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September 14, 2020

Federal Election Commission
Office of Complaints Examination and Legal Administration
Attn: Christal Dennis, Paralegal
1050 First Street, NE
Washington, D.C. 20463

Re: MUR 7781

Ms. Dennis:

The undersigned serves as counsel to Fight for the American Dream PAC (“FFAD”), an independent expenditure-only committee registered with the Federal Election Commission (the “Commission”), ID C00746297. This letter responds on behalf of FFAD to the Commission’s notification of a complaint from the Foundation for Accountability and Civic Trust (the “Complaint”) alleging that FFAD violated the Federal Election Campaign Act (the “Act”) and Commission regulations.

As described below, the allegations made in the Complaint do not give rise to a violation of the Act that the Commission should pursue. The Complaint makes one core allegation regarding digital advertisements disseminated by FFAD – that it “coordinated” (as defined in Commission rules and precedent) the advertisements with House of Representatives candidate Mondaire Jones and his campaign committee, Mondaire for Congress (collectively “Jones”).¹

¹ The Complaint presents multiple secondary accusations that are in no way violations of the Act, specifically that:

1. FFAD used “money that appears to have been raised for the super PAC with the campaign's assistance.” This is not a violation of the Act. See Federal Election Commission, Advisory Opinion 2011-12 (Majority PAC and House Majority PAC), available at <https://www.fec.gov/files/legal/aos/2011-12/AO-2011-12.pdf>; Advisory Opinion 2007-05 (Iverson), at <https://www.fec.gov/files/legal/aos/2007-05/2007-05.pdf> (last accessed September 10, 2020). See also 52 U.S.C. § 30125(e)(1).
2. FFAD “direct[ed] ad viewers to the Jones' campaign website.” FFAD flatly denies that this is a violation. Linking to a candidate’s website in no way indicates coordination, nor collaboration, an in-kind contribution, or the like.

FFAD disseminated digital advertisements centered around two videos: “Bio” and “Endorsements.” *Each video has two versions, as once FFAD discovered the amount of campaign footage integrated into each of the first versions (“Bio 1” at 100% campaign-sourced footage and “Endorsements 1” at 53%, they quickly re-edited and disseminated new versions* (collectively, the “Advertisements”).

The re-edited versions began on or after June 18th, 2020. *This change was made months before the Complaint was publicly reported, with the Complaint being filed almost two months after the June 23, 2020 New York primary election.* The new versions of these videos contain an amount of Jones campaign footage completely in-line with Commission precedent.²

It is important to note at the outset that the Complaint conveniently inflates and conflates the amount of spending that FFAD spent on the Advertisements. The Advertisements only made up roughly half of FFAD’s total independent spending in support of Jones – \$74,173.57 was spent on direct mail, leaving \$86,000 spent on the Advertisements, half of what the Complaint claims.³

On information and belief, of this \$86,000 only \$62,912.43 was spent on the Advertisements in total (the remainder is fees to FFAD’s digital consultant). Of this amount, *only \$7,762.90 was spent on “Bio 1” and “Endorsements 1”, with \$55,149.53 being spent on “Bio 2” and “Endorsements 2”.*⁴

As such, this response will only analyze the Complaint in reference to “Bio 2” and “Endorsements 2”, as *88% of the funds spent on the Advertisements were for these versions.* FFAD quickly caught and corrected any potential issues.

The Complaint argues that FFAD “republished” Jones’ campaign materials. While FFAD did utilize photos from Jones’ website and YouTube page, they only did so to augment its own message. *Most importantly, FFAD did not communicate with Jones in any way regarding any of the Advertisements.*

Given that FFAD discovered and rectified any potential issues with usage of campaign materials in “Bio 1” and “Endorsements 1”, the Commission should find no reason to believe that FFAD committed a violation, and should close the file. At most, we request that the Commission provide a warning to the committee, since it proactively discovered a potential error in compliance, and fixed that error quickly.

² Full Source Sheets and links to the Advertisements can be found in Attachment A.

³ FFAD, Forms 24: June 19, at <https://docquery.fec.gov/cgi-bin/forms/C00746297/1413284/se>; June 16, at <https://docquery.fec.gov/cgi-bin/forms/C00746297/1412106/>; June 12, at <https://docquery.fec.gov/cgi-bin/forms/C00746297/1411562/>; June 12, at <https://docquery.fec.gov/cgi-bin/forms/C00746297/1411498/> (last accessed September 10, 2020).

⁴ See Attachment 2, spending breakdown from FFAD’s digital consultant.

1. The Advertisements do not meet the criteria for a “coordinated communication” under 11 C.F.R. § 109.21.

a. “Coordinated Communications”

Under the FEC’s rules, a “coordinated communication” and an in-kind contribution results when a communication meets *all of the following criteria*:

- I. *[Public Communication]* the communication is a “public communication” – a paid medium;⁵
- II. *[Third Party]* the communication is paid for by a third party (other than that candidate or party);
- III. *[Content Standard]* it contains certain content;
- IV. *[Conduct Standard]* was produced as a result of certain conduct; and
- V. *[Safe Harbor]* is not protected by a safe harbor, such as a firewall.⁶

The Advertisements are “public communications,” as they were disseminated for a fee on digital platforms. FFAD is “a person other than that candidate, authorized committee, or political party committee” under 11 C.F.R. § 109.21(a)(1).

While each of the Advertisements *do* meet the FEC’s content standard, *the conduct standard is not met*, as FFAD did not coordinate its Advertisements with Jones in any way.

b. Analysis of Content Standard

i. Overview

Under the FEC’s rules, only certain communications can be considered coordinated:

⁵ 52 U.S.C. § 30101(22); 11 C.F.R. §§ 100.26 (definition of “public communication”, spacing added), 100.27 (definition of “mass mailing”), 100.28 (definition of “telephone bank”).

⁶ See 11 C.F.R. §§ 109.20-23.

- a) **[Electioneering Communications]** television, satellite, or radio advertisements that mention a clearly identified candidate within 30 days of a primary or 60 days of a general election;⁷
- b) **[Reference Test]** Public Communications that reference candidates or parties – for House or Senate, within 90 days of their primary or general election, or nominating convention or caucus.⁸
- c) **[Express Advocacy]** Public Communications that contain express advocacy, or the functional equivalent of express advocacy for a candidate **at any time**;⁹ or
- d) **[Republication of Candidate Materials]** Public Communications that disseminate, or republish campaign materials prepared by a candidate.¹⁰

While all of the Advertisements are express advocacy for Jones' election, this response will focus on the republication of candidate materials, which is the focus of the Complaint.

ii. Republication of Candidate Materials

Neither “Bio 2” nor “Endorsements 2” “republishes” campaign materials “prepared by a candidate or [a] candidate’s authorized committee” within the meaning of 11 C.F.R. § 109.21(c)(2). While the second versions of the advertisements make use of photos and video publicly posted on Jones’ website and YouTube page, the portion of materials used is not sufficient to fall within the scope of section 109.21(c)(2).

Recent enforcement actions indicate that the Commission permits an independent communication to use a certain amount of materials obtained from campaign sources – the Complaint’s position that **any** republication of candidate materials is a violation simply does not hold water, and ignores decades of Commission precedent.¹¹ In fact, we are unaware of any Commissioner taking this position in the Commission’s recent history.

⁷ 11 C.F.R. § 100.29 (definition of “electioneering communication”)

⁸ 11 C.F.R. § 109.21(c)(4).

⁹ 11 C.F.R. § 109.21(c)(3), (c)(5).

¹⁰ 11 C.F.R. § 109.21(c).

¹¹ See 52 U.S.C. § 30116(a)(7)(B)(iii); 11 C.F.R. § 109.23;

See also, e.g., Federal Election Commission Matters Under Review:

While the Commission has never specified a particular percentage of a communication that can consist of “materials prepared by” a candidate or their campaign, Commission precedent indicates that an independent communication may, at a minimum, utilize approximately 50% of its imagery from sources that would be defined as “campaign materials.”

Both “Bio 2” and “Endorsements” 2 utilize Jones campaign footage for roughly 47% of its communication.¹² While the Advertisements *do* make use of photos that Jones’ 2020 House campaign had publicly disseminated, FFAD only did so to augment their own messages regarding Jones’ effectiveness as a potential legislator and endorsements he had received, as described below.

As former Commissioners Petersen and Goodman (as well as Commissioner Hunter) stated in their Statement of Reasons in MURs 6603, 6777, 6801, 6870 and 6902:

*“republication requires more than respondents creating and paying for advertisements that incorporate as background footage brief segments of video footage posted on publicly accessible websites by authorized committees of federal candidates.”*¹³

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- 6902 (Al Franken for Senate 2014) (FEC did not find reason to believe on an independent communication that utilized ***similar themes and branding*** as a campaign advertisements), Certification (November 9, 2015), available at <https://www.fec.gov/files/legal/murs/6902/15044382611.pdf>, Statement of Reasons of Republican Commissioners Petersen, Hunter, and Goodman in MURs 6603, 6777, 6801, 6870, 6902 (December 17, 2015), at <https://www.fec.gov/files/legal/murs/6902/15044382837.pdf>;
 - 6801 (Senate Majority PAC) (FEC did not find reason to believe on a communication using ***16 seconds of campaign materials in a 30-second advertisement***), Certification (November 19, 2015) at <https://www.fec.gov/files/legal/murs/6801/15044382446.pdf>, First General Counsel’s Report (October 31, 2014) at <https://www.fec.gov/files/legal/murs/6801/15044382435.pdf>;
 - 6603 (Ben Chandler for Congress) (FEC did not find reason to believe on a communication using ***13 seconds of campaign materials in a 30-second advertisement***), Certification (November 19, 2015) at <https://www.fec.gov/files/legal/murs/6603/15044382398.pdf>, First General Counsel’s Report (August 22, 2014), at <https://www.fec.gov/files/legal/murs/6603/15044382376.pdf>;
 - 7185 (Sheriff Scott Jones for Congress) (FEC did not find reason to believe on a communication using ***16 or 17 seconds of campaign materials in a 30-second advertisement***), Certification (October 20, 2017), at <https://www.fec.gov/files/legal/murs/7185/17044431573.pdf>; First General Counsel’s Report (August 7, 2017), at <https://www.fec.gov/files/legal/murs/7185/17044431550.pdf> (last accessed September 10, 2020).

¹² Attachment A.

¹³ FEC MURs 6603 (Ben Chandler for Congress), 6777 (Kirkpatrick for Arizona), 6801 (Senate Majority PAC), 6870 (American Crossroads), 6902 (Al Franken for Senate 2014), Statement of Reasons of Commissioners Petersen, Hunter, Goodman (December 17, 2015), at <https://www.fec.gov/files/legal/murs/6870/15044382832.pdf> (last accessed September 10, 2020).

An earlier Statement of Reasons by former Commissioners McGahn and Petersen (as well as Commissioner Hunter) stated that “republishing” does not occur when a third-party “adds its own text, graphics, audio, and narration to create its own message. In other words, the . . . advertisement – neither in whole nor in substantial part – is anything close to a carbon copy of the [candidate’s] footage. . . the [independent spender] did not repeat verbatim the [candidate’s] message; rather, it created its own.”¹⁴

Similarly, Commissioner Weintraub and former Commissioner von Spakovsky described the use of public materials in MUR 5743:

“The downloading a photograph from a candidate’s website that is open to the world, for incidental use in a large mailer that is designed, created, and paid for by a political committee as part of an independent expenditure without any coordination with the candidate, does not constitute the ‘dissemination, distribution, or republication of candidate campaign materials.’”¹⁵

In this case, **FFAD did not communicate with Jones in any way regarding the Advertisement – it took public footage, and created its own messages.** Once FFAD discovered the amount of footage from Jones was integrated into “Bio 1” and “Endorsements 1”, the committee made new versions: “Bio 2” utilizing 14 seconds of campaign footage (47%), and “Endorsements 2” with roughly 14 seconds of campaign footage (47%) as well.¹⁶ These incidental uses do not mean that FFAD legally “republished” campaign materials – the committee caught a potential error, and corrected it quickly.

The committee also caught any potential error **before** the Complaint was filed – changing the ads on or around June 18 (before the election), when the Complaint was filed months later on

¹⁴ FEC MUR 6357 (American Crossroads), Statement of Reasons of Commissioners McGahn, Petersen, and Hunter (February 22, 2012), at <https://www.fec.gov/files/legal/murs/6357/12044312281.pdf>; First General Counsel’s Report (August 31, 2011), at <https://www.fec.gov/files/legal/murs/6357/12044312188.pdf>; Certification (3-3 vote, January 26, 2012), at <https://www.fec.gov/files/legal/murs/6357/12044312209.pdf> (last accessed February 27, 2012).

¹⁵ FEC MUR 5743 (Betty Sutton for Congress), Statement of Reasons of Commissioners Weintraub and Spakovsky (January 23, 2007), at <https://www.fec.gov/files/legal/murs/5743/00005AE4.pdf> (last accessed September 10, 2020).

¹⁶ It is important to note that while “Endorsements 1” is in-line with an amount of footage in MUR 6801 (Senate Majority PAC), where the Commission did not find a violation, FFAD edited this communication as well to be more in-line with the other precedent cited above. See FEC MUR 6801 (Senate Majority PAC) (FEC did not find reason to believe on a communication using **16 seconds of campaign materials in a 30-second advertisement**), Certification (November 19, 2015) at <https://www.fec.gov/files/legal/murs/6801/15044382446.pdf>, First General Counsel’s Report (October 31, 2014) at <https://www.fec.gov/files/legal/murs/6801/15044382435.pdf>;

August 17, 2020.¹⁷ While it does not have legal bearing, it is worth noting to the Commission that the Complaint was filed two months after the June 23, 2020 New York primary election.

While the Complaint attempts to cite MUR 6357 (American Crossroads) for its own purposes – it conveniently disregards that the Commission split 3-3 on the MUR – and that the Republican Commissioners in MUR 6357 specifically cite the lack of communication between the campaign and the third-party as crucial to the analysis.¹⁸ This Commission should adopt the previous logic of Commissioners McGahn, Petersen, and Hunter in MUR 6357.

To demonstrate the requisite coordination, the Complaint also seeks to tie the similarities between the Advertisements and Jones’ website, as well as the timing of the posting of Jones’ materials on its YouTube page to its use by FFAD, the FEC’s Office of General Counsel has previously stated that *similarities and timing are irrelevant in the analysis of “republishing”*:

“[T]he alleged similarities of the two communications at issue and their rough temporal proximity do not give rise to a reasonable inference that any of the conduct standards were satisfied under the facts presented here, particularly where no other information indicating that the Respondents engaged in any of the activities outlined in the relevant conduct standards.”¹⁹

The Office of General Counsel’s analysis in MUR 6849 on the subject is also persuasive (of note, the FEC dismissed the allegations in this matter 6-0) – that similarities in theme, promotion, and messaging between candidates and third-parties spending to their benefit *do not in and of themselves give rise to “coordination”*:

Although there are similarities in the themes and words used in the Tiahrt campaign website and the radio advertisement, under the circumstances presented here, such similarity does not on its own sufficiently show that the content of the radio advertisement was coordinated.

Because the information on Tiahrt’s website was publicly available, KRG did not necessarily need to discuss its own advertisement with Tiahrt in order to include

¹⁷ See FACT Complaint Press Release, at <https://www.factdc.org/post/ethics-watchdog-calls-for-an-investigation-into-the-super-pac-fight-for-the-american-dream-pac> (last accessed September 10, 2020).

¹⁸ FEC MUR 6357 (American Crossroads), Statement of Reasons of Commissioners McGahn, Petersen, and Hunter (February 22, 2012) (“Like MUR 5743 (Betty Sutton for Congress) and MUR 5996 (Tim Bee), the video footage of Rob Portman at issue was obtained without direct contact with the campaign; in this case, it was obtained from a publicly available Internet website”), at <https://www.fec.gov/files/legal/murs/6357/12044312281.pdf>; Certification (3-3 vote, January 26, 2012), at <https://www.fec.gov/files/legal/murs/6357/12044312209.pdf> (last accessed September 10, 2020).

¹⁹ FEC MUR 6821 (Shaheen for Senate), First General Counsel’s Report at 8-9 (January 21, 2015), at <https://www.fec.gov/files/legal/murs/6821/15044382919.pdf> (last accessed September 10, 2020).

*similar themes in its own advertisement and thus, absent other information, the similarities alone do not sufficiently establish that the conduct prong is met.*²⁰

In this case, photos and footage of Jones were used to supplement FFAD's communication regarding his effectiveness as a community leader, as incidental background to the core message of the communication. It is "common sense," as Commissioners Mason, Smith, and Toner stated in MUR 5369, that FFAD would anchor its Advertisements on Jones' service to his community and the public in general.

These similarities do not in and of themselves give rise to a finding of "coordination," ***and the Complaint presents no evidence that FFAD coordinated its Advertisements with Jones – likely because it does not exist.*** From this, the FEC should find that FFAD did not "republish" campaign materials "prepared by" Jones.

²⁰ FEC MUR 6849 (Kansans for Tiahrt), First General Counsel's Report at 7-8 (May 13, 2015) at <https://www.fec.gov/files/legal/murs/6849/15044385448.pdf>; Vote (December 23, 2015) at <https://www.fec.gov/files/legal/murs/6849/15044385470.pdf> (last accessed September 10, 2020).

See also, as cited in FEC MUR 6357 (American Crossroads), Statement of Reasons of Commissioners McGahn, Petersen, and Hunter (February 22, 2012), at <https://www.fec.gov/files/legal/murs/6357/12044312281.pdf>.

- MUR 2272 (American Medical Association). Statement of Reasons, Commissioner Josefiak ("the regulations do not convert independent expenditures for those communications into contributions based upon a similarity or even identity of themes within the campaign effort. Ideas and information can come from many sources, and their commonality is of itself insufficient to demonstrate either coordination or copying"), pages 216-240 (June 26, 1987), at <https://www.fec.gov/files/legal/murs/2272.pdf>;
- MUR 2766 (Auto Dealers and Drivers for Free Trade PAC), Statement of Reasons of Commissioner Josefiak ("A generalized observance of 'similarity' in advertising by a candidate's campaign and an independent expenditure effort should not be the starting point for analysis or the primary basis for finding a violation, nor should it solely create an inference of coordination. The practical reality is that an intelligently planned independent expenditure effort will always employ similar themes and issues, or attack the same weaknesses of the opponent, as the campaign of the beneficiary candidate"), pages 243-269 (June 13, 1990), at <https://www.fec.gov/files/legal/murs/2766.pdf>;
- MUR 5369 (Rhode Island Republican Party), Statement for the Record, Commissioners Mason, Smith, and Toner ("[it is] reasonably attributed to the common sense conclusion that most parties and candidates will be addressing a defined set of campaign issues in their advertising. The Commission has no legal basis to assign a legal consequence to these similarities without specific evidence of prior coordination") (August 15, 2003), at <https://www.fec.gov/files/legal/murs/5369/000001A1.pdf> (last accessed September 10, 2020).

c. Analysis of Conduct Standard

While the Advertisements do meet the content standards outlined in 11 C.F.R. § 109.21(c) as they are express advocacy, they ***do not meet the conduct standard. As such, they are not “coordinated communication[s],” nor in-kind contributions.*** In order to find a “coordinated communication,” Jones and FFAD would have been required to engage in certain conduct:

- a) ***[Request or Suggestion]*** Jones would have needed to request or suggest that FFAD engage in a communication meeting the content standards. No such request or suggestion exists.
- b) ***[Material Involvement]*** Jones would have needed to have material involvement in the communication. FFAD created its Advertisements without any involvement whatsoever from Jones. Despite this, there is an exception from this prong if the “information material to the creation, production, or distribution of the communication was obtained from a publicly available source.”
- c) ***[Substantial Discussion]*** Jones and FFAD would have needed to engage in substantial discussions regarding the communication. FFAD created its Advertisements without involvement from Jones. Despite this, there is an exception from this prong if “information material to the creation, production, or distribution of the communication was obtained from a publicly available source.”
- d) ***[Common Vendor and Former Campaign Employees]*** Use of a common vendor between FFAD and Jones working on the communication, or a former employee of Jones worked on FFAD’ communication. The Complaint does not cite to any common vendor between FFAD and Jones.
- e) ***[Republication of Candidate Materials]***, solely based on the conduct standards as above.²¹ As described above, FFAD did not “republish” campaign materials beyond the use of materials supporting the Advertisement’s broader message, without actual coordination with Jones.

Furthermore, FFAD had no involvement whatsoever in the posting of footage by Jones’ campaign onto its YouTube page.

None of these conduct standards are met in this situation – there was simply no coordination nor involvement by Jones in FFAD’ Advertisements.

²¹ 11 C.F.R. § 109.21(d).

FFAD used materials “obtained from a publicly available source” – Jones’ website and YouTube page – to produce its Advertisements, and did not otherwise communicate or “coordinate” its Advertisements with Jones. The Complaint has presented no facts to the contrary, outside of mere speculation. The Complaint has simply failed to state any additional information that would indicate that Jones and FFAD “coordinated” the Advertisements – because it does not exist.

2. The Commission should dismiss the Complaint and close the file.

It has become commonplace for groups disseminating communications to utilize photos and video footage that are made public by candidates on Flickr pages, YouTube videos, and even their own websites and social media accounts.²²

In the area of protected First Amendment speech, the Commission must avoid delineating the narrow lines between permissible and impermissible speech by way of the enforcement process. Thus, to the extent that the Commission determines that a communication’s use of publicly available imagery that is sourced, in part, from online publicly available photographs or footage posted online by a candidate, the Commission must provide guidance through the regulation process that would provide the regulated community with clear guidance on whether and under what circumstances such activity would be deemed to be impermissible.

At this time, those who wish to utilize such materials are at the mercy of both conflicting Commission precedent and no clear guidance as to its use.

As argued above, the Complaint filed in this matter does not provide facts that would lead to a violation of the Act, especially in light of FFAD’s actions to mitigate any *potential* violations. A complaint is required to allege facts that give rise to a violation of the Act or Commission regulations.²³

²² See, e.g., Roll Call, “What is McConnelling? How campaigns skirt coordination laws to help PACs make ads” (June 6, 2019), available at <https://www.rollcall.com/2019/06/06/what-is-mcconnelling-how-campaigns-skirt-coordination-laws-to-help-pacs-make-ads/> (last accessed September 10, 2020).

²³ See FEC MUR 7135 (Donald J. Trump for President, et. al.), Statement of Reasons of Commissions Hunter and Petersen at fn 31 (September 6, 2018, spacing for clarity), citing MURs 6296, 6056, 5467 (“We have on multiple occasions shown that the reason to believe standard found at 52 U.S.C. § 30109(a)(2) means more than merely a reason to suspect.

See, e.g., MUR 6296 (Buck for Colorado), Statement of Reasons of Vice-Chair Caroline C. Hunter and Commissioners Donald F. McGahn and Matthew S. Petersen at 7 (“[T]he Act’s complaint requirements and limits on Commission investigative authority serve no purpose if the Commission proceeds anytime it can imagine a scenario under which a violation may have occurred.”).

MUR 5467 (Michael Moore), First Gen. Counsel’s Rpt. at 5 (“Purely speculative charges, especially when accompanied by a direct refutation, do not form an adequate basis to find reason to believe that a violation of the [Act] has occurred.”); see also FEC v. Machinists Non-Partisan

As the Complaint does not do so – we request that the Commission determine that there is no reason to believe that FFAD committed any violation alleged in the Complaint, and close the file in this matter, or at most provide a warning to FFAD given its efforts to mitigate any potential errors.

Sincerely,



Neil Reiff



David Mitrani

Counsel for Fight for the American Dream PAC

Political League, 655 F.2d 380,388 (D.C. Cir. 1981) ("[M]ere 'official curiosity' will not suffice as the basis for FEC investigations"); id. at 387 (distinguishing the Commission from other administrative agencies that are "vested with broad duties to gather and compile information and to conduct periodic investigations concerning business practices the FEC has no such roving statutory functions"), available at https://eqs.fec.gov/eqsdocsMUR/7135_2.pdf (last accessed September 10, 2020).

Attachment A

Source Sheets for Advertisements

“Bio 1”

Visual	Source	Duration (mm:ss:frames)
"Bio 1"	Frames per second: 24:00	Ad duration: 00:30:00
Mondaire for Congress - Bio (V2)		https://vimeo.com/428586427/9247944614
House with flag	Mondaire Jones	00:00:16
House	Mondaire Jones	00:00:20
Mondaire outside	Mondaire Jones	00:03:09
Black child looking out window	Mondaire Jones	00:02:06
Black mother with child	Mondaire Jones	00:00:18
Black child drawing	Mondaire Jones	00:01:09
Black child drawing face	Mondaire Jones	00:01:06
Mondaire talking at table	Mondaire Jones	00:02:02
Mondaire in classroom	Mondaire Jones	00:02:21
Mondaire listening at table	Mondaire Jones	00:01:11
Mondaire speaking at table	Mondaire Jones	00:02:18
Mondaire talks with older woman	Mondaire Jones	00:01:03
Mondaire shakes hands with cashier	Mondaire Jones	00:01:02
Mondaire chats with customer	Mondaire Jones	00:01:04
Older woman smiles	Mondaire Jones	00:01:14
Mondaire walks outside at water	Mondaire Jones	00:01:13
Mondaire outside stares at water	Mondaire Jones	00:03:20
	Total Mondaire footage used	00:30:00

“Bio 2”

Visual	Source	Duration (mm:ss:frames)
“Bio 2”	Frames per second: 24:00	Ad duration: 00:30:00
Mondaire for Congress - Bio (V3 - Spoken Disclaimer)		https://vimeo.com/428656552/9d33c2aae1
Small town	Pexels.com Stock Footage	00:01:12
Mondaire outside	Mondaire Jones	00:03:09
Black child looking out window	Mondaire Jones	00:02:06
Black child drawing	Pexels.com Stock Footage	00:02:13
US Capitol building	Pexels.com Stock Footage	00:02:13
Flipping through book	Pexels.com Stock Footage	00:03:06
Mondaire listening	Mondaire Jones	00:01:11
Mondaire speaking at table	Mondaire Jones	00:02:18
Mondaire talking to woman	Mondaire Jones	00:01:03
Mondaire shaking hands	Mondaire Jones	00:01:02
Mondaire talks with customer	Mondaire Jones	00:00:22
Woman's eyes	Pexels.com Stock Footage	00:00:07
Girl's eyes	Pexels.com Stock Footage	00:00:08
Man's eyes	Pexels.com Stock Footage	00:00:08
Mondaire outside	Mondaire Jones	00:01:23
Small town	Pexels.com Stock Footage	00:04:07
	Total Mondaire footage used	00:14:22

“Endorsements 1”

Visual	Source	Duration (mm:ss:frames)
Ad #2 "Endorsements"	Frames per second: 24:00	Ad duration: 00:30:00
Mondaire for Congress - Endorsements (V3)		https://vimeo.com/428356396/f85f42b614
Bridge	Mondaire Jones	00:01:06
Titles	Designed in Premiere	00:03:12
Custom graphics	Designed in Premiere	00:08:01
Mondaire outside	Mondaire Jones	00:02:07
Mondaire walking past station	Mondaire Jones	00:03:15
Mondaire shaking hands	Mondaire Jones	00:01:15
Sunlit trees	Mondaire Jones	00:02:21
Custom graphics	Designed in Premiere	00:02:04
Mondaire talks with older woman	Mondaire Jones	00:01:03
Mondaire in classroom	Mondaire Jones	00:01:08
Mondaire listening	Mondaire Jones	00:02:05
	Total Mondaire footage used	00:16:08

“Endorsements 2”

Visual	Source	Duration (mm:ss:frames)
Ad #2 "Endorsements"	Frames per second: 24:00	Ad duration: 00:30:00
Mondaire for Congress - Endorsements (V4 - Spoken Disclaimer)		https://vimeo.com/428656757/5208c052a4
Small town	Pexels.com Stock Footage	00:01:06
Titles	Designed in Premiere	00:03:12
Custom graphics	Designed in Premiere	00:08:01
Mondaire outside	Mondaire Jones	00:02:07
Mondaire walking past station	Mondaire Jones	00:03:15
Mondaire shaking hands	Mondaire Jones	00:01:15
Sunlit trees	Pexels.com Stock Footage	00:02:21
Mondaire listening	Mondaire Jones	00:01:15
Mondaire talking to woman	Mondaire Jones	00:01:16
Mondaire in classroom	Mondaire Jones	00:01:08
Mondaire close up listening	Mondaire Jones	00:02:05
	Total Mondaire footage used	00:14:09

Attachment 2

Video Advertisement Spending Breakdown

Video Ads	Video Pre June 17	Video Post June 18
Hulu	\$2,318.29	\$5,317.24
Pandora	\$1,933.00	\$2,567.00
TTD	\$0.00	\$10,992.00
Univision	\$0.00	\$1,182.70
Youtube	\$0.00	\$4,438.77
Vevo	\$1,226.21	\$9,431.03
Facebook	\$2,285.40	\$21,220.79
TOTAL VIDEO BUYS	\$7,762.90	\$55,149.53
TOTAL VIDEO BUYS PERCENT OF TOTAL VIDEO	\$62,912.43	
	12.34%	87.66%
OVERALL DIGITAL TOTAL (including audio, graphics, and data fees)	\$68,452.64	