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June 24, 2019

**VIA ELECTRONIC AND FIRST-CLASS MAIL**

Mr. Claudio J. Pavia  
 Attorney  
 Federal Election Commission  
 1050 First Street, NE  
 Washington, DC 20463

Re: MUR 7191—Response of Freedom for All Americans (Paul Kilgore, Treasurer) and RAND PAC (Kevin Broghamer, Treasurer)

Dear Mr. Pavia:

I write on behalf of my clients, Freedom for All Americans (f.k.a. Rand Paul for President) and Reinventing a New Direction PAC (“RAND PAC”). I understand the Commission found reason to believe that RAND PAC made in-kind contributions to Freedom for All Americans under 11 C.F.R. § 110.2(l) and that Freedom for All Americans remedied general-election contributions in an untimely fashion. The Committees’ response to the Commission’s preliminary finding is below.

**I. RAND PAC Did Not Make an In-Kind Contribution to Freedom for All Americans under 11 C.F.R. § 110.2(l).**

Commission rules stipulate that a multicandidate committee’s expenditure was an in-kind contribution to a presidential candidate if *both* of the following conditions were met:

- The expenditure was to procure a particular “covered” category of good or service, meaning that the expenditure was for: (1) “Polling expenses for determining the favorability, name recognition, or relative support level of the candidate involved”; (2) “Compensation paid to employees, consultants, or vendors for services rendered in connection with establishing and staffing offices in States ... other than offices in the candidate’s home state and in or near the District of Columbia”; or (3) “[R]ent, utilities, office supplies and equipment in connection with establishing and staffing offices in States ... other than offices in the candidate’s home state and in or near the District of Columbia.”<sup>1</sup>
- The presidential candidate “accepted,” “received,” “requested,” “suggested,” “was materially involved in the decision to provide,” or “was involved in substantial discussions about [the] provision” of the good or service secured with the expenditure.<sup>2</sup>

<sup>1</sup> 11 C.F.R. § 110.2(l)(1)(iii).

<sup>2</sup> 11 C.F.R. § 110.2(l)(1)(ii).

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 FEDERAL COUNSEL

In promulgating this provision, the Commission chose to “narrow [its] focus” so that an expenditure would be treated as an in-kind contribution only in “situations that truly present the potential for evasion of the contribution and spending limits.”<sup>3</sup> An in-kind contribution, in other words, does not automatically result from a PAC’s expenditure because a leadership PAC is “worthy of the same treatment as other unauthorized committees that operate without presumptions as to their status.”<sup>4</sup>

Unfortunately, the Commission’s preliminary finding seems to rely heavily on such a discarded approach in essentially assuming that several RAND PAC’s expenditures were in-kind contributions to Freedom for Americans, since the accompanying Factual and Legal Analysis provided only easily controvertible evidence to support that finding. In truth, RAND PAC did not make an in-kind contribution to Freedom for All Americans, both because the PAC did not make an expenditure for a “covered” category of good or service and because Senator Rand Paul was not involved in securing a good or service for the PAC.

#### **A. RAND PAC Did Not Make an Expenditure for a “Covered” Good or Service**

Again, a multicandidate committee’s expenditure can be an in-kind contribution under Section 110.2(l) only if it is for a specific type of good or service. The Factual and Legal Analysis claims that certain polling, office supply, and personnel expenses were of the type “covered” by the rule and therefore counted as in-kind contributions by RAND PAC. Each Analysis claim with respect to these expense categories is rebutted separately below.

##### 1. Payments for Polling Expenses in 2013 and 2014

The Factual and Legal Analysis posits that RAND PAC’s payments to The Polling Company for “survey research” in 2013 and 2014 were an in-kind to Freedom for Americans, even while simultaneously acknowledging that those payments were made prior to that committee’s establishment and disbursed “years before the first caucus or primary of the 2016 presidential season.”<sup>5</sup> This is a particularly odd expense to identify as an in-kind contribution, given that the Commission generally treats non-public poll results that are more than 180 days old as having no value to the recipient of the polling.<sup>6</sup> Moreover, although the Commission rule at 11 C.F.R. § 110.2(l) does cover polling, only polls to “determine the favorability, name recognition, or relative support level of the candidate involved” fall under the rule<sup>7</sup> and polling of a more general nature is not covered.<sup>8</sup> RAND PAC’s polls in 2013 and 2014 were to inform its views on public policy issues and various congressional campaigns, and not to determine Senator

<sup>3</sup> 68 Fed. Reg. 47386, 47407 (Aug. 8, 2003). *See also* 68 Fed. Reg. at 47385, 47387 (Aug. 8, 2003) (“For a full discussion of pre-candidacy expenditures by multicandidate political committees that are deemed in-kind contributions, see the Explanation and Justification for 11 CFR 9034.10 below”).

<sup>4</sup> 68 Fed. Reg. 67013, 67017 (Dec. 1, 2003). *See also* Fed. Election Comm’n Adv. Op. 1986-06 (describing a full range of political activities by a leadership PAC that were not counted as in-kind contributions).

<sup>5</sup> Factual and Legal Analysis at 9.

<sup>6</sup> *See* 11 C.F.R. § 106.4(g).

<sup>7</sup> 11 C.F.R. § 110.2(l)(1)(iii)(A).

<sup>8</sup> 68 Fed. Reg. 47386, 47407 (Aug. 8, 2003).

Paul's favorability, name recognition, or support levels.<sup>9</sup> This polling expense was therefore not covered under Section 110.2(l) and could not have been an in-kind contribution under that rule.

### 2. Payments to National Retailers for Equipment and Office Supplies

The Factual and Legal Analysis asserts that RAND PAC's "payments for equipment and office supplies in Florida, Virginia, and Minnesota" were in-kind contributions.<sup>10</sup> The Commission rule at 11 C.F.R. § 110.2(l) does indeed cover office supply expenses that are incurred "in connection with establishing and staffing offices in States ... other than offices in the candidate's home state and in or near the District of Columbia."<sup>11</sup> But the Analysis fails to prove its accusation under this rule at a most basic level. The Analysis argues, for example, that itemized disbursements listing Florida and Minnesota addresses on RAND PAC's reports demonstrated that the PAC had established offices in those states, but those report entries were actually for items purchased from well-known national retailers headquartered in Florida (Office Depot)<sup>12</sup> and Minnesota (Best Buy and Target)<sup>13</sup> for RAND PAC's Washington, D.C. office.<sup>14</sup> The Analysis also makes the claim that RAND PAC had established an office in Virginia based only on the itemized addresses for retail businesses listed on PAC reports, but failed to notice that all purchases were made at Northern Virginia stores that are in close geographic proximity to RAND PAC's Washington, D.C. office.<sup>15</sup> The evidence identified by the Analysis is plainly inadequate to establish that RAND PAC made an in-kind contribution under Section 110.2(l) by incurring these expenses.

### 3. Payments for Personnel

The Factual and Legal Analysis contends that several of RAND PAC's personnel expenses were in-kind contributions under Section 110.2(l), which provides that an expenditure is an in-kind contribution if it is for "[c]ompensation paid to employees, consultants, or vendors for services rendered in connection with establishing and staffing offices in States ... other than offices in the candidate's home state and in or near the District of Columbia."<sup>16</sup> Travel reimbursements are not covered under the rule, nor are personnel expenses in general.<sup>17</sup> A

<sup>9</sup> Stafford Affidavit at 3. RAND PAC did not retain a copy of these five- and six-year-old polls.

<sup>10</sup> Factual and Legal Analysis at 8.

<sup>11</sup> 11 C.F.R. § 110.2(l)(1)(iii)(C).

<sup>12</sup> Office Depot is a national retailer headquartered at 6600 North Military Trail, Boca Raton, FL 33496 (<https://www.officedepot.com/a/companyinfo/contactus/>). This is the address listed on RAND PAC's reports for the supposed "Florida office expenses," as shown on Attachment A.

<sup>13</sup> Best Buy is a national retailer headquartered at 7601 Penn Avenue South, Richfield, MN 55423 (<http://www.bestbuy-jobs.com/corporate/>). Target is a national retailer headquartered at 1000 Nicolett Mall, Minneapolis, MN 55403 (<https://corporate.target.com/press/corporate>). These are the addresses listed on RAND PAC's reports for the supposed "Minnesota office expenses," as shown on Attachment A.

<sup>14</sup> Stafford Affidavit at 7.

<sup>15</sup> Stafford Affidavit at 7. *See also* Attachment A.

<sup>16</sup> 11 C.F.R. § 110.2(l)(1)(iii)(B).

<sup>17</sup> *See, e.g.*, FEC Matter Under Review 6926 Factual and Legal Analysis ("Some of the remaining goods and services paid for by OPAC, such as travel, conference services, lodging, catering, and printing ..., while occurring during the pre-candidacy period, are not the types of goods and services that qualify for reimbursement under section 110.2(1).").

personnel expense must be “compensation” that is specifically for “establishing and staffing offices” in order to be a potential in-kind contribution under Section 110.2(l).<sup>18</sup>

The Factual and Legal Analysis, for instance, expresses the view that RAND PAC’s “payroll expenses in Ohio” were “compensation paid to ... consultants or vendors for services rendered in connection with establishing and staffing” an office in that state.<sup>19</sup> Those expenses had nothing to do with establishing an Ohio office, though, since RAND PAC never maintained an office there.<sup>20</sup> Even a cursory review of this supposed evidence would have revealed that the only “payroll expense” payments with an Ohio address were all made to Paycor, Inc., the prominent Cincinnati-based human resources company that served as RAND PAC’s general payroll processor.<sup>21</sup> The fact that a national vendor used by RAND PAC, along with thousands of other customers, happens to be located in Ohio obviously does not indicate that the PAC established an office there or that the PAC made an in-kind contribution under Section 110.2(l) by making these expenditures.

The Factual and Legal Analysis also declares that RAND PAC’s payments to Jonathan Van Norman were “compensation paid to ... consultants or vendors for services rendered in connection with establishing and staffing” an office in Iowa.<sup>22</sup> A sizable portion of RAND PAC’s payments (\$2,800) to Mr. Van Norman do not fall within the scope of Section 110.2(l), though, given that they were for “mileage reimbursements” associated with PAC travel.<sup>23</sup> Consultant fees paid to Mr. Van Norman were to arrange RAND PAC activities in Iowa and not for the purpose of establishing and staffing an office in Iowa.<sup>24</sup> RAND PAC has engaged in sustained support of Republican Party candidates in the state that has extended well before and after Senator Paul’s 2016 presidential run, by holding fundraising events for other candidates<sup>25</sup> and by making \$36,700 in contributions to Iowa candidates and committees.<sup>26</sup> The Analysis makes much of the fact that Senator Paul’s presidential campaign subsequently hired Mr. Van Norman to work in Iowa later in the election cycle, but the Commission has never indicated that a campaign is restricted in hiring a consultant previously retained by a leadership PAC. The touchstone is whether the PAC paid a consultant to “establish and staff” an office. RAND PAC never maintained an office in Iowa, and the Paul presidential campaign did not even open its Iowa office until July 2015.<sup>27</sup> RAND PAC’s payments to Mr. Van Norman were not to “establish and staff” an Iowa office and they were therefore not an in-kind contribution under Section 110.2(l).

<sup>18</sup> 68 Fed. Reg. 47386, 47407 (Aug. 8, 2003).

<sup>19</sup> Factual and Legal Analysis at 8.

<sup>20</sup> Stafford Affidavit at 7.

<sup>21</sup> See Attachment B.

<sup>22</sup> Factual and Legal Analysis at 8.

<sup>23</sup> See Attachment C.

<sup>24</sup> Stafford Affidavit at 5.

<sup>25</sup> See, e.g., RAND PAC Press Release (2014) (describing appearances at fundraising events to benefit like-minded candidates and Republican Party committees), <http://randpac.com/senator-rand-paul-kicks-state-wide-tour-iowa/>.

<sup>26</sup> See Attachment D.

<sup>27</sup> Josh Hafner, *Rand Paul Announces Statewide Iowa Tour July 1-2*, Des Moines Register (June 22, 2015), <https://www.desmoinesregister.com/story/news/politics/2015/06/22/rand-paul-announces-july-iowa-tour/29122333/>.

Finally, the Factual and Legal Analysis focuses on payments made to Rachel Kania as “compensation paid to ... consultants or vendors for services rendered in connection with establishing and staffing” an office in Texas, which would constitute an in-kind contribution under Section 110.2(l). The Analysis keys in particularly on a RAND PAC press release announcing the opening of a “tech office,” noting Ms. Kania’s hire, and using the word “campaign” to describe the role of the office and Ms. Kania.<sup>28</sup> The press release’s use of the word “campaign” should not be blown out of proportion. The release was using “campaign” in the colloquial sense to connote a concerted political effort. This press release was certainly not a vehicle for announcing Senator Paul’s presidential candidacy, as the Analysis suggests. RAND PAC paid Ms. Kania only to arrange events that it held in connection with the 2015 South by Southwest Festival in March 2015.<sup>29</sup> As with the other personnel expenses identified by the Analysis, then, payments to Ms. Kania were not an in-kind contribution under Section 110.2(l).

### **B. Senator Paul Was Not Involved in Securing Goods and Services for RAND PAC**

Under the Commission rule at 11 C.F.R. § 110.2(l), a PAC expenditure does not result in an in-kind contribution, even if it is for a “covered” good or service, if the candidate is not involved in procuring the good or service.<sup>30</sup> As mentioned above, RAND PAC does not believe that the polling, office supply, and personnel expenses identified by the Factual and Legal Analysis were “covered” goods and services. But even if the Commission somehow takes the position that those goods and services were of the type covered by Section 110.2(l), RAND PAC’s expenditures were not in-kind contributions under that rule because Senator Paul did not request, suggest, receive, have material involvement in, or engage in substantial discussions about any of the services listed in the Analysis. RAND PAC’s Executive Director commissioned the polling research that was conducted in 2013 and 2014, authorized the purchase of office supplies, and secured the services of personnel, all without involvement from Senator Paul.<sup>31</sup> Consequently, RAND PAC’s expenditures for these goods and services cannot be considered in-kind contributions under Section 110.2(l).

## **II. Freedom for All Americans Has Remedied All Outstanding General-Election Contributions**

As previously stated in prior filings, Freedom for All Americans has already remedied all outstanding general-election contributions through refunds or redesignations, and the committee did so prior to the issuance of a Reports Analysis Division referral. No interest is served by dedicating additional resources to an issue that has already been resolved by the committee itself.<sup>32</sup>

<sup>28</sup> Factual and Legal Analysis at 5, 8.

<sup>29</sup> RAND PAC YouTube Channel, *Thank You SXSW* (2015), <https://www.youtube.com/watch?v=V4Rv8BL0Qw8>. See also RAND PAC Press Release (2015), <http://randpac.com/senator-rand-paul-speak-sxsw/>. See also Stafford Affidavit at 4.

<sup>30</sup> 68 Fed. Reg. 47386, 47407-47408 (Aug. 8, 2003) (stating that the final rule “narrow[s] the coverage to situations where there is some involvement of the benefiting candidate”).

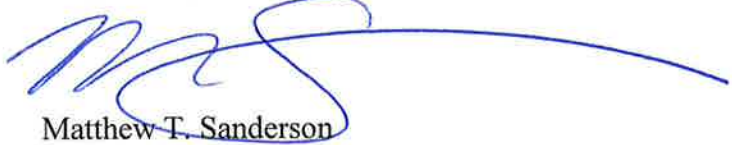
<sup>31</sup> Stafford Affidavit at 3-6.

<sup>32</sup> See, e.g., FEC Matter Under Review 6811, *First General Counsel’s Report* (recommending dismissal when the respondent had already remedied issue with general-election contributions).

**III. Conclusion**

RAND PAC did not make an in-kind contribution to Freedom for All Americans under 11 C.F.R. § 110.2(l), both because the PAC did not make an expenditure for a “covered” category of good or service and because Senator Rand Paul was not involved in securing any of these goods or services for the PAC. Moreover, Freedom for All Americans has already completed the process of remedying all outstanding general-election contributions through refund or redesignation, and no further action from the Commission is necessary to advance that process. Accordingly, RAND PAC and Freedom for All Americans respectfully suggest that the Commission exercise its discretion, reconsider its preliminary finding, and dismiss this Matter.

Respectfully Submitted,



Matthew T. Sanderson

Member

Caplin & Drysdale, Chartered

**BEFORE THE FEDERAL ELECTION COMMISSION  
Washington, D.C.**

\_\_\_\_\_  
In the Matter of: )  
 )  
Complaint of J. Russell Lloyd )  
\_\_\_\_\_)

**No. MUR 7191**

**Affidavit of Douglass Stafford**

I, Douglass Stafford, being duly sworn, hereby declare as follows:

1. My name is Douglass Stafford. I have served as the Executive Director of Reinventing a New Direction PAC (“RAND PAC”) since 2013, and I attest to all of the statements herein as a matter of my first-hand, personal experience in managing and directing RAND PAC’s affairs in that capacity.
2. RAND PAC has not made any expenditures to date for the purpose of influencing Senator Rand Paul’s election to public office.
3. RAND PAC paid The Polling Company to conduct survey research in 2013 and 2014. This research was to inform RAND PAC’s views on public policy issues and campaigns around the country. This research was not for the purpose of determining Senator Rand Paul’s favorability, name recognition, or support levels. I personally commissioned this research. Senator Rand Paul was not involved in commissioning this research.
4. RAND PAC paid Rachel Kania to arrange events that it held in March 2015 in Austin, Texas at the South by Southwest Festival. I arranged to hire Ms. Kania for this purpose. Senator Rand Paul was not involved in securing her services for RAND PAC. RAND PAC did not pay Ms. Kania to perform any services to or for the benefit of Rand Paul for President.
5. RAND PAC paid Jonathan Van Norman compensation and mileage reimbursements in connection with events and activities that it conducted in Iowa. I arranged to hire Mr. Van Norman for this purpose. Senator Rand Paul was not involved in securing Mr. Van Norman’s services for RAND PAC. RAND PAC did not pay Mr. Van Norman to perform any services to or for the benefit of Rand Paul for President.
6. Senator Rand Paul has served as the Honorary Chairman of RAND PAC but does not request, suggest, engage in discussions about, or otherwise have involvement in securing services from RAND PAC’s consultants and employees.

7. RAND PAC has maintained an office in Washington, D.C. Any expenditures for office supplies have been to secure items for that office.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

  
Douglass Stafford

SWORN TO AND SUBSCRIBED before me, the undersigned Notary Public, this 24th day of June, 2019 at Washington, D.C.

  
Notary Public Signature

My Commission Expires:

MARY E. NEAL  
NOTARY PUBLIC DISTRICT OF COLUMBIA  
My Commission Expires October 14, 2023





# **Attachment A**

PAYEENAME	STREET	CITY	STATE	ZIP	TXNDTE	AMT	TRANSTYPE
Apple Store	2700 Clarendon Boulevard	Arlington	VA	22201	08/15/2011	\$51.40	Other Federal Operating Expenditures
Target	1000 Nicollet Mall	Minneapolis	MN	55403	12/16/2011	\$69.87	Other Federal Operating Expenditures
Target	1000 Nicollet Mall	Minneapolis	MN	55403	12/11/2012	\$62.42	Other Federal Operating Expenditures
Target	1000 Nicollet Mall	Minneapolis	MN	55403	04/29/2013	\$97.62	Other Federal Operating Expenditures
Apple Store	2700 Clarendon Boulevard	Arlington	VA	22201	05/13/2013	\$135.52	Other Federal Operating Expenditures
Best Buy	7601 Penn Ave S	Richfield	MN	55423	06/27/2013	\$713.99	Other Federal Operating Expenditures
Best Buy	7601 Penn Ave S	Richfield	MN	55423	10/21/2013	\$381.59	Other Federal Operating Expenditures
Best Buy	7601 Penn Ave S	Richfield	MN	55423	10/21/2013	\$2,469.76	Other Federal Operating Expenditures
Target	1000 Nicollet Mall	Minneapolis	MN	55403	10/21/2013	\$254.18	Other Federal Operating Expenditures
Best Buy	7601 Penn Ave S	Richfield	MN	55423	11/18/2013	\$417.97	Other Federal Operating Expenditures
Target	1000 Nicollet Mall	Minneapolis	MN	55403	11/18/2013	\$7.26	Other Federal Operating Expenditures
Apple Store	2700 Clarendon Boulevard	Arlington	VA	22201	11/19/2013	\$886.13	Other Federal Operating Expenditures
Best Buy	7601 Penn Ave S	Richfield	MN	55423	11/19/2013	\$105.99	Other Federal Operating Expenditures
Apple Store	2700 Clarendon Boulevard	Arlington	VA	22201	11/25/2013	\$1,005.03	Other Federal Operating Expenditures
Office Depot	6600 N Military Trail	Boca Raton	FL	33496	12/03/2013	\$86.04	Other Federal Operating Expenditures
Office Depot	6600 N Military Trail	Boca Raton	FL	33496	12/05/2013	\$8.45	Other Federal Operating Expenditures
Office Depot	6600 N Military Trail	Boca Raton	FL	33496	12/06/2013	\$116.98	Other Federal Operating Expenditures
Office Depot	6600 N Military Trail	Boca Raton	FL	33496	01/07/2014	\$184.73	Other Federal Operating Expenditures
Apple Store	2700 Clarendon Boulevard	Arlington	VA	22201	01/21/2014	\$1,015.38	Other Federal Operating Expenditures
Office Depot	6600 N Military Trail	Boca Raton	FL	33496	01/23/2014	\$44.28	Other Federal Operating Expenditures
Office Depot	6600 N Military Trail	Boca Raton	FL	33496	02/07/2014	\$216.98	Other Federal Operating Expenditures
Office Depot	6600 N Military Trail	Boca Raton	FL	33496	02/21/2014	\$57.80	Other Federal Operating Expenditures
Office Depot	6600 N Military Trail	Boca Raton	FL	33496	02/24/2014	\$169.18	Other Federal Operating Expenditures
Office Depot	6600 N Military Trail	Boca Raton	FL	33496	03/10/2014	\$42.23	Other Federal Operating Expenditures
Best Buy	7601 Penn Ave S	Richfield	MN	55423	03/12/2014	\$673.05	Other Federal Operating Expenditures
Office Depot	6600 N Military Trail	Boca Raton	FL	33496	04/18/2014	\$31.13	Other Federal Operating Expenditures
Target	1000 Nicollet Mall	Minneapolis	MN	55403	05/06/2014	\$126.49	Other Federal Operating Expenditures
Office Depot	6600 N Military Trail	Boca Raton	FL	33496	05/06/2014	\$159.54	Other Federal Operating Expenditures
Best Buy	7601 Penn Ave S	Richfield	MN	55423	06/04/2014	\$377.67	Other Federal Operating Expenditures
Target	1000 Nicollet Mall	Minneapolis	MN	55403	06/04/2014	\$6.34	Other Federal Operating Expenditures
Office Depot	6600 N Military Trail	Boca Raton	FL	33496	06/04/2014	\$61.75	Other Federal Operating Expenditures
Rite Aid	6053 Leesburg pk	Falls Church	VA	22041	07/02/2014	\$108.50	Other Federal Operating Expenditures
Office Depot	6600 N Military Trail	Boca Raton	FL	33496	07/02/2014	\$198.18	Other Federal Operating Expenditures

Apple Store	2700 Clarendon Boulevard	Arlington	VA	22201	08/08/2014	\$1,307.34	Other Federal Operating Expenditures
Office Depot	6600 N Military Trail	Boca Raton	FL	33496	08/08/2014	\$52.34	Other Federal Operating Expenditures
Office Depot	6600 N Military Trail	Boca Raton	FL	33496	09/03/2014	\$163.12	Other Federal Operating Expenditures
Best Buy	7601 Penn Ave S	Richfield	MN	55423	10/07/2014	\$490.74	Other Federal Operating Expenditures
Office Depot	6600 N Military Trail	Boca Raton	FL	33496	10/07/2014	\$50.48	Other Federal Operating Expenditures
Best Buy	7601 Penn Ave S	Richfield	MN	55423	11/04/2014	\$95.38	Other Federal Operating Expenditures
Office Depot	6600 N Military Trail	Boca Raton	FL	33496	11/04/2014	\$34.92	Other Federal Operating Expenditures
Office Depot	6600 N Military Trail	Boca Raton	FL	33496	11/04/2014	\$23.32	Other Federal Operating Expenditures
Office Depot	6600 N Military Trail	Boca Raton	FL	33496	11/04/2014	\$42.29	Other Federal Operating Expenditures
Office Depot	6600 N Military Trail	Boca Raton	FL	33496	11/04/2014	\$40.72	Other Federal Operating Expenditures
Rite Aid	6053 lessburg pk	Falls Church	VA	22041	11/07/2014	\$27.00	Other Federal Operating Expenditures
Apple Store	2700 Clarendon Boulevard	Arlington	VA	22201	12/01/2014	\$105.70	Other Federal Operating Expenditures
Apple Store	2700 Clarendon Boulevard	Arlington	VA	22201	12/01/2014	\$665.17	Other Federal Operating Expenditures
Office Depot	6600 N Military Trail	Boca Raton	FL	33496	12/01/2014	\$30.66	Other Federal Operating Expenditures
Office Depot	6600 N Military Trail	Boca Raton	FL	33496	12/01/2014	\$49.69	Other Federal Operating Expenditures
Office Depot	6600 N Military Trail	Boca Raton	FL	33496	12/01/2014	\$81.72	Other Federal Operating Expenditures
Apple Store	2700 Clarendon Boulevard	Arlington	VA	22201	01/07/2015	\$3,778.63	Other Federal Operating Expenditures
Cellular Sales	7457 Hillwood Drive	Gainesville	VA	20155	01/07/2015	\$1,023.96	Other Federal Operating Expenditures
Office Depot	6600 N Military Trail	Boca Raton	FL	33496	02/03/2015	\$105.93	Other Federal Operating Expenditures
Office Depot	6600 N Military Trail	Boca Raton	FL	33496	02/17/2015	\$111.32	Other Federal Operating Expenditures
Office Depot	6600 N Military Trail	Boca Raton	FL	33496	03/03/2015	\$118.55	Other Federal Operating Expenditures
Office Depot	6600 N Military Trail	Boca Raton	FL	33496	03/03/2015	\$199.29	Other Federal Operating Expenditures
Best Buy	7601 Penn Ave S	Richfield	MN	55423	04/03/2015	\$192.62	Other Federal Operating Expenditures
Best Buy	7601 Penn Ave S	Richfield	MN	55423	04/03/2015	\$145.17	Other Federal Operating Expenditures
Office Depot	6600 N Military Trail	Boca Raton	FL	33496	04/03/2015	\$42.29	Other Federal Operating Expenditures
Office Depot	6600 N Military Trail	Boca Raton	FL	33496	04/03/2015	\$41.96	Other Federal Operating Expenditures
Office Depot	6600 N Military Trail	Boca Raton	FL	33496	04/03/2015	\$77.12	Other Federal Operating Expenditures
Best Buy	7601 Penn Ave S	Richfield	MN	55423	05/01/2015	\$84.79	Other Federal Operating Expenditures
Best Buy	7601 Penn Ave S	Richfield	MN	55423	05/01/2015	\$260.73	Other Federal Operating Expenditures
Office Depot	6600 N Military Trail	Boca Raton	FL	33496	05/01/2015	\$68.79	Other Federal Operating Expenditures
Office Depot	6600 N Military Trail	Boca Raton	FL	33496	05/01/2015	\$315.32	Other Federal Operating Expenditures

# **Attachment B**

PAYEENAME	STREET	CITY	STATE	ZIP	TXNDTE	AMT	TRANSTYPE
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	06/05/2013	\$63.50	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	07/02/2013	\$66.00	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	07/15/2013	\$3.50	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	08/01/2013	\$69.50	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	08/23/2013	\$66.60	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	09/04/2013	\$69.50	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	10/01/2013	\$66.00	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	10/15/2013	\$53.50	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	10/17/2013	\$60.50	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	10/31/2013	\$50.00	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	11/18/2013	\$50.00	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	12/02/2013	\$50.00	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	12/19/2013	\$50.00	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	12/30/2013	\$98.50	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	01/02/2014	\$69.50	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	01/16/2014	\$50.00	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	02/03/2014	\$50.00	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	02/14/2014	\$50.00	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	03/04/2014	\$50.00	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	03/17/2014	\$50.00	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	04/07/2014	\$59.50	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	04/17/2014	\$59.50	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	05/01/2014	\$54.50	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	05/19/2014	\$54.50	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	06/02/2014	\$54.50	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	06/17/2014	\$54.50	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	07/02/2014	\$76.00	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	07/16/2014	\$72.50	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	08/04/2014	\$59.50	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	08/15/2014	\$59.50	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	09/02/2014	\$57.00	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	09/18/2014	\$65.50	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	10/02/2014	\$63.00	Other Federal Operating Expenditures

Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	10/16/2014	\$57.00	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	11/03/2014	\$57.00	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	11/14/2014	\$63.00	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	12/02/2014	\$59.50	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	12/17/2014	\$59.50	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	12/22/2014	\$47.50	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	01/01/2015	\$59.50	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	01/26/2015	\$137.00	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	02/17/2015	\$47.00	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	10/16/2014	\$4,512.80	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	11/03/2014	\$4,512.80	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	11/14/2014	\$4,560.03	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	06/05/2013	\$2,355.14	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	07/02/2013	\$5,624.51	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	08/01/2013	\$5,482.51	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	08/26/2013	\$14.60	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	08/30/2013	\$5,386.11	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	10/01/2013	\$5,318.51	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	10/17/2013	\$2,460.89	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	10/31/2013	\$3,549.26	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	11/15/2013	\$3,549.26	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	12/02/2013	\$3,549.26	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	12/18/2013	\$3,543.04	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	12/24/2013	\$14.23	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	12/26/2013	\$10.00	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	12/26/2013	\$8.00	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	01/02/2014	\$3,759.45	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	01/16/2014	\$3,712.45	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	02/03/2014	\$3,584.45	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	02/14/2014	\$3,751.95	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	03/03/2014	\$3,686.09	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	03/17/2014	\$3,568.91	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	04/03/2014	\$3,688.61	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	04/17/2014	\$3,714.40	Other Federal Operating Expenditures

Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	05/01/2014	\$3,706.42	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	05/16/2014	\$3,706.42	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	06/02/2014	\$3,706.42	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	06/16/2014	\$3,706.42	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	07/02/2014	\$4,926.95	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	07/16/2014	\$10,979.00	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	08/01/2014	\$4,705.99	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	08/15/2014	\$4,431.48	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	09/02/2014	\$4,424.39	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	09/17/2014	\$5,515.05	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	10/02/2014	\$4,671.65	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	12/02/2014	\$4,470.73	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	12/17/2014	\$4,074.43	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	12/18/2014	\$2,072.04	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	12/18/2014	\$1,381.36	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	12/18/2014	\$345.34	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	12/19/2014	\$2,334.24	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	12/19/2014	\$930.26	Other Federal Operating Expenditures
Paycor, Inc.	644 Linn St	Cincinnati	OH	45203	12/30/2014	\$3,821.03	Other Federal Operating Expenditures

# **Attachment C**



PAYEENAME	STREET	CITY	STA	ZIP	TXNDTE	AMT	TRANSTYPE	DESCRIPTION
Jonathan Van Norman	333 East Tenth Apt 510	Dubuque	IA	52001	03/26/2015	\$538.65	Other Fed Operating Expend	Mileage Reimbursement
Jonathan Van Norman	333 East Tenth Apt 510	Dubuque	IA	52001	03/26/2015	\$538.65	Other Fed Operating Expend	Mileage Reimbursement
Jonathan Van Norman	333 East Tenth Apt 510	Dubuque	IA	52001	04/16/2015	\$1,550.00	Other Fed Operating Expend	Consult/Travel Reimburse
Jonathan Van Norman	333 East Tenth Apt 510	Dubuque	IA	52001	04/16/2015	\$135.00	Other Fed Operating Expend	Mileage Reimbursement
Jonathan Van Norman	333 East Tenth Apt 510	Dubuque	IA	52001	04/24/2015	\$97.20	Other Fed Operating Expend	Mileage Reimbursement
Jonathan Van Norman	333 East Tenth Apt 510	Dubuque	IA	52001	04/30/2015	\$600.00	Other Fed Operating Expend	Advance Consulting

# **Attachment D**

PAYEENAME	STREET	CITY	STATE	ZIP	TXNDTE	AMT	TRANSTYPE
Republican Party Of Iowa - Fed	621 E 9th Street	Des Moines	IA	50309	10/12/2012	\$5,000.00	Political Contribution
Republican Party Of Iowa - Stat	621 E 9th Street	Des Moines	IA	50309	10/12/2012	\$5,000.00	Political Contribution
Republican Party Of Iowa - Fed	621 E 9th Street	Des Moines	IA	50309	01/24/2013	\$5,000.00	Political Contribution
Iowans for Sam Clovis	P.O. Box 3835	Sioux City	IA	51102	09/03/2014	\$1,700.00	Political Contribution
Joni Ernst for US Senate Inc.	P.O. Box 93441	Des Moines	IA	50393	10/14/2014	\$2,500.00	Political Contribution
Young for Iowa, Inc.	P.O. Box 162	VAN METE	IA	50261	10/14/2014	\$1,000.00	Political Contribution
Blum For Congress	2728 Asbury Road S	Dubuque	IA	52001	10/14/2014	\$1,000.00	Political Contribution
Friends of Jason Schultz	Box 70, 611 Cedar S	Schleswig	IA	51461	10/14/2014	\$1,000.00	Political Contribution
IA House Majority Fund	621 E 9th Street	Des Moines	IA	50309	10/14/2014	\$1,000.00	Political Contribution
IA Senate Majority Fund	621 E 9th Street	Des Moines	IA	50309	10/14/2014	\$1,000.00	Political Contribution
Iowans for Sam Clovis	P.O. Box 3835	Sioux City	IA	51102	10/14/2014	\$1,000.00	Political Contribution
Kaufmann for State House	1527 330th Street	Wilton	IA	52778	10/14/2014	\$1,000.00	Political Contribution
King for Congress	P.O. Box 398	Wall Lake	IA	51466	10/14/2014	\$1,000.00	Political Contribution
Miller-Meeks for Congress	P.O. Box 1570	Ottumwa	IA	52501	10/14/2014	\$1,000.00	Political Contribution
Mosiman for State Auditor	P.O. Box 188	Ames	IA	50010	10/14/2014	\$1,000.00	Political Contribution
Pate for Iowa	P.O. Box 11575	Cedar Rapids	IA	52410	10/14/2014	\$1,000.00	Political Contribution
Shawn Dietz for Iowa	514 2nd Ave. NE	Hampton	IA	50441	10/14/2014	\$1,000.00	Political Contribution
Shipley for Iowa	803 S. 4th Street	Fairfield	IA	52556	10/14/2014	\$1,000.00	Political Contribution
Smith for Senate	2036 E. 48th Street	Davenport	IA	52807	10/14/2014	\$1,000.00	Political Contribution
Blum For Congress	2728 Asbury Road S	Dubuque	IA	52001	03/28/2017	\$1,000.00	Political Contribution
Blum For Congress	2728 Asbury Road S	Dubuque	IA	52001	10/25/2018	\$2,500.00	Political Contribution