



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

**Statement on Final Audit Report
for the National Campaign Fund (A09-26)**

**Vice Chair Ellen L. Weintraub and
Commissioners Cynthia L. Bauerly and Steven T. Walther**

In the Commission's audit of the National Campaign Fund ("NCF"), the Audit Division, in consultation with the Office of General Counsel ("OGC"), recommended that the Commission make a finding that NCF failed to disclose spending for 60 express advocacy communications.¹ The Commission unanimously agreed 6-0 that 41 of the communications contained express advocacy and were therefore subject to the reporting requirements of the Federal Election Campaign Act of 1976, as amended ("the Act"), and the Commission's regulations.² However, the Commission deadlocked 3-3 on whether the 19 remaining communications also contained express advocacy. We agree with the staff recommendation that all 60 communications contained express advocacy under the Commission's regulations and should have been reported accordingly.³

¹ See Audit Division Recommendation Memorandum in National Campaign Fund at 1-2 (recommending that the Commission adopt a finding that, with regard to 60 express advocacy communications, NCF did not timely file 24/48-hour notices for \$1,153,748 of expenditures, did not file 24-hour notices for \$33,485 of expenditures and did not properly disclose expenditures totaling \$528,662 as "memo" entries prior to the time of payment). Pursuant to Commission Directive 70 (FEC Directive on Processing Audit Reports), the Final Audit Report ("the Report" or "FAR") is based on the recommendations in the ADRM. The Commission's vote on those recommendations determined the content of the Report. See Certification in Audit Division Recommendation Memorandum on National Campaign Fund, dated August 23, 2012 ("August 2012 Cert"). Documents related to the Commission's audit of the National Campaign Fund are available at www.fec.gov/audits/2008/AuditReport_2008_NationalCampaignFund.shtml.

² As a result, the Commission approved a finding that, with regard to the 41 communications that the Commission could agree contained express advocacy, NCF did not timely file 24/48-hour notices for \$946,596 of expenditures, did not file 24-hour notices for \$51,130 of expenditures, and did not properly disclose expenditures totaling \$528,662 as "memo" entries prior to the time of payment. See FAR, Finding 2 at 3-4.

³ Accordingly, we voted to approve the recommendations as presented in the ADRM. See August 2012 Cert. Chair Hunter and Commissioners McGahn and Petersen approved the Audit Staff's recommendation as to only 41 of the 60 communications. *Id.* Discussion of the expenditures associated with those 41 communications is included in the Report's "Finding 2." See FAR, Finding 2 at 3-4. However, because our colleagues disagreed with the recommended finding as to 19 of the 60 communications, the Report discusses the expenditures associated with those 19 communications in the "Additional Issues" section rather than in the Report's "Findings." See FAR, Additional Issues at 13-15.

The Commission's regulatory definition of express advocacy at 11 C.F.R. § 100.22 has two parts. Section 100.22(a) of the regulation includes communications that use words or phrases — such as "vote for" or "reject" — "which in context can have no other reasonable meaning than to urge the election or defeat" of a candidate. 11 C.F.R. § 100.22(a). Section 100.22(a) express advocacy includes communications that contain "in effect an explicit directive" to vote for or against a candidate. *FEC v. Massachusetts Citizens for Life, Inc.*, 479 U.S. 238, 249 (1986). This is sometimes referred to as "magic words" express advocacy. See *McConnell v. FEC*, 540 U.S. 93, 126 (2003). Section 100.22(b) of the regulation defines express advocacy as a communication that:

When taken as a whole and with limited reference to external events, such as the proximity to an 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.

11 C.F.R. § 100.22(b).

We believe that each of the 19 communications that our colleagues excluded quite clearly advocate for the election or defeat of a Federal candidate.⁴ For example:

- One communication states that the National Campaign Fund needs funds in order to “be a force in helping John McCain win the White House this year,” adding that “if you and I do nothing, John McCain will lose, and Barack Obama will become the next President of the United States.” See Attachment A.
- In one communication, the author states that “I will be working close to around the clock to push John McCain and the Republican Party OVER THE TOP on November 4th.” The letter asks the recipient to “[p]lease help push John McCain OVER THE TOP. And please help our Republican leadership surge to victory in the House and Senate.” See Attachment B.
- One communication states that “Barack Hussein Obama is without question *the most-liberal and most-dangerous major candidate* to *EVER* run for President of the United States. And frankly, *we fail to prevent his election at our own peril!*” See Attachment C (emphasis in original).

⁴ Most of these communications also contained solicitations for funds for the National Campaign Fund. We note, however, that solicitations are not exempt from the definition of express advocacy at 11 C.F.R. § 100.22. In fact, the presence of a solicitation for funds to help defeat a candidate tends to confirm (and certainly does not refute) that the “individual words... have no other reasonable meaning than to urge the election or defeat of one or more clearly identified candidates.” 11 C.F.R. § 100.22(a).

- One communication is contained in an envelope that says “Will you help us stop Senator Barack Obama’s ‘Global Tax Bill’ here in 2008? AND HELP KEEP HIM FROM BECOMING PRESIDENT BARACK OBAMA IN 2009?” The letter inside says “in addition to helping us defeat Obama’s ‘Global Poverty Act’ today... I also hope you will agree to help us defeat his bid for the White House in November.” See Attachment D (emphasis in original).

These communications clearly fall within the Commission’s regulation at 11 C.F.R. § 100.22(b), which includes communications that “can only be interpreted by a reasonable person as containing advocacy of the election or defeat of one or more clearly identified candidate(s).” As we have explained previously,⁵ 11 C.F.R. § 100.22(b) is a valid regulation⁶ that the Commission cannot simply ignore, and that should have been applied to the 19 communications referenced above.

Moreover, some of the 19 communications at issue are also covered by the Commission’s regulation at 11 C.F.R. § 100.22(a), because they contain words and phrases that “urge the election or defeat” of a candidate. The list in 100.22(a), which, by its own terms, is not, and was never intended to be, exhaustive,⁷ includes statements such as “support the Democratic nominee” or “reject the incumbent,” and it also includes more subtle statements, such as the word “defeat” accompanied by a picture of one or more candidates, or the use of a nickname, as in “vote against Old Hickory.” NCF’s communications included phrases like “be a force in helping John McCain win the White House” and “help us defeat [Obama’s] bid for the White House,” (emphasis in original), which are even more explicit in terms of their electoral advocacy than some of the examples provided in the text of section 100.22(a). One of these communications contains the word “defeat,” which is among the “magic words” referenced in the regulation.

One of Congress’s fundamental objectives in passing the Act was to ensure the effective disclosure of communications that advocate for or against a Federal candidate. As the Supreme Court stated in *Citizens United*, “effective disclosure” is what “enables the electorate to make informed decisions and give proper weight to different speakers and messages.” 558 U.S. 310, 130 S. Ct. 876, 916 (2010). We will continue to advocate for the full enforcement of the

⁵ Concurring Opinion of Vice Chair Ellen L. Weintraub and Commissioners Cynthia L. Bauerly and Steven T. Walther in Advisory Opinion 2012-11 (Free Speech), dated May 8, 2012, available at <http://saos.nictusa.com/aodocs/1209340.pdf>.

⁶ See *The Real Truth About Abortion, Inc. v. FEC*, 681 F.3d 544 (4th Cir. 2012) (concluding that 11 C.F.R. 100.22(b) is constitutional).

⁷ The regulation defines express advocacy to include any communication that “[u]ses phrases *such as*” the listed phrases. 11 C.F.R. § 100.22(a) (emphasis added).

(A09-26) (National Campaign Fund)
Statement of Vice Chair Weintraub and Commissioners Walther and Bauerly

Commission's disclosure requirements, particularly for communications, like these, that unmistakably advocate for the election or defeat of Federal candidates.

11/6/12
Date

Ellen L. Weintraub
Ellen L. Weintraub
Vice Chair

11/6/2012
Date

Cynthia L. Bauerly
Cynthia L. Bauerly
Commissioner

11/6/12
Date

Steven T. Walther
Steven T. Walther
Commissioner

(A09-26) (National Campaign Fund)
Statement of Vice Chair Weintraub and Commissioners Walther and Bauerly

Attachment A



NATIONAL CAMPAIGN FUND

**BUDGET
EMERGENCY**

Ms. Otelia F. Bodenstein
5716 Nelsons Bridge Rd.
Hanover, VA 23069-2607

Dear Ms. Bodenstein,

We are in the heat of the battle for America's future, and as National Campaign Fund Chairman, I hate to give you two pieces of bad news:

1. The Democrats are winning.
2. And the National Campaign Fund does not have the resources to turn the tide.

That's right, Ms. Bodenstein. Every national poll currently says that John McCain will lose this election and that the next President of the United States will be a Democrat.

And what's worse... the vital funds I'm counting on to help elect John McCain President this year are not there.

This is a Republican crisis, Ms. Bodenstein.

And that's why I have enclosed a postage-paid First Class label and a red secure zipper pouch with this urgent appeal for help.

Red to ensure that America remains Republican Red for John McCain.

I am facing a budget emergency, and I need your immediate help if the NCF is to be a force in helping John McCain win the White House this year.

Because as it stands right now, Ms. Bodenstein, my emergency accounts are drained, and I have no resources left to fight.

Paid for by the National Campaign Fund Political Action Committee, and not authorized by any candidate or candidate's committee.

1101 Pennsylvania Ave., NW, Suite 600, Washington, DC 20004
Phone: (202) 756-4578 www.nationalcampaignfund.com www.helpjohnmccain.com
E-mail: chairmanramsey@nationalcampaignfund.com

You are a friend and a loyal Republican, and I cannot allow the Democrats to run roughshod over us this year. I can't let this happen to you.

I will tell you what to do with your First Class label and secure red zipper pouch in just a moment, but first, let me explain why you and I are facing the biggest emergency you and I have ever faced.

Barack Obama is pulling out all the stops.

He is raising record amounts of cash, and reaching record amounts of people.

Assisted by the media and the compliant liberal special interests all too willing to lie about his Senate record, Obama is gaining ground in nearly every poll.

And he will do whatever it takes to win.

I know I don't have to tell you what will happen to this country if Barack Obama and the Democrats take over.

- The Bush tax cuts will expire, and the Democrats will siphon more money out of your paycheck – all with the blessing of President Obama.
- Our borders will be open to millions of illegal aliens, who will put a strain on our resources and infrastructure and be rewarded with citizenship.
- Our national defense will be weakened and defunded at a time when we need our Armed Forces most to continue fighting the War on Terrorism.

I know this is not the kind of America you want, my friend.

But this is the kind of America you will get if you set my letter aside today.

In this crisis, I need you by my side more than I ever have before. The National Campaign Fund needs you more than ever before.

Because at this point, if you and I do nothing, John McCain will lose, and Barack Obama will become the next President of the United States.

And I just can't let that happen.

So I'm turning to you for help – my friend, my confidant, my fellow Republican.

My budget is not going to be enough to fight off the Democrat onslaught. I'm operating on barebones dollars with not a penny to spare.

I won't beat around the bush. I need immediate emergency funding. And I'm turning to you – my last hope.

I refuse to give up the battle to elect John McCain.

I refuse to surrender this country to Barack Obama and the Democrats.

I refuse to give up the fight, but I need your help.

You've been a loyal friend and I know you are a committed Republican warrior, so I'm turning to you again in this budget emergency.

Please write out your most generous contribution to the National Campaign Fund – the largest you have ever written – and enclose it in the red zipper pouch I have sent you.

The zipper pouch will keep your maximum support secure on its way back to me, and as soon as I see your red zipper pouch, I will know that you are committed to keeping America red for Republican – that you are dedicated to ensuring that every state is a red state for John McCain.

I have also enclosed a First Class, postage-paid label for you. Please remove the adhesive backing from this label and affix it to your secure red zipper pouch.

You won't need to pay your own postage. I have pre-paid it for you with this critical label.

All you need to do is affix it to the zipper pouch and send your generous contribution back to me today.

For the sake of everything you and I have fought for, I need you to use this red

zipper pouch to help me battle for Republican victory.

Your \$100 contribution will help my efforts this summer to keep John McCain's campaign alive.

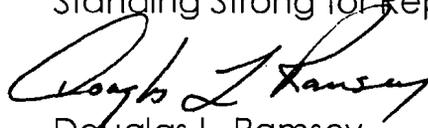
Your \$100 in the red pouch will help me keep the National Campaign Fund out of the red, Ms. Bodenstein.

The battle for the White House is heating up, and I have no resources left to fight.

Please rush your \$100 contribution back to me in the red zipper pouch tonight.

John McCain needs your help – and in this National Campaign Fund budget emergency, so do I, Ms. Bodenstein.

Standing Strong for Republican Victory,


Douglas L. Ramsey

Please detach and return this reply coupon in your red zipper pouch along with your generous contribution to help elect John McCain President of the United States

YES! I want to help the National Campaign Fund keep fighting to elect John McCain to the White House! To help the NCF in this budget emergency, I am rushing my generous contribution of:

() \$100 () \$_____ Other

Ms. Otelia F. Bodenstein
5716 Nelsons Bridge Rd.
Hanover, VA 23069-2607

23069BDNS716O20 8NBF2A1

IF YOU WISH TO CONTRIBUTE VIA CREDIT CARD, PLEASE COMPLETE THE FOLLOWING:	
TYPE OF CARD:	<input type="checkbox"/> VISA <input type="checkbox"/> MasterCard <input type="checkbox"/> AmEx <input type="checkbox"/> Discover
Amount of Gift	_____
Credit Card Number:	_____
Exp. Date:	_____
Name as it Appears on Card:	_____
Signature:	_____
Date of Authorization:	_____
Credit card donations will appear on your monthly statement as "NCF."	

Please make your generous check payable to: National Campaign Fund (P.O. Box 96639, Washington, D.C. 20090-6639)

Phone #: _____ E-mail: _____

Paid for by National Campaign Fund Political Action Committee, and not authorized by any candidate.

Contributions are not deductible for federal income-tax purposes. Federal law requires political committees to report the name, mailing address, occupation and name of employer for each individual whose contributions aggregate in excess of \$200 in a calendar year. Your contribution will be used in connection with Federal elections.

Occupation: _____

Employer: _____

Mailing address: _____

- Check if Retired
- Check if Homemaker
- Self-Proprietorship Business

**FIRST CLASS
POSTAGE PAID**



8NBF2

BUSINESS REPLY LABEL

FIRST CLASS PERMIT NO. 2028 WASHINGTON, D.C

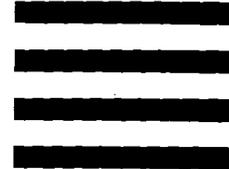
POSTAGE WILL BE PAID BY ADDRESSEE

National Campaign Fund

PO Box 96639

Washington, D.C. 20077-7352

NO POSTAGE
NECESSARY
IF MAILED
IN THE
UNITED STATES



(A09-26) (National Campaign Fund)
Statement of Vice Chair Weintraub and Commissioners Walther and Bauerly

Attachment B

National Campaign Fund
1101 Pennsylvania Ave., NW
Suite 600
Washington, D.C. 20004

First Class
U.S. Postage Paid
Permit #16
Fredericksburg, VA

ELECTION 2008 FINAL OVER THE TOP PUSH

NCF-ENBJ6, over the
TOP

Mrs. Phyllis Woodger
321 Granby Rd.
Granville, MA 01034-9483

First Class Mail

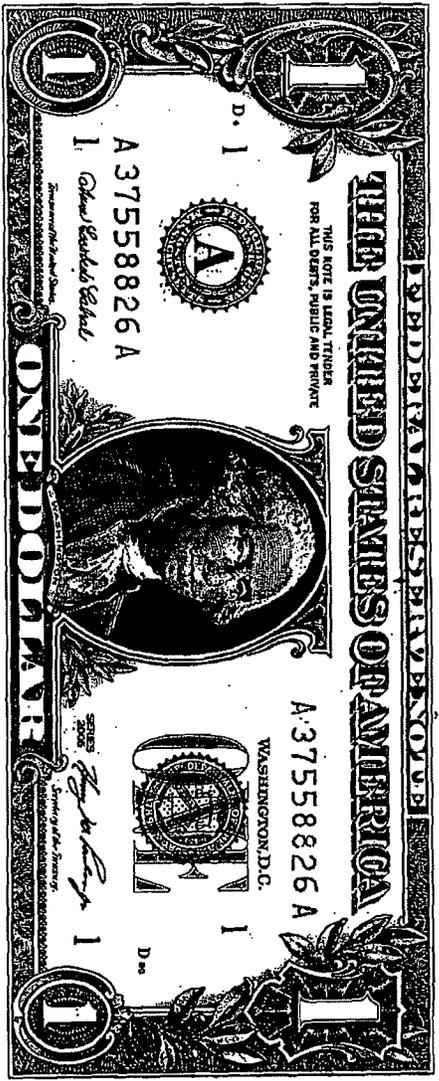
Mrs. Phyllis Woodger
321 Granby Rd.
Granville, MA 01034-9483

Dear Mrs. Woodger,

This is it. The last push to make John McCain President. And the last dollar.

This is the final push and the last opportunity I will have to write you before Election Day, Mrs. Woodger.

And I have sent you this dollar to show you what I need to win this election.



Paid for by National Campaign Fund Political Action Committee, and not authorized by any candidate or candidate's committee.

Contributions are not deductible for federal income-tax purposes. Federal law requires political committees to report the name, mailing address, occupation and name of employer for each individual whose contributions aggregate in excess of \$200 in a calendar year.

Occupation: _____

Employer: _____

Mailing Address: _____

Check if Retired

Check if Homemaker

Self-Proprietorship Business



NATIONAL CAMPAIGN FUND

Harry Reid, the majority leader of the do-nothing Senate... he not long ago summed up his feelings about our nominee. He said, quote, "I can't stand John McCain." Clearly, what the majority leader was driving at is that he can't stand up to John McCain and that is only... one more reason to take the maverick out of the Senate and put him in the White House.

~SARAH PALIN, GOP VICE PRESIDENTIAL NOMINEE

October 24, 2008

Mrs. Phyllis Woodger
321 Granby Rd.
Granville, MA 01034-9483

Dear Mrs. Woodger,

This is it. The last push to make John McCain President. And the last dollar.

This is the final push and the last opportunity I will have to write you before Election Day, Mrs. Woodger.

And I have sent you this dollar to show you what I need to win this election.

I will be working close to around the clock to push Senator John McCain and the Republican Party OVER THE TOP on November 4th.

But I cannot do it alone, Mrs. Woodger.

Advertising in key states is expensive.

That is why I am turning to you in this final hour – asking you to help push Senator John McCain over the top.

That is why I am rushing this letter and this dollar and why I am providing you with a Postal Priority Letter Service envelope for you to respond...

...don't worry about the return postage – I have already paid it.

It is that urgent, Mrs. Woodger.

Right now, as I write this letter, I am pouring over polls from all over the country...

...polls that show the margin of difference between Senator John McCain and Barack Obama as negligible...

...it's a dead heat, Mrs. Woodger.

There are some polls that say that Election 2008 will come down to mere thousands of votes – hundreds in some districts.

Paid for by the National Campaign Fund Political Action Committee, and not authorized by any candidate or candidate's committee.

1101 Pennsylvania Ave., NW, Suite 600, Washington, DC 20004
Phone: (202) 756-4578 www.nationalcampaignfund.com www.helpjohnmccain.com

5
And the Democratic Party is still courting the swing vote – attempting to use grassroots efforts and operatives on the ground in specific counties to plaster voting areas with pro-Obama literature...

...they have grassroots organizations in place in every hotly contested state, with thousands of volunteers ready to be outside voting places with billboards, literature – swaying last minute swing voters.

And the liberal media is entirely on-board with the program.

As I write this letter, I have been horrified to watch national news broadcasters clearly attempting to sway people to vote for Barack Obama.

Many news channels are acting like Barack Obama has already been elected – they have already anointed him king – as if they could do such a thing.

And the attacks on Senator John McCain have been vicious – Internet liberal special interest groups have been working around the clock to smear Senator John McCain's impeccable record and tarnish his honorable character.

They are working overtime because it is virtually impossible to smear Senator John McCain and manipulate his stellar record.

How do you smear the record of someone who has served our nation faithfully his entire life?

How do you manage to attack the reputation of a man who served in the United States Navy for 27 years, with a record of heroism?

How do you tarnish the reputation of a man who has reached across the aisle of the House and Senate to broker deals for progress – passing legislation that NO OTHER POLITICIAN COULD ENACT?!

Make no mistake, the liberals are scared.

That is why they are pumping in every last dollar – desperate to turn the election in the final hours.

Big Unions have put record amounts of campaign cash into the Obama campaign and now they are pumping in a final influx of cash to put Obama over the top, using the power of their rosters to move him on Election Day.

Hollywood has come forward in record numbers to hold massive fundraising dinners for Barack Obama – looking to fill his campaign coffers with every penny for the FINAL PUSH into Election Day.

And liberal special interest groups have rallied for Obama – looking to put every dollar into his pocket to push him OVER THE TOP.

The Democratic strategy right now is clear:

- 6
- *Attack Senator John McCain using the liberal media to smear his reputation and attack his record in the final hours of Election 2008.*
 - *Get operatives on the ground in key battleground states – looking to Get Out the Vote and saturate voting areas with pro-Obama messages.*
 - *Take in record amounts of campaign cash in the final hours of Election 2008 – looking to use every penny to pave Barack Obama's road to victory.*

They are scrambling. Why?

Because they are afraid.

Senator McCain has made up critical ground in the last two months – closing a gap that the Obama campaign wanted to keep in place until Election Day.

John McCain and the Republican message has resonated with voters across the United States – especially with new foreign policy crises that have emerged.

And, when Senator Joe Lieberman, the 2000 Democratic Vice Presidential candidate agreed to speak at the Republican National Convention – to make it clear that our entire nation should be supporting John McCain for president...

...the Democrats got even more desperate.

They know the writing is on the wall. Right now we have momentum.

Now, I am asking you to help take John McCain and our Republican leadership OVER THE TOP on Election Day.

I am asking you to step forward and shape history.

I am asking you to interrupt the Democratic strategy for victory.

And I am urging you to stand solidly with the GOP and with John McCain until he emerges victorious.

I know that I am asking a lot.

With great power comes great responsibility. I am asking you to be a proud Republican and to live into the responsibility of that commitment in these final days.

Please help The National Campaign Fund close any final gap.

Please help push John McCain OVER THE TOP.

And please help our Republican leadership surge to victory in the House and Senate...

...giving President McCain the power to enact legislation rather than be paralyzed by a Democratic-controlled Congress.

That is why I am asking you to rush your generous contribution of \$100, \$500, \$1,000 – even \$2,500 if possible.

A final \$1,000 contribution right now could be the difference between key advertising being put up in critical battleground states – or not.

\$2,500 could help put operatives on the ground in counties throughout the nation – combating the Obama flood of Big Union supporters.

Every penny – every dollar will help to combat the Democratic strategy to defeat John McCain and could push the GOP and John McCain over the top.

Please, Mrs. Woodger. This is our final shot.

If you at all care about your Republican values, our nation and the future, then please be willing to make a final sacrifice today.

I know that you do care – that is why I am rushing this final letter to you. Please use the Postal Priority Letter Service envelope that I've sent with postage already paid to rush your final contribution – your final say in Election 2008. Thank you.

Awaiting your urgently-needed help,

Floyd D. Brown

Floyd Brown, National Chairman

Urgent Response to Floyd Brown

YES! I will give a final donation to push Senator John McCain and our GOP OVER THE TOP. To help in this final push to Republican victory in Election 2008, I am rushing my generous contribution of:

[] \$100 [] \$500 [] \$1,000 [] \$2,500 [] \$_____ Other

Please rush this reply in the provided postage paid envelope with your check to:
The National Campaign Fund
P.O. Box 96639, Washington, D.C. 20090-6639

Designation: () Good Samaritan () Flying Ace () Bronze Star () Silver Star

Mrs. Phyllis Woodger
321 Granby Rd.
Granville, MA 01034-9483

01034WDGR321P20 8NBJ6A1

Phone #: _____

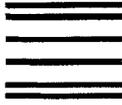
e-Mail: _____

Please see the enclosed card for important information about NCF.

IF YOU WISH TO CONTRIBUTE VIA CREDIT CARD,
PLEASE COMPLETE THE FOLLOWING:

TYPE OF CARD: VISA MasterCard
 AmEx Discover

Amount of Gift _____
Credit Card Number: _____
CVV Number _____
(3 digit number on back of Master Card, Visa, Discover
and on the front of American Express cards.)
Exp. Date: _____
Name as it Appears on Card: _____
Signature: _____
Date of Authorization: _____
Credit card donations will appear on your monthly
statement as "NCF."



NO POSTAGE
NECESSARY
IF MAILED
IN THE
UNITED STATES



POSTAL PRIORITY LETTER SERVICE

8NBJ6

BUSINESS REPLY MAIL
FIRST CLASS PERMIT NO. 2028 WASHINGTON, D.C.

POSTAGE WILL BE PAID BY ADDRESSEE

NATIONAL CAMPAIGN FUND
P.O. BOX 96639
WASHINGTON, D.C. 20077-7352



(A09-26) (National Campaign Fund)
Statement of Vice Chair Weintraub and Commissioners Walther and Bauerly

Attachment C

EXPOSEOBAMA.COM

National Campaign Fund
PO Box 96713 • Washington, DC 20090-6713

AUGUST 2008

S	M	T	W	T	F	S
03	04	05	06	07	08	09
10	11	12	13	14	15	16
17	18	19	20	21	22	23
24	25	26	27	28	29	30
31						

SEPTEMBER 2008

S	M	T	W	T	F	S
01	02	03	04	05	06	
07	08	09	10	11	12	13
14	15	16	17	18	19	20
21	22	23	24	25	26	27
28	29	30				

OCTOBER 2008

S	M	T	W	T	F	S
05	06	07	08	09	10	11
12	13	14	15	16	17	18
19	20	21	22	23	24	25
26	27	28	29	30	31	

NUF K-S44

Three Envelopes



August 18, 2008

To: Jiemin Hool
 185 Arsenal St
 Watertown, MA 02472-2773

Dear Fellow American,

I have enclosed a special envelope for each of the three months remaining between now and Election Day.

There is one each for August, September and October.

On each envelope, there is a "deadline date" circled in red: August 20, September 12 and October 3.

And without wasting anymore time, let me get right to the point.

As you know, I am the conservative Republican activist who is best known for the 1988 "Willie Horton" TV ad.

And I will always be proud of the role that ad and I played in helping to spare the nation from a "President Michael Dukakis".

But, as bad as that would have been for the country, the specter of a "President Barack Hussein Obama" is worse. Much worse!

Which is why I have formed "Expose Obama"...

... and why I urgently need you to mail back a special and needed donation of \$20 by no later than each of the "deadline dates" circled on the enclosed return envelopes.

For example, I ask you to use the "August" envelope to send Expose Obama another gift of \$20 no later than August 20...

... the "September" envelope to send a gift of \$20 no later than September 12,

... and the "October" envelope to send a gift of \$20 no later than October 3 -- roughly one month before Election Day.

That's a total of \$60 to ensure that we can run hard-hitting, no-nonsense TV ads exposing the REAL Barack Hussein Obama to the American

Over, please...

*Paid for by the National Campaign Fund and not authorized by any candidate or candidate's committee.
 ExposeObama.com is a project of the National Campaign Fund.*

people as often as possible, right up to Election Day.

If you could send the entire amount -- or more -- all at once in the August envelope, that would give us and our Expose Obama campaign a real head start for the hectic months to come after Labor Day and the Conventions are over.

But, one way or another, to help ensure that we can pound the truth out about Obama each and every day between now and November 4...

... we are going to need an extraordinary amount of help from you and my other key nationwide supporters...

... and here's why.

As I speed you this urgent appeal, Barack Obama is leading in almost every national poll of consequence.

He is flush with a massive campaign money machine.

He is adored by the biased liberal "mainstream" media.

And he is about to get an even bigger boost from the upcoming Democratic National Convention in Denver.

But the truth is BARACK HUSSEIN OBAMA IS THE MOST-DANGEROUS Presidential candidate EVER to emerge as a serious contender.

Yet, the McCain campaign is either unwilling or unable to say and do what must be done to expose Obama for the true dangerous leftist he really is.

But with your help, we can and we will.

In fact, we have already produced and aired three different TV ads exposing some of the dark truths that CBS News, The New York Times, MSNBC and TIME magazine won't talk about...

... from Obama's lies about his Muslim roots to his soft-on-crime record to his not so hidden scheme to fully open our borders and grant amnesty to illegal aliens,

... and you can view these ads right after reading this letter by going to our website, www.exposeobama.com.

But, in the critical days and weeks to come through the Convention and Labor Day and throughout the fall we will need to do more.

Much more.

Which is why I went to the extraordinary step of sending you not one -- but three -- return envelopes today.

Each is important.

Next page, please...

Your August 20 envelope will ensure that we have the resources ready to air TV ads during both the Democratic Convention in Denver and the GOP Convention in St. Paul.

Your September 12 envelope will help us ensure that we can air ads countering the lift Obama will get from both his Convention and from his post-Labor Day campaign kick-off.

And finally, your October 3 envelope will give Expose Obama and me the reserve funds we will need to ensure that we can run ads right up until midnight on November 3, the day before Election Day.

Now, I know all this can appear very complicated.

But I am confident that you understand the extraordinary financial and political battle we are now waging to expose the real socialist Barack Hussein Obama to the American people.

Yes, he looks good and gives a wonderful sounding speech.

And yes, he talks about "hope" and "change" as if those words alone will solve all of our nation's and the world's ills.

But again, Barack Hussein Obama is without question the most-liberal and the most-dangerous major candidate to EVER run for President of the United States.

And frankly, we fail to prevent his election at our own peril!

Because if elected, "President Obama" will:

- ** surrender and retreat from Afghanistan and Iraq;
- ** make us vulnerable to new attacks from Islamic terrorists;
- ** appease Iran, Syria, Venezuela, Cuba and other hostile countries;
- ** disarm our military;
- ** fully open our borders and grant amnesty to illegal aliens;
- ** raise crippling taxes on the middle class and business;
- ** enact government run-and-rationed health care;
- ** appoint leftist and activist Judges to the Supreme Court; and
- ** raise the payroll tax on millions of middle class workers.

We plan to run hard-hitting ads on these and other critical issues between now and Election Day.

We are doing so because we firmly believe that once the American people fully understand that THIS is the "change" Barack Obama "hopes" to bring to the nation...

... he will never see the light of day in the Oval Office!

But John McCain has vowed that he will not run any such ads.

And we cannot count on the liberal media (which worships the ground

Over, please...

Obama walks on) to tell the real story.

In short, it is up to us to fully expose Barack Obama for the true leftist he is.

It won't be easy. Or cheap.

I know because I've been down this road before.

And I know that an effective TV ad campaign exposing the truth about Barack Hussein Obama will cost a minimum of \$20 million.

A lot of money, yes.

But not when one considers the consequences of a "President Barack Hussein Obama".

Again, he may well be the greatest threat our nation has ever faced.

John McCain and the Republicans either can't or won't say so.

But, with your continued support we can, we will and we are...

... all across the nation's TV airwaves.

So please, without any delay:

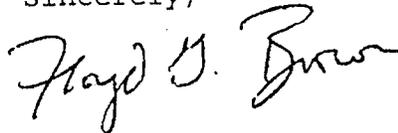
- use the August envelope to send \$20 by August 20;
- use the September envelope to send \$20 by September 12; and
- use the October envelope to send \$20 by October 3.

If you could send the entire \$60 today in the August envelope, God bless you, that would be terrific.

But please, try to send at least \$20 today.

I know you understand the need. And I know I can count on you.

Sincerely,



Floyd Brown
Chairman

P.S. I will be contacting you from time to time between now and October 3 to give you an update on the progress of our Expose Obama TV ad campaign. I will also use those opportunities to give you an update on our financial situation. But please, I need to count on you to remember when to return each of the enclosed envelopes.

So please, after you have mailed off August's gift of \$20 or more, put the other two envelopes in a place where you'll remember to pull them out each month at the appropriate time. Thank you.

CREDIT CARD INFORMATION:

For your protection: The address you provide should be the same as the billing address of your credit card.

Type of credit card:



Credit Card Number: _____

Exp Date: ____/____/____ Amount: \$ _____ V-code (last 3 or 4 digits on back of card): _____

Name as it appears on the card (please print): _____

Signature: _____

Contributions are only used in Federal elections. Contributions are limited to \$5000.00 per calendar year from an individual. Federal law requires political committees to report the name, address, occupation and name of employer for each individual whose contributions aggregate in excess of \$200 in a calendar year. Contributions may only be accepted from United States citizens at least 18 years of age. Contributions must be made from an individual's personal funds and cannot be made from the general treasury funds of a corporation, labor organization, national bank or from the general treasury of an entity or person who is a federal contractor. Funds cannot be provided to a contributor by another person or entity for the purpose of making a contribution.

CREDIT CARD INFORMATION:

For your protection: The address you provide should be the same as the billing address of your credit card.

Type of credit card:



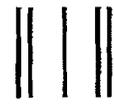
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Exp Date: ____/____/____ Amount: \$ _____ V-code (last 3 or 4 digits on back of card): _____

Name as it appears on the card (please print): _____

Signature: _____

PLACE
STAMP
HERE



FIRST CLASS

FIRST CLASS

ATTENTION:

PLEASE RETURN NO
LATER THAN OCTOBER 3

OCTOBER 2008						
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25	26	27	28	29	30	31

NATIONAL CAMPAIGN FUND
PO BOX 96713
WASHINGTON, DC 20090-6713



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FIRST CLASS

FIRST CLASS

ATTENTION:

PLEASE RETURN NO
LATER THAN SEPTEMBER 12

SEPTEMBER 2008						
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29	30					

NATIONAL CAMPAIGN FUND
PO BOX 96713
WASHINGTON, DC 20090-6713



PLACE
STAMP
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FIRST CLASS

FIRST CLASS

ATTENTION:

PLEASE RETURN NO
LATER THAN AUGUST 20

AUGUST 2008						
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24	25	26	27	28	29	30
31						

NATIONAL CAMPAIGN FUND
PO BOX 96713
WASHINGTON, DC 20090-6713

(A09-26) (National Campaign Fund)
Statement of Vice Chair Weintraub and Commissioners Walther and Bauerly

Attachment D

K-1152

PLEASE PROOF
& RETURN TO
REBECCA

NCF - Obama global Tax A

NH CP AP

 **EXPOSEOBAMA.COM**

National Campaign Fund
PO Box 96713 - Washington, DC 20090-6713

It will cost each U.S. taxpayer roughly \$9,300.

Will you help us stop Senator Barack Obama's "Global Tax Bill" here in 2008?

AND HELP KEEP HIM FROM BECOMING "PRESIDENT" BARACK OBAMA IN 2009?

[Empty rounded rectangular box for name and address]

SEE INSIDE FOR DETAILS

FPO do not print



EXPOSEOBAMA.COM

Dear Fellow American,

I urge you to sign the enclosed "NO GLOBAL POVERTY TAX PETITION" and to speed it back to me today.

Your Petition is addressed to the United States Senate. And it urges the Senate to REJECT S.2433, the "Global Poverty Act"...

... Senator Barack Obama's bill that will force U.S. taxpayers to pay 0.7 percent of our GNP towards the goal of "reducing global poverty by 2015."

The 0.7 percent may not sound like much. But when multiplied by our projected GNP by 2015, it adds up to a whopping \$845 billion.

That's \$200 million more than last year's entire budget for Social Security twice as much as next's year entire budget for the Pentagon.

It's also roughly \$9,300 for every taxpayer in the United States.

And that's just a conservative estimate! In reality, our total Obama/U.N. tax bill to help "reduce global poverty" will almost certainly be much higher. And there is only one way to come up with almost a trillion additional U.S. dollars...

... and that way is a global tax that will come out of your pocket and mine!

~~It might come in the form of a "global carbon tax" which could quadruple the cost of an already expensive gallon of gasoline. Or, it could come in the form of an outright "global income tax."~~

But one thing is certain: If Obama's "Global Poverty Act" passes, one way or another...

WE WILL SOON BE PAYING TAXES TO THE GLOBAL COMMUNITY!

This is the kind of "change" Obama and his socialist supporters "hope" to bring to the United States. And frankly, we allow him and his leftist policies into the White House at our nation's peril!

Which is why, in addition to helping us defeat Obama's "Global Poverty Act" today...

... I also hope you will agree to help us defeat his bid for the White House in November,

Over, please...

*Paid for by the National Campaign Fund and not authorized by any candidate or candidate's committee.
ExposeObama.com is a project of the National Campaign Fund.*

... and I'll explain how you can do just that in a moment.

But first, please, sign the enclosed "NO GLOBAL POVERTY TAX PETITION" and speed it back to me today without delay. Once it arrives back in our hands, your Petition will be bundled up with tens of thousands more that we will soon be receiving from all over the nation.

They will then be shipped in wave after wave to the Senate until we are sure we have killed this bill dead in the 110th Congress! And make no mistake: Obama's S.2433, "Global Poverty Act" must never see the light of day. If enacted, it would require the President,

"to develop and implement a comprehensive strategy to further the United States foreign policy objective of promoting the reduction of global poverty, the elimination of extreme global poverty, and the achievement of the Millennium Development Goal of reducing by one-half the proportion of people worldwide, between 1990 and 2015, who live on less than \$1 a day."

The "Millennium Development Goal" referred to in the above excerpt from Obama's bill, is a utopian United Nations decree which we have, thus far, ignored -- and for good reason.

Because poverty is a fact of life and no draining of our pocket-books is going to eradicate it in our lifetime. Thanks to war, disease, corruption, famine, draught and tyranny there will always be areas of poverty in the world. *draught*

And anyone who thinks government can create wealth should look no further than Lyndon Johnson's failed \$3 trillion "war on poverty" in the 1960s.

That boondoggle created more poverty not less -- and it's negative consequences can still be seen today in ghetto after ghetto across the United States.

And the irony is, most of the leftist bureaucrats at the United Nations fully understand this. Which is why their real goal is not to "reduce global poverty"...

... but rather, to transfer the wealth and sovereignty of the United States to the coffers of the U.N. and Third World tyrants!

Of course, the fact that leftist anti-American U.N. globalists want your dollars and mine is no surprise.

But what is a surprise is the fact that BARACK OBAMA ACTUALLY BELIEVES HIS BILL WILL ELIMINATE GLOBAL POVERTY BY 2015!

It will of course, do no such thing. But it WILL help bankrupt the United States. And this reckless, naive and foolhardy Obama bill is just one more reason why we must, AT ALL COSTS...

... make sure Barack Hussein Obama is NEVER elected President of the United States!

ole

I hope you agree. And I hope that in addition to signing and returning your "NO GLOBAL POVERTY TAX PETITION," you will also agree to help me do what John McCain and the Republicans will not or can not do to ensure that American voters know the WHOLE truth about Barack Obama...

... I hope you will help us fund a massive national TV ad campaign that will, piece by piece,

... fully expose Obama's dangerous socialist agenda which will bankrupt the United States, erode our liberty and abandon our security.

We have already begun this campaign. And you can see our initial ad right now on our website www.ExposeObama.com.

But first, I hope you will use the enclosed preaddressed return envelope to speed back your signed Petition and the most-generous gift you can send today.

Because time is short and the idea of a "President Barack Hussein Obama" may well be the greatest threat our nation has ever faced.

~~John McCain and the Republicans either can't or won't say so. But we can and we will -- all across the nation's TV airwaves.~~

My name is Floyd Brown. And I am the conservative Republican activist who is best known for the 1988 "Willie Horton" TV ad.

I will always be proud of the role that ad and I played in helping to spare the nation from a "President Michael Dukakis." But, as bad as that would have been for the country, the specter of a "President Barack Hussein Obama" is worse. Much worse!

Yes, he looks good and gives a wonderful sounding speech. And yes, he talks about "hope" and "change" as if those words alone will solve all of our nation's and the world's ills.

But the truth is BARACK HUSSEIN OBAMA IS THE MOST-DANGEROUS Presidential candidate EVER to emerge as a serious contender. And unless we take this threat seriously -- he can and will win.

That's why I formed "Expose Obama." And why, with your help today, we plan to run a series of hard-hitting, no-nonsense TV ads exposing the REAL Barack Hussein Obama.

Thanks to Sean Hannity, Rush Limbaugh and my friends on conservative talk radio, most voters are already aware of Obama's relationships with the hate-filled, anti-American Reverend Jeremiah Wright, with Louis Farrakhan and with terrorist bomber William Ayers of the 1960s terrorist group Weather Underground.

And make no mistake: Expose Obama plans to continue to remind voters about these truths between now and Election Day.

But what the American people really need to learn are the details of the radical, dangerous and socialist policies that Barack Hussein Obama would unleash on this nation if he wins in November -- and our summer and

Over, please...

fall TV ad series will do just that.

Our first ad exposed how then-State Senator Obama led the fight against the death penalty for ruthless gangland assassins in Illinois.

Future ads we are planning will expose how a "President Obama" will:

- ** impose global taxes on America (the "Global Poverty Act");
- ** disarm our military and appease our radical Islamic enemies;
- ** fully open our borders and grant amnesty to illegal aliens;
- ** enact government run-and-rationed health care;
- ** appoint leftist and activist judges to the Supreme Court; and
- ** raise the payroll tax on millions of middle class workers.

We are convinced that once the American people fully understand that THIS is the "change" Barack Obama "hopes" to bring to the nation, he will never see the light of day in the Oval Office!

But John McCain has vowed that he will not run any such ads. And we cannot count on the liberal media (which worships the ground Obama walks on) to tell the real story. (After all, had you heard of Obama's "Global Poverty Act" before reading this letter?)

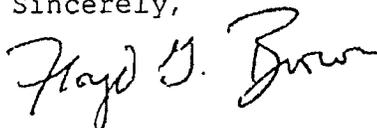
In short, we need to unite right-here-and-now to defeat Obama's "Global Poverty Act" today and make sure there is not a "President" Barack Hussein Obama tomorrow.

It won't be easy. Or cheap. I know because I've been down this road before. And I know that an effective TV ad campaign exposing the truth about Barack Hussein Obama will cost a minimum of \$20 million.

✓ So please, sign your "NO GLOBAL POVERTY TAX PETITION." Then rush it and a most-generous and urgently needed gift of \$20, \$25, \$35, \$50, \$75, \$100 or more to Expose Obama today.

Thank you. And may God help us at this crucial point in history.

Sincerely,



Floyd Brown
Chairman, Expose Obama

P.S. This petition campaign is a double-edge sword that we can use against the Obama Presidential campaign. One side, your "No Global Poverty Tax Petition" will help us defeat this reckless bill, AND expose Obama's globalist agenda. The other side, your much-needed donation of \$20, \$25, \$35, \$50, \$75, \$100 or more will help us make sure this issue and others that tell the real truth about Obama are blasted all over the nation's TV airwaves between now and Election Day. But time is short and the stakes are high so please, respond now -- TODAY!

P.P.S. A \$9,300 global tax bill for each and every taxpayer in the United States. That's the projected cost of Obama's "Global Poverty Act." And with your help today, we plan to ensure that each of those taxpayers knows what to expect from a "President Obama" BEFORE they go to the polls on Election Day.

CREDIT CARD INFORMATION:

For your protection: The address you provide should be the same as the billing address of your credit card

Type of credit card:    

Credit Card Number _____

Exp Date. _____ Amount. \$ _____ V-code (last 3 or 4 digits on back of card): _____

Name as it appears on the card (please print) _____

Signature _____

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