



50 Kennedy Plaza, Suite 1500
Providence, RI 02903

October 24, 2014

Mr. Richard Thornton
Rhode Island Board of Elections
50 Branch Avenue
Providence, RI 02904

Dear Mr. Thornton:

We file this complaint with the Rhode Island Board of Elections (BOE) alleging specific violations of Rhode Island election laws by a coalition calling itself “Citizens for Responsible Government” (CFRG).

In reports filed with the BOE, CFRG lists its business address as 365 Smith Street, Providence, RI 02908. The contact for CFRG is listed as Ms. Jenny Norris, Campaign Manager, tel. (401) 241-7413, jenny@ricfrg.org. CFRG has purchased extensive services detailed below from Checkmate Consulting of 461 Main St, East Greenwich, RI 02818, tel. (401) 885-0666, Mr. Brad Dufault, principal. For the addresses of CFRG’s donor organizations, see Exhibit A. For CFRG BOE CF-8 Independent Expenditure filings, see Exhibit B.

CFRG is conducting ballot question advocacy in an effort to defeat Ballot Question 3. It reports spending over \$100,000 to persuade Rhode Island voters to reject the call for a constitutional convention. CFRG has published “electioneering communications,” including a paid electronic media internet video communication, two billboards, and three electronic media internet web pages, as defined in RIGL 17-25-3 (14) (Exhibit C). **Considering the proximity to the election, we ask you to consider these issues on an emergency basis at your scheduled meeting on the afternoon of Monday, October 27, 2014 to begin to address these issues so that they can be resolved before the election.**

Mr. Richard Thornton
October 24, 2014

The most important violation is a paid internet video (“rejectquestion3.com”) that is being pushed to Rhode Island viewers on YouTube as a “pre-roll” advertisement appearing before their video loads, and also as a paid advertisement on other internet media outlets. This video may have been viewed tens of thousands of times or more by Rhode Islanders. The video is set as a mock auction of the Rhode Island Constitution and does not include any required disclaimer information or even the name of the sponsoring organization.

We will be alleging specific violations, to be set out below, of the laws requiring that electioneering communications must directly inform voters about basic information concerning who is producing, supporting or backing these electioneering communications. These laws are all contained in RIGL 17-25.3-3 (Exhibit D). First, though, we will make an initial comment about the fact that CFRG and/or its members are subject to these laws.

Regarding independent expenditures for ballot advocacy, it is only legal for “*any person, business entity or political action committee...to expend personally from that person’s own funds a sum which is not to be repaid to him or her for any purpose not prohibited by law to support or defeat a candidate or referendum*” (RIGL 17-25.3-1, Exhibit E) if there is compliance with the disclaimers as required under applicable election laws. Among these laws are the requirements in RIGL 17-25.3-3 (Exhibit D) that any “person” must include, in its electioneering communications, “disclaimer” information such as its name, its address, and an identification of its chief executive officer or equivalent. The definition of “person” under Title 17-25-3 (9) includes a “partnership, committee, association, ... and/or any other organization”, with the exception of 501(c)(3) nonprofits and “exempt nonprofits”. CFRG, whose effort is directed entirely towards opposing ballot question 3, cannot justifiably claim to be a 501(c)(3) nonprofit or an “exempt nonprofit”, since 501(c)(3) and “exempt nonprofits” are bound by strict limits on their electioneering activity which CFRG has exceeded. We conclude, then, that CFRG, as a “partnership, committee, association...and/or any other organization”, is a “person”, and therefore is subject to the law requiring it to ensure that voters exposed to its electioneering communications can see its name, address, and chief executive.

To our knowledge, CFRG is not registered with the Secretary of State of Rhode Island as a domestic or foreign corporation, and CFRG has not filed notification of formation of a Political Action Committee with the Board of Elections. But if it is argued that the law does not apply to CFRG since CFRG lacks legal status, then the law would apply instead to CFRG’s donor organizations, which would then have to include disclaimers of their own in CFRG’s electioneering communications. CFRG has not done so.

Mr. Richard Thornton
October 24, 2014

The relevant law is specific. Disclosure requirements for electioneering communications by “persons” or “business entities” according to Title 17-25.3-3 (Exhibit D) are that they must bear upon their face (1) “Paid for by” followed by (2) the name of the organization, (3) the name of the CEO or equivalent, and (4) the business address. In addition, the law contains an important requirement that nonprofits must include in their electioneering communications the names of their “Top Five Donors” (RIGL 17-25.3-3, Exhibit D); this requirement applies to Section 527 nonprofits and to 501(c) nonprofits apart from 501(c)(3) groups and “exempt nonprofits”. Again, CFRG cannot justifiably claim to be a 501(c)(3) or an “exempt nonprofit”, so as a nonprofit it is subject to this legal requirement.

Most of CFRG’s donors are the types of organizations that would automatically be subject to the “Top Five Donors” requirement under the law: include 501(c)(6) nonprofits and 501(c)(5) unions, for instance, as well as 501(c)(4) groups. CFRG’s donors may claim that, since CFRG lacks legal status, it is not a nonprofit and can avoid this requirement. However, CFRG’s donors cannot evade their obligations under applicable laws by setting up an entity that lacks legal status. Since CFRG lacks legal status, those obligations fall on each of CFRG’s donors directly. Clearly, disclaimers must be displayed on their advertisements either by CFRG or all of its individual members.

We believe and allege that CFRG coalition donors (Exhibit A), who would be required to disclose their Top 5 Donors on their electioneering communications, but who are working through CFRG and are not doing so, are in violation of Title 17-25.3-3. At the very least, we believe that every electioneering communication originating with “CFRG” is required display on its face all of the required disclosures including (1) the “Top 5 Donors” in the preceding twelve months, (2) “Paid for by” followed by the organization name, (4) the name of the CEO or equivalent, (5) and the business address.

The specific violations of Rhode Island election law by CFRG and the twenty-two donor organizations in “CFRG” in this complaint are:

1. A 90 second paid internet video YouTube “pre-roll” advertisement (Exhibit F and Exhibit G (USB drive)), posted at rejectquestion3.com and published to YouTube on September 28, 2014, currently running as a “pre-toll paid advertisement prior to the YouTube user’s video, and also as a paid advertisement on other internet media outlets, is in violation of RIGL 17-25.3-3 (a) and/or RIGL 17-25.3-3 (c) (Exhibit D). The specific violation is that the internet video does not name the “Top 5 Donors”, as required by law.

Mr. Richard Thornton
October 24, 2014

2. A 90 second paid internet video YouTube “pre-roll” advertisement (Exhibit F and Exhibit G (USB drive)), posted at rejectquestion3.com and published to YouTube on September 28, 2014, currently running as a “pre-toll paid advertisement prior to the YouTube user’s video, and also as a paid advertisement on other internet media outlets, is in violation of RIGL 17-25.3-3 (a) and/or RIGL 17-25.3-3 (c) (Exhibit C). The specific violation is that the internet video does not have a “Paid for by” followed by the sponsoring organization(s), as required by law.
3. A 90 second paid internet video YouTube “pre-roll” advertisement (Exhibit F and Exhibit G (USB drive)), posted at rejectquestion3.com and published to YouTube on September 28, 2014, currently running as a “pre-toll paid advertisement prior to the YouTube user’s video, and also as a paid advertisement on other internet media outlets, is in violation of RIGL 17-25.3-3 (a) and/or RIGL 17-25.3-3 (c) (Exhibit C). The specific violation is that the video does not list the address, as required by law.
4. A 90 second paid internet video YouTube “pre-roll” advertisement (Exhibit F and Exhibit G (USB drive)), posted at rejectquestion3.com and published to YouTube on September 28, 2014, currently running as a “pre-toll paid advertisement prior to the YouTube user’s video, and also as a paid advertisement on other internet media outlets, is in violation of RIGL 17-25.3-3 (a) and/or RIGL 17-25.3-3 (c) (Exhibit C). The specific violation is that the internet video doesn’t name the CEO or equivalent.
5. A 90 second paid internet video YouTube “pre-roll” advertisement (Exhibit F and Exhibit G (USB drive)), posted at rejectquestion3.com and published to YouTube on September 28, 2014, currently running as a “pre-toll paid advertisement prior to the YouTube user’s video, and also as a paid advertisement on other internet media outlets, is in violation of RIGL 17-25.3-3 (a) and/or RIGL 17-25.3-3 (c) (Exhibit C). The specific violation is that the video does not include an image and voice of the CEO saying that they approve the message.
6. “A billboard (“Cadillac billboard”) (Exhibit H) posted as of October 6th, 2014 does not include disclaimers required by RIGL 17-25.3-3 (a) (Exhibit C). The billboard is larger than 32 square feet, located on land adjacent to Route 95 in Providence between exits 17 and 18 west of Route 95’s southbound lane, on Cadillac Street. The specific violation is that the billboard does not include the “Top Five” donors. The law requires the information to be clearly visible in the billboard itself.
7. A billboard (“Cadillac billboard”) (Exhibit H) posted as of October 6th, 2014 does not include disclaimers required by RIGL 17-25.3-3 (a) (Exhibit C). The billboard is larger than 32 square feet, located on land adjacent to Route 95 in Providence

Mr. Richard Thornton
October 24, 2014

between exits 17 and 18 west of Route 95's southbound lane, on Cadillac Street. The specific violation is that the billboard does not include the business address.

8. A billboard ("Cadillac billboard") (Exhibit H) posted as of October 6th, 2014 does not include disclaimers required by RIGL 17-25.3-3 (a) (Exhibit C). The billboard is larger than 32 square feet, located on land adjacent to Route 95 in Providence between exits 17 and 18 west of Route 95's southbound lane, on Cadillac Street. The specific violation is that the billboard does not include the name of the CEO or equivalent.
9. A billboard ("State House billboard") (Exhibit I) posted as of October 6th, 2014 does not include disclaimers required by RIGL 17-25.3-3 (a). The billboard is larger than 32 square feet, and is located between exits 22 and 23 on the southbound side of Route 95 (Exhibit H). The specific violation is that the billboard does not include the "Top Five" donor. The law requires the information to be clearly visible on the billboard itself.
10. A billboard ("State House billboard") (Exhibit I) posted as of October 6th, 2014 does not include disclaimers required by RIGL 17-25.3-3 (a) (Exhibit C). The billboard is larger than 32 square feet, and is located between exits 22 and 23 on the southbound side of Route 95, across Route 95 from the Rhode Island State House. The specific violation is that the billboard does not include the business address, as required by law.
11. A billboard ("State House billboard") (Exhibit I) posted as of October 6th, 2014 does not include disclaimers required by RIGL 17-25.3-3 (a) (Exhibit C). The billboard is larger than 32 square feet, and is located between exits 22 and 23 on the southbound side of Route 95. The specific violation is that the billboard does not include the name of the CEO or equivalent, as required by law.
12. An internet web page (Exhibit J, USB drive), including all of its seven subpages, posted at <http://rejectquestion3.com> that is an electronic media communication as defined in RIGL 17-25-3 (14) that does not on its face have the words "Paid for by" followed by the sponsoring organization(s), as required in RIGL 17-25.3-3 (a) (Exhibit C).
13. An internet web page (Exhibit J, USB drive), and six of its seven subpages, posted at <http://rejectquestion3.com> that is an electronic media communication as defined in RIGL 17-25-3 (14) that does not on its face have the name of the Chief Executive Officer or equivalent, as required in RIGL 17-25.3-3 (a) (Exhibit C).

Mr. Richard Thornton
October 24, 2014

14. An internet web page (Exhibit J, USB drive), and all of its seven subpages, posted at <http://rejectquestion3.com> that is an electronic media communication as defined in RIGL 17-25-3 (14) that does not on its face have the principal business address as required in RIGL 17-25.3-3 (a) (Exhibit C).
15. An internet web page (Exhibit J, USB drive), and all of its subpages, posted at <http://rejectquestion3.com> that is an electronic media communication as defined in RIGL 17-25-3 (14) that does not on its face have the words “Top Five Donors” followed by a list of the five persons or entities making the largest aggregate donations during the preceding 12 months, as required in RIGL 17-25.3-3 (a) (Exhibit C).
16. An internet web page (Exhibit K, USB drive), including all of its six subpages, posted at <http://ricfrg.org/news/> that is an electronic media communication as defined in RIGL 17-25-3 (14) that does not on its face have the words “Paid for by” followed by the sponsoring organization(s), as required in RIGL 17-25.3-3 (a) (Exhibit C).
17. An internet web page (Exhibit K, USB drive), and five of its six subpages, posted at <http://ricfrg.org/news/> that is an electronic media communication as defined in RIGL 17-25-3 (14) that does not on its face have the name of the Chief Executive Officer or equivalent, as required in RIGL 17-25.3-3 (a) (Exhibit C).
18. An internet web page (Exhibit K, USB drive), and five of its six subpages, posted at <http://ricfrg.org/news/> that is an electronic media communication as defined in RIGL 17-25-3 (14) that does not on its face have the principal business address, as required in RIGL 17-25.3-3 (a) (Exhibit C).
19. An internet web page (Exhibit K, USB drive), and all of its six subpages, posted at <http://ricfrg.org/news/> that is an electronic media communication as defined in RIGL 17-25-3 (14) that does not on its face have the words “Top Five Donors” followed by a list of the five persons or entities making the largest aggregate donations during the preceding 12 months, as required in RIGL 17-25.3-3 (a) (Exhibit C).
20. A Facebook internet web page (Exhibit L) that does not display the CEO name.
(<https://www.facebook.com/events/274932909384060/>)
21. A Facebook internet web page (Exhibit L) that does not display the business address.
(<https://www.facebook.com/events/274932909384060/>)
22. A Facebook internet web page (Exhibit L) that does not display the “Top 5 Donors”.

Mr. Richard Thornton
October 24, 2014

(<https://www.facebook.com/events/274932909384060/>)

Although some of these violations may be considered more important than others, we list them all because they show a significant pattern. The law was designed to require that electioneering communications inform the voters about those behind the advertisements. CFRG has thoroughly flouted the requirement to inform voters. When the law requires certain facts to be included in electioneering communications, CFRG does not simply leave out one or two of these facts, but sometimes omits every single one, for example in the YouTube “pre-roll” paid internet video advertisement. We would not have filed this complaint if there were a few minor violations, but it is clear that the violations enumerated in this complaint include some quite serious ones that conceal, or give a wrong impression about, who is spending all of the money to defeat ballot question 3.

These specific violations are urgent as they relate to a ballot question to be approved or rejected by Rhode Island voters on November 4, 2014. We request your immediate action. Therefore, we request, pursuant to RIGL Law 17-25.2-9 (Exhibit M), that the Board of Elections request the Attorney General to bring action immediately in the name of the state of Rhode Island in Superior Court against Citizens for Responsible Government, Citizens for Responsible Government coalition donor members, and Checkmate Consulting, seeking to enjoin CFRG, coalition members, and Checkmate Consulting from continuing the violations. **Specifically, we are seeking an injunction to order CFRG to cease and desist displaying the internet video (“rejectquestion3.com”) that does not provide the viewer with any of the required disclaimer information immediately. We ask that the Board of Elections instruct CFRG that any other advertisements of which we are not aware, or any other advertisements that they may develop and publish, comply with existing laws.** We also ask that civil penalties be applied to CFRG, to Checkmate Consulting, and to each of the coalition donor members under of CFRG under RIGL Title 17-25.2-9 (Exhibit M) and Title 17-25.3-4 (Exhibit N).

(next page)

Mr. Richard Thornton
October 24, 2014

Respectfully,

H. Philip West Jr., Co-chairperson

Margaret Kane, Co-chairperson

Larry Fitzmorris, member

Timothy Murphy, M.D., member

Mr. Richard Thornton
October 26, 2014

Exhibit A

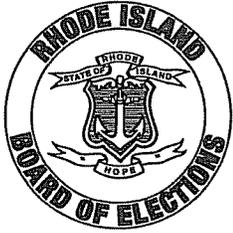
Citizens for Responsible Government coalition members and addresses

1. District 1199 SEIU, 294 W. Exchange Street, Providence, RI
2. SEIU Local 32BJ, 26 West Street, 3rd Floor, Boston, MA 02111
3. SEIU RI State Council, 280 Broadway, Suite 201, Providence, RI 02903
4. United Food and Commercial Workers defense fund, 278 Silver Spring St., Providence, RI
5. Planned Parenthood S. New England, 345 Whitney Place, New Haven, CT
6. RIACLU, 128 Dorrance St., Providence, RI 02903
7. RIFTHP Solidarity Fund, 356 Smith Street, Providence, RI 02908
8. United Nurses and Allied Professionals, 375 Branch Street, Providence, RI
9. AFSCME AFL-CIO PAC 1179, Charles Place, N. Providence, RI
10. New England Laborers Management Trust, 226 South Main Street, Providence
11. RI Brotherhood of Correctional Officers, P.O. Box 8273, Cranston, RI 02920
12. RI Brotherhood of Police Officers, 1344 Cranston Street, Cranston, RI 02920
13. Cranston Teacher's Alliance, 855 Reservoir Avenue, Cranston, RI 02910
14. West Warwick Teachers' Alliance, 2 Webster Knight Dr, West Warwick, RI 02893
15. Iron Workers Local 37 Target Fund, 845 Waterman Ave, East Providence, RI 02914
16. RI AFL-CIO, 194 Smith St, Providence, RI 02908
17. RI AFL-CIO COPE (unknown)
18. Rhode Island Association for Justice, 400 Reservoir Avenue, #3A, Providence, RI 02907
19. RI Hospital UNAP (unknown)
20. UNAP, 375 Branch Avenue, Providence, RI 02904
21. NEA Rhode Island PAC for Education, 99 Bald Hill Road, Cranston, RI 02920
22. Teamsters Local 251, 1201 Elmwood Ave, Providence, RI 02907

Mr. Richard Thornton
October 26, 2014

Appendix B

(see following pages 11-23 for CFRG BOE CF-8 Independent Expenditure filings)



State of Rhode Island and Providence Plantations

Board of Elections
Campaign Finance Division
50 Branch Avenue, Providence, Rhode Island 02904
Tel. (401) 222-2345
www.elections.ri.gov

RECEIVED
10-15-14

6:03 pm

REPORT OF INDEPENDENT EXPENDITURES,
ELECTIONEERING COMMUNICATIONS OR COVERED
TRANSFERS (CF-8)

Time Stamp
(Office Use Only)

Identify Person, Business Entity or PAC responsible for Independent Expenditure, Electioneering Communication or Covered Transfer

Citizen for Responsible Government

Table with 3 columns: Street Address, City/Town, State and Zip Code, Telephone Number. Row 1: 356 Smith Street, Providence, RI 02908, [blank].

The Person, Business Entity or PAC has expended more than \$1000 to support or defeat a Candidate or Referendum as follows:

Identify the Candidate(s) on the ballot and whether funds were expended to support or defeat this candidate

[blank] : Support Defeat

Identify the Referendum on the ballot and whether funds were expended to support or defeat this referendum

Question 3 : Support Defeat

Any person, business entity or political action committee making independent expenditures, electioneering communications, or covered transfers shall report all such expenditures provided the total of the money so expended exceeds \$1000 within a calendar year to the Board of Elections within 7 days of making the expenditure.

Table with 3 columns: Date of Expenditure, Amount of Expenditure, EXPENDITURES Name and Full Address: Person, Business Entity, PAC Receiving Expenditure. Rows 1-5: [blank], \$, [blank].

Year to Date Total of All Expenditures in Support or Defeat of This Candidate or Referendum: \$

Reports of independent expenditures, electioneering communications or covered transfers by a person, business entity or PAC shall disclose the identity of all donors of an aggregate of \$1000 or more within the current election cycle.

Table with 3 columns: Date Donation Received, Donation Amount, DONATIONS Name, Address and Place of Employment of Donor. Rows 1-5: 10/15/2014 \$10,000 New England Laborers Management Trust; 10/15/2014 \$2500 RI Brotherhood of Correctional Officers; 10/15/2014 \$2500 RI Brotherhood of Police Officers; \$; \$.

Amount from Person's, Business Entity's or PAC's own funds for independent expenditures, electioneering communications or covered transfers in Support or Defeat of this Candidate or Referendum: \$

The person named below affirms, under penalty of false statement, that no expenditure contained herein is coordinated with the candidate or referendum whose support or defeat is promoted and that information provided is true and accurate and complies with RI General Laws and with Rules and Regulations adopted pursuant to RIGL §17-25.3 et seq.

Identification of Person Responsible for Making Expenditure	Subscribed and Sworn to me this _____ Date _____ X _____ Notary Public
Signature of Person Responsible for Making Expenditure	
Address, City/Town, State, Zip Code of Person Making Expenditure	

Reporting Requirements for Independent Expenditures, Electioneering Communications and Covered Transfers

WHO NEEDS TO FILE:

It is lawful for any person, business entity or political action committee (PAC), not otherwise prohibited by law and not acting in coordination with a candidate, authorized candidate committee, PAC or political party committee, to expend personally from that person's own funds a sum which is not to be repaid for any purpose not prohibited by law to support or defeat a candidate or referendum.

WHEN TO FILE:

Any person, business entity or PAC making independent expenditures, electioneering communications or covered transfers shall report all such expenditures, provided the total of the money so expended exceeds \$1000 within a calendar year, to the Board of Elections within seven (7) days of making the expenditure.

After a person, business entity or PAC files its initial report, the person, business entity or PAC shall file an additional report after each time the person, business entity or PAC makes or contracts to make independent expenditures, electioneering communications or covered transfers aggregating an additional \$1,000 with respect to the same election as that which the initial report relates.

When a report is required within thirty (30) days prior to the election to which the expenditure was directed, it shall be filed within twenty-four (24) hours of the expenditure. When such a report is required at any other time, it shall be filed within seven (7) days after the expenditure.

WHAT TO FILE:

Reports of independent expenditures, electioneering communications or covered transfers by a person shall contain the name, street address, city, state, zip code, occupation, employer, of the person responsible for the expenditure, the name street address, city, state, zip code of the person receiving the expenditure, the date and amount of each expenditure and the year-to-date total. The report shall also include a statement identifying the candidate or referendum that the independent expenditure or electioneering communication is intended to promote the success or defeat, and affirm under penalty of false statement that the expenditure is not coordinated with the candidate or referendum in question.

Reports shall also disclose the identify, which includes the name, address and place of employment and donation amount, of all donors of an aggregate of \$1000 or more to such person, business entity or PAC within the current election cycle.

PENALTIES:

Any person, who willfully and knowingly violates the provisions of Chapter 25.3 of Title 17 shall, upon conviction, be guilty of a misdemeanor and shall be fined not more than \$1000 per violation. The state Board of Elections may impose a civil penalty upon any person, business or PAC who violates the provisions of Chapter 25.3 of Title 17 in the amount of \$1000, or up to 150% of the aggregate amount of the independent expenditures, electioneering communications or covered transfers per violation, whichever is greater.

THIS FORM MUST BE RETURNED TO THE BOARD OF ELECTIONS BEARING ORIGINAL SIGNATURES.

If you have any questions on how to complete this form, please contact the Board of Elections.



State of Rhode Island and Providence Plantations

Board of Elections
 Campaign Finance Division
 50 Branch Avenue, Providence, Rhode Island 02904
 Tel. (401) 222-2345
 www.elections.ri.gov

RECEIVED
 10-6-14
 1:56pm

**REPORT OF INDEPENDENT EXPENDITURES,
 ELECTIONEERING COMMUNICATIONS OR COVERED
 TRANSFERS (CF-8)**

Time Stamp
 (Office Use Only)

Identify Person, Business Entity or PAC responsible for Independent Expenditure, Electioneering Communication or Covered Transfer

Citizens for Responsible Government

Street Address 356 Smith Street	City/Town, State and Zip Code Providence, RI 02908	Telephone Number
Employer (if applicable)	Occupation (if applicable)	

The Person, Business Entity or PAC has expended more than \$1000 to support or defeat a Candidate or Referendum as follows:

Identify the Candidate(s) on the ballot and whether funds were expended to support or defeat this candidate

Question 3 : Support Defeat

Identify the Referendum on the ballot and whether funds were expended to support or defeat this referendum

: Support Defeat

Any person, business entity or political action committee making independent expenditures, electioneering communications, or covered transfers shall report all such expenditures provided the total of the money so expended exceeds \$1000 within a calendar year to the Board of Elections within 7 days of making the expenditure.

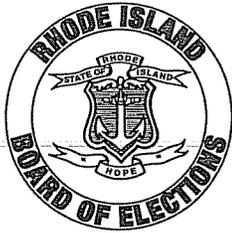
Date of Expenditure	Amount of Expenditure	EXPENDITURES
		Name and Full Address: Person, Business Entity, PAC Receiving Expenditure
9/29/14	\$ 4,464	Jennifer Norris 24B Wymen Street West Warwick, RI 02983
9/29/14	\$ 792	Kyla Pecchia 154 Harrison Ave Warwick, RI 02888
10/6/14	\$ 360	Kyla Pecchia 154 Harrison Ave Warwick, RI 02888
10/7/2014	\$ 13,400.75	Checkmate Consulting 22 London Street East Greenwich, RI
	\$	

Year to Date Total of All Expenditures in Support or Defeat of This Candidate or Referendum: \$

Reports of independent expenditures, electioneering communications or covered transfers by a person, business entity or PAC shall disclose the identity of all donors of an aggregate of \$1000 or more within the current election cycle.

Date Donation Received	Donation Amount	DONATIONS
		Name, Address and Place of Employment of Donor
10/1/14	\$1000	Cranston Teachers' Alliance
10/1/14	\$1000	West Warwick Teachers' Alliance
10/1/14	\$2000	Iron Workers Local 37 Target Fund
10/2/14	\$10000	RI AFL-CIO
10/2/14	\$ 5000	RI AFL-CIO COPE

Amount from Person's, Business Entity's or PAC's own funds for independent expenditures, electioneering communications or covered transfers in Support or Defeat of this Candidate or Referendum: \$



State of Rhode Island and Providence Plantations

Board of Elections
 Campaign Finance Division
 50 Branch Avenue, Providence, Rhode Island 02904
 Tel. (401) 222-2345
 www.elections.ri.gov

**REPORT OF INDEPENDENT EXPENDITURES,
 ELECTIONEERING COMMUNICATIONS OR COVERED
 TRANSFERS (CF-8)**

Time Stamp
 (Office Use Only)

Identify Person, Business Entity or PAC responsible for Independent Expenditure, Electioneering Communication or Covered Transfer

Citizens for Responsible Government

Street Address 356 Smith Street	City/Town, State and Zip Code Providence, RI 02908	Telephone Number
Employer (if applicable)	Occupation (if applicable)	

The Person, Business Entity or PAC has expended more than \$1000 to support or defeat a Candidate or Referendum as follows:

Identify the Candidate(s) on the ballot and whether funds were expended to support or defeat this candidate

Question 3 : Support Defeat

Identify the Referendum on the ballot and whether funds were expended to support or defeat this referendum

: Support Defeat

Any person, business entity or political-action committee making independent expenditures, electioneering communications, or covered transfers shall report all such expenditures provided the total of the money so expended exceeds \$1000 within a calendar year to the Board of Elections within 7 days of making the expenditure.

Date of Expenditure	Amount of Expenditure	EXPENDITURES
		Name and Full Address: Person, Business Entity, PAC Receiving Expenditure
	\$	
	\$	
	\$	
	\$	
	\$	

Year to Date Total of All Expenditures in Support or Defeat of This Candidate or Referendum: \$

Reports of independent expenditures, electioneering communications or covered transfers by a person, business entity or PAC shall disclose the identity of all donors of an aggregate of \$1000 or more within the current election cycle.

Date Donation Received	Donation Amount	DONATIONS
		Name, Address and Place of Employment of Donor
10/6/2014	\$5,000	Teamsters Local 251
	\$	
	\$	
	\$	
	\$	

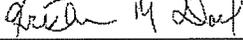
Amount from Person's, Business Entity's or PAC's own funds for independent expenditures, electioneering communications or covered transfers in Support or Defeat of this Candidate or Referendum: \$

The person named below affirms, under penalty of false statement, that no expenditure contained herein is coordinated with the candidate or referendum whose support or defeat is promoted and that information provided is true and accurate and complies with RI General Laws and with Rules and Regulations adopted pursuant to RIGL §17-25.3 et seq.

Identification of Person Responsible for Making Expenditure

Kristen Dart

Signature of Person Responsible for Making Expenditure



Address, City/Town, State, Zip Code of Person Making Expenditure

111 Point St. Providence, RI 02903

Subscribed and Sworn to me this _____ Date

X _____
Notary Public

Reporting Requirements for Independent Expenditures, Electioneering Communications and Covered Transfers

WHO NEEDS TO FILE:

It is lawful for any person, business entity or political action committee (PAC), not otherwise prohibited by law and not acting in coordination with a candidate, authorized candidate committee, PAC or political party committee, to expend personally from that person's own funds a sum which is not to be repaid for any purpose not prohibited by law to support or defeat a candidate or referendum.

WHEN TO FILE:

Any person, business entity or PAC making independent expenditures, electioneering communications or covered transfers shall report all such expenditures, provided the total of the money so expended exceeds \$1000 within a calendar year, to the Board of Elections within seven (7) days of making the expenditure.

After a person, business entity or PAC files its initial report, the person, business entity or PAC shall file an additional report after each time the person, business entity or PAC makes or contracts to make independent expenditures, electioneering communications or covered transfers aggregating an additional \$1,000 with respect to the same election as that which the initial report relates.

When a report is required within thirty (30) days prior to the election to which the expenditure was directed, it shall be filed within twenty-four (24) hours of the expenditure. When such a report is required at any other time, it shall be filed within seven (7) days after the expenditure.

WHAT TO FILE:

Reports of independent expenditures, electioneering communications or covered transfers by a person shall contain the name, street address, city, state, zip code, occupation, employer, of the person responsible for the expenditure, the name street address, city, state, zip code of the person receiving the expenditure, the date and amount of each expenditure and the year-to-date total. The report shall also include a statement identifying the candidate or referendum that the independent expenditure or electioneering communication is intended to promote the success or defeat, and affirm under penalty of false statement that the expenditure is not coordinated with the candidate or referendum in question.

Reports shall also disclose the identify, which includes the name, address and place of employment and donation amount, of all donors of an aggregate of \$1000 or more to such person, business entity or PAC within the current election cycle.

PENALTIES:

Any person, who willfully and knowingly violates the provisions of Chapter 25.3 of Title 17 shall, upon conviction, be guilty of a misdemeanor and shall be fined not more than \$1000 per violation. The state Board of Elections may impose a civil penalty upon any person, business or PAC who violates the provisions of Chapter 25.3 of Title 17 in the amount of \$1000, or up to 150% of the aggregate amount of the independent expenditures, electioneering communications or covered transfers per violation, whichever is greater.

THIS FORM MUST BE RETURNED TO THE BOARD OF ELECTIONS BEARING ORIGINAL SIGNATURES.

If you have any questions on how to complete this form, please contact the Board of Elections.



State of Rhode Island and Providence Plantations

Board of Elections

Campaign Finance Division
 50 Branch Avenue, Providence, Rhode Island 02904
 Tel. (401) 222-2345
 www.elections.ri.gov

RHODE ISLAND
 BOARD OF ELECTIONS

2014 JUL 10 A 10:27

**REPORT OF INDEPENDENT EXPENDITURES,
 ELECTIONEERING COMMUNICATIONS OR COVERED
 TRANSFERS (CF-8)**

Time Stamp
 (Office Use Only)

Identify Person, Business Entity or PAC responsible for Independent Expenditure, Electioneering Communication or Covered Transfer
Citizens for Responsible Government

Street Address 365 Smith Street	City/Town, State and Zip Code Providence, RI 02908	Telephone Number
Employer (if applicable)	Occupation (if applicable)	

The Person, Business Entity or PAC has expended more than \$1000 to support or defeat a Candidate or Referendum as follows:

Identify the Candidate(s) on the ballot and whether funds were expended to support or defeat this candidate

_____ : Support Defeat

Identify the Referendum on the ballot and whether funds were expended to support or defeat this referendum

Constitutional Convention : Support Defeat

Any person, business entity or political action committee making independent expenditures, electioneering communications, or covered transfers shall report all such expenditures provided the total of the money so expended exceeds \$1000 within a calendar year to the Board of Elections within 7 days of making the expenditure.

Date of Expenditure	Amount of Expenditure	EXPENDITURES
		Name and Full Address: Person, Business Entity, PAC Receiving Expenditure
5/07/2014	\$ 2,072.22	Checkmate 461 Main Street East Greenwich, RI
	\$	
	\$	
	\$	
	\$	

Year to Date Total of All Expenditures in Support or Defeat of This Candidate or Referendum: \$

Reports of independent expenditures, electioneering communications or covered transfers by a person, business entity or PAC shall disclose the identity of all donors of an aggregate of \$1000 or more within the current election cycle.

Date Donation Received	Donation Amount	DONATIONS
		Name, Address and Place of Employment of Donor
4/03/2014	\$ 10,000	Planned Parenthood S. New England, Inc 345 Whitney Place New Haven, CT
5/01/2014	\$ 10,000	RI ACLU 128 Dorrance St Providence, RI 02903
5/01/2014	\$ 10,000	RIFTHP Solidarity Fund 356 Smith Street Providence, RI 02908
5/07/2014	\$ 10,000	United Nurses and Allied Professionals 375 Branch Street Providence, RI
5/16/2014	\$ 10,000	AFSCME ALF-CIO People PAC 1179 Charles Place N. Providence RI

Amount from Person's, Business Entity's or PAC's own funds for independent expenditures, electioneering communications or covered transfers in Support or Defeat of this Candidate or Referendum: \$

The person named below affirms, under penalty of false statement; that no expenditure contained herein is coordinated with the candidate or referendum whose support or defeat is promoted and that information provided is true and accurate and complies with RI General Laws and with Rules and Regulations adopted pursuant to RIGL §17-25.3 et seq.

Identification of Person Responsible for Making Expenditure

Kristen Dart

Signature of Person Responsible for Making Expenditure

Kristen M Dart

Address, City/Town, State, Zip Code of Person Making Expenditure

67 Hamlin St Providence, RI 02907

Subscribed and Sworn to me this July 9, 2014
Date

x *DeAnn Byrne*
Notary Public

Reporting Requirements for Independent Expenditures, Electioneering Communications and Covered Transfers

WHO NEEDS TO FILE:

It is lawful for any person, business entity or political action committee (PAC), not otherwise prohibited by law and not acting in coordination with a candidate, authorized candidate committee, PAC or political party committee, to expend personally from that person's own funds a sum which is not to be repaid for any purpose not prohibited by law to support or defeat a candidate or referendum.

WHEN TO FILE:

Any person, business entity or PAC making independent expenditures, electioneering communications or covered transfers shall report all such expenditures, provided the total of the money so expended exceeds \$1000 within a calendar year, to the Board of Elections within seven (7) days of making the expenditure.

After a person, business entity or PAC files its initial report, the person, business entity or PAC shall file an additional report after each time the person, business entity or PAC makes or contracts to make independent expenditures, electioneering communications or covered transfers aggregating an additional \$1,000 with respect to the same election as that which the initial report relates.

When a report is required within thirty (30) days prior to the election to which the expenditure was directed, it shall be filed within twenty-four (24) hours of the expenditure. When such a report is required at any other time, it shall be filed within seven (7) days after the expenditure.

WHAT TO FILE:

Reports of independent expenditures, electioneering communications or covered transfers by a person shall contain the name, street address, city, state, zip code, occupation, employer, of the person responsible for the expenditure, the name street address, city, state, zip code of the person receiving the expenditure, the date and amount of each expenditure and the year-to-date total. The report shall also include a statement identifying the candidate or referendum that the independent expenditure or electioneering communication is intended to promote the success or defeat, and affirm under penalty of false statement that the expenditure is not coordinated with the candidate or referendum in question.

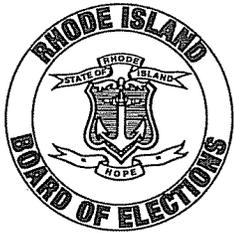
Reports shall also disclose the identify, which includes the name, address and place of employment and donation amount, of all donors of an aggregate of \$1000 or more to such person, business entity or PAC within the current election cycle.

PENALTIES:

Any person, who willfully and knowingly violates the provisions of Chapter 25.3 of Title 17 shall, upon conviction, be guilty of a misdemeanor and shall be fined not more than \$1000 per violation. The state Board of Elections may impose a civil penalty upon any person, business or PAC who violates the provisions of Chapter 25.3 of Title 17 in the amount of \$1000, or up to 150% of the aggregate amount of the independent expenditures, electioneering communications or covered transfers per violation, whichever is greater.

THIS FORM MUST BE RETURNED TO THE BOARD OF ELECTIONS BEARING ORIGINAL SIGNATURES.

If you have any questions on how to complete this form, please contact the Board of Elections.



State of Rhode Island and Providence Plantations

Board of Elections

Campaign Finance Division
50 Branch Avenue, Providence, Rhode Island 02904
Tel. (401) 222-2345
www.elections.ri.gov

RECEIVED
10-20-14
7:09pm

REPORT OF INDEPENDENT EXPENDITURES,
ELECTIONEERING COMMUNICATIONS OR COVERED
TRANSFERS (CF-8)

Time Stamp
(Office Use Only)

Identify Person, Business Entity or PAC responsible for Independent Expenditure, Electioneering Communication or Covered Transfer

Citizens for Responsible Government

Table with 3 columns: Street Address, City/Town, State and Zip Code, Telephone Number. Values: 356 Cranston Street, Providence, RI 02908.

The Person, Business Entity or PAC has expended more than \$1000 to support or defeat a Candidate or Referendum as follows:

Identify the Candidate(s) on the ballot and whether funds were expended to support or defeat this candidate

_____ : Support Defeat

Identify the Referendum on the ballot and whether funds were expended to support or defeat this referendum

Question 3 : Support Defeat

Any person, business entity or political action committee making independent expenditures, electioneering communications, or covered transfers shall report all such expenditures provided the total of the money so expended exceeds \$1000 within a calendar year to the Board of Elections within 7 days of making the expenditure.

Table with 3 columns: Date of Expenditure, Amount of Expenditure, EXPENDITURES (Name and Full Address: Person, Business Entity, PAC Receiving Expenditure). Rows show multiple \$ amounts.

Year to Date Total of All Expenditures in Support or Defeat of This Candidate or Referendum: \$

Reports of independent expenditures, electioneering communications or covered transfers by a person, business entity or PAC shall disclose the identity of all donors of an aggregate of \$1000 or more within the current election cycle.

Table with 3 columns: Date Donation Received, Donation Amount, DONATIONS (Name, Address and Place of Employment of Donor). Row 1: 10/20/2014, \$10,000, NEA PAC for Education.

Amount from Person's, Business Entity's or PAC's own funds for independent expenditures, electioneering communications or covered transfers in Support or Defeat of this Candidate or Referendum: \$

< Please Sign on Reverse Side >

The person named below affirms, under penalty of false statement, that no expenditure contained herein is coordinated with the candidate or referendum whose support or defeat is promoted and that information provided is true and accurate and complies with RI General Laws and with Rules and Regulations adopted pursuant to RIGL §17-25.3 et seq.

Identification of Person Responsible for Making Expenditure

Signature of Person Responsible for Making Expenditure

Address, City/Town, State, Zip Code of Person Making Expenditure

Subscribed and Sworn to me this _____ Date

X _____
Notary Public

Reporting Requirements for Independent Expenditures, Electioneering Communications and Covered Transfers

WHO NEEDS TO FILE:

It is lawful for any person, business entity or political action committee (PAC), not otherwise prohibited by law and not acting in coordination with a candidate, authorized candidate committee, PAC or political party committee, to expend personally from that person's own funds a sum which is not to be repaid for any purpose not prohibited by law to support or defeat a candidate or referendum.

WHEN TO FILE:

Any person, business entity or PAC making independent expenditures, electioneering communications or covered transfers shall report all such expenditures, provided the total of the money so expended exceeds \$1000 within a calendar year, to the Board of Elections within seven (7) days of making the expenditure.

After a person, business entity or PAC files its initial report, the person, business entity or PAC shall file an additional report after each time the person, business entity or PAC makes or contracts to make independent expenditures, electioneering communications or covered transfers aggregating an additional \$1,000 with respect to the same election as that which the initial report relates.

When a report is required within thirty (30) days prior to the election to which the expenditure was directed, it shall be filed within twenty-four (24) hours of the expenditure. When such a report is required at any other time, it shall be filed within seven (7) days after the expenditure.

WHAT TO FILE:

Reports of independent expenditures, electioneering communications or covered transfers by a person shall contain the name, street address, city, state, zip code, occupation, employer, of the person responsible for the expenditure, the name street address, city, state, zip code of the person receiving the expenditure, the date and amount of each expenditure and the year-to-date total. The report shall also include a statement identifying the candidate or referendum that the independent expenditure or electioneering communication is intended to promote the success or defeat, and affirm under penalty of false statement that the expenditure is not coordinated with the candidate or referendum in question.

Reports shall also disclose the identify, which includes the name, address and place of employment and donation amount, of all donors of an aggregate of \$1000 or more to such person, business entity or PAC within the current election cycle.

PENALTIES:

Any person, who willfully and knowingly violates the provisions of Chapter 25.3 of Title 17 shall, upon conviction, be guilty of a misdemeanor and shall be fined not more than \$1000 per violation. The state Board of Elections may impose a civil penalty upon any person, business or PAC who violates the provisions of Chapter 25.3 of Title 17 in the amount of \$1000, or up to 150% of the aggregate amount of the independent expenditures, electioneering communications or covered transfers per violation, whichever is greater.

THIS FORM MUST BE RETURNED TO THE BOARD OF ELECTIONS BEARING ORIGINAL SIGNATURES.

If you have any questions on how to complete this form, please contact the Board of Elections.



State of Rhode Island and Providence Plantations

Board of Elections
 Campaign Finance Division
 50 Branch Avenue, Providence, Rhode Island 02904
 Tel. (401) 222-2345
 www.elections.ri.gov

RECEIVED
 8-12-14

11:31 AM

Time Stamp
 (Office Use Only)

**REPORT OF INDEPENDENT EXPENDITURES,
 ELECTIONEERING COMMUNICATIONS OR COVERED
 TRANSFERS (CF-8)**

Identify Person, Business Entity or PAC responsible for Independent Expenditure, Electioneering Communication or Covered Transfer

Citizens for Responsible Government

Street Address 365 Smith Street	City/Town, State and Zip Code Providence, RI 02908	Telephone Number
Employer (if applicable)	Occupation (if applicable)	

The Person, Business Entity or PAC has expended more than \$1000 to support or defeat a Candidate or Referendum as follows:

Identify the Candidate(s) on the ballot and whether funds were expended to support or defeat this candidate

_____ : Support Defeat

Identify the Referendum on the ballot and whether funds were expended to support or defeat this referendum

Constitutional Convention : Support Defeat

Any person, business entity or political action committee making independent expenditures, electioneering communications, or covered transfers shall report all such expenditures provided the total of the money so expended exceeds \$1000 within a calendar year to the Board of Elections within 7 days of making the expenditure.

Date of Expenditure	Amount of Expenditure	<u>EXPENDITURES</u>
		Name and Full Address: Person, Business Entity, PAC Receiving Expenditure
08/08/14	\$ 28487.50	Checkmate 22 London Street East Greenwich, RI 02818
	\$	
	\$	
	\$	
	\$	

Year to Date Total of All Expenditures in Support or Defeat of This Candidate or Referendum: \$

Reports of independent expenditures, electioneering communications or covered transfers by a person, business entity or PAC shall disclose the identity of all donors of an aggregate of \$1000 or more within the current election cycle.

Date Donation Received	Donation Amount	<u>DONATIONS</u>
		Name, Address and Place of Employment of Donor
08/08/2014	\$ 10000	Rhode Island Association for Justice
08/11/2014	\$ 2000	SEIU Local 32BJ
08/12/2014	\$ 300	SEIU RI State Council
08/12/2014	\$ 2500	RI Hospital UNAP
08/12/2014	\$ 3000	UNAP

Amount from Person's, Business Entity's or PAC's own funds for independent expenditures, electioneering communications or covered transfers in Support or Defeat of this Candidate or Referendum: \$

The person named below affirms, under penalty of false statement, that no expenditure contained herein is coordinated with the candidate or referendum whose support or defeat is promoted and that information provided is true and accurate and complies with RI General Laws and with Rules and Regulations adopted pursuant to RIGL §17-25.3 et seq.

Identification of Person Responsible for Making Expenditure	Subscribed and Sworn to me this _____ Date _____ X _____ Notary Public
Signature of Person Responsible for Making Expenditure	
Address, City/Town, State, Zip Code of Person Making Expenditure	

Reporting Requirements for Independent Expenditures, Electioneering Communications and Covered Transfers

WHO NEEDS TO FILE:

It is lawful for any person, business entity or political action committee (PAC), not otherwise prohibited by law and not acting in coordination with a candidate, authorized candidate committee, PAC or political party committee, to expend personally from that person's own funds a sum which is not to be repaid for any purpose not prohibited by law to support or defeat a candidate or referendum.

WHEN TO FILE:

Any person, business entity or PAC making independent expenditures, electioneering communications or covered transfers shall report all such expenditures, provided the total of the money so expended exceeds \$1000 within a calendar year, to the Board of Elections within seven (7) days of making the expenditure.

After a person, business entity or PAC files its initial report, the person, business entity or PAC shall file an additional report after each time the person, business entity or PAC makes or contracts to make independent expenditures, electioneering communications or covered transfers aggregating an additional \$1,000 with respect to the same election as that which the initial report relates.

When a report is required within thirty (30) days prior to the election to which the expenditure was directed, it shall be filed within twenty-four (24) hours of the expenditure. When such a report is required at any other time, it shall be filed within seven (7) days after the expenditure.

WHAT TO FILE:

Reports of independent expenditures, electioneering communications or covered transfers by a person shall contain the name, street address, city, state, zip code, occupation, employer, of the person responsible for the expenditure, the name street address, city, state, zip code of the person receiving the expenditure, the date and amount of each expenditure and the year-to-date total. The report shall also include a statement identifying the candidate or referendum that the independent expenditure or electioneering communication is intended to promote the success or defeat, and affirm under penalty of false statement that the expenditure is not coordinated with the candidate or referendum in question.

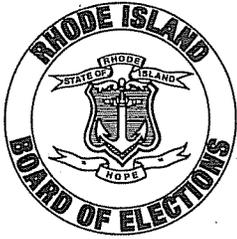
Reports shall also disclose the identify, which includes the name, address and place of employment and donation amount, of all donors of an aggregate of \$1000 or more to such person, business entity or PAC within the current election cycle.

PENALTIES:

Any person, who willfully and knowingly violates the provisions of Chapter 25.3 of Title 17 shall, upon conviction, be guilty of a misdemeanor and shall be fined not more than \$1000 per violation. The state Board of Elections may impose a civil penalty upon any person, business or PAC who violates the provisions of Chapter 25.3 of Title 17 in the amount of \$1000, or up to 150% of the aggregate amount of the independent expenditures, electioneering communications or covered transfers per violation, whichever is greater.

THIS FORM MUST BE RETURNED TO THE BOARD OF ELECTIONS BEARING ORIGINAL SIGNATURES.

If you have any questions on how to complete this form, please contact the Board of Elections.



State of Rhode Island and Providence Plantations

Board of Elections
 Campaign Finance Division
 50 Branch Avenue, Providence, Rhode Island 02904
 Tel. (401) 222-2345
 www.elections.ri.gov

RHODE ISLAND
 BOARD OF ELECTIONS

2014 JUL 10 A 10: 56

**REPORT OF INDEPENDENT EXPENDITURES,
 ELECTIONEERING COMMUNICATIONS OR COVERED
 TRANSFERS (CF-8)**

Time Stamp
 (Office Use Only)

Identify Person, Business Entity or PAC responsible for Independent Expenditure, Electioneering Communication or Covered Transfer
Citizens For Responsible Government

Street Address 365 Smith Street	City/Town, State and Zip Code Providence, RI 02908	Telephone Number
Employer (if applicable)	Occupation (if applicable)	

The Person, Business Entity or PAC has expended more than \$1000 to support or defeat a Candidate or Referendum as follows:

Identify the Candidate(s) on the ballot and whether funds were expended to support or defeat this candidate

_____ : Support Defeat

Identify the Referendum on the ballot and whether funds were expended to support or defeat this referendum

Constitutional Convention : Support Defeat

Any person, business entity or political action committee making independent expenditures, electioneering communications, or covered transfers shall report all such expenditures provided the total of the money so expended exceeds \$1000 within a calendar year to the Board of Elections within 7 days of making the expenditure.

Date of Expenditure	Amount of Expenditure	EXPENDITURES
		Name and Full Address: Person, Business Entity, PAC Receiving Expenditure
	\$	
	\$	
	\$	
	\$	
	\$	

Year to Date Total of All Expenditures in Support or Defeat of This Candidate or Referendum: \$

Reports of independent expenditures, electioneering communications or covered transfers by a person, business entity or PAC shall disclose the identity of all donors of an aggregate of \$1000 or more within the current election cycle.

Date Donation Received	Donation Amount	DONATIONS
		Name, Address and Place of Employment of Donor
5/22/14	\$ 4000	District 1199 SEIU 294 W. Exchange Street Providence, RI
5/22/2014	\$5000	United Food and Commercial Workers defense fund 278 Silver Spring ST. PVD
	\$	
	\$	
	\$	

Amount from Person's, Business Entity's or PAC's own funds for independent expenditures, electioneering communications or covered transfers in Support or Defeat of this Candidate or Referendum: \$

The person named below affirms, under penalty of false statement, that no expenditure contained herein is coordinated with the candidate or referendum whose support or defeat is promoted and that information provided is true and accurate and complies with RI General Laws and with Rules and Regulations adopted pursuant to RIGL §17-25.3 et seq.

Identification of Person Responsible for Making Expenditure

Kristen M Dart

Signature of Person Responsible for Making Expenditure

Kristen M Dart

Address, City/Town, State, Zip Code of Person Making Expenditure

67 Hamlin St. Floor 3 Providence, RI 02909

Subscribed and Sworn to me this July 9/2014
Date

x *Leann Byrne*
Notary Public

Reporting Requirements for Independent Expenditures, Electioneering Communications and Covered Transfers

WHO NEEDS TO FILE:

It is lawful for any person, business entity or political action committee (PAC), not otherwise prohibited by law and not acting in coordination with a candidate, authorized candidate committee, PAC or political party committee, to expend personally from that person's own funds a sum which is not to be repaid for any purpose not prohibited by law to support or defeat a candidate or referendum.

WHEN TO FILE:

Any person, business entity or PAC making independent expenditures, electioneering communications or covered transfers shall report all such expenditures, provided the total of the money so expended exceeds \$1000 within a calendar year, to the Board of Elections within seven (7) days of making the expenditure.

After a person, business entity or PAC files its initial report, the person, business entity or PAC shall file an additional report after each time the person, business entity or PAC makes or contracts to make independent expenditures, electioneering communications or covered transfers aggregating an additional \$1,000 with respect to the same election as that which the initial report relates.

When a report is required within thirty (30) days prior to the election to which the expenditure was directed, it shall be filed within twenty-four (24) hours of the expenditure. When such a report is required at any other time, it shall be filed within seven (7) days after the expenditure.

WHAT TO FILE:

Reports of independent expenditures, electioneering communications or covered transfers by a person shall contain the name, street address, city, state, zip code, occupation, employer, of the person responsible for the expenditure, the name street address, city, state, zip code of the person receiving the expenditure, the date and amount of each expenditure and the year-to-date total. The report shall also include a statement identifying the candidate or referendum that the independent expenditure or electioneering communication is intended to promote the success or defeat, and affirm under penalty of false statement that the expenditure is not coordinated with the candidate or referendum in question.

Reports shall also disclose the identify, which includes the name, address and place of employment and donation amount, of all donors of an aggregate of \$1000 or more to such person, business entity or PAC within the current election cycle.

PENALTIES:

Any person, who willfully and knowingly violates the provisions of Chapter 25.3 of Title 17 shall, upon conviction, be guilty of a misdemeanor and shall be fined not more than \$1000 per violation. The state Board of Elections may impose a civil penalty upon any person, business or PAC who violates the provisions of Chapter 25.3 of Title 17 in the amount of \$1000, or up to 150% of the aggregate amount of the independent expenditures, electioneering communications or covered transfers per violation, whichever is greater.

THIS FORM MUST BE RETURNED TO THE BOARD OF ELECTIONS BEARING ORIGINAL SIGNATURES.

If you have any questions on how to complete this form, please contact the Board of Elections.

Exhibit C

TITLE 17

Elections

CHAPTER 17-25

Rhode Island Campaign Contributions and Expenditures Reporting

SECTION 17-25-3

§ 17-25-3 Definitions. – As used in this chapter, unless a different meaning clearly appears from the context:

(14) "Electioneering communication" means any print, broadcast, cable, satellite, or electronic media communication not coordinated, as set forth in § 17-25-23, with any candidate, authorized candidate campaign committee, or political party committee and which unambiguously identifies a candidate or referendum and is made either within sixty (60) days before a general or special election or town meeting for the office sought by the candidate or referendum; or thirty (30) days before a primary election, for the office sought by the candidate; and is targeted to the relevant electorate.

Exhibit D

TITLE 17

Elections

CHAPTER 17-25.3

Independent Expenditures and Electioneering Communications

SECTION 17-25.3-3

§ 17-25.3-3 Disclaimers. – (a) No person, business entity or political action committee shall make or incur an independent expenditure or fund an electioneering communication for any written, typed, or other printed communication, unless such communication bears upon its face the words "Paid for by" and the name of the entity, the name of its chief executive officer or equivalent, and its principal business address. In the case of a person, business entity or political action committee making or incurring such an independent expenditure or electioneering communication, which entity is a tax-exempt organization under § 501(c) of the Internal Revenue Code of 1986 (other than an organization described in § 501(c)(3) of such Code) or an exempt nonprofit as defined in § 17-25-3, or any subsequent corresponding internal revenue code of the United States, as amended from time to time, or an organization organized under Section 527 of said code, such communication shall also bear upon its face the words "Top Five Donors" followed by a list of the five (5) persons or entities making the largest aggregate donations to such person, business entity or political action committee during the twelve (12) month period before the date of such communication, provided that no donor shall be listed who is not required to be disclosed in a report to the board of elections by the person, business entity, or political action committee.

(b) The provisions of subsections (a) of this section shall not apply to:

(1) Any editorial, news story, or commentary published in any newspaper, magazine or journal on its own behalf and upon its own responsibility and for which it does not charge or receive any compensation whatsoever;

(2) Political paraphernalia including pins, buttons, badges, emblems, hats, bumper stickers or other similar materials; or

(3) Signs or banners with a surface area of not more than thirty-two (32) square feet.

(c) No person, business entity or political action committee shall make or incur an independent expenditure or fund an electioneering communication for paid television

Mr. Richard Thornton
October 24, 2014

advertising or paid Internet video advertising, unless at the end of such advertising there appears simultaneously, for a period of not less than four (4) seconds:

(1) A clearly identifiable video, photographic or similar image of the entity's chief executive officer or equivalent; and

(2) A personal audio message, in the following form: "I am [REDACTED] (name of entity's chief executive officer or equivalent), [REDACTED] (title) of [REDACTED] (entity), and I approved its content."

(3) In the case of a person, business entity or political action committee making or incurring such an independent expenditure or electioneering communication, which person, business entity or political action committee is a tax-exempt organization under § 501(c) of the Internal Revenue Code of 1986 (other than an organization described in § 501(c)(3) of such Code) or an exempt nonprofit as defined in § 17-25-3, or any subsequent corresponding internal revenue code of the United States, as amended from time to time, or an organization organized under Section 527 of said code, such advertising shall also include a written message in the following form: "The top five (5) donors to the organization responsible for this advertisement are" followed by a list of the five (5) persons or entities making the largest aggregate donations during the twelve (12) month period before the date of such advertisement, provided that no donor shall be listed who is not required to be disclosed in a report to the board of elections by the person, business entity, or political action committee.

(d) No person, business entity or political action committee shall make or incur an independent expenditure or fund an electioneering communication for paid radio advertising or paid Internet audio advertising, unless the advertising ends with a personal audio statement by the entity's chief executive officer or equivalent;

(1) Identifying the entity paying for the expenditure; and

(2) A personal audio message, in the following form: "I am [REDACTED] (name of entity's chief executive officer or equivalent), [REDACTED] (title), of [REDACTED] (entity), and I approved its content."

(3) In the case of a person, business entity or political action committee making or incurring such an independent expenditure or electioneering communication, which entity is a tax-exempt organization under § 501(c) of the Internal Revenue Code of 1986 (other than an organization described in § 501(c)(3) of such Code) or an exempt nonprofit as defined in § 17-25-3, or any subsequent corresponding internal revenue code of the United States, as amended from time to time, or an organization organized under Section 527 of said code, such advertising shall also include:

(A) An audio message in the following form: "The top five (5) donors to the organization responsible for this advertisement are" followed by a list of the five (5) persons or entities making the largest aggregate donations during the twelve (12) month

Mr. Richard Thornton
October 24, 2014

period before the date of such advertisement, provided that no donor shall be listed who is not required to be disclosed in a report to the board of elections by the person, business entity, or political action committee; or

(B) In the case of such an advertisement that is thirty (30) seconds in duration or shorter, an audio message providing a website address that lists such five (5) persons or entities, provided that no contributor shall be listed who is not required to be disclosed in a report to the board of elections by the person, business entity, or political action committee. In such case, the person, business entity or political action committee shall establish and maintain such a website with such listing for the entire period during which such person, business entity or political action committee makes such advertisement.

(e) No person, business entity or political action committee shall make or incur an independent expenditure or fund an electioneering communication for automated telephone calls, unless the narrative of the telephone call identifies the person, business entity or political action committee making the expenditure and its chief executive officer or equivalent. In the case of a person, business entity or political action committee making or incurring such an independent expenditure, which entity is a tax-exempt organization under § 501(c) of the Internal Revenue Code of 1986 (other than an organization described in § 501(c)(3) of such Code) or an exempt nonprofit as defined in § 17-25-3, or any subsequent corresponding internal revenue code of the United States, as amended from time to time, or an organization organized under Section 527 of said code, such narrative shall also include an audio message in the following form: "The top five (5) donors to the organization responsible for this telephone call are" followed by a list of the five (5) persons or entities making the largest aggregate donations during the twelve (12) month period before the date of such telephone call, provided that no donor shall be listed who is not required to be disclosed in a report to the board of elections by the person, business entity, or political action committee.

History of Section.
(P.L. 2012, ch. 446, § 3.)

Exhibit E

TITLE 17

Elections

CHAPTER 17-25.3

Independent Expenditures and Electioneering Communications

SECTION 17-25.3-1

§ 17-25.3-1 Independent expenditures and electioneering communications for elections. – (a) It shall be lawful for any person, business entity or political action committee, not otherwise prohibited by law and not acting in coordination with a candidate, authorized candidate campaign committee, political action committee, or political party committee, to expend personally from that person's own funds a sum which is not to be repaid to him or her for any purpose not prohibited by law to support or defeat a candidate or referendum. Whether a person, business entity or political action committee is "acting in coordination with a candidate, authorized candidate campaign committee, political action committee or political party committee" for the purposes of this subsection shall be determined by application of the standards set forth in § 17-25-23. All terms used in this chapter shall have the same meaning as defined in § 17-25-3.

(b) Any person, business entity or political action committee making independent expenditures, electioneering communications, or covered transfers shall report all such campaign finance expenditures and expenses to the board of elections, provided the total of the money so expended exceeds one thousand dollars (\$1000) within a calendar year, to the board of elections within seven (7) days of making the expenditure.

(c) A person, business entity or political action committee who makes or contracts to make independent expenditures, electioneering communications, or covered transfers with an aggregate value of one thousand dollars (\$1,000) or more shall electronically file a campaign finance report to the board of elections describing the expenditures.

(d) After a person, business entity or political action committee files a report under subsection (b), the person, business entity or political action committee shall file an additional report after each time the person, business entity or political action committee makes or contracts to make independent expenditures, electioneering communications, or

Mr. Richard Thornton
October 24, 2014

covered transfers aggregating an additional one thousand dollars (\$1,000) with respect to the same election as that to which the initial report relates.

(e) When a report is required by subsection (c) or (d) of this section within thirty (30) days prior to the election to which the expenditure was directed, it shall be filed with twenty-four (24) hours of the expenditure. When such a report is required at any other time, it shall be filed within seven (7) days after the expenditure.

(f) Reports of independent expenditures, electioneering communications, or covered transfers by a person shall contain the name, street address, city, state, zip code, occupation, employer (if self-employed, the name and place of business), of the person responsible for the expenditure, the name, street address, city, state, and zip code of the person receiving the expenditure the date and amount of each expenditure, and the year to date total.

(g) The report shall also include a statement identifying the candidate or referendum that the independent expenditure or electioneering communication is intended to promote the success or defeat, and affirm under penalty of false statement that the expenditure is not coordinated with the campaign in question, and provide any information that the board of elections requires to facilitate compliance with the provisions of this chapter.

(h) Reports of independent expenditures, electioneering communications, or covered transfers by a person, business entity or political action committee shall also disclose the identity of all donors of an aggregate of one thousand dollars (\$1000) or more to such person, business entity or committee within the current election cycle, if applicable, unless the person, business entity or political action committee has established a separate campaign-related account for independent expenditures, electioneering communications, and covered transfers as detailed in § 17-25.3-2 in which case this paragraph applies only to donors to the person's, business entity's or political action committee's separate campaign-related account; provided that no person, business entity, or political action committee shall be required to disclose in a report to the board of elections the identity, which includes name, address, place of employment, and donation amount, of any donor who makes no donation to such person, business entity, or political action committee after the date of enactment of this section.

(i) If a person, business entity or political action committee and a donor mutually agree, at the time a donation, payment, or transfer to the person, business entity or political action committee which is required to disclose the identification under subsection (f) that the person, business entity or political action committee will not use the donation, payment, or transfer for independent expenditures, electioneering communications, or covered transfers, then not later than thirty (30) days after the person, business entity or political action committee receives the donation, payment, or transfer the person, business entity or political action committee shall transmit to the donor a written certification by the chief financial officer of the person, business entity or political action committee (or, if the organization does not have a chief financial officer, the highest ranking financial official of the organization) that:

Mr. Richard Thornton
October 24, 2014

(1) The person, business entity or political action committee will not use the donation, payment, or transfer for independent expenditures, electioneering communications, or covered transfers; and

(2) The person, business entity or political action committee will not include any information on the donor in any report filed by the person, business entity or political action committee under this section with respect to independent expenditures, electioneering communications, or covered transfers, so that the donor will not be required to appear in the list of donors.

(3) Exception for payments made pursuant to commercial activities. Subsections (e) and (f) do not apply with respect to any payment or transfer made pursuant to commercial activities in the regular course of a person's, business entity's or political action committee's business.

(j) For the purposes of this chapter, two (2) or more entities (other than an exempt nonprofit as defined in § 17-25-3 or an organization described in § 501(c)(3) of the Internal Revenue Code of 1986, or any subsequent corresponding internal revenue code of the United States, as amended from time to time) are treated as a single entity if the entities:

(1) Share the majority of members on their boards of directors;

(2) Share two (2) or more officers;

(3) A candidate committee and a political committee other than a candidate committee are for the purposes of this section treated as a single committee if the committees both have the candidate or a member of the candidate's immediate family as an officer;

(4) Are owned or controlled by the same majority shareholder or shareholders or persons;

(5) Are in a parent-subsidiary relationship; or

(6) Have bylaws so stating.

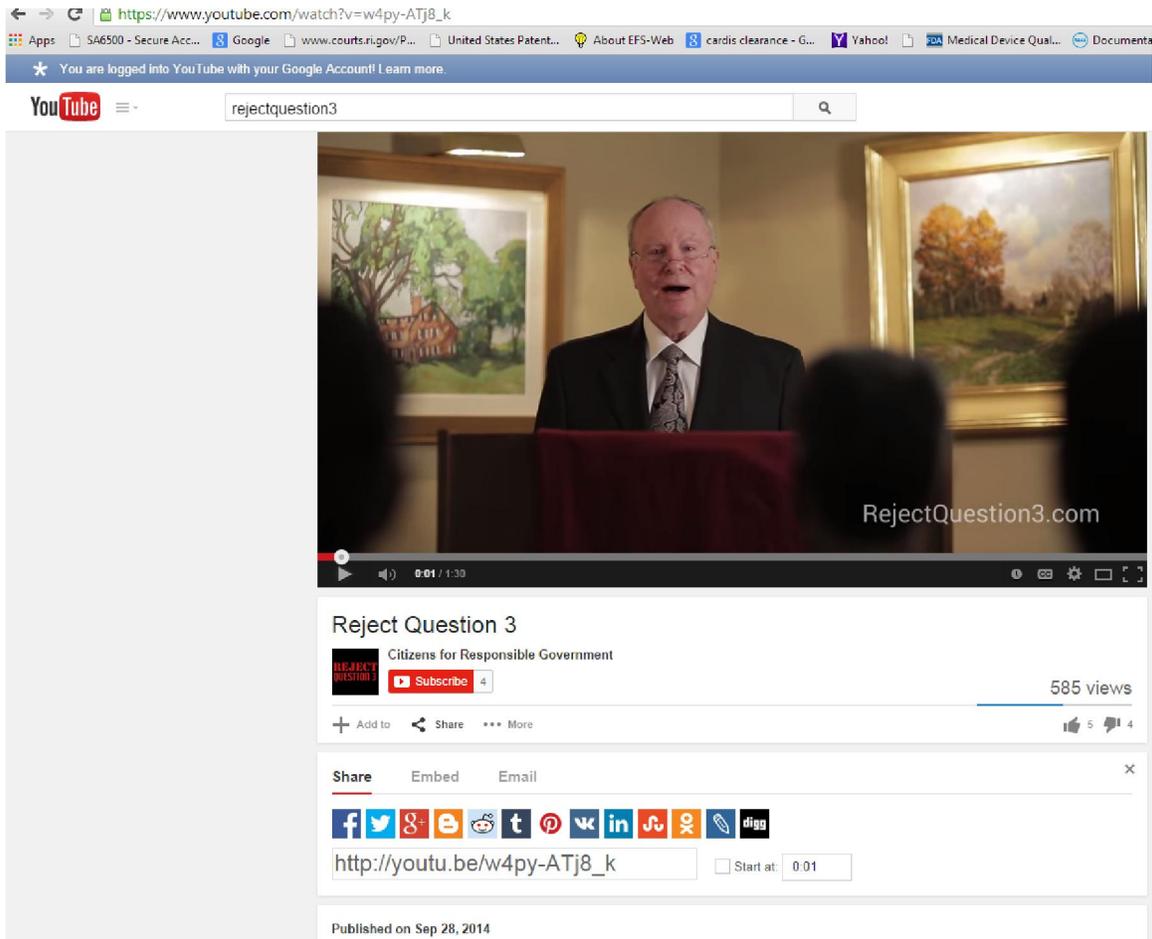
History of Section.
(P.L. 2012, ch. 446, § 3.)

Mr. Richard Thornton
October 24, 2014

Exhibit F

This video is currently running as a “pre-roll” paid internet video advertisement on YouTube and lacks the CEO names, organization addresses, and top 5 donors for CFRG or the twenty-one member organizations, as required in RIGL 17-25.3.

Video can be viewed at rejectquestion3.com, or at YouTube
https://www.youtube.com/watch?v=w4py-ATj8_k



Mr. Richard Thornton
October 24, 2014

Exhibit G paid internet video advertisement
(see enclosed USB drive)

Mr. Richard Thornton
October 24, 2014

Exhibit H

Billboard between exits 17 and 18, west of the southbound lane on route 95 (“Cadillac billboard”). This billboard lacks the CEO names, organization addresses, and top 5 donors for CFRG and the twenty-one member organizations, as required in RIGL 17-25.3.



Mr. Richard Thornton
October 24, 2014

Exhibit I

Billboard between exits 22 and 23, west of the southbound lane on route 95 (“State House billboard”). This billboard lacks the CEO names, organization addresses, and top 5 donors for CFRG and the twenty-one member organizations, as required in RIGL 17-25.3.



Mr. Richard Thornton
October 24, 2014

Exhibit J Internet Web Page rejectquestion3.com

rejectquestion3.com

REJECT QUESTION 3

FACTS STATEMENT OF PRINCIPLES NEWS SIGN THE PETITION COALITION PARTNERS VOLUNTEER CONTACT

Don't let wealthy special interests buy our Constitution. Reject Question 3 on Election Day.

Reject Question 3

Citizens for a Responsible Government is a coalition of individuals and organizations united to oppose the calling of a Rhode Island Constitutional Convention. We are urging Rhode Islanders to REJECT Question 3 because it will serve as a vehicle for socially divisive Constitutional amendments.

SIGN THE PETITION

DONATE

LATEST NEWS

[RINPR: Former Delegates Voice Opposition To RI Constitutional Convention](#)

[Jim Vincent Commentary](#)

[Delegates to 1986 R.I. Constitutional Convention](#)

LATEST FROM TWITTER

Tweets

[Citizens](#) @CITIZENSGOV 23 Oct
#RIConCon FACT: ConCon is NOT a purer form of #Democracy. Learn more about why you should #reject3 at [rejectquestion3.com/facts/](#)

VOLUNTEER

To volunteer on our campaign and help spread our message, sign up here.

Full Name (required)

Mr. Richard Thornton
October 24, 2014

Exhibit K Internet Web Page www.crfg.org/news

The screenshot shows the website for Citizens for Responsible Government. The header features the organization's name and logo, along with navigation links for NEWS, FACTS, STATEMENT OF PRINCIPLES, COALITION PARTNERS, VOLUNTEER, and CONTACT. The main content area displays a news article dated August 19, 2014, titled "Written Testimony of Roberto Gonzalez, Esq. to the Constitutional Convention Bi-Partisan Commission". The article text begins with "Greetings Honorable Members of the Constitutional Convention Bi-Partisan Commission. My name is Roberto Gonzalez. I am a resident of the City of East Providence. I served as a delegate to the 1986 Constitutional Convention. I was just finishing law school at the time, and was full of idealism and had a burning desire to serve. I cannot begin to tell you how disillusioned I became with the 1986 Con-Con process and especially with the end result." A "READ MORE" button is located at the end of the article text. Below the article is a section for the National Association of Social Workers (NASW) Rhode Island Chapter, providing their address (220 West Exchange Street, Suite 007, Providence, Rhode Island 02903), telephone number (401-274-4940), and facsimile number (401-274-4941). On the right side of the page, there are sections for "FOLLOW US" with social media icons for Facebook, Twitter, and YouTube; "LATEST NEWS" featuring articles about Roberto Gonzalez and Pablo Rodriguez; "LATEST TWEETS" showing tweets from Citizens for Responsible Government and Planned Parenthood; and a "VOLUNTEER" section with a call to action to sign up.

ricfg.org/category/news/

Google

CITIZENS for RESPONSIBLE GOVERNMENT

NEWS FACTS STATEMENT OF PRINCIPLES COALITION PARTNERS VOLUNTEER CONTACT

August 19, 2014

Written Testimony of Roberto Gonzalez, Esq. to the Constitutional Convention Bi-Partisan Commission

Greetings Honorable Members of the Constitutional Convention Bi-Partisan Commission. My name is Roberto Gonzalez. I am a resident of the City of East Providence. I served as a delegate to the 1986 Constitutional Convention. I was just finishing law school at the time, and was full of idealism and had a burning desire to serve. I cannot begin to tell you how disillusioned I became with the 1986 Con-Con process and especially with the end result.

[READ MORE](#)

NASW RHODE ISLAND CHAPTER
National Association of Social Workers

220 West Exchange Street, Suite 007
Providence, Rhode Island 02903
Telephone 401-274-4940
Facsimile 401-274-4941

FOLLOW US

[f](#) [t](#) [yt](#)

LATEST NEWS

Roberto Gonzalez, Esq., '86 Con Con Delegate, Shares His Experience

National Association of Social Workers Testimony

Pablo Rodriguez – Former Medical Director for Planned Parenthood of Rhode Island, Testifies

LATEST TWEETS

CITIZENS @CFRGov 23 Oct
#RISConCon FACT, ConCon is NOT a purer form of #Democracy. Learn more about why you should #Reject3R1 at rejectquestion2.com/facts/#RhodyVotes

Planned Parenthood @ppvotesri 18 Oct
Do you think that spending millions on a convention to take away women's rights make

Tweet to @CFRGov

VOLUNTEER

To volunteer on our campaign and help spread our message, sign up here.

Mr. Richard Thornton
October 24, 2014

Exhibit L Facebook Internet Web Page

The screenshot shows a Facebook event page for "REJECT QUESTION 3". The browser address bar displays "https://www.facebook.com/events/274932909384060/". The page header includes navigation links for "Home" and "Find Friends". On the left sidebar, there are options for "MY EVENTS" including "Upcoming", "Calendar", "Past", and "Create". The main event banner features a stack of money and the text: "Don't let wealthy special interests buy our Constitution. REJECT QUESTION 3. www.RejectQuestion3.com". Below the banner, it indicates the event is "Public - Hosted by Citizens for Responsible Government" and provides options to "Join", "Save", or "Invite". The event details show it is on "Tuesday, November 4 at 7:00am - 8:00pm" at "Your Local Polling Location". A detailed description states: "We are urging Rhode Islanders to REJECT Question 3 – and REJECT a Constitutional Convention – because it will serve as a vehicle for socially divisive Constitutional amendments. Approval of a Constitutional Convention is a significant threat to our civil rights. Across the country, issues like affirmative action, reproductive rights, gay rights, worker rights, and immigrant rights, have become fodder for expensive statewide campaigns mounted by wealthy, out-of-state special interests. Since there are no limits on how much money wealthy individuals and corporations can spend on referenda campaigns, we will see an influx of out-of-state money that distorts campaigns. By rejecting Question 3, we will ensure that our Constitution is not put up for sale." The "GUESTS" section shows 130 going, 5 maybe, and 776 invited. There are "INVITE FRIENDS" buttons and a "POSTS" section with a post from "Deb D'Amico Bergner" who is going. A "SUGGESTED EVENTS" section is also visible.

Exhibit M

TITLE 17

Elections

CHAPTER 17-25.2

Ballot Question Advocacy and Reporting

SECTION 17-25.2-9

§ 17-25.2-9 Penalties for violation. – (a) Whenever the board of elections has reason to believe that a ballot-question advocate willfully and knowingly made a false statement in any report required under this chapter or failed to file any report, or has otherwise violated this chapter, the board of elections may, in addition to all other actions authorized by law, request the attorney general to bring an action in the name of the state of Rhode Island in the superior court against the person signing any such report and/or organization to enjoin them from continuing the violation, or doing any acts in furtherance of the violation, and for any other relief the court deems appropriate. In addition, the court may order the forfeiture of any and all contributions not reported in violation of this chapter.

(b) The court may also impose a civil penalty for any violation of this chapter up to but not exceeding three (3) times the amount of:

(1) Contributions and/or expenditures made or accepted in violation of this chapter;
and/or

(2) Contributions or expenditures not reported as required by this chapter.

(c) All funds collected pursuant to this section shall be deposited in the fund established by the state for public information and education regarding the election process.

History of Section.

(P.L. 2006, ch. 174, § 2; P.L. 2006, ch. 292, § 2.)

Exhibit N

TITLE 17

Elections

CHAPTER 17-25.3

Independent Expenditures and Electioneering Communications

SECTION 17-25.3-4

§ 17-25.3-4 Penalties. – (a) Any person who willfully and knowingly violates the provisions of this chapter shall, upon conviction, be guilty of a misdemeanor and shall be fined not more than one thousand dollars (\$1,000) per violation.

(b) The state board of elections may impose a civil penalty upon any person, business entity, or political action committee who violates the provisions of this chapter in the amount of one thousand dollars (\$1,000), or up to one hundred fifty percent (150%) of the aggregate amount of the independent expenditures, electioneering communications, or covered transfers per violation, whichever is greater.

History of Section.
(P.L. 2012, ch. 446, § 3.)