

EXHIBIT 6

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FEC
FORM 1

STATEMENT OF ORGANIZATION

Office Use Only

1. NAME OF COMMITTEE (in full) ☐ (Check if name is changed) Example: If typing, type over the lines.

12FE4M5

B a c h m a n n , f o r P r e s i d e n t ,

ADDRESS (number and street) P . O . B o x , 2 5 1 3 1 0

- ☐ (Check if address is changed)

W o o d b u r y , M , N 5 5 1 2 5 -

CITY

STATE

ZIP CODE

COMMITTEE'S E-MAIL ADDRESS (Please provide only one e-mail address)

- ☐ (Check if address is changed)

@ r o b e r t w a t k i n s . c o m

COMMITTEE'S WEB PAGE ADDRESS (URL)

- ☐ (Check if address is changed)

w w w . m i c h e l e b a c h m a n n . c o m

2. DATE

0 6 / 0 8 / 2 0 1 1

3. FEC IDENTIFICATION NUMBER

C

4. IS THIS STATEMENT ☒ NEW (N) OR ☐ AMENDED (A)

I certify that I have examined this Statement and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer Nancy H. Watkins

Signature of Treasurer

Nancy H. Watkins

Date

0 6 / 0 8 / 2 0 1 1

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. §437g.

ANY CHANGE IN INFORMATION SHOULD BE REPORTED WITHIN 10 DAYS.

Office
Use
Only

For further information contact:
Federal Election Commission
Toll Free 800-424-9530
Local 202-694-1100

FEC FORM 1
(Revised 02/2009)

11030612604

13-1274_0037

5. TYPE OF COMMITTEE

Candidate Committee:

- (a) ☒ This committee is a principal campaign committee. (Complete the candidate information below.)
- (b) ☐ This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)

Name of Candidate M i c h e l e , B a c h m a n n

Candidate Party Affiliation REP Office Sought: ☐ House ☐ Senate ☒ President State District

- (c) ☐ This committee supports/opposes only one candidate, and is NOT an authorized committee.

Name of Candidate

Party Committee:

- (d) ☐ This committee is a (National, State or subordinate) committee of the (Democratic, Republican, etc.) Party.

Political Action Committee (PAC):

- (e) ☐ This committee is a separate segregated fund. (Identify connected organization on line 6.) Its connected organization is a:
- ☐ Corporation ☐ Corporation w/o Capital Stock ☐ Labor Organization
- ☐ Membership Organization ☐ Trade Association ☐ Cooperative
- ☐ In addition, this committee is a Lobbyist/Registrant PAC.
- (f) ☐ This committee supports/opposes more than one Federal candidate, and is NOT a separate segregated fund or party committee. (i.e., nonconnected committee)
- ☐ In addition, this committee is a Lobbyist/Registrant PAC.
- ☐ In addition, this committee is a Leadership PAC. (Identify sponsor on line 6.)

Joint Fundraising Representative:

- (g) ☐ This committee collects contributions, pays fundraising expenses and disburses net proceeds for two or more political committees/organizations, at least one of which is an authorized committee of a federal candidate.
- (h) ☐ This committee collects contributions, pays fundraising expenses and disburses net proceeds for two or more political committees/organizations, none of which is an authorized committee of a federal candidate.

Committees Participating in Joint Fundraiser

1.	<u> </u>	FEC ID number	<u>C</u>
2.	<u> </u>	FEC ID number	<u>C</u>
3.	<u> </u>	FEC ID number	<u>C</u>
4.	<u> </u>	FEC ID number	<u>C</u>

11030613605

Write or Type Committee Name

Bachmann for President

6. Name of Any Connected Organization, Affiliated Committee, Joint Fundraising Representative, or Leadership PAC Sponsor

None

Mailing Address

CITY

STATE

ZIP CODE

Relationship: ☐ Connected Organization ☐ Affiliated Committee ☐ Joint Fundraising Representative ☐ Leadership PAC Sponsor

7. Custodian of Records: Identify by name, address (phone number -- optional) and position of the person in possession of committee books and records.

Full Name

Nancy H. Watkins

Mailing Address

610 S. Boulevard

Tampa FL 33606

Title or Position

CITY

STATE

ZIP CODE

Treasurer

Telephone number 813-254-

8. Treasurer: List the name and address (phone number -- optional) of the treasurer of the committee; and the name and address of any designated agent (e.g., assistant treasurer).

Full Name
of Treasurer

Nancy H. Watkins

Mailing Address

610 S. Boulevard

Tampa FL 33606

Title or Position

CITY

STATE

ZIP CODE

Treasurer

Telephone number 813-254-

11030613606

Full Name of
Designated
Agent

R o b e r t I . W a t k i n s

Mailing Address

6 1 0 S . B o u l e v a r d

T a m p a F L 3 3 6 0 6 -

CITY

STATE

ZIP CODE

Title or Position

A s s i s t a n t T r e a s u r e r

Telephone number

8 1 3 - 2 5 4 - 3 3 6 9

8. **Banks or Other Depositories:** List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of Bank, Depository, etc.

T h e B a n k o f T a m p a

Mailing Address

6 0 1 B a y s h o r e B l v d .

T a m p a F L 3 3 6 0 6 -

CITY

STATE

ZIP CODE

Name of Bank, Depository, etc.

N o r t h S t a r B a n k

Mailing Address

4 0 0 N . A s h l e y D r i v e

T a m p a F L 3 3 6 0 2 -

CITY

STATE

ZIP CODE

11030613607

EXHIBIT 7

FUNDRAISING CONSULTING CONTRACT

This Contract is entered into as of this 13th day of July, 2011 by and between the Bachmann for President (hereinafter "the BFP"), a Minnesota nonprofit corporation located at PO Box 251310, Woodbury, MN 55125, and C&M Strategies, whose principal place of business is located at 1617 Parkdale Circle North, Engle, CO 80516 ("Consultant") (collectively "the Parties").

WITNESSETH:

WHEREAS, Consultant is in the business of providing political and fundraising management services to federal campaign committees; and

WHEREAS, the BFP desires to engage Consultant for performance of above said fundraising management services for the BFP;

NOW, THEREFORE, in consideration of the foregoing and the mutual covenants set forth herein, and for other good and valuable consideration, receipt and sufficiency of which is hereby acknowledged, the Parties agree as follows:

ARTICLE I -- DUTIES OF CONSULTANT

Fundraising Services Provided. Consultant covenants and agrees to provide to the BFP the following services: political consulting services and manage low dollar fundraising services, including direct mail, phone, on-line fundraising activities, and assist with coordinating high-dollar fundraising activities and events, for the BFP. These services shall hereafter be referred to as the "Fundraising Services".

A. **Directives.** In performing its duties, Consultant shall routinely consult with and otherwise report to the BFP National Campaign Director and Deputy Campaign Manager, or the representative otherwise designated by BFP regarding the performance of the Fundraising Services. Any questions regarding Consultant's performance of the Fundraising Services under this Contract shall be addressed to the BFP designated authorized agents identified above. Notwithstanding anything in the foregoing, it is expressly understood and agreed that Consultant is an independent contractor and is not an employee of the BFP.

C. **Compliance Responsibilities.** Consultant represents to BFP that it is knowledgeable of the compliance and legal obligations of the BFP pursuant to the Federal Election Campaign Act of 1971, as amended, and Federal Election Commission regulations (collectively "the Act"), and agrees to comply with the provisions of the Act in all respects applicable to the performance of the Fundraising Services under this Contract and to consult with BFP legal counsel in the event Consultant has questions regarding the application of any provision of the Act to the Consultant's fundraising services for the BFP.

ARTICLE II -- TERM; TIME OF THE ESSENCE

A. Consultant agrees to provide the services set forth in Article I during the period from ~~July~~, 2011 to December 31, 2011.

B. Given the nature of the services rendered, Consultant expressly acknowledges that time is of the essence.

ARTICLE III -- COMPENSATION

A. **Compensation.** For successful performance of the duties described in Article I, the BFP agrees to pay Consultant a monthly retainer of \$22,500 payable on the first day of each month during the term of this Contract.

B. **Expense Reimbursement.**

1. Reimbursement for ordinary expenses such as long distance, copies, postage, etc. shall be made paid within sixty (60) days of being incurred by Consultant upon presentation to BFP of invoices with original receipts and documentation of costs/expenses incurred. Consultant's expenses under this Contract shall be invoiced without mark-up. Consultant also agrees to obtain prior approval for any travel and/or other incidental expenses. First class travel in any form is not reimbursable and shall be reimbursed only at a coach or other discounted rate.

C. **Mailing of Invoices and Payment on Reimbursement Requests.** All invoices and requests for payments or reimbursements must bear the assigned BFP Commitment Form number, project number, and detailed information including, but not limited to, name and address listed on check, check number, and check date in order to receive said commission and shall be mailed to:

Bachmann for President
Attn: Nancy Watkins
610 S. Blvd
Tampa, FL 33606

D. **Noncompliance Justifies Nonpayment.** Any expenses, payments or amounts due under this Contract that do not meet the above criteria may not be paid in whole or in part and may be treated as an in-kind contribution to the BFP, or deducted from the compensation otherwise due Consultant, at the sole discretion of the BFP.

ARTICLE IV -- INDEPENDENT CONTRACTOR

A. **Legal Status.** The BFP and Consultant agree that the legal status of Consultant with respect to the BFP is that of independent contractor and not as employee. Consultant is not an agent or a legal representative of the BFP and is not authorized to make any commitments for or to act as an agent of the BFP for any purpose whatsoever. In particular, Consultant may not enter into any legally binding agreement, written or oral, or take any other legal act in the name of the BFP.

B. Liability. Consultant agrees to assume exclusive liability for any and all taxes, assessment, levies or fines which may be deemed owed by it, or to any employee or contractor of Consultant as a result of performance of Fundraising Services pursuant to this Contract.

C. Taxes, Etc. It is understood and agreed that the BFP will not be responsible for the payment or withholding of federal, state, and/or local taxes, payroll taxes, social security taxes, health insurance, unemployment insurance, workman's compensation benefits, and other similar personnel costs incurred by Consultant in connection with this Contract.

ARTICLE V -- INDEMNIFICATION

Consultant shall indemnify and hold the BFP, its employees, directors, officers, agents, and volunteers harmless against and from any and all claims, demands, liabilities, actions, damages, costs, and expenses related thereto (including attorneys' fees, court costs, and other expenses of litigation) and all damages and liabilities of any kind or nature whatever, arising out of or attributable to Consultant's performance or nonperformance under the terms of this Contract.

ARTICLE VI -- CONFIDENTIALITY AND NON-DISCLOSURE; RETURN OF BFP MATERIALS

A. Confidential and Proprietary Information. All matters between the Parties, including but not limited to the provisions of this Contract; BFP mailing or donor lists; individual contribution histories; polling data; financial reports; research; solicitation materials or techniques; and any other materials or methodologies which Consultant, or list owners, if applicable, may come in contact with and/or which are received from or through the BFP, its employees or agents, ("the Materials") are, were and shall remain the proprietary and confidential property of the BFP and shall not be transferred, communicated or delivered to any third party, whether or not for compensation, without the prior express written consent of the BFP's Deputy Campaign Manager.

B. Non-Disclosure. Consultant agrees not to communicate, directly or indirectly, with any member of the news media on behalf of, for, or about the BFP, without the express advance consent of the BFP's Deputy Campaign Manager or the BFP's Communications Director.

C. Return of the Materials. Upon the termination or expiration of this Contract, Consultant agrees to return to the BFP the Materials, and all copies thereof, and to retain no copies thereof.

ARTICLE VII -- CONFLICTS OF INTEREST

A. Other Entities. Consultant shall list as Attachment A to this Contract any other entity, in whatever form, in which Consultant or its principals, agents, or owners has a financial, proprietary, or management interest, and what that interest is, if such other entity has or is expected to have a financial or contractual relationship with the BFP. This disclosure must include any payments received from BFP vendors by Consultant and any payments to BFP vendors by Consultant. Further, Consultant shall provide a list of all political clients with which Consultant works, including, not limited to federal campaign committees, political action committees, political party committees,

and independent or issue advocacy groups. To ensure conflicts of interest do not arise, Consultant is obligated under the terms of this contract to continually update this disclosure with the BFP's legal counsel within one week of changes occurring. Any potential conflicts must be resolved to the satisfaction of the BFP's Deputy Campaign Manager prior to payment of any compensation under this Contract.

B. Gifts. Consultant agrees not to give any gift(s) having a value (or aggregate value) in excess of \$50 in any calendar year to any individual who is employed by the BFP.

ARTICLE VIII -- NON-COORDINATION WITH THIRD PARTIES

A. Consultant warrants and otherwise represents that it is generally familiar with the regulations governing coordinated public communications promulgated by the Federal Election Commission ("FEC") under the Act and further warrants to BFP as follows:

1. Consultant agrees not to infer or otherwise represent that it is acting in any capacity as an agent of the BFP other than for the specific purpose(s) set forth in this Contract;
2. Consultant agrees not to divulge to any other party committee, candidate or other entity any information regarding the needs, activities, plans or projects of the BFP resulting from Consultant's relationship with the BFP pursuant to this Contract;
3. Consultant agrees that under no circumstances will it engage in substantial discussions or become materially involved with any candidate, party committee or other entity for purposes of their making public communications referencing Congresswoman Michele Bachmann resulting from Consultant's knowledge and information concerning the needs, activities, plans or projects of the BFP resulting from this Contract;
4. Consultant agrees that in the event it becomes aware that it is serving as a common vendor to a political party committee, candidate or other entity that sponsors public communications referring to Congresswoman Michele Bachmann, that it will specifically insure that information regarding the needs, activities, plans or projects of the BFP known to Consultant as a result of this Contract is not used by or communicated in any manner to the other political party committee, candidate or other entity.

B. Consultant agrees that breach of this provision may result in termination of this Contract in the sole discretion of BFP and that Consultant shall be liable for any costs, fees, damages, penalties, attorney's fees or other expenses arising from Consultant's breach of this provision.

ARTICLE IX -- OWNERSHIP OF MATERIALS, DAMAGES

A. BFP Exclusive Ownership. Absent any explicit written agreement to the contrary which has been executed between Consultant and the BFP, signed by the BFP's Deputy Campaign Manager and appended hereto, the BFP retains and reserves the rights of exclusive ownership and

use of any copy, product, publication, or any facsimile thereof which may result from Consultant creativity, except for pre-existing materials purchased by Consultant for the BFP. Consultant and the BFP agree that the work described in Article I will be considered a "work for hire" for the purpose of the United States Copyright law, 17 U.S.C. § 101 *et seq.* and that, accordingly, the BFP is the owner of all copyright rights in the work. Consultant hereby assigns any and all property and exclusive ownership rights in Consultant work to the BFP.

B. Authorship. Consultant hereby warrants that it, its agents or its representatives, are the sole authors of work to be produced, developed and/or published under this Contract, and that such work is an original work of Consultant. Consultant further warrants that the work to be produced or performed under this Contract does not infringe upon any copyright or trademark, violate any right of privacy, or contain libelous material; and that Consultant possesses full power to enter into this Contract.

C. Donor Lists. Consultant agrees that all BFP donor lists by whatever name they may be known, and individual contribution histories were, are, and shall remain the exclusive property of the BFP. Consultant agrees that it does not and shall not acquire any property or ownership interest in, or rights with respect to, any BFP donor list, for any reason. Consultant further agrees that neither it nor any of its directors, officers, employees, consultants, or agents will disclose, rent, lease, sell, encumber, or enter into joint ownership agreements concerning any list(s), file(s), information, updates, or enhancement(s) of the BFP in any form, or for the purpose, nor will they retain, duplicate, or use any of such information in any fashion or for any purpose whatsoever. Consultant agrees that any other entity gaining access to the BFP's donor list must execute Exhibit 1, Consultant Confidentiality Agreement Regarding Lists.

D. Damages. Consultant agrees to pay the BFP for Consultant breach, or threatened breach, of any part of paragraph C of this Article the sum of Fifty Thousand Dollars (\$50,000) per occurrence as liquidated damages, in addition to any other remedies the BFP may have, including equitable or injunctive relief, without requiring the BFP to show or prove it sustained actual pecuniary damages.

ARTICLE X -- USE OF BFP NAME

Consultant shall not use the name, insignia or any facsimile thereof of the BFP or its property, without the express written authorization of the BFP's Deputy Campaign Manager.

ARTICLE XI -- THE BFP

The BFP is a Minnesota nonprofit corporation that is registered with the Federal Election Commission as Congresswoman Michele Bachmann's principal campaign committee for President of the United States. Consultant agrees that the directors, officers, employees, and agents of the BFP shall not be personally liable for any debt, liability, or obligation of the BFP. Consultant, like all persons, corporations, or other entities extending credit to, contracting with, or having any claim against the BFP may only look to the funds and property of the BFP for payment of any debt,

damages, judgment, decree, or any money that may otherwise become due or payable to them from the BFP.

ARTICLE XII -- TERMINATION

Notwithstanding Article II of this Contract, either party may terminate this Contract at any time for any reason on fifteen (15) days written notice to the other party. Such written notice shall be deemed sufficient if in writing and delivered by certified mail return receipt requested, or by overnight mail. The notice shall be effective as of the date received. In the event of termination, after payment of all compensation and reimbursement of all properly approved expenses incurred through the fifteenth day subsequent to receipt of such notice, no further liability or any liquidated damages for such termination shall attach to either party.

ARTICLE XIII -- COMPLETE AGREEMENT AND NOTICES

This Contract, Attachment A and Exhibit 1 represent the complete and entire agreement between the BFP and Consultant and completely replaces and supersedes all previous agreements, whether written or oral.

ARTICLE IV -- MODIFICATION OR WAIVER

The failure or omission of the BFP to require strict compliance with the provisions of this Contract by Consultant, or to exercise any of its rights or remedies in any circumstance, shall not constitute a waiver by the BFP of its rights, constitute a precedent, or otherwise affect the interpretation of this Contract. No terms or provisions of this Contract may be amended, waived, or modified except pursuant to a written agreement that expressly references this Contract and is signed by duly authorized representatives of the BFP and Consultant.

ARTICLE XV -- NOTICES

All notices, requests, demands, and other communications under this Contract shall be in writing and shall be deemed to have been duly given if delivered personally or if sent by registered or certified mail, return receipt requested, properly addressed and postage prepaid to the Parties addresses set forth in the Preface of this Agreement or, in the case of invoices and requests for payment or reimbursement, to the address set forth in Article III, Paragraph C.

ARTICLE XVI -- NON-ASSIGNABILITY

This Contract shall not be assigned or subcontracted by Consultant without the prior written consent of the BFP.

ARTICLE XVII -- SUCCESSOR ORGANIZATIONS

Consultant agrees that all provisions of this Contract will be binding on, or inure to the benefit of, any of its successor organizations.

ARTICLE XVIII -- CHOICE OF LAW

The BFP and Consultant agree that the terms of this Contract shall be deemed to be made under, governed by, and construed in accordance with, the laws of the State of Minnesota.

ARTICLE XIX -- ATTORNEYS' FEES

In the event either party must bring suit for any reason under this Contract, the prevailing party shall be entitled to recover from the other party all costs of such suit, including reasonable attorneys' fees.

ARTICLE XX -- HEADINGS

The headings in this Contract are for the sole purpose of convenience of reference and shall not in any way limit or affect the meaning or interpretation of any of the terms or provisions of this Contract.

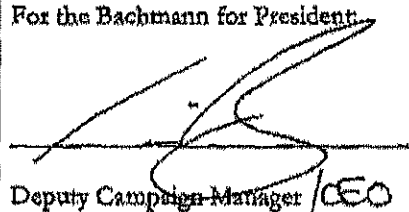
ARTICLE XXI -- SEVERABILITY

If any of the terms or provisions of this Contract are held by a court of competent jurisdiction to be invalid, void, or unenforceable, the remaining terms and provisions shall continue in full force and effect.

ARTICLE XXII -- COUNTERPARTS & FACSIMILE

This Contract may be executed in counterparts, and all counterparts will be considered as part of one Contract binding on all parties to this Contract. This Contract may be executed via facsimile, which signatures shall be deemed legal and binding as an original signature hereto.

IN WITNESS WHEREOF, the parties, acting individually or through their duly authorized officers or representatives, fully understand and execute this Contract, in duplicate original, and agree to be bound by the terms and conditions thereof:

For the Bachmann for President:  Deputy Campaign Manager / CEO 7-7-11 Date	For C&M Strategies: _____ Authorized Agent _____ Date EIN or SSN _____
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ATTACHMENT A

C&M Strategies, a political and fundraising consultant with its principal place of business in located at 1617 Parkdale Circle North, Erie, CO 80516 ("Consultant") shall list any other entity, in whatever form, in which Consultant or its principals, agents, or owners has a financial, proprietary, or management interest, and what that interest is, if such other entity has or is expected to have a financial or contractual relationship with the BFP. This disclosure must include any payments received from BFP vendors by Vendor and any payments to BFP vendors by Vendor. To ensure conflicts of interest do not arise, Consultant is obligated under the terms of this contract to continually update this disclosure with the BFP General Counsel within one week of changes occurring. Any potential conflicts must be addressed to the Deputy Campaign Manager of the BFP prior to any compensation under this contract being paid.

Wiland Direct

Exhibit 1
**CONFIDENTIALITY AGREEMENT REGARDING LISTS & MATERIAL
INFORMATION**

1. For good and valid consideration, the receipt and sufficiency of which is hereby acknowledged, and for the good and valid consideration set forth in the contract by and between C&M Strategies ("Consultant") and Bachmann for President ("BFP"), and as a integral part thereof, Consultant agrees to abide by all terms and conditions of this Contract.
2. Consultant agrees that all BFP donor lists (hereinafter "Lists") by whatever name they may be known and all individual contribution histories were, are, and shall remain the exclusive property of the BFP.
3. Consultant agrees that it does not and shall not acquire any property or ownership interest in or rights with respect to the Lists for any reason.
4. Consultant expressly acknowledges and agrees that the BFP Donor File and all Lists, information, updates, and enhancements thereto which are provided to, generated by, or otherwise become known to Consultant in connection with or incident to this Contract are privileged and confidential.
5. Consultant further agrees that neither it nor any of its directors, officers, employees, vendors, or agents will disclose, rent, lease, sell, or enter into joint ownership agreements concerning any List(s), information, update(s), or enhancement(s) of the BFP in any form, or for any purpose, nor will they retain, duplicate, or use any of such information in any fashion or for any purpose whatsoever.
6. Consultant agrees that all provisions of this Contract will also apply to any of its successor organizations.

For the BFP:

By *Authorized Agent*

CEO / Dep Campaign Mgr 7-7-11
Title Date

For Consultant:

By

Title

Date

EXHIBIT 8

CONFIDENTIAL

Subject to the Nondisclosure Provisions of H. Res. 895 as Amended

OFFICE OF CONGRESSIONAL ETHICS
UNITED STATES HOUSE OF REPRESENTATIVES

MEMORANDUM OF INTERVIEW

IN RE: David Polyansky
REVIEW No(s): 13-1274
DATE: March 20, 2013
LOCATION: Office of Congressional Ethics
425 Third Street, SW, Washington, DC
TIME: 2:12 PM to 3:52 PM (approximate)
PARTICIPANTS: Kedric Payne
Scott Gast
Ron Jacobs, counsel to the witness

SUMMARY: The OCE requested an interview with the witness and he consented to an interview. The witness made the following statements in response to our questioning:

1. The witness was given an 18 U.S.C. § 1001 warning and consented to an interview. The witness signed a written acknowledgement of the warning, which will be placed in the case file in this review.
2. The witness is currently the President of the New Strategies Group, a firm he started in 2007 or 2008, that consults to political and non-profit organizations.
3. Prior to starting his consulting firm, the witness had been employed as the Chief Operating Officer of Mike Huckabee's 2008 presidential campaign. He has also been employed as a political director for other campaigns in the past.
4. The witness began to work for Representative Michele Bachmann's presidential campaign in June 2011, approximately ten days prior to her campaign kick-off announcement. The witness was asked to join the campaign as the deputy national campaign manager by Ed Rollins, who had agreed to serve as national campaign manager.
5. Prior to agreeing to join the campaign, the witness met with Andy Parrish, Representative Bachmann's congressional chief of staff, and Guy Short, a consultant to Representative Bachmann's political committees.
6. During the Bachmann campaign, the witness reported to Mr. Rollins. The witness was tasked with getting the campaign up and running quickly and preparing for the Iowa straw poll. He worked in the campaign's Alexandria, Virginia office and in its Iowa office.
7. The witness did not recall any interactions with the Bachmann for Congress campaign, although he noted that the congressional campaign committee was designated as an authorized committee affiliated with the Bachman for President campaign.

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Subject to the Nondisclosure Provisions of H. Res. 895 as Amended

8. The witness did not recall any interactions with Representative Bachmann's leadership PAC, MICHELE PAC.
9. As deputy campaign manager, the witness worked with campaign legal counsel Bill McGinley, and with Nancy Watkins, who the witness observed handling the day-to-day treasurer duties for the presidential campaign.
10. The witness also worked with campaign consultant Guy Short. The witness described Short's role as a consultant who had known Representative Bachmann for a long time and had worked in Iowa in advance of the campaign's kickoff. The witness believes that Mr. Short had a number of existing relationships in Iowa. The witness believes that Short was became the presidential campaign's national political director after the witness left the campaign.
11. The witness met Rep. Bachmann for the first time after she announced her candidacy for the presidency. They discussed preparing for the Iowa straw poll, which was only about seven weeks off at the time.
12. The witness parted ways with the Bachmann campaign in September 2011, shortly after the Iowa straw poll. He stated that his departure was motivated primarily by a disagreement over campaign strategy, although he also had a young child with whom he wished to spend more time.
13. The witness believes that Mr. Short stayed on with the campaign after the witness departed.
14. Among the witness' duties as deputy campaign manager, he supervised consultants for the campaign. He signed consulting agreements on behalf of the campaign. The witness believes that the presidential campaign's legal counsel drafted the consulting agreements.
15. The witness did not recall how the approval and payment of consultant invoices were administered. When shown various invoices to the presidential campaign from consultant C&M Strategies, the witness could not recall reviewing or approving payment for those invoices. He did not recognize the handwriting on the invoices.
16. The witness did not recall any issues with payments to consultant Guy Short.
17. The witness did not recall any issues pertaining to staff not being paid, although some compensation or expense reimbursements may have been delayed, as in the normal course of a campaign.
18. The witness stated that Representative Bachmann did not have a great deal of involvement with the administrative work of the presidential campaign. The witness stated that he had limited direct communications with Representative Bachmann, which occurred during his time traveling on the campaign bus with her.
19. The witness believes that Andy Parrish and Mr. Short, with whom Representative Bachmann had relationships that pre-existed the presidential campaign, would have kept her informed regarding administrative issues, including the hiring and payment of staff or consultants to the presidential campaign.

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Subject to the Nondisclosure Provisions of H. Res. 895 as Amended

20. The witness was shown a copy of the consultant agreement between the presidential campaign and C&M Strategies, which he signed as deputy campaign manager/CEO of the presidential campaign. The witness did not know how the amount of compensation included in the agreement (\$22,500 per month) was determined. The witness said that Mr. McGinley may have been involved in the issue of compensation for C&M Strategies.
21. The witness did not recall interacting with anyone else associated with C&M Strategies except for Mr. Short.
22. The witness does not know what Mr. Short's compensation was prior to the presidential campaign consulting agreement.
23. The witness said that he was not aware of payments that presidential campaign staff or consultants may have received from other Bachmann political committees.
24. The witness did not recall any conversations with Representative Bachmann about the compensation of any staff or consultants to the campaign.
25. The witness does not recall reviewing any specific provisions of the consulting agreement with Mr. Short. He stated that if questions had come up about the contract language, the witness would have escalated them to the campaign's legal counsel.
26. The witness does not recall discussions with any consultants about potential conflicts. He did recall that there was an issue about a potential conflict involving Mr. Short, but he did not recall discussing the issue with Mr. Short.
27. The witness does not know if Mr. Short worked for MICHELE PAC at the same time he was working for the presidential campaign. The only person the witness recalled working for the PAC is Mr. Parrish.
28. The witness did not recall seeing any invoices related to MICHELE PAC during his employment with the Bachmann presidential campaign.
29. The witness did monitor disbursements made by the presidential campaign during the course of his employment; however, he said he had limited oversight of disbursements related to Mr. Short because of Mr. Short's close relationship with Representative Bachmann.
30. The witness stated that Iowa State Senator Kent Sorenson served as the Iowa state director for the presidential campaign. He said that Mr. Sorenson was close to Mr. Short and believes they may have had a relationship that pre-dated the presidential campaign.
31. The witness stated that Mr. Short brought Mr. Sorenson in to the campaign as a subcontractor.
32. The witness said that it was his understanding that a portion of the \$22,500 paid to Short by the presidential campaign pursuant to his consulting contract was designated for Sorenson. He believes that \$7,500 of the \$22,500 was supposed to go to Sorenson.
33. The witness recalled a "legal discussion" regarding the ability of Mr. Sorenson to accept payment from the presidential campaign. When this issue came up, he consulted with the

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Subject to the Nondisclosure Provisions of H. Res. 895 as Amended

campaign's legal counsel. According to the witness, he was told to go forward with the arrangement with Mr. Short paying Mr. Sorenson as a subcontractor, in the same manner it had been done prior to the BFP campaign.

34. The witness believes, but does not definitively recall, that there was a discussion about having one agreement with Mr. Sorenson and a separate agreement with Mr. Short.

This memorandum was prepared on March 25, 2013 after the interview was conducted on March 20, 2013. I certify that this memorandum contains all pertinent matter discussed with the witness on March 20, 2013.

Scott Gast
Investigative Counsel

EXHIBIT 9

Before the
Office of Congressional Ethics

DECLARATION OF DAVID POLYANSKY

I, David Polyansky, a competent adult of sound mind, hereby declare under penalty of perjury under the laws of the United States of America:

Background

1. I served as the Deputy Campaign Manager for Bachmann for President ("the Campaign") from early June 2011 until early September 2011.

Compensation of Mr. Guy Short

2. To the best of my recollection, there was an ongoing dialogue with Mr. Short over the amount he would be paid per month by the Campaign. I was adamant that the monthly amount for his services would be no higher than \$12,000 to \$15,000 per month. My recollection is that this was the estimated initial amount that Mr. Short had indicated was required for him to serve in a leadership role in the Campaign – a role that was not of my choosing and was based on his relationships that existed well in advance of my arrival.
3. In my discussions with Mr. Short, my position was based on my own compensation as a senior campaign advisor and on Mr. Short's status as an independent contractor, and not an employee, who would not be required to be permanently based at the Campaign's headquarters. I recall that Mr. Short proposed various amounts for his compensation, ultimately ranging between \$12,000 and \$18,000 per month, and that he also sought a percentage of the funds raised. The Campaign did not accept these proposals.
4. At the time of these compensation discussions, the Campaign had a large cash-on-hand balance, and I was not concerned about being able to pay Mr. Short or any of the members of the Campaign team. To the best of my memory, I do not recall discussing Mr. Short's compensation at any time directly with Representative Bachmann.
5. To the best of my knowledge, Mr. Short eventually agreed to his component of the compensation at \$15,000 per month.
6. Mr. Short later told me that he was going to receive or continue to receive compensation (an estimated \$5,000 retainer) per month from Representative Bachmann's leadership PAC ("the PAC") for work he would perform or continue to perform for the PAC. I believe that that Mr. Short described this as a full or partial continuation of work he had previously done for the PAC.
7. I seem to recall having told Mr. Short that any payment he received from the PAC was between him and the PAC, as long as counsel for the Campaign did not have

any concerns about Mr. Short working for both entities. Subsequently, I recall a conversation(s) with the Campaign's counsel where he stated that Mr. Short could work for both the PAC and the Campaign. To the best of my recollection, I did not have any other conversations about whether the PAC should or should not pay Mr. Short. I do not recall speaking with Representative Bachmann about Mr. Short's compensation from the PAC.

Subcontractor Relationship

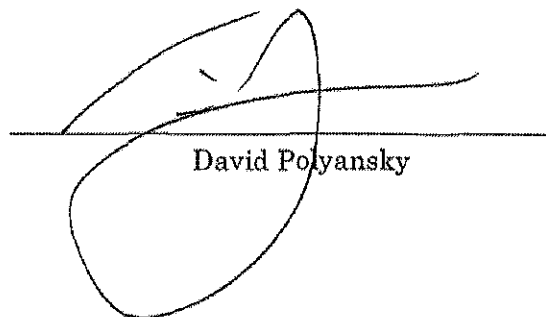
8. Before I was hired by the Campaign, it is my recollection that I believed the PAC was compensating Mr. Short's company for a subcontractor it had hired. This subcontractor was Mr. Kent Sorenson or his company.
9. It was my understanding that Mr. Short wanted Mr. Sorenson to perform these same services for the Campaign, and that Mr. Sorenson or his company would continue to serve as a subcontractor to Mr. Short.
10. I told Mr. Short that he needed to get approval from the Campaign's counsel for any subcontractor relationship, because the Campaign was not contracting with Mr. Sorenson directly and because he was an Iowa State Senator. As I recall, when I was told by Mr. Short that counsel had in fact approved the arrangement, I contacted the Campaign's counsel personally to confirm such approval and to be sure there were no issues with the subcontractor agreement before executing the contract. It was my normal practice to ask the Campaign's counsel to draft and subsequently review all campaign contracts, both for employees and for independent contractors. I do not recall specifically discussing the subcontractor arrangement at that time with anyone other than Mr. Short and counsel.
11. In my experience, it is common practice for campaign vendors to hire subcontractors. Sometimes, the amount paid to the vendor will include amounts the vendor pays to subcontractors and sometimes the amount paid to subcontractors will be added to the amount paid to the vendor.
12. To the best of my recollection, it was understood that Mr. Sorenson's payment would not be subtracted from the \$15,000 per month paid to Mr. Short. Mr. Short's company would instead receive the \$15,000 per month in addition to an amount for the subcontract. To the best of my knowledge and belief, the total amount the Campaign paid Mr. Short's company was at or about \$22,500 per month.

Relationship to the PAC

13. I had no authority over the PAC's funds, no ability to influence decisions by the PAC, and no control over the PAC's personnel or management decisions. I never asked that Mr. Short be paid by the PAC, and I never suggested that the PAC should pay Mr. Short. I had no authority to, and did not authorize the PAC to pay Mr. Short. My only responsibility was to the Campaign, and that is why I asked counsel for his advice on said relationship -- to ensure that the Campaign, not the PAC, was in compliance under such a relationship.

14. Through my brief tenure with the Campaign, whenever a question was raised about a payment by the PAC to a vendor, I specifically said that I did not have any control over the PAC and that those vendors should contact PAC staff/contractors. I never suggested to any Campaign vendors that they should ask the PAC for compensation for work done for the Campaign.

Dated: April 22, 2013



David Polyansky

EXHIBIT 10

C&M Strategies

1617 Parkdale Circle North
Erie, CO 80516
303-834-████

2/17/2011

Billing Cycle: February

Bill to:

MICHELE-PAC

Attn: Dan Puel
PO Box 251190
Woodbury, MN 55125

Date	Discription	Hours	Hourly Rate	Total
1.28	CPAC Organization	NA	NA	\$14,085.00
Total				\$14,085.00

Please Remit Payment to:

C&M Strategies
Attn: Guy Short
1617 Parkdale Circle North
Erie, CO 80516
303-834-████

MPAC00001

13-1274_0062

C&M Strategies

1617 Parkdale Circle North
Erie, CO 80516
303-834-████

2.2.11

Billing Cycle: February

Bill to:

MICHELE-PAC

Attn: Dan Puel
PO Box 251190
Woodbury, MN 55125

Date	Discription	Hours	Hourly Rate	Total
2.2.11	CPAC Organization	NA	NA	\$3,750.00
Total				\$3,750.00

Please Remit Payment to:

C&M Strategies
Attn: Guy Short
1617 Parkdale Circle North
Erie, CO 80516
303-834-████

MPAC00002

13-1274_0063

C&M Strategies

1617 Parkdale Circle North
Erie, CO 80516
303-834-████

1/28/2011

Billing Cycle: 1/1/11-1/31/11

Bill to:

MICHELE-PAC

Attn: Dan Puel
PO Box 251190
Woodbury, MN 55125

Date	Discription	Hours	Hourly Rate	Total
1.28	CPAC Organization	NA	NA	\$5,285.00
Total				\$5,285.00

Please Remit Payment to:

C&M Strategies
Attn: Guy Short
1617 Parkdale Circle North
Erie, CO 80516
303-834-████

MPAC00003

13-1274_0064

C&M Strategies

1617 Parkdale Circle North
Erie, CO 80516
303-834-████

1.20.11

Billing Cycle: February

Bill to:

MICHELE-PAC

Attn: Dan Puel
PO Box 251190
Woodbury, MN 55125

Date	Discription	Hours	Hourly Rate	Total
1.20.11	CPAC Organization	NA	NA	\$2,975.00
Total				\$2,975.00

Please Remit Payment to:

C&M Strategies
Attn: Guy Short
1617 Parkdale Circle North
Erie, CO 80516
303-834-████

MPAC00004

13-1274_0065

Coast 2 Coast

2310 S. Industrial Hwy
Ann Arbor, MI 48104

Toll Free: 877-845-
Fax: 734-585-3472
Email: @Coast2CoastBus.com

Charter Contract

Contract Number: 1000		Confirmation Date: 2/3/2011		Quantity Ordered: 1 - 55 PASSENGER				
Billing Address: CM STRATEGIES 1617 PARKDALE CIRCLE NORTH ERIE CO 80516				Ordered By: ASHLEY GROSSMAN				
				Phone: (612) 267-				
				Fax:				
				Date of Departure: 2/9/2011				
				Report Time: 8 :00 AM				
Departure Point: MAPLE GROVE, MN - CHURCH OF THE OPEN DOOR -9060 ZANZIBAR LANE N. STOP IN TOLEDO, OHIO FOR PICK UP TO BE ADVISED			Destination: WASHINGTON, DC					
Return Leave Time: 7 :00 PM		Return Date: 2/12/2011		Return Arrival Time: 7 :00 PM		Return Arrival Date: 2/13/2011		
Detailed Information Regarding Charter Needs: COMP ROOM FOR DRIVER								
<p style="text-align: center;">Total Charge: \$7,800.00</p> <p><u>This Contract is to confirm our cost specifications. To insure accuracy, please review the above information and contact us immediately with any discrepancies or changes that need to be made. Make the changes on the copy you sign and return to us with your deposit/payment. Coast 2 Coast, LLC is not responsible for any items lost, stolen, or left on the bus at the end of the trip.</u></p> <p>The cost of our services is based in part on the time involved and/or the mileage traveled. Any deviation from the original charter order may incur additional charges. Should the actual charter involve more mileage, time and/or incidental charges then originally contracted for, a revision reflecting the additional cost will be made and resubmitted for payment.</p> <p>A Deposit of: <u>\$0.00</u> Is due in our office on or before:</p> <p>Payment in FULL is due in our office on or before: <u>FEBRUARY 7, 2011</u></p> <p>The deposit must be made by the date provided to assure that you coach(s) are reserved. If a charter is cancelled 14 days prior to your departure your deposit will be refunded.</p> <p style="text-align: center;">If cancellation is not made 14 days prior to departure date, deposit will be forfeited.</p> <p style="text-align: center;">Thank you for choosing Coast 2 Coast, LLC. We look forward to providing you with a comfortable and safe experience!</p> <table border="0" style="width: 100%;"><tr><td style="width: 50%; text-align: center;">_____ Signature Authorizing Charter Cost</td><td style="width: 50%; text-align: center;">_____ Date</td></tr></table>							_____ Signature Authorizing Charter Cost	_____ Date
_____ Signature Authorizing Charter Cost	_____ Date							

MPAC00005

13-1274_0066

C&M Strategies

1617 Parkdale Circle North
Erie, CO 80516
303-834-████

Billing Date: 2/17/11

Billing Cycle: January

Bill to:

MICHELE-PAC

Attn: Dan Puhl
PO Box 251190
Woodbury, MN 55125

Date	Discription	Hours	Hourly Rate	Total
January	Fundraising Consulting	NA	NA	\$4,500
Total				\$4,500.00

Please Remit Payment to:

C&M Strategies
Attn: Guy Short
1617 Parkdale Circle North
Erie, CO 80516
303-834-████

MPAC00006

13-1274_0067

C&M Strategies

1617 Parkdale Circle North
Erie, CO 80516
303-834-████

Billing Date: 4/6/11

Billing Cycle: March Expenses

Bill to:

MICHELE-PAC

Attn: Dan Puel
PO Box 251190
Woodbury, MN 55125

Date	Discription	Hours	Hourly Rate	Total
March	Iowa Trip Expenses	NA	NA	\$1,627
Total				\$1,627.40

Please Remit Payment to:

C&M Strategies
Attn: Guy Short
1617 Parkdale Circle North
Erie, CO 80516
303-834-████

MPAC00007

13-1274_0068

Airfare

	Date	Expense	Total
Delta	3/22/2011	365.35	
United	3/25/2011	369.70	
Baggage	3/25/2011	80.00	
			815.05

Mileage

Home to DIA (32 miles each way)	3/21/2011	35.20	
			35.2

Parking/Taxi

DIA Parking	3/24/2011	72.00	
			72.00

Hotel

Hampton	3/24/2011	99.68	
Sheraton	3/24/2011	339.98	
			439.66

Meals

airport snack	3/25/2011	12.05	
Lunch (Guy/ryan,faith)	3/24/2011	40.00	
Dinner (Guy/Andy/Faith)	3/22/2011	60.87	
snack sheraton	3/23/2011	8.48	
Lunch (MB, Faith,Guy)	3/23/2011	44.98	
snack sheraton	3/24/2001	6.06	
Lunch	3/24/2011	13.64	
Dinner (Guy/Aaron Dorr, Kent, Ryan, Andy)	3/24/2011	79.41	

			265.49
Total		1627.40	1627.40

C&M Strategies

1617 Parkdale Circle North
Erie, CO 80516
303-834-████

Billing Date: 4/1/11

Billing Cycle: Feb-March

Bill to:

MICHELE-PAC
Attn: Dan Puel
PO Box 251190
Woodbury, MN 55125

Date	Discription	Hours	Hourly Rate	Total
Feb-March	Fundraising Consulting	NA	NA	\$9,000
Total				\$9,000.00

Please Remit Payment to:

C&M Strategies
Attn: Guy Short
1617 Parkdale Circle North
Erie, CO 80516
303-834-████

MPAC00009

13-1274_0070

C&M Strategies

1617 Parkdale Circle North
Erie, CO 80516
303-834-████

Billing Date: 5/6/11

Billing Cycle: April

Bill to:

MICHELE-PAC
Attn: Dan Puel
PO Box 251190
Woodbury, MN 55125

Date	Discription	Hours	Hourly Rate	Total
April	Fundraising Consulting	NA	NA	\$4,500
April	Management Consulting	NA	NA	\$4,675
Total				\$9,175.00

Please Remit Payment to:

C&M Strategies
Attn: Guy Short
1617 Parkdale Circle North
Erie, CO 80516
303-834-████

MPAC00010

13-1274_0071

C&M Strategies

1617 Parkdale Circle North
Erie, CO 80516
303-834-████

Billing Date: 6/20/1

Billing Cycle: June

Bill to:

MICHELE-PAC

Attn: Dan Puel
PO Box 251190
Woodbury, MN 55125

Date	Discription	Hours	Hourly Rate	Total
April	Fundraising Consulting	NA	NA	\$2,250
April	Management Consulting	NA	NA	\$3,500
Total				\$5,750.00

Please Remit Payment to:

C&M Strategies
Attn: Guy Short
1617 Parkdale Circle North
Erie, CO 80516
303-834-████

MPAC00011

13-1274_0072

C&M Strategies

1617 Parkdale Circle North
Erie, CO 80516
303-834-████

Billing Date: 12/5/11

Billing Cycle: NA

Bill to:

MICHELE-PAC

Attn: Dan Puel
PO Box 251190
Woodbury, MN 55125

Date	Discription	Hours	Hourly Rate	Total
Dec	Fundraising Project	NA	NA	\$20,000
Total				\$20,000.00

Please Remit Payment to:

C&M Strategies
Attn: Guy Short
1617 Parkdale Circle North
Erie, CO 80516
303-834-████

MPAC00012

13-1274_0073

C&M Strategies

1617 Parkdale Circle North
Erie, CO 80516
303-834-████

Billing Date: 12/31/11

Billing Cycle: DEC

Bill to:

MICHELE-PAC

Attn: Dan Puel
PO Box 251190
Woodbury, MN 55125

Date	Discription	Hours	Hourly Rate	Total
DEC	Management Consulting	NA	NA	\$5,000
Total				\$5,000.00

Please Remit Payment to:

C&M Strategies
Attn: Guy Short
1617 Parkdale Circle North
Erie, CO 80516
303-834-████

MPAC00013

13-1274_0074

C&M Strategies

1617 Parkdale Circle North
Erie, CO 80516
303-834- [REDACTED]

Billing Date: 12/31/11

Billing Cycle: DEC

Bill to:

MICHELE-PAC

Attn: Dan Puel
PO Box 251190
Woodbury, MN 55125

Date	Discription	Hours	Hourly Rate	Total
DEC	Fundraising and Research project	NA	NA	\$15,000
Total				\$15,000.00

Please Remit Payment to:

C&M Strategies
Attn: Guy Short
1617 Parkdale Circle North
Erie, CO 80516
303-834- [REDACTED]

MPAC00014

13-1274_0075

C&M Strategies

1617 Parkdale Circle North
Erie, CO 80516
303-834-████

Billing Date: 7/5/11

Billing Cycle: June 15-30

Bill to:

MICHELE-PAC
Attn: Dan Puel
PO Box 251190
Woodbury, MN 55125

Date	Discription	Hours	Hourly Rate	Total
April	Management Consulting	NA	NA	\$2,500
Total				\$2,500.00

Please Remit Payment to:

C&M Strategies
Attn: Guy Short
1617 Parkdale Circle North
Erie, CO 80516
303-834-████

MPAC00015

13-1274_0076

C&M Strategies

1617 Parkdale Circle North
Erie, CO 80516
303-834-████

Billing Date: 8/2/11

Billing Cycle: July

Bill to:

MICHELE-PAC

Attn: Dan Puel
PO Box 251190
Woodbury, MN 55125

Date	Discription	Hours	Hourly Rate	Total
April	Management Consulting	NA	NA	\$5,000
Total				\$5,000.00

Please Remit Payment to:

C&M Strategies
Attn: Guy Short
1617 Parkdale Circle North
Erie, CO 80516
303-834-████

MPAC00016

13-1274_0077

C&M Strategies

1617 Parkdale Circle North
Erie, CO 80516
303-834-████

Billing Date: 8/31/11

Billing Cycle: August

Bill to:

MICHELE-PAC
Attn: Dan Puel
PO Box 251190
Woodbury, MN 55125

Date	Discription	Hours	Hourly Rate	Total
August	Management Consulting	NA	NA	\$5,000
Total				\$5,000.00

Please Remit Payment to:

C&M Strategies
Attn: Guy Short
1617 Parkdale Circle North
Erie, CO 80516
303-834-████

MPAC00017

13-1274_0078

C&M Strategies

1617 Parkdale Circle North
Erie, CO 80516
303-834-████

Billing Date: 10/3/11

Billing Cycle: Sept

Bill to:

MICHELE-PAC
Attn: Dan Puel
PO Box 251190
Woodbury, MN 55125

Date	Discription	Hours	Hourly Rate	Total
Sept	Management Consulting	NA	NA	\$5,000
Total				\$5,000.00

Please Remit Payment to:

C&M Strategies
Attn: Guy Short
1617 Parkdale Circle North
Erie, CO 80516
303-834-████

MPAC00018

13-1274_0079

C&M Strategies

1617 Parkdale Circle North
Erie, CO 80516
303-834-████

Billing Date: 7/9/12

Billing Cycle: 2012

Bill to:

MICHELE-PAC

Attn: Dan Puel

Date	Discription	Hours	Hourly Rate	Total
2012	General Consulting	NA	NA	\$3,750
Total				\$3,750.00

Please Remit Payment to:

C&M Strategies

Attn: Guy Short

1617 Parkdale Circle North

Erie, CO 80516

303-834-████

MPAC00019

13-1274_0080

C&M Strategies

1617 Parkdale Circle North
Erie, CO 80516
303-834-████

Billing Date: 11/1/11

Billing Cycle: October

Bill to:

MICHELE-PAC
Attn: Dan Puel
PO Box 251190
Woodbury, MN 55125

Date	Discription	Hours	Hourly Rate	Total
Oct	Management Consulting	NA	NA	\$5,000
Total				\$5,000.00

Please Remit Payment to:

C&M Strategies
Attn: Guy Short
1617 Parkdale Circle North
Erie, CO 80516
303-834-████

MPAC00021

13-1274_0081

C&M Strategies

1617 Parkdale Circle North
Erie, CO 80516
303-834-████

Billing Date: 11/30/11

Billing Cycle: Nov

Bill to:

MICHELE-PAC

Attn: Dan Puel
PO Box 251190
Woodbury, MN 55125

Date	Discription	Hours	Hourly Rate	Total
Nov	Management Consulting	NA	NA	\$5,000
Total				\$5,000.00

Please Remit Payment to:

C&M Strategies
Attn: Guy Short
1617 Parkdale Circle North
Erie, CO 80516
303-834-████

MPAC00022

13-1274_0082

EXHIBIT 11

DETAILED SUMMARY PAGE of Receipts

FEC Form 3X (Rev. 08/2004)

Page 3

Write or Type Committee Name

Many Individual Conservatives Helping Elect Leaders Everywhere (MICHELEPAC)

Report Covering the Period:

From:

01 / 01 / 2011

To:

01 / 31 / 2011

I. Receipts	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
11. Contributions (other than loans) From:		
(a) Individuals/Persons Other Than Political Committees		
(i) Itemized (use Schedule A).....	33085	33085
(ii) Unitemized.....	124236.16	124236.16
(iii) TOTAL (add Lines 11(a)(i) and (ii).....▶	157321.16	157321.16
(b) Political Party Committees.....	0	0
(c) Other Political Committees (such as PACs).....	0	0
(d) Total Contributions (add Lines 11(a)(iii), (b), and (c)) (Carry Totals to Line 33, page 5).....▶	157321.16	157321.16
12. Transfers From Affiliated/Other Party Committees.....	0	0
13. All Loans Received.....	0	0
14. Loan Repayments Received.....	0	0
15. Offsets To Operating Expenditures (Refunds, Rebates, etc.) (Carry Totals to Line 37, page 5).....	0	0
16. Refunds of Contributions Made to Federal Candidates and Other Political Committees.....	0	0
17. Other Federal Receipts (Dividends, Interest, etc.).....	0	0
18. Transfers from Non-Federal and Levin Funds		
(a) Non-Federal Account (from Schedule H3).....	0	0
(b) Levin Funds (from Schedule H5).....	0	0
(c) Total Transfers (add 18(a) and 18(b))..	0	0
19. Total Receipts (add Lines 11(d), 12, 13, 14, 15, 16, 17, and 18(c)).....▶	157321.16	157321.16
20. Total Federal Receipts (subtract Line 18(c) from Line 19).....▶	157321.16	157321.16

DETAILED SUMMARY PAGE of Receipts

FEC Form 3X (Rev. 06/2004)

Page 3

Write or Type Committee Name

Many Individual Conservatives Helping Elect Leaders Everywhere (MICHELEPAC)

Report Covering the Period:

From:

MM / DD / YYYY
02 / 01 / 2011

To:

MM / DD / YYYY
02 / 28 / 2011

I. Receipts	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
11. Contributions (other than loans) From:		
(a) Individuals/Persons Other Than Political Committees		
(i) Itemized (use Schedule A).....	11750	44835
(ii) Unitemized.....	80283.98	204520.14
(iii) TOTAL (add Lines 11(a)(i) and (ii)).....▶	92033.98	249355.14
(b) Political Party Committees.....	0	0
(c) Other Political Committees (such as PACs).....	0	0
(d) Total Contributions (add Lines 11(a)(iii), (b), and (c)) (Carry Totals to Line 33, page 5).....▶	92033.98	249355.14
12. Transfers From Affiliated/Other Party Committees.....	0	0
13. All Loans Received.....	0	0
14. Loan Repayments Received.....	0	0
15. Offsets To Operating Expenditures (Refunds, Rebates, etc.) (Carry Totals to Line 37, page 5).....	0	0
16. Refunds of Contributions Made to Federal Candidates and Other Political Committees.....	0	0
17. Other Federal Receipts (Dividends, Interest, etc.).....	0	0
18. Transfers from Non-Federal and Levin Funds		
(a) Non-Federal Account (from Schedule H3).....	0	0
(b) Levin Funds (from Schedule H5).....	0	0
(c) Total Transfers (add 18(a) and 18(b))..	0	0
19. Total Receipts (add Lines 11(d), 12, 13, 14, 15, 16, 17, and 18(c)).....▶	92033.98	249355.14
20. Total Federal Receipts (subtract Line 18(c) from Line 19).....▶	92033.98	249355.14

DETAILED SUMMARY PAGE of Receipts

FEC Form 3X (Rev. 06/2004)

Page 3

Write or Type Committee Name

Many Individual Conservatives Helping Elect Leaders Everywhere (MICHELEPAC)

Report Covering the Period:

From:

M M / D D / Y Y Y Y
03 / 01 / 2011

To:

M M / D D / Y Y Y Y
03 / 31 / 2011

I. Receipts	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
11. Contributions (other than loans) From:		
(a) Individuals/Persons Other Than Political Committees		
(i) Itemized (use Schedule A).....	94245	139080
(ii) Unitemized	194334.82	398854.96
(iii) TOTAL (add Lines 11(a)(i) and (ii))..... ▶	288579.82	537934.96
(b) Political Party Committees	0	0
(c) Other Political Committees (such as PACs).....	0	0
(d) Total Contributions (add Lines 11(a)(iii), (b), and (c)) (Carry Totals to Line 33, page 5)..... ▶	288579.82	537934.96
12. Transfers From Affiliated/Other Party Committees.....	0	0
13. All Loans Received.....	0	0
14. Loan Repayments Received.....	0	0
15. Offsets To Operating Expenditures (Refunds, Rebates, etc.) (Carry Totals to Line 37, page 5).....	269.21	269.21
16. Refunds of Contributions Made to Federal Candidates and Other Political Committees.....	0	0
17. Other Federal Receipts (Dividends, Interest, etc.).....	0	0
18. Transfers from Non-Federal and Levin Funds		
(a) Non-Federal Account (from Schedule H3)	0	0
(b) Levin Funds (from Schedule H5)	0	0
(c) Total Transfers (add 18(a) and 18(b))..	0	0
19. Total Receipts (add Lines 11(d), 12, 13, 14, 15, 16, 17, and 18(c))..... ▶	288849.03	538204.17
20. Total Federal Receipts (subtract Line 18(c) from Line 19)..... ▶	288849.03	538204.17

DETAILED SUMMARY PAGE of Receipts

FEC Form 3X (Rev. 06/2004)

Page 3

Write or Type Committee Name

Many Individual Conservatives Helping Elect Leaders Everywhere (MICHELEPAC)

Report Covering the Period:

From:

04 / 01 / 2011

To:

04 / 30 / 2011

I. Receipts	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
11. Contributions (other than loans) From:		
(a) Individuals/Persons Other Than Political Committees		
(i) Itemized (use Schedule A).....	53930	193010
(ii) Unitemized.....	119903.98	518758.94
(iii) TOTAL (add Lines 11(a)(i) and (ii)).....▶	173833.98	711768.94
(b) Political Party Committees.....	0	0
(c) Other Political Committees (such as PACs).....	0	0
(d) Total Contributions (add Lines 11(a)(iii), (b), and (c)) (Carry Totals to Line 33, page 5).....▶	173833.98	711768.94
12. Transfers From Affiliated/Other Party Committees.....	0	0
13. All Loans Received.....	0	0
14. Loan Repayments Received.....	0	0
15. Offsets To Operating Expenditures (Refunds, Rebates, etc.) (Carry Totals to Line 37, page 5).....	308.49	577.7
16. Refunds of Contributions Made to Federal Candidates and Other Political Committees.....	0	0
17. Other Federal Receipts (Dividends, Interest, etc.).....	0	0
18. Transfers from Non-Federal and Levin Funds		
(a) Non-Federal Account (from Schedule H3).....	0	0
(b) Levin Funds (from Schedule H5).....	0	0
(c) Total Transfers (add 18(a) and 18(b))..	0	0
19. Total Receipts (add Lines 11(d), 12, 13, 14, 15, 16, 17, and 18(c)).....▶	174142.47	712346.64
20. Total Federal Receipts (subtract Line 18(c) from Line 19).....▶	174142.47	712346.64

DETAILED SUMMARY PAGE of Receipts

FEC Form 3X (Rev. 06/2004)

Page 3

Write or Type Committee Name

Many Individual Conservatives Helping Elect Leaders Everywhere (MICHELEPAC)

Report Covering the Period:

From:

05	01	2011
----	----	------

To:

05	31	2011
----	----	------

I. Receipts	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
11. Contributions (other than loans) From:		
(a) Individuals/Persons Other Than Political Committees	92585.94	285595.94
(i) Itemized (use Schedule A).....		
(ii) Unitemized.....	119847.44	638606.38
(iii) TOTAL (add Lines 11(a)(i) and (ii))..... ▶	212433.38	924202.32
(b) Political Party Committees.....	0	0
(c) Other Political Committees (such as PACs).....	0	0
(d) Total Contributions (add Lines 11(a)(iii), (b), and (c)) (Carry Totals to Line 33, page 5)..... ▶	212433.38	924202.32
12. Transfers From Affiliated/Other Party Committees.....	0	0
13. All Loans Received.....	0	0
14. Loan Repayments Received.....	0	0
15. Offsets To Operating Expenditures (Refunds, Rebates, etc.) (Carry Totals to Line 37, page 5).....	348.88	926.58
16. Refunds of Contributions Made to Federal Candidates and Other Political Committees.....	0	0
17. Other Federal Receipts (Dividends, Interest, etc.).....	0	0
18. Transfers from Non-Federal and Levin Funds		
(a) Non-Federal Account (from Schedule H3).....	0	0
(b) Levin Funds (from Schedule H5).....	0	0
(c) Total Transfers (add 18(a) and 18(b))..	0	0
19. Total Receipts (add Lines 11(d), 12, 13, 14, 15, 16, 17, and 18(c))..... ▶	212782.26	925128.9
20. Total Federal Receipts (subtract Line 18(c) from Line 19)..... ▶	212782.26	925128.9

DETAILED SUMMARY PAGE of Receipts

FEC Form 3X (Rev. 06/2004)

Page 3

Write or Type Committee Name

Many Individual Conservatives Helping Elect Leaders Everywhere (MICHELEPAC)

Report Covering the Period:

From:

 M M / D D / Y Y Y Y
 06 / 01 / 2011

To:

 M M / D D / Y Y Y Y
 06 / 30 / 2011

I. Receipts	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
11. Contributions (other than loans) From:		
(a) Individuals/Persons Other Than Political Committees		
(i) Itemized (use Schedule A).....	22160	307755.94
(ii) Unitemized	38406	677012.38
(iii) TOTAL (add Lines 11(a)(i) and (ii)).....▶	60566	984768.32
(b) Political Party Committees	0	0
(c) Other Political Committees (such as PACs).....	5000	5000
(d) Total Contributions (add Lines 11(a)(iii), (b), and (c)) (Carry Totals to Line 33, page 5).....▶	65566	989768.32
12. Transfers From Affiliated/Other Party Committees.....	0	0
13. All Loans Received.....	0	0
14. Loan Repayments Received.....	0	0
15. Offsets To Operating Expenditures (Refunds, Rebates, etc.) (Carry Totals to Line 37, page 5).....	386.9	1313.48
16. Refunds of Contributions Made to Federal Candidates and Other Political Committees.....	0	0
17. Other Federal Receipts (Dividends, Interest, etc.).....	0	0
18. Transfers from Non-Federal and Levin Funds		
(a) Non-Federal Account (from Schedule H3).....	0	0
(b) Levin Funds (from Schedule H5)	0	0
(c) Total Transfers (add 18(a) and 18(b))..	0	0
19. Total Receipts (add Lines 11(d), 12, 13, 14, 15, 16, 17, and 18(c)).....▶	65952.9	991081.8
20. Total Federal Receipts (subtract Line 18(c) from Line 19).....▶	65952.9	991081.8

DETAILED SUMMARY PAGE of Receipts

FEC Form 3X (Rev. 06/2004)

Page 3

Write or Type Committee Name

Many Individual Conservatives Helping Elect Leaders Everywhere (MICHELEPAC)

Report Covering the Period:

From:

MM / DD / YYYY
07 / 01 / 2011

To:

MM / DD / YYYY
07 / 31 / 2011

I. Receipts	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
11. Contributions (other than loans) From:		
(a) Individuals/Persons Other Than Political Committees		
(i) Itemized (use Schedule A).....	910	308665.94
(ii) Unitemized.....	7870.5	684882.88
(iii) TOTAL (add Lines 11(a)(i) and (ii)).....▶	8780.5	993548.82
(b) Political Party Committees	0	0
(c) Other Political Committees (such as PACs).....	5000	10000
(d) Total Contributions (add Lines 11(a)(iii), (b), and (c)) (Carry Totals to Line 33, page 5).....▶	13780.5	1003548.82
12. Transfers From Affiliated/Other Party Committees.....	0	0
13. All Loans Received.....	0	0
14. Loan Repayments Received.....	0	0
15. Offsets To Operating Expenditures (Refunds, Rebates, etc.) (Carry Totals to Line 37, page 5).....	0	1313.48
16. Refunds of Contributions Made to Federal Candidates and Other Political Committees.....	0	0
17. Other Federal Receipts (Dividends, Interest, etc.).....	0	0
18. Transfers from Non-Federal and Levin Funds		
(a) Non-Federal Account (from Schedule H3).....	0	0
(b) Levin Funds (from Schedule H5).....	0	0
(c) Total Transfers (add 18(a) and 18(b))..	0	0
19. Total Receipts (add Lines 11(d), 12, 13, 14, 15, 16, 17, and 18(c)).....▶	13780.5	1004862.3
20. Total Federal Receipts (subtract Line 18(c) from Line 19).....▶	13780.5	1004862.3

DETAILED SUMMARY PAGE of Receipts

FEC Form 3X (Rev. 06/2004)

Page 3

Write or Type Committee Name

Many Individual Conservatives Helping Elect Leaders Everywhere (MICHELEPAC)

Report Covering the Period:

From:

MM / DD / YYYY
08 / 01 / 2011

To:

MM / DD / YYYY
08 / 31 / 2011

I. Receipts	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
11. Contributions (other than loans) From:		
(a) Individuals/Persons Other Than Political Committees		
(i) Itemized (use Schedule A).....	1400	310065.94
(ii) Unitemized.....	2594.5	687477.38
(iii) TOTAL (add Lines 11(a)(i) and (ii)).....▶	3994.5	997543.32
(b) Political Party Committees.....	0	0
(c) Other Political Committees (such as PACs).....	0	10000
(d) Total Contributions (add Lines 11(a)(iii), (b), and (c)) (Carry Totals to Line 33, page 5).....▶	3994.5	1007543.32
12. Transfers From Affiliated/Other Party Committees.....	0	0
13. All Loans Received.....	0	0
14. Loan Repayments Received.....	0	0
15. Offsets To Operating Expenditures (Refunds, Rebates, etc.) (Carry Totals to Line 37, page 5).....	237.6	1551.08
16. Refunds of Contributions Made to Federal Candidates and Other Political Committees.....	0	0
17. Other Federal Receipts (Dividends, Interest, etc.).....	0	0
18. Transfers from Non-Federal and Levin Funds		
(a) Non-Federal Account (from Schedule H3).....	0	0
(b) Levin Funds (from Schedule H5).....	0	0
(c) Total Transfers (add 18(a) and 18(b))..	0	0
19. Total Receipts (add Lines 11(d), 12, 13, 14, 15, 16, 17, and 18(c)).....▶	4232.1	1009094.4
20. Total Federal Receipts (subtract Line 18(c) from Line 19).....▶	4232.1	1009094.4

DETAILED SUMMARY PAGE of Receipts

FEC Form 3X (Rev. 06/2004)

Page 3

Write or Type Committee Name

Many Individual Conservatives Helping Elect Leaders Everywhere (MICHELEPAC)

Report Covering the Period:

From:

M * M	/	D * D	/	Y * Y * Y * Y
09	/	01	/	2011

To:

M * M	/	D * D	/	Y * Y * Y * Y
09	/	30	/	2011

I. Receipts	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
11. Contributions (other than loans) From:		
(a) Individuals/Persons Other Than Political Committees		
(i) Itemized (use Schedule A).....	931	310996.94
(ii) Unitemized.....	847.5	688324.88
(iii) TOTAL (add Lines 11(a)(i) and (ii)).....▶	1778.5	999321.82
(b) Political Party Committees.....	0	0
(c) Other Political Committees (such as PACs).....	0	10000
(d) Total Contributions (add Lines 11(a)(iii), (b), and (c)) (Carry Totals to Line 33, page 5).....▶	1778.5	1009321.82
12. Transfers From Affiliated/Other Party Committees.....	0	0
13. All Loans Received.....	0	0
14. Loan Repayments Received.....	0	0
15. Offsets To Operating Expenditures (Refunds, Rebates, etc.) (Carry Totals to Line 37, page 5).....	93.46	1644.54
16. Refunds of Contributions Made to Federal Candidates and Other Political Committees.....	0	0
17. Other Federal Receipts (Dividends, Interest, etc.).....	0	0
18. Transfers from Non-Federal and Levin Funds		
(a) Non-Federal Account (from Schedule H3).....	0	0
(b) Levin Funds (from Schedule H5).....	0	0
(c) Total Transfers (add 18(a) and 18(b))..	0	0
19. Total Receipts (add Lines 11(d), 12, 13, 14, 15, 16, 17, and 18(c)).....▶	1871.96	1010966.36
20. Total Federal Receipts (subtract Line 18(c) from Line 19).....▶	1871.96	1010966.36

DETAILED SUMMARY PAGE of Receipts

FEC Form 3X (Rev. 06/2004)

Page 3

Write or Type Committee Name

Many Individual Conservatives Helping Elect Leaders Everywhere (MICHELEPAC)

Report Covering the Period:

From:

 M M / D D / Y Y Y Y Y Y
 10 / 01 / 2011

To:

 M M / D D / Y Y Y Y Y Y
 10 / 31 / 2011

I. Receipts	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
11. Contributions (other than loans) From:		
(a) Individuals/Persons Other Than Political Committees		
(i) Itemized (use Schedule A).....	150	311146.94
(ii) Unitemized	1100.9	689425.78
(iii) TOTAL (add Lines 11(a)(i) and (ii))..... ➤	1250.9	1000572.72
(b) Political Party Committees	0	0
(c) Other Political Committees (such as PACs).....	0	10000
(d) Total Contributions (add Lines 11(a)(iii), (b), and (c)) (Carry Totals to Line 33, page 5)..... ➤	1250.9	1010572.72
12. Transfers From Affiliated/Other Party Committees.....	0	0
13. All Loans Received.....	0	0
14. Loan Repayments Received.....	0	0
15. Offsets To Operating Expenditures (Refunds, Rebates, etc.) (Carry Totals to Line 37, page 5).....	107.72	1752.26
16. Refunds of Contributions Made to Federal Candidates and Other Political Committees.....	0	0
17. Other Federal Receipts (Dividends, Interest, etc.).....	0	0
18. Transfers from Non-Federal and Levin Funds		
(a) Non-Federal Account (from Schedule H3).....	0	0
(b) Levin Funds (from Schedule H5)	0	0
(c) Total Transfers (add 18(a) and 18(b))..	0	0
19. Total Receipts (add Lines 11(d), 12, 13, 14, 15, 16, 17, and 18(c))..... ➤	1358.62	1012324.98
20. Total Federal Receipts (subtract Line 18(c) from Line 19)..... ➤	1358.62	1012324.98

DETAILED SUMMARY PAGE of Receipts

FEC Form 3X (Rev. 06/2004)

Page 3

Write or Type Committee Name

Many Individual Conservatives Helping Elect Leaders Everywhere (MICHELEPAC)

Report Covering the Period:

From:

MM	DD	YYYY
11	01	2011

To:

MM	DD	YYYY
11	30	2011

I. Receipts
COLUMN A
Total This Period

COLUMN B
Calendar Year-to-Date

11. Contributions (other than loans) From:

(a) Individuals/Persons Other

Than Political Committees

(i) Itemized (use Schedule A).....

420

311566.94

(ii) Unitemized.....

622.5

690048.28

(iii) TOTAL (add

Lines 11(a)(i) and (ii)..... ▶

1042.5

1001615.22

(b) Political Party Committees

0

0

(c) Other Political Committees

(such as PACs).....

0

10000

(d) Total Contributions (add Lines

11(a)(iii), (b), and (c)) (Carry

Totals to Line 33, page 5)..... ▶

1042.5

1011615.22

12. Transfers From Affiliated/Other
Party Committees.....

0

0

13. All Loans Received.....

0

0

14. Loan Repayments Received.....

0

0

15. Offsets To Operating Expenditures

(Refunds, Rebates, etc.)

(Carry Totals to Line 37, page 5).....

0

1752.26

16. Refunds of Contributions Made

to Federal Candidates and Other

Political Committees.....

0

0

17. Other Federal Receipts

(Dividends, Interest, etc.).....

0

0

18. Transfers from Non-Federal and Levin Funds

(a) Non-Federal Account

(from Schedule H3).....

0

0

(b) Levin Funds (from Schedule H5).....

0

0

(c) Total Transfers (add 18(a) and 18(b))..

0

0

19. Total Receipts (add Lines 11(d),
12, 13, 14, 15, 16, 17, and 18(c))..... ▶

1042.5

1013367.48

20. Total Federal Receipts

(subtract Line 18(c) from Line 19)..... ▶

1042.5

1013367.48

DETAILED SUMMARY PAGE of Receipts

FEC Form 3X (Rev. 06/2004)

Page 3

Write or Type Committee Name

Many Individual Conservatives Helping Elect Leaders Everywhere (MICHELEPAC)

Report Covering the Period:

From:

MM / DD / YYYY
12 / 01 / 2011

To:

MM / DD / YYYY
12 / 31 / 2011

I. Receipts	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
11. Contributions (other than loans) From:		
(a) Individuals/Persons Other Than Political Committees		
(i) Itemized (use Schedule A).....	520	312086.94
(ii) Unitemized.....	590.5	690638.78
(iii) TOTAL (add Lines 11(a)(i) and (ii)).....▶	1110.5	1002725.72
(b) Political Party Committees.....	0	0
(c) Other Political Committees (such as PACs).....	0	10000
(d) Total Contributions (add Lines 11(a)(iii), (b), and (c)) (Carry Totals to Line 33, page 5).....▶	1110.5	1012725.72
12. Transfers From Affiliated/Other Party Committees.....	0	0
13. All Loans Received.....	0	0
14. Loan Repayments Received.....	0	0
15. Offsets To Operating Expenditures (Refunds, Rebates, etc.) (Carry Totals to Line 37, page 5).....	0	1752.26
16. Refunds of Contributions Made to Federal Candidates and Other Political Committees.....	0	0
17. Other Federal Receipts (Dividends, Interest, etc.).....	0	0
18. Transfers from Non-Federal and Levin Funds		
(a) Non-Federal Account (from Schedule H3).....	0	0
(b) Levin Funds (from Schedule H5).....	0	0
(c) Total Transfers (add 18(a) and 18(b))..	0	0
19. Total Receipts (add Lines 11(d), 12, 13, 14, 15, 16, 17, and 18(c)).....▶	1110.5	1014477.98
20. Total Federal Receipts (subtract Line 18(c) from Line 19).....▶	1110.5	1014477.98

DETAILED SUMMARY PAGE of Receipts

FEC Form 3X (Rev. 06/2004)

Page 3

Write or Type Committee Name

Many Individual Conservatives Helping Elect Leaders Everywhere (MICHELEPAC)

Report Covering the Period:

From:

MM / DD / YYYY
01 / 01 / 2012

To:

MM / DD / YYYY
01 / 31 / 2012**I. Receipts****COLUMN A**
Total This Period**COLUMN B**
Calendar Year-to-Date

11. Contributions (other than loans) From:

(a) Individuals/Persons Other

Than Political Committees

(i) Itemized (use Schedule A).....

0

0

(ii) Unitemized.....

1165.5

1165.5

(iii) TOTAL (add

Lines 11(a)(i) and (ii).....▶

1165.5

1165.5

(b) Political Party Committees.....

0

0

(c) Other Political Committees

(such as PACs).....

0

0

(d) Total Contributions (add Lines

11(a)(iii), (b), and (c) (Carry

Totals to Line 33, page 5).....▶

1165.5

1165.5

12. Transfers From Affiliated/Other

Party Committees.....

0

0

13. All Loans Received.....

0

0

14. Loan Repayments Received.....

0

0

15. Offsets To Operating Expenditures

(Refunds, Rebates, etc.)

(Carry Totals to Line 37, page 5).....

16.24

16.24

16. Refunds of Contributions Made

to Federal Candidates and Other

Political Committees.....

0

0

17. Other Federal Receipts

(Dividends, Interest, etc.).....

0

0

18. Transfers from Non-Federal and Levin Funds

(a) Non-Federal Account

(from Schedule H3).....

0

0

(b) Levin Funds (from Schedule H5).....

0

0

(c) Total Transfers (add 18(a) and 18(b))..

0

0

19. Total Receipts (add Lines 11(d),

12, 13, 14, 15, 16, 17, and 18(c)).....▶

1181.74

1181.74

20. Total Federal Receipts

(subtract Line 18(c) from Line 19).....▶

1181.74

1181.74

DETAILED SUMMARY PAGE of Receipts

FEC Form 3X (Rev. 06/2004)

Page 3

Write or Type Committee Name

Many Individual Conservatives Helping Elect Leaders Everywhere (MICHELEPAC)

Report Covering the Period:

From:

 MM / DD / YYYY
 02 / 01 / 2012

To:

 MM / DD / YYYY
 02 / 29 / 2012

I. Receipts	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
11. Contributions (other than loans) From:		
(a) Individuals/Persons Other Than Political Committees		
(i) Itemized (use Schedule A).....	0	0
(ii) Unitemized.....	636.86	1802.36
(iii) TOTAL (add Lines 11(a)(i) and (ii)).....▶	636.86	1802.36
(b) Political Party Committees.....	0	0
(c) Other Political Committees (such as PACs).....	0	0
(d) Total Contributions (add Lines 11(a)(ii), (b), and (c)) (Carry Totals to Line 33, page 5).....▶	636.86	1802.36
12. Transfers From Affiliated/Other Party Committees.....	0	0
13. All Loans Received.....	0	0
14. Loan Repayments Received.....	0	0
15. Offsets To Operating Expenditures (Refunds, Rebates, etc.) (Carry Totals to Line 37, page 5).....	7575	7591.24
16. Refunds of Contributions Made to Federal Candidates and Other Political Committees.....	0	0
17. Other Federal Receipts (Dividends, Interest, etc.).....	0	0
18. Transfers from Non-Federal and Levin Funds		
(a) Non-Federal Account (from Schedule H3).....	0	0
(b) Levin Funds (from Schedule H5).....	0	0
(c) Total Transfers (add 18(a) and 18(b))..	0	0
19. Total Receipts (add Lines 11(d), 12, 13, 14, 15, 16, 17, and 18(c)).....▶	8211.86	9393.6
20. Total Federal Receipts (subtract Line 18(c) from Line 19).....▶	8211.86	9393.6

DETAILED SUMMARY PAGE of Receipts

FEC Form 3X (Rev. 06/2004)

Page 3

Write or Type Committee Name

Many Individual Conservatives Helping Elect Leaders Everywhere (MICHELEPAC)

Report Covering the Period:

From:

MM / DD / YYYY
03 / 01 / 2012

To:

MM / DD / YYYY
03 / 31 / 2012**I. Receipts****COLUMN A**
Total This Period**COLUMN B**
Calendar Year-to-Date

11. Contributions (other than loans) From:

(a) Individuals/Persons Other

Than Political Committees

(i) Itemized (use Schedule A).....

(ii) Unitemized.....

(iii) TOTAL (add

Lines 11(a)(i) and (ii).....▶

(b) Political Party Committees.....

(c) Other Political Committees

(such as PACs).....

(d) Total Contributions (add Lines

11(a)(iii), (b), and (c)) (Carry

Totals to Line 33, page 5).....▶

12. Transfers From Affiliated/Other

Party Committees.....

13. All Loans Received.....

14. Loan Repayments Received.....

15. Offsets To Operating Expenditures

(Refunds, Rebates, etc.)

(Carry Totals to Line 37, page 5).....

16. Refunds of Contributions Made

to Federal Candidates and Other

Political Committees.....

17. Other Federal Receipts

(Dividends, Interest, etc.).....

18. Transfers from Non-Federal and Levin Funds

(a) Non-Federal Account

(from Schedule H3).....

(b) Levin Funds (from Schedule H5).....

(c) Total Transfers (add 18(a) and 18(b))..

19. Total Receipts (add Lines 11(d),

12, 13, 14, 15, 16, 17, and 18(c)).....▶

20. Total Federal Receipts

(subtract Line 18(c) from Line 19).....▶

DETAILED SUMMARY PAGE of Receipts

FEC Form 3X (Rev. 06/2004)

Page 3

Write or Type Committee Name

Many Individual Conservatives Helping Elect Leaders Everywhere (MICHELEPAC)

Report Covering the Period:

From:

MM / DD / YYYY
04 / 01 / 2012

To:

MM / DD / YYYY
04 / 30 / 2012

I. Receipts	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
11. Contributions (other than loans) From:		
(a) Individuals/Persons Other Than Political Committees	0	0
(i) Itemized (use Schedule A).....		
(ii) Unitemized.....	1483.66	3846.52
(iii) TOTAL (add Lines 11(a)(i) and (ii))..... ▶	1483.66	3846.52
(b) Political Party Committees.....	0	0
(c) Other Political Committees (such as PACs).....	0	0
(d) Total Contributions (add Lines 11(a)(iii), (b), and (c)) (Carry Totals to Line 33, page 5)..... ▶	1483.66	3846.52
12. Transfers From Affiliated/Other Party Committees.....	0	0
13. All Loans Received.....	0	0
14. Loan Repayments Received.....	0	0
15. Offsets To Operating Expenditures (Refunds, Rebates, etc.) (Carry Totals to Line 37, page 5).....	0	7967.52
16. Refunds of Contributions Made to Federal Candidates and Other Political Committees.....	0	0
17. Other Federal Receipts (Dividends, Interest, etc.).....	0	0
18. Transfers from Non-Federal and Levin Funds		
(a) Non-Federal Account (from Schedule H3).....	0	0
(b) Levin Funds (from Schedule H5).....	0	0
(c) Total Transfers (add 18(a) and 18(b))..	0	0
19. Total Receipts (add Lines 11(d), 12, 13, 14, 15, 16, 17, and 18(c))..... ▶	1483.66	11814.04
20. Total Federal Receipts (subtract Line 18(c) from Line 19)..... ▶	1483.66	11814.04

DETAILED SUMMARY PAGE of Receipts

FEC Form 3X (Rev. 06/2004)

Page 3

Write or Type Committee Name

Many Individual Conservatives Helping Elect Leaders Everywhere (MICHELEPAC)

Report Covering the Period:

From:

MM / DD / YYYY
05 / 01 / 2012

To:

MM / DD / YYYY
05 / 31 / 2012

I. Receipts	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
11. Contributions (other than loans) From:		
(a) Individuals/Persons Other Than Political Committees		
(i) Itemized (use Schedule A).....	2090.24	2090.24
(ii) Unitemized	10845.12	14691.64
(iii) TOTAL (add Lines 11(a)(i) and (ii))..... ▶	12935.36	16781.88
(b) Political Party Committees	0	0
(c) Other Political Committees (such as PACs).....	0	0
(d) Total Contributions (add Lines 11(a)(iii), (b), and (c)) (Carry Totals to Line 33, page 5)..... ▶	12935.36	16781.88
12. Transfers From Affiliated/Other Party Committees.....	0	0
13. All Loans Received.....	0	0
14. Loan Repayments Received.....	0	0
15. Offsets To Operating Expenditures (Refunds, Rebates, etc.) (Carry Totals to Line 37, page 5).....	741	8708.52
16. Refunds of Contributions Made to Federal Candidates and Other Political Committees.....	0	0
17. Other Federal Receipts (Dividends, Interest, etc.).....	0	0
18. Transfers from Non-Federal and Levin Funds		
(a) Non-Federal Account (from Schedule H3).....	0	0
(b) Levin Funds (from Schedule H5).....	0	0
(c) Total Transfers (add 18(a) and 18(b))..	0	0
19. Total Receipts (add Lines 11(d), 12, 13, 14, 15, 16, 17, and 18(c))..... ▶	13676.36	25490.4
20. Total Federal Receipts (subtract Line 18(c) from Line 19)..... ▶	13676.36	25490.4

DETAILED SUMMARY PAGE of Receipts

FEC Form 3X (Rev. 06/2004)

Page 3

Write or Type Committee Name

Many Individual Conservatives Helping Elect Leaders Everywhere (MICHELEPAC)

Report Covering the Period:

From:

MM	DD	YYYY
06	01	2012

To:

MM	DD	YYYY
06	30	2012

I. Receipts	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
11. Contributions (other than loans) From:		
(a) Individuals/Persons Other Than Political Committees		
(i) Itemized (use Schedule A).....	2250	4340.24
(ii) Unitemized.....	3562.61	18254.25
(iii) TOTAL (add Lines 11(a)(i) and (ii)).....▶	5812.61	22594.49
(b) Political Party Committees.....	0	0
(c) Other Political Committees (such as PACs).....	0	0
(d) Total Contributions (add Lines 11(a)(iii), (b), and (c)) (Carry Totals to Line 33, page 5).....▶	5812.61	22594.49
12. Transfers From Affiliated/Other Party Committees.....	0	0
13. All Loans Received.....	0	0
14. Loan Repayments Received.....	0	0
15. Offsets To Operating Expenditures (Refunds, Rebates, etc.) (Carry Totals to Line 37, page 5).....	0	8708.52
16. Refunds of Contributions Made to Federal Candidates and Other Political Committees.....	0	0
17. Other Federal Receipts (Dividends, Interest, etc.).....	2300.21	2300.21
18. Transfers from Non-Federal and Levin Funds		
(a) Non-Federal Account (from Schedule H3).....	0	0
(b) Levin Funds (from Schedule H5).....	0	0
(c) Total Transfers (add 18(a) and 18(b))..	0	0
19. Total Receipts (add Lines 11(d), 12, 13, 14, 15, 16, 17, and 18(c)).....▶	8112.82	33603.22
20. Total Federal Receipts (subtract Line 18(c) from Line 19).....▶	8112.82	33603.22

DETAILED SUMMARY PAGE of Receipts

FEC Form 3X (Rev. 06/2004)

Page 3

Write or Type Committee Name

Many Individual Conservatives Helping Elect Leaders Everywhere (MICHELEPAC)

Report Covering the Period:

From:

07 / 01 / 2012

To:

07 / 31 / 2012

I. Receipts	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
11. Contributions (other than loans) From:		
(a) Individuals/Persons Other Than Political Committees		
(i) Itemized (use Schedule A).....	12750	17090.24
(ii) Unitemized	13346.08	31600.33
(iii) TOTAL (add Lines 11(a)(i) and (ii))..... ▶	26096.08	48690.57
(b) Political Party Committees	0	0
(c) Other Political Committees (such as PACs).....	0	0
(d) Total Contributions (add Lines 11(a)(iii), (b), and (c)) (Carry Totals to Line 33, page 5)..... ▶	26096.08	48690.57
12. Transfers From Affiliated/Other Party Committees.....	0	0
13. All Loans Received.....	0	0
14. Loan Repayments Received.....	0	0
15. Offsets To Operating Expenditures (Refunds, Rebates, etc.) (Carry Totals to Line 37, page 5).....	30383	39091.52
16. Refunds of Contributions Made to Federal Candidates and Other Political Committees.....	0	0
17. Other Federal Receipts (Dividends, Interest, etc.).....	0	2300.21
18. Transfers from Non-Federal and Levin Funds		
(a) Non-Federal Account (from Schedule H3).....	0	0
(b) Levin Funds (from Schedule H5)	0	0
(c) Total Transfers (add 18(a) and 18(b))..	0	0
19. Total Receipts (add Lines 11(d), 12, 13, 14, 15, 16, 17, and 18(c))..... ▶	56479.08	90082.3
20. Total Federal Receipts (subtract Line 18(c) from Line 19)..... ▶	56479.08	90082.3

DETAILED SUMMARY PAGE of Receipts

FEC Form 3X (Rev. 06/2004)

Page 3

Write or Type Committee Name

Many Individual Conservatives Helping Elect Leaders Everywhere (MICHELEPAC)

Report Covering the Period:

From:

 M = M / D = D / Y = Y - Y - Y
 08 / 01 / 2012

To:

 M = M / D = D / Y = Y - Y - Y
 08 / 31 / 2012

I. Receipts	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
11. Contributions (other than loans) From:		
(a) Individuals/Persons Other Than Political Committees		
(i) Itemized (use Schedule A).....	11209.79	28300.03
(ii) Unitemized.....	34155.11	65755.44
(iii) TOTAL (add Lines 11(a)(i) and (ii)).....▶	45364.9	94055.47
(b) Political Party Committees.....	0	0
(c) Other Political Committees (such as PACs).....	0	0
(d) Total Contributions (add Lines 11(a)(iii), (b), and (c)) (Carry Totals to Line 33, page 5).....▶	45364.9	94055.47
12. Transfers From Affiliated/Other Party Committees.....	0	0
13. All Loans Received.....	0	0
14. Loan Repayments Received.....	0	0
15. Offsets To Operating Expenditures (Refunds, Rebates, etc.) (Carry Totals to Line 37, page 5).....	30.38	39121.9
16. Refunds of Contributions Made to Federal Candidates and Other Political Committees.....	0	0
17. Other Federal Receipts (Dividends, Interest, etc.).....	1065.89	3366.1
18. Transfers from Non-Federal and Levin Funds		
(a) Non-Federal Account (from Schedule H3).....	0	0
(b) Levin Funds (from Schedule H5).....	0	0
(c) Total Transfers (add 18(a) and 18(b))..	0	0
19. Total Receipts (add Lines 11(d), 12, 13, 14, 15, 16, 17, and 18(c)).....▶	46461.17	136543.47
20. Total Federal Receipts (subtract Line 18(c) from Line 19).....▶	46461.17	136543.47

DETAILED SUMMARY PAGE of Receipts

FEC Form 3X (Rev. 06/2004)

Page 3

Write or Type Committee Name

Many Individual Conservatives Helping Elect Leaders Everywhere (MICHELEPAC)

Report Covering the Period:

From:

MM / DD / YYYY
09 / 01 / 2012

To:

MM / DD / YYYY
09 / 30 / 2012

I. Receipts	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
11. Contributions (other than loans) From:		
(a) Individuals/Persons Other Than Political Committees		
(i) Itemized (use Schedule A).....	6650	34950.03
(ii) Unitemized.....	17482.5	83237.94
(iii) TOTAL (add Lines 11(a)(i) and (ii))..... ▶	24132.5	118187.97
(b) Political Party Committees.....	0	0
(c) Other Political Committees (such as PACs).....	0	0
(d) Total Contributions (add Lines 11(a)(iii), (b), and (c)) (Carry Totals to Line 33, page 5)..... ▶	24132.5	118187.97
12. Transfers From Affiliated/Other Party Committees.....	0	0
13. All Loans Received.....	0	0
14. Loan Repayments Received.....	0	0
15. Offsets To Operating Expenditures (Refunds, Rebates, etc.) (Carry Totals to Line 37, page 5).....	0	39121.9
16. Refunds of Contributions Made to Federal Candidates and Other Political Committees.....	0	0
17. Other Federal Receipts (Dividends, Interest, etc.).....	330	3696.1
18. Transfers from Non-Federal and Levin Funds		
(a) Non-Federal Account (from Schedule H3).....	0	0
(b) Levin Funds (from Schedule H5).....	0	0
(c) Total Transfers (add 18(a) and 18(b))..	0	0
19. Total Receipts (add Lines 11(d), 12, 13, 14, 15, 16, 17, and 18(c))..... ▶	24462.5	161005.97
20. Total Federal Receipts (subtract Line 18(c) from Line 19)..... ▶	24462.5	161005.97

DETAILED SUMMARY PAGE of Receipts

FEC Form 3X (Rev. 06/2004)

Page 3

Write or Type Committee Name

Many Individual Conservatives Helping Elect Leaders Everywhere (MICHELEPAC)

Report Covering the Period:

From:

 M M / D D / Y Y Y Y Y Y
 10 / 01 / 2012

To:

 M M / D D / Y Y Y Y Y Y
 10 / 17 / 2012

I. Receipts	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
11. Contributions (other than loans) From:		
(a) Individuals/Persons Other Than Political Committees		
(i) Itemized (use Schedule A).....	16550	51500.03
(ii) Unitemized.....	41351.12	124589.06
(iii) TOTAL (add Lines 11(a)(i) and (ii))..... ▶	57901.12	176089.09
(b) Political Party Committees.....	0	0
(c) Other Political Committees (such as PACs).....	0	0
(d) Total Contributions (add Lines 11(a)(iii), (b), and (c)) (Carry Totals to Line 33, page 5)..... ▶	57901.12	176089.09
12. Transfers From Affiliated/Other Party Committees.....	0	0
13. All Loans Received.....	0	0
14. Loan Repayments Received.....	0	0
15. Offsets To Operating Expenditures (Refunds, Rebates, etc.) (Carry Totals to Line 37, page 5).....	0	39121.9
16. Refunds of Contributions Made to Federal Candidates and Other Political Committees.....	0	0
17. Other Federal Receipts (Dividends, Interest, etc.).....	0	3696.1
18. Transfers from Non-Federal and Levin Funds		
(a) Non-Federal Account (from Schedule H3).....	0	0
(b) Levin Funds (from Schedule H5).....	0	0
(c) Total Transfers (add 18(a) and 18(b))..	0	0
19. Total Receipts (add Lines 11(d), 12, 13, 14, 15, 16, 17, and 18(c))..... ▶	57901.12	218907.09
20. Total Federal Receipts (subtract Line 18(c) from Line 19)..... ▶	57901.12	218907.09

DETAILED SUMMARY PAGE of Receipts

FEC Form 3X (Rev. 06/2004)

Page 3

Write or Type Committee Name

Many Individual Conservatives Helping Elect Leaders Everywhere (MICHELEPAC)

Report Covering the Period:

From:

 M M / D D / Y Y Y Y
 10 / 18 / 2012

To:

 M M / D D / Y Y Y Y
 11 / 26 / 2012

I. Receipts	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
11. Contributions (other than loans) From:		
(a) Individuals/Persons Other Than Political Committees		
(i) Itemized (use Schedule A).....	3500	55000.03
(ii) Unitemized.....	7634.23	132223.29
(iii) TOTAL (add Lines 11(a)(i) and (ii)).....▶	11134.23	187223.32
(b) Political Party Committees.....	0	0
(c) Other Political Committees (such as PACs).....	0	0
(d) Total Contributions (add Lines 11(a)(iii), (b), and (c)) (Carry Totals to Line 33, page 5).....▶	11134.23	187223.32
12. Transfers From Affiliated/Other Party Committees.....	0	0
13. All Loans Received.....	0	0
14. Loan Repayments Received.....	0	0
15. Offsets To Operating Expenditures (Refunds, Rebates, etc.) (Carry Totals to Line 37, page 5).....	0	39121.9
16. Refunds of Contributions Made to Federal Candidates and Other Political Committees.....	0	0
17. Other Federal Receipts (Dividends, Interest, etc.).....	0	3696.1
18. Transfers from Non-Federal and Levin Funds		
(a) Non-Federal Account (from Schedule H3).....	0	0
(b) Levin Funds (from Schedule H5).....	0	0
(c) Total Transfers (add 18(a) and 18(b))..	0	0
19. Total Receipts (add Lines 11(d), 12, 13, 14, 15, 16, 17, and 18(c)).....▶	11134.23	230041.32
20. Total Federal Receipts (subtract Line 18(c) from Line 19).....▶	11134.23	230041.32

DETAILED SUMMARY PAGE of Receipts

FEC Form 3X (Rev. 06/2004)

Page 3

Write or Type Committee Name

Many Individual Conservatives Helping Elect Leaders Everywhere (MICHELEPAC)

Report Covering the Period:

From:

MM	DD	YYYY
11	27	2012

To:

MM	DD	YYYY
12	31	2012

I. Receipts	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
11. Contributions (other than loans) From:		
(a) Individuals/Persons Other Than Political Committees		
(i) Itemized (use Schedule A).....	1070	56070.03
(ii) Unitemized.....	2132	134355.29
(iii) TOTAL (add Lines 11(a)(i) and (ii)).....▶	3202	190425.32
(b) Political Party Committees.....	0	0
(c) Other Political Committees (such as PACs).....	0	0
(d) Total Contributions (add Lines 11(a)(iii), (b), and (c)) (Carry Totals to Line 33, page 5).....▶	3202	190425.32
12. Transfers From Affiliated/Other Party Committees.....	0	0
13. All Loans Received.....	0	0
14. Loan Repayments Received.....	0	0
15. Offsets To Operating Expenditures (Refunds, Rebates, etc.) (Carry Totals to Line 37, page 5).....	267.71	39389.61
16. Refunds of Contributions Made to Federal Candidates and Other Political Committees.....	0	0
17. Other Federal Receipts (Dividends, Interest, etc.).....	0	3696.1
18. Transfers from Non-Federal and Levin Funds		
(a) Non-Federal Account (from Schedule H3).....	0	0
(b) Levin Funds (from Schedule H5).....	0	0
(c) Total Transfers (add 18(a) and 18(b))..	0	0
19. Total Receipts (add Lines 11(d), 12, 13, 14, 15, 16, 17, and 18(c)).....▶	3469.71	233511.03
20. Total Federal Receipts (subtract Line 18(c) from Line 19).....▶	3469.71	233511.03

EXHIBIT 12

C&M Strategies

1617 Parkdale Circle North
Erie, CO 80516
303-834- [REDACTED]

Billing Date: 7/27/2011

Billing Cycle: June

Bill to:

Bachmann for President

Attn: Nancy Watkins
PO Box 25950
Woodbury, MN 55125

Date	Description	Hours	Hourly Rate	Total
6/15-6/30	Political and Fundraising Consulting	NA	NA	\$11,250
Total				\$11,250

Please Remit Payment to:

C&M Strategies
Attn: Guy Short
1617 Parkdale Circle North
Erie, CO 80516
303-834- [REDACTED]

BFP_000011

13-1274_0109

C&M Strategies

1617 Parkdale Circle North
Erie, CO 80516
303-834- [REDACTED]

Billing Date: 7/27/2011

Billing Cycle: July

Bill to:

Bachmann for President

Attn: Nancy Watkins
PO Box 25950
Woodbury, MN 55125

Date	Description	Hours	Hourly Rate	Total
7/1 - 7/31	Political and Fundraising Consulting	NA	NA	\$22,500
Total				\$22,500

Please Remit Payment to:

C&M Strategies
Attn: Guy Short
1617 Parkdale Circle North
Erie, CO 80516
303-834- [REDACTED]

INVOICE PAYMENT

DATE: 7/28/11 AMT: \$33,750.00

CLIENT AUTH: ✓ RWC AUTH: Ⓢ

GL#: 1727.00

FEC/DOE: fundraising consulting - June & July

SPECIAL INSTR: _____

contract/WA attached

BFP_000012

13-1274_0110

C&M Strategies

1617 Parkdale Circle North
Erie, CO 80516
303-834-████

Billing Date: /31/2011

Billing Cycle: August

Bill to:

Bachmann for President

Attn: Nancy Watkins
PO Box 25950
Woodbury, MN 55125

Date	Description	Hours	Hourly Rate	Total
8/1 - 8/31	Political and Fundraising Consulting	NA	NA	\$22,500
	Iowa Consulting (Additional approved by David)	NA	NA	\$3,330
Total				\$25,830

Please Remit Payment to:

C&M Strategies
Attn: Guy Short
1617 Parkdale Circle North
Erie, CO 80516
303-834-████

08/12/11

1,727.00

Fundraising Consulting

BFP_000013

13-1274_0111

C&M Strategies

1617 Parkdale Circle North
Erie, CO 80516
303-834-██████

Billing Date: 10/3/2011

Billing Cycle: September

Bill to:

Bachmann for President

Attn: Nancy Watkins
PO Box 25950
Woodbury, MN 55125

Date	Description	Hours	Hourly Rate	Total
9/1 - 9/31	Political and Fundraising Consulting	NA	NA	\$22,500
Total				\$22,500

Please Remit Payment to:

C&M Strategies
Attn: Guy Short
1617 Parkdale Circle North
Erie, CO 80516
303-834-██████

BFP_000014

13-1274_0112

NOV 03 REC'D

C&M Strategies

1617 Parkdale Circle North
Erie, CO 80516
303-834-[REDACTED]

Billing Date: 11/1/2011

Billing Cycle: October

Bill to:

Bachmann for President

Attn: Nancy Watkins
PO Box 25950
Woodbury, MN 55125

Date	Description	Hours	Hourly Rate	Total
10/1 - 10/31	Political and Fundraising Consulting	NA	NA	\$22,500
Total				\$22,500

Please Remit Payment to:

C&M Strategies
Attn: Guy Short
1617 Parkdale Circle North
Erie, CO 80516
303-834-[REDACTED]

1727.00
fundraising consulting

BFP_000015

13-1274_0113

EXHIBIT 13

SCHEDULE B-P **ITEMIZED DISBURSEMENTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER:
(check only one)

PAGE 1729 / 1981

☒ 23 ☐ 24 ☐ 25 ☐ 26 ☐ 27a
☐ 27b ☐ 28a ☐ 28b ☐ 28c ☐ 29

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NAME OF COMMITTEE (In Full)

Bachmann for President

Full Name (Last, First, Middle Initial)

A. C&M Strategies

Mailing Address 1617 Parkdale Circle, N.

City State Zip Code
Erie CO 80516

Purpose of Disbursement
fundraising consulting

Candidate Name

Category/
Type

Office Sought: ☐ House ☐ Senate ☐ President
Disbursement For: 2012
☒ Primary ☐ General
☐ Other (specify) ▼

State: District:

Date of Disbursement

MM / DD / YYYY
07 / 29 / 2011

Transaction ID : BAF55029FA1614897A65

Amount of Each Disbursement this Period

33750.00

Full Name (Last, First, Middle Initial)

B. C&M Strategies

Mailing Address 1617 Parkdale Circle, N.

City State Zip Code
Erie CO 80516

Purpose of Disbursement
fundraising consulting

Candidate Name

Category/
Type

Office Sought: ☐ House ☐ Senate ☐ President
Disbursement For: 2012
☒ Primary ☐ General
☐ Other (specify) ▼

State: District:

Date of Disbursement

MM / DD / YYYY
09 / 12 / 2011

Transaction ID : B0AE1EFABD27044A7A43

Amount of Each Disbursement this Period

25830.00

Full Name (Last, First, Middle Initial)

c. Campaign Services, LLC

Mailing Address P. O. Box 1=56271

City State Zip Code
Atlanta GA 30343

Purpose of Disbursement
campaign t-shirts

Candidate Name

Category/
Type

Office Sought: ☐ House ☐ Senate ☐ President
Disbursement For: 2012
☒ Primary ☐ General
☐ Other (specify) ▼

State: District:

Date of Disbursement

MM / DD / YYYY
08 / 09 / 2011

Transaction ID : BDC73B6EB5FC7490AB00

Amount of Each Disbursement this Period

15000.00

Subtotal Of Receipts This Page (optional).....

74580.00

Total This Period (last page this line number only).....

SCHEDULE B-P **ITEMIZED DISBURSEMENTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER:
(check only one)

PAGE 1996 / 2246

☒ 23 ☐ 24 ☐ 25 ☐ 26 ☐ 27a
☐ 27b ☐ 28a ☐ 28b ☐ 28c ☐ 29

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NAME OF COMMITTEE (In Full)

Bachmann for President

Full Name (Last, First, Middle Initial)

A. Brad Johnson Investments, LC

Mailing Address P. O. Box 13375

City State Zip Code
Des Moines IA 50310

Purpose of Disbursement
office rent

Candidate Name

Category/
Type

Office Sought: ☐ House ☐ Senate ☐ President
Disbursement For: 2012
☒ Primary ☐ General
☐ Other (specify) ▼

State: District:

Date of Disbursement

MM / DD / YYYY
12 / 30 / 2011

Transaction ID : B1550DE32EA8E43D4B1F

Amount of Each Disbursement this Period

5000.00

Full Name (Last, First, Middle Initial)

B. C&M Strategies

Mailing Address 1617 Parkdale Circle, N.

City State Zip Code
Erie CO 80516

Purpose of Disbursement
fundraising consulting

Candidate Name

Category/
Type

Office Sought: ☐ House ☐ Senate ☐ President
Disbursement For: 2012
☒ Primary ☐ General
☐ Other (specify) ▼

State: District:

Date of Disbursement

MM / DD / YYYY
10 / 11 / 2011

Transaction ID : B5E3C43B7D3574642BCF

Amount of Each Disbursement this Period

22500.00

Full Name (Last, First, Middle Initial)

C. C&M Strategies

Mailing Address 1617 Parkdale Circle, N.

City State Zip Code
Erie CO 80516

Purpose of Disbursement
fundraising consulting

Candidate Name

Category/
Type

Office Sought: ☐ House ☐ Senate ☐ President
Disbursement For: 2012
☒ Primary ☐ General
☐ Other (specify) ▼

State: District:

Date of Disbursement

MM / DD / YYYY
11 / 09 / 2011

Transaction ID : BE60D000D3F6449918AA

Amount of Each Disbursement this Period

22500.00

Subtotal Of Receipts This Page (optional).....

50000.00

Total This Period (last page this line number only).....

EXHIBIT 14

**SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS**Use separate schedule(s)
for each category of the
Detailed Summary PageFOR LINE NUMBER:
(check only one)

PAGE 11 OF 15

<input checked="" type="checkbox"/> 21b	<input type="checkbox"/> 22	<input type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25	<input type="checkbox"/> 26
<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c	<input type="checkbox"/> 29	<input type="checkbox"/> 30b

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

Many Individual Conservatives Helping Elect Leaders Everywhere (MICHELEPAC)

Full Name (Last, First, Middle Initial)

A. Campaign Solutions

Date of Disbursement

MM	DD	YYYY
07	21	2011

Mailing Address 117 N Saint Asaph Street

Transaction ID : SB21B-119392-37587-e

City	State	Zip Code
Alexandria	VA	22314-3109

Purpose of Disbursement
Fundraising: TM Expense

003

Amount of Each Disbursement this Period

Candidate Name

Category/
Type

43.84

Office Sought:	House	Disbursement For:	<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼
	Senate		
	President		

State: District:

Full Name (Last, First, Middle Initial)

B. C&M Strategies

Date of Disbursement

MM	DD	YYYY
07	11	2011

Mailing Address 1617 Parkdale Circle N

Transaction ID : SB21B-120182-37583-e

City	State	Zip Code
Erie	CO	80516-2402

Purpose of Disbursement
Fundraising Consulting

001

Amount of Each Disbursement this Period

Candidate Name

Category/
Type

2500

Office Sought:	House	Disbursement For:	<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼
	Senate		
	President		

State: District:

Full Name (Last, First, Middle Initial)

C. American Express

Date of Disbursement

MM	DD	YYYY
07	01	2011

Mailing Address PO Box 53852

Transaction ID : SB21B-120179-37580-e

City	State	Zip Code
Phoenix	AZ	85072-3852

Purpose of Disbursement
Fundraising: CC Fees

003

Amount of Each Disbursement this Period

Candidate Name

Category/
Type

2.32

Office Sought:	House	Disbursement For:	<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼
	Senate		
	President		

State: District:

SUBTOTAL of Disbursements This Page (optional).....▶

2546.16

TOTAL This Period (last page this line number only).....▶

SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS

 Use separate schedule(s)
 for each category of the
 Detailed Summary Page

 FOR LINE NUMBER:
 (check only one)

PAGE 17 OF 19

<input checked="" type="checkbox"/> 21b	<input type="checkbox"/> 22	<input type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25	<input type="checkbox"/> 26
<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c	<input type="checkbox"/> 28	<input type="checkbox"/> 30b

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NAME OF COMMITTEE (In Full)

Many Individual Conservatives Helping Elect Leaders Everywhere (MICHELEPAC)

Full Name (Last, First, Middle Initial)

A. RMLC

Mailing Address Two Riverbend

City	State	Zip Code
Lansdowne	VA	20176

 Purpose of Disbursement
 Direct Mail Fundraising

Candidate Name

 Category/
 Type

Office Sought:	<input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President	Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼
----------------	---	--

State: District:

Date of Disbursement

MM	DD	YYYY
08	02	2011

Transaction ID : SB21B-120515-37760-e

Amount of Each Disbursement this Period

810

Full Name (Last, First, Middle Initial)

B. Alliance BankMailing Address 115 5th St E
#55

City	State	Zip Code
St. Paul	MN	55101

 Purpose of Disbursement
 Bank Fees

Candidate Name

 Category/
 Type

Office Sought:	<input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President	Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼
----------------	---	--

State: District:

Date of Disbursement

MM	DD	YYYY
08	03	2011

Transaction ID : SB21B-5-37738-e

Amount of Each Disbursement this Period

26.95

Full Name (Last, First, Middle Initial)

C. C&M Strategies

Mailing Address 1617 Parkdale Circle N

City	State	Zip Code
Erie	CO	80516-2402

 Purpose of Disbursement
 Fundraising Consulting

Candidate Name

 Category/
 Type

Office Sought:	<input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President	Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼
----------------	---	--

State: District:

Date of Disbursement

MM	DD	YYYY
08	03	2011

Transaction ID : SB21B-120182-37742-e

Amount of Each Disbursement this Period

5000

SUBTOTAL of Disbursements This Page (optional).....▶

5836.95

TOTAL This Period (last page this line number only).....▶

SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS

 Use separate schedule(s)
 for each category of the
 Detailed Summary Page

 FOR LINE NUMBER:
 (check only one)

PAGE 14 OF 16

<input checked="" type="checkbox"/> 21b	<input type="checkbox"/> 22	<input type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25	<input type="checkbox"/> 26
<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c	<input type="checkbox"/> 29	<input type="checkbox"/> 30b

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NAME OF COMMITTEE (In Full)

Many Individual Conservatives Helping Elect Leaders Everywhere (MICHELEPAC)

Full Name (Last, First, Middle Initial)

A. C&M Strategies

Date of Disbursement

Mailing Address 1617 Parkdale Circle N

MM	DD	YYYY
09	01	2011

City	State	Zip Code
Erie	CO	80516-2402

Transaction ID : SB21B-120182-37831-e

 Purpose of Disbursement
 Fundraising: Fundraising Consulting

003

Amount of Each Disbursement this Period

Candidate Name

 Category/
 Type

5000

Office Sought:	House	Disbursement For:	<input type="checkbox"/> Primary	<input type="checkbox"/> General
	Senate		<input type="checkbox"/> Other (specify) ▼	
	President			

State: District:

Full Name (Last, First, Middle Initial)

B. Alliance Bank

Date of Disbursement

Mailing Address 115 5th St E
#55

MM	DD	YYYY
09	12	2011

City	State	Zip Code
St. Paul	MN	55101

Transaction ID : SB21B-5-37825-e

 Purpose of Disbursement
 Bank Fees

001

Amount of Each Disbursement this Period

Candidate Name

 Category/
 Type

15.03

Office Sought:	House	Disbursement For:	<input type="checkbox"/> Primary	<input type="checkbox"/> General
	Senate		<input type="checkbox"/> Other (specify) ▼	
	President			

State: District:

Full Name (Last, First, Middle Initial)

C. Cardinals FEC Compliance Services, PLC

Date of Disbursement

Mailing Address PO Box 4182

MM	DD	YYYY
09	20	2011

City	State	Zip Code
Saint Paul	MN	55104-0182

Transaction ID : SB21B-40443-37833-e

 Purpose of Disbursement
 Accounting Fees

001

Amount of Each Disbursement this Period

Candidate Name

 Category/
 Type

424

Office Sought:	House	Disbursement For:	<input type="checkbox"/> Primary	<input type="checkbox"/> General
	Senate		<input type="checkbox"/> Other (specify) ▼	
	President			

State: District:

SUBTOTAL of Disbursements This Page (optional).....▶

5439.03

TOTAL This Period (last page this line number only).....▶

SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS

 Use separate schedule(s)
 for each category of the
 Detailed Summary Page

 FOR LINE NUMBER:
 (check only one)

PAGE 9 OF 10

<input checked="" type="checkbox"/> 21b	<input type="checkbox"/> 22	<input type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25	<input type="checkbox"/> 26
<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c	<input type="checkbox"/> 29	<input type="checkbox"/> 30b

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NAME OF COMMITTEE (In Full)

Many Individual Conservatives Helping Elect Leaders Everywhere (MICHELEPAC)

Full Name (Last, First, Middle Initial)

A. C&M Strategies

Mailing Address 1617 Parkdale Circle N

City	State	Zip Code
Erie	CO	80516-2402

Purpose of Disbursement
Fundraising Consulting

001

Category/
Type

Candidate Name

 Office Sought: ☐ House
☐ Senate
☐ President

 Disbursement For:
☐ Primary ☐ General
☐ Other (specify) ▼

State: District:

Date of Disbursement

MM	DD	YYYY
10	12	2011

Transaction ID : SB21B-120182-37895-e

Amount of Each Disbursement this Period

5000

Full Name (Last, First, Middle Initial)

B. Campaign Solutions

Mailing Address 117 N Saint Asaph Street

City	State	Zip Code
Alexandria	VA	22314-3109

Purpose of Disbursement
Credit Card Fees

001

Category/
Type

Candidate Name

 Office Sought: ☐ House
☐ Senate
☐ President

 Disbursement For:
☐ Primary ☐ General
☐ Other (specify) ▼

State: District:

Date of Disbursement

MM	DD	YYYY
10	01	2011

Transaction ID : SB21B-119392-37903-e

Amount of Each Disbursement this Period

7879.14

Full Name (Last, First, Middle Initial)

C. PaysimpleMailing Address 1436 E 17th Avenue
Suite 300

City	State	Zip Code
Denver	CO	80216-1613

Purpose of Disbursement
Credit Card Fees

001

Category/
Type

Candidate Name

 Office Sought: ☐ House
☐ Senate
☐ President

 Disbursement For:
☐ Primary ☐ General
☐ Other (specify) ▼

State: District:

Date of Disbursement

MM	DD	YYYY
10	04	2011

Transaction ID : SB21B-120839-37892-e

Amount of Each Disbursement this Period

34.95

SUBTOTAL of Disbursements This Page (optional).....▶

12914.09

TOTAL This Period (last page this line number only).....▶

SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS

 Use separate schedule(s)
 for each category of the
 Detailed Summary Page

 FOR LINE NUMBER:
 (check only one)

PAGE 11 OF 16

<input checked="" type="checkbox"/> 21b	<input type="checkbox"/> 22	<input type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25	<input type="checkbox"/> 26
<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c	<input type="checkbox"/> 29	<input type="checkbox"/> 30b

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NAME OF COMMITTEE (In Full)

Many Individual Conservatives Helping Elect Leaders Everywhere (MICHELEPAC)

Full Name (Last, First, Middle Initial)

A. C&M Strategies

Date of Disbursement

MM	DD	YYYY
11	01	2011

Mailing Address 1617 Parkdale Circle N

Transaction ID : SB21B-120182-37948-e

City	State	Zip Code
Erie	CO	80516-2402

 Purpose of Disbursement
 Fundraising Consulting

Amount of Each Disbursement this Period

Candidate Name

Category/ Type

5000

Office Sought:	House	Disbursement For:	<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼
	Senate		
	President		

State: District:

Full Name (Last, First, Middle Initial)

B. Alliance Bank

Date of Disbursement

MM	DD	YYYY
11	22	2011

Mailing Address 115 5th St E
#55

Transaction ID : SB21B-5-37947-e

City	State	Zip Code
St. Paul	MN	55101

 Purpose of Disbursement
 Bank Fees

Amount of Each Disbursement this Period

Candidate Name

Category/ Type

9.26

Office Sought:	House	Disbursement For:	<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼
	Senate		
	President		

State: District:

Full Name (Last, First, Middle Initial)

C. Win Right Data Company, LLC

Date of Disbursement

MM	DD	YYYY
11	28	2011

Mailing Address 264 N Lumpkin Street
Suite 202

Transaction ID : SB21B-40616-37953-e

City	State	Zip Code
Athens	GA	30601-2832

 Purpose of Disbursement
 Direct Mail

Amount of Each Disbursement this Period

Candidate Name

Category/ Type

120

Office Sought:	House	Disbursement For:	<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼
	Senate		
	President		

State: District:

SUBTOTAL of Disbursements This Page (optional).....▶

5129.26

TOTAL This Period (last page this line number only).....▶

SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS

 Use separate schedule(s)
 for each category of the
 Detailed Summary Page

 FOR LINE NUMBER:
 (check only one)

PAGE 16 OF 16

<input checked="" type="checkbox"/> 21b	<input type="checkbox"/> 22	<input type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25	<input type="checkbox"/> 26
<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c	<input type="checkbox"/> 29	<input type="checkbox"/> 30b

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NAME OF COMMITTEE (In Full)

Many Individual Conservatives Helping Elect Leaders Everywhere (MICHELEPAC)

Full Name (Last, First, Middle Initial)

A. Win Right Data Company, LLC
 Mailing Address 264 N Lumpkin Street
 Suite 202

City	State	Zip Code
Athens	GA	30601-2832

 Purpose of Disbursement
 Website

Candidate Name

Office Sought:

☐ House
☐ Senate
☐ President

Disbursement For:

☐ Primary ☐ General
☐ Other (specify) ▼

State:

District:

Date of Disbursement

MM	DD	YYYY
11	28	2011

Transaction ID : SB21B-40616-37962-e

Amount of Each Disbursement this Period

Amount	75
--------	----

Full Name (Last, First, Middle Initial)

B. C&M Strategies

Mailing Address 1617 Parkdale Circle N

City	State	Zip Code
Erie	CO	80516-2402

 Purpose of Disbursement
 Fundraising Consulting

Candidate Name

Office Sought:

☐ House
☐ Senate
☐ President

Disbursement For:

☐ Primary ☐ General
☐ Other (specify) ▼

State:

District:

Date of Disbursement

MM	DD	YYYY
11	30	2011

Transaction ID : SB21B-120182-37949-e

Amount of Each Disbursement this Period

Amount	5000
--------	------

Full Name (Last, First, Middle Initial)

C.

Mailing Address

City	State	Zip Code
------	-------	----------

Purpose of Disbursement

Candidate Name

Office Sought:

☐ House
☐ Senate
☐ President

Disbursement For:

☐ Primary ☐ General
☐ Other (specify) ▼

State:

District:

Date of Disbursement

MM	DD	YYYY
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Amount of Each Disbursement this Period

Amount	
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SUBTOTAL of Disbursements This Page (optional).....▶

5075.00

TOTAL This Period (last page this line number only).....▶

20226.43

**SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS**Use separate schedule(s)
for each category of the
Detailed Summary PageFOR LINE NUMBER:
(check only one)

PAGE 13 OF 15

<input checked="" type="checkbox"/> 21b	<input type="checkbox"/> 22	<input type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25	<input type="checkbox"/> 26
<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c	<input type="checkbox"/> 29	<input type="checkbox"/> 30b

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NAME OF COMMITTEE (In Full)

Many Individual Conservatives Helping Elect Leaders Everywhere (MICHELEPAC)

Full Name (Last, First, Middle Initial)

A. Cardinals FEC Compliance Services, PLC

Mailing Address PO Box 4182

City	State	Zip Code
Saint Paul	MN	55104-0182

Purpose of Disbursement
Accounting and Reporting

Candidate Name

Office Sought:	Disbursement For:
<input type="checkbox"/> House	<input type="checkbox"/> Primary <input type="checkbox"/> General
<input type="checkbox"/> Senate	<input type="checkbox"/> Other (specify) ▼
<input type="checkbox"/> President	
State:	District:

Date of Disbursement

MM	DD	YYYY
12	20	2011

Transaction ID : SB21B-40443-38009-e

Amount of Each Disbursement this Period

826.5

Full Name (Last, First, Middle Initial)

B. C&M Strategies

Mailing Address 1617 Parkdale Circle N

City	State	Zip Code
Erie	CO	80516-2402

Purpose of Disbursement
Fundraising Consulting

Candidate Name

Office Sought:	Disbursement For:
<input type="checkbox"/> House	<input type="checkbox"/> Primary <input type="checkbox"/> General
<input type="checkbox"/> Senate	<input type="checkbox"/> Other (specify) ▼
<input type="checkbox"/> President	
State:	District:

Date of Disbursement

MM	DD	YYYY
12	06	2011

Transaction ID : SB21B-120182-38011-e

Amount of Each Disbursement this Period

20000

Full Name (Last, First, Middle Initial)

C. PaysimpleMailing Address 1436 E 17th Avenue
Suite 300

City	State	Zip Code
Denver	CO	80218-1613

Purpose of Disbursement
Credit Card Fees

Candidate Name

Office Sought:	Disbursement For:
<input type="checkbox"/> House	<input type="checkbox"/> Primary <input type="checkbox"/> General
<input type="checkbox"/> Senate	<input type="checkbox"/> Other (specify) ▼
<input type="checkbox"/> President	
State:	District:

Date of Disbursement

MM	DD	YYYY
12	02	2011

Transaction ID : SB21B-120839-38005-e

Amount of Each Disbursement this Period

5

SUBTOTAL of Disbursements This Page (optional)..... ▶

20831.50

TOTAL This Period (last page this line number only)..... ▶

SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS

 Use separate schedule(s)
 for each category of the
 Detailed Summary Page

 FOR LINE NUMBER:
 (check only one)

PAGE 6 OF 7

<input checked="" type="checkbox"/> 21b	<input type="checkbox"/> 22	<input type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25	<input type="checkbox"/> 26
<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c	<input type="checkbox"/> 29	<input type="checkbox"/> 30b

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NAME OF COMMITTEE (In Full)

Many Individual Conservatives Helping Elect Leaders Everywhere (MICHELEPAC)

Full Name (Last, First, Middle Initial)

A. Campaign Solutions

Mailing Address 117 N Saint Asaph Street

City	State	Zip Code
Alexandria	VA	22314-3109

 Purpose of Disbursement
 Credit Card Fees

001

Candidate Name

 Category/
 Type

Office Sought:	<input type="checkbox"/> House	Disbursement For:	<input type="checkbox"/> Primary	<input type="checkbox"/> General
	<input type="checkbox"/> Senate		<input type="checkbox"/> Other (specify) ▼	
	<input type="checkbox"/> President			

State: District:

Date of Disbursement

MM	DD	YYYY
01	04	2012

Transaction ID : SB21B-119392-38069-e

Amount of Each Disbursement this Period

654.32

Full Name (Last, First, Middle Initial)

B. United States Postal Service

Mailing Address 791 Currell Blvd

City	State	Zip Code
Woodbury	MN	55125

 Purpose of Disbursement
 Administrative/Salary/Overhead: Postage

001

Candidate Name

 Category/
 Type

Office Sought:	<input type="checkbox"/> House	Disbursement For:	<input type="checkbox"/> Primary	<input type="checkbox"/> General
	<input type="checkbox"/> Senate		<input type="checkbox"/> Other (specify) ▼	
	<input type="checkbox"/> President			

State: District:

Date of Disbursement

MM	DD	YYYY
01	04	2012

Transaction ID : SB21B-33303-38034-e

Amount of Each Disbursement this Period

300

Full Name (Last, First, Middle Initial)

C. C&M Strategies

Mailing Address 1617 Parkdale Circle N

City	State	Zip Code
Erie	CO	80516-2402

 Purpose of Disbursement
 Fundraising Consulting

001

Candidate Name

 Category/
 Type

Office Sought:	<input type="checkbox"/> House	Disbursement For:	<input type="checkbox"/> Primary	<input type="checkbox"/> General
	<input type="checkbox"/> Senate		<input type="checkbox"/> Other (specify) ▼	
	<input type="checkbox"/> President			

State: District:

Date of Disbursement

MM	DD	YYYY
01	03	2012

Transaction ID : SB21B-120182-38032-e

Amount of Each Disbursement this Period

20000

SUBTOTAL of Disbursements This Page (optional).....▶

20954.32

TOTAL This Period (last page this line number only).....▶

EXHIBIT 15

SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTSUse separate schedule(s)
for each category of the
Detailed Summary PageFOR LINE NUMBER:
(check only one)

PAGE 14 OF 24

<input checked="" type="checkbox"/> 21b	<input type="checkbox"/> 22	<input type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25	<input type="checkbox"/> 26
<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c	<input type="checkbox"/> 29	<input type="checkbox"/> 30b

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NAME OF COMMITTEE (In Full)

Many Individual Conservatives Helping Elect Leaders Everywhere (MICHELEPAC)

Full Name (Last, First, Middle Initial)

A. Southwest Publishing and Mailing Corporat

Mailing Address 2600 NW Topeka Boulevard

City	State	Zip Code
Topeka	KS	66617-1160

Purpose of Disbursement
Fundraising: Direct Mail

Candidate Name

003

Category/
Type

Office Sought:	<input type="checkbox"/> House
	<input type="checkbox"/> Senate
	<input type="checkbox"/> President

Disbursement For:	<input type="checkbox"/> Primary	<input type="checkbox"/> General
	<input type="checkbox"/> Other (specify) ▼	

State: District:

Date of Disbursement

MM	DD	YYYY
02	01	2011

Transaction ID : SB21B-40619-26918-e

Amount of Each Disbursement this Period

24959.95

Full Name (Last, First, Middle Initial)

B. C&M Strategies

Mailing Address 1617 Parkdale Circle N

City	State	Zip Code
Erie	CO	80516-2402

Purpose of Disbursement
Management Consulting

Candidate Name

001

Category/
Type

Office Sought:	<input type="checkbox"/> House
	<input type="checkbox"/> Senate
	<input type="checkbox"/> President

Disbursement For:	<input type="checkbox"/> Primary	<input type="checkbox"/> General
	<input type="checkbox"/> Other (specify) ▼	

State: District:

Date of Disbursement

MM	DD	YYYY
02	03	2011

Transaction ID : SB21B-120182-26933-e

Amount of Each Disbursement this Period

3185

Full Name (Last, First, Middle Initial)

C. MDI Imaging and Mail

Mailing Address 21955 Cascades Parkway

City	State	Zip Code
Dulles	VA	20166-9211

Purpose of Disbursement
Fundraising: Direct Mail

Candidate Name

003

Category/
Type

Office Sought:	<input type="checkbox"/> House
	<input type="checkbox"/> Senate
	<input type="checkbox"/> President

Disbursement For:	<input type="checkbox"/> Primary	<input type="checkbox"/> General
	<input type="checkbox"/> Other (specify) ▼	

State: District:

Date of Disbursement

MM	DD	YYYY
02	14	2011

Transaction ID : SB21B-40595-26898-e

Amount of Each Disbursement this Period

30450

SUBTOTAL of Disbursements This Page (optional)..... ➤

58594.95

TOTAL This Period (last page this line number only)..... ➤

SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS

 Use separate schedule(s)
 for each category of the
 Detailed Summary Page

 FOR LINE NUMBER:
 (check only one)

PAGE 21 OF 24

☒ 21b ☐ 22 ☐ 23 ☐ 24 ☐ 25 ☐ 26
☐ 27 ☐ 28a ☐ 28b ☐ 28c ☐ 29 ☐ 30b

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NAME OF COMMITTEE (in Full)

Many Individual Conservatives Helping Elect Leaders Everywhere (MICHELEPAC)

Full Name (Last, First, Middle Initial)

A. Saber Communications, Inc

Mailing Address 101 Washington Street

 City State Zip Code
 Falmouth VA 22405-2361

 Purpose of Disbursement
 Fundraising: Direct Mail

Candidate Name

003

Category/
Type
 Office Sought: ☐ House ☐ Senate ☐ President
 State: District:

 Disbursement For: ☐ Primary ☐ General
☐ Other (specify) ▼

Date of Disbursement

 MM / DD / YYYY
 02 / 23 / 2011

Transaction ID : SB21B-40607-26905-e

Amount of Each Disbursement this Period

3000

Full Name (Last, First, Middle Initial)

B. C&M Strategies

Mailing Address 1617 Parkdale Circle N

 City State Zip Code
 Erie CO 80516-2402

 Purpose of Disbursement
 Fundraising: Fundraising Consulting

Candidate Name

003

Category/
Type
 Office Sought: ☐ House ☐ Senate ☐ President
 State: District:

 Disbursement For: ☐ Primary ☐ General
☐ Other (specify) ▼

Date of Disbursement

 MM / DD / YYYY
 02 / 17 / 2011

Transaction ID : SB21B-120182-26951-e

Amount of Each Disbursement this Period

4500

Full Name (Last, First, Middle Initial)

C. Cardinals FEC Compliance Services, PLC

Mailing Address PO Box 4182

 City State Zip Code
 Saint Paul MN 55104-0182

 Purpose of Disbursement
 Accounting Fees

Candidate Name

001

Category/
Type
 Office Sought: ☐ House ☐ Senate ☐ President
 State: District:

 Disbursement For: ☐ Primary ☐ General
☐ Other (specify) ▼

Date of Disbursement

 MM / DD / YYYY
 02 / 17 / 2011

Transaction ID : SB21B-40443-26752-e

Amount of Each Disbursement this Period

2910

SUBTOTAL of Disbursements This Page (optional)..... ➤

10410.00

TOTAL This Period (last page this line number only)..... ➤

SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTSUse separate schedule(s)
for each category of the
Detailed Summary PageFOR LINE NUMBER:
(check only one)

PAGE 49 OF 61

<input checked="" type="checkbox"/> 21b	<input type="checkbox"/> 22	<input type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25	<input type="checkbox"/> 26
<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c	<input type="checkbox"/> 29	<input type="checkbox"/> 30b

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NAME OF COMMITTEE (In Full)

Many Individual Conservatives Helping Elect Leaders Everywhere (MICHELEPAC)

Full Name (Last, First, Middle Initial)

A. C&M Strategies

Mailing Address 1617 Parkdale Circle N

City	State	Zip Code
Erie	CO	80516-2402

Purpose of Disbursement
Fundraising: Fundraising Consulting

Candidate Name

003
Category/ Type

Office Sought:	House <input type="checkbox"/> Senate <input type="checkbox"/> President	Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼
State:	District:	

Date of Disbursement

MM	DD	YYYY
04	07	2011

Transaction ID : SB21B-120182-31010-e

Amount of Each Disbursement this Period

1627.4

Full Name (Last, First, Middle Initial)

B. Allegiance List Marketing

Mailing Address 430 E E Street

City	State	Zip Code
Purcellville	VA	20132-3319

Purpose of Disbursement
Fundraising Direct Mail

Candidate Name

001
Category/ Type

Office Sought:	House <input type="checkbox"/> Senate <input type="checkbox"/> President	Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼
State:	District:	

Date of Disbursement

MM	DD	YYYY
04	20	2011

Transaction ID : SB21B-40583-30989-e

Amount of Each Disbursement this Period

2000

Full Name (Last, First, Middle Initial)

C. American Express

Mailing Address PO Box 53852

City	State	Zip Code
Phoenix	AZ	85072-3852

Purpose of Disbursement
Fundraising Credit Card Fees

Candidate Name

003
Category/ Type

Office Sought:	House <input type="checkbox"/> Senate <input type="checkbox"/> President	Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼
State:	District:	

Date of Disbursement

MM	DD	YYYY
04	29	2011

Transaction ID : SB21B-120179-30984-e

Amount of Each Disbursement this Period

3.05

SUBTOTAL of Disbursements This Page (optional).....▶

3630.45

TOTAL This Period (last page this line number only).....▶

**SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS**Use separate schedule(s)
for each category of the
Detailed Summary PageFOR LINE NUMBER:
(check only one)

PAGE 50 OF 61

<input checked="" type="checkbox"/> 21b	<input type="checkbox"/> 22	<input type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25	<input type="checkbox"/> 26
<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c	<input type="checkbox"/> 29	<input type="checkbox"/> 30b

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NAME OF COMMITTEE (In Full)

Many Individual Conservatives Helping Elect Leaders Everywhere (MICHELEPAC)

Full Name (Last, First, Middle Initial)

A. C&M Strategies

Mailing Address 1617 Parkdale Circle N

City	State	Zip Code
Erie	CO	80516-2402

Purpose of Disbursement
Fundraising: Fundraising Consulting

003

Candidate Name

Category/
Type

Office Sought:	Disbursement For:
<input type="checkbox"/> House	<input type="checkbox"/> Primary <input type="checkbox"/> General
<input type="checkbox"/> Senate	<input type="checkbox"/> Other (specify) ▼
<input type="checkbox"/> President	

State: District:

Date of Disbursement

MM	DD	YYYY
04	11	2011

Transaction ID : SB21B-120182-31012-e

Amount of Each Disbursement this Period

9000

Full Name (Last, First, Middle Initial)

B. American Express

Mailing Address PO Box 53852

City	State	Zip Code
Phoenix	AZ	85072-3852

Purpose of Disbursement
Fundraising Credit Card Fees

003

Candidate Name

Category/
Type

Office Sought:	Disbursement For:
<input type="checkbox"/> House	<input type="checkbox"/> Primary <input type="checkbox"/> General
<input type="checkbox"/> Senate	<input type="checkbox"/> Other (specify) ▼
<input type="checkbox"/> President	

State: District:

Date of Disbursement

MM	DD	YYYY
04	15	2011

Transaction ID : SB21B-120179-30983-e

Amount of Each Disbursement this Period

3.04

Full Name (Last, First, Middle Initial)

C. American Express

Mailing Address PO Box 53852

City	State	Zip Code
Phoenix	AZ	85072-3852

Purpose of Disbursement
Fundraising Credit Card Fees

003

Candidate Name

Category/
Type

Office Sought:	Disbursement For:
<input type="checkbox"/> House	<input type="checkbox"/> Primary <input type="checkbox"/> General
<input type="checkbox"/> Senate	<input type="checkbox"/> Other (specify) ▼
<input type="checkbox"/> President	

State: District:

Date of Disbursement

MM	DD	YYYY
04	04	2011

Transaction ID : SB21B-120179-30974-e

Amount of Each Disbursement this Period

6.6

SUBTOTAL of Disbursements This Page (optional).....▶

9009.64

TOTAL This Period (last page this line number only).....▶

SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS

 Use separate schedule(s)
 for each category of the
 Detailed Summary Page

 FOR LINE NUMBER:
 (check only one)

PAGE 51 OF 61

☒ 21b ☐ 22 ☐ 23 ☐ 24 ☐ 25 ☐ 26
☐ 27 ☐ 28a ☐ 28b ☐ 28c ☐ 29 ☐ 30b

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NAME OF COMMITTEE (In Full)

Many Individual Conservatives Helping Elect Leaders Everywhere (MICHELEPAC)

Full Name (Last, First, Middle Initial)

A. C&M Strategies

Mailing Address 1617 Parkdale Circle N

 City State Zip Code
 Erie CO 80516-2402

 Purpose of Disbursement
 Fundraising: Fundraising Consulting

Candidate Name

 Office Sought: ☐ House ☐ Senate ☐ President
 State: District:
 Disbursement For: ☐ Primary ☐ General
☐ Other (specify) ▼

Date of Disbursement

 MM / DD / YYYY
 04 / 11 / 2011

Transaction ID : SB21B-120182-31011-e

Amount of Each Disbursement this Period

3000

Full Name (Last, First, Middle Initial)

B. Allegiance List Marketing

Mailing Address 430 E E Street

 City State Zip Code
 Purcellville VA 20132-3319

 Purpose of Disbursement
 Fundraising Direct Mail

Candidate Name

 Office Sought: ☐ House ☐ Senate ☐ President
 State: District:
 Disbursement For: ☐ Primary ☐ General
☐ Other (specify) ▼

Date of Disbursement

 MM / DD / YYYY
 04 / 20 / 2011

Transaction ID : SB21B-40583-30988-e

Amount of Each Disbursement this Period

2000

Full Name (Last, First, Middle Initial)

C. Win Right Data Company, LLC
 Mailing Address 264 N Lumpkin Street
 Suite 202

 City State Zip Code
 Athens GA 30601-2832

 Purpose of Disbursement
 Fundraising List Purchase

Candidate Name

 Office Sought: ☐ House ☐ Senate ☐ President
 State: District:
 Disbursement For: ☐ Primary ☐ General
☐ Other (specify) ▼

Date of Disbursement

 MM / DD / YYYY
 04 / 27 / 2011

Transaction ID : SB21B-40616-31005-e

Amount of Each Disbursement this Period

100

SUBTOTAL of Disbursements This Page (optional).....▶

5100.00

TOTAL This Period (last page this line number only).....▶

SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTSUse separate schedule(s)
for each category of the
Detailed Summary PageFOR LINE NUMBER:
(check only one)

PAGE 48 OF 61

<input checked="" type="checkbox"/> 21b	<input type="checkbox"/> 22	<input type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25	<input type="checkbox"/> 26
<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c	<input type="checkbox"/> 29	<input type="checkbox"/> 30b

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NAME OF COMMITTEE (In Full)

Many Individual Conservatives Helping Elect Leaders Everywhere (MICHELEPAC)

Full Name (Last, First, Middle Initial)

A. C&M Strategies

Mailing Address 1617 Parkdale Circle N

City	State	Zip Code
Erie	CO	80516-2402

Purpose of Disbursement
Fundraising: Fundraising Consulting

Candidate Name

003

Category/
TypeOffice Sought: ☐ House
☐ Senate
☐ PresidentDisbursement For: ☐ Primary ☐ General
☐ Other (specify) ▼

State: District:

Date of Disbursement

MM / DD / YYYY
04 / 19 / 2011

Transaction ID : SB21B-120182-31014-e

Amount of Each Disbursement this Period

1500

Full Name (Last, First, Middle Initial)

B. American Express

Mailing Address PO Box 53852

City	State	Zip Code
Phoenix	AZ	85072-3852

Purpose of Disbursement
Fundraising Credit Card Fees

Candidate Name

003

Category/
TypeOffice Sought: ☐ House
☐ Senate
☐ PresidentDisbursement For: ☐ Primary ☐ General
☐ Other (specify) ▼

State: District:

Date of Disbursement

MM / DD / YYYY
04 / 08 / 2011

Transaction ID : SB21B-120179-30978-e

Amount of Each Disbursement this Period

1.75

Full Name (Last, First, Middle Initial)

C. Allegiance List Marketing

Mailing Address 430 E E Street

City	State	Zip Code
Purcellville	VA	20132-3319

Purpose of Disbursement
Fundraising List Purchase

Candidate Name

001

Category/
TypeOffice Sought: ☐ House
☐ Senate
☐ PresidentDisbursement For: ☐ Primary ☐ General
☐ Other (specify) ▼

State: District:

Date of Disbursement

MM / DD / YYYY
04 / 20 / 2011

Transaction ID : SB21B-40583-31002-e

Amount of Each Disbursement this Period

625

SUBTOTAL of Disbursements This Page (optional).....▶

2126.75

TOTAL This Period (last page this line number only).....▶

**SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS**Use separate schedule(s)
for each category of the
Detailed Summary PageFOR LINE NUMBER:
(check only one)

PAGE 71 OF 78

<input checked="" type="checkbox"/> 21b	<input type="checkbox"/> 22	<input type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25	<input type="checkbox"/> 26
<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c	<input type="checkbox"/> 29	<input type="checkbox"/> 30b

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NAME OF COMMITTEE (In Full)

Many Individual Conservatives Helping Elect Leaders Everywhere (MICHELEPAC)

Full Name (Last, First, Middle Initial)

A. C&M Strategies

Mailing Address 1617 Parkdale Circle N

City	State	Zip Code
Erie	CO	80516-2402

Purpose of Disbursement
Fundraising: Fundraising Consulting

Candidate Name

003

Category/
Type

Office Sought:	House	Disbursement For:	<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼
	Senate		
	President		
State:	District:		

Date of Disbursement

MM	DD	YYYY
05	06	2011

Transaction ID : SB21B-120182-35348-e

Amount of Each Disbursement this Period

9175

Full Name (Last, First, Middle Initial)

B. Wesley Enos

Mailing Address 501 34th Avenue SW

City	State	Zip Code
Altoona	IA	50009-2634

Purpose of Disbursement
Management Consulting

Candidate Name

-01

Category/
Type

Office Sought:	House	Disbursement For:	<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼
	Senate		
	President		
State:	District:		

Date of Disbursement

MM	DD	YYYY
05	06	2011

Transaction ID : SB21B-88254-35346-e

Amount of Each Disbursement this Period

2310.07

Full Name (Last, First, Middle Initial)

C. The Richard Norman CompanyMailing Address 44084 Riverside Parkway
Suite 350

City	State	Zip Code
Lansdowne	VA	20176-6823

Purpose of Disbursement
Fundraising: Direct Mail Fundraising

Candidate Name

003

Category/
Type

Office Sought:	House	Disbursement For:	<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼
	Senate		
	President		
State:	District:		

Date of Disbursement

MM	DD	YYYY
05	20	2011

Transaction ID : SB21B-40802-35354-e

Amount of Each Disbursement this Period

300

SUBTOTAL of Disbursements This Page (optional).....▶

11785.07

TOTAL This Period (last page this line number only).....▶

**SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS**Use separate schedule(s)
for each category of the
Detailed Summary PageFOR LINE NUMBER:
(check only one)

PAGE 74 OF 78

☒ 21b ☐ 22 ☐ 23 ☐ 24 ☐ 25 ☐ 26
☐ 27 ☐ 28a ☐ 28b ☐ 28c ☐ 29 ☐ 30b

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NAME OF COMMITTEE (In Full)

Many Individual Conservatives Helping Elect Leaders Everywhere (MICHELEPAC)

Full Name (Last, First, Middle Initial)

A. McGill Consulting

Mailing Address 7643 S Bay Drive

City Bloomington State MN Zip Code 55438-2901

Purpose of Disbursement
Fundraising: Fundraising Consulting

Candidate Name

003

Category/
Type
Office Sought: ☐ House
☐ Senate
☐ President

Disbursement For:
☐ Primary ☐ General
☐ Other (specify) ▼

State: District:

Date of Disbursement

MM / DD / YYYY
05 / 13 / 2011

Transaction ID : SB21B-40644-35360-e

Amount of Each Disbursement this Period

250

Full Name (Last, First, Middle Initial)

B. C&M Strategies

Mailing Address 1617 Parkdale Circle N

City Erie State CO Zip Code 80516-2402

Purpose of Disbursement
Fundraising: Fundraising Consulting

Candidate Name

003

Category/
Type
Office Sought: ☐ House
☐ Senate
☐ President

Disbursement For:
☐ Primary ☐ General
☐ Other (specify) ▼

State: District:

Date of Disbursement

MM / DD / YYYY
05 / 18 / 2011

Transaction ID : SB21B-120182-35349-e

Amount of Each Disbursement this Period

4325

Full Name (Last, First, Middle Initial)

C. American Express

Mailing Address PO Box 53852

City Phoenix State AZ Zip Code 85072-3852

Purpose of Disbursement
Fundraising: Credit Card Fees

Candidate Name

003

Category/
Type
Office Sought: ☐ House
☐ Senate
☐ President

Disbursement For:
☐ Primary ☐ General
☐ Other (specify) ▼

State: District:

Date of Disbursement

MM / DD / YYYY
05 / 16 / 2011

Transaction ID : SB21B-120179-35369-e

Amount of Each Disbursement this Period

1.74

SUBTOTAL of Disbursements This Page (optional)..... ►

4576.74

TOTAL This Period (last page this line number only)..... ►

SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS

 Use separate schedule(s)
 for each category of the
 Detailed Summary Page

 FOR LINE NUMBER:
 (check only one)

PAGE 77 OF 78

<input checked="" type="checkbox"/> 21b	<input type="checkbox"/> 22	<input type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25	<input type="checkbox"/> 26
<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c	<input type="checkbox"/> 29	<input type="checkbox"/> 30b

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NAME OF COMMITTEE (In Full)

Many Individual Conservatives Helping Elect Leaders Everywhere (MICHELEPAC)

Full Name (Last, First, Middle Initial)

A. American Express

Mailing Address PO Box 53852

City	State	Zip Code
Phoenix	AZ	85072-3852

 Purpose of Disbursement
 Fundraising: Credit Card Fees

Candidate Name

003

Category/
Type

Office Sought:	Disbursement For:
<input type="checkbox"/> House	<input type="checkbox"/> Primary <input type="checkbox"/> General
<input type="checkbox"/> Senate	<input type="checkbox"/> Other (specify) ▼
<input type="checkbox"/> President	

State: District:

Date of Disbursement

MM	DD	YYYY
05	24	2011

Transaction ID : SB21B-120179-35373-e

Amount of Each Disbursement this Period

Amount
6.38

Full Name (Last, First, Middle Initial)

B. C&M Strategies

Mailing Address 1617 Parkdale Circle N

City	State	Zip Code
Erie	CO	80516-2402

 Purpose of Disbursement
 Fundraising: Fundraising Consulting

Candidate Name

003

Category/
Type

Office Sought:	Disbursement For:
<input type="checkbox"/> House	<input type="checkbox"/> Primary <input type="checkbox"/> General
<input type="checkbox"/> Senate	<input type="checkbox"/> Other (specify) ▼
<input type="checkbox"/> President	

State: District:

Date of Disbursement

MM	DD	YYYY
05	25	2011

Transaction ID : SB21B-120182-35350-e

Amount of Each Disbursement this Period

Amount
9000

Full Name (Last, First, Middle Initial)

C. Envision Marketing

Mailing Address PO Box 4275

City	State	Zip Code
Lynchburg	VA	24502-0275

 Purpose of Disbursement
 Fundraising: Direct Mail Fundraising

Candidate Name

003

Category/
Type

Office Sought:	Disbursement For:
<input type="checkbox"/> House	<input type="checkbox"/> Primary <input type="checkbox"/> General
<input type="checkbox"/> Senate	<input type="checkbox"/> Other (specify) ▼
<input type="checkbox"/> President	

State: District:

Date of Disbursement

MM	DD	YYYY
05	11	2011

Transaction ID : SB21B-40612-35355-e

Amount of Each Disbursement this Period

Amount
11655

SUBTOTAL of Disbursements This Page (optional).....▶

20661.38

TOTAL This Period (last page this line number only).....▶

SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS

 Use separate schedule(s)
 for each category of the
 Detailed Summary Page

 FOR LINE NUMBER:
 (check only one)

PAGE 75 OF 78

☒ 21b ☐ 22 ☐ 23 ☐ 24 ☐ 25 ☐ 26
☐ 27 ☐ 28a ☐ 28b ☐ 28c ☐ 29 ☐ 30b

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NAME OF COMMITTEE (In Full)

Many Individual Conservatives Helping Elect Leaders Everywhere (MICHELEPAC)

Full Name (Last, First, Middle Initial)

A. TK Loney & Son Printing

Mailing Address 1413 Juliet Avenue

 City State Zip Code
 Saint Paul MN 55105-2566

 Purpose of Disbursement
 Printing and Copying

Candidate Name

 Office Sought: ☐ House ☐ Senate ☐ President
 Disbursement For: ☐ Primary ☐ General
☐ Other (specify) ▼

State: District:

Date of Disbursement

 M M / D D / Y Y Y Y Y Y
 05 / 26 / 2011

Transaction ID : SB21B-116752-35362-e

Amount of Each Disbursement this Period

1359.83

Full Name (Last, First, Middle Initial)

B. American Express

Mailing Address PO Box 53852

 City State Zip Code
 Phoenix AZ 85072-3852

 Purpose of Disbursement
 Fundraising: Credit Card Fees

Candidate Name

 Office Sought: ☐ House ☐ Senate ☐ President
 Disbursement For: ☐ Primary ☐ General
☐ Other (specify) ▼

State: District:

Date of Disbursement

 M M / D D / Y Y Y Y Y Y
 05 / 20 / 2011

Transaction ID : SB21B-120179-35372-e

Amount of Each Disbursement this Period

1.75

Full Name (Last, First, Middle Initial)

C. C&M Strategies

Mailing Address 1617 Parkdate Circle N

 City State Zip Code
 Erie CO 80516-2402

 Purpose of Disbursement
 Fundraising: Fundraising Consulting

Candidate Name

 Office Sought: ☐ House ☐ Senate ☐ President
 Disbursement For: ☐ Primary ☐ General
☐ Other (specify) ▼

State: District:

Date of Disbursement

 M M / D D / Y Y Y Y Y Y
 05 / 31 / 2011

Transaction ID : SB21B-120182-35351-e

Amount of Each Disbursement this Period

1500

SUBTOTAL of Disbursements This Page (optional).....▶

2861.58

TOTAL This Period (last page this line number only).....▶

SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS

 Use separate schedule(s)
 for each category of the
 Detailed Summary Page

 FOR LINE NUMBER:
 (check only one)

PAGE 35 OF 54

☒ 21b ☐ 22 ☐ 23 ☐ 24 ☐ 25 ☐ 26
☐ 27 ☐ 28a ☐ 28b ☐ 28c ☐ 29 ☐ 30b

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NAME OF COMMITTEE (In Full)

Many Individual Conservatives Helping Elect Leaders Everywhere (MICHELEPAC)

Full Name (Last, First, Middle Initial)

A. C&M Strategies

Mailing Address 1617 Parkdale Circle N

 City State Zip Code
 Erie CO 80516-2402

 Purpose of Disbursement
 Fundraising: Fundraising Consulting

Candidate Name

003

Category/
Type
 Office Sought: ☐ House
☐ Senate
☐ President

 Disbursement For:
☐ Primary ☐ General
☐ Other (specify) ▼

State: District:

Date of Disbursement

MM / DD / YYYY
06 / 20 / 2011

Transaction ID : SB21B-120182-36989-e

Amount of Each Disbursement this Period

5750

Full Name (Last, First, Middle Initial)

B. PaysimpleMailing Address 1436 E 17th Avenue
Suite 300
 City State Zip Code
 Denver CO 80218-1613

 Purpose of Disbursement
 Fundraising: Credit Card Fees

Candidate Name

003

Category/
Type
 Office Sought: ☐ House
☐ Senate
☐ President

 Disbursement For:
☐ Primary ☐ General
☐ Other (specify) ▼

State: District:

Date of Disbursement

MM / DD / YYYY
06 / 02 / 2011

Transaction ID : SB21B-120839-37001-e

Amount of Each Disbursement this Period

34.95

Full Name (Last, First, Middle Initial)

C. Cardinals FEC Compliance Services, PLC

Mailing Address PO Box 4182

 City State Zip Code
 Saint Paul MN 55104-0182

 Purpose of Disbursement
 Accounting Fees

Candidate Name

001

Category/
Type
 Office Sought: ☐ House
☐ Senate
☐ President

 Disbursement For:
☐ Primary ☐ General
☐ Other (specify) ▼

State: District:

Date of Disbursement

MM / DD / YYYY
06 / 17 / 2011

Transaction ID : SB21B-40443-36994-e

Amount of Each Disbursement this Period

3885

SUBTOTAL of Disbursements This Page (optional).....▶

9669.95

TOTAL This Period (last page this line number only).....▶

SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS

 Use separate schedule(s)
 for each category of the
 Detailed Summary Page

 FOR LINE NUMBER:
 (check only one)

PAGE 6 OF 7

<input checked="" type="checkbox"/> 21b	<input type="checkbox"/> 22	<input type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25	<input type="checkbox"/> 26
<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c	<input type="checkbox"/> 29	<input type="checkbox"/> 30b

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NAME OF COMMITTEE (In Full)

Many Individual Conservatives Helping Elect Leaders Everywhere (MICHELEPAC)

Full Name (Last, First, Middle Initial)

A. Campaign Solutions

Mailing Address 117 N Saint Asaph Street

City	State	Zip Code
Alexandria	VA	22314-3109

 Purpose of Disbursement
 Credit Card Fees

001

Candidate Name

Category/
Type
 Office Sought: ☐ House
☐ Senate
☐ President

 Disbursement For:
☐ Primary ☐ General
☐ Other (specify) ▼

State: District:

Date of Disbursement

MM	DD	YYYY
01	04	2012

Transaction ID : SB21B-119392-38069-e

Amount of Each Disbursement this Period

654.32

Full Name (Last, First, Middle Initial)

B. United States Postal Service

Mailing Address 791 Currell Blvd

City	State	Zip Code
Woodbury	MN	55125

 Purpose of Disbursement
 Administrative/Salary/Overhead: Postage

001

Candidate Name

Category/
Type
 Office Sought: ☐ House
☐ Senate
☐ President

 Disbursement For:
☐ Primary ☐ General
☐ Other (specify) ▼

State: District:

Date of Disbursement

MM	DD	YYYY
01	04	2012

Transaction ID : SB21B-33303-38034-e

Amount of Each Disbursement this Period

300

Full Name (Last, First, Middle Initial)

C. C&M Strategies

Mailing Address 1617 Parkdale Circle N

City	State	Zip Code
Erie	CO	80516-2402

 Purpose of Disbursement
 Fundraising Consulting

001

Candidate Name

Category/
Type
 Office Sought: ☐ House
☐ Senate
☐ President

 Disbursement For:
☐ Primary ☐ General
☐ Other (specify) ▼

State: District:

Date of Disbursement

MM	DD	YYYY
01	03	2012

Transaction ID : SB21B-120182-38032-e

Amount of Each Disbursement this Period

20000

SUBTOTAL of Disbursements This Page (optional).....▶

20954.32

TOTAL This Period (last page this line number only).....▶

EXHIBIT 16

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Subject to the Nondisclosure Provisions of H. Res. 895 as Amended

OFFICE OF CONGRESSIONAL ETHICS
UNITED STATES HOUSE OF REPRESENTATIVES

MEMORANDUM OF INTERVIEW

IN RE: Former Senior Advisor for Coalitions
Bachmann for President
REVIEW No(s): 13-1274
DATE: March 26, 2013
LOCATION: 1100 G Street NW
Washington, DC
TIME: 3:08 p.m. to 4:20 p.m. (approximate)
PARTICIPANTS: Scott Gast
Paul Solis

SUMMARY: The OCE requested an interview with the witness and he consented to an interview. The witness made the following statements in response to our questioning:

1. The witness was given an 18 U.S.C. § 1001 warning and consented to an interview. The witness signed a written acknowledgement of the warning, which will be placed in the case file in this review.
2. The witness is a principal at Capitol City Partners, a public affairs and political consulting firm in Washington, DC. He has been with the firm for twelve years. His services include candidate, issue, and regulatory consulting. He specializes in coalition building.
3. The witness has been in this field since approximately 1989-90 and has worked on seven presidential campaigns, as well as numerous Senate and House campaigns.
4. The witness became involved with the Bachmann for President ("BFP") campaign after he was approached in March or April 2011 by Guy Short, Andy Parrish, and Ed Brookover.
5. The witness's understanding was that Guy Short was a consultant to Rep. Bachmann's leadership PAC, and that he was a "prolific" fundraiser. Andy Parrish was her congressional Chief of Staff. It appeared to the witness that Mr. Short was Rep. Bachmann's "outside operations" person and Mr. Parrish was her "inside operations" person. Mr. Brookover was a consultant to her congressional campaign.
6. Soon after speaking with Mr. Parrish, Mr. Short, and Mr. Brookover, the witness met with Rep. Bachmann in New York City and agreed to work for BFP. The witness had only a fleeting acquaintance with Rep. Bachmann prior to that meeting in New York, and he had no prior relationship with any of her political committees.
7. The witness was formally retained by BFP in May 2011 to provide strategic and political consulting services. The witness was paid \$7,500 per month for his services. His relationship with BFP ended when the campaign was suspended in January 2012.

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8. The witness said he spent a substantial amount of time on the ground in Iowa, and some time in South Carolina and New Hampshire, during the presidential campaign. He said he averaged about seven to eight days per month in Iowa until August, when he began spending more time in the state in preparation for the Iowa straw poll.
9. The witness stated he was not "in the chain of command" with respect to the hiring or compensation of BFP staff or consultants.
10. Once the presidential campaign got underway, the witness believes that Mr. Short was based in Colorado but worked at the BFP offices in Virginia and Iowa quite often. He believes that Mr. Parrish worked in Iowa virtually full-time. Eric Woolson joined BFP sometime after the Iowa straw poll, serving the Iowa campaign manager.
11. At the beginning of the presidential campaign, the witness talked to Rep. Bachmann "fairly often," maybe three times per week, offering her advice. He said that relations were good and she was accessible.
12. The witness said that after the Iowa straw poll, Rep. Bachmann became more isolated and that communications with her went through Keith Nahigian and Brett O'Donnell. The witness did not speak to Rep. Bachmann very often after the straw poll.
13. The witness stated that he thought Rep. Bachmann was signing off on major decisions early in the campaign. He stated that she was "definitely" involved in personnel decisions, noting his own experience, in which Mr. Short told him that his hiring was up to Rep. Bachmann. The witness further explained that, after the Iowa straw poll, Rep. Bachmann "wasn't totally hands off," but he did not get the impression that she was making day-to-day decisions.
14. The witness stated that Rep. Bachmann and Mr. Short had a "good and close" relationship, adding that Mr. Short was a good source for knowing what Rep. Bachmann was thinking.
15. The witness said that he did not have any interactions with Bachmann for Congress ("BFC") or MICHELE PAC while he was with BFP.
16. The witness said that he knew Mr. Short professionally prior to joining BFP through Mr. Short's position with the firm Wiland & Associates.
17. The witness said that he understood that Mr. Short was splitting his time between work for Rep. Bachmann's various political committees and his work for Wiland & Associates. He understood that Mr. Short supervised fundraising operations for BFP, BFC, and MICHELE PAC. He said that he believed Mr. Short supervised everything MICHELE PAC did.
18. The witness was not aware of the arrangements between Mr. Short and BFP or between Mr. Short and MICHELE PAC.
19. The witness said that sometime around October 1, 2011, BFP was experiencing a "financial crunch." He did not recall any request that staff or consultants defer compensation at this time.
20. The witness did not recall hearing Mr. Short saying he was working as a volunteer at this time.

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21. The witness said he was working more in Iowa during November and December 2011, spending approximately 15 days each month in the state.
22. The witness recalled that Mr. Short was also spending substantial time in Iowa in November and December 2011, noting that every time he worked in Iowa at that time, Mr. Short was also in Iowa. He did not have the impression that Mr. Short was working for other clients at this time. The witness added that Mr. Short was "clearly" the final authority on many campaign matters at this time.
23. When asked if Mr. Short could have done \$40,000 worth of work for other clients during the month of December 2011, given the time spent working on BFP matters, the witness stated that he would "find that surprising."
24. The witness was under the impression that Mr. Short recruited Kent Sorenson to join BFP. The witness said that Mr. Sorenson was "very active" with the campaign, and Rep. Bachmann was "very friendly" with Mr. Sorenson. He traveled with her when she was in Iowa.
25. The witness recalled traveling to Iowa in May 2011 to assist in scouting locations for Rep. Bachmann's presidential campaign announcement. Mr. Sorenson and Iowa BFP staff member Wes Enos picked him up from the airport. During that trip, Mr. Sorenson told the witness that, "I'm not doing this for free. I'm getting paid for it." The witness had the impression that Mr. Sorenson was bragging about his compensation for assisting BFP.
26. The witness recalled Mr. Sorenson telling him during the same conversation that payments directly from BFP would have put him in an "awkward" position.
27. Given this exchange, the witness had the impression that Mr. Sorenson was being paid by an entity other than BFP, but he did not know which entity.
28. The witness stated that he had heard that Mr. Sorenson was being paid \$7,500 per month but could not recall where he had heard this. The \$7,500 figure may have come up in his May 2011 conversation with Mr. Sorenson but he was not sure.
29. The witness stated that he did not know if Rep. Bachmann was aware of Mr. Sorenson's compensation arrangements. He did not discuss this with her.

This memorandum was prepared on April 1, 2013 after the interview was conducted on March 26, 2013. I certify that this memorandum contains all pertinent matter discussed with the witness on March 26, 2013.

Paul Solis
Investigative Counsel

EXHIBIT 17

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Subject to the Nondisclosure Provisions of H. Res. 895 as Amended

OFFICE OF CONGRESSIONAL ETHICS
UNITED STATES HOUSE OF REPRESENTATIVES

MEMORANDUM OF INTERVIEW

IN RE: Keith Nahigian
REVIEW No(s): 13-1274
DATE: April 22, 2013
LOCATION: 2550 M Street, NW, Washington, DC
TIME: 11:19 a.m. to 1:25 p.m. (approximate)
PARTICIPANTS: Scott Gast
Kedric L. Payne
D. Zachary Adams, counsel to the witness
William McGinley, counsel to the witness

SUMMARY: The OCE requested an interview with the witness and he consented to an interview. The witness made the following statements in response to our questioning:

1. The witness was given an 18 U.S.C. § 1001 warning and consented to an interview. The witness signed a written acknowledgement of the warning, which will be placed in the case file in this review.
2. The witness joined the Bachmann for President ("BFP") campaign after Bachmann political consultant Becki Donatelli approached him a few weeks prior to the launch of Rep. Bachmann's campaign to ask if he was working for any presidential campaign in this cycle.
3. Ms. Donatelli asked the witness to meet with Rep. Bachmann to learn more about her. The witness had an initial "get-to-know" meeting with Rep. Bachmann in early to mid-June 2011. The witness did not have a prior relationship with Rep. Bachmann. He then met with Rep. Bachmann's campaign manager Ed Rollins and others involved in starting the campaign.
4. After these initial meetings, the witness agreed to help with the launch of Rep. Bachmann's presidential campaign. He did not intend to continue working for BFP after the launch.
5. The witness described his role at this time as a senior advisor for strategy and communications. He was responsible for designing how Rep. Bachmann would launch her campaign, as well as a strategy for rolling out the campaign in the first few states Rep. Bachmann would visit.
6. After the launch of the campaign, Rep. Bachmann convinced the witness that she needed his help with the Iowa straw poll, which was in August. The witness believes that he agreed to remain with the campaign as an advisor for strategy and communications near the end of June.
7. The witness stated that he does not recall the amount of the retainer he received from BFP; he believes that his brother would have handled the retainer. The witness speculated that the retainer was probably \$15,000 to \$20,000 per month. The witness also stated that the pay arrangement may have been by project instead of a retainer.

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8. The witness stated that, following the Iowa straw poll, Rep. Bachmann wanted him to remain with the campaign. He recalled that Mr. Rollins asked him to meet, where he asked the witness to succeed him as campaign manager. The witness initially told Mr. Rollins that he would not take the position, but Rep. Bachmann and Mr. Rollins kept encouraging him to take the position.
9. The witness remembers that he accepted the position of national campaign manager sometime in September 2011, after Labor Day.
10. The witness stated that he did not discuss his compensation with Rep. Bachmann. The witness said that his compensation arrangements stayed the same after he became national campaign manager. In this new position, he reported to Rep. Bachmann.
11. The witness stated that his duties as campaign manager were to "right the ship" and "save" the campaign. As national campaign manager, he had authority to hire and fire BFP staff, and he approved payments made by BFP.
12. When he first became campaign manager, the witness asked Nancy Watkins, the campaign staff member responsible for making disbursements, to create spreadsheets of the campaign's income and payments to consultants for his approval. Initially, he sent many spreadsheets back to her with questions and requests for back-up documentation when he did not understand an expense.
13. The witness stayed on as campaign manager until the campaign was suspended after the Iowa caucuses in January 2012.
14. During the campaign, the witness interacted with Rep. Bachmann constantly. The witness believes that senior advisor Brett O'Donnell and press secretary Alice Stewart had the same level of interaction with Representative Bachman as he did. The witness stated that Guy Short did not have as much interaction with Rep. Bachmann because his activity did not require her approval. He added that he could have access to her when needed.
15. The witness told the OCE that Rep. Bachmann delegated a great deal of authority for running her presidential campaign, much more than she did in her congressional office. He explained that, early in the campaign, before Rep. Bachmann had a chance to get to know the staff, she wanted to approve everything. Later in the campaign, she felt less of a need to do so.
16. The witness said that Rep. Bachmann did know when new staff members joined the campaign because he would keep her informed.
17. The witness said that, during the presidential campaign, MICHELE PAC was "a separate entity." He stated that he did not know how it operated, who was running it, or what its finances were. He said he understood that the presidential campaign could not "use" the PAC.
18. The witness first met Mr. Short in or around June 2011; he had not heard of Mr. Short prior to joining BFP. The witness found it odd that he had never heard of Mr. Short before because he has heard of most people "in the industry."

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19. The witness is not familiar with C&M Strategies, but understands that it is Mr. Short's consulting firm. He does not know of other C&M Strategies clients. He noted that Mr. Short seemed to have a relationship with Ms. Donatelli that may have related to other clients.
20. The witness told the OCE that Representative Bachman has a comfort level with Mr. Short.
21. The witness described Mr. Short's duties for BFP as relating to online fundraising and tele-town halls. He noted that Mr. Short was named as the BFP National Political Director in November 2011, but that his duties did not change. The witness explained that the change in Mr. Short's title was primarily motivated by a desire to project an image of an organized, viable campaign.
22. The witness was not involved in BFP's initial retention of Mr. Short and is not aware of the terms of the consulting agreement with the campaign. He believes that he first became aware of the amount of C&M Strategies' retainer payment in or around September 2011, when he began reviewing and approving payments to various campaign vendors.
23. The witness could not recall the exact amount of the retainer payments for C&M Strategies, but believes that it could have been \$10,000, \$15,000, or \$20,000 per month. The witness said that Mr. Short's compensation did not change when his title changed in November 2011.
24. The witness recalled that in September 2011, he asked presidential campaign staff and vendors to let him know if they could make any sacrifices in compensation because he was trying to trim the budget where possible. He said that by the end of the campaign, the budget was not an issue.
25. The witness said that Mr. Short approached him in December 2011 and told him that he had "nothing to do" for the presidential campaign. The witness said that Mr. Short told him that he wanted to volunteer for the presidential campaign and go to work for MICHELE PAC.
26. The witness explained that one of Mr. Short's primary responsibilities was fundraising for the presidential campaign, and that it was not a good time to raise funds in December 2011 because of the approaching holidays. He added that most of Mr. Short's fundraising efforts would have been put into place by this time, given the often long lead time involved in such projects.
27. The witness said that Mr. Short did not really assist with BFP's field operations, despite his title as National Political Director, as he had limited political relationships and political skills.
28. The witness said that Mr. Short would not have told him whether he was going to be paid for his work for MICHELE PAC, as the witness had nothing to do with the PAC.
29. The witness said that when Mr. Short told him of his desire to focus on MICHELE PAC in December 2011, he told Mr. Short that that would be "great." He explained that Mr. Short would then be in a position to field the many calls from other candidates that Rep. Bachmann had been receiving, asking for her help with their campaigns.
30. The witness does not believe he spoke with Rep. Bachmann about Mr. Short's request, as it would have been odd for him to approach her about Mr. Short volunteering for the campaign and working for the PAC.

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31. The witness was shown a December 3, 2011 email from Mr. Short to the witness, in which Mr. Short asks him to approve a proposed fundraising solicitation for MICHELE PAC. The witness said that he thinks Mr. Short sent him this MICHELE PAC draft out of habit, but that he would have had no role in approving a PAC solicitation letter.
32. The witness said that he believes that this MICHELE PAC fundraising solicitation was “killed” and was never sent. He explained that the thought the solicitation seemed like that wrong thing at the wrong time, adding that December was not a good month for fundraising.
33. The witness does not recall discussing this email or the proposed solicitation with Mr. Short. He believes he may have ignored Mr. Short’s email. The witness said he never discussed the proposed solicitation with Rep. Bachmann.
34. The witness did not recall any other efforts undertaken by Mr. Short on behalf of MICHELE PAC that Mr. Short shared with him. The witness said that Mr. Short would have had no reason to run this stuff by him.
35. The witness stated that he does not know who had authority over MICHELE PAC’s activities or who would have overseen any work Mr. Short conducted for the PAC.
36. The witness was shown a December 6, 2011 email from Mr. Short to the witness, with the subject: “URGENT: Last Housefile before Iowa for approval,” in which Mr. Short asks for the witness’ approval of a fundraising solicitation letter for BFP. The witness said that he does not remember this email, but that it would have made sense for Mr. Short to seek the witness’ approval before spending BFP funds on postage.
37. The witness said that he believes that the BFP fundraising letter would have been created in November and that this December 6th email only concerned approval of postage costs.
38. The witness told the OCE that Mr. Short was not really part of BFP activities after this email.
39. The witness said that he was not aware of any invoices from C&M Strategies to MICHELE PAC in December 2011, nor was he aware of any payments by MICHELE PAC to C&M Strategies in December 2011 or January 2012. He said that he did not discuss either invoices to or payments from MICHELE PAC with Mr. Short. The witness again stated that he had no authority with respect to the PAC.
40. The witness said he first became aware of the December 2011/January 2012 payments from MICHELE PAC to C&M Strategies well after the Iowa caucuses, when certain payments were reported in the news media.
41. The witness said that, upon learning of the payments from MICHELE PAC to Mr. Short, he thought, “Really? We all worked for nothing, and he didn’t.” The witness believed it was “outrageous” that Mr. Short was being paid “when no one else was.”
42. The witness recalled that he was not a “fan” of Mr. Short because, during discussions about whether Rep. Bachmann should run for re-election to the House of Representatives in 2012, Mr. Short pushed her to run while the witness and others argued that she should not run for re-

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- election. The witness noted that Mr. Short's position may have been influenced by the money he would make from Rep. Bachmann's re-election efforts.
43. The witness first met Kent Sorenson at an event in New Hampshire in June 2011, on the same day that Rep. Bachmann announced her candidacy. He witness did not have a prior relationship with Mr. Sorenson. He does not know how Rep. Bachmann met Mr. Sorenson.
 44. According to the witness, the campaign expected Mr. Sorenson to be the presidential campaign's top political person in Iowa, working to garner support from elected officials and other leaders in the state. The witness recalled that Mr. Sorenson was not, however, very effective. The witness noted that he hired an Iowa campaign manager when he became national campaign manager, as he felt no one was running the campaign in that state.
 45. The witness said that Mr. Sorenson's duties included moderating tele-town hall meetings and occasionally traveling with Rep. Bachmann in Iowa.
 46. The witness stated that Mr. Sorenson was not compensated for his work on the campaign. He said that there were no conversations about compensating Mr. Sorenson, directly or indirectly, and that there were no conversations about compensating Mr. Sorenson through C&M Strategies.
 47. The witness said that Mr. Sorenson may have been reimbursed for certain expenses that he incurred for the campaign, and that he may have had a campaign credit card.
 48. The witness recalled that in December 2011, Mr. Sorenson told him that Rand Paul was offering to pay him a significant amount of money to work with his campaign. The witness did not have any discussion with Mr. Sorenson being paid by Representative Bachman's campaign.
 49. The witness stated that he was not aware of any compensation relationship between C&M Strategies and Mr. Sorenson. He stated that such an arrangement would have occurred before he became national campaign manager in September 2011.
 50. When asked whether he was aware of the \$22,500 per month retainer that BFP paid C&M Strategies, the witness stated that \$22,500 sounds like more than what he had approved.
 51. The witness recalled that he spoke to Mr. Short about making sacrifices for the campaign, similar to his conversations with all campaign staff. The witness could not recall whether Mr. Short may have submitted invoices to BFP that were less than the amount provided for in his contract.
 52. The witness said that his role with respect to Rep. Bachmann's book tour, for her book *Core of Conviction*, was to be a liaison with the publisher on behalf of the campaign. He added that his job was to provide "windows of time" to the publisher in which to conduct the book tour.
 53. The witness noted that the Iowa caucuses were originally scheduled to take place in February 2012, leaving time for a more expansive book tour. When the Iowa caucuses were rescheduled for January 2012, the time available for Rep. Bachmann to participate in a book tour was substantially limited. The witness described the book tour as a handful of "book stops," because the new compressed schedule eliminated approximately 90% of the original tour plans.

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54. The witness said he had a similar role relating to a book written by Senator John McCain during his presidential campaign in 2008. The witness said that, given this awareness, he consistently requested guidance from the campaign's legal counsel and the House Ethics Committee.
55. In his role as BFP's liaison to the publisher, the witness had an initial meeting with Adrian Zackheim, the head of the book publishing company. The witness' primary contact at the publisher was Allison McLean, as well as other people who worked for Ms. McLean. No one else from the campaign worked with the book company.
56. The witness said that book signing events were held in Minnesota, Iowa, and South Carolina. Rep. Bachmann also engaged in media appearances to promote the book in New York City.
57. The witness said that the publisher and book store employees were responsible for staffing book signing events. For events held outside of book stores, the publisher had hired a vendor who set-up and staffed these signing events.
58. The witness said that the publisher paid for a separate bus to transport Rep. Bachmann during the book tour. The campaign bus was not used during the book tour.
59. The witness traveled with Rep. Bachmann during most of the book tour in Iowa, but he did not necessarily attend the book signing events themselves. He stated that his purpose during the book tour was to handle the constant media questions about the campaign. He added that "the campaign never stops," and he needed to be with Rep. Bachmann to continue providing advice and to make decisions about the campaign.
60. The witness said that BFP press secretary Alice Stewart, senior advisor Brett O'Donnell, and staff member Tera Dahl also traveled with Rep. Bachmann on the book tour bus in Iowa. The witness said that Ms. Stewart would go in to each book signing event with Rep. Bachmann to ensure that any media present would direct inquiries through proper channels.
61. The witness said that the presidential campaign would sometimes have a campaign press conference with Rep. Bachmann outside of a book signing event. The witness said these press events were held "where appropriate" as "separate events" from the book signings.
62. The witness said that someone from the publisher either traveled with Rep. Bachmann during the book tour or was present at the book signing events in Iowa. He is not certain whether anyone from the publisher traveled with Representative Bachman in South Carolina.
63. The witness said that he does not believe that BFP made any payments to promote Rep. Bachmann's book. He said that the various payments made by the publisher or by the campaign would be reflected in documents provided to the OCE.
64. The witness was shown a November 16, 2011 email from Ms. McLean to the witness and others, with the subject, "expenses during the trip," in which Ms. McLean asks about how the witness wants to split expenses relating to the book tour. The witness stated that he wanted to reach an agreement regarding expenses that would "keep it clean." Rather than using certain percentages, he preferred to split expenses in a way that was "clean and easy."

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65. The witness said that the publisher was responsible for providing transportation during the book tour. He said that he "sent the campaign bus home" during the book tour, and the publisher paid for renting and wrapping a separate book bus and for all associated equipment. The book bus was used both in Iowa and in South Carolina. After the book tour, the campaign bus was returned to service.
66. The witness said that BFP would pay for initial flights and hotel charges since they "were going to Iowa." He believes the publisher was asked to pay for three flights taken by Rep. Bachmann and one assistant; the three flights were those in which Rep. Bachmann was traveling to a book signing event. The witness believes this may have included round-trip flights to New York for book-related media interviews, and one-way flights from Florida to South Carolina to begin the South Carolina leg of the book tour. The publisher was also responsible for paying for car service during the trip to New York.
67. The witness was asked about a November 16, 2011 email from Ms. McLean to the witness, in which Ms. McLean suggests that the publisher could not pay for all of the requested expenses. The witness recalled that he told Ms. McLean that the publisher must pay for those expenses; he believes that the publisher did, in fact, pay for those expenses.
68. The witness was shown a September 29, 2011 email from Ms. McLean to the witness and others, about an "email blast to Congresswoman Bachmann's supporters...about her new book." He was also shown a November 3, 2011 email from Rebecca Donatelli to Ms. McLean, in which Ms. Donatelli reports on the results of an email blast sent on November 2, 2011.
69. The witness recalled that the publisher sent several "email blasts" about Rep. Bachmann's book, but he does not remember any discussions about Penguin using BFP's email lists. He does not know whether the publisher paid to use any BFP email lists.
70. The witness said that nothing relating to the promotion of Rep. Bachmann's book was done without "really checking it out." He said all the promotional efforts were really scrutinized.
71. The witness was asked about a series of emails, dated November 25, 2011, between Mr. Short and Ms. Donatelli, on the subject of "URGENT: We need to do more on the book events turn out." In the emails, Mr. Short suggests sending a notice of the booking signing events to "the entire IA email list," and Ms. Donatelli reports that such an email was sent.
72. The witness said that if BFP's Iowa email list was used, it would have been "totally natural" to let Rep. Bachmann's supporters know of upcoming events and to get supporters to attend those events. He said that the campaign could not not tell supporters when Rep. Bachmann was going to be in their town. He said that such an email would be to notify "voters" of an opportunity to meet Rep. Bachmann, not to sell books. The email could have also been an effort to avoid numerous calls to the campaign headquarters asking for details about the book signing events.
73. The witness said BFP's list of media contacts were used to let the news media know where Representative Bachman was traveling during the book tour.
74. The witness said that the campaign could not "outsource" media scheduling completely, and required the publisher get pre-approval from the campaign for any media requests. The witness

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noted that because the date of the Iowa caucuses had been moved up, the book tour was occurring during a “weird” period of hyper communications activity.

75. The witness told the OCE that he was not aware of any coordination of efforts by BFP staff to engage in campaign activities at book signing events. He said that if Iowa campaign staff members did engage in campaign activities at these events, it seemed like a “natural effort” that would be undertaken for any large gathering of people. The witness said that individuals may have asked to volunteer at the book signing events.
76. When asked whether campaign literature or signs were ever distributed at book signing events, the witness responded that the campaign would not have had such materials inside the book signing events. He said that some attendees may have brought their own campaign materials to the book signing events to have them signed.
77. The witness was shown several pictures of individuals at book signing events in West Des Moines and Council Bluffs, Iowa. When asked about pictures that appeared to show campaign staff or volunteers signing up volunteers at the book signing events, the witness stated that, if they were signing up volunteers, it was being done outside of the book signing, in the hallway.
78. The witness further stated that he appeared in some of the pictures because he would sometimes walk into the event to get Rep. Bachmann to leave to stay on schedule. He also said that he attended several book signing events to monitor the attendees, because of concerns that opponents may try to disrupt the events.
79. When shown a picture of Rep. Bachmann holding a campaign sign at a book signing events, the witness told the OCE that he believes that attendees brought signs with them to the event to be signed. When shown a picture of Rep. Bachmann at a book signing next to a stack of campaign signs, the witness stated that there may have been another well-known person, whose name he could not recall, who may have been looking for something to sign for attendees and was using campaign signs.
80. He did not recall any campaign events interspersed between the book signings, noting that there were not a lot of moves or stops in the compressed tour. He stated that there had been no discussions about dividing the costs of the book bus between the campaign and the publisher, because he had tried to come up with a “clear and easy division” of expenses, rather than dividing expenses by a certain percentage.
81. The witness was shown an October 20, 2011 email from him to Ms. McLean, in which the witness discussed how to purchase copies of Rep. Bachmann’s book for the campaign. He said that the campaign wanted to buy books to give to donors and other supporters, but wanted to make sure they bought the books “at the right spot.” He said that he wanted to see if it was possible to buy books that would count toward moving the book onto bestseller lists. He said that this was early in the process, when he was just asking questions about what was possible, before he conferred with BFP legal counsel.

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82. The witness could not recall the source of books purchased by the campaign, but he believes they were purchased from the publisher. He said that this had been cleared through legal counsel and the House Ethics Committee, and that the campaign bought all its books from the same source.

83. The witness stated that he really tried his best to make the division between the presidential campaign and the book tour as clean and clear as humanly possible.

This memorandum was prepared on April 26, 2013 after the interview was conducted on April 22, 2013. I certify that this memorandum contains all pertinent matter discussed with the witness on April 22, 2013.

Kedric L. Payne
Deputy Chief Counsel

EXHIBIT 18

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Subject to the Nondisclosure Provisions of H. Res. 895 as Amended

OFFICE OF CONGRESSIONAL ETHICS
UNITED STATES HOUSE OF REPRESENTATIVES

MEMORANDUM OF INTERVIEW

IN RE: Brett O'Donnell
REVIEW No(s): 13-1274
DATE: April 19, 2013
LOCATION: 2550 M Street, NW, Washington, DC 20037
TIME: 10:00 a.m. to 11:30 a.m. (approximate)
PARTICIPANTS: Scott Gast
Omar S. Ashmawy
D. Zachary Adams, counsel to the witness
William McGinley, counsel to the witness

SUMMARY: The OCE requested an interview with the witness and he consented to an interview. The witness made the following statements in response to our questioning:

1. The witness was given an 18 U.S.C. § 1001 warning and consented to an interview. The witness signed a written acknowledgement of the warning, which will be placed in the case file in this review.
2. The witness is currently a private communications consultant with his own company, O'Donnell and Associates, a communications strategy firm for corporate, non-profit, and political clients. He has had this arrangement since 2005.
3. The witness served as an assistant professor of communications and debate coach at Liberty University from 1993 to 2008.
4. The witness' association with Rep. Bachmann's presidential campaign began in May 2011, when Bachmann consultant Ed Brookover called him to ask if he would be interested in working on a Bachmann campaign. The witness had no prior work relationship with Rep. Bachmann.
5. The witness met with Rep. Bachmann in mid- or late-May 2011, at which time they discussed what presidential debates are like and what she would have to do if she decided to run. Rep. Bachmann did not ask the witness to join her presidential campaign during the conversation. Rather, it was just a "getting to know you" conversation. They did not discuss the details of compensation or the specifics of hiring.
6. The witness was hired to serve as a communications strategist and advisor for Rep. Bachmann's presidential campaign. He was initially retained by Bachmann for Congress ("BFC") in late May 2011. In late June 2011, he switched to Bachmann for President ("BFP").
7. The witness said that Andy Parrish and Mr. Brookover negotiated his compensation. He explained that Mr. Parrish was Rep. Bachmann's congressional chief of staff, but he had taken a

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- leave of absence to work on the campaign. The witness had a written contract with BFP, which was arranged through the campaign's legal counsel.
8. The witness' compensation was \$12,000 per month plus expenses. When the witness switched to BFP, Mr. Rollins and he had a conversation about his compensation, but the amount of his compensation stayed the same.
 9. The witness told the OCE that there may have been a few months in which he took less in compensation because the campaign was struggling with money. He thinks those months were October and November of 2011. The witness did not remember the actual figures.
 10. Rep. Bachmann was not involved in the hiring of the witness except for the initial conversation he had with her. The witness had no conversation with Rep. Bachmann about his compensation.
 11. The witness' duties included preparing Rep. Bachmann for the first presidential debate, writing speeches, drafting press releases, and assisting with general communications activities with the BFP press secretary. The witness also worked on general campaign strategy with then-campaign manager Ed Rollins.
 12. Initially, the witness reported to Mr. Parrish, but later reported to the campaign manager, Mr. Rollins. When Mr. Rollins left the campaign, Keith Nahigian became campaign manager, so the witness reported to Mr. Nahigian and to Rep. Bachmann. The witness worked for BFP until the campaign was suspended after the Iowa caucuses in January 2012.
 13. After the presidential campaign, in April and May 2012, the witness worked for Rep. Bachmann's congressional office assisting with communications work, as Rep. Bachmann was bringing on a new Communications Director and the witness was helping with the transition. The witness was also hired by Rep. Bachmann for one month's work in October 2012 to help her prepare for a debate with her congressional opponent.
 14. During the presidential campaign, the witness worked primarily with Mr. Nahigian, Mr. Rollins, David Polyansky, and Tera Dahl. The witness had interactions with Guy Short, but less so than with the other individuals. Kent Sorenson would occasionally travel on the Bachmann campaign bus, but the witness had minimal interaction with him. The witness had minimal interaction with the BFP Iowa and South Carolina staff.
 15. The witness was based in Alexandria, Virginia, but traveled often. He said that he was with Rep. Bachmann 90% of the time. While with Rep. Bachmann, his time was all campaign related, working on strategy and preparation for debates, speeches, and media interviews.
 16. The witness interacted with Mr. Short less than 20% of the time. He said that Mr. Short was mostly focused on the campaign's mail and email activity.
 17. According to the witness, while everyone on the campaign ultimately reported to Rep. Bachmann, she was mostly concerned about the larger political aspects of the campaign. The witness did not observe her managing campaign finances, and he said that she did very little hiring and firing of campaign staff or vendors.

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18. The witness did not know if Rep. Bachmann approved major campaign decisions or major expenditures. She would approve strategic decisions such as events or speeches.
19. The witness had no interaction with MICHELE PAC, did not work for MICHELE PAC, and did not know about the activities of MICHELE PAC.
20. Regarding Bachmann for Congress, the witness knew that Mr. Parrish and Mr. Brookover represented the organization. The witness had no other interaction with Bachmann for Congress.
21. The witness had no relationship with Mr. Short until he first met him through their work on BFP. The witness knew that C&M Strategies was Mr. Short's firm, but knew nothing else about it. The witness did not know if anyone other than Mr. Short worked at C&M Strategies.
22. According to the witness, Mr. Short's role at BFP was related to mail, email, online fundraising, and the coordination of tele-town halls. The witness said that, toward the end of the campaign, in approximately November/December 2011, Mr. Short was in Iowa helping the Iowa staff.
23. When asked about Mr. Short's role after he was named BFP National Political Director, the witness said that titles within BFP did not mean very much. He said that Mr. Short was named National Political Director because, at that time, the campaign did not have one.
24. Asked if Mr. Short's duties changed when his title changed, the witness stated that "we were all hands on deck" at the time, preparing for the Iowa caucuses.
25. The witness said that he did not know how much of Mr. Short's time was spent on BFP activities, as the witness was traveling with Rep. Bachmann. The witness said that he did not see Mr. Short work on matters for other clients.
26. The witness was not aware of Mr. Short's consulting arrangements with BFP. The witness said he was not involved in negotiating the terms of Mr. Short's retention, and did not know how much Mr. Short was being paid.
27. The witness said that he did not have any conversations with Mr. Short about compensation and did not discuss with Mr. Short taking less salary because of the campaign's money shortage. The witness did not have any discussions during the campaign with Mr. Short about Mr. Short working as a volunteer near the end of the presidential campaign.
28. The witness was not aware of any compensation Mr. Short may have received from other Bachmann political entities.
29. The witness said that he was not aware of any fundraising project planned for MICHELE PAC in November or December 2011, and that he never discussed such a project with anyone.
30. The witness recalled a conversation he had with Mr. Nahigian in late December 2011 in Iowa or South Carolina, in which he and Mr. Nahigian were commiserating about compensation. They were discussing how much other BFP consultants and staff members were being paid – information they had learned from FEC reports. Mr. Nahigian told the witness that Mr. Short paid himself out of the PAC. Mr. Nahigian said something like "Yeah, Guy Short wrote himself

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- a check for \$25,000 out of the PAC.” The witness did not know if the payments Mr. Nahigian referred to was for work on the presidential campaign.
31. The witness was surprised by how much certain campaign staff was getting paid. When asked who, the witness stated Mr. Rollins and others. Asked if Mr. Short was one of the people he was surprised about, the witness stated that he did not remember.
 32. The witness did not have any conversation with Rep. Bachmann about Mr. Short writing himself a check from the PAC.
 33. In late February or early March 2012, the witness did some work for Rep. Bachmann, primarily consisting of writing speeches, for which he was not paid. The witness said that when he told Mr. Pollack that he wanted to be paid for this work, Mr. Pollack told him that he understood the witness to have been working as a volunteer. The witness said he told Mr. Pollack that Mr. Short had written himself a check from the PAC. He did not recall Mr. Pollack’s response.
 34. The witness was shown a March 9, 2012 email from Mr. Short to the witness, BFP National Finance Chairman James Pollack, and BFP legal counsel, in which Mr. Short forwarded a *Politico* report about payments Mr. Short received from MICHELE PAC in December 2011 and January 2012. The witness said that this email was the first time he became aware that there may have been an issue with Mr. Short.
 35. At some point after receiving the email, Mr. Pollock conducted a conference call with the witness and Mr. Short, to discuss how to respond to the *Politico* story. Mr. Short was tasked with drafting a statement to respond to the story and to email it to the call participants.
 36. After the witness received the draft statement from Mr. Short, he believes he called Mr. Short or Mr. Short called him; during the call, the witness told Mr. Short that the statement was fine.
 37. The witness said that this was the first time he became aware that Mr. Short had worked as a volunteer during the presidential campaign. The witness said he took Mr. Short “at his word” when he read the explanation Mr. Short provided for the payments.
 38. The witness said he was not aware of any other actions taken after the reports of the PAC payments appeared in the press.
 39. The witness was asked about the statement in the email that, “Andy cares.” The witness believes that the “Andy” Mr. Short referred to was Mr. Parrish, who the witness said had been “making trouble” for Rep. Bachmann around this time.
 40. Asked about evidence suggesting that Mr. Short was unhappy with things the witness was saying behind Mr. Short’s back, the witness state that he didn’t know. He and Mr. Short had one disagreement about a greenroom for a debate in 2011. Other than that, they had no disagreements.
 41. The witness told the OCE that the first time he met Mr. Sorenson was through the Bachmann for President campaign. He met him in New Hampshire when Mr. Sorenson attended a debate. The witness said he had an amicable relationship Mr. Sorenson.

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42. The witness did not know how Mr. Sorenson came to be involved in the presidential campaign. He was already the Iowa state chairman or lined up to be when the witness came on board.
43. The witness did not know about Mr. Short's relationship with Mr. Sorenson or if they had a pre-existing relationship before the campaign.
44. The witness said that, as Iowa state chairman, Mr. Sorenson was responsible for overseeing the philosophy and nature of the Iowa campaign and for outreach to local political leaders.
45. The witness did not know if Mr. Sorenson was compensated. He was not involved in any discussions regarding compensation of Mr. Sorenson, or whether it would be permissible to pay Mr. Sorenson.
46. The witness said he had heard a rumor during the campaign that Mr. Short was paying Mr. Sorenson, but the witness did not follow up on the rumor. He did not recall how he had heard the rumor or the context in which he heard the rumor.
47. The witness said that he had no role in Rep. Bachmann's book tour. He did not arrange or have any input into the book tour schedule, nor did he have any knowledge of the arrangements between Rep. Bachmann and the book publisher.
48. The witness said he was not given any guidance as to the rules relating to book tours.
49. The witness traveled with Rep. Bachmann for some of the book tour. He believes his travel during the book tour was in South Carolina and a trip to New York. He does not believe he was at any of the book tour events in Iowa.
50. During the book tour, Rep. Bachmann and staff used a separate book tour bus, not the campaign bus. From time to time, a representative from the publisher traveled on the bus. Mr. Nahigian, Ms. Dahl, and Ms. Stewart were the campaign staff members who most regularly traveled on the book bus during the book tour.
51. The witness said he may have attended approximately ten book signing events. He said that the book signing events were interspersed with campaign events.
52. The witness's understanding was that the publisher paid for the book tour bus. His understanding is based on conversations with Mr. Nahigian.
53. The witness said that the media was sometimes at book signing events. His job was to assist with media as it related to the campaign.
54. The witness said that book store employees staffed Rep. Bachmann's book signing events. Asked if campaign staff had any role at book signing events, the witness stated, "Not formally." They were not given any formal duties, but there were around. From time to time they would "pitch in" if there was a large crowd.
55. The witness said that no Bachmann for President signs or literature were handed out at the book signing events he attended. He said that he did not think that anyone signed up volunteers for the campaign at the book signing events.

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56. The witness said that campaign events were interspersed throughout the book tour. He said that they might do a book signing at a book store and then do a speech at a Rotary event. He said that there may have been a fundraising event, but he did not recall a specific event. He did recall that Rep. Bachmann had meetings with elected officials during the book tour. The witness said that they also prepared for debates and speeches while traveling on the book tour bus.
57. The witness had no knowledge about the campaign buying copies of Rep. Bachmann's book. He did recall a fundraising email that was sent out, offering a copy of the book to individuals who made contributions to the campaign.

This memorandum was prepared on April 29, 2013 after the interview was conducted on April 19, 2013. I certify that this memorandum contains all pertinent matter discussed with the witness on April 19, 2013.

Scott Gast
Investigative Counsel

EXHIBIT 19

SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS

 Use separate schedule(s)
 for each category of the
 Detailed Summary Page

 FOR LINE NUMBER:
 (check only one)

PAGE 13 OF 15

☒ 21b ☐ 22 ☐ 23 ☐ 24 ☐ 25 ☐ 26
☐ 27 ☐ 28a ☐ 28b ☐ 28c ☐ 29 ☐ 30b

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

Many Individual Conservatives Helping Elect Leaders Everywhere (MICHELEPAC)

Full Name (Last, First, Middle Initial)

A. Cardinals FEC Compliance Services, PLC

Mailing Address PO Box 4182

 City State Zip Code
 Saint Paul MN 55104-0182

 Purpose of Disbursement
 Accounting and Reporting

Candidate Name

 Office Sought: ☐ House
☐ Senate
☐ President

 Disbursement For:
☐ Primary ☐ General
☐ Other (specify) ▼

State: District:

Date of Disbursement

12 / 20 / 2011

Transaction ID : SB21B-40443-38009-e

Amount of Each Disbursement this Period

826.5

Full Name (Last, First, Middle Initial)

B. C&M Strategies

Mailing Address 1617 Parkdale Circle N

 City State Zip Code
 Erie CO 80516-2402

 Purpose of Disbursement
 Fundraising Consulting

Candidate Name

 Office Sought: ☐ House
☐ Senate
☐ President

 Disbursement For:
☐ Primary ☐ General
☐ Other (specify) ▼

State: District:

Date of Disbursement

12 / 06 / 2011

Transaction ID : SB21B-120182-38011-e

Amount of Each Disbursement this Period

20000

Full Name (Last, First, Middle Initial)

C. Paysimple
 Mailing Address 1436 E 17th Avenue
 Suite 300

 City State Zip Code
 Denver CO 80216-1613

 Purpose of Disbursement
 Credit Card Fees

Candidate Name

 Office Sought: ☐ House
☐ Senate
☐ President

 Disbursement For:
☐ Primary ☐ General
☐ Other (specify) ▼

State: District:

Date of Disbursement

12 / 02 / 2011

Transaction ID : SB21B-120839-38005-e

Amount of Each Disbursement this Period

5

SUBTOTAL of Disbursements This Page (optional).....▶

20831.50

TOTAL This Period (last page this line number only).....▶

EXHIBIT 20

SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS

 Use separate schedule(s)
 for each category of the
 Detailed Summary Page

 FOR LINE NUMBER:
 (check only one)

PAGE 6 OF 7

<input checked="" type="checkbox"/> 21b	<input type="checkbox"/> 22	<input type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25	<input type="checkbox"/> 26
<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c	<input type="checkbox"/> 29	<input type="checkbox"/> 30b

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

Many Individual Conservatives Helping Elect Leaders Everywhere (MICHELEPAC)

Full Name (Last, First, Middle Initial)

A. Campaign Solutions

Mailing Address 117 N Saint Asaph Street

City	State	Zip Code
Alexandria	VA	22314-3109

 Purpose of Disbursement
 Credit Card Fees

001

Candidate Name

Category/
Type

Office Sought:

☐ House
☐ Senate
☐ President

Disbursement For:

☐ Primary ☐ General
☐ Other (specify) ▼

State:

District:

Date of Disbursement

MM	DD	YYYY
01	04	2012

Transaction ID : SB21B-119392-38069-e

Amount of Each Disbursement this Period

654.32

Full Name (Last, First, Middle Initial)

B. United States Postal Service

Mailing Address 791 Currell Blvd

City	State	Zip Code
Woodbury	MN	55125

 Purpose of Disbursement
 Administrative/Salary/Overhead: Postage

001

Candidate Name

Category/
Type

Office Sought:

☐ House
☐ Senate
☐ President

Disbursement For:

☐ Primary ☐ General
☐ Other (specify) ▼

State:

District:

Date of Disbursement

MM	DD	YYYY
01	04	2012

Transaction ID : SB21B-33303-38034-e

Amount of Each Disbursement this Period

300

Full Name (Last, First, Middle Initial)

C. C&M Strategies

Mailing Address 1617 Parkdale Circle N

City	State	Zip Code
Erie	CO	80516-2402

 Purpose of Disbursement
 Fundraising Consulting

001

Candidate Name

Category/
Type

Office Sought:

☐ House
☐ Senate
☐ President

Disbursement For:

☐ Primary ☐ General
☐ Other (specify) ▼

State:

District:

Date of Disbursement

MM	DD	YYYY
01	03	2012

Transaction ID : SB21B-120182-38032-e

Amount of Each Disbursement this Period

20000

SUBTOTAL of Disbursements This Page (optional).....▶

20954.32

TOTAL This Period (last page this line number only).....▶

EXHIBIT 21

Holland & Knight

800 17th Street, NW, Suite 1100 | Washington, DC 20006 | T 202.955. [REDACTED] | F 202.955.5564
Holland & Knight LLP | www.hklaw.com

Christopher DeLacy
(202) 457- [REDACTED]
[REDACTED]@hklaw.com

April 24, 2013

Omar S. Ashmawy
Staff Director and Chief Counsel
Office of Congressional Ethics
U.S. House of Representatives
425 3rd Street, SW
Suite 1110
Washington, DC 20024

Re: Response of Guy Short and C&M Strategies, Inc.

Dear Mr. Ashmawy:

This response is submitted on behalf of Guy Short and C&M Strategies, Inc. (C&M) with respect to the January 30, 2012 Request for Information (RFI) and April 1, 2013 supplemental RFI sent by the Office of Congressional Ethics (OCE). As you are aware, the Federal Election Commission (FEC) is currently investigating what appears to be the exact same activity as the OCE. Although neither Guy Short nor C&M are subject to the Rules of the U.S. House of Representatives, the information is voluntarily being provided as a courtesy to the OCE.

Background

Guy Short is a political consultant and longtime advisor to Congresswoman Michele Bachmann and her political committees. Mr. Short is the principal of C&M, a political consulting company organized under Colorado law on June 3, 2010 and based in Erie, Colorado. During 2011 and 2012, Mr. Short provided services to both Many Individual Conservatives Helping Elect Leaders Everywhere Political Action Committee (MichelePAC) and Bachmann for President (BFP). During 2011, Guy Short, through C&M, retained Iowa State Senator Kent Sorenson, through Grassroots Strategy, Inc. (Grassroots).

Guy Short and C&M were not involved in any unauthorized, improper or illegal activities related to Congresswoman Bachmann, BFP, or MichelePAC. In addition, Mr. Short is not aware of any improper or illegal activities related to Congresswoman Bachmann, BFP, or MichelePAC.

MichelePAC and Bachmann for President

There is no written consulting, retention, or other agreement between C&M or Mr. Short and MichelePAC. During 2011 and 2012, Mr. Short provided consulting services to both MichelePAC and BFP. Individuals are permitted to provide services to both leadership PACs and campaign committees at the same time, and to be compensated by both, so long as they are

performing separate work for each committee and properly invoicing each committee. At all times, Mr. Short was cognizant as to whether he was working for MichelePAC or BFP. The services Mr. Short provided to each of these committees was authorized, documented appropriately, and properly invoiced. During December 2011 and January 2012, Mr. Short was paid by MichelePAC for a fundraising and research project, which was unrelated to his work for BFP. Mr. Short did not discuss this fundraising project with Congresswoman Bachmann. Mr. Short is not aware of any occasion when MichelePAC paid for services performed for BFP or vice versa.

Kent Sorenson

There is no written consulting, retention, or other agreement between C&M or Mr. Short and Kent Sorenson. As part of the services provided to Congresswoman Bachmann and her political committees in 2011, Mr. Short, through C&M, retained the consulting services of Mr. Sorenson, through Grassroots. Mr. Short did not discuss Mr. Sorenson's compensation with Congresswoman Bachmann. There is nothing illegal, improper, or unusual about a political consultant retaining the services of another political consultant. In fact, this arrangement is indistinguishable from thousands of other subcontractor/contractor or vendor/sub-vendor arrangements involving services provided to political committees. Although Mr. Short was not responsible for FEC compliance or reporting for MichelePAC or BFP, he is not aware of any attempt by MichelePAC or BFP to avoid FEC disclosure of payments made to Mr. Sorenson.

Conclusion

Clearly, the FEC is a more appropriate forum for inquiries involving federal campaign finance law, especially if no Member, officer, or employee of the House was personally involved in the alleged violation. It is my sincere hope that the OCE Board will take this into account when making recommendations to the House Ethics Committee.

Sincerely yours,

HOLLAND & KNIGHT LLP



Christopher DeLacy

EXHIBIT 22

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OFFICE OF CONGRESSIONAL ETHICS
UNITED STATES HOUSE OF REPRESENTATIVES

MEMORANDUM OF INTERVIEW

IN RE: Former Iowa Campaign Manager
Bachmann for President
REVIEW No(s): 13-1274
DATE: March 29, 2013
LOCATION: West Des Moines, IA
TIME: 9:58 AM to 11:42 AM (approximate)
PARTICIPANTS: Scott Gast
Kedric Payne

SUMMARY: The OCE requested an interview with the witness and he consented to an interview. The witness made the following statements in response to our questioning:

1. The witness was given an 18 U.S.C. § 1001 warning and consented to an interview. The witness signed a written acknowledgement of the warning, which will be placed in the case file in this review.
2. The witness is currently the president and chief executive officer of The Concept Works, a public relations, marketing, political, and crisis management consulting firm. He has worked at this firm for approximately 11 years. He also serves as the executive director of the Society of St. Vincent de Paul, a Catholic charitable organization.
3. In his position with The Concept Works, the witness has consulted with numerous state and congressional political campaigns. He served as the Iowa campaign manager for Mike Huckabee's 2008 presidential campaign, and worked with the Tim Pawlenty presidential campaign in Iowa in 2011 as a communications advisor.
4. In September 2011, after Mr. Pawlenty dropped out of the 2012 presidential primary race, the witness did some free lance communications work for Rep. Michele Bachmann's presidential campaign. In October 2011, he was asked to manage the Bachmann for President ("BFP") Iowa campaign, and he joined that campaign on or about October 27, 2011. He served as the BFP Iowa campaign manager through the Iowa caucus in January 2012.
5. The witness became involved in the 2012 Bachmann campaign after a call from Alice Stewart, the BFP press secretary, at around the time that then-campaign manager Ed Rollins was leaving the Bachmann campaign. The witness knew Ms. Stewart from the 2008 Huckabee presidential campaign. The witness said he had no prior relationship with Rep. Bachmann.
6. The witness stated that he was retained by BFP in early September 2011. He dealt with the new BFP campaign manager Keith Nahigian on his consulting relationship with BFP. He did not

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have a formal agreement with BFP. He was formally promoted to the position of Iowa campaign manager on October 27, 2011.

7. The witness would generally provide his invoices for work performed for BFP to Iowa campaign staff member Wes Enos, who would then forward them to campaign treasurer Nancy Watkins. On occasion, he may have sent his invoices directly to Ms. Watkins. The witness said that he received his first paycheck from BFP in November 2011.
8. The witness said that he reported to BFP national political director Guy Short, and through Mr. Short to campaign manager Keith Nahigian. He also worked with press secretary Alice Stewart on communications matters.
9. The witness said that Mr. Enos served as the deputy Iowa campaign manager. Tony Eastman and Christopher Dorr were field staff who worked out of the Iowa campaign headquarters, and Emma Nemecek and Mark Doland were field staff who worked out of their homes. Barb Heki worked in the Iowa headquarters and was responsible for outreach to the home school community. Peter Waldron and Drew Klein were responsible for faith-based outreach. Alex Latcham also worked on the Iowa campaign staff.
10. The witness said that Mr. Short was in the BFP Iowa campaign headquarters quite often during the witness' time at the campaign, often for a few weeks at a time. The witness said that Mr. Short may have returned to his home in Colorado on occasion. He said that Mr. Short was around most of the time in November and December 2011, leading up to the Iowa caucuses, although he believes Mr. Short returned home for the holidays in December. Mr. Short may also have spent time in New Hampshire during these two months.
11. The witness said he had "sparse" interactions with Rep. Bachmann during the campaign, and that he was not around her enough to know how hands-on she was in managing the campaign. He noted that Rep. Bachmann had high expectations and high standards.
12. The witness said that Mr. Nahigian and advisor Brett O'Donnell interacted with Rep. Bachmann on a regular basis. He did not recall seeing Mr. Short interacting with Rep. Bachmann.
13. The witness had no interactions with Bachmann for Congress or with MICHELE PAC during the presidential campaign. He said that he was not even sure who was involved in running the PAC, and he was not aware of any activities by the PAC during the presidential campaign.
14. The witness said that he first met Mr. Short after he joined the Bachmann campaign in September 2011. He thought that Mr. Short might have had another client, perhaps a congressional candidate in Colorado. He said that when Mr. Short was in Iowa, however, his focus was on BFP.
15. The witness said that Mr. Short was serving as the campaign's national political director when the witness joined the campaign. Mr. Short's duties as national political director included overseeing the structure and strategy of the campaign, overseeing the campaign's caucus turnout efforts, managing relationships with political figures, and overseeing campaign finances.

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16. The witness said the Mr. Short worked "a tremendous number of hours," often starting each day with a 7:00 AM conference call and ending the day at 10:00 PM. He said that Mr. Short was working in Iowa "most of the time" that the witness was involved with the campaign.
17. The witness said that BFP was running short of money in December 2011. He worked very hard to make sure that Iowa campaign staff members were paid early that month. He was not aware of any requests that staff work without compensation or defer compensation in December 2011.
18. The witness said that Mr. Short may have told him at one point in December 2011 that he was not getting paid by BFP "right now." This may have been in response to complaints or concerns about not getting paychecks.
19. The witness stated that he could testify that Mr. Short in his capacity as BFP national political director supervised operations full time in the Iowa BFP office in December 2011 and managed caucus deployment in January 2012.
20. The witness was not aware of any payments to Mr. Short from MICHELE PAC.
21. The witness said he first met Kent Sorenson in summer 2010, after he had been asked to help with Mr. Sorenson's 2010 state senate election. He provided advice to Mr. Sorenson during a meal they had at that time.
22. The witness said he had no further contact with Mr. Sorenson until the witness joined the BFP campaign in September 2011.
23. The witness said that Mr. Sorenson served as BFP's Iowa state campaign chair, but that Mr. Sorenson had a more "hands-on" role in managing the Iowa campaign than a typical "honorary" campaign chair may have.
24. The witness' perception of Mr. Sorenson was that he was "tolerated" by the campaign. The national team saw him as a "big catch" initially, but he was later seen as a liability because of public statements he had made.
25. When asked if Mr. Sorenson was compensated for the services he provided to BFP, the witness said he did not know this for a fact, but that he had an understanding that Mr. Sorenson was being paid. He stated that this understanding probably came from conversations with other Iowa campaign staff members, but he did not know firsthand whether Mr. Sorenson was being paid.
26. The witness said he also got this understanding from conversations with Mr. Sorenson himself in late December 2011. The witness said that Mr. Sorenson gave him the impression that Mr. Sorenson was going to lose income from BFP after the Iowa caucuses, asking, "How am I going to pay my mortgage?"
27. The witness also said that Mr. Sorenson told him that he would be paid \$30,000 up front for endorsing the presidential candidacy of then-Rep. Ron Paul, and then \$8,000 per month from the Paul campaign.
28. The witness said that he had a conversation with Mr. Sorenson around this time, in the witness' office at the Iowa BFP headquarters, about the pros and cons of switching his support from the

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Bachmann campaign to the Paul campaign. The witness said he believes he had a similar conversation with Mr. Enos, who was close to Mr. Sorenson.

29. The witness said he had no idea of the source of Mr. Sorenson's compensation, but assumed he was being paid through an entity different than BFP.
30. The witness said he did not know if Rep. Bachmann was aware of Mr. Sorenson's compensation or compensation arrangements.
31. The witness said that he believes campaign manager Keith Nahigian was in charge of the logistics for the book tour promoting Rep. Bachmann's book *Core of Conviction* after Thanksgiving in 2011. The witness said that Mr. Nahigian asked him to map out stops to hit during the book tour.
32. The witness said that he worked on this request at his consulting firm office, rather than the Iowa campaign headquarters, because of his personal concern about the line between the campaign and the book tour.
33. The witness believes he would have called some bookstores as part of his efforts to map out stops to hit on the book tour.
34. The witness says he was not sure who he should invoice for his work relating to the book tour. He said he did not consider it part of his duties as BFP Iowa campaign manager.
35. The witness said he was not sure who paid for the expenses relating to the book tour.

This memorandum was prepared on April 19, 2013 after the interview was conducted on March 29, 2013. I certify that this memorandum contains all pertinent matter discussed with the witness on March 29, 2013.

Scott Gast
Investigative Counsel

EXHIBIT 23

CONFIDENTIAL

Subject to the Nondisclosure Provisions of H. Res. 895 as Amended

OFFICE OF CONGRESSIONAL ETHICS
UNITED STATES HOUSE OF REPRESENTATIVES

MEMORANDUM OF INTERVIEW

IN RE: Former Iowa Deputy Campaign Manager
Bachmann for President
REVIEW No(s): 13-1274
DATE: March 29, 2013
LOCATION: 401 Locust Street
Des Moines, IA
TIME: 8:00 AM to 8:50 AM (approximate)
PARTICIPANTS: Scott Gast
Kedric Payne

SUMMARY: The OCE requested an interview with the witness and he consented to an interview. The witness made the following statements in response to our questioning:

1. The witness was given an 18 U.S.C. § 1001 warning and consented to an interview. The witness signed a written acknowledgement of the warning, which will be placed in the case file in this review.
2. The witness is currently working as a real estate agent with Iowa Realty. He has been licensed since April 2012. The witness also works as a clerk for an Iowa State Representative.
3. The witness has engaged in political consulting since 2006, including working on the Huckabee for President campaign, an Iowa gubernatorial race, and a congressional race.
4. The witness was employed by the Bachmann for President ("BFP") campaign from June 2011 to December 26 or 27, 2011.
5. The witness stated that he had been looking to join a presidential campaign during the 2012 election cycle. In January 2011, Kent Sorenson, who had been a friend of the witness for a long time, asked the witness to join him in helping Rep. Michele Bachmann.
6. The witness was initially hired by Andy Parrish as an independent contractor to MICHELE PAC, Rep. Bachmann's leadership PAC, in February 2011. He was paid \$4,500 per month. His duties for the PAC included staffing Rep. Bachmann when she traveled to Iowa, finding meetings for Rep. Bachmann or him to attend, and building relationships.
7. The witness was also paid by Bachmann for Congress ("BFC") campaign to perform exploratory work for a potential presidential campaign by Rep. Bachmann. His duties on behalf of BFC included building lists of potential supporters and engaging in other activities that might be beneficial to a future presidential campaign.

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Subject to the Nondisclosure Provisions of H. Res. 895 as Amended

8. The witness said that he was instructed to keep logs of the hours he spent performing work for the PAC and the hours he spent performing work for BFC. He said he submitted invoices to both the PAC and to BFC based on the logs he kept. The invoices were submitted to campaign legal counsel, who would ask him questions about the invoices.
9. The witness said that he was hired by BFP starting in or around June 2011. His initial title was Iowa political director; later in the campaign, he became the assistant Iowa campaign manager. His duties on behalf of BFP included organizing field operations, recruiting volunteers, and staffing Rep. Bachmann at campaign events.
10. The witness said that he would often assist other BFP Iowa campaign staff members with preparing invoices for work performed for the campaign, then collect the invoices and submitted them together. He said that when Ed Rollins and David Polyansky took over the campaign, he submitted the invoices to Elizabeth Pinkerton, who forwarded them to campaign Treasurer Nancy Watkins for processing and payment.
11. The witness said he had very minimal interactions with Rep. Bachmann during the campaign, adding that she was "closely guarded" by her "inner circle." The witness said that initially, this inner circle consisted of Andy Parrish and Rep. Bachmann's spouse, then changed to Ed Rollins, David Polyansky, Brett O'Donnell, and Keith Nahigian. The witness said that Guy Short was part of the inner circle before the others joined the campaign.
12. The witness said that Rep. Bachmann had minimal supervision over the management of the campaign. He said that she only seemed to get involved when something was not right.
13. The witness stated that Guy Short was in charge of MICHELE PAC. The witness said that his first interaction with Guy Short came in June 2011, when, at the end of his first month of work, he spoke with Mr. Short to ask how to invoice MICHELE PAC.
14. The witness was not familiar with C&M Strategies.
15. The witness said he did not see Mr. Short and Rep. Bachmann interact much during the campaign.
16. The witness saw Mr. Short the most around the time of the Iowa straw poll, when he was running phones and data to get people out to the straw poll. He said that toward the end of the campaign, Mr. Short became national field director.
17. The witness assumes that Mr. Short was working full-time for the BFP campaign, and that he would have had to set aside any other clients during the last month of the campaign.
18. The witness said that he never saw Mr. Short working for other clients during the presidential campaign. He recalled that Mr. Short worked from about 9:00 AM to 10:00 PM most days during the campaign.
19. The witness said that neither he nor other Iowa staff members were asked to forego or defer paychecks during the presidential campaign, adding that they were always paid. He said that the New Hampshire campaign staff was asked to do so.

CONFIDENTIAL

Subject to the Nondisclosure Provisions of H. Res. 895 as Amended

20. When asked if Kent Sorenson was compensated for his work on behalf of BFP, the witness said he did not know about any of that.
21. The witness stated that he knew that Iowa state senate ethics rules say that a senator cannot be paid directly by a campaign. He said that he does not know if Mr. Sorenson received any compensation for his work for BFP, but assumes that he might have. The witness said that he would not have let Mr. Sorenson discuss things like this with him, because he did not want to be in a position of having such knowledge.
22. The witness said that Mr. Sorenson was friendly with Mr. Short, and that they knew each other through work relating to right-to-work issues. He did not know if Mr. Sorenson and Mr. Short had any compensation relationship.
23. The witness stated that he does not remember a discussion in which Mr. Sorenson stated that he was not working for BFP "for free."

This memorandum was prepared on April 22, 2013 after the interview was conducted on March 29, 2013. I certify that this memorandum contains all pertinent matter discussed with the witness on March 29, 2013.

Scott Gast
Investigative Counsel

EXHIBIT 24

Subject: MPAC mailing

Date: Saturday, December 3, 2011 1:59:24 PM ET

From: [REDACTED]@aol.com

To: [REDACTED]@nahigianstrategies.com

Keith,

Below is the proposed MPAC letter.

- 1) This letter will go to ONLY donors that have NOT given to the POTUS.
- 2) We can eliminate IA and SC if we want.
- 3) Yes this is VERY long... because long letters work better (money/response) than short letters.
- 4) Please approve strategy/messaging... at that point I'll get Bill to approve legal.

Thanks,
Guy

XXXXDATEXXXXXX

Dear XXXXNAMEXXXX,

Since announcing my candidacy for President of the United States, I have had the privilege of traveling the country and talking to everyday Americans about my plan to return our country to the path our Founding Fathers intended.

Limited government... lower taxation... strong national security... personal responsibility... the right to keep-and-bear arms... property rights of the individual... respect for the sanctity of life... these are just a few of the principles that I have heard loud and clear from American's across the country and fought for since the very first day I arrived in Congress.

I intend to fight for each and every one of these principles and win the Republican nominee for President and ensure that Barack Obama becomes a one-term President.

However, today, I am not writing about my campaign for President.

I have also been an outspoken advocate for the need for a super majority of 60 conservative Republican Senators and expanding our Tea Party majority in the United States Congress.

By taking this majority, God willing... We will be able to unravel the damage created during 4 years of the Obama Presidency - whose agenda has run directly counter to each of the Founding conservative principles I listed above.

With a Tea Party majority, we can add the wind to the sails of a conservative President... and achieve our shared goals, including:

- ++ Repeal the un-Constitutional ObamaCare;
- ++ Stop the out-of-control Federal spending;
- ++ End taxpayer funding of Planned Parenthood;
- ++ Protect our 2nd Amendment rights;

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- ++ Ensure our nation keeps an unapologetically strong national defense;
- ++ Lower taxation and federal regulations to promote small business growth; and
- ++ End the excessive government intrusion that has been promoted since the day Barack Obama took office.

And achieving all of these goals through a 60 vote majority in the Senate and Tea Party majority in Congress is exactly why I am writing you today.

Specifically, I am writing to you today about my leadership PAC, Michele PAC, which is the premier PAC in the country fighting for this very goal to ensure that our next President (which I fully intend to be) has the legislative ability to undo the damage done by 4 years of the Obama/Reid/Pelosi agenda.

Let me be blunt: Recent events have proven that this will not be an easy task. The recent "Occupy" protests show that the Democrats will go to any lengths to win in 2012 and achieve victory.

You see, while the mainstream media has focused their attention and adoration on these "Occupy Wall Street" protestors, the time has come for conservatives to let our voices be heard on these liberal protests.

And that is why the first thing I am asking of you today is to complete the enclosed OCCUPY WALL STREET SURVEY and return it to me immediately.

Your completed survey will be compiled with the responses of other conservatives from across the country and be released to every major news outlet, including FoxNews, CNN, ABC, NBC and CBS.

Your survey will ask you such questions as:

"Do you agree with the Occupy Protestors that everyone should have a free college education?"

And...

"Do you support the "Occupy" movements demand for amnesty for illegal aliens?"

It is questions like these and many others that we need your input on to show that these "Occupy" protestors DO NOT speak for us, nor do they speak for the majority of Americans.

You see, as a front group that advocates for Democrat policies, the "Occupy" movement is just one of the attack dogs that the Democrats and their liberal allies plan to unleash in their effort to take back Congress in 2012 and return Nancy Pelosi as Speaker of the House.

Conservatives must unite to ensure that this NEVER happens.

And that is why it is crucial that we know that you are on our Michele PAC team for 2012.

I have no doubts whatsoever that, with so much at stake, 2012

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promises to hold the most important Congressional elections in the history of our country.

But with Election Day now just under a year away, time is short and we need you on our team today.

Please, let me explain.

While the mainstream media delights in their every move and compares them to the heroes of the civil rights movement... nothing could be further from the truth when it comes to the "Occupy" protests.

In reality, the basis of the "Occupy" protests is nothing more than old-fashioned communist/socialist rhetoric.

They smugly DEMAND:

- ++ A guaranteed income regardless of employment;
- ++ A free college education;
- ++ Eliminating personal responsibility by automatically refinancing "underwater" loans to 1%;
- ++ Amnesty for illegal aliens;
- ++ Taxpayer funding of all political campaigns;
- ++ Government takeover of healthcare - demanding even more government intrusion than ObamaCare; and
- ++ A massive expansion of "public works" projects (aka taxpayer funded "boondoggle")

Of course, these protesters make all of their demands and plan to stick the tab on someone else... you and me!

Even more unbelievably, they stage their hippie-style sit-ins in public parks provided courtesy of your tax dollars - without even a hint of awareness at this irony.

Make no mistake... while the Democrats and the left-wing media try to paint the "Occupy" protests as a grassroots movement of peace loving citizens... the fact of the matter is that this is well-funded and organized front for the Democratic Party.

In fact, just recently, President Obama has made clear his endorsement of the "Occupy" movement and its rhetoric, evidenced by his incessant talking about the 1 percent versus the 99 percent.

He even went so far as to blame hard-working entrepreneurs, whom he calls "lazy," for the economic downturn.

It's all the same, old tired class warfare that the liberals have used for decades.

But, you and I know that economies don't prosper because a group of voluntarily unemployed protestors form a drum circle in a public park.

Jobs aren't created by slogans like, "Occupy Everything ... Never Give It Back."

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Rather, our country prospers when our leaders foster small business growth... growth that is encouraged when our elected leaders stand firm on conservative principles of:

- Limited government;
- Personal Responsibility;
- Low and Equitable Taxation;
- Freedom for all.

Yet, these type of conservative principles run directly contrary to the demands of the "Occupy" protestors.

Bottom line? If we are to have any chance of ensuring a conservative Tea Party majority in Congress, we need to support dyed-in-the-wool conservative candidates that will stand firm on these very principles.

And, that is exactly why we need you on our Michele PAC team for 2012.

As you know, Michele PAC only supports those candidates that make an unwavering commitment -- in words and in action -- to the principles of freedom, including:

- Limited government;
- Fiscal restraint and accountability;
- Low taxation;
- Respect for the sanctity of life; and
- Ardent support for traditional family values.

Michele PAC is committed to bringing conservatives together as one voice to achieve our goals.

In fact, Michele PAC stands for: Many Individual Conservatives Helping Elect Leaders Everywhere.

And I am proud of the role that Michele PAC played in the historic elections of 2010, playing a prominent role in ushering in the next generation of conservative leaders in Congress.

And, most importantly, to help counter the massive Democrat political machine -- including the "Occupy" protests -- Michele PAC has recently unveiled our 2012 Victory agenda which includes:

- ++ Building a massive \$10 million warchest to help true conservative candidates win in 2012;
- ++ Working hard to repeal the un-Constitutional ObamaCare legislation;
- ++ Identifying and supporting the next wave of conservative leaders to run for Congress;
- ++ Organizing a massive grassroots army ready to take action to help our endorsed candidates win their elections; and
- ++ Providing support - both direct and indirect - to support true conservative candidates nationwide.

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With you on our team, we can fully fund our battle plan and ensure that true conservative candidates have the resources they need to fight back in their respective races.

Simply put, we cannot afford to let the Occupy protestors get their way and destroy our country.

Already... the Barack Obama/Harry Reid/Nancy Pelosi big government agenda has been an epic failure in every sense of the word - and the "Occupy" protestors want to extend this agenda even further!

Just take a quick look at the numbers:

- 9.1% Unemployment rate with 32 straight months in excess of 8% unemployment;
- 2.2 million jobs lost since the Democrats took control, with a staggering 1.5 million of those jobs lost since Obama's boondoggle "stimulus" bill passed;
- 7.5 million foreclosures nationally in the Obama economy; and
- A staggering \$4.2 TRILLION added to our national debt, the most rapid increase in the history of our country.

With a record like this, you would think the Democrats and their "Occupy" allies would be making a quick about face and considering that, perhaps, their tax and spend philosophy just isn't working.

However, recent events have made it clear that, instead of considering the facts, the Democrats are digging in their heels and seeking to implement even more of their big government agenda.

That's right... President Obama's "Pass This Bill!" jobs speech made it clear that, despite clear evidence to the contrary, the Democrat plan to pull our country back from the fiscal cliff is just more of the same...

More taxes... More massive government spending... and, more crippling governmental regulations.

In other words: President Obama is seeking to implement the "Occupy" agenda.

As you know, I am running for President to combat this type of offense to our country. I want to help right the path of our country that has clearly gone off the rails under the excesses of the liberal agenda.

However, I am reaching out to you in this urgent correspondence because to truly right the path of our country, we desperately need a conservative majority in the United States Congress...

... A majority that will seek to unravel and repeal the destructive policies that the Democrats managed to pass during the first 2 years of the Obama Presidency.

And to do that, we must tackle the socialist rhetoric of the Occupy movement head-on... without delay.

And that is why I urge to immediately complete the enclosed OCCUPY WALL STREET SURVEY and return it to me today.

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And, because we need every dollar we can muster to help our conservative candidates win on Election Day, I implore you to return your survey along with a generous donation of \$35, \$50, \$75, \$100, \$250, \$500 or more today.

The bottom line is that Conservatives cannot wait another day to start confronting the lies and deceit of the Democrats and socialist rhetoric of their "Occupy" protests.

We must UNITE and put every ounce of energy into saving freedom and saving our country by ensuring victory in 2012.

So, please... join our team today! I greatly look forward to your response.

Thank you and May God Bless America!

Rep. Michele Bachmann

Chairman, Michele PAC

P.S. The "Occupy" protests are nothing more than the same old socialist rhetoric that has been spewed from the left for years. While the media continues its love affair with these protestors, we must speak out NOW and let our voices be heard. We must let them know that we do NOT support their anti-American demands and will do everything in our power to ensure a conservative majority in 2012. So, please, immediately complete the enclosed OCCUPY WALL STREET SURVEY and rush it back to me today along with your most generous contribution of \$35, \$50, \$75, \$100, \$250 or more today.

EMERGENCY REPLY TO CONGRESSWOMAN MICHELE BACHMANN
CHAIRMAN, MICHELE PAC

FROM: XXXXNAMEXXXXX XXXCODEXXXX

XXXXADDXXXXXX

XXXXADDXXXXXX

XXXXCTSYZIPXX

Dear Congresswoman Bachmann,

The Occupy protesters DO NOT speak for me! And, I will not sit on the sidelines in 2012 and allow them and their socialist rhetoric to influence this election. Rather, I will do everything I can to ensure a conservative majority in 2012 to help right the path of our country.

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Therefore, I am using the enclosed pre-addressed envelope to rush back my:

- ☐ Completed and signed OCCUPY WALL STREET SURVEY; and
- ☐ My most generous contribution of:

_____ \$35 _____ \$50 _____ \$75 _____ \$100
_____ \$250 _____ \$500 Other \$ _____ *

*maximum legal contribution is \$5,000 per individual, \$10,000 per couple.

- ☐ YES! I want you to keep me updated on the latest breaking news and activist alerts through email.
My email address is: _____

Please make your check payable to: Michele PAC

ALL STANDARD FED DISCLAIMERS AND ADDRESSES

OCCUPY WALL STREET SURVEY

INSTRUCTIONS: Use blue or black pen. Please choose only one answer for each question.

1. Do you agree with the "Occupy" protestors that everyone should have a free college education? YES NO UNDECIDED
2. Do you support the "Occupy" protestors demand for amnesty for illegal aliens? YES NO UNDECIDED
3. Do you agree with the "Occupy" protestors communist demand for a guaranteed income regardless of employment? YES NO UNDECIDED
4. Do you support the "Occupy" protestors demand to eliminate personal responsibility by automatically refinancing "underwater" loans to 1% interest rate? YES NO UNDECIDED
5. Do you support the "Occupy" protestors demand of taxpayer funding for all political campaigns? YES NO UNDECIDED

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6. Do you support the "Occupy" protestors demand for a complete and total government takeover of healthcare? YES NO UNDECIDED

7. Do you support the "Occupy" protestors demand for a "massive expansion of taxpayer funded "public works" projects? YES NO UNDECIDED

EXHIBIT 25



Re: Haberman blog post

Friday, March 9, 2012 3:29 PM

From: [REDACTED]@aol.com" [REDACTED]@aol.com>

To: [REDACTED]@odacomunications.com, [REDACTED]@att.net, [REDACTED]@pattonboggs.com

Andy cares.

-----Original Message-----

From: brett <[REDACTED]@odacomunications.com>

To: guyshort <[REDACTED]@aol.com>; jlp4 <[REDACTED]@att.net>; wmcginley <[REDACTED]@pattonboggs.com>

Sent: Fri, Mar 9, 2012 2:27 pm

Subject: RE: Haberman blog post

Good thing justa blog post. I think it will be a non story. Who cares about this?

----- Original Message -----

Subject: Haberman blog post

From: [REDACTED]@aol.com

Date: Fri, March 09, 2012 4:22 pm

To: [REDACTED]@att.net, [REDACTED]@pattonboggs.com,
[REDACTED]@odacomunications.com

Fairly uneventful thus far. We will see where it goes and if it gets legs.

By MAGGIE HABERMAN |

3/9/12 2:22 PM EST

After flipping through Michele Bachmann's presidential campaign filings and the FEC reports for Michele PAC from the end of last year, I noticed a \$20,000 payment to the firm of her longtime direct-mail fundraising consultant, Guy Short in December.

But there was no such payment to the firm, or to Short, for the same time period from the campaign -- a period in which he was in Iowa, spotted by several people, working for her presidential effort.

PACs are not allowed to reimburse consultants for campaign work.

I asked Short about the payment, and this was his reply:

"I am an independent contractor and consultant. I have multiple clients and Michele PAC and Mrs. Bachmann's Presidential campaign are only two of them. I don't discuss my clients relationships with the press. The services I perform for each of my clients are separate and distinct -- the services I provide for one client doesn't effect service for another," he said.

"Towards the end of the presidential campaign I volunteered some of my time for the campaign in Iowa -- the campaign picked up my expenses -- while I continued to maintain all of my other client relationships."

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