

**BEFORE THE UNITED STATES
FEDERAL ELECTION COMMISSION**

BARRY MICHAELS
Candidate for U.S. Senate
9708 Gilespe Street,
Suite 104
Las Vegas, NV 89183
(702) 415-0905
e-mail: nevadaonly@yahoo.com

MUR: 7484

Complainant

v.

KLAS TV 8
3228 Channel 8 Dr,
Las Vegas, NV 89109
(702) 792-8888

Nexstar Media Group, Inc.
545 East John Carpenter Freeway
Suite 700
Irving, TX 75062
(972) 373-8800

KTVN-TV
Sarkes Tarzian, Inc.
4925 Energy Way
Reno, NV 89502
(775) 858-2222

Respondents,

COMPLAINT

1. This complaint is filed pursuant to 52 U.S.C. 30109(a)(1) and is based on information provided by Respondent KLAS TV.

I. THE PARTIES

OFFICE OF
GENERAL COUNSEL
2019 AUG 20 AM 9:20

1. Complainant Barry Michaels is a natural person and citizen of the United States of America, a non-partisan registered voter and an Independent Candidate for U. S. Senate residing in Las Vegas, Nevada.
2. Respondent KLAS – TV (“defendant KLAS”) is a Las Vegas television station owned and operated by Nexstar Media Group, Inc. a foreign corporation doing business in the State of Nevada.
3. Respondent KTVN is a Reno, Nevada television station owned by Sarkes Tarzian, Inc. is a foreign corporation doing business in Nevada.

OPENING STATEMENT

Today more than ever, Americans want a greater choice when casting their vote for political candidates. Our two-party system is no longer functioning as intended while Congress often standstill and remains silent. More and more voters are choosing to separate themselves from political parties and register as Independents. Nearly one third of all voters (311,388) in Nevada have disassociated themselves from either party and deserve to hear an alternative voice in the upcoming debate.

Even though Independents represent a large segment of voters, candidates who choose to run as Independent's face extensive hurdles and are often silenced by party influence. Public debates are a critical means whereby a candidate's voice can be heard and discriminating against that surely amounts to an illegal means of influencing our elective system and doing irreparable harm. Public interest is best served by allowing debates to take place with multiple candidates with different views

THE LAW

§ 11 CFR 110.13 Candidate debates.

(a) Staging organizations.

(b) Debate structure. The structure of debates staged in accordance with this section and 11 CFR 114.4(f) is left to the discretion of the staging organizations(s), provided that:

(1) Such debates include at least two candidates; and

(2) The staging organization(s) does not structure the debates to promote or advance one candidate over another.

(c) Criteria for candidate selection. For all debates, staging organization(s) must use pre-established **objective** criteria to determine which candidates may participate in a debate. For general election debates, staging organizations(s) shall not use nomination by a particular political party as the sole objective criterion to determine whether to include a candidate in a debate. For debates held prior to a primary election, caucus or convention, staging organizations may restrict candidate participation to candidates seeking the nomination of one party, and need not stage a debate for candidates seeking the nomination of any other political party or independent candidates.

STATEMENT OF FACTS

1. Complainant is one of only five candidates currently running for the U.S. Senate in Nevada and the only Independent (non-partisan) to appear on the Nevada general election ballot for 2018 election.
2. On July 30, 2018 Complainant received a three-page letter from Respondent (KLAS) (attached herein as EXHIBIT A) regarding the participation in their upcoming U.S. Senate debate scheduled for October 4, 2018.
3. Page 2, Paragraph 3, Section a – g of EXHIBIT A specifies their requirements for an active campaign needed to participate in their debate. Complainant fulfills all of the requirements in paragraphs 1 - 3.

- ✓ Complainant maintains a commercial office used as his principal campaign Headquarters.
 - ✓ Complainant maintains a campaign phone number.
 - ✓ Complainant campaign website: www.BarryForUSSenate.com
 - ✓ Complainant has appeared and continues to appear at numerous campaign events and candidate night's.
 - ✓ Complainant has a fundraising page contained on his website and a campaign Treasurer.
 - ✓ Complainant has designed and printed several pieces of campaign literature.
 - ✓ Complainant has been interviewed several times by the press and numerous articles about him can be found on the Internet.
 - ✓ Complainant also maintains a significant social media presence.
4. However, Page 3, Section 5 of EXHIBIT A lists an additional requirement. It states "a candidate must have reported, on official forms filed with the appropriate election authority, accepting \$50,000 in monetary, as opposed to in-kind, campaign contributions, at least 25 percent of which must be raised from in-state constituents."
5. According to the letter Complainant must forward all documentation to Respondent by September 6, 2018 in order to qualify for the debate. However, the FEC reporting period end September 30, 2018 and due October 15, 2018.
6. According to the statute, debate staging organizations must use "pre-established objective criteria to determine which candidates may participate in a debate." 11 C.F.R. § 110.13(c).

7. The FEC has determined that to be objective, a criterion "must be free of content bias, and not geared to the selection of certain pre-chosen participants."
8. Although the term "objective" is not defined in the regulation itself, it has generally been described by courts as referring to evidence of "the sort that can be supplied by disinterested third parties," *Bourke v. Dun & Bradstreet Corp.*, 159 F.3d 1032, 1037 (7th Cir.1998) (internal quotation and citation omitted), "that can be discovered and substantiated by external testing," *Thompson v. Sullivan*, 987 F.2d 1482, 1488-89 (10th Cir.1993), or evidence that is undistorted "by personal feelings or prejudices and that are publicly or inter-subjectively observable or verifiable, especially by scientific methods." *Association of the Bar of the City of New York v. Commissioner of Internal Revenue*, 858 F.2d 876, 880 (2d Cir.1988) (citation omitted). Objective representations have also been described "as `representations of previous and present conditions and past events, which are susceptible of exact knowledge and correct statement.'" *Id.* (quoting *United Ben. Life Ins. Co. v. Knapp*, 175 Okla. 25, 51 P.2d 963, 964 (1935))

BACKGROUND

9. On May 18, 2018, Complainant filed his petition with the Nevada Secretary of State which included 346 signatures of registered voters in Clark County, Nevada.
10. Complainant filed a financial disclosure with the Nevada Secretary of State.
11. Complainant also filed a financial disclosure with the Secretary of the U.S. Senate.

12. Complainant is one of only five candidates running for the U.S. Senate in Nevada and the only Independent (non-partisan) to appear on the general election ballot for the 2018 election.
13. Complainant has reason to believe Respondent's (KLAS) method of selection is discriminatory and has been arbitrarily and capriciously chosen without objectivity as required by the 11CFR 110.13(c).
14. Complainant has reason to believe Respondent (KLAS) operated in a manner designed to support and perpetuate the Democrat and Republican candidates by protecting them from any political competition.
15. Complainant has reason to believe Respondent's (KLAS) selection of criteria which could only be met by the Democrat and Republican candidates does not satisfy the FEC's 11CFR 110.13(c) rules of "*objective*".
16. Although the term "objective" is not defined in the FEC regulation, its has generally been described by courts as referring to evidence of the sort that can be supplied by disinterested third parties. or evidence that is undistorted by personal feelings or prejudices and that are publicly or inter-subjectively observable or verifiable, especially by scientific methods.
17. Political candidate's viability should not be measured by donated amounts. What one candidate can do with one amount, another may be able to do with half that amount. Under Respondent's policy a candidate who receives the maximum personal donation from 18 individuals would be considered a valid candidate.

IV. STATEMENT OF CASE

18. As of August 8, 2018 the Nevada Secretary of State indicates there are currently 311,388 active non-partisan registered voters in the State of Nevada (EXHIBIT ____).
19. Nevada voters who have registered non-partisan have chosen “not” to commit allegiance to any political party and deserve to hear a third and independent candidate.
20. Respondent set their selection method to include two candidates only, the Democrat and Republican while excluding anyone else.
21. Respondent currently receives revenue from both Republican and Democrat candidates through their campaigns from ads aired.

EXHIBITS

- A. Respondent’s Debate Letter
- B. Nevada Registered Voters
- C. Corporate Charter – Barry Michaels For U.S. Senate 2018
- D. 2006 Congress 3rd District Primary Results 15%+
- E. Vote Smart online listing
- F. BallotPedia online listing
- G. Nevada Secretary of State photo being sworn in
- H. U.S. Term Pledge thank you
- I. August 9, 2017 Press Release
- J. October 11, 2017 Press Release
- K. June 20, 2018 Press Release
- L. Washington Times Candidate coverage
- M. Barry Michaels website Donation Page

- N. Barry Michaels Magnetic sign
- O. Barry Michaels Twitter Page
- P. Barry Michaels Instagram Page
- Q. Barry Michaels Facebook Page
- R. Barry Michaels LinkedIn Page

VERIFICATION

The complainant listed below hereby swear under penalty of perjury that the statements made in the attached Complaint are, upon their information and belief, true. Sworn pursuant to 18 U.S.C. §1001.



Barry Michaels

Sworn to and subscribed before me this 13th day of August 2018


 Notary Public




July 27, 2018

Mr. Barry Michaels
9708 Gillespie St.
Suite 104
Las Vegas, NV 89183

Dear Mr. Michaels,

KLAS TV 8 is planning to produce a live state-wide U.S. Senate's debate at UNLV on Thursday, October 4th, 2018 from 6:30-7:30 p.m. The debate will air on KLAS (CBS) in southern Nevada and on KTVN (CBS) in northern Nevada along with a live stream on each station's respective online properties (www.lasvegasnow.com and www.ktvn.com). We are continuing to work with Univision to carry the debate statewide to reach the increasingly important Hispanic market and discussions have been started to secure a radio partner.

Enclosed, please find our Nexstar Candidate Criteria. This information will provide the guidelines required for candidates seeking the office of U.S. Senate for the state of Nevada, to participate in the scheduled October 4th debate. The supporting documentation will need to be submitted to KLAS News Director, Terri Foley, at TFoley@LasVegasNow.com 4 weeks prior to the finalized date. KLAS will review the data submitted with a final review completed 1 week prior to the scheduled debate, whereas final invitations to qualified candidates will be issued. Should October 4th remain as our finalized date, the submission to KLAS would be due by 5:00 p.m. PST on September 6, 2018 with a final review on September 27th. If this date changes, we will provide the new timeline.

The race for U.S. Senate representing the state of Nevada is continuing to gain national attention. KLAS is fully committed to producing a respectful, quality debate that will allow each of the qualified candidates to present their stance and plans for the future of Nevada.

If you should have any questions, please feel free to reach out to me at lhowfield@lasvegasnow.com.

) or by e-mail:

Sincerely,

Lisa Howfield
Vice President & General Manager, KLAS TV 8

Lhowfield@lasvegasnow.com

(Enclosure)

EXHIBIT A

Nexstar Media Group Debate Criteria

July 2018

Nexstar Broadcasting Inc. is committed to hosting fair and open debates among qualified candidates as part of the Company's mission to inform the public and assist voters in making important electoral decisions. To determine who is a qualified candidate, the Company has adopted the following objective and non-discriminatory criteria to govern which candidates are eligible to participate in Company-sponsored debates. In order to be eligible to participate, a candidate must comply with *all* sections of this policy.

1. A candidate must be legally qualified and (x) listed on the ballot for the office the candidate is seeking or (y) be a write-in candidate who meets all of the legal qualifications required by the federal, state or municipal government for the office being sought and has filed the appropriate papers for write-in status.
2. A candidate must have publicly announced his or her candidacy in a public forum. For the purposes of this section, "public forum" includes an announcement of candidacy on the Internet.
3. A candidate must be actively campaigning for election in the jurisdiction he or she is seeking to represent for the office he or she is seeking. To meet the definition of an active campaign, a candidate must have all of the following:
 - ✓ a. A campaign headquarters with a paid and/or volunteer staff that is open to the public during business hours. For the purposes of this subsection, a campaign headquarters may not be a private residence, but may be a business address used primarily for non-campaign purposes; and
 - ✓ b. A campaign phone line; and
 - ✓ c. A publicized, dedicated candidate-specific website or web page; and
 - ✓ d. Planned in-district appearances or invitations to appear and/or speak at public gatherings; and
 - ✓ e. Monetary contributions and a campaign treasurer; and
 - ✓ f. Campaign literature; and
 - ✓ g. Press coverage identifying the candidate as a candidate in the current election by at least eight unique news reports in media (e.g. newspapers, TV, cable news, radio, or online news websites that are recognized by local and/or national media).
4. If a candidate meets at least five but not all of the requirements in Section 3 above (and meets the requirements in Section 5 below) and can show either:
 - a. He or she has received a minimum of 5 percent for a primary election, or 10 percent for a general election, support in an established, professionally conducted nonpartisan poll without taking the survey's margin of error into account, or
 - b. The percentage of votes cast for the candidate in a previous election within the four years immediately preceding the current election exceeds a minimum of 20 percent of votes for the same office or a comparable office,
 the candidate is eligible to participate in the debate.

5. In addition to the requirements of Sections 1-4 inclusive, a candidate for a state or federal office must have reported, on official forms filed with the appropriate election authority, accepting at least \$50,000 in monetary, as opposed to in-kind, campaign contributions, at least 25 percent of which must be raised from in-state constituents. For local offices, a candidate must have reported, on official forms filed with the appropriate election authority, having accepted at least \$15,000 in campaign contributions.
6. Nexstar Broadcasting Inc. and its affiliates, employees, agents and servants shall not guarantee to any candidate or candidate's campaign, verbally or in writing, that the candidate will be included in a debate until the requirements of this policy, and each of them, have been satisfied to the satisfaction of Nexstar Broadcasting Inc. and its affiliates.



Office of Nevada Secretary of State Barbara K. Cegavske

July 2018 Voter Registration Statistics

Active Voters by County and Party

County	Democrat	Independent American	Libertarian	Nonpartisan	Other	Republican	Total
Carson City	9,098	1,558	340	5,224	229	13,549	
Churchill	2,527	680	138	2,165	59	7,872	
Clark	429,678	42,300	9,237	225,613	9,946	303,593	1,020,367
Douglas	7,693	1,621	377	5,568	155	18,274	33,688
Elko	4,016	1,299	305	4,734	110	13,164	23,628
Esmeralda	102	53	9	76	6	343	589
Eureka	99	62	6	123	1	705	996
Humboldt	1,371	374	72	1,369	34	4,033	7,253
Lander	507	141	19	509	10	1,743	2,929
Lincoln	590	147	18	353	12	1,671	2,791
Lyon	7,859	2,316	428	6,421	242	17,615	34,881
Mineral	836	161	17	403	13	1,098	2,528
Nye	7,177	1,947	286	5,040	157	13,511	28,118
Pershing	520	115	19	450	8	1,332	2,444
Storey	722	215	45	537	15	1,580	3,114
Washoe	90,287	11,506	3,248	52,031	3,218	95,719	256,009
White Pine	1,141	261	31	772	20	2,280	4,505
Statewide	564,223	64,756	14,595	311,388	14,235	498,082	1,467,279

Pursuant to state and federal law there may be a change in the number of registered voters after a statewide general election due to required maintenance of the statewide voter registration list.

This report has been generated from Nevada's statewide voter registration database. The transmission of registration information between the counties and the statewide database does not take place in real time. As a result, the numbers reflected in this report may not represent registration number database at the precise moment a report is generated.

"**Total Voter Registration**" reflects all registered voters in the state that will be eligible to vote by the next federal primary or general election. This includes the following voter statuses: active, inactive, and P-17. Not all county databases may have voters in all voter status categories.

"Active Voters" status includes:

EXHIBIT B

EXHIBIT B

SECRETARY OF STATE



CORPORATE CHARTER

I, Barbara K. Cegavske, the duly elected and qualified Nevada Secretary of State, do hereby certify that **BARRY MICHAELS FOR U.S. SENATE 2018**, did on August 9, 2017, file in this office the original Articles of Incorporation; that said Articles of Incorporation are now on file and of record in the office of the Secretary of State of the State of Nevada, and further, that said Articles contain all the provisions required by the law of said State of Nevada.



IN WITNESS WHEREOF, I have hereunto set my hand and affixed the Great Seal of State, at my office on August 10, 2017.

Barbara K. Cegavske

Barbara K. Cegavske
Secretary of State

Certified By: Erica Ayala
Certificate Number: C20170810-0741
You may verify this certificate
online at <http://www.nvsos.gov/>

EXHIBIT C

Clark County, Nevada

Official Primary Election Results

ate Races

2. Representative in Congress, District 2 (Republican)
 out of 63 Precincts Reporting)
 Year Term] [Vote For 1]

andidate		% of Vote
BLE, SHARRON E.	REP	28.16%
BONS, DAWN	REP	24.95%
STER, RICHARD	REP	2.37%
LLER, DEAN	REP	39.33%
OMAS, GLENN	REP	5.18%

3. Representative in Congress, District 3 (Democratic)
 50 out of 550 Precincts Reporting)
 Year Term] [Vote For 1]

andidate		% of Vote
IDETICH, MARK	DEM	10.11%
FEN, TESSA M.	DEM	57.57%
CHAEELS, BARRY	DEM	15.63%
EVENIC, ANNA	DEM	12.58%
ARMAN, FREDDIE L.		4.11%

EXHIBIT D

PLEASE HELP US! [Donate»](#)

VOTE SMART

FACTS MATTER

My VOTESMART

[SIGN UP](#)[LOGIN](#)*"Experts nearly all recommend Vote Smart."*

- The New York Times



Barry Michaels

BIO

VOTES

POSITIONS

RATINGS

SPEECHES

FUNDING

Barry Michaels' Biography

[Print](#) [Track This Politician](#)[\(+\)](#) Expand All [\(-\)](#) Collapse All

Personal

Full Name:

Barry Michaels

Gender:

Male

Family:

Divorced; 2 Children: Eleza, Erikka

Birth Place:

Brooklyn, NY

Home City:

Las Vegas, NV

Religion:

Jewish

Education

Political Experience

Caucuses/Non-Legislative Committees

Professional Experience

Religious, Civic, and other Memberships

Additional Information

On The
Ballot:

Running, No Political
Party for U.S. Senate -
Sr

Contact Information

Campaign Email
barry@BarryForUSSenate.com
Campaign Webmail
<http://barryforussenate.com/contact/>
Campaign Website
<http://barryforussenate.com/>
Campaign Social Media

Campaign

108 Gillespie Street, Suite 104
Las Vegas, NV 89183
Phone: 702-523-3700

SUBMIT

EXHIBIT E

Subscribe

Donate to Ballotpedia

Share: [f](#) [t](#) [e](#)

BALLOTPEDIA

Search the Encyclopedia of American Politics



Hawke Media
Hawke Media

Visit Site

Barry Michaels

Barry Michaels is a 2018 independent candidate seeking election to the U.S. Senate from Nevada.^[1]

Michaels was a 2016 Democratic candidate who sought election to the U.S. House to represent the 3rd Congressional District of Nevada. Michaels was defeated by Jacky Rosen in the Democratic primary.^[2]

Michaels was a 2012 Democratic candidate who sought election to the U.S. House to represent the 3rd Congressional District of Nevada. He was defeated in the Democratic primary on June 12, 2012.

Biography

Michaels obtained his B.A. and M.A. from the University of Nevada, Las Vegas.^[3]

Elections

2018

See also: *United States Senate election in Nevada, 2018*

General election

Barry Michaels

Candidate, U.S. Senate Nevada

Independent

Report an officeholder change

Elections and appointments

Next election November 6, 2018

Education

Bachelor's University of Nevada, Las Vegas

Contact

Website

How will 2018 influence the direction of the Democratic and Republican parties?

Get the important Democratic or Republican Party news from Ballotpedia this primary season, including elections for U.S. Senate & House, govern

EXHIBIT F

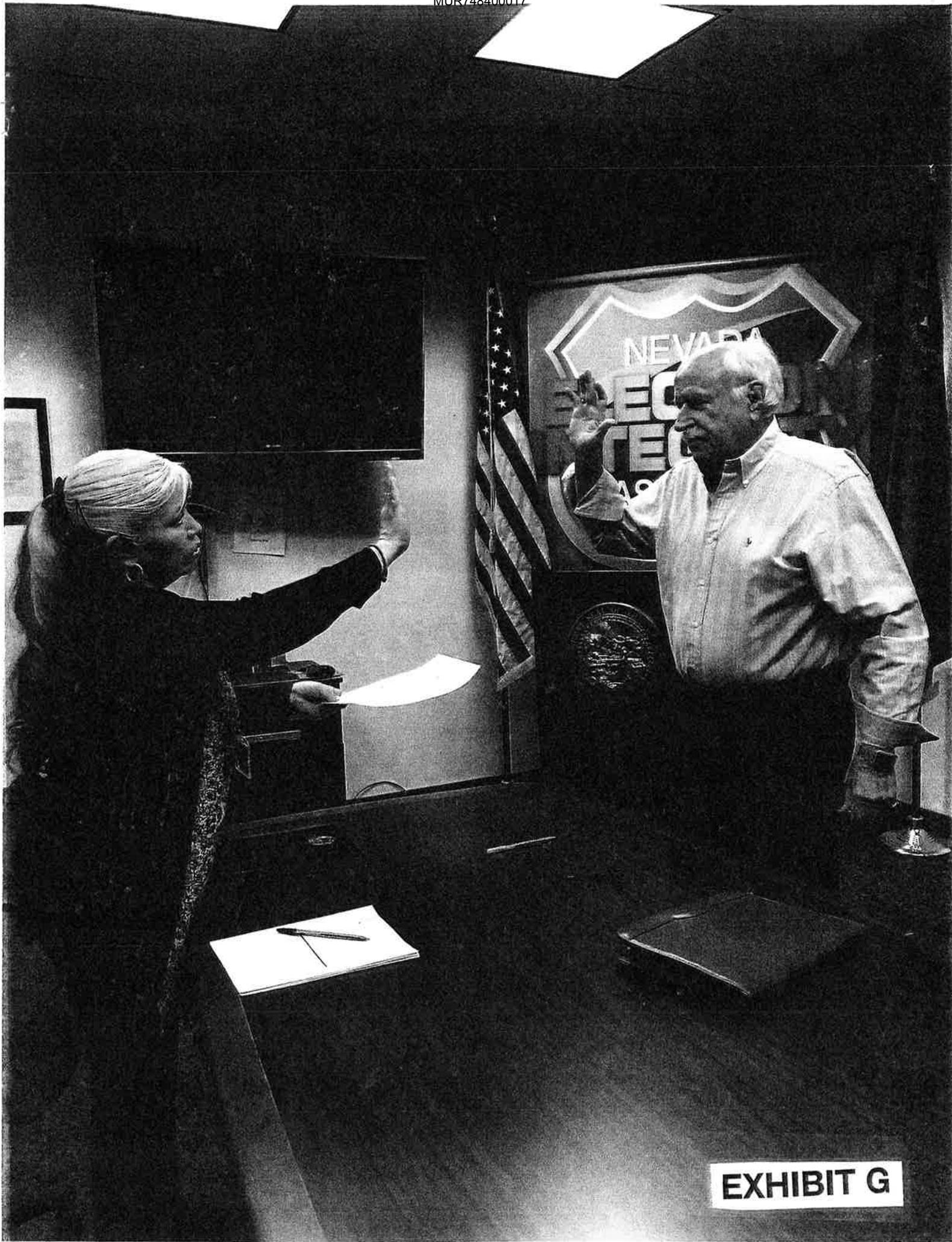


EXHIBIT G

THANK YOU

Barry Michaels

evada U.S. Senate Candidate

or signing the

U.S. Term Limits
CONGRESSIONAL

PLEDGE

U.S.

TERM

LIMITS

termlimits.org

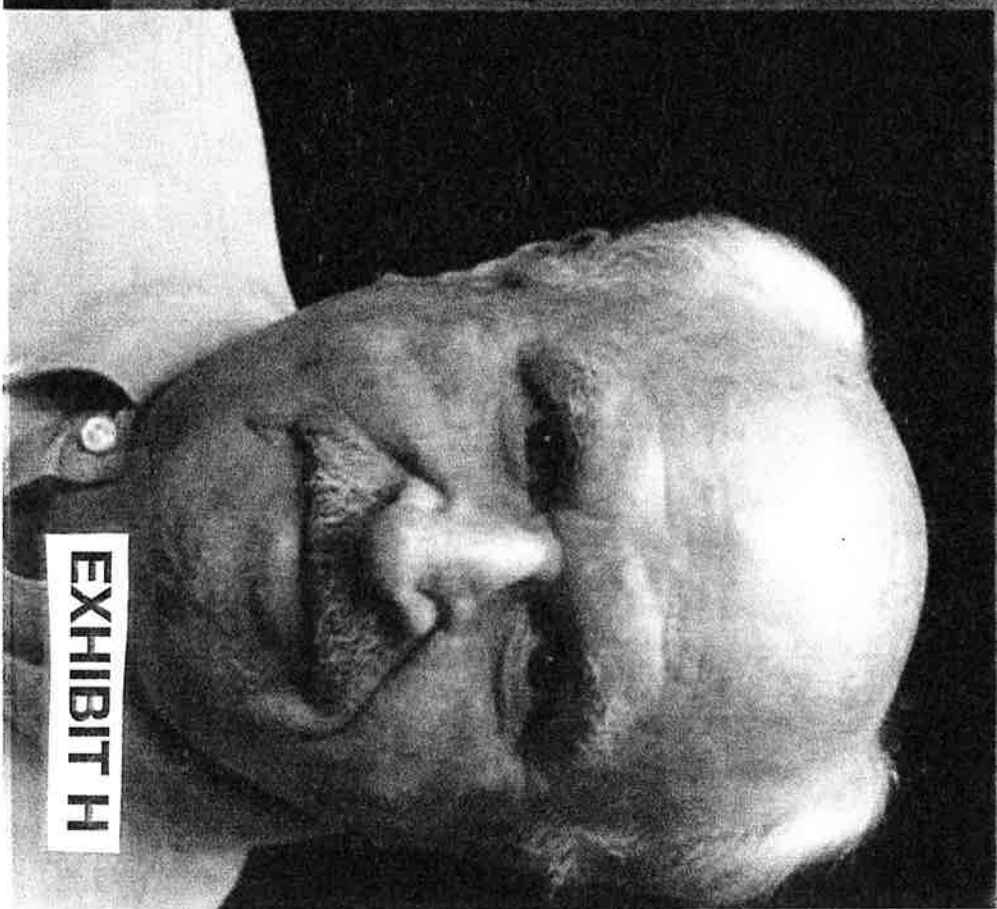


EXHIBIT H

EXHIBIT H

here were 645 press releases posted in the last 24 hours and 156,628 in the last 365

World Media Directory ·  [RSS](#) ·  [Email Newsletter](#)

ays.

Barry Michaels U.S. Senate Nevada 2018 - Challenges Federal Gun Control Act

Senate Candidate barred from protecting himself fights back

LAS VEGAS, NEVADA, UNITED STATES, August 9, 2017

NPresswire.com/ -- [Barry Michaels](#) is running for U.S. Senate in Nevada but is unable to possess a firearm in his home for self-defense because he's a felon and federal law prohibits all felons from possessing a firearm, even those with non-violent convictions.

Michaels decided to challenge the law in federal court and on July 27th his attorney [Michael E. Zapin](#) filed their [Opening Brief](#) with the 9th Circuit Court of Appeals. He alleges a provision of the Federal Gun Control Act applied to him and millions of other similarly situated law-abiding citizens, violate their constitutional right under the Second Amendment, "the right of all people to keep and bear arms, shall not be infringed."

Michaels alleges that the statute's original purpose was to protect the public from violent offenders. He believes that the statute is too broad as written and should have been narrowly



Barry Michaels



Michael E Zapin

Contact

Barry Michaels or Michael E. Zapin
Barry Michaels for U.S. Senate 2018
702.415.0905 or 561.843.5352
[email us here](#)

Share This Story

 [Facebook](#)

 [Twitter](#)

 [LinkedIn](#)

 [Google+](#)

 [Print](#)

 [PDF](#)

More From This Source

[U.S. Senate Candidate Proposes \\$25,000 Income Tax Credit for Teachers](#)

[Dean Heller Challenged By Local Businessman For Senate Seat](#)

[Guns For Felons - U.S. Senate Candidate Challenges Gun Control Act](#)

[View All Stories From This Source](#)

EXHIBIT I



This is article draft.

Dean Heller Challenged By Local Businessman For Senate Seat

Nevada Has a 3rd and Better Choice For U.S. Senate in 2018

LAS VEGAS, NEVADA, CLARK, October 11, 2017 /EINPresswire.com/ -- Under ordinary circumstances Barry Michaels would be considered a well qualified candidate given his fifty plus years of business experience and multiple graduate degrees. Add to this, his knowledge of International Relations, Middle East and Latin American politics, International Terrorism, Law and the U.S. Constitution.

The problem for Barry, he is a convicted felon who in 1997 plead guilt to securities fraud and was sentenced to 21 months. After completing his sentence in 1999 Barry returned to school where he graduated from the University of Nevada, Las Vegas, with a Bachelor's in Political Science and a Master's in Public Administration and continues to be active in several businesses along with public charities.



Although Barry has never held public office, he is not new to the Las Vegas political scene having run several times for Nevada's 3rd congressional district. It was during this time Barry learned it was the party's, not the candidates who controlled elections. So, like many other Americans, Barry is fed up with our two party system and has chosen to run as a non-partisan Independent Candidate free from all party influence.

“

I believe political party's are destroying our great nation. I urge you to vote for the "BEST CANDIDATE", rather than the political party"

Barry Michaels

Most people who know Barry think of him as a visionary who spent much of his career creating new ideas and businesses. Since entering the political arena Barry

unique plans which will create new jobs, fund small businesses, forgiving student health insurance for everyone all revenue neutral.

EXHIBIT J



Mat

SilverFlume

Saturday i...

(41) Lloye...

Attendees...

Buffalo Wil...

36°06'55....

U.S. Se...

EIN PRESSWIRE

Questions? +1 800-883-2055

LOGIN

Set Up FREE Account

Submit Release

Why Us

Press Releases

Services

Pricing & Comparison Chart

Distribution

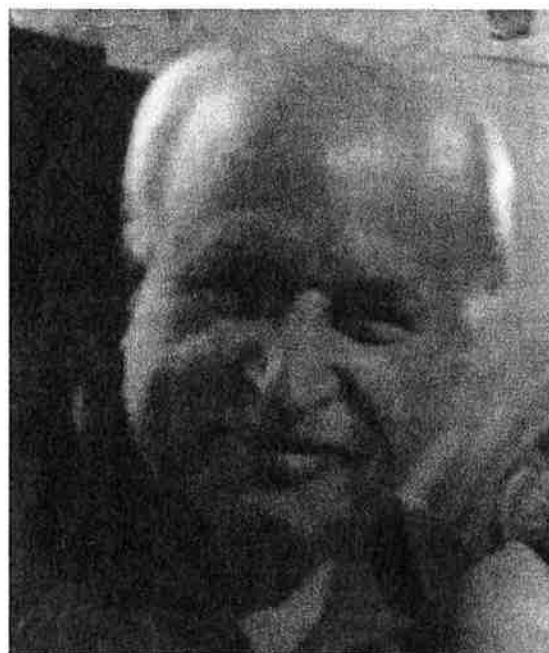
Contact

here were 18 press releases posted in the last 24 hours and 155,940 in the last 365 days. [World Media Directory](#) · [RSS](#) · [Email Newsletter](#)

U.S. Senate Candidate Proposes \$25,000 Income Tax Credit for Teachers

Helping to promote education by recognizing our teachers and the role they play in the lives of our children

LAS VEGAS, NEVADA, ARK, June 20, 2018 [EinPresswire.com](#)/ -- Barry Michaels, a well known Las Vegas businessman, is running for the U.S. Senate in Nevada and is passionate about education. Barry believes everything begins with education whether it's in the home, or the classroom.



Contact

Barry Michaels

Barry Michaels For U.S. Senate 2018

7024150905

[email us here](#)

Share This Story

[Facebook](#)[Twitter](#)[LinkedIn](#)[Google+](#)[Print](#)[PDF](#)

When elected, Barry's first plan of action will be to introduce a new legislative bill he calls: "The National Teachers Tax Relief Act of 2019". This legislation will provide every K-12 public school teacher with a \$25,000 a year federal income tax credit. Since most teachers are grossly underpaid, this tax credit will help retain our current public school teachers as well as attract new ones to this notoriously underpaid profession.



More From This Source

[U.S. Senate Candidate Proposes \\$25,000 Income Tax Credit for Teachers](#)[Dean Heller Challenged By Local Businessman For Senate Seat](#)[Guns For Felons - U.S. Senate Candidate Challenges Gun Control Act](#)[View All Sources From This Source](#)**EXHIBIT K**

Charlotte's Web CBD Extract

HEMP



COMPLETE ELECTION COVERAGE MIDTERMS 2018

[Home](#)[Calendar](#)[Polls](#)

HOME \ ELECTIONS \ NEVADA \ BARRY MICHAELS



Nevada

Barry Michaels

Barry Michaels was a 2016 Democratic candidate who sought election to the U.S. House to represent the 3rd Congressional District of Nevada. Michaels was defeated by Jacky Rosen in the Democratic primary. Michaels was a 2012 Democratic candidate who sought election to the U.S. House to represent the 3rd Congressional District of Nevada. He was defeated in the Democratic primary on June 12, 2012.

Upcoming Race

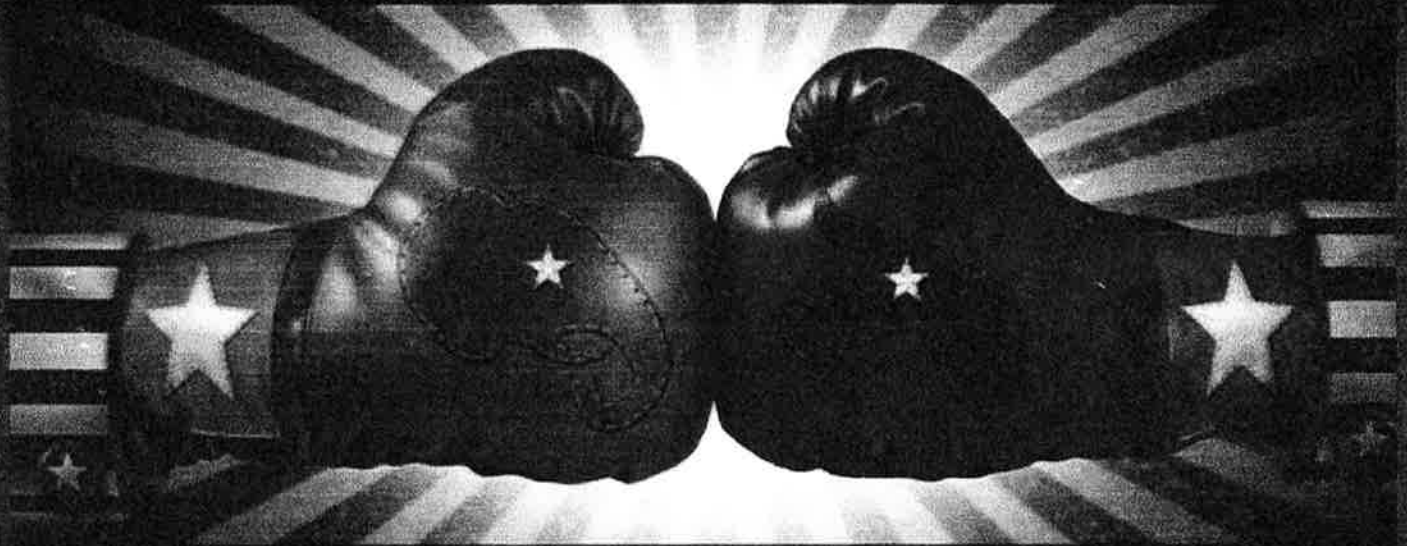
- **Office:** U.S. Senate Nevada
- **Number of Seats Up for Election:** 1
- **Year:** 2018
- **District Name:** Nevada
- **District Type:** State
- **Office Level:** Federal
- **Office Branch:** Legislative
- **Office Chamber:** Upper

EXHIBIT L 

Primary Election Information

A Better Choice For Nevada

Barry Michaels



United States Senate — 2018

www.BarryForUSSenate.com

Sign in with  **QUICK
CONTRIBUTE**

Once

Monthly

Choose Amount*

\$1

\$5

\$10

\$25

\$50

\$100

\$250

\$500

\$1,000

\$2,600

Other

EXHIBIT M



EXHIBIT N

[Edit profile](#)

Barry Michaels For U.S. Senate - 2018

@Barry4USSenate

Independent Candidate for the U.S. Senate with knowledge, experience, common sense and vision to make Nevada and the nation a better place.

📍 Las Vegas, Nevada, USA 🌐 BarryforUSSenate.com

📅 Joined July 2017

36K Following 14.9K Followers

Tweets

Tweets & replies

Media

Likes



Barry Michaels For U.S. Senate - 2018 @Barry4USSe... · 1h

Is Jacky Rosen and Dean Heller afraid to have me in their debate? Voters should have a choice other than the two party puppets. #jackyrosen #deanheller #democrats #republicans @ Reno,... [instagram.com/p/BI8MpdYn3xx/...](https://www.instagram.com/p/BI8MpdYn3xx/)





EXHIBIT P

Call

Email

Directions

Nevada

9708 Gillespie St, Suite 104, Las Vegas,

BarryforUSSenate.com/

better choice for Nevada and the Country.

United States Senate Candidate - 2018 - a

Business

Barry Michaels

Edit Profile

Promote



366 9,590 7,454

25

barryforussenate2... 9+ 3

Page

Activity 20+

Insights

Barry Michaels For U.S. Senate

Independent Candidate



Barry Michaels For U.S. Senate 2018

@independentcandidateforU.S.Senate

Send Message



Publish



Photo



Promote



Edit Page

Public Figure • Las Vegas, Nevada

Home

About

Videos

Posts

Events

Photos

Community

Instagram

16% response rate, day or more to respond

Respond faster to turn on the badge



Reach people nearby for \$10

Promote your business in Las Vegas



Send Message

2 clicks over the past 7 days



Invite Friends to Like this Page

Invite friends to like Barry Michaels For U.S. Senate 2018 to attract new visitors to your audience.

EXHIBIT Q





★★★★☆

GET — On the App Store

VIEW

EXHIBIT R

Real
Pre





Home



My Network



Jobs



Messaging



Notifications



Me



Work

Need Funds To Grow? - Get up to \$100,000 Fundbox Credit to grow your business. Apply now. Ad

9,859

Your connections

See all



Add personal contacts

We'll store your contacts to help you and others connect. You choose who to connect to and who to invite. [Learn more](#)

nevadaonly@yahoo.com

Continue

More options

Invitations (1)

Manage all



anthony james Goulding accepted your invitation to connect

[See all](#)



Susan McAdam

Telecom Consultant

👤 Lisa Thomas and 17 others

Ignore

Accept

People you may know



BCO at LANDSTAR EXPRESS AMERICA

👤 Scott R Jarman and 43 others

Connect



Founder at Las Vegas Black Film Festival

👤 Anna Zakowska, MBA, LLM and 46 others

Connect



Owner at Riptide Home Services LLC

👤 Scott R Jarman and 32 others

Connect

Promoted



Going to G
Visit BenQ t
Google Jam
Next!



Manage Ou
Investment I
Made Just f
Free Demo



Unsecured
In Business
Unsecured I
24 Hours

About

Help Center

Advertising

Get the Link

LinkedIn

