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BEFORE THE  
FEDERAL ELECTION COMMISSION

2015 SEP 28 PM 9:42

American Democracy Legal Fund  
455 Massachusetts Avenue, N.W.  
Washington, D.C. 20001,

CELA

Complainant,

v.

MUR # 6915

Mr. John Ellis "Jeb" Bush  
P.O. Box 440669  
Miami, FL 33144,

Jeb 2016, Inc. and William Simon, Treasurer  
P.O. Box 440669  
Miami, FL 33144,

Right to Rise USA and Charles Spies, Treasurer,  
6230 Wilshire Blvd. #1790  
Los Angeles, CA 90048,

Right to Rise PAC, Inc. and James Robinson, Treasurer,  
2475 Brickell Ave. # 2009  
Miami, FL 33129,

Respondents.

*Amendment*  
COMPLAINT

Complainant files this complaint under 52 U.S.C. § 30109(a)(1) against Mr. John Ellis "Jeb" Bush; his principal campaign committee, Jeb 2016, Inc. and its treasurer in his official capacity; Right to Rise USA and its treasurer in his official capacity; and Right to Rise PAC, Inc. and its treasurer in his official capacity (collectively, "Respondents") for violating the Federal Election Campaign Act of 1971, as amended ("the Act") and Federal Election Commission (the "Commission") regulations, as described below.

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COUNSEL

## A. FACTS

Mr. Bush declared his candidacy for president on June 15, 2015, filing his statement of candidacy with the Commission that same day.<sup>1</sup> His principal campaign committee (hereinafter the “Campaign”) is Jeb 2016, Inc.<sup>2</sup> Right to Rise USA (hereinafter the “Super PAC”) is an independent expenditure-only committee or Super PAC organized to support Mr. Bush’s federal candidacy.<sup>3</sup> Right to Rise PAC, Inc. (hereinafter the “Leadership PAC”) is a multicandidate political committee that is established, financed, maintained, or controlled by Mr. Bush.<sup>4</sup>

Mr. Bush began testing the waters for a campaign as early as May 23, 2014,<sup>5</sup> nearly eight months before the formation of his Super PAC and Leadership PAC on January 6, 2015.<sup>6</sup> He tested the waters until, at the very latest, he formally announced his candidacy on June 15, 2015. During this period, as explained below, the Super PAC and Leadership PAC each spent thousands of dollars on activities that may have been for testing-the-waters purposes. These payments have not been reimbursed by Mr. Bush or the Campaign.

**Super PAC Expenditures.** According to media reports and FEC filings, the Super PAC spent thousands of dollars on activities that may have been for the purpose of allowing Mr. Bush

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<sup>1</sup> Michael Barbaro and Jonathan Martin, *Jeb Bush Announces White House Bid, Saying ‘America Deserves Better’*, N.Y. Times (June 15, 2015), available at [http://www.nytimes.com/2015/06/16/us/politics/jeb-bush-presidential-campaign.html?\\_r=0](http://www.nytimes.com/2015/06/16/us/politics/jeb-bush-presidential-campaign.html?_r=0); FEC Form 2, Statement of Candidacy, Jeb Bush (June 15, 2015).

<sup>2</sup> FEC Form 2, Statement of Candidacy, Jeb Bush (June 15, 2015).

<sup>3</sup> See FEC Form 1, Statement of Organization, Right to Rise USA (June 12, 2015); Right to Rise USA, available at <https://righttorisesuperpac.org/#/home?lang=en> (“Right to Rise USA is the leading independent super PAC supporting Jeb Bush’s campaign for President.”).

<sup>4</sup> See FEC Form 1, Statement of Organization (amended), Right to Rise PAC, Inc. (Jan. 16, 2015). Though the FEC form does not report its status as a leadership PAC, Mr. Bush has himself referred to the organization as a leadership PAC. Jose A. DelReal, *Jeb Bush Forms PAC to Explore Presidential Run*, THE WASHINGTON POST (Dec. 16, 2014); available at <http://www.washingtonpost.com/news/post-politics/wp/2014/12/16/jeb-bush-forms-pac-to-explore-presidential-run/>; see Robert Costa, *Jeb Bush and His Allies Form Leadership PAC and Super PAC, Both Dubbed Right to Rise*, THE WASHINGTON POST (Jan. 6, 2015), available at <http://www.washingtonpost.com/news/post-politics/wp/2015/01/06/jeb-bush-forms-new-pac-right-to-rise/>.

<sup>5</sup> FEC July Quarterly Report, Jeb., Inc. (July 15, 2015) (recording payment of \$1,875 from Jeb Bush to Jeb 2016, Inc. for “In Kind (Testing the Waters) Communications Consulting,” through Kristy Campbell).

<sup>6</sup> See FEC Form 1, Statement of Organization, Right to Rise PAC, Inc. (Jan. 6, 2015); FEC Form 1, Statement of Organization, Right to Rise USA (Jan. 6, 2015).

to test the waters. The categories of these expenditures include, but are not limited to, travel, rent, communications consulting, and even payments to current employees of the Campaign.

*Travel.* The Super PAC's Mid-Year 2015 report reflects that it spent over \$200,000 on travel during the testing-the-waters period.<sup>7</sup> For example, the Super PAC reported two expenditures (\$420 and \$403) at the Biltmore Hotel in Coral Gables, Florida on March 8, 2015, one day before a Bush fundraiser in that city.<sup>8</sup> The Super PAC also reported an expenditure (\$889) on May 15, 2015, to the Duke Mansion in Charlotte, North Carolina, and Mr. Bush met with donors in Charlotte on May 1, 2015.<sup>9</sup> To give one final example, Mr. Bush spoke at the Henry Ford Academy in Michigan on May 29, 2015,<sup>10</sup> and on June 2 the Super PAC reported an expenditure of \$242 to the Marriott in Grand Rapids, Michigan, for travel.

*Rent.* The Super PAC made a rent payment of \$3,957, reported as May 31, 2015, to Hoffman Flagler LLC. This is the same company to which the Campaign is paying for his Florida offices.<sup>11</sup>

*Communications consulting.* The Super PAC reported an expenditure of \$55,989 on May 18, 2015, to FP1 Strategies for "communications consulting." FP1 Strategies was founded by Mr. Bush's eventual campaign manager, Danny Diaz.<sup>12</sup>

*Payments to current employees of the Campaign.* Two individuals who are on the payroll of the campaign, Brandon Doyle and Salvatore Purpura,<sup>13</sup> were paid by the Super PAC for

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<sup>7</sup> FEC Mid-Year Report (amended), Right to Rise USA (Aug. 7, 2015).

<sup>8</sup> Patricia Mazzei, *Big Donors Lined Up for Jeb Bush PAC Fundraiser in Coral Gables*, TAMPA BAY TIMES (Feb. 24, 2015), available at <http://www.tampabay.com/blogs/the-buzz-florida-politics/big-donors-lined-up-for-jeb-bush-pac-fundraiser-in-coral-gables/2218868>.

<sup>9</sup> J. Andrew Curliss, *Jeb Bush to stop in Raleigh, Charlotte on Friday*, THE NEWS & OBSERVER (Apr. 29, 2015), available at <http://www.newsobserver.com/news/politics-government/politics-columns-blogs/under-the-dome/article19868610.html#>.

<sup>10</sup> Jeb Bush Tweet, May 29, 2015, available at <https://mobile.twitter.com/JebBush/status/604318609742127104>.

<sup>11</sup> FEC July Quarterly Report, Jeb 2016, Inc.

<sup>12</sup> Alex Leary, *In Campaign Shakeup, Jeb Bush Names New Campaign Manager*, TAMPA BAY TIMES (June 8, 2015), available at <http://www.tampabay.com/blogs/the-buzz-florida-politics/jeb-bush-names-a-campaign-manager-and-shifts-another-top-staffer-to-focus/2232795>.

various reasons: the Super PAC recorded an expense on May 5, 2015, to Mr. Doyle for “equip purchase,” and on May 22, 2015, for “postage;” and five entries reflect payments to Mr. Purpura for “compliance consulting,” totaling over \$25,000.<sup>14</sup>

None of these payments, though made during the testing-the-waters period and likely supporting Mr. Bush and his agents during that period, have been reimbursed by Mr. Bush or the Campaign.

**Leadership PAC Expenditures.** According to the Leadership PAC’s July 2015 report,<sup>15</sup> it made nearly 50 expenditures for consulting services – including services for financing, communications, websites, politics, logistics, research, etc. – totaling over \$700,000. Moreover, the Leadership PAC spent over \$175,000 on vendor services through 10 separate expenditures. These vendor services included payments for database management, facility rental, and catering. A full account of these expenditures for consulting and vendor services is attached as Exhibit A. Though these payments were all made while Mr. Bush was testing the waters and likely supported Mr. Bush and his agents’ activities during that period, none of these payments has been reimbursed by Mr. Bush or the Campaign.<sup>16</sup>

## B. LEGAL ARGUMENT

### 1. Mr. Bush and the Super PAC may have violated the Act by using Super PAC funds to finance exploratory activities.

Under the Act, an individual becomes a candidate for federal office (thus triggering registration and reporting requirements) when his or her campaign either receives in excess of

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<sup>13</sup> FEC July Quarterly Report, Jeb. 2016, Inc. (July 15, 2015).

<sup>14</sup> FEC Mid-Year Report (amended), Right to Rise USA (Aug. 7, 2015) (recording a payment of \$3,687 on January 31, 2015, \$4,375 on March 2, 2015, \$5,724 on April 3, 2015, \$5,500 on May 7, 2015, and \$7,343 on May 31, 2015).

<sup>15</sup> FEC Mid-Year Report (amended), Right to Rise PAC, Inc. (July 31, 2015).

<sup>16</sup> In fact, the only two reimbursements reported by the Campaign to the Leadership PAC are for “repayment - rent deposit” and for “repayment - rent/equipment/purchase/computer/office supply purchase.”

\$5,000 in contributions or makes in excess of \$5,000 in expenditures.<sup>17</sup> There is an exception for amounts raised and spent while an individual is “testing the waters” in order to decide whether to become a candidate; federal regulations provide that the terms “contribution” and “expenditure” do not include funds received or payments made solely to determine whether an individual should become a candidate.<sup>18</sup> But this exception is limited in a key way: “[o]nly funds permissible under the Act may be used for such activities.”<sup>19</sup> Once the individual becomes a candidate, payments count as contributions to the candidate and must be reported as such.<sup>20</sup>

The Super PAC raises funds outside of the Act’s limits and source restrictions. If any of its payments financed Mr. Bush or his agents to test the waters, the Super PAC provided – and Bush accepted – impermissible contributions. “Testing the waters” includes any activities conducted to determine whether an individual should become a candidate, including, without limitation, conducting a poll, telephone calls, and travel.<sup>21</sup> It is clear that Mr. Bush began testing the waters well before the Super PAC was formed, and the Super PAC made several expenditures that fall under the umbrella activity that traditionally means to test the waters.

Regarding travel, for example, the Super PAC spent nearly \$200,000, in various localities during a time period in which Mr. Bush was speaking at those localities. Moreover, the Super PAC made a rent payment on a building that was likely used to house discussions or make telephone calls to determine the viability of a candidacy. This also may have been the purpose behind the payments to two consultants who are now employees of the Campaign. Some entity had to have financed Mr. Bush’s activities during the long testing-the-waters period; because

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<sup>17</sup> 52 U.S.C. § 30101(2).

<sup>18</sup> See 11 C.F.R. §§ 100.72, 100.131.

<sup>19</sup> 11 C.F.R. § 100.72(a).

<sup>20</sup> 11 C.F.R. § 100.72(a).

<sup>21</sup> *Id.* § 100.72(a).

there is no record of Mr. Bush or the Campaign paying for it, it appears that the Super PAC contributed the funds.

**2. Mr. Bush, the Leadership PAC, and the Campaign may have violated the Act by giving or accepting impermissible contributions or failing to comply with reporting requirements.**

As noted earlier, if an entity makes payments to support the exploratory activities of an individual who becomes a candidate, those payments count as expenditures subject to the Act's limitations and reporting requirements.<sup>22</sup> Moreover, pre-candidacy expenditures by multicandidate PACs are deemed an in-kind contribution to, and an expenditure by, a Presidential candidate, even if made before candidacy is triggered, if three conditions are met: (1) the expenditure is made on or after January 1 of the year immediately following the last presidential election year; (2) with respect to the goods or services involved, the candidate accepted or received them, requested or suggested their provision, was materially involved in the decision to provide them, or was involved in substantial discussions about their provision; and (3) the goods and services are for (a) polling expenses, (b) compensation paid to employees, consultants, or vendors for services concerning staffing offices in states where presidential primaries, caucuses, or preference polls are to be held (other than offices in the candidate's home state or near D.C.), (c) administrative expenses concerning such offices, including rent, utilities, office supplies and equipment, and (d) expenses of individuals seeking to become delegates in the presidential nomination process.<sup>23</sup> However, if the candidate, through an authorized committee, reimburses the multicandidate PAC within 30 days of becoming a candidate, the payment is not deemed an in-kind contribution for either entity, nor an expenditure.<sup>24</sup>

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<sup>22</sup> *Id.* § 100.131(a).

<sup>23</sup> *Id.* § 110.2(l).

<sup>24</sup> *Id.* § 110.2(l)(2).

Because the Campaign has not reimbursed the Leadership PAC (which is a multicandidate committee<sup>25</sup>) for the expenditures listed in Exhibit A, the Campaign may have violated the Act. First, all expenditures at issue occurred after January 1, 2013, the year immediately following the last presidential election year. Second, given that the Leadership PAC paid for activities that are traditionally paid for by a campaign – including finance consulting, communications consulting, political strategy consulting, etc. – Mr. Bush and his agents were surely materially involved in the decisions to provide these services or at least engaged in discussions about them. Third, the Leadership PAC’s expenditures were for consulting and vendor services, and it is likely that – given the proximity to the primary season – these services were used for polling expenses or staffing offices in various states other than Florida and the District of Columbia.

Moreover, multicandidate PACs may contribute only up to \$5,000 per election to a candidate committee.<sup>26</sup> If its payments, which total nearly \$1,000,000, constitute contributions, the Leadership PAC clearly violated the contribution limits.

### C. REQUESTED ACTION

As shown, FEC and media reports strongly suggest that Mr. Bush and Respondents have violated the Act and Commission regulations by using impermissible funds to support testing-the-waters efforts. We respectfully request that the Commission investigate these violations, and that Respondents be enjoined from further violations and fined the maximum amount permitted by law.

Sincerely,

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<sup>25</sup> FEC Form 1, Statement of Organization, Right to Rise PAC, Inc. (Jan. 6, 2015).

<sup>26</sup> See FEC, Contribution Limits for 2015-2016 Federal Elections, available at <http://www.fec.gov/info/contriblimitschart1516.pdf>.

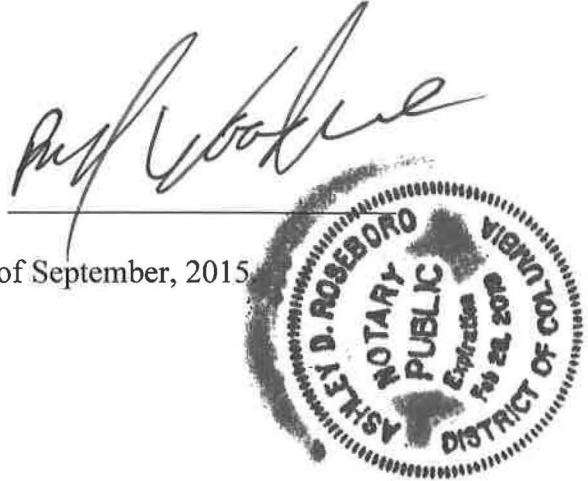
SUBSCRIBED AND SWORN to before me this 14 day of September, 2015.

Ashley D. Rose

Notary Public

My Commission Expires:

2/28/2019



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Exhibit A

## **Leadership PAC Expenditures**

### **A. Consulting Services**

1/26/15: Right to Rise PAC Inc. paid Garnet Solutions \$2,083 for “Finance Consulting” [Right to Rise PAC Inc., Midyear 2015 Report, FEC, 7/31/15]

2/2/15: Right to Rise PAC Inc. paid Ann Herberger \$2,778 for “Finance Consulting” [Right to Rise PAC Inc., Midyear 2015 Report, FEC, 7/31/15]

2/2/15: Right to Rise PAC Inc. paid Ann Herberger \$1,250 for “Finance Consulting” [Right to Rise PAC Inc., Midyear 2015 Report, FEC, 7/31/15]

2/9/15: Right to Rise PAC Inc. paid \$8,811 to 30 Point Strategies LLC for “Communications Consulting” [Right to Rise PAC Inc., Midyear 2015 Report, FEC, 7/31/15]

2/16/15: Right to Rise PAC Inc. paid \$2,500 to The McIntosh Company for “Finance Consulting” [Right to Rise PAC Inc., Midyear 2015 Report, FEC, 7/31/15]

2/18/15: Right to Rise PAC Inc. paid Steffan Hoffman \$2,500 for “Web Consulting” [Right to Rise PAC Inc., Midyear 2015 Report, FEC, 7/31/15]

2/25/15: Right to Rise PAC Inc. paid Ann Herberger \$1,250 for “Finance Consulting” [Right to Rise PAC Inc., Midyear 2015 Report, FEC, 7/31/15]

2/28/15: Right to Rise PAC Inc. paid \$2,283 to Abigail Robinson for “Finance Consulting” [Right to Rise PAC Inc., Midyear 2015 Report, FEC, 7/31/15]

2/28/15: Right to Rise PAC Inc. paid \$2,283 to Abigail Robinson for “Finance Consulting” [Right to Rise PAC Inc., Midyear 2015 Report, FEC, 7/31/15]

3/2/15: Right to Rise USA Inc. paid Garnet Solutions \$2,183 for “Finance Consulting” [Right to Rise PAC Inc., Midyear 2015 Report, FEC, 7/31/15]

3/2/15: Right to Rise PAC Inc. paid \$9,000 to Redwave Communications for “Political Strategy Consulting” [Right to Rise PAC Inc., USA Midyear 2015 Report, FEC, 7/31/15]

3/3/15: Right to Rise PAC Inc. paid \$11,386 to 30 Point Strategies LLC for “Communications Consulting” [Right to Rise PAC Inc., Midyear 2015 Report, FEC, 7/31/15]

3/4/15: Right to Rise PAC Inc. paid \$9,000 to Redwave Communications for “Political Strategy Consulting” [Right to Rise PAC Inc., Midyear 2015 Report, FEC, 7/31/15]

3/12/15: Right to Rise PAC Inc. paid \$2,500 to The McIntosh Company for “Finance Consulting” [Right to Rise PAC Inc., Midyear 2015 Report, FEC, 7/31/15]

3/16/15: Right to Rise PAC Inc. paid \$9,000 to Redwave Communications for “Political Strategy Consulting” [Right to Rise PAC Inc., Midyear 2015 Report, FEC, 7/31/15]

3/26/15: Right to Rise PAC Inc. paid Ann Herberger \$1,250 for “Finance Consulting” [Right to Rise PAC Inc., Midyear 2015 Report, FEC, 7/31/15]

3/31/15: Right To Rise PAC Inc. paid FP1 Strategies \$172,573 for “Communications Consulting” [Right to Rise PAC Inc., Midyear 2015 Report, FEC, 7/31/15]

3/31/15: Right to Rise PAC Inc. paid Garnet Solutions \$2,383 for “Finance Consulting” [Right to Rise PAC Inc., Midyear 2015 Report, FEC, 7/31/15]

3/31/15: Right to Rise PAC Inc. paid \$874.12 to Dane Bahnsen for “Finance Consulting” [Right to Rise PAC Inc., Midyear 2015 Report, FEC, 7/31/15]

3/31/15: Right to Rise PAC Inc. paid \$2,283 to Abigail Robinson for “Finance Consulting” [Right to Rise PAC Inc., Midyear 2015 Report, FEC, 7/31/15]

4/6/15: Right to Rise PAC Inc. paid \$15,000 to Redwave Communications for “Political Strategy Consulting” [Right to Rise PAC Inc., Midyear 2015 Report, FEC, 7/31/15]

4/6/15: Right to Rise PAC Inc. paid \$11,355 to Redwave Communications for “Political Strategy Consulting” [Right to Rise PAC Inc., Midyear 2015 Report, FEC, 7/31/15]

4/6/15: Right to Rise PAC Inc. paid \$2,500 to The McIntosh Company for “Finance Consulting” [Right to Rise PAC Inc., Midyear 2015 Report, FEC, 7/31/15]

4/8/15: Right to Rise PAC Inc. paid \$11,594 to 30 Point Strategies LLC for “Communications Consulting” [Right to Rise PAC Inc., Midyear 2015 Report, FEC, 7/31/15]

4/15/15: Right to Rise PAC Inc. paid \$12,000 to Wisecup Consulting LLC for “Political Strategy Consulting” [Right to Rise PAC Inc., Midyear 2015 Report, FEC, 7/31/15]

4/29/15: Right to Rise PAC Inc. paid \$1,551 to US Safety & Security LLC for “Logistics Consulting” [Right to Rise PAC Inc., Midyear 2015 Report, FEC, 7/31/15]

5/1/15: Right to Rise PAC Inc. paid \$15,000 to Redwave Communications for “Political Strategy Consulting” [Right to Rise PAC Inc., Midyear 2015 Report, FEC, 7/31/15]

5/5/15: Right to Rise PAC Inc. paid \$2,200 to Mike Thom for “Political Strategy Consulting” [Right to Rise USA Midyear 2015 Report, FEC, 7/31/15]

5/6/15: Right to Rise PAC Inc. paid \$7,500 to 30 Point Strategies LLC for “Communications Consulting” [Right to Rise PAC Inc., Midyear 2015 Report, FEC, 7/31/15]

5/6/15: Right to Rise PAC Inc. paid \$4,551 to US Safety & Security LLC for “Logistics Consulting” [Right to Rise PAC Inc., Midyear 2015 Report, FEC, 7/31/15]

5/5/15: Right To Rise USA Inc. Paid \$20,407 To Hill Research Consultants For “Issues Research.” [Right to Rise USA Midyear 2015 Report, FEC, 7/31/15]

5/6/15: Right to Rise PAC Inc. paid \$19,851 to Matthew Scully for “Communications Consulting” [Right to Rise PAC Inc., Midyear 2015 Report, FEC, 7/31/15]

5/7/15: Right to Rise PAC Inc. paid \$20,833 to R2R Research for “Issues Research” [Right to Rise USA Midyear 2015 Report, FEC, 7/31/15] Right to Rise PAC Inc.,

5/11/15: Right to Rise PAC Inc. paid \$13,749 to Axis Research for “Issues Research” [Right to Rise PAC Inc., Midyear 2015 Report, FEC, 7/31/15]

5/18/15: Right To Rise PAC Inc. paid FP1 Strategies \$55,989 For “Communications Consulting.” [Right to Rise USA Midyear 2015 Report, FEC, 7/31/15]

5/19/15: Right to Rise PAC Inc. paid \$14,666 to R2R Research for “Issues Research” [Right to Rise PAC Inc., Midyear 2015 Report, FEC, 7/31/15]

5/21/15: Right to Rise PAC Inc. paid \$4,640 to US Safety & Security LLC for “Logistics Consulting” [Right to Rise PAC Inc., Midyear 2015 Report, FEC, 7/31/15]

5/25/15: Right to Rise PAC Inc. paid \$12,000 to Wisecup Consulting LLC for “Political Strategy Consulting” [Right to Rise PAC Inc., Midyear 2015 Report, FEC, 7/31/15]

5/25/15: Right to Rise PAC Inc. paid McDonald Hopkins \$6,415 for “Legal Consulting” [Right to Rise PAC Inc., Midyear 2015 Report, FEC, 7/31/15]

5/28/15: Right To Rise PAC Inc. Paid \$13,163 To Hill Research Consultants For “Issues Research.” [Right to Rise PAC Inc., Midyear 2015 Report, FEC, 7/31/15]

6/1/15: Right to Rise PAC Inc. paid \$1,928 to US Safety & Security LLC for “Logistics Consulting” [Right to Rise PAC Inc., Midyear 2015 Report, FEC, 7/31/15]

6/2/15: Right to Rise PAC Inc. paid \$12,500 to Matthew Scully for “Communications Consulting” [Right to Rise PAC Inc., Midyear 2015 Report, FEC, 7/31/15]

6/3/15: Right to Rise PAC Inc. paid \$517.50 to Atchley & Associates for “Accounting Consulting” [Right to Rise PAC Inc., Midyear 2015 Report, FEC, 7/31/15]

6/5/15: Right to Rise PAC Inc. paid \$26,7500 to Axis Research for “Issues Research” [Right to Rise PAC Inc., Midyear 2015 Report, FEC, 7/31/15]

6/5/15: Right to Rise PAC Inc. paid \$1750.00 to Eric Baker for “Political Strategy Consulting” [Right to Rise PAC Inc., Midyear 2015 Report, FEC, 7/31/15]

6/5/15: Right to Rise PAC Inc. paid \$6,000 to Mike Thom for “Political Strategy Consulting” [Right to Rise PAC Inc., Midyear 2015 Report, FEC, 7/31/15]

6/8/15: Right to Rise PAC Inc. paid \$149,294 to Revolution Media Group for “Political Strategy Consulting” and “Web Consulting and Services” [Right to Rise PAC Inc., Midyear 2015 Report, FEC, 7/31/15]

6/10/15: Right to Rise PAC Inc. paid \$8,401 to 30 Point Strategies LLC for “Communications Consulting” [Right to Rise PAC Inc., Midyear 2015 Report, FEC, 7/31/15]

6/12/15: Right to Rise PAC Inc. paid \$1,000 to Philip Condo for “Political Strategy Consulting” [Right to Rise USA Midyear 2015 Report, FEC, 7/31/15]

## **B. Vendor Services**

2/13/15: Right to Rise PAC Inc. paid \$8,208 to CMDI for “Database Management” [Right to Rise PAC Inc., Midyear 2015 Report, FEC, 7/31/15]

3/12/15: Right to Rise PAC Inc. paid \$17,246 to CMDI for “Database Management” [Right to Rise PAC Inc., Midyear 2015 Report, FEC, 7/31/15]

3/23/15: Right to Rise PAC Inc. paid \$67,740 to Digital Core Campaign LLC for “Database Management” [Right to Rise PAC Inc., Midyear 2015 Report, FEC, 7/31/15]

3/23/15: Right to Rise PAC Inc. paid \$2,979 to CMDI for “Database Management” [Right to Rise PAC Inc., Midyear 2015 Report, FEC, 7/31/15]

4/14/15: Right to Rise PAC Inc. paid \$14,455 to CMDI for “Database Management” [Right to Rise PAC Inc., Midyear 2015 Report, FEC, 7/31/15]

5/12/15: Right to Rise PAC Inc. paid \$4,732 to CMDI for “Database Management” [Right to Rise PAC Inc., Midyear 2015 Report, FEC, 7/31/15]

5/13/15: Right to Rise PAC Inc. paid \$52,438 to Digital Core Campaign LLC for “Database Management” [Right to Rise PAC Inc., Midyear 2015 Report, FEC, 7/31/15]

5/15/15: Right to Rise PAC Inc. paid \$2036.18 to Iowa Events Center for “Facility Rental” [Right to Rise PAC Inc., USA Midyear 2015 Report, FEC, 7/31/15]

5/27/15: Right to Rise PAC Inc. paid \$2,497 to Iowa Events Center for “Catering” [Right to Rise PAC Inc., Midyear 2015 Report, FEC, 7/31/15]

6/915; Right to Rise PAC Inc. paid \$5,175 to CMDI for "Database Management" [Right to Rise PAC Inc., Midyear 2015 Report, FEC, 7/31/15]