

OFFICE OF  
GENERAL COUNSEL

## FEDERAL ELECTION COMMISSION

2020 JAN 21 PM 1:10

In the matter of:

MUR#

7682

AMY MCGRATH FOR SENATE, INC. by  
and through its treasurer Chris Patton, and  
MARK NICKOLAS,

*Respondents.*

**COMPLAINT**

1. J. McCauley Brown, chair of the Republican Party of Kentucky, brings this complaint pursuant to 52 U.S.C. § 30109(a)(1) seeking an immediate investigation and enforcement action against Amy McGrath For Senate, by and through its treasurer, and Mark Nickolas ("Respondents"), for direct, willful, and serious violations of the Federal Election Campaign Act of 1971, as amended ("FECA"), and Federal Election Commission (the "FEC" or "Commission") regulations.
2. FECA prohibits candidates for federal office and their agents from soliciting funds that are not subject to its limitations, prohibition, and reporting requirements. This prohibition on soliciting so-called "soft money" contributions is designed to prevent candidates from circumventing FECA's anti-corruption purposes.
3. This complaint details blatant violations of this prohibition by the campaign manager for Amy McGrath, a candidate for federal office.
4. As outlined below, McGrath's campaign manager, Mark Nickolas, knowingly and willfully solicited illegal soft money contributions for a pro-McGrath super PAC. In his words, "people who are interested in contributing beyond the legal limits ... should have confidence to contribute to the Super PAC."

## **RESPONDENTS**

5. Amy McGrath For Senate, Inc. (the “McGrath Campaign”) is a federal principal campaign committee formed under FECA on July 9, 2019, and authorized by Amy McGrath, candidate for United States Senate from Kentucky.
6. Chris Patton is the treasurer of the McGrath Campaign.
7. Mark Nickolas serves as campaign manager for the McGrath Campaign.

## **FACTUAL BACKGROUND**

### ***Fire Mitch Save America Was Formed As A Super PAC***

8. On December 24, 2019, Save America Fund filed FEC Form 1, Statement of Organization, with the FEC (enclosed as Exhibit 1). In its Form 1, Save America Fund noticed its intent to “make independent expenditures” and “to raise funds in unlimited amounts.” It further assured the Commission it “will not use those funds to make contributions, whether direct, in-kind, or via coordinated communications, to federal candidates or committees.”
9. On January 6, 2020, Save America Fund filed an amended FEC Form 1 listing its web page address as [www.firemitschsaveamerica.com](http://www.firemitschsaveamerica.com) (enclosed as Exhibit 2).
10. On January 7, 2020, press reports emerged about the formation of a new pro-McGrath super PAC, “Fire Mitch Save America” (“FMSA”).<sup>1</sup> On that same day, the Twitter handle “Fire Mitch Save America” posted its inaugural tweet announcing its launch.<sup>2</sup>

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<sup>1</sup> See, e.g., Daniel Desrochers, *Former Andy Beshear Staffer Forms Super PAC To Raise Money For Amy McGrath*, MCCLATCHY (Jan. 7, 2020), <https://www.mcclatchydc.com/news/politics-government/election/article239012218.html>.

<sup>2</sup> See Fire Mitch Save America (@fire\_mitch), TWITTER (Jan. 7, 2020, 09:02 AM) (inaugural tweet), [https://twitter.com/fire\\_mitch/status/1214547802686132226](https://twitter.com/fire_mitch/status/1214547802686132226); Fire Mitch Save America (@fire\_mitch), TWITTER (Jan. 7, 2020, 09:30 AM) (“We are Fire Mitch Save America. We want to see Mitch McConnell

11. The web page [www.firemitschsaveamerica.com](http://www.firemitschsaveamerica.com) includes a disclaimer which shows that the group is, in fact, Save America Fund.<sup>3</sup>

***McGrath's Campaign Manager Solicits Illegal Soft Money Contributions For The Pro-McGrath Super PAC***

12. Contemporaneous with the launch of FMSA, Mark Nickolas—in his capacity as McGrath's campaign manager—signaled to potential donors that FMSA had the support of the McGrath campaign.
13. As Nickolas explained about the formation of the new super PAC, “the signal is for **people who are interested in contributing beyond the legal limits, they should have confidence to contribute to the Super PAC.**”<sup>4</sup> This statement appeared on the McClatchy website, and locally in the Herald Leader in Lexington, Kentucky. The article identified Nickolas as Amy McGrath's campaign manager. Thus, he was speaking as her agent.
14. The new super PAC was also reported in Politico, which included an additional quote from Nickolas: “**We very strongly encourage donors to give to [Fire Mitch, Save America].**”<sup>5</sup> Again, Nickolas was identified as McGrath's campaign manager. Therefore, again he was speaking as her agent.
15. Nickolas' statements, in turn, have been used by FMSA as part of its own solicitations.

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lose, we want to see Amy McGrath win and we've got the roadmap to do it.”), [https://twitter.com/fire\\_mitch/status/1214555024744951808](https://twitter.com/fire_mitch/status/1214555024744951808).

<sup>3</sup> See <http://www.firemitschsaveamerica.com> (last accessed Jan. 9, 2020).

<sup>4</sup> Daniel Desrochers, *Former Andy Beshear Staffer Forms Super PAC To Raise Money For Amy McGrath*, MCCLATCHY (Jan. 7, 2020) (emphasis added), <https://www.mcclatchydc.com/news/politics-government/election/article239012218.html>; Daniel Desrochers, *Former Andy Beshear Staffer Forms Super PAC To Raise Money For Amy McGrath*, HERALD LEADER (Jan. 7, 2020) (emphasis added), <https://www.kentucky.com/news/politics-government/article239012218.html>.

<sup>5</sup> Zach Montellaro, *Morning Score*, POLITICO (Jan. 7, 2020) (emphasis added), <https://www.politico.com/newsletters/morning-score/2020/01/07/the-democratic-debate-squeeze-784121>.

16. For example, featured prominently on the ActBlue donation page tweeted out by the FMSA Twitter account upon its launch was Nickolas' full quote in Politico, which reads:

This is a big deal that Eric [Hyers] will lead this effort, given his recent success in ousting the other unpopular Republican in Kentucky in a race that many didn't think was winnable. He knows this electorate better than anyone. We very strongly encourage donors to give to [Fire Mitch, Save America].<sup>6</sup>

17. This quote was also included on the ActBlue donation page promoted on Twitter by Eric Hyers, FMSA's founder.<sup>7</sup>
18. These ActBlue donation pages allow donations of any size, and are not limited to funds that are subject to the limitations, prohibitions, and reporting requirements of FECA.

***McGrath's Campaign Manager Has Extensive Campaign History Evidencing The Willfulness Of His Solicitation***

19. Mark Nickolas has extensive campaign experience at the federal level dating back to 1996.<sup>8</sup>
20. This work includes serving as an intern in the White House Office of Political Affairs during the Clinton administration and as an aide to Vice President Gore for several years leading up to the 2000 presidential campaign.<sup>9</sup>

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<sup>6</sup> See Fire Mitch Save America (@fire\_mitch), TWITTER (Jan. 8, 2020, 12:20 PM) (including link to ActBlue donation page with reference code "retweet" attached as Exhibit 3), [https://twitter.com/fire\\_mitch/status/1214960192644952064](https://twitter.com/fire_mitch/status/1214960192644952064).

<sup>7</sup> See Eric Hyers (@EricHyers), TWITTER (Jan. 7, 2020, 12:17 PM) (including link to ActBlue donation page with reference code "fir\_or\_tw\_eh" attached as Exhibit 4), <https://twitter.com/EricHyers/status/1214596998424399876>.

<sup>8</sup> See Mark Nickolas' Bio, THE RECOVERING POLITICIAN (last accessed Jan. 9, 2020), <http://therecoveringpolitician.com/mark-nickolas-bio>.

<sup>9</sup> *Id.*

21. Nickolas also worked on the 2000 Gore presidential campaign, and was “one of the original political staff during the Florida recount.”<sup>10</sup>
22. Additional federal campaign work includes serving as deputy campaign manager for U.S. Senator Tim Johnson’s (D-SD) 2002 reelection campaign, and as campaign manager for Ben Chandler’s (D-KY06) 2004 special congressional election campaign as well as his 2004 general election campaign later that year.<sup>11</sup>
23. Nickolas also served as campaign manager to McGrath’s failed 2018 congressional campaign.<sup>12</sup>
24. In addition to his federal campaign work, Nickolas has served as a political blogger, and as a contributor for the Huffington Post.<sup>13</sup>
25. Nickolas has previously faced charges of ignoring the law, having been indicted in 2007 on charges of willfully failing to file any state income tax returns for 2004, 2005, or 2006.<sup>14</sup>

### COUNT I

#### ***McGrath’s Campaign Manager Solicited Soft Money Contributions Outside The Limitations, Prohibitions, And Reporting Requirements Of FECA***

26. FECA prohibits federal candidates *and their agents* from soliciting funds “in connection with an election for Federal office, including funds for any Federal

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<sup>10</sup> *Id.*

<sup>11</sup> *Id.*

<sup>12</sup> See Ronnie Ellis, *McGrath Can’t Be Labeled*, RICHMOND REGISTER (May 25, 2018), [https://www.richmondregister.com/news/mcgrath-can-t-be-labeled/article\\_ab2cdd9a-606f-11e8-b45f-cb8aed507a87.html](https://www.richmondregister.com/news/mcgrath-can-t-be-labeled/article_ab2cdd9a-606f-11e8-b45f-cb8aed507a87.html).

<sup>13</sup> Contributor Mark Nickolas, HUFFINGTON POST (last accessed Jan. 9, 2020), <https://www.huffpost.com/author/mark-nickolas>.

<sup>14</sup> *Democratic Blogger Indicted On State Income Tax Charge*, WAVE3 NEWS (Jan. 17, 2007), <https://www.wave3.com/story/5951391/democratic-blogger-indicted-on-state-income-tax-charge>.

election activity, unless the funds are subject to the limitations, prohibitions, and reporting requirements of [FECA].”<sup>15</sup>

27. Given this prohibition, federal candidates and their agents may only solicit contributions for a super PAC up to \$5,000 from federal political committees and individuals who are not prohibited sources.<sup>16</sup>

***Mark Nickolas Is An Agent Of Amy McGrath***

28. FEC regulations define an agent as “any person who has actual authority, either express or implied, to ... in the case of an individual who is a Federal candidate ... solicit, receive, direct, transfer, or spend funds in connection with any election.”<sup>17</sup>

29. Under this definition, Mark Nickolas, in his role as campaign manager, is an agent of Amy McGrath.<sup>18</sup>

30. For each solicitation made by Nickolas, he was identified as McGrath’s campaign manager and, therefore, was acting as her agent when making the solicitations.

***McGrath’s Agent Solicited Funds In Excess Of FECA’s Contribution Limits***

31. FEC regulations define a solicitation as “an oral or written communication that, construed as reasonably understood in the context in which it is made, contains a clear message asking, requesting, or recommending that another person make a contribution, donation, transfer of funds, or otherwise provide anything of value.”<sup>19</sup>

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<sup>15</sup> 52 U.S.C. § 30125(e)(1)(A); *see also* 11 C.F.R. §§ 300.60 and 300.61.

<sup>16</sup> *See* Advisory Opinion 2011-12 (Majority PAC *et al.*) at 3; 52 U.S.C. § 30116(a)(1)(C).

<sup>17</sup> 11 C.F.R. § 300.2(b)(3).

<sup>18</sup> *See* Revised Explanation and Justification, Definitions of “Agent” for BCRA Regulations on Non-Federal Funds or Soft Money and Coordinated and Independent Expenditures, 71 Fed. Reg. 4975, 4977-4978 (Jan. 31, 2006) (“[T]he Commission’s soft money regulations define ‘agents’ as individuals with actual authority to solicit or receive funds ... A title or position is most frequently part of the grant of actual authority, either express or implied, to act on behalf of a principal. The scope of the authority created will depend on the title given and the understanding of the agent and the principal.”).

<sup>19</sup> 11 C.F.R. § 300.2(m).

32. Solicitations can be made directly or indirectly.<sup>20</sup>

33. Examples of statements that constitute solicitations include: “You have reached the limit of what you may contribute directly to my campaign, but you can further help my campaign by assisting the State party;” “Please give \$100,000 to Group X;” “Send all contributions to the following address;” and “I am not permitted to ask for contributions, but unsolicited contributions will be accepted at the following address \* \* \*.”<sup>21</sup>

34. Nickolas, in his role as campaign manager, made clear, direct, and unambiguous solicitations for contributions to FMSA. These solicitations were not limited to federal funds:

- a. “[F]or people who are interested in contributing beyond the legal limits, they should have confidence to contribute to the Super PAC.”
- b. “We very strongly encourage donors to give to [Fire Mitch, Save America].”

35. These solicitations were clearly made on behalf of the campaign and Amy McGrath, and were made in Nickolas’ role as an agent of the McGrath Campaign (e.g., “We very strongly encourage ...”).

36. Nickolas’ solicitations, on behalf of the McGrath Campaign, were not limited to funds subject to the limitations, prohibitions, and reporting requirements of FECA. Rather, Nickolas expressly asks donors to give funds “beyond the legal limits.”

37. At least two of FMSA’s ActBlue donation pages included Nickolas’ solicitation language. Further, the donation pages included no indication that the solicitation

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<sup>20</sup> *Id.*

<sup>21</sup> *Id.* at (2).

was limited to funds that are subject to the limitations, prohibitions, and reporting requirements of FECA.<sup>22</sup>

38. Unlike MUR 6939, Nickolas' solicitations were not made in jest, or otherwise intended as anything other than what they explicitly stated—a request for contributions above the legal limits.<sup>23</sup> Nickolas directly referenced a super PAC that may receive unlimited contributions, and requested that donors give funds “beyond the legal limits” to this super PAC. That the super PAC subsequently used Nickolas' statements on its donation pages to “legitimize” itself with McGrath supporters merely reinforces the obvious fact that Nickolas was soliciting soft money for the super PAC.

39. On these facts, Nickolas acted as an agent for Amy McGrath, a candidate for federal office, when he unambiguously solicited funds “in excess of the legal limits” for a super PAC. This is a direct violation of FECA and FEC regulations.

40. Given Nickolas' extensive prior federal campaign experience, his solicitations may be regarded as knowing and willful violations. Nickolas clearly intended to bestow the McGrath campaign's approval on FMSA and to encourage donations to FMSA. In doing so, he unlawfully, and flagrantly, solicited funds “in excess of the legal limits.”

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<sup>22</sup> See MUR 7135 (Donald J. Trump for President, Inc., *et al.*), First General Counsel's Report at 9 (April 20, 2017).

<sup>23</sup> Cf. MUR 6939 (Mike Huckabee, *et al.*), First General Counsel's Report at 6 (Sep. 22, 2015) (finding that the candidate “appeared to be making a humorous aside in the course of his speech ... and many in the audience laughed.”); MUR 7135 (Donald J. Trump for President, Inc., *et al.*), First General Counsel's Report at 6-7 (April 20, 2017) (citing MUR 6939 and finding “[a] reasonable person could also have understood that [the individual] was joking since he smiled and chuckled while making the statement, and one or more of the hosts laughed in response.”).




### CONCLUSION

WHEREFORE, Respondents' failure to comply with FECA and appropriate FEC regulations warrants investigation by the Commission.

THEREFORE, Complainant respectfully requests that the Commission provide the following relief:

1. Find reason to believe that Respondents violated FECA and applicable FEC regulations;
2. Conduct an investigation into the serious allegations raised against Respondents;
3. Order Respondents to correct these violations;
4. Impose appropriate sanctions, including civil penalties;
5. If necessary, bring action in federal court to remedy the violations set forth herein;  
and
6. Take all other necessary and appropriate action, including referring this matter to the Department of Justice for criminal prosecution.

  
\_\_\_\_\_  
J. McCauley Brown, Chairman  
Republican Party of Kentucky  
PO Box 1068  
Frankfort, KY 40602

**VERIFICATION**

J. McCauley Brown hereby verifies that the statements made in the foregoing complaint are, upon information and belief, true as presented. Sworn pursuant to 11 C.F.R. § 111.4 and 18 U.S.C. § 1001.

  
J. McCauley Brown  
Chairman, Republican Party of Kentucky

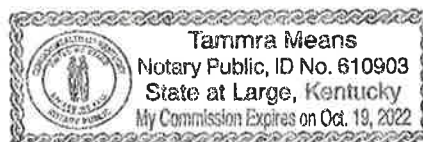
COMMONWEALTH OF KENTUCKY

SWORN TO AND SUBSCRIBED before me on this 14<sup>th</sup> day of January, 2020.

  
Notary Public

My commission expires:

10-19-22



# Exhibit 1

**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

Save America Fund

ADDRESS (number and street)

One Park Row

- ☐ (Check if address is changed)

5th Floor

Providence

CITY ▲

RI

STATE ▲

02903

ZIP CODE ▲

COMMITTEE'S E-MAIL ADDRESS

- ☐ (Check if address is changed)

fec@cfoconsults.com

Optional Second E-Mail Address

COMMITTEE'S WEB PAGE ADDRESS (URL)

- ☐ (Check if address is changed)

2. DATE

M M / D D / Y Y Y Y  
12 24 / 2019

3. FEC IDENTIFICATION NUMBER ►

C C00732172

4. IS THIS STATEMENT ☒ NEW (N) OR ☐ AMENDED (A)

I certify that I have examined this Statement and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer Galvin, Edward, , ,

Signature of Treasurer Galvin, Edward, , ,

[Electronically Filed]

Date

M M / D D / Y Y Y Y  
12 24 / 2019

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. §437g.  
ANY CHANGE IN INFORMATION SHOULD BE REPORTED WITHIN 10 DAYS.

Office  
Use  
Only

For further information contact:  
Federal Election Commission  
Toll Free 800-424-9530  
Local 202-694-1100

**FEC FORM 1**  
(Revised 06/2012)

## 5. TYPE OF COMMITTEE

**Candidate Committee:**

- (a) ☐ This committee is a principal campaign committee. (Complete the candidate information below.)
- (b) ☐ This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)

Name of  
CandidateCandidate  
Party AffiliationOffice  
Sought:

House

Senate

President

State

District

- (c) ☐ This committee supports/opposes only one candidate, and is NOT an authorized committee.

Name of  
Candidate**Party Committee:**

- (d) ☐ This committee is a (National, State or subordinate) committee of the (Democratic, Republican, etc.) Party.

**Political Action Committee (PAC):**

- (e) ☐ This committee is a separate segregated fund. (Identify connected organization on line 6.) Its connected organization is a:
- ☐ Corporation ☐ Corporation w/o Capital Stock ☐ Labor Organization
- ☐ Membership Organization ☐ Trade Association ☐ Cooperative
- ☐ In addition, this committee is a Lobbyist/Registrant PAC.
- (f) ☒ This committee supports/opposes more than one Federal candidate, and is NOT a separate segregated fund or party committee. (i.e., nonconnected committee)
- ☐ In addition, this committee is a Lobbyist/Registrant PAC.
- ☐ In addition, this committee is a Leadership PAC. (Identify sponsor on line 6.)

**Joint Fundraising Representative:**

- (g) ☐ This committee collects contributions, pays fundraising expenses and disburses net proceeds for two or more political committees/organizations, at least one of which is an authorized committee of a federal candidate.
- (h) ☐ This committee collects contributions, pays fundraising expenses and disburses net proceeds for two or more political committees/organizations, none of which is an authorized committee of a federal candidate.

**Committees Participating in Joint Fundraiser**

- |    |                      |               |                      |
|----|----------------------|---------------|----------------------|
| 1. | <input type="text"/> | FEC ID number | <input type="text"/> |
| 2. | <input type="text"/> | FEC ID number | <input type="text"/> |
| 3. | <input type="text"/> | FEC ID number | <input type="text"/> |
| 4. | <input type="text"/> | FEC ID number | <input type="text"/> |

Write or Type Committee Name

**Save America Fund****6. Name of Any Connected Organization, Affiliated Committee, Joint Fundraising Representative, or Leadership PAC Sponsor**

NONE

Mailing Address

CITY

STATE

ZIP CODE

Relationship:

☐

Connected Organization

☐

Affiliated Committee

☐

Joint Fundraising Representative

☐

Leadership PAC Sponsor

**7. Custodian of Records:** Identify by name, address (phone number -- optional) and position of the person in possession of committee books and records.

Full Name

Galvin, Edward, , ,

Mailing Address

One Park Row

5th Floor

Providence

RI

02903

Title or Position

CITY

STATE

ZIP CODE

Treasurer

Telephone number

401

454

0990

**8. Treasurer:** List the name and address (phone number -- optional) of the treasurer of the committee; and the name and address of any designated agent (e.g., assistant treasurer).Full Name  
of Treasurer

Galvin, Edward, , ,

Mailing Address

One Park Row

5th Floor

Providence

RI

02903

Title or Position  
Treasurer

CITY

STATE

ZIP CODE

Telephone number

401

454

0990

Full Name of  
Designated  
Agent

Mailing Address

Title or Position

Telephone number

9. **Banks or Other Depositories:** List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of Bank, Depository, etc.

Bank of America

Mailing Address

100 Westminster St

Ste 1050

Providence

RI

02903

CITY

STATE

ZIP CODE

Name of Bank, Depository, etc.

Mailing Address

CITY

STATE

ZIP CODE

**FEC MISCELLANEOUS TEXT RELATED TO A REPORT, SCHEDULE OR ITEMIZATION****Form/Schedule: F1N****Transaction ID :**

This committee intends to make independent expenditures, and consistent with the U.S. Court of Appeals for the District of Columbia Circuit decision in *SpeechNow v. FEC*, it therefore intends to raise funds in unlimited amounts. This committee will not use those funds to make contributions, whether direct, in-kind, or via coordinated communications, to federal candidates or committees.

**Form/Schedule:****Transaction ID:**



# Exhibit 2

FEC  
FORM 1STATEMENT OF  
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Office Use Only

1. NAME OF COMMITTEE (in full) ☐ (Check if name is changed) Example: If typing, type over the lines.

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- ☐ (Check if address is changed)

5th Floor

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CITY ▲

RI

STATE ▲

02903

ZIP CODE ▲

COMMITTEE'S E-MAIL ADDRESS

- ☐ (Check if address is changed)

fec@cfoconsults.com

Optional Second E-Mail Address

COMMITTEE'S WEB PAGE ADDRESS (URL)

- ☒ (Check if address is changed)

www.firemitchsaveamerica.com

2. DATE

M	M	/	D	D	/	Y	Y	Y	Y
0	1	/	0	6	/	2	0	2	0

3. FEC IDENTIFICATION NUMBER ►

C C00732172

4. IS THIS STATEMENT ☐ NEW (N) OR ☒ AMENDED (A)

I certify that I have examined this Statement and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer Galvin, Edward, , ,

Signature of Treasurer

Galvin, Edward, , ,

[Electronically Filed]

Date

M	M	/	D	D	/	Y	Y	Y	Y
0	1	/	0	6	/	2	0	2	0

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ANY CHANGE IN INFORMATION SHOULD BE REPORTED WITHIN 10 DAYS.

Office  
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FEC FORM 1  
(Revised 06/2012)

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Name of  
CandidateCandidate  
Party AffiliationOffice  
Sought:

House

Senate

President

State

District

- (c) ☐ This committee supports/opposes only one candidate, and is NOT an authorized committee.

Name of  
Candidate**Party Committee:**

- (d) ☐ This committee is a ☐ (National, State or subordinate) committee of the ☐ (Democratic, Republican, etc.) Party.

**Political Action Committee (PAC):**

- (e) ☐ This committee is a separate segregated fund. (Identify connected organization on line 6.) Its connected organization is a:
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- ☐ Membership Organization ☐ Trade Association ☐ Cooperative
- ☐ In addition, this committee is a Lobbyist/Registrant PAC.
- (f) ☒ This committee supports/opposes more than one Federal candidate, and is NOT a separate segregated fund or party committee. (i.e., nonconnected committee)
- ☐ In addition, this committee is a Lobbyist/Registrant PAC.
- ☐ In addition, this committee is a Leadership PAC. (Identify sponsor on line 6.)

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- (g) ☐ This committee collects contributions, pays fundraising expenses and disburses net proceeds for two or more political committees/organizations, at least one of which is an authorized committee of a federal candidate.
- (h) ☐ This committee collects contributions, pays fundraising expenses and disburses net proceeds for two or more political committees/organizations, none of which is an authorized committee of a federal candidate.

**Committees Participating in Joint Fundraiser**

1.

FEC ID number

C

2.

FEC ID number

C

3.

FEC ID number

C

4.

FEC ID number

C

Write or Type Committee Name

**Save America Fund****6. Name of Any Connected Organization, Affiliated Committee, Joint Fundraising Representative, or Leadership PAC Sponsor**

NONE

Mailing Address

CITY

STATE

ZIP CODE

Relationship: ☐ Connected Organization ☐ Affiliated Committee ☐ Joint Fundraising Representative ☐ Leadership PAC Sponsor**7. Custodian of Records:** Identify by name, address (phone number -- optional) and position of the person in possession of committee books and records.

Full Name

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Mailing Address

One Park Row

5th Floor

Providence

RI

02903

Title or Position

CITY

STATE

ZIP CODE

Treasurer

Telephone number

401

454

0990

**8. Treasurer:** List the name and address (phone number -- optional) of the treasurer of the committee; and the name and address of any designated agent (e.g., assistant treasurer).Full Name  
of Treasurer

Galvin, Edward, , ,

Mailing Address

One Park Row

5th Floor

Providence

RI

02903

Title or Position  
Treasurer

CITY

STATE

ZIP CODE

Telephone number

401

454

0990

Full Name of  
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Mailing Address

Title or Position

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02903

CITY

STATE

ZIP CODE

Name of Bank, Depository, etc.

Mailing Address

CITY

STATE

ZIP CODE

# **Exhibit 3**

# FIRE MITCH

## SAVEAMERICA



### Donate Now. Fire Mitch.

Mitch McConnell is single-handedly blocking a fair impeachment trial in the Senate. He packed the courts with right-wing judges. He's enabled Trump's agenda, stopping progress on gun reform, health care and so much more.

Mitch McConnell must go. Now.

We have a huge opportunity to defeat him in November with Democrat Amy McGrath. This race could very well decide control of the U.S. Senate. But we need your help now!

Here is what they are saying about us:

This is a big deal that Eric [Hyers] will lead this effort, given his recent success in ousting the other unpopular Republican in Kentucky in a race that many didn't think was winnable. He knows this electorate better than anyone. We very strongly encourage donors to give to [Fire Mitch, Save America].

**--Mark Nickolas, Campaign Manager, Amy McGrath for Senate**

Donate now to fire Mitch and save America!

**1) Amount**

2) Details

3) Payment

Your contribution will benefit Save America Fund.

**\$25**

**\$50**

**\$100**

**\$250**

**\$1,000**

**\$2,500**

**\$5,000**

**\$ 100,00**

**Continue**

#### Contribution rules

1. I am a U.S. citizen or lawfully admitted permanent resident (i.e., green card holder).
2. This contribution is made from my own funds, and funds are not being provided to me by another person or entity for the purpose of making this contribution.
3. I am making this contribution with my own personal credit card and not with a corporate or business credit card or a card issued to another person.
4. I am at least eighteen years old.
5. I am not a federal contractor.

By proceeding with this transaction, you agree to ActBlue's terms & conditions.



# Exhibit 4

# FIRE MITCH

## SAVEAMERICA



### Donate Now. Fire Mitch.

Mitch McConnell is single-handedly blocking a fair impeachment trial in the Senate. He packed the courts with right-wing judges. He's enabled Trump's agenda, stopping progress on gun reform, health care and so much more.

Mitch McConnell must go. Now.

We have a huge opportunity to defeat him in November with Democrat Amy McGrath. This race could very well decide control of the U.S. Senate. But we need your help now!

Here is what they are saying about us:

This is a big deal that Eric [Hyers] will lead this effort, given his recent success in ousting the other unpopular Republican in Kentucky in a race that many didn't think was winnable. He knows this electorate better than anyone. We very strongly encourage donors to give to [Fire Mitch, Save America].

**--Mark Nickolas, Campaign Manager, Amy McGrath for Senate**

Donate now to fire Mitch and save America!

**1) Amount**

2) Details

3) Payment

Your contribution will benefit Save America Fund.

**\$25**

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**\$250**

**\$1,000**

**\$2,500**

**\$5,000**

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**Continue**

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