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2020 JAN 22 PM 2: 41

BEFORE THE FEDERAL ELECTION COMMISSION

COMMON CAUSE
805 Fifteenth Street, NW, Suite 800
Washington, DC 20005
(202) 833-1200

PAUL S. RYAN
805 Fifteenth Street, NW, Suite 800
Washington, DC 20005
(202) 833-1200

v.

MUR No. 7683

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2020 JAN 22 PM 11:50

OUR REVOLUTION
PO Box 66208
Washington, DC 20035

COMPLAINT

- This complaint is filed pursuant to 52 U.S.C. § 30109(a)(1) and is based on information providing reason to believe that Our Revolution (FEC I.D.#C90017005) was established by Senator Bernie Sanders and, consequently, is subject to the “soft money” prohibition of the Federal Election Campaign Act (FECA), which provides that a federal candidate or officeholder, or “an entity directly or indirectly established” by a federal candidate or officeholder, shall not “solicit, receive, direct, transfer, or spend funds in connection with an election for Federal

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office, including funds for any Federal election activity, unless the funds are subject to the limitations, prohibitions, and reporting requirements” of FECA. 52 U.S.C. § 30125(e)(1)(A).¹

2. On March 5, 2018, complainants filed a complaint against America First Policies et al. (MUR 7340), established by President Donald J. Trump, alleging violation of the same FECA “soft money” prohibition on the ground that America First Policies solicited, received and spent funds in connection with federal elections not subject to limitations, prohibitions, and reporting requirements of FECA. 52 U.S.C. § 30125(e)(1)(A). The complaint remains pending before the Federal Election Commission (hereinafter “Commission” or “FEC”).²
3. Soon after the 2002 passage of this McCain-Feingold “soft money” prohibition, the Commission reiterated and applied the plain language of the statute in Advisory Opinion 2003-12 (Flake). The Commission advised then-Congressman Jeff Flake that a state ballot measure committee he had established, named STMP, was subject to the FECA “soft money” prohibition. The Commission analogized such entity to a leadership PAC—concluding that the same \$5,000 per year contribution limit is applicable to both types of entity. The Commission opined that, under the “soft money” prohibition, “STMP ... may raise up to a *total* of \$5,000

¹ FECA’s “soft money” provision also prohibits an entity established by a federal candidate/officeholder from soliciting, receiving, directing, transferring, or spending funds in connection with any non-federal election unless the funds comply FECA’s contribution amount limits and source prohibitions. 52 U.S.C. § 30125(e)(1)(B). Complainants’ review of Our Revolution’s activities suggests that much of its self-described work to identify and mobilize voters for nonfederal candidates took place in elections with federal candidates on the same ballot, rendering that work “Federal election activity” under FEC. For this reason, complainants limit allegations in this complaint to violations of 52 U.S.C. § 30125(e)(1)(A). An investigation by the Federal Election Commission could reveal violations of 52 U.S.C. § 30125(e)(1)(B) as well.

² *Common Cause and Paul S. Ryan v. President Donald J. Trump et al.*, COMPLAINT, Mar. 5, 2018, https://www.commoncause.org/wp-content/uploads/2018/11/CC-v.-Trump_FEC-Complaint_3.5.18_signed_without-Appendix.pdf.



per calendar year from any particular permissible source[.]” Ad. Op. 2003-12 at 8 (emphasis in original); see *also* Ad. Op. 2003-12 at 12.

4. Based on publicly available data and published reports, complainants have reason to believe that Our Revolution was established by Senator Bernie Sanders and has solicited, received, and spent funds not subject to the limitations, prohibitions, and reporting requirements of FECA (*i.e.*, “soft money”) in connection with an election for Federal office in violation of 52 U.S.C. §§ 30125(e) (“soft money” prohibition), 30104 (reporting requirements), 30116 (contribution amount limits) and possibly 30118 (corporation/labor organization contribution prohibition), 30119 (government contractor contribution prohibition) and 30121 (foreign national contribution prohibition).
5. Furthermore, although a Commission regulation provides that an entity established by an officeholder may request a determination by the Commission via advisory opinion that the entity is no longer covered by the “soft money” prohibition because “all material connections between the sponsor and the entity have been severed for two years,” 11 C.F.R. § 300.2(c)(4)(ii), to complainants’ knowledge Our Revolution has not sought such a determination and the Commission would be unlikely to make such a determination given the material connections between Senator Sanders and Our Revolution maintained in the years following Our Revolution’s founding.
6. “If the Commission, upon receiving a complaint . . . has reason to believe that a person has committed, or is about to commit, a violation of [the FECA] . . . [t]he Commission **shall** make an

investigation of such alleged violation” 52 U.S.C. § 30109(a)(2) (emphasis added); see also 11 C.F.R. § 111.4(a).

7. “A ‘reason to believe’ finding followed by an investigation would be appropriate when a complaint credibly alleges that a significant violation may have occurred, but further investigation is required to determine whether a violation in fact occurred and, if so, its exact scope.” Federal Election Commission (hereinafter “Commission” or “FEC”), Statement of Policy Regarding Commission Action in Matters at the Initial Stage in the Enforcement Process, 72 Fed. Reg. 12545 (March 16, 2007).

FACTS

8. Senator Bernie Sanders has been a federal officeholder since his election to the U.S. House of Representatives in 1990 (FEC I.D.#H8VT01016), has served as a U.S. Senator since 2006 (FEC I.D.#S4VT00033), and is a candidate for election to the office of President in the 2020 election (FEC I.D.#P60007168).³
9. In 2016, Senator Sanders established Our Revolution, a nonprofit corporation that claims federal tax exempt status under section 501(c)(4) of the Internal Revenue Code.⁴
10. On July 15, 2016, *USA Today* published excerpts from an exclusive interview with Senator Sanders, in which Sanders explained his launch of Our Revolution to “help recruit, train and fund progressive candidates' campaigns” and that Our Revolution “will work with several

³ Bernard Sanders, FEC Form 2 Statement of Candidacy, filed February 19, 2019, <https://docquery.fec.gov/pdf/558/201902199145527558/201902199145527558.pdf>.

⁴ See Bylaws of Our Revolution, Art. II, Nov. 14, 2016, <https://ourrevolution.com/bylaws/>.



progressive groups to train and vet candidates.” Sanders further explained that “his effort is unique in that **it will build off his campaign and the millions of names in its database.**”⁵

11. Our Revolution registered with the District of Columbia as a corporation on July 15, 2016.⁶ Our Revolution’s 2016 federal tax return (IRS Form 990) indicates that Our Revolution’s “tax year” began July 18, 2016, suggesting that the entity was legally created on or around July 18, 2016.⁷
12. On August 3, 2016, *USA Today* reported that Senator Sanders had begun fundraising for Our Revolution.⁸
13. Complainant Paul S. Ryan commented to *ABC News* in August 2016 that “Our Revolution’s connection to a federal officeholder could require the group to disclose its donors and cap the amount of money it can accept from contributors under the McCain-Feingold campaign finance law.”⁹
14. *ABC News* further reported that “[a]ides to the senator said he was interested in finding a way to use his hard-earned and active email list to support down-ticket candidates this cycle, but

⁵ Nicole Gaudiano, “Bernie Sanders will launch organizations to spread progressive message,” *USA TODAY*, July 15, 2016, <https://www.usatoday.com/story/news/politics/elections/2016/07/15/bernie-sanders-progressive-message/87073052/> (emphasis added).

⁶ See District of Columbia Department of Consumer and Regulatory Affairs, Our Revolution—Initial File Number: N00005478000, Registration / Effective Date: July 15, 2016, <https://corponline.dcre.dc.gov/BizEntity.aspx/ViewContact?bizEntityContactId=662026¤tTabConfigurationId=591>.

⁷ Our Revolution, IRS Form 990 Return of Organization Exempt From Income Tax for 2016, Apr. 27, 2018 (Public Inspection Copy).

⁸ Nicole Gaudiano, “Bernie Sanders seeks contributions for 'Our Revolution',” *USA TODAY*, Aug. 3, 2016, <https://www.usatoday.com/story/news/politics/onpolitics/2016/08/03/bernie-sanders-seeks-contributions-our-revolution/88038338/>.

⁹ Jonathan Karl and Benjamin Siegel, “Bernie Sanders’ New Political Group Raises Campaign Finance Questions,” *ABC NEWS*, Aug. 19, 2019, <https://abcnews.go.com/Politics/bernie-sanders-political-group-raises-campaign-finance-questions/story?id=41520854>.



also wanted a place to educate and mentor supporters who may be inspired to run for office down the road.”¹⁰

15. On August 24, 2016, Senator Sanders publicly announced the launch of Our Revolution via live video stream to a reported 2,600 watch parties held across the United States.¹¹ The *Washington Post* reported:

Bernie Sanders launched his long-awaited post-primary movement, Our Revolution, with the fanfare of a presidential campaign. He was introduced by the environmentalist Bill McKibben, who described Sanders as “the most popular politician in America” with plenty of unfinished tasks. For a full hour, Sanders told an audience in Burlington, Vt. — and tens of thousands of online viewers — that they had moved the center of American politics to the left, and could join him in backing “over a hundred candidates” and “seven key ballot initiatives” around America.¹²

16. At the time of Our Revolution’s public launch in August 2016, Sanders’ 2016 presidential campaign manager Jeff Weaver accepted the job of leading the new organization “after being approached by Sanders’s wife Jane.”¹³
17. Days after Our Revolution’s public launch, complainant Paul S. Ryan was quoted in a *Brattleboro Reformer* article explaining the potential illegality of Our Revolution’s planned actions:

Paul S. Ryan, deputy executive director of the nonpartisan Campaign Legal Center in Washington, D.C., said that although Sanders may not have an official title at Our

¹⁰ *Id.*

¹¹ Amy Goodman, “‘Our Revolution’? Bernie Sanders Launches New Organization, But Key Staffers Quit in Protest,” DEMOCRACY NOW, Aug. 25, 2016, https://www.democracynow.org/2016/8/25/our_revolution_berniesanders_launches_new.

¹² David Weigel and John Wagner, Bernie Sanders launches ‘Our Revolution’ with electoral targets — and a few critics left behind,” WASHINGTON POST, Aug. 24, 2016, <https://www.washingtonpost.com/news/post-politics/wp/2016/08/24/bernie-sanders-launches-our-revolution-with-electoral-targets-and-a-few-critics-left-behind/>.

¹³ *Id.*



Revolution, the McCain-Feingold Act specifically applies even if an officeholder “directly or indirectly established” the organization.

Ryan pointed to a publicized news article on the Our Revolution website that refers to the group as “Bernie Sanders’ new organization.”

“Our Revolution is touting on its home page that it’s Bernie Sanders’ new organization,” Ryan said. “That to me strikes me as an admission that it was established by Bernie Sanders. The legal conclusion I draw from that is that the McCain-Feingold soft money ban applies.”

If applied to Our Revolution, the McCain-Feingold rules would take away some of the major benefits of a 501(c)(4). The group would be mandated to disclose donors who give more than \$200 and could not accept donations from corporations or unions. There would also be a \$5,000 cap on individual donations per year, according to Ryan.¹⁴

18. The *Brattleboro Reformer* further reported:

According to registration documents filed with the Department of Consumer and Regulatory Affairs on July 15, the senator’s wife, Jane O’Meara Sanders, is one of five registered board members of the organization. However, NBC News reported Wednesday that she has resigned “in part out of legal concerns over how close the senator should be to the group.”

The other directors of Our Revolution are Sanders’ former campaign spokesman, Michael Briggs; Huck Gutman, former chief of staff to Sanders; longtime adviser Richard Sugarman; and Brad Deutsch, who served as the lead legal counsel to his presidential campaign.¹⁵

19. On November 4, 2016, Our Revolution made \$240,000 in expenditures supporting federal election candidates Russ Feingold and Deborah Ross.¹⁶

¹⁴ Jasper Craven, “Sanders’ kickoff of nonprofit answers some questions, raises others,” BRATTLEBORO REFORMER, Aug. 29, 2016, <https://www.reformer.com/stories/sanders-kickoff-of-nonprofit-answers-some-questions-raises-others,144103>.

¹⁵ *Id.*

¹⁶ Our Revolution, FEC Form 5 “Report of Independent Expenditures Made and Contributions Received,” Nov. 5, 2016, <https://docquery.fec.gov/pdf/341/201611079037128341/201611079037128341.pdf>.



20. On November 15, 2016, a book authored by Senator Sanders entitled *Our Revolution: A Future to Believe In* was published, in which Sanders recounts experiences from the 2016 presidential campaign trail and outlines his general public policy agenda.¹⁷
21. In June 2017, Our Revolution announced¹⁸ the appointment of Nina Turner as the organization's new president, replacing Jeff Weaver. Turner had previously served as a member of Our Revolution's board of directors.¹⁹
22. In April 2018, Our Revolution registered a separate segregated fund committee with the Commission, Our Revolution PAC (FEC I.D.#C00676684).²⁰ During the 2018 election cycle, Our Revolution PAC reported total receipts of \$88,975, consisting of contributions raised subject to the limitations and prohibitions of FECA. During the 2018 election cycle, Our Revolution PAC reported total disbursements of \$39,815, consisting almost entirely (\$30,575) of contributions to nonfederal candidates and ballot measure committees.²¹ During the 2020 election cycle to date, Our Revolution PAC has reported total receipts of \$13,078 and total disbursements of

¹⁷ Bernie Sanders, *OUR REVOLUTION: A FUTURE TO BELIEVE IN*, Nov. 15, 2016, <https://www.amazon.com/Our-Revolution-Believe-Bernie-Sanders/dp/1250132924>.

¹⁸ Our Revolution, "Our Revolution Board Announces New President," June 29, 2017, <https://ourrevolution.com/press/our-revolution-board-announces-new-president/> and in APPENDIX.

¹⁹ Our Revolution, "Founding Statement of Our Revolution Board of Directors," Jan. 11, 2017, <https://ourrevolution.com/press/founding-statement-of-our-revolution-board/> and in APPENDIX.

²⁰ Our Revolution PAC, FEC Form 1 Statement of Organization, Apr. 18, 2019, <https://docquery.fec.gov/pdf/599/201804189110343599/201804189110343599.pdf>.

²¹ Our Revolution PAC, FEC I.D.#C00676684, Financial Summary 2017-18, <https://www.fec.gov/data/committee/C00676684/?cycle=2018&tab=summary>.



\$5,106.²² Because these funds were raised and spent subject to the limitations, prohibitions and reporting requirements of FECA, the activities of Our Revolution PAC are not at issue in this complaint.

23. In August 2018, Our Revolution explicitly acknowledged that it was established by Senator Sanders, issuing a press release stating: “Our Revolution, the political entity founded by Sen. Bernie Sanders today announced unprecedented growth during the organization’s first 24 months of existence.”²³
24. Also in August 2018, Our Revolution issued a press release “celebrat[ing] the historic victory of Andrew Gillum in the primary for Governor of Florida” and noting that it was “part of a national coalition supporting Gillum’s progressive campaign” that “spent \$3.5 million on door-to-door canvasses, phone-banks, texting, mail, digital, and radio and TV ads, to activate voters who may not have participated in past primary elections, including young voters, Black voters, Latino voters and the growing community of Puerto Rican voters.”²⁴

²² Our Revolution PAC, FEC I.D.#C00676684, Financial Summary 2019-20, https://www.fec.gov/data/disbursements/?committee_id=C00676684&two_year_transaction_period=2020&cycle=2020&line_number=F3X-21B&data_type=processed.

²³ See, e.g., Our Revolution, “Bernie Sanders-Inspired Group Celebrates 2-Year Anniversary and Boasts a Near 50 Percent Win Rate for Endorsed Candidates,” Aug. 22, 2018, <https://ourrevolution.com/press/bernie-sanders-inspired-group-celebrates-2-year-anniversary-and-boasts-near-50-percent-win-rate-endorsed-candidates/> and in APPENDIX.

²⁴ Our Revolution, “Our Revolution Celebrates Andrew Gillum’s Historic Primary Victory,” Aug. 28, 2018, <https://ourrevolution.com/press/our-revolution-celebrates-andrew-gillums-historic-primary-victory/> and in APPENDIX.



25. Following the November 2018 federal, state and local elections, Our Revolution issued a press release noting that it had endorsed 196 candidates in 44 states and touting its “electoral victories”:

Just two years into the organization’s history, Our Revolution and its local groups continued to build a track record of electoral victories. The group’s endorsed candidates won races at every level of government and from coast-to-coast in Tuesday’s midterm elections. From school board, to state legislatures, to Congress, Our Revolution candidates won big and did so while being among the most diverse and most progressive in the field.

....

Our Revolution won over 70 races endorsed this cycle including:

Rashida Talib, U.S. Congress (MI-13)
 Ilhan Omar, U.S. Congress (MN-5)
 Deb Haaland U.S. Congress, (NM-1)
 Alexandria Ocasio-Cortez, (NY-14)
 Keith Ellison, Minnesota Attorney General
 Summer Lee, Pennsylvania House, District 34
 Sara Innamorato, Pennsylvania House, District 21
 Florida Amendment 4, YES on Second Chances
 Massachusetts Question 2, Reforming campaign finance law
 Massachusetts Question 3, Protecting transgender people from discrimination²⁵

26. On February 19, 2019, Senator Sanders announced that he is seeking the Democratic Party’s 2020 presidential election nomination.²⁶

²⁵ Our Revolution, “Political Revolution Picks Up Momentum in 2018 Midterm Elections,” Nov. 8, 2018, <https://ourrevolution.com/press/political-revolution-picks-momentum-2018-midterm-elections/> and in APPENDIX.

²⁶ Scott Detrow and Jessica Taylor, “Bernie Sanders Launches 2020 Presidential Campaign, No Longer An Underdog,” NPR, Feb. 19, 2019, <https://www.npr.org/2019/02/19/676923000/bernie-sanders-enters-2020-presidential-campaign-no-longer-an-underdog>; see also Bernard Sanders, FEC Form 2 Statement of Candidacy, filed February 19, 2019, <https://docquery.fec.gov/pdf/558/201902199145527558/201902199145527558.pdf>.

27. On February 19, 2019, Our Revolution issued a press release “celebrat[ing] Sen. Bernie Sanders’ announcement that he will seek the Democratic nomination for president in 2020” after co-hosting “hundreds of live stream house parties and community barnstorms organizing people to encourage Sen. Sanders to run.”²⁷ Our Revolution explained: “With over 600 local groups in all 50 states and nine countries, Our Revolution is uniquely prepared to mobilize voters across the country and abroad to support Sen. Sanders in the Democratic primary.” Our Revolution Board Chair Larry Cohen is quoted in the release explaining further:

For the past two and a half years, Our Revolution local groups have been organizing in their communities, building power, achieving victories, and hoping for this announcement. ... The coalitions they’ve entered into and relationships they’ve built have placed them in a unique position to organize across the progressive movement to build an active and engaged grassroots network. Now is the time for us to draw on these connections, rallying behind Sen. Sanders as he runs for the Democratic nomination.

28. On February 21, 2019, Our Revolution’s president Nina Turner announced “she would take a leave of absence from her position as president of Our Revolution to serve as co-chair of Vermont Sen. Bernie Sanders’ 2020 presidential campaign.”²⁸ Turner stated:

Our Revolution has been the keeper of the flame doing the vital work of building a grassroots movement that leverages the people’s agenda[.] Senator Sanders’ 2020 campaign is a reflection of that work and I look forward to joining his team as a co-chair to ensure we have a true progressive champion in the White House dedicated to racial, social, economic, and political justice.

²⁷ Our Revolution, “Our Revolution Celebrates Sen. Sanders’ Decision to Run for President,” Feb. 19, 2019, <https://ourrevolution.com/press/our-revolution-celebrates-sen-sanders-decision-run-president/> and in APPENDIX.

²⁸ Seth A. Richardson, “Former Ohio Sen. Nina Turner to serve as co-chair of Bernie Sanders campaign,” CLEVELAND.COM, Feb. 21, 2019, <https://www.cleveland.com/politics/2019/02/former-ohio-sen-nina-turner-to-serve-as-co-chair-of-bernie-sanders-campaign.html>.



Turner was reportedly planning to “continue to sit on the board of Our Revolution” during her leave of absence to serve as co-chair of Sanders’ 2020 campaign.²⁹ As recently as November 7, 2019,³⁰ Turner was listed on Our Revolution’s website as a member of its board of directors, but as of January 10, 2020 Turner was no longer listed on the website as a board member.³¹

29. Facebook’s Ad Library,³² which includes ads that Our Revolution has paid to disseminate on both Facebook and Instagram, indicates that since Senator Sanders announced his 2020 campaign for the presidency, **Our Revolution has made expenditures to promote ads expressly advocating Sanders’ election and soliciting contributions** for Our Revolution to support this work.³³ The following are examples of such ads.

²⁹ *Id.*

³⁰ Our Revolution, “Our Board,” Web Archive Capture Nov. 7, 2019, <https://web.archive.org/web/20191107053752/https://ourrevolution.com/about/>.

³¹ Our Revolution, “Our Board,” Jan. 10, 2020 <https://ourrevolution.com/about/#board>.

³² In 2018, Facebook launched an online archive of advertisements disseminated on the Facebook platform. In March 2019, Facebook expanded and rebranded this resource as the Facebook Ad Library, to “make[] good on its promise to increase transparency after the social network’s ads were used to try to influence the 2016 U.S. presidential elections.” Josh Constine, “Facebook launches searchable transparency library of all active ads,” TECH CRUNCH, Mar. 28, 2019, <https://techcrunch.com/2019/03/28/facebook-ads-library/>.

³³ Facebook Ad Library, Our Revolution, visited Jan. 16, 2020, https://www.facebook.com/ads/library/?active_status=all&ad_type=all&country=US&impression_search_field=has_impressions_lifetime&view_all_page_id=1194419550610259.



Our Revolution

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ID: 2765085863546490



Bernie Sanders is directly challenging the power of multinational corporations that buy political influence through donations, but he can't do it alone. That's why Our Revolution is building a people-powered movement powerful enough to defeat these special interests.

Give to Our Revolution now so that we can organize working-class Americans to help Bernie get elected President and take on these special interests.



Help Fight Against Special Interest Groups

Give Now

Donate Now

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Our Revolution

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ID: 437479170516006



We are so close to electing Bernie Sanders and making America a democracy that represents people, not multinational corporations and their favorite candidates. Chip in whatever you can to help Our Revolution and Bernie finish what we started.



Time For A Democracy For The People

Chip In

Donate Now

SECURE.ACTBLUE.COM





Our Revolution

Sponsored • Paid for by Our Revolution

ID: 374650966423232



Bernie has announced he's running for President, and we need to show him that we have his back. Chip in today >>



Bernie can beat Trump

Donate

OURREVOLUTION.COM

Donate Now

30. Facebook's Ad Library states that Our Revolution has spent more than \$14,000 since May 2018 promoting "ads about social issues, elections or politics."³⁴
31. Our Revolution's solicitations typically link to an ActBlue contribution processing page that does not limit the amount of a contribution and does not on its face foreclose corporate, labor organization, government contractor or foreign national contributions and, instead, explicitly permits contribution of funds from an "authorizing corporation."³⁵ The following is a January 16, 2020 screen capture of Our Revolution's "DONATE" page.

³⁴ *Id.*

³⁵ Our Revolution Donate Page, <https://secure.actblue.com/contribute/page/ourrevolution>.





THIS IS YOUR REVOLUTION

Our Revolution is fighting to transform America and advance the progressive agenda that we believe in.

Make a contribution to Our Revolution today.

If you prefer to donate by check, contributions should be made payable to Our Revolution and mailed to the address below:

Our Revolution
PO Box 66208
Washington, DC 20035

1) Amount

2) Payment

3) Details

Your contribution will benefit Our Revolution.

\$15	\$27	\$50	\$100
\$250	\$500	\$1,000	\$ <input type="text"/>

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Contribution rules

1. ActBlue Civics is a registered charitable organization formed to democratize social welfare giving. A copy of our latest financial report may be obtained by emailing info@actblue.com or calling (617) 517-7600. Alternatively, our report detailing our programs, a financial summary, and the percentage of contributions dedicated to our purpose, along with a copy of our license, may be obtained from the following state agencies: FLORIDA (registration #CH48620) – Division of Consumer Services 800-435-7352 www.800helpfla.com; GEORGIA (registration #CH012404) – contact ActBlue Civics; MARYLAND (registration #32940) – Secretary of State, State House, Annapolis, MD 21401; NEW JERSEY (registration #CH3992100) – Attorney General, 973-504-6215, www.state.nj.us/lps/ca/charfrm.htm; NEW YORK (registration #45-70-70) – Attorney General, Charities Bureau, 120 Broadway, New York, NY 10271; NORTH CAROLINA (registration #SL010079) – State Soliciting Licensing Branch, 888-830-4969; PENNSYLVANIA (registration #106113) – Department of State, 800-732-0999; VIRGINIA – Office of Charitable and Regulatory Programs, PO Box 1163, Richmond, VA 23218; WASHINGTON (registration #38989) – Secretary of State, Charities Division, Olympia, WA 98504-0422, 800-332-4483; WISCONSIN (registration #16863-800) – contact ActBlue Civics. Registration with and reporting to these agencies does not imply endorsement, approval, or recommendation of ActBlue Civics.
2. I am at least eighteen years old.
3. This contribution is made from my own funds or the funds of an authorizing corporation or other entity, and the funds are not being provided by any other person or entity.

By proceeding with this transaction, you agree to ActBlue's [terms & conditions](#).

32. Our Revolution has made clear its dedication to activities defined under FECA and Commission regulations as “Federal election activity”—i.e., voter registration, voter ID and GOTV—in connection with the 2020 Iowa presidential caucuses. As reported last month in Iowa’s *Quad*

City Times:

Larry Cohen, [Chair of Our Revolution’s Board of Directors and] former president of the Communications Workers of America International, said that a grassroots movement needs to be built in the pivot counties of eastern Iowa to get people to caucus for Sanders.

Cohen called for 125 volunteers to agree to adopt 50 Our Revolution members between now and Feb. 3 and encourage them to caucus.

“We’re building a grassroots movement to get Bernie elected as president and that begins with the Iowa caucus,” he said.³⁶

33. In early January 2020, Our Revolution sent out an email under Larry Cohen’s name soliciting contributions, noting that Cohen had “spent a week in eastern Iowa seeking volunteers to help turnout the 5,000 Our Revolution supporters in critical pivot counties that had voted twice for Barack Obama but then went for Donald Trump in 2016.” The email continued: “Our goal is not just to mobilize these Obama/Trump voters for the caucuses, but also to sustain their involvement in support of the Democratic nominee through November and beyond.” Our Revolution asked supporters to “donate whatever you can afford to help us win Iowa and catapult Bernie Sanders to the Democratic nomination,” and to “[d]onate now to help us

³⁶ Thomas Geyer, “Bernie organizations urge unions to help flip eastern Iowa counties that voted for Trump,” QUAD-CITY TIMES, Dec. 18, 2019, https://qctimes.com/news/local/bernie-organizations-urge-unions-to-help-flip-eastern-iowa-counties/article_be4156d1-21fa-5159-bf25-e2dd1eb407fc.html

organize Obama/Trump voters and ensure that we nominate Bernie Sanders instead of a corporate Democrat who could easily lose to Trump in 2020!”³⁷

34. On January 3, 2020, Our Revolution Executive Director Joseph Geevarghese in an interview on HILL.TV program *Rising* was asked to respond to the “knock on Our Revolution” from “establishment Democrats” that moderate Democrats, not progressives, won back the House of Representatives in 2018. Geevarghese replied: “We have a[n] incredibly powerful movement that has put Bernie Sanders at the front of the pack. We have elected unprecedented numbers of progressives up and down the ballot, everything from dog catcher to county commissioner.”³⁸

35. On January 7, 2020, the Associated Press published an article noting that Our Revolution “aims to boost voter turnout for Sanders” and quoting Our Revolution spokesman Paco Fabian saying: “We invest our money ... in things like organizing and phone banks and canvassing voters on issues that matter. We aren’t running ads or doing glossy mailers[.]”³⁹ The Associated Press explained:

[Our Revolution’s] money has financed a sprawling volunteer-driven operation to mobilize Sanders supporters that could be crucial to his chances of winning.

Last weekend, Our Revolution touted its outreach in eastern Iowa counties that voted for both Barack Obama and President Donald Trump, announcing a goal of enlisting 5,000 volunteers to help tilt next month’s caucuses in Sanders’ favor. On social media, it has amplified Sanders’ speeches and campaign initiatives while

³⁷ Our Revolution Email, “Subject: the reign of centrism in the Democratic party is over,” Jan. 6, 2020, <https://politicalemails.org/messages/88636>.

³⁸ *Rising with Krystal Ball and Saagar Enjeti*, HILL.TV, Jan. 3, 2020, available at <https://youtu.be/gx-re9eoVi4>.

³⁹ Brian Slodysko, “Shadow group provides Sanders super PAC support he scorns,” ASSOCIATED PRESS, Jan. 7, 2020, <https://apnews.com/345bbd1af529cfb1e41305fa3ab1e604>.

attacking his rivals. It has also sent out a steady stream of fundraising emails, which explicitly advocate for Sanders' election.

Sanders founded Our Revolution to further the political movement galvanized by his unsuccessful 2016 campaign for the Democratic presidential nomination, though Our Revolution leaders say he hasn't held a formal role since its first governing board was appointed in 2016.

The group, which also includes scores of local affiliates across the U.S., initially backed a series of candidates in Sanders' mold during the 2018 midterms. But after he entered the 2020 contest, its focus has shifted toward his candidacy.⁴⁰

36. The Associated Press further reported in its January 7 article that in September 2019 Senator Sanders "joined an organization-wide conference call celebrating Our Revolution's third anniversary and thanked the group for doing 'some of the most important work that can be done in our country.'"⁴¹ An internet search by complainants led to this invitation from Our Revolution to the group's September 10, 2019 call:⁴²

⁴⁰ *Id.*

⁴¹ *Id.*

⁴² Unity Feed, "JOIN: conference call with Bernie Sanders," Sept. 6, 2019, <https://unityfeed.com/doc/30167/join-conference-call-with-bernie-sanders/>.



Our Revolution Member,

The next President of the United States, and the inspiration behind Our Revolution, Senator Bernie Sanders will be joining our monthly member call on Tuesday, September 10th at 8:30 PM ET!

Bernie will be discussing our third anniversary, our game-changing accomplishments and what's next for the political revolution!

[Click here to sign up for our call with Bernie Sanders on Tuesday, September 10th at 8:30 PM ET!](#)



Join Bernie Sanders LIVE!

Join Bernie on our monthly member call on Tuesday September 10th at 8:30 pm ET and celebrate our 3rd anniversary!



TUESDAY, SEPTEMBER 10TH

8:30 PM ET 7:30 PM CT 6:30 PM MT 5:30 PM PT



MEMBERS-ONLY CALL

Space is limited. **RSVP NOW** to guarantee a spot and hear Bernie's important message to grassroots activists.

37. Our Revolution's federal tax returns indicate that the organization employed 25 individuals in 2016, 30 individuals in 2017 and 36 individuals in 2018.⁴³
38. Since its formation in 2016 through 2018, Our Revolution has reported to the Internal Revenue Service receipt of more than \$9.5 million in total contributions and grants and 19 contributions

⁴³ Our Revolution, IRS Form 990 Return of Organization Exempt From Income Tax for 2016, Apr. 27, 2018 (Public Inspection Copy); Our Revolution, IRS Form 990 Return of Organization Exempt From Income Tax for 2017, Nov. 16, 2018 (Public Inspection Copy); Our Revolution, IRS Form 990 Return of Organization Exempt From Income Tax for 2018, Nov. 14, 2019 (Public Inspection Copy).

exceeding \$5,000, including contributions of \$300,000 (2016), \$100,000 (2017), \$195,000 (2018) and \$218,309 (2018).⁴⁴ Federal tax law does not require Our Revolution to disclose to the public the identities of its donors. Our Revolution discloses on its website the names of its donors who have given more than \$250 in a calendar year, but does not disclose the amount of a donor's contribution.⁴⁵

SUMMARY OF THE LAW

“SOFT MONEY” PROHIBITION

39. The FECA “soft money” prohibition provides that a “candidate, individual holding Federal office ... or an **entity directly or indirectly established** ... by or acting on behalf of 1 or more candidates or individuals holding Federal office” shall not “solicit, receive, direct, transfer, or spend funds in connection with **an election for Federal office**, including funds for any **Federal election activity**, unless the funds are subject to the limitations, prohibitions, and reporting requirements” of FECA. 52 U.S.C. § 30125(e)(1)(A) (emphasis added).
40. FECA further provides that such an entity established by a federal officeholder shall not “solicit, receive, direct, transfer, or spend funds in connection with **any election other than an election for Federal office [i.e., state or local election]** or disburse funds in connection with such an election unless the funds ... are not in excess of the amounts permitted with respect to contributions to candidates and political committees” and “are not from sources prohibited by

⁴⁴ Our Revolution, IRS Form 990 Return of Organization Exempt From Income Tax for 2016, Apr. 27, 2018 (Public Inspection Copy); Our Revolution, IRS Form 990 Return of Organization Exempt From Income Tax for 2017, Nov. 16, 2018 (Public Inspection Copy); Our Revolution, IRS Form 990 Return of Organization Exempt From Income Tax for 2018, Nov. 14, 2019 (Public Inspection Copy).

⁴⁵ Our Revolution Donors, Our Revolution Donors, <https://ourrevolution.com/donors/> (visited Jan. 15, 2020).

this Act from making contributions in connection with an election for Federal office.” 52 U.S.C. § 30125(e)(1)(B).

41. Commission regulations implementing these FECA provisions reiterate that “[e]ntities that are directly or indirectly established ... by ... one or more Federal candidates or individuals holding Federal office” shall not “solicit, receive, direct, transfer, spend, or disburse funds in connection with an **election for Federal office, including funds for any Federal election activity as defined in 11 CFR 100.24**, unless the amounts consist of Federal funds that are subject to the limitations, prohibitions, and reporting requirements of the Act.” 11 C.F.R. §§ 300.60 and 300.61 (emphasis added).
42. Commission regulations further reiterate that such an entity established by a federal officeholder “may solicit, receive, direct, transfer, spend, or disburse funds in connection with any **non-Federal election**, only in amounts and from sources that are consistent with State law, and that do not exceed [FECA’s] contribution limits or come from prohibited sources under” FECA. 11 C.F.R. § 300.62 (emphasis added).
43. Commission regulation provides that “[n]otwithstanding the fact that a [candidate/officeholder] may have established an entity within the meaning of [the FECA “soft money” ban, the candidate/officeholder] or the entity may request an advisory opinion of the Commission determining that the relationship between the sponsor and the entity has been severed. The request ... must demonstrate that **all material connections between the sponsor and the entity have been severed for two years.**” 11 C.F.R. § 300.2(c)(4)(ii) (emphasis added). Similarly, such an entity or candidate/officeholder can seek a determination by the

Commission that the candidate/officeholder is no longer “financing, maintaining, or controlling the entity” for the purposes of the “soft money” ban. 11 C.F.R. § 300.2(c)(4)(i).

44. The Commission by regulation has stated a non-exhaustive list of factors for the determination of whether a candidate or officeholder directly or indirectly established, finances, maintains, or controls an entity—factors the Commission would apply in any request for a determination that all material connections between a candidate/officeholder and entity have been severed for two years. 11 C.F.R. §§ 300.2(c)(2) and 300.2(c)(4). The Commission explains that the factors “must be examined in the context of the overall relationship between [candidate/officeholder] and the entity to determine whether the presence of any factor or factors is evidence that the [candidate/officeholder] directly or indirectly established, finances, maintains, or controls the entity.” The factors “include, but are not limited to:”

iii. Whether a sponsor, directly or through its agent, has the authority or ability to hire, appoint, demote, or otherwise control the officers, or other decision-making employees or members of the entity;

iv. Whether a sponsor has a common or overlapping membership with the entity that indicates a formal or ongoing relationship between the sponsor and the entity;

v. Whether a sponsor has common or overlapping officers or employees with the entity that indicates a formal or ongoing relationship between the sponsor and the entity;

vi. Whether a sponsor has any members, officers, or employees who were members, officers or employees of the entity that indicates a formal or ongoing relationship between the sponsor and the entity, or that indicates the creation of a successor entity;

vii. Whether a sponsor, directly or through its agent, provides funds or goods in a significant amount or on an ongoing basis to the entity, such as through direct or indirect payments for administrative, fundraising, or other costs, but not including

the transfer to a committee of its allocated share of proceeds jointly raised pursuant to 11 CFR 102.17, and otherwise lawfully;

viii. Whether a sponsor, directly or through its agent, causes or arranges for funds in a significant amount or on an ongoing basis to be provided to the entity, but not including the transfer to a committee of its allocated share of proceeds jointly raised pursuant to 11 CFR 102.17, and otherwise lawfully;

ix. Whether a sponsor, directly or through its agent, had an active or significant role in the formation of the entity[.]

11 C.F.R. §§ 300.2(c)(2).

45. The U.S. Supreme Court upheld the “soft money” prohibition against constitutional challenge in *McConnell v. FEC*, 540 U.S. 93 (2003). The Court explained that funds raised under FECA’s contribution limits were known as “hard” money and that funds raised outside of federal limits were known as “soft” money. *Id.* at 122-23. The Court further explained:

No party seriously questions the constitutionality of [the] general ban on donations of soft money made directly to federal candidates and officeholders, their agents, **or entities established or controlled by them**. Even on the narrowest reading of *Buckley*, a regulation restricting donations to a federal candidate, regardless of the ends to which those funds are ultimately put, qualifies as a contribution limit subject to less rigorous scrutiny. Such donations have only marginal speech and associational value, but at the same time pose a substantial threat of corruption. By severing the most direct link between the soft-money donor and the federal candidate, [the] ban on donations of soft money is closely drawn to prevent the corruption or the appearance of corruption of federal candidates and officeholders.

Id. at 182-83 (emphasis added). Given the “substantial threat of corruption or its appearance posed by donations to or at the behest of federal candidates and officeholders,” the Court held that the “soft money” prohibition is “clearly constitutional.” *Id.* at 183-84.

46. Soon after the 2002 passage of the McCain-Feingold law, then-Congressman Jeff Flake sought an advisory opinion from the Commission regarding application of the “soft money” ban to a

state ballot measure committee named STMP that he had established. In Advisory Opinion 2003-12, the Commission explained: “Given that Representative Flake established STMP, he **and STMP** may only solicit up to \$5,000 per calendar year for STMP from any permissible donor.” Ad. Op. 2003-12 at 12 (emphasis added). Similarly, the Commission wrote: “The Commission further concludes that under 2 U.S.C. 441a(a)(1)(C) and 441i(e)(1)(B), STMP and Representative Flake may raise up to a total of \$5,000 per calendar year from any particular permissible source[.]” Ad. Op. 2003-12 at 8. The Commission explained at length:

You have indicated that STMP will be registering voters as part of its signature-gathering and ballot qualification activities. **Some of the voter registration activity planned by STMP will likely constitute [Federal election activity], which, because Representative Flake established STMP ..., must be paid for with Federal funds,** while some of this voter registration activity will not constitute FEA, and may be paid for with funds that comply with the amount limitations and source prohibitions, but not the reporting requirements, of the Act (i.e., that comply with the requirements of 2 U.S.C. 441i(e)(1)(B)).

Representative Flake may raise funds for STMP, but he must comply with the Act’s restrictions on fundraising by Federal candidates and officeholders. **Because STMP is ‘established, financed, maintained or controlled’ by Representative Flake, it, too, is subject to these restrictions.** Representative Flake and STMP ‘must not solicit, receive, direct, transfer, or spend funds in connection with an election for Federal office, including funds for any Federal election activity,’ unless the funds are subject to the limitations, prohibitions, and reporting requirements of the Act.

Also, because STMP is an entity “established, financed, maintained or controlled” by Representative Flake, the activities of STMP as described in your request (other than its Federal election activities and electioneering communications) are in connection with an election other than an election for Federal office, and thus within the scope of [FECA’s “soft money” ban]. Therefore, the solicitation restrictions of the Act regarding non-Federal elections are applicable to solicitations by Representative Flake and STMP.

Ad. Op. 2003-12 at 10-11 (citations omitted) (emphasis added).

SPENDING FUNDS “IN CONNECTION WITH AN ELECTION FOR FEDERAL OFFICE”

47. FECA and its implementing regulations make clear that an entity that is directly or indirectly established by a federal candidate or officeholder shall not “spend, or disburse funds in connection with an election for Federal office, including funds for any Federal election activity ..., unless the amounts consist of Federal funds that are subject to the limitations, prohibitions, and reporting requirements of the Act.” 11 C.F.R. §§ 300.60 and 300.61; 52 U.S.C. § 30125(e)(1).
48. “Expenditure” is defined by FECA to include “any purchase, payment ... gift of money or anything of value made by any person for the purpose of influencing any election for Federal office.” 52 U.S.C. § 30101(9)(A).
49. “Independent expenditure” is defined by FECA to mean “an expenditure by a person ... expressly advocating the election or defeat of a clearly identified candidate ... that is not made in concert or cooperation with or at the request or suggestion of such candidate, the candidate’s authorized political committee, or their agents[.]” 52 U.S.C. § 30101(17)(A).
50. “Expressly advocating” is defined at 11 C.F.R. § 100.22 to mean any communication that:
- a. Uses phrases such as ‘vote for the President,’ ... ‘Smith for Congress,’ ... or communications of campaign slogan(s) or individual word(s), which in context can have no other reasonable meaning than to urge the election or defeat of one or more clearly identified candidate(s) ... ; or
 - b. When taken as a whole and with limited reference to external events, such as the proximity to the election, could only be interpreted by a reasonable person as containing advocacy of the election or defeat of one or more clearly identified candidate(s) because—

1. The electoral portion of the communication is unmistakable, unambiguous, and suggestive of only one meaning; and
2. Reasonable minds could not differ as to whether it encourages actions to elect or defeat one or more clearly identified candidate(s) or encourages some other kind of action.

51. "Disbursement" is defined broadly to mean "any purchase or payment made by" a political committee or "[a]ny other person, including an organization that is not a political committee, that is subject to the Act." 11 C.F.R. § 300.2(d).
52. FECA defines "Federal election activity" at 52 U.S.C. § 30101(20)(A) to include:
- (i) voter registration activity during the period that begins on the date that is 120 days before the date a regularly scheduled Federal election is held and ends on the date of the election;
 - (ii) voter identification, get-out-the-vote activity, or generic campaign activity conducted in connection with an election in which a candidate for Federal office appears on the ballot (regardless of whether a candidate for State or local office also appears on the ballot); [or]
 - (iii) a public communication that refers to a clearly identified candidate for Federal office (regardless of whether a candidate for State or local office is also mentioned or identified) and that promotes or supports a candidate for that office, or attacks or opposes a candidate for that office (regardless of whether the communication expressly advocates a vote for or against a candidate)[.]
53. Commission regulations further detail the activities that constitute "Federal election activity" at 11 C.F.R. § 100.24.
54. "Voter registration activity" means, during the period beginning 120 days before a federal election and ending on the date of the election:
- (A) Encouraging or urging potential voters to register to vote, whether by mail (including direct mail), e-mail, in person, by telephone (including pre-recorded telephone calls, phone banks and messaging such as SMS and MMS), or by any other means;

- (B) Preparing and distributing information about registration and voting;
- (C) Distributing voter registration forms or instructions to potential voters;
- (D) Answering questions about how to complete or file a voter registration form, or assisting potential voters in completing or filing such forms;
- (E) Submitting or delivering a completed voter registration form on behalf of a potential voter;
- (F) Offering or arranging to transport, or actually transporting potential voters to a board of elections or county clerk's office for them to fill out voter registration forms; or
- (G) Any other activity that assists potential voters to register to vote.

11 C.F.R. §§ 100.24(a)(2)(i) and 100.24(b).

55. "Get-out-the-vote activity" means:

- (A) Encouraging or urging potential voters to vote, whether by mail (including direct mail), e-mail, in person, by telephone (including pre-recorded telephone calls, phone banks and messaging such as SMS and MMS), or by any other means;
- (B) Informing potential voters, whether by mail (including direct mail), e-mail, in person, by telephone (including pre-recorded telephone calls, phone banks and messaging such as SMS and MMS), or by any other means, about:
 - (1) Times when polling places are open;
 - (2) The location of particular polling places; or
 - (3) Early voting or voting by absentee ballot;
- (C) Offering or arranging to transport, or actually transporting, potential voters to the polls; or
- (D) Any other activity that assists potential voters to vote.

11 C.F.R. § 100.24(a)(3)(i).

56. "Voter identification" means:

[A]cquiring information about potential voters, including, but not limited to, obtaining voter lists and creating or enhancing voter lists by verifying or adding information about the voters' likelihood of voting in an upcoming election or their likelihood of voting for specific candidates.

11 C.F.R. § 100.24(a)(4).

57. "Public communication" means:

[A] communication by means of any broadcast, cable, or satellite communication, newspaper, magazine, outdoor advertising facility, mass mailing, or telephone bank to the general public, or any other form of general public political advertising. The term general public political advertising shall not include communications over the Internet, except for **communications placed for a fee on another person's Web site.**

11 C.F.R. § 100.26 (emphasis added).

SOLICITING OR RECEIVING FUNDS SUBJECT TO THE LIMITATIONS AND PROHIBITIONS OF FECA

58. FECA limits to \$5,000 per calendar year the amount of a contribution that a person can make to a non-candidate, non-party committee. 52 U.S.C. § 30116(a)(1)(C).⁴⁶
59. In Advisory Opinion 2003-12 (Flake), the Commission analogized an entity established by an officeholder under the "soft money" prohibition to a leadership PAC—concluding that the same \$5,000 per year contribution limit is applicable to an entity established by a federal candidate/officeholder. "The Commission further concludes that under 2 U.S.C. 441a(a)(1)(C)

⁴⁶ However, the Commission in Advisory Opinion 2010-11 (Commonsense Ten) interpreted and applied court decisions in *SpeechNow.org v. FEC*, 599 F.3d 686 (D.C. Cir. 2010) (*en banc*) and *Citizens United v. FEC*, 558 U.S. 310 (2010), and opined that a committee that "intends to make only independent expenditures" and that "will not make any monetary or in-kind contributions (including coordinated expenditures) to any other political committee or organization"—i.e. a so-called "independent expenditure-only political committee," a.k.a. "super PAC"—is permitted to solicit and accept unlimited contributions from individuals, corporations, labor organizations and other political committees. AO 2010-11 at 2-3.

and 441i(e)(1)(B), STMP and Representative Flake may raise up to a *total* of \$5,000 per calendar year from any particular permissible source[.]” Ad. Op. 2003-12 at 8; *see also* Ad. Op. 2003-12 at 12. The Commission explained that “[t]his \$5,000 limit is separate and distinct from the limitations on contributions” to the candidate’s/officeholder’s principal campaign committee, which is subject to a \$2,800 per election limit under 52 U.S.C. § 30116(a)(1)(A).⁴⁷ Ad. Op. 2003-12 at 12 n.16.

60. FECA prohibits a corporation or labor union from making a contribution to a federal candidate or national party committee and prohibits a candidate or national party committee from accepting or receiving a contribution from a corporation or labor union. 52 U.S.C. § 30118(a).
61. FECA prohibits any federal contractor from making any contribution to any federal candidate, party or other political committee and for any person to knowingly solicit such a contribution. 52 U.S.C. § 30119(a); 11 C.F.R. § 115.2.
62. FECA prohibits foreign nationals from making contributions in connections with U.S. elections and prohibits any person from receiving such contributions. 52 U.S.C. § 30121.
63. Commission regulation defines “solicit” to mean:

[T]o ask, request, or recommend, explicitly or implicitly, that another person make a contribution, donation, transfer of funds, or otherwise provide anything of value. A solicitation is 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.

⁴⁷ The statutory limits are \$2,000 and \$25,000, respectively, and are indexed for inflation in odd-numbered years. *See* 52 U.S.C. § 30116(c); *see also* FEC, “Contribution limits for 2019-2020,” <https://www.fec.gov/updates/contribution-limits-2019-2020/>.

11 C.F.R. § 300.2(m).

REPORTING AND DISCLOSURE REQUIREMENTS

64. Though the FECA “soft money” provision requires any entity established by a federal candidate or officeholder that spends money in connection with a federal election to comply with the “reporting requirements” of FECA, 52 U.S.C. § 30125(e)(1)(A), the statute does not specify which reporting requirements of the Act.

65. In Advisory Opinion 2003-12 (Flake), the Commission analogized a political entity established by a Congressman to a leadership PAC, explaining:

Although the relationship between Representative Flake and STMP differs somewhat from the usual relationship between a Federal officeholder or candidate and a leadership PAC, the Commission finds that the relationship is sufficiently similar to traditional leadership PACs to warrant treating Representative Flake and STMP as it has historically treated leadership PACs for affiliation purposes.

Ad. Op. 2003-12 at 8.

66. For the same reasons, a political entity falling within the scope of the FECA “soft money” provisions would meet the law’s reporting requirements by complying with the political committee reporting requirements of 52 U.S.C. § 30104, including, for example, by reporting on the scheduled specified at 52 U.S.C. § 30104(a)(4) and disclosing the contributor and expenditure information specified at 52 U.S.C. § 30104(b) (e.g., detailed information regarding contributions received and disbursements made in excess of \$200).

CAUSES OF ACTION

COUNT ONE

Reason to believe that Our Revolution was established by Senator Bernie Sanders and has solicited and received funds in connection with an election for federal office not subject to the limitations, prohibitions and reporting requirements of FECA in violation of 52 U.S.C. §§ 30125(e), 30116(a)(1)(C), 30104 and possibly 30118, 30119 and 30121.

67. Paragraphs 1 through 66 are incorporated herein.
68. The FECA “soft money” prohibition applies to any entity directly or indirectly established by one or more candidates or individuals holding federal office. 52 U.S.C. § 30125(e).
69. Based on published reports, there is reason to believe that Senator Sanders established Our Revolution—a fact readily acknowledged by Senator Sanders in press interviews at the time of Our Revolution’s formation⁴⁸ and directly by Our Revolution. For example, in celebration of the organization’s second anniversary, Our Revolution issued a press release in August 2018 that began: “Our Revolution, the political entity founded by Sen. Bernie Sanders”⁴⁹
70. Based on information and belief, Our Revolution has not requested a determination from the Commission via advisory opinion, pursuant to 11 C.F.R. § 300.2(c)(4)(ii), that “all material connections between the sponsor and the entity have been severed for two years.” And if Our

⁴⁸ See, e.g., Nicole Gaudiano, “Bernie Sanders will launch organizations to spread progressive message,” USA TODAY, July 15, 2016, <https://www.usatoday.com/story/news/politics/elections/2016/07/15/bernie-sanders-progressive-message/87073052/>.

⁴⁹ See, e.g., Our Revolution, “Bernie Sanders-Inspired Group Celebrates 2-Year Anniversary and Boasts a Near 50 Percent Win Rate for Endorsed Candidates,” Aug. 22, 2018, <https://ourrevolution.com/press/bernie-sanders-inspired-group-celebrates-2-year-anniversary-and-boasts-near-50-percent-win-rate-endorsed-candidates/> and in APPENDIX.

Revolution were to request such a determination, the Commission would likely be unable to make such a determination given the ongoing material connections between Senator Sanders and Our Revolution. In analyzing such a request, the Commission would consider factors set forth at 11 C.F.R. §§ 300.2(c)(2), including whether Sanders and Our Revolution have “common or overlapping membership,” whether Sanders and Our Revolution have “common or overlapping officers or employees,” and whether Sanders “has any members, officers, or employees who were members, officers or employees of [Our Revolution] that indicates a formal or ongoing relationship between the sponsor and the entity, or that indicates the creation of a successor entity.” 11 C.F.R. §§ 300.2(c)(2)(iv), (v) and (vi).

71. Regarding whether Sanders and Our Revolution have “common or overlapping membership,” Senator Sanders explained in July 2016 that he was establishing Our Revolution to “build off his campaign and the millions of names in its database.”⁵⁰ Also, at the time of Our Revolution’s formation, “[a]ides to the senator said he was interested in finding a way to use his hard-earned and active email list to support down-ticket candidates”⁵¹ Presumably using this Sanders 2016 campaign contributor/voter list, Our Revolution recruited its foundational members/contributors holding a live-video launch event on August 24, 2016, featuring an

⁵⁰ Nicole Gaudiano, “Bernie Sanders will launch organizations to spread progressive message,” USA TODAY, July 15, 2016, <https://www.usatoday.com/story/news/politics/elections/2016/07/15/bernie-sanders-progressive-message/87073052/>.

⁵¹ Jonathan Karl and Benjamin Siegel, “Bernie Sanders’ New Political Group Raises Campaign Finance Questions,” ABC NEWS, Aug. 19, 2019, <https://abcnews.go.com/Politics/bernie-sanders-political-group-raises-campaign-finance-questions/story?id=41520854>.

hour-long speech by Senator Sanders, streamed to a reported 2,600 watch parties held across the United States with 200,000 viewers tuning in.⁵²

72. Based on published reports, there is reason to believe that Our Revolution has, since its founding, had extensive overlap in its member/donor base with the Sanders' 2016 and 2020 campaign donor bases.
73. Two other factors for determination of whether ties between Our Revolution and Senator Sanders have been severed for at least two years are “common or overlapping officers or employees” and “any members, officers, or employees ... that indicates a formal or ongoing relationship between the sponsor and the entity, or that indicates the creation of a successor entity.”
74. According to corporate registration documents filed with the District of Columbia in July 2016, Our Revolution's five founding board members were: Senator Sanders' wife, Jane O'Meara Sanders; Sanders' former campaign spokesman, Michael Briggs; former chief of staff to Sanders, Huck Gutman; longtime adviser Richard Sugarman; and Brad Deutsch, legal counsel to Sanders' 2016 and 2020 presidential campaigns and also counsel to Our Revolution.⁵³ Our

⁵² Amy Goodman, “‘Our Revolution’? Bernie Sanders Launches New Organization, But Key Staffers Quit in Protest,” DEMOCRACY NOW, Aug. 25, 2016, https://www.democracynow.org/2016/8/25/our_revolution_berniesanders_launches_new; David Weigel and John Wagner, Bernie Sanders launches ‘Our Revolution’ with electoral targets – and a few critics left behind,” WASHINGTON POST, Aug. 24, 2016, <https://www.washingtonpost.com/news/post-politics/wp/2016/08/24/bernie-sanders-launches-our-revolution-with-electoral-targets-and-a-few-critics-left-behind/>.

⁵³ Jasper Craven, “Sanders' kickoff of nonprofit answers some questions, raises others,” BRATTLEBORO REFORMER, Aug. 29, 2016, <https://www.reformer.com/stories/sanders-kickoff-of-nonprofit-answers-some-questions-raises-others,144103>; see also Brad C. Deutsch, Overview, <https://www.foster.com/people-brad-deutsch> (“Brad

Revolution was led from its creation until June 2017 by Sanders' 2016 presidential campaign manager Jeff Weaver.⁵⁴ In June 2017, Nina Turner, who had been serving on Our Revolution's board of directors,⁵⁵ replaced Weaver as Our Revolution's president.⁵⁶ Then on February 21, 2019, two days after Sanders announced his 2020 presidential campaign, Turner announced "she would take a leave of absence from her position as president of Our Revolution to serve as co-chair of Vermont Sen. Bernie Sanders' 2020 presidential campaign."⁵⁷ Notwithstanding her position leading Sanders' 2020 campaign, Turner continued serving on Our Revolution's board of directors at least until November 2019.⁵⁸

75. Based on published reports, there is reason to believe that Our Revolution and Senator Sanders have had "common or overlapping officers or employees" and "members, officers, or employees ... that indicate[] a formal or ongoing relationship between [Sanders and Our Revolution] that indicates the creation of a successor entity."

currently serves as General Counsel to Bernie 2020") (visited Jan. 17, 2020); see also Need to Impeach, "Need To Impeach Announces Bernie Sanders' Lawyer Is Joining Effort," Nov. 3, 2017, <https://www.needtoimpeach.com/press-releases/sanders-lawyer-joins-need-to-impeach/> ("Deutsch previously served as General Counsel to Bernie 2016, the presidential campaign of Senator Bernie Sanders and currently serves as General Counsel to the social welfare organization Our Revolution").

⁵⁴ David Weigel and John Wagner, Bernie Sanders launches 'Our Revolution' with electoral targets – and a few critics left behind," WASHINGTON POST, Aug. 24, 2016, <https://www.washingtonpost.com/news/post-politics/wp/2016/08/24/bernie-sanders-launches-our-revolution-with-electoral-targets-and-a-few-critics-left-behind/>.

⁵⁵ Our Revolution, "Founding Statement of Our Revolution Board of Directors," Jan. 11, 2017, <https://ourrevolution.com/press/founding-statement-of-our-revolution-board/> and in APPENDIX.

⁵⁶ Our Revolution, "Our Revolution Board Announces New President," June 29, 2017, <https://ourrevolution.com/press/our-revolution-board-announces-new-president/> and in APPENDIX.

⁵⁷ Seth A. Richardson, "Former Ohio Sen. Nina Turner to serve as co-chair of Bernie Sanders campaign," CLEVELAND.COM, Feb. 21, 2019, <https://www.cleveland.com/politics/2019/02/former-ohio-sen-nina-turner-to-serve-as-co-chair-of-bernie-sanders-campaign.html>.

⁵⁸ Our Revolution, "Our Board," Web Archive Capture Nov. 7, 2019, <https://web.archive.org/web/20191107053752/https://ourrevolution.com/about/>.

76. Based on published reports, there is reason to believe that Our Revolution was directly or indirectly established by Senator Sanders, has not severed “all material connections between” Sanders and Our Revolution for two years pursuant to the factors set forth at 11 C.F.R. § 300.2(c)(2), and has neither sought nor received such a determination of severed ties from the Commission pursuant to 11 C.F.R. § 300.2(c)(4)(ii).
77. Consequently, Our Revolution is subject to the “soft money” provisions of 52 U.S.C. § 30125(e), including a prohibition on solicitation or receipt of funds in connection with an election for Federal office unless the funds are subject to the limitations, prohibitions, and reporting requirements” of FECA. 52 U.S.C. § 30125(e)(1)(A).
78. Under 52 U.S.C. §§ 30125(e)(1), 30116(a)(1)(C), 30118, 30119 and 30121, Our Revolution may solicit or receive only “up to a total of \$5,000 per calendar year from any particular permissible source”—*i.e.*, no corporation funds, no labor organization funds, no government contractor funds, no foreign national funds. Ad. Op. 2003-12 at 8; see *also* Ad. Op. 2003-12 at 12.
79. Our Revolution has paid to disseminate on both Facebook and Instagram ads expressly advocating Sanders’ election in the 2020 presidential race and soliciting contributions for Our Revolution to support this work.⁵⁹ Such ads constitute solicitations in connection with an election for federal office.

⁵⁹ Facebook Ad Library, Our Revolution, visited Jan. 16, 2020, https://www.facebook.com/ads/library/?active_status=all&ad_type=all&country=US&impression_search_field=has_impressions_lifetime&view_all_page_id=1194419550610259.

80. Our Revolution has disseminated email to its supporters stating the organization's goal of mobilizing voters to elect Sanders in the 2020 presidential election and soliciting contributions for this purpose.⁶⁰ Such communications constitute solicitations in connection with an election for federal office.
81. Our Revolution has not limited its solicitations of contributions to \$5,000 per donor per year and has not foreclosed in its solicitations corporation, labor organization, federal government contractor or foreign national contributions and explicitly permits contribution of funds from an "authorizing corporation" on its ActBlue contribution processing page.⁶¹
82. Our Revolution has received at least 19 contributions exceeding \$5,000, including contributions of \$300,000 (2016), \$100,000 (2017), \$195,000 (2018) and \$218,309 (2018).⁶²
83. Our Revolution has not filed reports with the Commission disclosing the funds it has received.
84. Based on published reports, there is reason to believe that Our Revolution, an entity established by Senator Sanders, has solicited and received funds in connection with an election for federal office not subject to the limitations, prohibitions, and reporting requirements of FECA in violation of 52 U.S.C. §§ 30125(e)(1), 30116(a)(1)(C), 30104 and possibly 30118, 30119 and 30121.

⁶⁰ Our Revolution Email, "Subject: the reign of centrism in the Democratic party is over," Jan. 6, 2020, <https://politicalemails.org/messages/88636>.

⁶¹ Our Revolution Donate Page, <https://secure.actblue.com/contribute/page/ourrevolution>.

⁶² Our Revolution, IRS Form 990 Return of Organization Exempt From Income Tax for 2016, Apr. 27, 2018 (Public Inspection Copy); Our Revolution, IRS Form 990 Return of Organization Exempt From Income Tax for 2017, Nov. 16, 2018 (Public Inspection Copy); Our Revolution, IRS Form 990 Return of Organization Exempt From Income Tax for 2018, Nov. 14, 2019 (Public Inspection Copy).

COUNT TWO

Reason to believe that Our Revolution was established by Senator Bernie Sanders and has spent funds in connection with an election for federal office not subject to the limitations, prohibitions and reporting requirements of FECA in violation of 52 U.S.C. §§ 30125(e) and 30104.

85. Paragraphs 1 through 84 are incorporated herein.
86. As an entity established by Senator Sanders, Our Revolution is prohibited from spending funds “in connection with an election for Federal office, including funds for any Federal election activity, unless the funds are subject to the limitations, prohibitions, and reporting requirements” of FECA. 52 U.S.C. § 30125(e)(1)(A).
87. FECA defines “Federal election activity” to include voter registration activity within 120 days of a federal election, voter identification and get-out-the-vote activity conducted in connection with a federal election, and public communication that refers to a clearly identified federal candidate and that promotes or supports a candidate for that office (regardless of whether the communication expressly advocates a vote for or against a candidate). 52 U.S.C. § 30101(20)(A).
88. On November 4, 2016, Our Revolution made \$240,000 in expenditures supporting federal election candidates Russ Feingold and Deborah Ross.⁶³
89. In 2018, Our Revolution was “part of a national coalition” supporting Florida gubernatorial candidate Andrew Gillum’s campaign that “spent \$3.5 million on door-to-door canvasses,

⁶³ Our Revolution, FEC Form 5 “Report of Independent Expenditures Made and Contributions Received,” Nov. 5, 2016, <https://docquery.fec.gov/pdf/341/201611079037128341/201611079037128341.pdf>.

phone-banks, texting, mail, digital, and radio and TV ads, to activate voters[.]”⁶⁴ Because U.S. Senate and House candidates were on the same August 2018 ballot with Gillum,⁶⁵ funds spent by Our Revolution to identify and turn out voters constituted “Federal election activity” under 52 U.S.C. § 30101(20)(A).

90. Facebook’s Ad Library indicates that Our Revolution has spent more than \$14,000 to promote advertisements on both Facebook and Instagram,⁶⁶ many of which clearly identify Senator Sanders as a 2020 presidential election candidate and expressly advocate his election to office or, at a minimum, constitute public communication that promotes or supports Sanders for the office of president, meeting the definition of “Federal election activity” at 52 U.S.C. § 30101(20)(A)(iii). See also 11 C.F.R. § 100.26 (defining “public communication”).
91. Our Revolution has publicly stated it is presently working hard to identify and turn out voters to caucus for Senator Sanders at Iowa’s February 3, 2020 Democratic caucuses. In the words of Our Revolution’s board chair Larry Cohen, Our Revolution is “building a grassroots movement to get Bernie elected as president and that begins with the Iowa caucus[.]”⁶⁷ Our Revolution’s

⁶⁴ Our Revolution, “Our Revolution Celebrates Andrew Gillum’s Historic Primary Victory,” Aug. 28, 2018, <https://ourrevolution.com/press/our-revolution-celebrates-andrew-gillums-historic-primary-victory/> and in APPENDIX.

⁶⁵ “Florida Primary Election Results,” New York Times, Aug. 30, 2018, <https://www.nytimes.com/interactive/2018/08/28/us/elections/florida-primary-elections.html>.

⁶⁶ Facebook Ad Library, Our Revolution, visited Jan. 16, 2020, https://www.facebook.com/ads/library/?active_status=all&ad_type=all&country=US&impression_search_field=has_impressions_lifetime&view_all_page_id=1194419550610259.

⁶⁷ Thomas Geyer, “Bernie organizations urge unions to help flip eastern Iowa counties that voted for Trump,” QUAD-CITY TIMES, Dec. 18, 2019, https://qctimes.com/news/local/bernie-organizations-urge-unions-to-help-flip-eastern-iowa-counties/article_be4156d1-21fa-5159-bf25-e2dd1eb407fc.html

“goal is not just to mobilize ... voters for the caucuses, but also to sustain their involvement in support of the Democratic nominee through November and beyond.”⁶⁸ Any funds disbursed by Our Revolution in support of this work (e.g., staff salaries, travel and subsistence expenses, materials costs, etc.) constitutes “Federal election activity” under FECA—e.g., voter registration activity (“[a]ny ... activity that assists potential voters to register to vote”), get-out-the-vote activity (“[e]ncouraging or urging potential voters to vote” or “activity that assists potential voters to vote”) and voter identification (“acquiring information about potential voters, including ... creating or enhancing voter lists by verifying or adding information about the voters’ likelihood of voting in an upcoming election or their likelihood of voting for specific candidates”). 11 C.F.R. § 100.24.

92. Based on published reports, there is reason to believe that Our Revolution, an entity established by Senator Sanders, has spent funds in connection with elections for federal office, including funds for Federal election activity, not subject to the limitations, prohibitions, and reporting requirements of FECA in violation of 52 U.S.C. §§ 30125(e)(1)(A) and 30104.

PRAYER FOR RELIEF

93. Wherefore, the Commission should find reason to believe that Our Revolution violated 52 U.S.C. § 30101, *et seq.*, and conduct an immediate investigation under 52 U.S.C. § 30109(a)(2). Further, the Commission should determine and impose appropriate sanctions for any and all violations, should enjoin respondent from any and all violations in the future, and should

⁶⁸ Our Revolution Email, “Subject: the reign of centrism in the Democratic party is over,” Jan. 6, 2020, <https://politicalemails.org/messages/88636>.

impose such additional remedies as are necessary and appropriate to ensure compliance with
the FECA.

January 22, 2020

Respectfully submitted,



Common Cause, by
Paul S. Ryan
805 Fifteenth Street, NW, Suite 800
Washington, DC 20005
(202) 833-1200



Paul S. Ryan
805 Fifteenth Street, NW, Suite 800
Washington, DC 20005
(202) 833-1200

VERIFICATION

The complainants listed below hereby verify that the statements made in the attached Complaint are, upon their information and belief, true. Sworn pursuant to 18 U.S.C. § 1001.

For Complainants Common Cause and Paul S. Ryan



Paul S. Ryan

Sworn to and subscribed before me this 22nd day of January 2020.



Notary Public



APPENDIX

PRESS RELEASE

Our Revolution Board Announces New President

29th June, 2017

A Message from New President Nina Turner



WASHINGTON-- The Our Revolution Board of Directors is excited to announce the appointment of a new president. Our Revolution is dedicated to the mission and founding principles of the political revolution started by Senator Bernie Sanders 2016 presidential campaign. Nina Turner, the former Ohio State Senator and Our Revolution Board Member, is set to take the helm and lead the organization to the next phase of success and growth. Since 2016, Our Revolution has expanded to hundreds of local groups that are building a national progressive movement through grassroots organizing, electing progressive candidates and passing ballot initiatives.

Outgoing President Jeff Weaver provided leadership during the infancy stages immediately following the Bernie Sanders 2016 presidential bid in an effort to capture and expand the momentum nationwide.

"We appreciate Jeff's hard work, vision and leadership both on the campaign and as we launched Our Revolution," said **Larry Cohen, Our Revolution Board Chair**. "We are thankful for the work Jeff has done and look forward to his next project. We're thrilled that our Board Member and progressive champion Nina Turner will be our new president. Nina is a well known and inspiring voice in the progressive movement and we look forward to her bringing that energy into her new role."

"It has been extremely satisfying to see Our Revolution grow into the effective progressive grassroots organization it has become," said **former President Jeff Weaver**. "From chapters springing up nationwide to incredible successes moving the nation forward -- particularly in helping to elect local and state legislative candidates, reforming the Democratic Party and in resisting the disastrous Trump agenda, I'm proud of the work we have accomplished together. I know that under Senator Turner's leadership, Our Revolution will have even more success in the future. And I look forward to working with her and the Our Revolution team to create an America that's great for everyone."

"I am grateful to Jeff Weaver for his leadership and I look forward to continuing to work with him, the Board, staff and affiliates in order to move our country forward by advancing a progressive agenda that lifts all Americans," added **Our Revolution President and former Ohio State Senator Nina Turner**.

Offering a powerful narrative of overcoming adversity, Senator Turner is a captivating orator who puts political and social trends into an unparalleled perspective. Most recently a progressive leader and minority whip in the Ohio Senate, she is a college professor, motivational speaker, frequent media commentator, and author.

Senator Turner has worked in leadership at the Ohio Democratic Party and as an elected member of the Cleveland City Council - both opportunities that demonstrated her ability to unify opposing ideologies in critical circumstances. Turner is also a highly sought after public speaker who has traveled across North America to inspire action and instill hope in crowds of more than 20,000 for bold causes like labor, women's reproductive health, voting rights, and income inequality. Her gifted speech-making and commitment to progressive ideals led her to be the Democratic candidate for Ohio's Secretary of State in 2014 and more recently a national surrogate for Senator Bernie Sanders during the tumultuous 2016 Democratic presidential primary.

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PRESS RELEASE

Founding Statement of Our Revolution Board of Directors

11th January, 2017

WASHINGTON -- *Our Revolution on Wednesday released the following "founding statement," adopted unanimously by all 11 board members:*

We are all honored to be members of the Board of Directors of Our Revolution, inspired by Bernie Sanders and his historic presidential campaign. The campaign was always about the movement we were building, as well as supporting a truly amazing candidate.

We are all volunteers in Our Revolution, as we were in the campaign, and we are honored to be on the front lines with tens of thousands of volunteers and millions of supporters. The launch of Our Revolution was viewed by more than 400,000 of us, including more than 60,000 who attended the 2,600 events.

We are committed to the following:

1. **Great groups** – We pledge to support the diversity of the groups and networks that made Bernie 2016 unique. We will not all agree on everything, but we will work towards unity on many things.
2. **Great causes** – We will support movements organizing around the critical issues facing us. Sometimes these issue campaigns will stretch out for months or years, like the campaign to stop the Trans-Pacific Partnership. But we are also prepared to seize the moment, supporting campaigns like the fight against the Dakota Access Bakken pipeline in North Dakota and Iowa.
3. **Great candidates and ballot measures** – We will endorse candidates in primaries and general elections. We will back ballot measures that help create a 21st century democracy and help get big money out of politics, as well as other issues that promote racial, environmental and economic justice.

We are all committed to Bernie's bold progressive agenda. We are committed to conducting state-based outreach and political strategies. We are committed to leadership diversity, not only for this board, but in our staffing and leadership at all levels. We are committed to democratic decision-making, transparency, political independence and small-dollar fundraising.

Full board list below:

- Nina Turner - Fmr. Ohio State Senator

- Deborah Parker - Native American Leader
- Ben Jealous - Civil Rights Leader
- Jim Hightower - Political Leader, National Radio Commentator & Writer
- Jim Zogby - Arab American Human Rights Leader
- Huck Gutman - Former Chief of Staff for Senator Bernie Sanders
- Jane Kleebe - Environmental and Rural Leader
- Lucy Flores - Fmr. Nevada Assemblywoman
- Larry Cohen - Labor
- Catalina Velasquez - Immigration, Reproductive Justice and Trans Queer Liberation Leader
- Shailene Woodley - Actress and Environmental Leader

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NEWS

Bernie Sanders-Inspired Group Celebrates 2-Year Anniversary and Boasts a Near 50 Percent Win Rate for Endorsed Candidates

22nd August, 2018

WASHINGTON – Our Revolution, the political entity founded by Sen. Bernie Sanders today announced unprecedented growth during the organization’s first 24 months of existence. Click here (<https://ourrevolution.com/year-two>) for statistics on Our Revolution's second year. Of the 153 races so far this year 74 candidates won their primaries. Our Revolution local groups are also growing in communities with over 600 local groups in 49 states and nine countries.

“Since our inception, Our Revolution staff and local groups have supported a new generation of progressive leaders, and empowered leaders in communities all over the world to fight for progressive change,” said **Our Revolution President Nina Turner**. “To ensure that the American political and economic systems are responsive to working families, we have recruited and partnered with countless individuals to either run for elected office or push elected officials to put the interests of working families first.”

In a pre-election media conference call held Aug. 22, the organization highlighted its victories and discussed its newly-created political action committee before pivoting to discuss electoral plans for the upcoming midterms.

“From Cynthia Nixon and Alexandria Ocasio-Cortez in New York to Ilhan Omar in Minnesota and Rashida Harbi Tlaib in Michigan, Our Revolution-endorsed candidates are proving that being a nontraditional candidate is not a liability in electoral politics,” **Turner** added. “Our endorsed candidates are often female, running for office for the first time, people of color or religious minorities. They are demonstrating that campaigning on the issues that matter most to voters is indeed a winning strategy.”

To receive an endorsement from Our Revolution, candidates must take four steps:

Step 1: Request and receive the endorsement of a local Our Revolution group

Step 2: The OR local group begins the national endorsement process

Step 3: Candidates seeking the national endorsement complete an endorsement questionnaire

Step 4: The national OR launches internal process to make endorsement decisions

“Our Revolution has a long-term strategy to build a progressive movement,” said **Our Revolution board member Jane Kleeb and Chair of the Nebraska Democratic Party**. “Our recent victories are in states that are too easily written off by the political establishment. Candidates like James Thompson in Kansas, Stacey Abrams, Khalid Kamau, Shelly Hutchinson, Sheikh Raman and Lisa Ring in Georgia, Paulette Jordan in Idaho, these are all candidates who spoke directly to the needs of working families in their communities, candidates who ran on platforms that would substantially improve the lives of everyday people, and they won. Our ideas can anywhere, and that’s why our local groups are organizing all across the country.”

For more information, please contact press@ourrevolution.com
(<mailto:press@ourrevolution.com>).

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NEWS

Our Revolution Celebrates Andrew Gillum's Historic Primary Victory

28th August, 2018

WASHINGTON - Our Revolution on Tuesday celebrated the historic victory of Andrew Gillum in the primary for Governor of Florida.

Our Revolution was part of a national coalition supporting Gillum's progressive campaign. Nearly a dozen groups spent \$3.5 million on door-to-door canvasses, phone-banks, texting, mail, digital, and radio and TV ads, to activate voters who may not have participated in past primary elections, including young voters, Black voters, Latino voters and the growing community of Puerto Rican voters. Gillum's support from grassroots activists and organizations was in staunch contrast to the crowded field of wealthy, establishment-funded candidates.

"Andrew Gillum's historic victory tonight is proof that when progressive candidates run on their values and the grassroots organize, we can win change for the people," said **Our Revolution President Nina Turner**. "Gillum's people-powered campaign defeated corporate interests. Andrew is running for the working men and women, not big businesses or special interest groups. From Medicare for All to protecting our environment, Andrew Gillum will continue to fight alongside working people and we look forward to continuing to support his campaign in the general election."

Our Revolution also endorsed business owner and non-profit founder Sanjay Patel in Florida's 8th Congressional District and educator Alex Heeren in State House District 66. Both candidates were unopposed and will advance to the general election in November.

Our Revolution supports progressive champions at every level of government. By supporting candidates backed by people, not corporations, we are aiming to transform American politics to make our political and economic systems responsive to the needs of working families.

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NEWS

Political Revolution Picks Up Momentum in 2018 Midterm Elections

8th November, 2018

WASHINGTON—Just two years into the organization’s history, Our Revolution and its local groups continued to build a track record of electoral victories. The group’s endorsed candidates won races at every level of government and from coast-to-coast in Tuesday’s midterm elections. From school board, to state legislatures, to Congress, Our Revolution candidates won big and did so while being among the most diverse and most progressive in the field. A full list of our 2018 election results can be found here (<https://ourrevolution.com/results/>).

“The 2018 midterm elections proved what is possible when candidates run on progressive values and refuse to accept the status quo or buckle under the weight of convention,” said **Our Revolution President Nina Turner**. “Thanks to the work of our local groups and volunteers, we made history by electing Rashida Talib, Ilhan Omar, Deb Haaland, and Alexandria Ocasio-Cortez to the U.S. House of Representatives. Our endorsed candidates were successful in races from the school board to Congress by boldly proclaiming progressive values such as universal healthcare, affordable housing, tuition-free higher education, paid sick leave and increasing the minimum wage.”

“We proved that there is demand for candidates who boldly stand for progressive values,” **Turner** continued. “We also proved what is possible when local groups stick to progressive values, identify progressive champions and advocate for an America that works for all.”

Our Revolution won over 70 races endorsed this cycle including:

- Rashida Talib, U.S. Congress (MI-13)
- Ilhan Omar, U.S. Congress (MN-5)
- Deb Haaland U.S. Congress, (NM-1)
- Alexandria Ocasio-Cortez, (NY-14)
- Keith Ellison, Minnesota Attorney General
- Summer Lee, Pennsylvania House, District 34
- Sara Innamorato, Pennsylvania House, District 21
- Florida Amendment 4, YES on Second Chances
- Massachusetts Question 2, Reforming campaign finance law

- Massachusetts Question 3, Protecting transgender people from discrimination

A full list of our 2018 election results can be found here (<https://ourrevolution.com/results/>).

Our Revolution supports progressive champions at every level of government. By supporting candidates backed by people, not corporations, we are aiming to transform American politics to make our political and economic systems responsive to the needs of working families. With this election, we are one step closer to accomplishing that goal.

In the November 6, 2018, Midterm Election, Our Revolution endorsed:

196 candidates in **44** states including:

- 101 women candidates
- 62 African, African-American, Latinx, and Asian American candidates
- 17 military veterans
- 8 openly LGBTQ candidates

41 ballot initiatives, including:

- Florida's Yes on Second Chances
- Massachusetts' Yes on 3 for Transgender Protection
- Yes on Fair Maps Colorado Amendments Y and Z
- Louisiana's Yes on Amendment 2, Unanimous Jury Verdict for Felony Trails Amendment
- Michigan's Yes on Proposal 1, Marijuana Legalization

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NEWS

Our Revolution Celebrates Sen. Sanders' Decision to Run for President

19th February, 2019

WASHINGTON -- Our Revolution on Tuesday celebrated Sen. Bernie Sanders' announcement that he will seek the Democratic nomination for president in 2020. Since January, Our Revolution and progressive organizations across the progressive spectrum came together to host hundreds of live stream house parties and community barnstorms organizing people to encourage Sen. Sanders to run.

"Time and time again, Sen. Sanders has shown up for working people of all backgrounds who have been left behind by those at the very top," said **Our Revolution President, Nina Turner**. "For over three decades he has championed issues like Medicare for All, combating climate change, and increasing the minimum wage. There is no other elected official that has so consistently answered the call to serve everyday people than Sen. Bernie Sanders."

With over 600 local groups in all 50 states and nine countries, Our Revolution is uniquely prepared to mobilize voters across the country and abroad to support Sen. Sanders in the Democratic primary.

"For the past two and a half years, Our Revolution local groups have been organizing in their communities, building power, achieving victories, and hoping for this announcement," said **Our Revolution Chair of the Board, Larry Cohen**. "The coalitions they've entered into and relationships they've built have placed them in a unique position to organize across the progressive movement to build an active and engaged grassroots network. Now is the time for us to draw on these connections, rallying behind Sen. Sanders as he runs for the Democratic nomination."

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