

outrageous claims, regardless of *how* spurious and outrageous, and who must pay the costs of defending themselves against whatever false complaints these perennial, professional Complainants take such delight in filing.

This is yet another such false complaint. As the sworn testimony attached to this Response discloses, the Complaint relies solely on selective excerpts from news articles, none of which are accurate and none of which can overcome the *facts* of this matter. The Respondents have taken every possible step to comply with the Act and the Commission's regulations governing 'testing the waters' and candidacy status under the law and have spent only funds from a testing the waters account for any testing the waters activities.

The following *facts* are uncontroverted:

1. Patriot Voices PAC (the entity that received the Commission's notice of this Complaint) has paid for *nothing* for Sen. Santorum during 2015. The only travel costs for Sen. Santorum paid by the PAC were during 2014. All expenditures by the Patriot Voices PAC have related to candidates in past election cycles and *none* for any 2016 candidates. The only potential 2016 candidate about whom an expenditure was made related to Hillary Clinton, before she announced her candidacy. *See Affidavit of Nadine Maenza, Treasurer of Patriot Voices PAC.*
2. Patriot Voices, the 501(c)(4) issue organization, has taken extraordinary steps to make certain that all expenditures by Patriot Voices have been *for* Patriot Voices purposes, and that no disbursements by Patriot Voices have been for any candidate-related activities, whether for a Rick Santorum candidacy or any other candidate for public office. *See Affidavits of Nadine Maenza, Executive Director of Patriot Voices, Inc., and Shelly Ahlersmeyer, National Grassroots Director of Patriot Voices.*
3. Sen. Santorum properly established a 'testing the waters' account on April 6, 2015 for purposes of determining if there is sufficient support for him to consider another candidacy for the Republican nomination for President in 2016. Prior to the establishment of the 'testing the waters' account, there were no activities or expenditures that necessitated the creation of a 'testing the waters' effort. When the decision was made by Sen. Santorum to actually consider a 2016 candidacy, a 'testing the waters' account was established – and funds from that account have paid for any and all subsequent expenses related to a potential candidacy. *See Affidavits of Nadine Maenza, Executive Director of Patriot Voices and Rick Santorum.*

In summary, *none* of the allegations in the Complaint are accurate and no violations of the Act have occurred.

Factual Background

The Complaint alleges certain facts which Complainants claim constitute a violation of the Act. Respondents address and refute each of those allegations.

1. **Allegation:** The Complaint alleges that a 'string of gatherings' occurred in early 2015 to 'plot another presidential bid'. Complaint, ¶¶4 & 5.

Facts: Sen. Santorum developed a network of former staffers and close acquaintances over many years while serving in public office and which he has continued to nurture since. In early 2015, a group of those former staffers had a reunion and part of the discussion (after catching up about family, careers and current interests) involved what Sen. Santorum has been doing since the 2012 presidential campaign, what lessons various of the participants had learned from the 2012 campaign (as several had participated in it) and some discussion about whether Sen. Santorum might have any interest in making another race and, if so, what that might involve. There was no intention or decision before or resulting from that private meeting that could be construed as testing the waters for a federal candidacy or triggering the creation of a testing the waters effort or account. The meeting was a private discussion among close associates and family friends. *See Affidavit of Matt Beynon, former Santorum staff member.*

2. **Allegation:** That Foster Friess, a long-time supporter of Sen Santorum's going back many years had a 'private gathering in Scottsdale, AZ to rally support behind Santorum's potential 2016 bid.'" Complaint, ¶6.

Facts: The quote from John Brabender about the meeting was prospective and speculative and was *not* a statement about what actually transpired at the meeting. What *did* happen at the meeting was a discussion about Patriot Voices and its progress and activities. The purpose of the meeting was to introduce prospective donors to the leaders and the activities of Patriot Voices. There was no discussion about any presidential campaign or potential 2016 bid and that was not the purpose of the meeting. *See Affidavits of Nadine Maenza, Executive Director of Patriot Voices and Affidavit of Sen. Santorum.*

3. **Allegation:** That a meeting was held in Leesburg, VA one week later to discuss a possible 2016 candidacy. Complaint, ¶7.

Facts: The meeting referenced in this article was the annual planning meeting for Patriot Voices, which reviewed the past year's activities, issues, and fundraising, and developed the strategic plans for Patriot Voices for the coming year. This was not a campaign planning meeting, other than some minimal discussion about the press reports of a possible Santorum 2016 presidency and the impact on Patriot Voices should Sen. Santorum resign his role with Patriot Voices at some point in the future, for purposes of contingency planning should the National Co-Chairman resign for *any* reason. *See Affidavit of Nadine Maenza*

4. **Allegation:** That Sen. Santorum traveled to Iowa to speak at the Iowa Freedom Summit as a 'prospective 2016 presidential candidate'. Complaint ¶8.

Facts: Sen. Santorum was one of more than two dozen speakers invited by Rep. Steve King (R-IA) and Citizens United President David Bossie to address a gathering of conservative activists and leaders. The organizers described the meeting this way:

**Iowa Freedom Summit
January 24, 2015**

Citizens United and Congressman Steve King are teaming up to bring grassroots activists from across Iowa to hear directly from conservative leaders on how we can get America back on track by focusing on our core principles of pro-growth economics, social conservatism, and a strong national defense.

See website of the Iowa Freedom Summit <http://www.iafreedomsummit.com/> (accessed May 18, 2015)

The speakers included current and former officeholders from across the country. Some have been talked about as prospective 2016 presidential candidates, but many were not.

At the Summit, Sen. Santorum was introduced as one of America's most respected conservative leaders, and was described as a former US Senator and former Presidential candidate in 2012. In neither the introduction of Sen. Santorum *nor* in his remarks was there any reference to a 2016 Santorum presidential candidacy.

Rather, Sen. Santorum spoke about his baby daughter Bella, the book he and his wife have recently published about their daughter, his immigrant grandfather who was a coal miner in western Pennsylvania, the American dream, the wrong-headed policy failures of the Obama administration, the divisions created by leftist policies, the need for unifying messages about opportunity for all Americans and restoring the American dream, the importance of GOP support of American workers and the working class, the failures of the top-down education, the need for less Common Core and more 'common sense' in education, strengthening the family, reaching out to minorities, opposing corporate welfare, supporting manufacturing initiatives, expanding domestic energy production, caring about the American worker and having policies and messages that reach out to them, the importance of legal immigration and policies to enforce the immigration laws, national security, the dangers of isolationism, his expertise and experience in national security matters, his success in Iowa in 2012, the role of Iowans in the vetting of candidates for the presidential nominations, and his thanks for their hard work in participating in the process.

See <http://www.c-span.org/video/?323834-11/iowa-freedom-summit-rick-santorum>

In addition to his speech at the Iowa Freedom Summit, Sen. Santorum spent time in Iowa meeting with Patriot Voices grassroots leaders and recruiting additional grassroots leaders to join Patriot Voices. *See Affidavits of Nadine Maenza and Rick Santorum.*

In short, while the press may have treated the Iowa Freedom Summit as solely a presidential contenders' event, the Complainants clearly failed to listen to Sen. Santorum's

speech (or likely *any* of the multi-hours of speeches at the event). Had they *listened* to Sen. Santorum's speech, they would have known that the allegations in Paragraph 8 of their Complaint has no basis in fact.

5. **Allegation:** That Sen. Santorum spoke to CPAC in February 2015 about a 2016 potential presidential campaign. Complaint, ¶9

Facts: Sen. Santorum has been a featured speaker at CPAC for more than a dozen years because he has *always* been a key conservative leader, both when in office and since. At CPAC 2015, Sen. Santorum spoke about his 2012 campaign, what he learned traveling around the country, what he has done since 2012 (writing two books, one on the American worker and one about his disabled baby daughter, Bella), and his experience in the US Senate in the area of national security. At *no* time during his speech, did Sen Santorum talk about his potential presidential candidacy in the 2016 cycle. Obviously, the Complainants didn't take the time to actually *watch* or *listen* to Sen. Santorum's 2015 CPAC speech, either. A public figure talking about what the United States should be doing in various policy arenas and what America needs in its next president does *not* constitute a candidacy or a potential candidacy, and does not subject the speaker to regulation by the federal government. Only in the question and answer session, did a *questioner* raise the issue of Sen. Santorum's potential candidacy for president. Sen. Santorum did not make any comment with regard to the assertion by the questioner and his response focused solely on the job requirements for any Commander-in-Chief, making no reference whatsoever to a potential candidacy. <http://www.c-span.org/video/?324558-13/rick-santorum-remarks-cpac>

Patriot Voices was a co-sponsor of CPAC and for that co-sponsorship was entitled to host small group meetings. In addition to his speech to the general session of CPAC, Sen. Santorum participated in the Patriot Voices meetings with grassroots activists and leaders. The meetings concerned the goals and activities of Patriot Voices and did not include discussions about a 2016 presidential campaign or any candidate related activities. *See Affidavits of Nadine Maenza and Rick Santorum.*

6. **Allegations:** That Sen. Santorum is a confirmed speaker for the Iowa Republican Party's annual Lincoln dinner on May 16, 2015. Complaint ¶10

Facts: On April 6, 2015, Sen. Santorum established a testing the waters account to initiate serious consideration of a potential 2016 presidential bid. From and after April 6, 2015, Sen. Santorum's travel related to a potential candidacy has been paid from the testing the waters account. Should Sen. Santorum ultimately announce a candidacy for the 2016 election cycle, his campaign committee's FEC report will reflect all contributions to and expenditures by the testing the waters account. Sen. Santorum's travel to the Iowa Republican Party's Lincoln dinner was paid for by the testing the waters account. *See Affidavit of Sen. Santorum*

7. **Allegations:** That Matt Beynon, a staff member to Sen. Santorum is quoted as saying that it is important to wisely use your candidate's time, and their appeal, and who is going to gravitate towards the candidate." Complaint ¶11.

Facts: Matt Beynon was interviewed by a reporter in the context of serving as a political consultant with experience working for Senator Santorum's 2012 presidential campaign and for other candidates / campaigns that have not raised significant funds, but which are still able to compete at the highest levels. The question was asked in the context of Jeb Bush, Scott Walker, Mitt Romney and other candidates or prospective candidates who in 2012 and 2015 attended / are attending numerous billionaire events and how candidates like Sen. Santorum raise money if they are not attending such events. Mr. Beynon answered that, if you work for such a candidate, you need to use your candidate's time wisely, understand their appeal, and know who will gravitate to your candidate – essentially, to get the most bang for your candidate's buck and don't put them in front of people who will not support them because that's a waste of everyone's valuable time.

It is evident that Mr. Beynon was generically referring to any candidate and not Sen. Santorum because, as he attests under oath, in his twelve years of working for Sen. Santorum, he does not recall ever referring to Sen. Santorum as "the candidate" in an interview or in any other circumstance. Mr. Beynon refers to him as Senator Santorum, "RJS," "Rick," or "The Boss".
See Affidavit of Matt Beynon

8. Allegations: That Sen. Santorum 'operates' Patriot Voices and Patriot Voices PAC and that Patriot Voices PAC reported receipts in excess of \$1.5 million during the 2014 election cycle. Complaint ¶¶ 12, 13

Facts: Sen. Santorum and his wife Karen have served as the founding Co-Chairmen of Patriot Voices since 2012 and have built an impressive national grassroots effort around serious issues and legislation. Sen. Santorum has had no formal role with the Patriot Voices PAC other than as its spokesman. Sen. Santorum did not establish and does not control Patriot Voices PAC. The Patriot Voices PAC was actively engaged in the 2014 mid-term elections and Sen. Santorum travelled to various states, speaking publicly about the PAC's endorsed conservative candidates and mobilizing grassroots support for conservative candidates.

Neither Patriot Voices nor Patriot Voices PAC have made expenditures in support of a possible 2016 presidential bid by Sen. Santorum. All disbursements for travel and other expenses by Patriot Voices and Patriot Voices PAC have been for actual costs related to the respective organizations and for no other purposes. Sen. and Mrs. Santorum resigned as Co-Chairmen of Patriot Voices effective May 4, 2015. *See Affidavit of Nadine Maenza.*

9. Allegations: That seasoned fundraisers were announced in January 2015 as the senior finance team for Patriot Voices and Patriot Voices PAC. Complaint ¶14.

Facts: Since January 2015, the finance team has worked hard to raise funds for both Patriot Voices and Patriot Voices PAC to make certain that the organizations have financial resources to engage in the national debate on the issues that have been the hallmark of Patriot Voices, and for Patriot Voices PAC to be able to be engaged in 2016 as it was in 2014. These facts do not give rise to any violation of the Act. *See Affidavit of Nadine Maenza*

10. Allegation: That Sen. Santorum announced that Iowa Rep. Walt Rogers would serve as Iowa chairman of Patriot Voices. Complaint ¶15.

Facts: Rep. Rogers is an unpaid, volunteer grassroots leader whose job was and is to find more grassroots activists and leaders who will become involved with Patriot Voices. No resources of Patriot Voices, Patriot Voices PAC or Rep. Rogers have been spent on a 2016 potential Santorum presidential candidacy. There is no Iowa office and, accordingly, no Patriot Voices or Patriot Voices PAC funds have been spent for Iowa office expenses. See *Affidavit of Nadine Maenza*.

Legal Discussion

Every potential candidate for office necessarily goes through a series of steps and considerations before ultimately deciding whether to seek – or not to seek – public office. In particular, serious candidates for the presidency are individuals with extensive public profiles, vast networks of friends and supporters, defined views on public policy issues and principles and relationships with various entities and organizations developed over many years. Absent such assets, an individual cannot begin to even consider a race for president.

The accumulation of such assets happens over time. It is *not* the law that a potential presidential candidate must establish a testing the waters account when the first thought of becoming a candidate enters the individual's mind. There will *always* be a pre-testing the waters phase when the idea of becoming a candidate begins to take root...and it is absolutely *not* required that the very first such notion triggers the requirement to establish a testing the waters account.

Meeting with close friends, family members, and associates to discuss the possibility of moving toward thinking about a candidacy, well before the idea becomes an intention or a plan, is not a 'testing the waters' activity.

Public speeches that do not reference an election or candidacy don't trigger testing the waters.

As the Complaint notes, the FEC regulations define 'testing the waters' activities for potential presidential candidates to include:

- Polling expenses
- Compensation paid to employees, consultants or vendors to establish offices where Presidential primaries, caucuses, or preference polls are to be held;
- Expenses related to establishing such offices
- Expenses of individuals seeking to become delegates in the Presidential nominating process

11 C.F.R. §§ 110.2(1)(1) and 9034.10(a)

There is no allegation (because there are no facts to support such an allegation) that any funds have been spent by either Patriot Voices or Patriot Voices PAC for polling, establishing offices, or paying expenses of individuals seeking to become delegates in the Presidential nominating process.

Rather, the only allegations the Complainants could come up with are that since January 2015, Sen. Santorum has had one meeting with close friends and associates, conducted a planning meeting for and about Patriot Voices, engaged in fundraising for Patriot Voices and Patriot Voices PAC, and that he gave a number of speeches, none of which referenced a potential 2016 candidacy or campaign.

The Complaint weaves together these separate and perfectly permissible activities as a basis for accusing Respondents of violating the Act. However, the activities identified in the Complaint do not trigger any legal obligations under the Act nor do they limit fundraising as specified in the Act.

At the point in time when Sen. Santorum began to seriously consider becoming a candidate for president in 2016, he established a testing the waters account. All expenses associated with testing the waters activities, including travel, staff expenses, scheduling, and fundraising for the testing the waters efforts have been paid with funds raised in accordance with the Act, and, should Sen. Santorum become a candidate, will be duly reported to the FEC on a regular report.

The Commission has recognized that individuals who have deferred to a later date a decision about whether or not they plan to seek their party's nomination for president in a coming election cycle may be involved in speaking, traveling, organizing grassroots leaders and undertaking activities that might ultimately benefit a potential candidacy but are not deemed to trigger either candidacy or testing the waters requirements. In Advisory Opinion 1986-06, then Vice-President George H. W. Bush was the national honorary chairman of Fund for America's Future, a federal non-connected PAC. The Commission found that all the activities described by the Fund that would involve Vice President Bush were permissible and did not constitute candidate-related activity for a future, theoretical bid for the 1988 Republican presidential nomination. That scenario is most closely akin to the present facts. The Commission essentially recognized that there is such a thing as a "pre-pre-candidacy" phase.

The Complaint, instead, relies upon Advisory Opinion 1985-40 for its allegations of these Respondents' violation of the Act. However, in the facts underlying that Advisory Opinion, then Senator Howard Baker was already *in* the testing the waters phase of ascertaining whether to become a candidate for the Republican nomination for president in 1988. The questions posed to the Commission in that Advisory Opinion Request were quite different than the allegations lodged against the Respondents in this MUR. There, Sen. Baker was actively pursuing the decision as to whether to become a candidate and had created a testing the waters account for that purpose. His questions centered around whether certain activities that would be undertaken as *part* of testing the waters would be required to be paid from the testing the waters account. The Commission determined that an individual already within the testing the waters phase would

be required to pay for the activities and expenses of exploring a potential candidacy from funds in the testing the waters account.

That is not the case here. In this instance, the allegations of the Complaint reference (falsely) that certain public appearances somehow constituted evidence of testing the waters, even though there was no reference in the public appearances to a 2016 candidacy. Such appearances, without more, do not constitute actions to trigger candidacy or pre-candidacy status.

And at the point in time when Sen. Santorum decided affirmatively to move forward with serious consideration of a potential 2016 presidential bid, he established a testing the waters account and all travel and other expenses associated with a potential 2016 candidacy have since been paid from that account.

Conclusion

Respondents Patriot Voices PAC and Rick Santorum, as well as the non-Respondent witness Patriot Voices, Inc. submit to the Commission that the allegations in the Complaint are false, baseless and do not constitute a violation of the Act by any of them.

The Commission has no factual basis on which to find reason to believe that a violation has occurred and, accordingly, the Complaint should and must be dismissed.

Respectfully submitted,



Cleta Mitchell, Esq.
FOLEY & LARDNER LLP
3000 K Street NW #600
Washington, DC 20007
(202) 672-5300 (main)
(202) 672-5399 (fax)
cmitchell@foley.com

Counsel for Rick Santorum,
and
Patriot Voices PAC, Respondents;
and Patriot Voices, Inc.

Date: May 21, 2015

Affidavit of Nadine Maenza
In her official capacity as
Treasurer, Patriot Voices PAC

100044141418

2011-03-08 10:00:00 AM

Chester County
Commonwealth of Pennsylvania

Affidavit of Nadine Maenza, Treasurer of Patriot Voices PAC

I, Nadine Maenza, the undersigned resident of the Commonwealth of Pennsylvania, do hereby affirm and state:

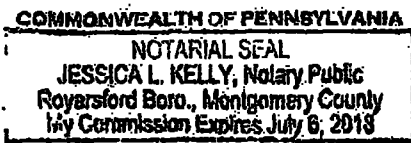
1. I am the treasurer of Patriot Voices PAC and I see and approve all requests for disbursements by Patriot Voices PAC.
2. Patriot Voices PAC has paid for no travel expenses for Sen. Rick Santorum during calendar year 2015.
3. Patriot Voices PAC has paid for no other expenses associated with any candidate for office in 2016, including but not limited to Sen. Rick Santorum.
4. The only disbursement by Patriot Voices PAC about or related to a potential 2016 presidential candidate was a communication critical of Hillary Clinton, prior to the announcement of her candidacy.
5. All disbursements by Patriot Voices PAC are for expenses of the PAC and other expenditures appropriate for a federal political committee such as Patriot Voices PAC.
6. The above and foregoing statements are true and correct to the best of my knowledge and belief.

Further Affiant Sayeth Not.

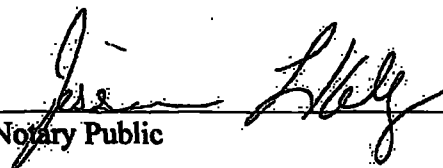


Nadine Maenza, Treasurer
Patriot Voices PAC

Before me this 21 day of May, 2015, personally appeared Nadine Maenza, who attested under penalty of perjury that the above and foregoing information is true and correct to the best of her knowledge and belief.

SEAL 
COMMONWEALTH OF PENNSYLVANIA
NOTARIAL SEAL
JESSICA L. KELLY, Notary Public
Royersford Boro., Montgomery County
My Commission Expires July 6, 2018

My Commission Expires: July 6, 2018



Notary Public

Chester County
Commonwealth of Pennsylvania

Affidavit of Nadine Maenza, Executive Director of Patriot Voices

I, Nadine Maenza, being of lawful age and the undersigned resident of the Commonwealth of Pennsylvania, do hereby affirm and state:

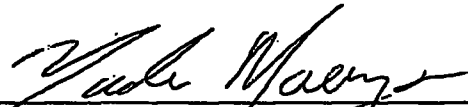
1. I am the Executive Director of Patriot Voices, Inc., a social welfare non-profit organization, exempt from taxation as a Section 501(c)(4) organization ("Patriot Voices").
2. Patriot Voices was founded in 2012 and has been engaged since that time in promoting a key set of issues, values and principles in the public policy arena.
3. Our description of Patriot Voices on our website is: We believe in America's Future, we are moms, dads, nurses, teachers, firefighters, business owners, students, truck drivers, veterans and grandparents from every walk of life who are concerned about the direction our country is headed. We want government to be smaller and less intrusive. We support policies that give the American worker a fighting chance and we know that strong families produce a strong economy. We believe in entrepreneurship and opportunity. We encourage personal responsibility. We know that the right to life begins at conception and we must be a voice for those who cannot fight for themselves. Americans have always met the challenges thrown at us and we can meet them again. We are many voices joined together. We are Patriot Voices. <http://www.patriotvoices.com/about>
4. Our national co-chairmen from 2012 until May 4, 2015 were former Sen. Rick Santorum and his wife, Karen.
5. In that capacity, Sen. and Mrs. Santorum have worked closely with me and others to build a national grassroots organization dedicated to the principles described above.
6. Patriot Voices has not made political expenditures at any time since its inception. The Patriot Voices PAC was established for that purpose and all political and candidate-related expenditures have been made by and through Patriot Voices PAC, with funds raised specifically for that purpose.
7. As Executive Director of Patriot Voices, I have worked hard to ensure that Patriot Voices is true to its mission of supporting certain issues and values, and to build a grassroots network of like-minded individuals across the nation in support of the Patriot Voices mission – and to make certain that Patriot Voices funds are not spent for political or candidate-related purposes.
8. Patriot Voices funds have not been spent in support of any candidate for any office.

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- 10824142800
9. Patriot Voices has not made any expenditures for 'testing the waters' activities for or on behalf of Sen. Santorum.
 10. Patriot Voices' efforts in 2015 have been dedicated to fundraising and developing the resources to build our national grassroots capabilities. We have participated at important meetings of conservatives, including the Iowa Freedom Summit in January and CPAC in February. At both of those gatherings, Patriot Voices volunteers and staff had meetings and conducted outreach to sign up grassroots leaders and supporters to join Patriot Voices. At neither of those meetings were any Patriot Voices personnel engaged in efforts to support any presidential candidate in 2016.
 11. If individuals approached us about a possible Santorum candidacy for president in 2016, we politely responded that that was not our purpose and that we were working for and on behalf of Patriot Voices and its core principles, issues, and values.
 12. In early 2015, Foster Friess hosted a golf outing in Scottsdale, AZ for Patriot Voices, something he has done regularly over the past several years. The purpose of that meeting was to introduce prospective donors to Patriot Voices and to raise funds for Patriot Voices. Contrary to the press reports, there was no discussion at that event about a Santorum presidential candidacy in 2016. The press reports about that meeting are not accurate.
 13. Patriot Voices held its annual planning meeting in Leesburg, VA in early 2015 to review the activities and accomplishments of Patriot Voices during 2014 and to make plans and develop a strategy for 2015. We discussed the press reports about a potential Rick Santorum presidential campaign in 2016 and contingency plans in the event our national co-chairman Rick Santorum should decide to seek the Republican nomination for president in 2016.
 14. Patriot Voices retained fundraising experts in early 2015 to help increase Patriot Voices and Patriot Voices PAC's revenues. We have worked hard since that time to enhance our fundraising and resources in order to implement our plans and objectives.
 15. I have been very careful to seek legal advice about projects, activities and plans in order not to make expenditures from Patriot Voices that could be deemed to be political.
 16. Rep. Walt Rogers is a member of the Iowa state legislature who, as a volunteer, has been helpful in growing Patriot Voices' presence in Iowa. There is no Patriot Voices office in Iowa and no expenses other than for Patriot Voices materials and grassroots recruitment, similar to the efforts that Patriot Voices has undertaken in other states.
 17. After the testing the waters account was opened on April 6, 2015, I took steps to ensure that any staff, travel or other expenses related to the Santorum testing the waters efforts were paid by funds from the testing the waters account and not by Patriot Voices.

18. Patriot Voices, its officers, staff and board members have made a good faith effort to comply with all applicable laws and regulations, and to ensure that no political activities or expenditures have been paid by Patriot Voices.
19. To the best of my ability, I have done everything possible to make certain that Patriot Voices funds have been spent solely for purposes to benefit Patriot Voices and not for the benefit of Sen. Santorum either personally or politically and it is my belief that Patriot Voices has not spent any funds for such purposes.

Further Affiant Sayeth Not.

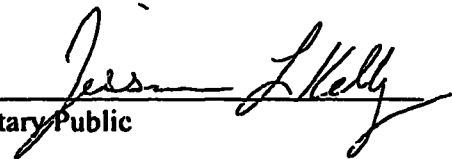


Nadine Maenza, Executive Director
Patriot Voices, Inc.

Before me this 21 day of May, 2015, personally appeared Nadine Maenza who attested under penalty of perjury that the above and foregoing information is true and correct to the best of her knowledge and belief.

SEAL

COMMONWEALTH OF PENNSYLVANIA
NOTARIAL SEAL
JESSICA L. KELLY, Notary Public
No. 131001 Boro., Montgomery County
My Commission Expires July 6, 2018



Notary Public

My Commission Expires: July 6, 2018


Kosciusko County
State of Indiana

Affidavit of Shelley Ahlersmeyer, National Grassroots Director of Patriot Voices

I, Shelley Ahlersmeyer, of lawful age and a resident of the State of Indiana, do hereby affirm and state:

1. I am the National Grassroots Director of Patriot Voices, and have been involved with Patriot Voices since its inception in 2012.
2. My job has been to identify and recruit grassroots leaders and volunteers across the nation who share the vision and adhere to the principles of Patriot Voices.
3. I have been responsible for mobilizing these grassroots leaders and volunteers in support of Patriot Voices' issues and to involve everyday Americans in the policy process so their voices can be heard.
4. I have been instructed of the importance of not using Patriot Voices resources for political purposes and have done my best to ensure that that does not happen.
5. In 2015, Patriot Voices had a presence at CPAC which I was involved in organizing. We handed out Patriot Voices literature and recruited grassroots volunteers for Patriot Voices. We also organized a townhall discussion about conservative issues and had a small private gathering with our leaders who were able to attend the conference.
6. If anyone asked about a possible Rick Santorum campaign, I told them that we were working on Patriot Voices and that this was and is not a campaign organization for Sen. Santorum or any other candidate.
7. I have done my best to ensure that no activities in which I have been engaged on behalf of Patriot Voices would be construed as campaign or candidate-related, as Patriot Voices is an issue organization.
8. The above and foregoing statements are true and correct to the best of my knowledge and belief.

Further Affiant Sayeth Not.


Shelley Ahlersmeyer
National Grassroots Director
Patriot Voices, Inc.

Fairfax County
Commonwealth of Virginia

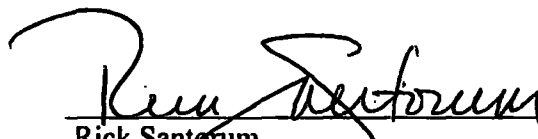
Affidavit of Rick Santorum

I, Rick Santorum, of lawful age and the undersigned resident of the Commonwealth of Virginia, do hereby affirm and state:

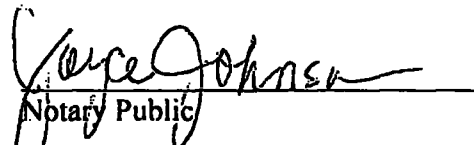
1. I was a candidate for the Republican nomination for President in the 2012 election cycle.
2. From and after the end of the 2012 campaign, I founded (along with others) a national grassroots issue organization, Patriot Voices, Inc. ("Patriot Voices")
3. My wife Karen and I have served as national Co-Chairmen of Patriot Voices since its founding and until our resignations on May 4, 2015.
4. Patriot Voices has been involved in many important issues and has engaged thousands of grassroots volunteers and activists to become involved on those issues.
5. For the past three years, I have been involved in fundraising for and on behalf of Patriot Voices and for its political arm, Patriot Voices PAC.
6. All political contributions or expenditures related to Patriot Voices have been made through the Patriot Voices PAC.
7. The Complaint filed against me contains false statements and inaccuracies.
8. Neither Patriot Voices nor Patriot Voices PAC have made expenditures related to my consideration of a possible 2016 presidential candidacy.
9. My public appearances at the Iowa Freedom Summit and CPAC 2015 were not campaign or candidate appearances and I did not reference in either of those appearances a potential 2016 candidacy.
10. At both events, I met with Patriot Voices leaders and volunteers and worked to enlist volunteers for Patriot Voices. If anyone asked me about a potential 2016 candidacy, I responded that that was not the purpose of these meetings and that we were focused on the issues and mission of Patriot Voices.
11. The private meetings that are referenced in the Complaint were for Patriot Voices or were private gatherings of my former staff and closest associates over many years.
12. My wife and I did not make a final decision about pursuing a potential presidential campaign until the first part of April, 2015.

- 13: Once we made the decision that we were going to 'test the waters' for a possible candidacy in 2016, we established a testing the waters account on April 6, 2015.
14. Since April 6, 2015, my political travel and potential candidate related activity has been paid from the testing the waters account.
15. There were obligations and commitments that I still had to Patriot Voices and other private interests that required my participation after the opening of the testing the waters account.
16. I fulfilled those commitments during the month of April 2015; Karen and I then resigned as the national co-chairs of Patriot Voices effective May 4, 2015.
17. Neither Patriot Voices nor the Patriot Voices PAC have paid any costs or made any disbursements for my testing the waters activities; those activities have been paid by the testing the waters account. If I become a candidate for the GOP nomination for president in 2016, all receipts into and disbursements from the testing the waters account will be reported on the first FEC report filed by the campaign committee, in accordance with FEC regulations
18. My travel and other expenses to speak at the Iowa Republican Party Lincoln Day dinner on May 16, 2015 were paid with funds from the testing the waters account.
19. The staff of Patriot Voices, my family and I have all made a good faith effort to understand and comply with the laws governing candidates, issue organizations, potential candidates, PACs and we believe that we have fully complied with all applicable law.
20. The above and foregoing statements are true and correct to the best of my knowledge and belief.

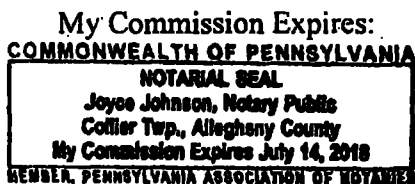
Further Affiant Sayeth Not.


Rick Santorum

On this 20th day of May, 2015, Rick Santorum personally appeared before me and attested under penalty of perjury that the above and foregoing information is true and correct to the best of his knowledge and belief.


Notary Public

SEAL



Affidavit of Matt Beynon

CONFIDENTIAL

CONFIDENTIAL

Arlington County
Commonwealth of Virginia

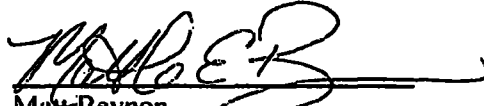
Affidavit of Matt Beynon

I, Matt Beynon, of lawful age and a resident of the Commonwealth of Virginia, do hereby affirm and state:

1. I have worked in various capacities for Sen. Rick Santorum for more than eleven (11) years, both in his Senate office and on his 2012 presidential campaign.
2. One of my tasks has been to keep track of the whereabouts and contact information of the former staffers for Sen. Santorum as we have periodic reunions and gatherings with Sen. Santorum, where the Senator provides personal and professional updates.
3. I helped organize a reunion of Santorum staffers in early 2015, which was one of numerous that we have had over the years.
4. This was a private gathering of long-time friends and former colleagues, who had all known Sen. Santorum personally for at least a decade and in some cases had been family friends for 25 years.
5. We spent at least half the time at the gathering, mingling and catching up on everyone's current whereabouts, their families and the conversations that friends and former colleagues have at a reunion of this type.
6. Sen. Santorum spoke about what he has been doing since 2012 and about Patriot Voices, the national grassroots organization that he founded.
7. Sen. Santorum talked about his family and, in particular, about Bella and her incredible story, and about the book that he and Mrs. Santorum had written about Bella and their work to raise awareness about how our society can better care for children and adults with disabilities. "Bella's Gift" was released just two weeks after this reunion.
8. Everyone present was keenly interested in hearing about Sen. Santorum's experiences in the 2012 presidential campaign.
9. Sen. Santorum was asked questions about his thoughts and any personal and family considerations regarding whether he would run again in 2016 and he was encouraged by attendees to make a run for President in 2016. However, Sen. Santorum did not state that he was going to run for president.
10. His comments were largely in the context of what is wrong with the Republican Party and its failure to develop policies, platforms and messages that can demonstrate to huge segments of the population that Republicans know and care about them.

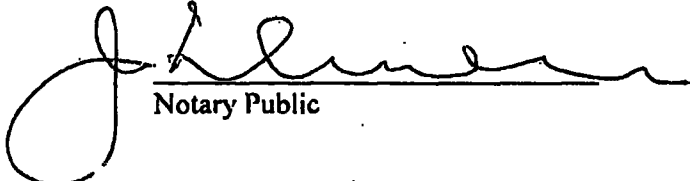
11. After news reports appeared about the huge amounts of money former Gov. Jeb Bush was raising for a prospective candidacy in 2016 and that a number of prospective candidates for president in 2016 were flying around the country meeting with billionaires, and in light of all the money that Mitt Romney spent in 2012, I was contacted by a reporter and interviewed for a story about how candidates who are not included in the 'billionaire' meetings can be competitive. As someone who had worked for the 2012 Santorum presidential campaign and other candidates over the years, I told the reporter that I had learned not to worry about such things, and that in any campaign, in order to get the most bang for your buck, it is important to use your candidate's time wisely, understand their appeal, and know who will gravitate to your candidate, because it is a waste of time to put your candidate in front of people who are not likely to support your candidate. I was speaking generically and from my experiences working for a number of candidates and campaigns. I was NOT speaking about the 2016 presidential campaign or potential campaign of Sen. Santorum.
12. To my best recollection, I have never referred to Sen. Santorum as 'your candidate' or 'the candidate'. When speaking about or to Sen. Santorum, I refer to him as Sen. Santorum, Rick, RJS or the Boss. My quotes in the story referenced in the complaint are taken out of context and are not in any way suggesting or stating that Sen. Santorum had commenced a campaign or a pre-campaign for 2016. That is simply not what the interview was about and was not what I was saying.
13. The above and foregoing statements are true and correct to the best of my knowledge and belief.

Further Affiant Sayeth Not.


 Matt Beynon

On this 21st day of May, 2015, Matt Beynon personally appeared before me and attested under penalty of perjury that the above and foregoing information is true and correct to the best of his knowledge and belief.




 Notary Public

02-29-2016