

**BEFORE THE UNITED STATES
FEDERAL ELECTION COMMISSION**

Rick Scott
PO Box 3791
Tallahassee, FL 32315;

Rick Scott for Florida
PO Box 3791
Tallahassee, FL 32315; and

New Republican PAC and Mori Hosseini, Treasurer
224 E. 6th Ave.
Tallahassee, FL 32303

MUR No. 7370

OFFICE OF
GENERAL COUNSEL
2018 APR 23 AM 11:56

SUPPLEMENTAL COMPLAINT

This Supplemental Complaint is filed pursuant to 52 U.S.C. § 30109(a)(1) against Rick Scott, Rick Scott for Florida, New Republican PAC, and Mori Hosseini, Treasurer (collectively, “Respondents”) for multiple violations of the Federal Election Campaign Act of 1971, as amended (the “Act”). On April 10, Complainant filed a Complaint against Respondents alleging that Scott used the super PAC, New Republican PAC, of which he is the chair, to raise and spend soft money to support his candidacy for U.S. Senate. Since the Complaint was initially filed, additional evidence has come to light supporting this conclusion.

On April 12th, 2018, Marc Caputo, a reporter with *Politico*, released a copy of a polling memo that was addressed to New Republican PAC. The memo, dated March 29, 2018, described the results of a poll that surveyed likely voters in Florida “between March 10 and 13, 2018.”¹ According to its FEC reports, the PAC appears to have paid for this on March 14.² The poll tested Scott’s competitiveness in a match-up against incumbent Senator Bill Nelson. Meanwhile, just days before the poll went into the field, it was reported that Scott hosted a fundraising dinner at his home for donors to the PAC.³

¹ An excerpt of the memorandum is attached as Exhibit M.

² New Republican PAC, 2018 April Quarterly Report (disbursement to “McLaughlin & Associates Inc.” for “Survey Research”). Attached as Exhibit N.


³ *Washington Post* (March 3, 2018), Exhibit H.

In addition, according to New Republican PAC's FEC reports, the PAC appears to have paid for its website redesign on March 29, 2018, well before Scott announced his candidacy.⁴ Thus, it is clear that New Republican PAC was conducting polling for Scott and reorganizing its website while Scott was still very much involved in the PAC's operations as its chair. This use of soft money to advance his campaign violates the Act and Commission regulations.

Additional sources demonstrate the inter-relationship between New Republican PAC and Scott's campaign. On March 29, Jenny Drucker – whose firm, Drucker Lawhon, was paid by New Republican PAC \$44,653.54 in 2018 (including \$37,205.45 on March 21, 2018) – sent a fundraising solicitation to prospective donors seeking contributions to Rick Scott for Florida, Scott's principal campaign committee.^{5,6} That solicitation identified Rick Scott for Florida's address as 224 E. 6th Ave., Tallahassee, FL 32303. This is the very same address that was used by New Republican PAC until it filed an amended statement of organization on April 5.⁷ Thus it appears that Rick Scott for Florida and New Republican PAC shared the same fundraiser and, until only recently, the same address.

For the reasons described herein and in the Complaint, the Commission should find reason to believe that Respondents have violated the Act, impose the maximum civil penalty permitted by law, enjoin respondents from any and all future violations, and impose such additional remedies as it finds necessary and appropriate.

Respectfully Submitted,


 End Citizens United by,
 Matt Burgess
 P.O. Box 66005
 Washington, DC 20035

Sworn to and subscribed before me this 17th day of April, 2018



Natasha Santana-Valera
 Notary Public
⁴ New Republican PAC, 2018 April Quarterly Report (disbursement to "Integrated Web Strategy" for "Website Build"). Attached as Exhibit N.

⁵ An excerpt of the email solicitation is attached as Exhibit O.

⁶ New Republican PAC, 2018 April Quarterly Report (disbursements to "Drucker Lawhon"). Attached as Exhibit P.

⁷ New Republican PAC, Statement of Organization 2018, Amendment 2. Attached as Exhibit Q.

EXHIBIT M

McLaughlin & Associates: Polling memo to New Republican on Florida U.S. Senate Race
By: Jim McLaughlin & Stuart Polk
3/29/2018



To: New Republican
From: Jim McLaughlin & Stuart Polk
Re: Florida U.S. Senate Race – Executive Survey Summary
Date: March 29, 2018

Summary

The survey results of 800 likely voters in Florida clearly show that Democratic Senator Bill Nelson would be vulnerable in a general election against Republican Rick Scott. On the ballot, Rick Scott has a 1-point lead (47% to 46%). Rick Scott has a stronger favorable rating than Bill Nelson who is underperforming on key benchmarks for an incumbent. This race would be one of the most highly competitive and watched races in the country. With the right amount of resources, Rick Scott would be able to defeat Bill Nelson.

Key Findings

- Bill Nelson is under 50% on the ballot, which is a sign of a vulnerable incumbent.
- Rick Scott has a 1-point lead on Bill Nelson (47% to 46%) with 6% undecided.
- The ballot is heavily polarized along party lines with Rick Scott leading among Republicans 84% to 12% while Bill Nelson is ahead 80% to 15% among Democrats
- Non-Party-Affiliated voters lean in favor of Rick Scott 46% to 44% on the ballot.
- The majority has a favorable opinion of Rick Scott (53% favorable to 36% unfavorable).
- Bill Nelson's favorables are significantly under 50% (41% favorable to 25% unfavorable), which is a troubling indicator for an incumbent. It's apparent voters aren't that excited about Bill Nelson.

Methodology

This Florida statewide survey was conducted among 800 likely voters between March 10 and 13, 2018. In addition, an oversample was conducted among 76 likely voters in targeted media markets. The oversample was weighted proportionately into the original 800 sample. All interviews were conducted by professional interviewers via telephone. The sample included a mix of 59% landline and 41% cell phone interviews. Interview selection was at random within predetermined election units. These units were structured to statistically correlate with actual voter distributions in a general election. The accuracy of the sample of 800 likely voters is within +/- 3.4% at a 95% confidence interval. The results in this summary have been rounded and may not equal 100%

EXHIBIT N

FEC

New Republican PAC, Disbursements to Integrated Web Strategy for "Website Build" & to McLaughlin & Associates Inc. for "Survey Research"
Accessed 4/16/2018

SCHEDULE B (FEC Form 3X) ITEMIZED DISBURSEMENTS

Use separate schedule(s) for each category of the Detailed Summary Page		FOR LINE NUMBER: (check only one)		PAGE 75 OF 91	
<input checked="" type="checkbox"/> 21b	<input type="checkbox"/> 22	<input type="checkbox"/> 23	<input type="checkbox"/> 26	<input type="checkbox"/> 27	
<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c	<input type="checkbox"/> 29	<input type="checkbox"/> 30b	

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)
NEW REPUBLICAN PAC

Full Name (Last, First, Middle Initial)

A. INTEGRATED WEB STRATEGY

Mailing Address **5330 N. 12TH STREET**

City **PHOENIX** State **AZ** Zip Code **85014**

Purpose of Disbursement
WEBSITE BUILD

Candidate Name

Office Sought: ☐ House ☐ Senate ☐ President

Disbursement For: ☐ Primary ☐ General ☐ Other (specify) ▼

State: District:

Date of Disbursement
MM / DD / YYYY
03 / 29 / 2018

FEC Identification Number
C

Transaction ID : **1077**

Amount of Each Disbursement this Period
10000.00

☐ Memo Item

Full Name (Last, First, Middle Initial)

B. MCLAUGHLIN & ASSOCIATES, INC.

Mailing Address **566 S. ROUTE 303**

City **BLAUVELT** State **NY** Zip Code **10913**

Purpose of Disbursement
SURVEY RESEARCH

Candidate Name

Office Sought: ☐ House ☐ Senate ☐ President

Disbursement For: ☐ Primary ☐ General ☐ Other (specify) ▼

State: District:

Date of Disbursement
MM / DD / YYYY
03 / 14 / 2018

FEC Identification Number
C

Transaction ID : **1000**

Amount of Each Disbursement this Period
51400.00

☐ Memo Item

EXHIBIT O

Fundraising email from Jenny Drucker on behalf Rick Scott for Florida

Sent 3/29/2018

From: Jenny Drucker <jenny@druckerlawhon.com>

Date: March 29, 2018 at 5:32:05 PM GMT+2

Subject: Support Governor Scott TODAY!

Reply-To: Jenny Drucker <jenny@druckerlawhon.com>

I'm sure you saw the news that Governor Rick Scott is going to make an announcement on April 9th.

And as we lead up to that announcement and near the end of the first quarter of the election year, he could use your support TODAY! The maximum you can contribute to help him is \$5,400 per individual or \$10,800 per couple.

Please feel free to contact me with any questions - and if you are able to help now...

<https://secure.anedot.com/scottfl/donate>

To contribute by mail, please send a personal check made payable to "Rick Scott for Florida" to:

Rick Scott for Florida

224 E 6th Ave, Tallahassee, FL 32303

Please include your full name, address, email address, occupation and employer in the envelope.

Jenny Drucker

Rick Scott for Florida

EXHIBIT P

FEC

New Republican PAC, Disbursements to "Drucker Lawhon," 2018 April Quarterly Report
Accessed 4/16/2018

NAME OF COMMITTEE (In Full) NEW REPUBLICAN PAC	
Full Name (Last, First, Middle Initial)	
A. DIRECT MAIL PROCESSORS, INC.	
Mailing Address 1150 CONRAD CT	
City HAGERSTOWN	State MD Zip Code 21740
Purpose of Disbursement MAIL PROCESSING SERVICES	Category/ Type
Candidate Name	
Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President	Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼
State: District:	
Date of Disbursement MM / DD / YYYY 03 / 29 / 2018	
FEC Identification Number C	
Transaction ID : 1060	
Amount of Each Disbursement this Period 491.10	
<input type="checkbox"/> Memo Item	
Full Name (Last, First, Middle Initial)	
B. DRUCKER LAWHON	
Mailing Address 2647 JACKSON DRIVE	
City FALLS CHURCH	State VA Zip Code 22043
Purpose of Disbursement FUNDRAISING CONSULTING	Category/ Type
Candidate Name	
Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President	Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼
State: District:	
Date of Disbursement MM / DD / YYYY 03 / 21 / 2018	
FEC Identification Number C	
Transaction ID : 1039	
Amount of Each Disbursement this Period 10000.00	
<input type="checkbox"/> Memo Item	
Full Name (Last, First, Middle Initial)	
C. DRUCKER LAWHON	
Mailing Address 2647 JACKSON DRIVE	
City FALLS CHURCH	State VA Zip Code 22043
Purpose of Disbursement TRAVEL	Category/ Type
Candidate Name	
Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President	Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼
State: District:	
Date of Disbursement MM / DD / YYYY 02 / 11 / 2018	
FEC Identification Number C	
Transaction ID : 1071	
Amount of Each Disbursement this Period 5231.68	
<input type="checkbox"/> Memo Item	

NAME OF COMMITTEE (In Full)
NEW REPUBLICAN PAC

Full Name (Last, First, Middle Initial)

A. DRUCKER LAWHON

Mailing Address 2647 JACKSON DRIVE

City
FALLS CHURCH

State
VA

Zip Code
22043

Purpose of Disbursement
TRAVEL / FACILITY RENTAL / CATERING

Candidate Name

Category/
Type

Office Sought: ☐ House
☐ Senate
☐ President

Disbursement For: ☐ Primary ☐ General
☐ Other (specify) ▼

State: District:

Date of Disbursement

MM / DD / YYYY
02 / 17 / 2018

FEC Identification Number

C

Transaction ID : 1072

Amount of Each Disbursement this Period

2216.41

☐ Memo Item

Full Name (Last, First, Middle Initial)

B. DRUCKER LAWHON

Mailing Address 2647 JACKSON DRIVE

City
FALLS CHURCH

State
VA

Zip Code
22043

Purpose of Disbursement
TRAVEL / FACILITY RENTAL / CATERING / FOOD/BEVERAGE

Candidate Name

Category/
Type

Office Sought: ☐ House
☐ Senate
☐ President

Disbursement For: ☐ Primary ☐ General
☐ Other (specify) ▼

State: District:

Date of Disbursement

MM / DD / YYYY
03 / 21 / 2018

FEC Identification Number

C

Transaction ID : 1073

Amount of Each Disbursement this Period

18955.46

☐ Memo Item

Full Name (Last, First, Middle Initial)

C. DRUCKER LAWHON

Mailing Address 2647 JACKSON DRIVE

City
FALLS CHURCH

State
VA

Zip Code
22043

Purpose of Disbursement
TRAVEL / FACILITY RENTAL / CATERING / FOOD/BEVERAGE

Candidate Name

Category/
Type

Office Sought: ☐ House
☐ Senate
☐ President

Disbursement For: ☐ Primary ☐ General
☐ Other (specify) ▼

State: District:

Date of Disbursement

MM / DD / YYYY
03 / 21 / 2018

FEC Identification Number

C

Transaction ID : 1074

Amount of Each Disbursement this Period

8249.99

☐ Memo Item

EXHIBIT Q

FEC

New Republican PAC, Statement of Organization 2018, Amendment 2.
Filed 2/23/2018

Image# 201802239095523413

02/23/2018 15 : 26

PAGE 1 / 5

**FEC
FORM 1**

**STATEMENT OF
ORGANIZATION**

Office Use Only

1. NAME OF
COMMITTEE (in full)

☐

(Check if name
is changed)

Example: If typing, type
over the lines.

12FE4M5

NEW REPUBLICAN PAC

ADDRESS (number and street)

224 E 6TH AVE

☐

(Check if address
is changed)

TALLAHASSEE

CITY ▲

FL

STATE ▲

32303

ZIP CODE ▲

COMMITTEE'S E-MAIL ADDRESS

☐

(Check if address
is changed)

BEN@CROSBYOTT.COM

Optional Second E-Mail Address

COMMITTEE'S WEB PAGE ADDRESS (URL)

☐

(Check if address
is changed)

2. DATE

02 / 22 / 2018

3. FEC IDENTIFICATION NUMBER ►

C C00544544