

RECEIVED

By OGC-CELA at 1:29 pm, Oct 14, 2020

Regal Blue Media LLC
 130 Carpenter St.
 Blossburg PA 16912

Letter Re: MUR7788 FEC Notification Letter

Greetings,

In response the complaint filed by Mr. McCann, we provide the following Facts of the Case:

Intellz LLC was paid by the client, Pallotta For Congress, for consulting and for marketing. Regal Blue Media LLC was engaged by Intellz to conduct a small marketing campaign in support of the campaign.

For campaign ads, disclaimers were provided save for an advertisement which contained a graphic showing "Pallotta for Congress" but, due to inadvertent human error, a text disclaimer was not added, as it had been for other ads. That said it was one error among multiple ads placed with the disclaimer in place, the error proved harmless as to the result.

The Trump Revolution is not an entity but is a Facebook Page operated and owned by Regal Blue Media, in the same way a publisher might own or operate multiple publication titles. As a practice and rule, disclaimers were added to ads placed on this page on the campaign's behalf, with the possible exception of the one that clearly had a Pallotta for Congress graphic but where the text disclaimer was inadvertently not added.

In an abundance of caution in a good faith effort to preclude future such error we have placed additional checks into place. Additionally, Facebook now allows for connecting pages to other pages, for instance, today we would connect The Trump Revolution Page directly to a campaign page and it would automatically carry the campaign disclaimer. At this time, it was our understanding, and experience, that this linking of pages was not functional.

Submitted are screenshots of the ads that were referenced in the complaint letter which clearly show disclaimers manually added in text and which also show that the ad without the disclaimer manually added in text did clearly have a Pallotta for Congress graphic.

With respect to other aspects of the complaint, Regal Blue Media was not privy to any of those matters and provided advertising only for the campaign as a contractor to Intellz, which was the entity paid by the campaign.

Regal Blue Media is a media and digital publishing company and has its own websites and properties which it promotes, in addition to promoting pages and building a digital audience.

Regal Blue Media is owned by William R. Collier Jr. and Dora L. Collier whose ad accounts are connected to the business account. Facebook disclaimers show the name of the person on the ad account, hence, prior to upgrades in the disclaimer functionality, such as allowing pages to be connected, manual disclaimers were added via text and/or as part of images for political campaigns.



William R. Collier Jr
 President, Regal Blue Media LLC
 Date- October 13, 2020



The Trump Revolution
Sponsored · Paid for by Dora Louise
Collier ·

...

Please sign our petition to get on the ballot for
New Jersey's 5th Congressional District. PAID
FOR BY PALLOTTA FOR CONGRESS



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PALLOTTAFORCONGRESS.COM

**SIGN THE PETITION TO
GET PALLOTTA ON THE...**

[LEARN MORE](#)

3 Placements

Facebook Feeds

Pallotta For Congress
Sponsored · Paid for by PALLOTTA FOR CONGRESS ·

To all the Residents of New Jersey's 5th Congressional District!
[...See More](#)

PALLOTTA FOR CONGRESS

PALLOTTAFORCONGRESS.COM
Petition for Member of the U.S. House of Representatives - Frank Pallotta for Congress

Kelly An... 14 Comments 23 Shares

Feeds

PALLOTTA

PALLOTTA

Stories

PALLOTTA

 Inactive

Mar 21, 2020 - Mar 23, 2020

ID: 807803029630704

  

 **The Trump Revolution**
Sponsored - Paid for by Dora Louise Collier

Please sign our petition to get on the ballot for New Jersey's 5th Congressional District. PAID FOR BY PALLOTTA FOR CONGRESS



PALLOTTAFORCONGRESS.COM
SIGN THE PETITION TO GET PALLOTTA ON THE BALLOT

[Learn ...](#)

[See Ad Details](#)

 Inactive

Mar 21, 2020 - Mar 21, 2020

ID: 519844875604275

  

 **The Trump Revolution**
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Please sign our petition to get on the ballot for New Jersey's 5th Congressional District. PAID FOR BY PALLOTTA FOR CONGRESS



PALLOTTAFORCONGRESS.COM
SIGN THE PETITION TO GET PALLOTTA ON THE BALLOT

[Learn ...](#)

[See Ad Details](#)

5:45 4G 74%

Home > CAMPAIGN

 **The Trump Revolution** • ...
Sponsored · Paid for by Dora Louise Collier · 

Governor Phil Murphy's shut-down of the Second Amendment cannot stand.

 Paid for by Dora Lou...
FRANK PALLOTTA
FOR CONGRESS

SUSSEXCOUNTYWATCHDOG.COM
Pallotta Demands explanation from Murphy on Second Amendment shut-down

1 Like 87 Comments 20 Shares

Like Comment Share

Preview All

RESULTS 

LIFETIME 7 DAYS 1 DAY

Mar 24, 2020 - Mar 31, 2020

37,112 Reach 

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