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FEDERAL ELECTION COMMISSION

OCTOBER 1, 2020 10:41 AM

OFFICE OF GENERAL COUNSEL

**BEFORE THE FEDERAL ELECTION COMMISSION**

PATRIOTS OF AMERICA PAC	)
FEC ID Number C00739151	)
441 North Lee Street, Suite 100	)
Alexandria, VA 22314,	)
	)
<i>Complainant,</i>	)
	)
v.	)
	)
SHOUT OUT AMERICA PAC	)
griffin.kk@gmail.com	)
	)
Karyn Kay Griffin, Executive Director	)
Shout Out America PAC	)
4253 North Rhodes Avenue	)
Meridian, ID 83646	)
<u>griffin.kk@gmail.com</u>	)
	)
<i>Respondents.</i>	)
	)

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**MUR 7810****VERIFIED COMPLAINT****Introduction**

1. Patriots of America PAC hereby files this Complaint against Shout Out America PAC and its “Executive Director”, Karyn Kay Griffin (See Exh. E), for failing to register as a political action committee with the Federal Election Commission (the “FEC”) in violation of 52 U.S.C. § 30101(4)(A) and 11 C.F.R. § 100.5(a) and other violations of applicable laws governing campaign finance and political action committees.

2. Additionally, Shout Out America PAC and Karyn Kay Griffin have made fraudulent representations to the public regarding how contributions it solicits will be used in violation of 18 U.S.C. § 1343 (“Fraud by wire, radio, or television”).

3. This Commission should take action to protect the general public from the willful campaign finance violations and fraudulent actions of Respondents.

### **PARTIES**

4. Complainant PATRIOTS OF AMERICA PAC is a non-connected hybrid political action committee registered with the Federal Election Commission (“FEC”).

5. Respondent SHOUT OUT AMERICA PAC (“SOA PAC”) claims to be a political action committee.

6. Respondent Karyn Kay Griffin (“Griffin”) is the Executive Director of SOA PAC and, upon information and belief, the individual responsible for the creation, management, and affairs of SOA PAC. Exh. D, pg. 2.

### **RELEVANT CAMPAIGN FINANCE LAWS**

7. Registration Requirements – 52 U.S.C. § 30101(4)(A) defines political committee as “any committee, club, association, or other group of persons which receives contributions aggregating in excess of \$1,000 during a calendar year or which makes expenditures aggregating in excess of \$1,000 during a calendar year”. 52 U.S.C. § 30101(4)(A); *accord* 11 C.F.R. § 100.5(a). 52 U.S.C. § 30103(a) and 11 C.F.R. § 102.1(d) require a committee to register with the FEC within ten (10) days of becoming a political committee.

8. Disclaimer Requirements – 52 U.S.C. § 30120(a) provides any “general public political advertising” by a political committee or any solicitation by any person distributed through “general public political advertising” must contain a disclaimer. Commission regulations specify these requirements apply to “all Internet websites of political committees available to the general public.” 11 C.F.R. § 110.11(a)(1). If the communication, “including any solicitation, is not authorized by a candidate, authorized committee of a candidate, or an agent of either of the

foregoing,” it must “clearly state the full name and permanent street address, telephone number, or World Wide Web address of the person who paid for the communication, and that the communication is not authorized by any candidate or candidate’s committee.” 52 U.S.C. § 30120(a)(3); *accord* 11 C.F.R. § 110.11(b)(3).

9.     Solicitation Best Efforts – 52 U.S.C. § 30102(i) specifies “when the treasurer of a political committee shows that best efforts have been used to obtain, maintain, and submit the information required by this Act for the political committee, any report or any records shall be considered in compliance with this Act”. 11 C.F.R. § 104.7(b)(1)(i) provides “the treasurer and the political committee will only be deemed to have exercised best efforts to obtain, maintain and report the required information if: (i) all written solicitations for contributions include a clear request for the contributor’s full name, mailing address, occupation and name of employer, and include an accurate statement of Federal law regarding the collection and reporting of individual contributor identifications.”

10.    Corporate Contributions – 11 C.F.R. § 114.2(b) specifies, “Any corporation whatever or any labor organization is prohibited from making a contribution as defined in 11 C.F.R. § 100, subpart B. Any corporation whatever or any labor organization is prohibited from making a contribution as defined in 11 C.F.R. § 114.1(a) in connection with any Federal election.”

11.    Wire Fraud – 18 U.S.C. § 1343 provides “Whoever, having devised or intending to devise any scheme or artifice to defraud, or for obtaining money or property by means of false or fraudulent pretenses, representations, or promises, transmits or causes to be transmitted by means of wire . . . in interstate or foreign commerce, any writings, signs, signals, pictures, or sounds for the purpose of executing such scheme or artifice, shall be fined under this title or imprisoned not more than 20 years, or both.”

## **FACTUAL BASIS**

12. A search of FEC registered political action committees revealed SAO PAC is not registered with the FEC. Exh. A.

13. SOA PAC's website is located at [www.shoutoutamericapac.org](http://www.shoutoutamericapac.org) ("Website") as shown in Exh. B and a "WHOIS" search result indicates the URL was registered on July 24, 2020. Exh C.

14. SOA PAC's website clearly calls for the election of President Trump, and solicits contributions for that purpose. Exh. B, D, and E.

15. The disclaimer at the bottom of the Website indicates it is "Paid for by Shout Out America PAC". Exh. B.

16. When a Website visitor clicks on the "Learn More" button, the visitor is directed to <https://shoutoutamericapac.org/wp-content/uploads/2020/09/Shout-Out-America-PAC-One-Sheet-August-2020.pdf>, which is a pdf document entitled "Shout Out America[,] A New Political Action Committee[,] Overview" ("Overview"). Exh. D.<sup>1</sup>

17. This Overview indicates SOA PAC seeks to target NASCAR fans who are currently unregistered voters through a partnership with Go Fas Racing's "fully wrapped car #32". Exh. D, pg. 2.

18. The Overview further provides "We have access to their social and email base to further spread our message. While it takes millions of dollars to create enough impressions through national television advertising, we can accomplish even more with this partnership and at a significantly reduced investment." Exh. D, pg. 2.

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<sup>1</sup> As of September 21, 2020, the website operator has since removed the "Learn More" button as shown in Exh. B. Notwithstanding this removal, the hyperlink to the Overview pdf (Exh. D) is still operational and links to this document.

19. When a Website visitor clicks the “Donate” button, the visitor is directed to <http://shoutoutamericapac.org/donate/>. The webpage indicates contributions are needed to “Keep your liberties alive. Protect your assets. Help us re-elect President Donald J. Trump. We need \$2M to get us through the election . . .” SOA PAC further provides “Every donation is welcomed and needed to accomplish our mission.” Exh. E.

20. Contact information for “K. Kay Griffin”, including a telephone number and email address, is provided in the event a visitor wants to contribute via a wire transfer and the page also includes a button that permits contributions via Paypal. Exh. E.

21. The Paypal processing page indicates visitors can “Donate to Shout Out America PAC” and offers the option of contributing either through a Paypal account or through a debit or credit card in the amounts of \$50 USD, \$100 USD, \$250 USD, and “Other Amount”. Exh. F.

22. An amount must be entered on this initial page before a potential contributor can continue with the transaction. Exh. F.

### **CAUSES OF ACTION**

#### **COUNT I**

#### **AGAINST ALL RESPONDENTS**

**Failure to Register with the Federal Election Commission**  
**in Violation of 52 U.S.C. § 30101(4)(A) and 11 C.F.R. § 100.5(a)**

23. Complainant hereby re-alleges and incorporates by reference the preceding paragraphs as if fully set forth herein.

24. 52 U.S.C. § 30101(4)(A) and 11 C.F.R. § 100.5(a) specify “the term ‘political committee’ means (A) any committee, club, association, or other group of persons which receives contributions aggregating in excess of \$1,000 during a calendar year or which makes expenditures aggregating in excess of \$1,000 during a calendar year”.

25. After satisfying the requirements of 52 U.S.C. § 30101(4)(A) and 11 C.F.R. § 100.5(a) and becoming a political committee, a committee is required to register with the FEC within ten (10) days. 52 U.S.C. § 30103(a); *accord* 11 C.F.R. § 102.1(d).

26. Upon information and belief, and based upon the lack of public filings with the FEC as evidenced by Exh. A, Respondents have not registered with the FEC.

27. Upon information and belief, Complainant believes Respondents are required to do so as they have likely exceeded the one thousand dollar (\$1,000) monetary threshold for expenditures that mandates registration with the FEC. 52 U.S.C. § 30101(4)(A); *accord* 11 C.F.R. § 100.5(a).

28. The Website URL was registered on July 24, 2020 according to a “WHOIS” search and was procured and registered for a fee through the service Wild West Domains LLC. Exh. C.

29. Upon information and belief, and in evaluating the entirety of the Website, including the graphics, overall presentation, and linked Overview, the Website appears professionally constructed and at considerable cost.

30. As Respondents have likely exceeded the monetary threshold mandating registration and have not in fact registered as evidenced by Exh. A, Respondents are in violation of 52 U.S.C. § 30103(a) and 11 C.F.R. § 102.1(d).

WHEREFORE, Respondents violated 52 U.S.C. § 30101(4)(A) and 11 C.F.R. § 100.5(a) and 52 U.S.C. § 30103(a) and 11 C.F.R. § 102.1(d).

**COUNT II**  
**AGAINST ALL RESPONDENTS**  
**Failure to Include Required Disclaimers in**  
**Violation of 52 U.S.C. § 30120(a)(3) and 11 C.F.R. § 110.11(a)(1) and (b)(3)**

31. Complainant hereby re-alleges and incorporates by reference the preceding paragraphs as if fully set forth herein.

32. The Overview accessed through the Website fails to include the required disclaimer as mandated by 52 U.S.C. § 30120(a)(3) and 11 C.F.R. § 110.11(a)(1). Exh. D.

33. 11 C.F.R. § 110.11(a)(1) further provides “all Internet websites of political committees available to the general public” must include the required disclaimer.

34. Specifically, the Overview, “if not authorized by a candidate, an authorized political committee of a candidate, or its agents, shall clearly state the name and permanent street address, telephone number, or World Wide Web address of the person who paid for the communication and state that the communication is not authorized by any candidate or candidate’s committee.” 52 U.S.C. § 30120(a)(3); *accord* 11 C.F.R. § 110.11(b)(3).

35. As evidenced by Exh. D, neither page of the Overview includes this mandatory disclaimer language and Respondents have thereby failed to satisfy the requirements of 52 U.S.C. § 30120(a)(3) and 11 C.F.R. § 110.11(a)(1) and (b)(3).

WHEREFORE, Respondents violated 52 U.S.C. § 30120(a)(3) and 11 C.F.R. § 110.11(a)(1) and (b)(3).

**COUNT III**  
**AGAINST ALL RESPONDENTS**  
**Failure to Include Required Solicitation Disclaimers in**  
**Violation of 52 U.S.C. § 30102(i) and 11 C.F.R. § 104.7(b)**

36. Complainant hereby re-alleges and incorporates by reference the preceding paragraphs as if fully set forth herein.

37. Respondents failed to include required disclaimer language specified in Count II above on the contribution page. 52 U.S.C. § 30120(a)(3) and 11 C.F.R. § 110.11(a)(1) and (b)(3).

38. Further, the treasurer of a political committee is required to perform its best efforts to report “the identification as defined at 11 C.F.R. § 100.12 of each person whose contribution(s) to the political committee . . . aggregate in excess of \$200 in a calendar year”. 11 CFR §104.7(b).

39. To satisfy this requirement, “the treasurer and the political committee will only be deemed to have exercised best efforts to obtain, maintain and report the required information if: (1)(i) All written solicitations for contributions include a clear request for the contributor’s full name, mailing address, occupation and name of employer, and include an accurate statement of Federal law regarding the collection and reporting of individual contributor identifications; (1)(ii) The request and statement shall appear in a clear and conspicuous manner on any response material included in a solicitation.” 11 CFR §104.7(b)(1)(i-ii).

40. Upon clicking the “Donate” button, a Website visitor is directed to the “Donate” webpage, which articulates how contributed funds will be used and provides an option for a visitor to contribute via Paypal by clicking “DONATE VIA PAYPAL”. Exh. E.

41. The Paypal contribution page permits funds to be contributed through a Paypal account or credit or debit card. Exh. F.

42. As evidenced through Exh. F, Respondents failed to include any disclaimer or best efforts language as required by 52 U.S.C. § 30102(i) and 11 CFR §104.7(b)(1)(i-ii).

WHEREFORE, Respondents violated 52 U.S.C. § 30102(i) and 11 CFR §104.7(b)(1)(i-ii).

**COUNT IV**  
**AGAINST ALL RESPONDENTS**  
**Solicitation of Corporate Contributions**  
**Violation of 11 C.F.R. § 114.2(b)**

43. Complainant hereby re-alleges and incorporates by reference the preceding paragraphs as if fully set forth herein.

44. Following *SpeechNow.org v. FEC*, 599 F.3d 686 (D.C. Cir. 2010) (en banc) and *Carey v. FEC*, 791 F. Supp. 2d 121 (D.D.C. 2011), corporations and labor organizations may contribute to political committees that engage in independent expenditure only activity (“Super PAC”) or operate as a non-connected committee with a non-contribution account (“Hybrid PAC”) without violating the corporate contribution prohibition specified in 11 C.F.R. § 114.2(b).

45. Committees that desire to operate as either a Super PAC or Hybrid PAC must register with the FEC and specify the committee’s intention to operate in such a manner. *See* “Registering as a Super PAC”, located at <https://www.fec.gov/help-candidates-and-committees/filing-pac-reports/registering-super-pac/> (last accessed September 15, 2020) and “Registering as a Hybrid PAC”, located at <https://www.fec.gov/help-candidates-and-committees/filing-pac-reports/registering-hybrid-pac/> (last accessed September 15, 2020).

46. When creating a political action committee through the FEC’s Form 1 webform process, the filer must answer a series of questions about the new committee, including whether the committee is authorized by a federal candidate, and, if not, whether the committee is a party committee, joint fundraising committee, or other political action committee. FEC Online Webforms, Form 1 completion steps 10% through 25%, located at <https://webforms.fec.gov/webforms/form1/candidateoption.htm> and

<https://webforms.fec.gov/webforms/form1/unauthorizedcandidateopts.htm>, respectively (last accessed September 21, 2020).

47. If the filer indicates the non-candidate committee type is “other political action committee”, the filer must then specify whether the committee is a separate segregated fund, nonconnected committee, or single candidate independent expenditure committee. FEC Online Webforms, Form 1 process completion 30%, located at

<https://webforms.fec.gov/webforms/form1/pactypeopts.htm> (last accessed September 21, 2020).

48. It is at this stage of the process that the filer must check one of the two boxes beneath the nonconnected committee selection if the committee intends to register as either a Super PAC or Hybrid PAC. FEC Online Webforms, Form 1 process completion 30%, located at <https://webforms.fec.gov/webforms/form1/pactypeopts.htm> (last accessed September 21, 2020).

49. If the filer does not select one of these two options for the committee, the committee is asked whether it is a leadership PAC or a lobbyist/registrant PAC and must then provide required identifying information. FEC Online Webforms, Form 1 process completion 30% through 50%, located at <https://webforms.fec.gov/webforms/form1/nonconnectedpac.htm> and <https://webforms.fec.gov/webforms/form1/unauthorizedwizard.htm>, respectively (last accessed September 21, 2020).

50. In the absence of an affirmative action by the filer registering the committee as a nonconnected committee and specifying the committee intends to operate as a Super PAC or Hybrid PAC through the checkbox selection discussed above, the committee is registered as a traditional non-connected committee prohibited from accepting corporate contributions pursuant to 11 C.F.R. § 114.2(b).

51. “Any corporation whatever or labor organization is prohibited from making a contribution as defined in 11 C.F.R. part 11, subpart B. Any corporation whatever or any labor organization is prohibited from making a contribution as defined in 11 C.F.R. 114.1(a) in connection with any Federal election.” 11 C.F.R. § 114.2(b).

52. Upon information and belief, and as evidenced by Exh. A, Respondents have not registered with the FEC and affirmatively declared the committee will operate as either a Super PAC or a Hybrid PAC.

53. Thus, as SOA PAC has not registered as a Super PAC or Hybrid PAC, it is prohibited from accepting any corporate contributions of any kind pursuant to 11 C.F.R. § 114.2(b).

54. However, the Overview provides, “There are many perks that accompany your donation. We can be creative and utilize the space on the Trump car to further promote your business.” Exh. D, pg. 2.

55. Such a statement creates an appearance and reasonable inference that SOA PAC is engaging in impermissible conduct or may solicit impermissible funds by accepting corporate contributions in violation of 11 C.F.R. § 114.2(b).

WHEREFORE, Respondents violated 11 C.F.R. § 114.2(b).

**COUNT IV**  
**AGAINST ALL RESPONDENTS**  
**Wire Fraud**  
**in Violation of 18 U.S.C. § 1343**

56. Complainant hereby re-alleges and incorporates by reference the preceding paragraphs as if fully set forth herein.

57. 18 U.S.C. § 1343 provides “Whoever, having devised or intending to devise any scheme or artifice to defraud, or for obtaining money or property by means of false or fraudulent

pretenses, representations, or promises, transmits or causes to be transmitted by means of wire . . . in interstate or foreign commerce, any writings, signs, signals, pictures, or sounds for the purpose of executing such scheme or artifice, shall be fined under this title or imprisoned not more than 20 years, or both.”

58. The Overview provided by SOA PAC specifically states SOA PAC requires “\$2M to take us through election day. In addition to funding the race team, proceeds will allow for the voter registration ground game, strong digital presence, national marketing, event promotion and merchandize – with the later further funding our efforts.” Exh. D, pg. 2.

59. The race team funding is to occur through an alleged partnership with Go Fas Racing and Car #32. “Our primary means of engaging NASCAR fans is through a partnership with Go Fas Racing’s fully wrapped car #32. We have access to their social media and email base to further spread our message.” Exh. D, pg. 2.

60. Upon information and belief and based on conversations with Go Fas Racing, this representation by Respondents is completely false.

61. Go Fas Racing contracted with Complainant for services during the current NASCAR season and, upon information and belief, has not worked with any other political action committees, including Respondents.

62. Upon information and belief, any partnership representations by Respondents in furtherance of SOA PAC’s fundraising efforts is an attempt to solicit funds based on fraudulent representations to an unknowing and unsuspecting public.

63. The Department of Justice has investigated and prosecuted candidates and political action committees for wire fraud pursuant to 18 U.S.C. § 1343. Examples include the prosecution of Kelley Rogers (Department of Justice Press Release dated January 17, 2020 and located at

<https://www.justice.gov/usao-edva/pr/political-consultant-sentenced-fraud-involving-scam-pacs>), Harold Russel Taub (Department of Justice Press Release dated July 24, 2019 and located at <https://www.justice.gov/usao-ri/pr/former-candidate-sentenced-fraud-and-campaign-finance>), and William Tierney (Department of Justice Press Release dated November 2, 2018 and located at <https://www.justice.gov/usao-sdny/pr/arizona-man-pleads-guilty-using-scam-political-action-committees-defraud-tens-thousands>).

64. As enforcement of 18 U.S.C. § 1343 is beyond the purview of the FEC, Complainant hereby requests the FEC refer this matter to the Department of Justice for investigation and prosecution.

WHEREFORE, Respondents violated 18 U.S.C. § 1343.

### **CONCLUSION**

For these reasons, Complainant Patriots of America PAC respectfully requests the Federal Election Commission commence enforcement proceedings against Respondents.

Respectfully submitted,



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*Counsel for Complainant Patriots of America PAC*

**VERIFICATION**

I declare under penalty of perjury that the foregoing is true and correct to the best of my personal knowledge.

Dated September 30, 2020



Dan Backer, Esq.  
*Counsel for Complainant Patriots of America PAC*

COMPLETED BEFORE A NOTARY PUBLIC

State of Virginia

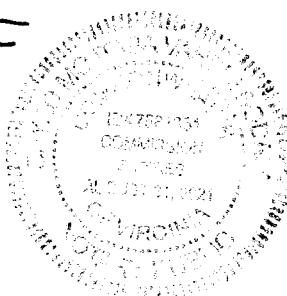
City of Vienna

County of Fairfax

Subscribed and sworn to before me on this 30 day of Sep, 2020, by

Dan Backer

My Commission expires on 8-31-2021.



## Exhibit A

Search Performed September 22, 2020 at 8:51 PM Eastern Standard Time

The screenshot shows the FEC's campaign finance data search results. The search term "Shout Out America PAC" is entered in the search bar. The results table is empty, indicating "No data available in table". The table has columns for Name, Committee ID, Treasurer, Type, Designation, and First filing date. The search interface includes filters for Committee Name or ID, Years Active, Committee details, and Committee type. The FEC logo and navigation links are visible at the top of the page.

fec.gov/data/committees/?q=Shout+Out+America+PAC

An official website of the United States government [Here's how you know](#)

**Federal Election Commission**  
UNITED STATES - of - AMERICA

Campaign finance data ▾ Help for candidates and committees ▾ Legal resources ▾ About ▾

Home > Campaign finance data > Browse data > Committees

**Edit filters** | **Committees** | i This table has no data to export. | [Export](#)

Viewing 0 filtered results for: "Shout Out America PAC" [X](#)

Clear all filters [X](#)

Name	Committee ID	Treasurer	Type	Designation	First filing date
No data available in table					

Results per page: 30 | Showing 0 to 0 of 0 entries

[Feedback](#)

Exhibit B

# Giving Voice to the Silent Majority

# Shout Out AMERICA

A New Political Action Committee

## Coming Soon

**Life, Liberty, Freedom and the Pursuit of Happiness  
are the core values that define our nation**

We are Republicans, Independents and walk-away Democrats who are fed up with the antics of the Progressive Left. We have to win the fight for our country on November 3rd — and our time is limited. We can win by coming together. Giving voice to those unwilling to speak publicly. Uniting conservatives by rallying around common themes. And reminding those who are on the fence that only through our founding values can we "Make America Great Again."

[LEARN MORE](#)[DONATE](#)

### RACE TO THE POLLS

We're ramping up to crush the last two months of the election cycle. Join us.

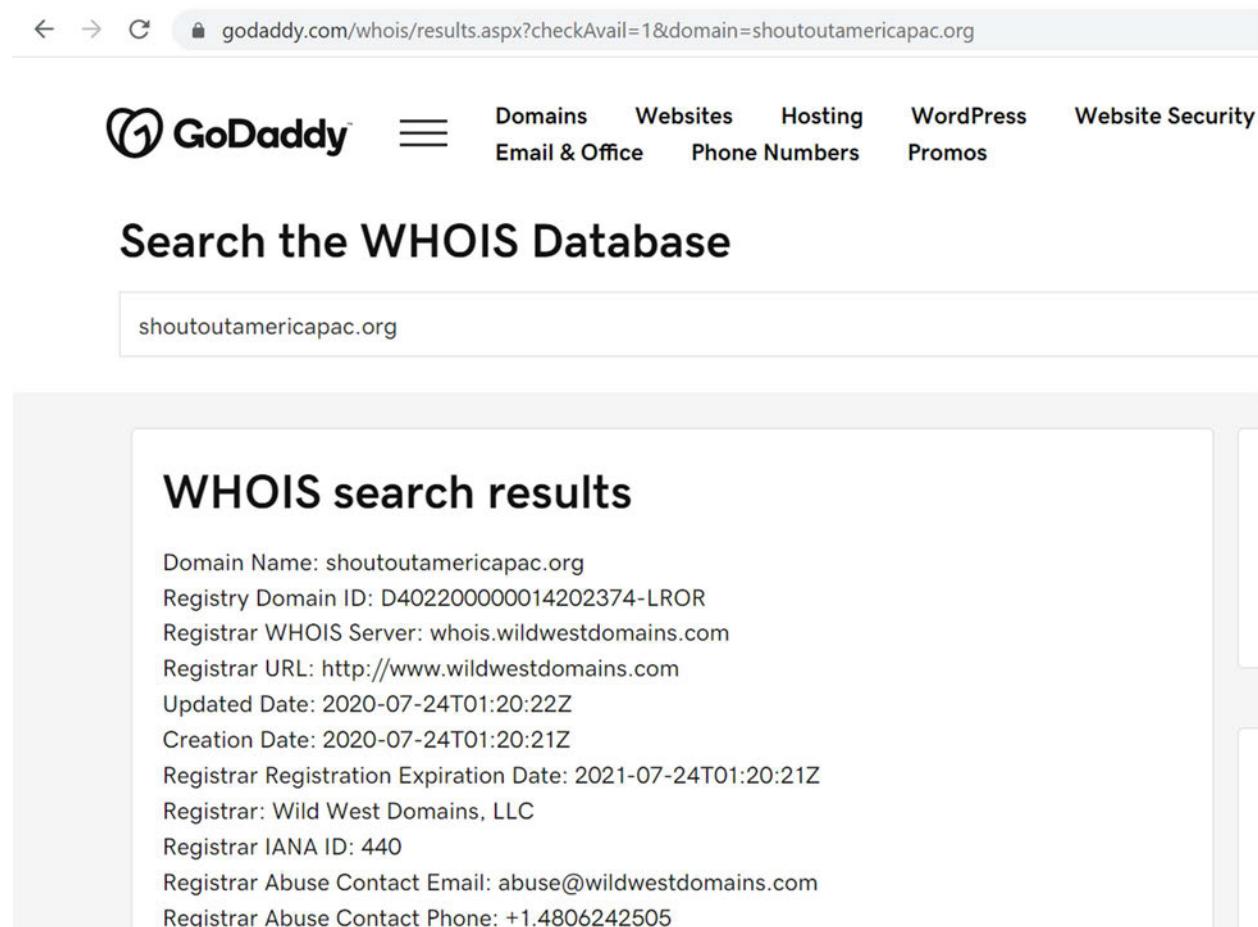
 First Name \* Last Name \* Mobile Phone \* Email \* ZIP Code \*[SUBMIT](#)

\* Required

Paid for by Shout Out America PAC  
Not authorized by any candidate or candidate's committee  
ShoutOutAmericaPAC.org

## Exhibit C

Search Performed September 22, 2020 at 8:58 PM Eastern Standard Time



The screenshot shows a web browser window with the URL [godaddy.com/whois/results.aspx?checkAvail=1&domain=shoutoutamericapac.org](https://godaddy.com/whois/results.aspx?checkAvail=1&domain=shoutoutamericapac.org) in the address bar. The page is a GoDaddy WHOIS search results page. At the top, the GoDaddy logo is on the left, followed by a navigation menu with links to Domains, Websites, Hosting, WordPress, and Website Security. Below the menu, there are links for Email & Office and Phone Numbers, and a Promos section. The main heading is "Search the WHOIS Database". A search bar contains the domain name "shoutoutamericapac.org". The results section is titled "WHOIS search results" and lists the following information:

- Domain Name: shoutoutamericapac.org
- Registry Domain ID: D402200000014202374-LROR
- Registrar WHOIS Server: whois.wildwestdomains.com
- Registrar URL: <http://www.wildwestdomains.com>
- Updated Date: 2020-07-24T01:20:22Z
- Creation Date: 2020-07-24T01:20:21Z
- Registrar Registration Expiration Date: 2021-07-24T01:20:21Z
- Registrar: Wild West Domains, LLC
- Registrar IANA ID: 440
- Registrar Abuse Contact Email: [abuse@wildwestdomains.com](mailto:abuse@wildwestdomains.com)
- Registrar Abuse Contact Phone: +1.4806242505

# Shout Out AMERICA

A New Political  
Action Committee

## OVERVIEW



## RACE TO THE POLLS



### Life, Liberty, Freedom and the Pursuit of Happiness are the core values that define our nation

Where the left sees “darkness,” we see greatness. When the Left punctuates “challenging times,” we believe in the boundless capacity of the American people to meet any challenge and to fight any foe to defend our freedoms. When the left talks, we “do.”

It's clear that Donald Trump has made America great again with:

- tax cuts
- border security
- millions of jobs
- federal judge appointments
- net-energy exports
- trade deals
- soaring stock market gains and much more

The silent majority is well aware of Trump's accomplishments. But the media unrelentingly lashes out at every act, every word and every

deed. That's all that America hears — and that's reflected in the polls.

### It's Time to STEP UP, Take a Stance

We have to win this fight for our country on November 3rd — and our time is limited. We can win by coming together. Giving voice to those unwilling to speak publicly. Uniting conservatives by rallying around common themes. And reminding those who are on the fence that only through our founding values can we “Make America Great Again.”

### Shout Out America PAC

We are Republicans, Independents and walk-away Democrats who are fed up with the antics of the Progressive Left. We love God and our country. We uphold the law, we honor our veterans, we respect private property, we protect the unborn and we hold strong the right to bear arms. We know that those who have worked hard to achieve their American dream should contribute

to the tax base — but not to the extent of supporting those who choose not to contribute at all. We believe in the idealistic, Rockwell view of America — baseball, apple pie and family. And when we peel back the negative news, we can see millions of American who feel the same.

### Promote the Vote

To re-elect Trump, we need to capture the attention of unregistered voters — especially those in the battleground states. We need to find them where they are — in their activities of daily life — and educate them on the importance of their decision. That their vote is important — urgently realizing that what we are experiencing today will only get worse and to understand their lives will take a negative turn with a Democrat at the helm.

Our children are also at risk. We will lose the right to teach our own kids what we feel is best, including our own family morals and values.

[> more](#)

## We Have Identified 15,000,000 Unregistered Voters

While the majority of national sports have gone dark, NASCAR is alive and well. Viewership, market share, digital views and engagements are up — and not only are the numbers rising but they are skyrocketing.

### Here's the Opportunity

Of the 75 million loyal, conservative NASCAR fans, 15 million are unregistered voters — all glued to their TVs, watching every angle and every move. By placing our message on the racetrack, we can embed the Trump 2020/Vote message.

### Partnering with NASCAR's Go Fas Racing and Car #32

Our primary means of engaging NASCAR fans is through a partnership with Go Fas Racing's fully wrapped car #32. We have access to their social and email base to further spread our message. While it takes millions of dollars to create

enough impressions through national television advertising, we can accomplish even more with this partnership and at a significantly reduced investment.

#### The Voice of the PAC

Go Fas Racing's owner, Archie St. Hilaire, is an outspoken Trump supporter who will speak his voice in promoting these efforts through interviews, videos and social platforms.

### With enough funding, we can be on the track for the following races:

①	September 12	Richmond
②	September 27	Las Vegas
③	October 4	Talladega
④	October 11	Charlotte
⑤	October 18	Kansas
⑥	October 25	Texas
⑦	November 1	Martinsville

Note: as of this writing, the above races are allowing spectators, giving us an even greater opportunity for voter engagement and registration.

## We need \$2M to take us through election day

In addition to funding the race team, proceeds will allow for the voter registration ground game, strong digital presence, national marketing, event promotion and merchandise — with the latter further funding our efforts.

#### Benefits of Participation

There are many perks that accompany your donation. We can be creative and utilize the space on the Trump car to further promote your business.

#### Rumor has it...

that Denny Hamlin, along with other professional African American Athletes, are buying Richard Petty's race team — with Bubba Wallace as the driver.

This action further elevates NASCAR and expands the audience — proving the efficacy of NASCAR in the world of marketing.

### Why is this Important to YOU?

While NASCAR may not be your sport of choice, it is the place to find an aggregate of voters necessary to make a difference and get Trump re-elected. It is only through donations of like-minded conservatives that we can push this effort to Keep America Great. If the Democrats win the presidential race, we all lose. As Pence noted in his brilliant speech at the RNC, we "won't be safe in Joe Biden's America."

**America needs four more years of President Donald Trump in the White House.** To keep what you have worked so diligently to build...

## YOU need Trump re-elected.

# RACE WITH US

Contact:  
K Kay Griffin  
Executive Director

303.523.3344  
griffin.kk@gmail.com

Shout Out America PAC  
ShoutOutAmericaPAC.org  
{coming soon}

Exhibit E

## Giving Voice to the Silent Majority

# Shout Out AMERICA

A New Political Action Committee

## Donate

Keep your liberties alive. Protect your assets.  
Help us re-elect President Donald Trump.

We need \$2M to get us through the election to:

- Fund Go Fas Racing's NASCAR #32 car with a fully wrapped "Trump 2020/Vote" on the track and a similarly wrapped "show" car parked at events.
- Bolster the voter registration ground game
- Create a strong digital presence, marketing, event promotion and merchandise

Every donation is welcomed and needed to accomplish our mission.

For wire transfer instructions, please contact:

K Kay Griffin > 303.523.3344 > griffin.kk@gmail.com

[DONATE VIA PAYPAL](#)



### RACE TO THE POLLS

We're ramping up to crush the last two months of the election cycle. Join us.

First Name \*

Last Name \*

Mobile Phone \*

Email \*

ZIP Code \*

[SUBMIT](#)

\* Required

## Exhibit F

# Shout Out AMERICA

Donate to  
Shout Out America PAC

Make this a monthly donation [?](#)

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