letters; and

⁵ The Complaint in MUR 6474 alleges that the use of State Committee resources with respect to the two websites constitutes a violation. Compl. at 5-6. There is no indication in the Complaint, nor any reason to infer, that State Committee resources were used in connection with the placement of the press release on the websites of the Federal Committee and the Office of the State Treasurer.

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7. Close the file.

Anthony Herman
General Counsel

9/6/12
Date

BY:

Daniel A. Petalas
Associate General Counsel for Enforcement

Sada Manickam
Sada Manickam
Attorney

Attachments

- C. Citizens for Josh Mandel Semiannual Report (July 2011)
- D. Citizens for Josh Mandel Annual Report (Jan. 2012)
- E. Citizens for Josh Mandel Semiannual Report (July 2012)

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Jon Husted
Ohio Secretary

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Cover Page Details

Committee Name	CITIZENS FOR JOSH MANDEL
Report Type	SEMIANNUAL (JULY)
Report Year	2011
Line(1) Amount Forward	\$13,549.52
Report Filed Date	07/29/2011
Line(2) Total Contribution Received	\$4,895.00
Line(3) Total Other Income	\$7,652.09
Line(5) Total Expenditures	\$25,877.69
Line(6) Balance On Hand	\$218.92
Inkind Contribution Made	\$0.00
Inkind Contribution Received	\$0.00
Outstanding Debts Owed By Committee	\$0.00
Outstanding Loans Owed By Committee	\$0.00
Outstanding Loans Owed To Committee	\$0.00
Independent Expenditures Made	\$0.00
Total Ohio Receipts	\$0.00

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Cover Page Details

Committee Name	CITIZENS FOR JOSH MANDEL
Report Type	ANNUAL (JANUARY)
Report Year	2011
Line(1) Amount Forward	\$218.92
Report Filed Date	01/31/2012
Line(2) Total Contribution Received	\$0.00
Line(3) Total Other Income	\$0.00
Line(5) Total Expenditures	\$0.00
Line(6) Balance On Hand	\$218.92
Inkind Contribution Made	\$0.00
Inkind Contribution Received	\$0.00
Outstanding Debts Owed By Committee	\$0.00
Outstanding Loans Owed By Committee	\$0.00
Outstanding Loans Owed To Committee	\$0.00
Independent Expenditures Made	\$0.00
Total Ohio Receipts	\$0.00

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Cover Page Details

Committee Name	CITIZENS FOR JOSH MANDEL
Report Type	SEMIANNUAL (JULY)
Report Year	2012
Line(1) Amount Forward	\$218.92
Report Filed Date	07/31/2012
Line(2) Total Contribution Received	\$0.00
Line(3) Total Other Income	\$0.00
Line(5) Total Expenditures	\$0.00
Line(6) Balance On Hand	\$218.92
Inkind Contribution Made	\$0.00
Inkind Contribution Received	\$0.00
Outstanding Debts Owed By Committee	\$0.00
Outstanding Loans Owed By Committee	\$0.00
Outstanding Loans Owed To Committee	\$0.00
Independent Expenditures Made	\$0.00
Total Ohio Receipts	\$0.00

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ATTACHMENT E

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