

PUBLIC INTEREST

— LEGAL FOUNDATION —

October 18, 2016

Office of the General Counsel
Federal Election Commission
999 E Street, NW
Washington, D.C. 20463

Re: Complaint Against Hillary for America, the Democratic National Committee, Democracy Partners, Americans United for Change, and other known and unknown individuals and groups.

To Whom It May Concern:

Complainant

The Public Interest Legal Foundation (“PILF”) is a non-profit educational and legal foundation dedicated to protect the right to vote, preserve the Constitutional framework of American elections, and educate the public on the issue of election integrity. As part of its mission, PILF gathers and analyzes information regarding potential violations of federal and state election laws and informs the public about these violations and concerns.

This complaint is filed on behalf of the Public Interest Legal Foundation by Joseph A. Vanderhulst, Legal Counsel with PILF at 209 West Main Street, Plainfield, Indiana 46168, pursuant to 52 U.S.C. § 30109(a)(1).

Respondents

Hillary for America
(Committee ID C00575795)
P.O. Box 5256
New York, NY 10185-5256

Jose H. Villarreal
Treasurer, Hillary for America
P.O. Box 5256
New York, NY 10185-5256

Democratic National Committee
430 South Capitol Street Southeast
Washington, DC 20003

Democracy Partners
1250 Eye Street, NW, Ste. 250
Washington, DC 20005
Bob Creamer
Strategist, Democracy Partners
1250 Eye Street, NW, Ste. 250
Washington, DC 20005

Americans United for Change
P.O. Box 34606
Washington, D.C. 20043
202-470-6954

Scott Foval
National Field Director, Americans United for Change
P.O. Box 34606
Washington, D.C. 20043
202-470-6954

Voces de la Frontera Action
1027 S. 5th Street
Milwaukee, WI 53204
Tel. 414-643-1620

Unknown Groups and Individuals Associated with Respondents

Summary

This complaint is based on information and belief that respondents have engaged in public communications, campaign activity, targeted voter registration drives, and other targeted GOTV activity under 11 C.F.R. 100.26 and 11 C.F.R. 114.4 at the request, direction, and approval of the Hillary for America campaign committee and the Democratic National Committee in violation of 11 C.F.R. 109.20 and 11 C.F.R. 114.4(d)(2) and (3).

Complainant's information and belief is based on findings from an investigation conducted by Project Veritas Action and their published reports regarding the same, as well as on news sources.

“If the Commission, upon receiving a complaint . . . has reason to believe that a person has committed, or is about to commit, a violation of [the FECA] . . . [t]he Commission shall make an investigation of such alleged violation . . .” 52 U.S.C. § 30109(a)(2); *see also* 11 C.F.R. § 111.4(a).

Facts and Violations

Alien Registration Drives

On information and belief based on published reports and findings from an investigation by Project Veritas Action, several groups including Americans United for Change and Voces de la Frontera Action and other unknown groups have engaged in voter registration drives and other GOTV activity during the 2016 election cycle. These activities potentially registered persons who were not citizens. This activity is regulated under 11 C.F.R. 114.4.

On the same information and belief, these voter registration drives and other GOTV activity were coordinated with DNC and HFA by express communication through agents of Democracy Partners and The Foval Group. These communications resulted in coordination of voter registration activity in violation of 11 C.F.R. 114.4(c)(2) and (d)(2)-(4) by all parties involved.

Also, because they were coordinated with a political party or campaign, these voter registration activities deliberately targeted demographic groups because they were statistically more likely to support a particular party or candidate in violation of 11 C.F.R. 114.4(c)(2) and (d)(2)-(4) by all parties involved.

Paid Protesters

As reported in several news sources, disruptions, including incidents of violence, have occurred at rallies held by the Trump for President campaign. Based on published reports, these disruptions were instigated by paid and/or trained professional protestors arranged by third party groups at the coordination and direction of agents of Democracy Partners and The Foval Group at the request and approval of agents of DNC and HFA.

These communications by paid and/or trained protesters constituted public communications under 11 C.F.R. 109.21(c) by all parties and groups involved.

On information and belief based on published reports and findings from an investigation by Project Veritas Action, these disruptions include the payment of protesters "wherever Trump and Pence are going to be." Based on these reports, it appears that all violent disruptions at Trump for President campaign rallies have been executed by paid protesters trained and instructed in their speech and conduct to advocate against Trump and in support of Clinton.

On information and belief based on the same source, agents of DNC and HFA communicated with the third party groups and individuals engaging in the activity and content through agents of Democracy Partners and The Foval Group in order to request and approve the communications. Through a direct chain of communication, this constituted coordination under 11 C.F.R. 109.21(d)(1)-(5).

Other Public Communications and Campaign Activities

On information and belief based on published reports, all public communications as defined in 11 C.F.R. 109.21(c) done by Americans United for Change, including the activities described in Exhibit A, were done at or with the direction, approval, suggestion, or after material discussion regarding the timing, content, and audience of the communications, of the DNC and Hillary for America campaign.

Conclusion

Upon information and belief, and based upon the facts set forth above, Respondents Hillary for America, the Democratic National Committee, Democracy Partners, Americans United for Change, and their agents, named and unnamed above, have, each of them, individually and collectively, violated the Federal Election Campaign Act of 1971, as amended, and must be held accountable and liable for their unlawful actions.

On behalf of PILF, I hereby request an investigation into whether the respondents identified above, or any other related parties, have violated federal campaign finance laws. The information uncovered by this investigation, including this initial complaint, will be used by PILF to educate the American people about the laws governing our elections and current and potential threats to election integrity.

Thank you for your prompt attention to this matter. Please contact me if you have further questions.

Respectfully submitted,

PUBLIC INTEREST LEGAL FOUNDATION

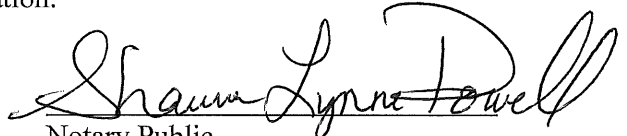
Joseph A. Vanderhulst
Legal Counsel

I hereby affirm and state under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge and belief, based on information and belief.



Joseph A. Vanderhulst

Subscribed and sworn to me on this 18 day of October, 2016, by Joseph A. Vanderhulst, Counsel with Public Interest Legal Foundation.



Notary Public



Fall 2016 Plan to Motivate Voters:

Americans United for Change Progressive Economic Campaign 2016

Vote November 8th for a Stronger Economy that Makes Us Stronger Together

The economic anxiety of Americans from across the political spectrum has been a recurring theme during the 2016 election season. It is forefront on voters' minds and has been central to voter mobilization in the primaries. Voters as disparate as those who supported Bernie Sanders to those who continue to support Donald Trump have expressed anxiety, and often outright anger, at stagnant wages, underemployment, the high cost of college, the wealthy not paying their fair share of taxes and those at the top calling all the shots, just to name a few.

Incomes are not flat for most Americans because the economy as a whole has failed to grow. In fact, per person gross domestic product in the United States has increased 48% over the last 30 years. America is wealthier per person today than at any time in its history.

Incomes are not flat because immigrants and poor people have taken money from the pockets of ordinary workers. The data shows that incomes are flat because billionaires like Donald Trump have siphoned off virtually every dime of that per person economic growth and kept it for themselves.

Trump and the alt-right are using immigrants and Muslims as scapegoats in the long tradition of right wing nationalist movements throughout modern history.

To counter the white supremacist alt-right narrative between now and Election Day, we must simultaneously mobilize recent immigrants to vote and offer a clear and compelling economic narrative that provides clear, progressive solutions to the wage stagnation that provides the fertile ground in which right wing authoritarian nationalism takes root.

To some extent the Democratic progressive economic agenda has recently been obscured by distractions and controversies mostly having to do with the unique presidential candidacy of Donald Trump. In fact, if the election were held today and Democrats won up and down the ballot in a landslide, conventional wisdom would be that Donald Trump had tanked the Republican ticket and that Democrats had no mandate to take action on the most important issues facing the American people.

That is why it is imperative that those of us who care about making progress on a host of progressive economic issues push these issues to the forefront of campaigns across the country in



the lead up to Election Day. We know that these issues matter to voters, and will be key to our economic progress in 2017 and beyond.

And it is also imperative that resources be directed to data driven efforts to register and turn out immigrant voters, so that when the smoke from 2016 clears there can be no question that no Republican will ever again win the presidency while espousing anti-immigrant, rightwing nationalist views in the United States.

Americans United for Change is uniquely positioned to run a campaign in key states and Congressional districts across the country to promote popular progressive economic policy goals, to support the progressive candidates who advocate for those goals, and to hold Donald Trump and Republicans accountable for supporting policies that favor fat-cat donors, corporations and the wealthiest few over everyone else.

It is also well positioned to oversee fully integrated, targeted get out the vote operations among recent immigrant voters in key states. In fact, Americans United for Change personnel have decades of experience organizing, managing and overseeing hundreds of field based door to door get out the vote efforts.

Combined, our efforts this fall will serve the dual functions of keeping these issues in the media, and also energizing our voters, particularly progressive voters, who are motivated and passionate about the economy and the progressive solutions in which we believe.

Working with our allies in labor, immigration, the civil rights, and money in politics communities on the ground, we will be able to reach a wide array of voters who are motivated and passionate about these issues—while also conveying our message that is extremely popular to voters across the political spectrum.

The Plan

Americans United for Change is proposing to run a campaign for the eight weeks leading up to the election on November 8th in 17 key states that combines Get Out the Vote messaging with progressive economic policy proposals that polling in the past has shown both have the potential to turn out our core supporters and persuade undecided voters to join our side. The working title of this effort is: **Vote November 8th for a Stronger Economy that Makes Us Stronger Together** – which combines the imperative to push people to vote with the aspirational desire for a stronger economy and a less divided country.

Elements of AUFC's economic messaging initiative will include:

- **A dedicated national rapid response operation** to hold Republicans accountable for their positions on the economy throughout the course of the campaign.
- **A digital operation for both GOTV, persuasion and rapid response** around core progressive economic issues targeted at key states and races.

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- **A field operation that will include field/communications capacity in five core states to conduct rapid response and hold proactive events.** Those states would be: Nevada, Florida, Wisconsin, Pennsylvania, and Ohio. We will be running a concurrent Social Security project targeting Republican Senate candidates in these same states—an issue we know is strongly motivating for certain sets of voters.
- **A national bus tour** promoting core progressive economic issues and candidates and lambasting Trump and GOP candidates for their positions favoring the wealthy. The bus tour would wind its way through these five core states and twelve more (New Hampshire, North Carolina, Virginia, Georgia, Illinois, Indiana, Colorado, Arizona, Maine, New York, Missouri and Nebraska). These twelve states, along with the core five mentioned above, provide a desirable overlap of core presidential battleground states, presidential expansion states, key swing and potential wave opportunity Senate and House race battlegrounds and a handful of key gubernatorial races. The chart below shows the overlap of key races in the 17 states mentioned above. *In the past, similar tours conducted by Americans United for Change have generated earned media that is the equivalent of advertising costing three times as much. And the persuasive power of earned media is substantially greater than paid TV commercials.*
- **Measurement:** Quantifiable value of television press coverage based on estimate of equivalent TV advertising per news service TVEyes.
- **Prioritization:** Our five top priority states include **Nevada, Florida, Wisconsin, Pennsylvania and Ohio.** A list of 17 target states that would be the focus of the “Full Program” are listed below.

States:

	POTUS	Senate	House	Gov.
Florida	X	Rubio	FL-07 (Red to Blue) FL-10 (Red to Blue) FL-13 (Red to Blue) FL-18 (Red to Blue) FL-26 (Red to Blue)	
Nevada	X	Open	NV-03 (Red to Blue) NV-04 Red to Blue)	
Ohio	X	Portman		
Pennsylvania	X	Toomey	PA-08 (Red to Blue) PA-16	

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			(Emerging Races)	
Wisconsin	X	Johnson	WI-08 (Red to Blue)	
Arizona	X	McCain	AZ-1 (Red to Blue) AZ-2 (Emerging Candidates)	
Colorado	X	Bennet	CO-03 (Red to Blue) CO-06 (Red to Blue)	
Georgia	X			
Illinois		Kirk	IL-10 (Red to Blue)	
Indiana		Open	IN—09 (Red to Blue)	Open
Maine	X		ME-2 (Red to Blue)	
Missouri	X			Open
Nebraska	X			
New Hampshire	X	Ayotte	NH-01 (Red to Blue)	Open, Primary Sept. 13
New York			NY-01 (Red to Blue) NY-03 (Red to Blue) NY-19 (Red to Blue) NY-21 (Red to Blue) NY-22 (Red to Blue) NY-23 (Red to Blue) NY-24 (Red to Blue)	
North Carolina	X	Burr		Pat McCrory
Virginia	X		VA-04 (Red to Blue) VA-10 (Red to Blue) VA-05 (Emerging	

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			Races)	
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Subject to input from stakeholders, this campaign would focus on the following core, progressive economic goals:

→**Making the tax system fair for everyone:** Everyone should pay their fair share, even the wealthy and corporations.

We must:

- Make sure millionaires pay a tax rate at least as high as that paid by middle-class taxpayers.
- Close tax loopholes for companies that move jobs overseas and/or avoid paying taxes.

→**Improve the incomes of ordinary Americans – including recent immigrants.**

We must:

- Strengthen and protect unions, who are central to a strong and thriving middle class.
- Pass the Equal Pay Act to ensure equal pay for equal work, which will help women and their families get fairly compensated for the hours they are already working.
- Pass comprehensive immigration reform.
- Crack down on corporations that cheat workers out of pay for the hours they have worked.
- Protect and enhance Social Security.
- Ensure workers have access to paid family and medical leave.
- Raise the minimum wage, which will not only help workers making the minimum wage but also help lift all incomes.

→**Make investments that will create jobs and grow the economy.**

We must:

- Increase infrastructure investments that create jobs, such as roads, bridges, schools and mass transit.
- Invest in clean renewable energy sources to create jobs and reduce dependence on foreign oil.

→**Make college more affordable and accessible.**

We must:

- Reduce the cost of going to college and the burden of student debt.
- Ensure all community colleges offer tuition free of charge.

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- Make sure students have the option of graduating from a state college or university free of student debt.
- Enable borrowers with high interest rates to refinance their student loans at the current rates.
- Increase funding for K-12 public schools.

Our Latino Mobilization Initiative will focus on recent immigrant voters in the State of Wisconsin.

The program will be conducted by Voces de Frontera Action (plan and full budget attached).

Their entire program involves voter mobilization using door-to-door canvassing, phone contact, radio and TV, mail and robo calls.

Americans United for Change proposes to finance the bulk of the door-to-door component of this effort and will receive reports measuring progress weekly measuring GOTV voter contacts at the door and conversations at the door.

The entire Voces de Frontera project is targeted to 20,463 Latino households in Milwaukee, Racine and Greenbay that have a lower propensity to vote. This represents approximately 60% of the overall Latino population.

Each of these households will get 3 knocks on the door, for a total of 61,389 contacts that either result in actual conversations or door hangers left urging the household to vote.

In our experience approximately 40% of these contacts will result in actual voter conversation or about 24,555.

The overall Voces de Frontera project has a budget of \$180,000 .

Currently the project has a financial shortfall of \$50,000, **which would go entirely to finance the door-to-door voter mobilization effort in Milwaukee** which has a direct cost of \$56,000. This portion of the program is expected go generate the lions share of overall GOTV voter contacts.

Americans United for Change will receive weekly updates on the progress of the project at reaching in goals.

Overall Budgets

Americans United for Change has prepared two budget options. The **first “Base Line” budget** will allow for full support of the Voces de Frontera Milwaukee plan and also a full economic messaging program and bus tour in **5 states**.



The second “Full Project” budget allows for full support of the Voces de Frontera Milwaukee plan and full economic messaging program and bus tour in **17 states**.

The organization continues to raise funds and hopes to assemble enough resources to do the full plan of 17 states, though it can begin work on the project if enough is raised to support its “base line” budget projections.

Proposed Base Line Budget for Americans United Plan for 5 States:

Voter Mobilization Operation: \$50,000

Field/Communications Staff: \$30,000

Signs, collateral, and event costs: \$7,500 (\$1,500 per state)

Digital GOTV and bus tour promotion: \$10,000

Bus tour costs September/October—\$102,000 (wrap, sound system, staffing, advance team and consultants, drivers, hotels, permits, ancillary event costs)

TOTAL: \$200,000

Proposed Full Program Budget for Americans United Plan for 17 States:

Voter Mobilization Operation: \$50,000

Field/Communications Staff: \$50,000

Signs, collateral, and event costs: \$25,500 (\$1,500 per state)

Digital GOTV and bus tour promotion: \$25,000

Bus tour costs September/October—\$275,000 (wrap, sound system, staffing, advance team and consultants, drivers, hotels, permits, ancillary event costs)

TOTAL: \$425,500

VOCES DE LA FRONTERA ***ACTION***

Latinos in the Badger State: Building a progressive Latino voting bloc 2016 and beyond

Voces de la Frontera Action is the c4 arm of Voces de la Frontera. Voces is Wisconsin's largest Latino membership-led organization and advocates for the rights of immigrants, students and workers.

Our members are predominantly low-income Latinos and immigrants residing in Southeastern Wisconsin, mainly in the cities of Milwaukee and Racine, where 60% of Wisconsin's Latino population resides. We also have an active membership in most of the state's geographic areas where Latinos are concentrated: Dane County, Waukesha County and Walworth County. Voces' youth arm is called Youth Empowered in the Struggle (YES) and is organized into school chapters. Voces de la Frontera Action has 680 adult members current in their annual dues. YES has 14 chapters (in both Milwaukee and Racine)-11 high schools, one middle school, and 2 college. There are 130 youth members aged 14-24 current in their dues, with the majority of students in high school. The ethnic makeup of Voces' youth organizing started with 2nd and 3rd generation Chicano students, and then grew to include immigrant youth, as well as African-American students and white working class youth.

This year we are very focused on further statewide growth. On February 18th our organizing efforts made headlines across the state, country, and even internationally when over 40,000 Latino workers participated in a general strike and mobilization on the Capitol to oppose anti-immigrant bills AB 450 (anti-sanctuary cities/show me your papers law) and SB 533 (preventing counties from issuing local IDs). We are engaging emerging leaders and new members as we bring the same high energy to get out the Latino vote and put progressive pro-immigrant candidates into office. Voces de la Frontera Action members endorsed Russ Feingold, a very pro-immigrant progressive, in his US Senate race against Ron Johnson, an anti-immigrant Tea Party Republican and Hillary Clinton for US president. In the Green Bay area there is a US Congress open seat, in which the Latino vote could have impact. In the last election for that seat, the margin of victory was around 2,500 votes. Latinos eligible to vote in the City of Green Bay are around 2,250, and only 15% turned out to vote in the previous election.

Background

Voces de la Frontera Action (Voces) and our youth arm Youth Empowered in the Struggle (YES!) has a strong record for successfully organizing low income Latino and African American voters in key wards in Milwaukee and Racine since 2004 which has contributed to our deep trust in these communities. In 2011 Voces de la Frontera c3 successfully advocated for redistricting maps at the school board and city aldermanic level to create new districts that encompassed the growing Latino community. At the state level, Voces de la Frontera successfully defeated a state legislative effort to disenfranchise Latino voters in Milwaukee through the redistricting process.

The U.S. Citizen children of DAPA eligible parents, in combination with naturalized voters (72,000 LPRs' statewide) and increased registration and turnout of the Latino vote, represents a powerful pro-immigrant voting block that has the potential turn Wisconsin into a pro-immigrant, progressive state, similar to California. According to a November 2015 report, "DAPA Matters: The Growing Electorate Directly affected by Executive Action on Immigration," Wisconsin is one of 22 states where U.S. Citizen children directly impacted by DAPA, will have a significant impact on the presidential elections. For Wisconsin, U.S. Citizen children of DAPA eligible parents, turning 18 and eligible to vote in November 2016, represent 6,406 votes or 3% of the state's 7.1% (213,019) margin of victory in 2012. In 2020, this number doubles and 11,638 of DAPA affected youth votes in Wisconsin jumps to 5% of the 7.1% margin of victory in 2012. **This voting block is significant in WI and nationally because the Latino voting population is growing while other ethnic group numbers are declining.**

This potential is not lost on conservative forces. The Koch brothers have targeted Wisconsin Latino voters by starting a LIBRE group and have hired a statewide organizer as a way to engage Latino voters in 2016 and future elections. Conservatives have been running year round advertisement through America's PAC on both African American and Spanish language radio. In addition, the state legislature just passed one of the most restrictive voter ID laws in the country that will take effect this year.

Voces de la Frontera has a strong partnership with progressive coalition partners at the local and statewide level advocating for immigrant and racial rights, economic justice, and protecting public education. In 2014, in **Racine**, WI we worked in a universe of just under 21,000 voters and organized in the top 14 wards with highest concentrations of Black and Latino voters. This year we plan to build off of the successful canvass structure that produced over 78% voter turnout in the target wards on election-day in Racine during the 2014 elections. In November 2014, YES in Racine won a school funding referendum at a time when public education funding was (and still is) under attack. In **Milwaukee**, in 2014, Voces de la Frontera Action focused on 15 majority-Latino wards in Milwaukee's near South Side. Voter turnout jumped 25% in our wards comparable to the comparable election four years ago. This represented a historic accomplishment

since for the first time since 2004, the Latino dense wards we worked in, turned out at higher rate than the rest of the city. The growth rate in our wards was more than double the 10.6% increase throughout the rest of the City. In addition, while the Voces de la Frontera Action endorsed candidate for governor lost statewide, winning 46.6% of 2.4 million votes, in Voces de la Frontera Action's 15 wards, the preferred candidate won 79.5% of the vote: 3,952 to 1,018. Latino voters were more aligned with the issues and the candidate unlike a state trend of voters supporting local referendums for a living wage yet voting for the gubernatorial candidate that opposed a living wage. This level of participation and candidate choice countered the national trend of Latino voting in November 2014.

The November 2016 presidential elections are critical to protecting deferred action for 5 million students and parents (DACA/DAPA), challenging racist politics in the US mainstream, and building renewed momentum for good legislative immigration reform and winning strong administrative relief and bad enforcement in the first 100 days of the presidency. In addition, to building a strong united front with other progressive forces on both a economic and civil rights agenda.

Wisconsin, a swing state, in which the Latino vote is important, is critical in national elections because of the presidential elections, the Wisconsin US Senate race with challenger Russ Feingold versus Tea Party Senator Ron Johnson (who heads the DHS Committee), and increasing accountability to US House Speaker Paul Ryan for his anti-worker, anti-immigrant agenda and whose district is vulnerable to a left challenge in coming election cycles given his own small 11 point margin of victory in 2012 in his congressional district

(See article: <http://www.jsonline.com/blogs/news/340463461.html>).

VOCES DE LA FRONTERA ACTION UNIVERSE

1. In Milwaukee, 10 paid canvassers plus volunteers [10 per week at the start, building to 40 per week at the end]
2. Attached is a list of our target wards in Milwaukee, along with demographic data for each. In summary:
 - a. 48 wards
 - b. total population (2012 data): 101,095 people [about one-sixth of the City of Milwaukee]
 - c. 18,752 doors, to be canvassed three times
 - d. total voting age population: 67,249
 - e. total Latino voting age population: 40,060
 - f. Latinos are 60% of the voting age population in these 48 wards combined; median Latino proportion is 65%
3. Timeline in Milwaukee:
 - a. First pass completed by Sept. 17
 - b. Second pass completed by Oct. 15

- c. Third pass completed by Nov. 5
 - d. Our first canvass was Saturday, Aug. 20. As of today (Tuesday, Aug. 23] we have worked in 5 wards [235-239]
4. In addition to canvassing, we will follow up with best prospects using the RVP (Regional Voting Program].
 - a. Weekly session at Voces Action office every Tuesday, 5:30-7:00. The goal is to sign up at least 10 people each week for our “soft ask;” that is, a pledge to contact about 20 people once each month to make sure people are going to vote for Clinton and Feingold
 - b. Also, our goal is to sign up 3 people weekly to go beyond the “soft ask” and agree to be Block Captains with significantly enhanced long-term commitment
 - c. **Our goal is to use this election to create lasting year-round organizational infrastructure** with members of YES and Voces de la Frontera Action.
 5. Volunteers work Saturday and/or Sunday
 - a. Sometimes they will work from turf lists, supplementing the work of the paid canvassers
 - b. Some days they will work at places which attract large numbers of Latinos, such as grocery stores, soccer games, festivals
 - c. Some days they will work in Green Bay
 6. Timeline in Green Bay:
 - a. Initial Green Bay training and canvassing on Saturday, Aug. 27.
 - b. Follow-up canvassing each Saturday/Sunday
 - c. We are still in the process of selecting targeted wards for Green Bay.
 7. Engaging Latino voters in Racine, Madison, and Waukesha:
 - a. In partnership with We Are Wisconsin, VFA will have a dedicated statewide organizer to engage new chapter members in the elections.
 - b. For Green Bay and Madison, Voces de la Frontera Action will hire 2 part time canvassers to create campaign structure for volunteers to fold into, that includes canvassing, phone banking, and a limited regional voting program with pledge cards.
 - c. For Racine Walworth County, the statewide organizer will work with local leaders to implement a limited RVP program with pledge cards for the Elections.
 8. Other tactics for Voter Engagement include a robocall, direct calls, a mailing, and public events coordinated with national partners, including: Citizenship Day, Voter Registration Day, Women’s Equality Day, and Early Voting. In addition to organizing a presence to protest Trump visits to state to condemn the politics of hate and division that is the platform of the campaign.

Milwaukee Target Wards

Civil Division	Ward	Total Doors	Total population	Voting age population	Hispanic voting age population	Hispanics as % voting-age population
City Of Milwaukee	215	289	1,592	1,035	539	52%
City Of Milwaukee	216	254	1,493	997	602	60%
City Of Milwaukee	217	428	2,451	1,618	993	61%
City Of Milwaukee	218	504	3,350	2,079	1,413	68%
City Of Milwaukee	219	358	2,306	1,464	929	63%
City Of Milwaukee	220	353	2,047	1,367	896	66%
City Of Milwaukee	221	700	3,772	2,532	1,399	55%
City Of Milwaukee	222	518	2,963	1,919	1,283	67%
City Of Milwaukee	223	443	3,194	2,068	1,431	69%
City Of Milwaukee	224	400	2,914	1,860	1,236	66%
City Of Milwaukee	225	383	2,976	1,811	1,236	68%
City Of Milwaukee	226	210	1,493	969	610	63%
City Of Milwaukee	227	681	2,671	2,025	880	43%
City Of Milwaukee	228	355	2,113	1,422	995	70%
City Of Milwaukee	229	304	2,170	1,378	1,004	73%
City Of Milwaukee	230	589	3,201	2,052	1,443	70%

City Of Milwaukee	231	293	1,939	1,201	898	75%
City Of Milwaukee	232	221	1,860	1,190	927	78%
City Of Milwaukee	233	187	1,365	900	700	78%
City Of Milwaukee	234	251	1,290	852	604	71%
City Of Milwaukee	235	948	1,941	1,680	417	25%
City Of Milwaukee	236	361	2,263	1,528	1,131	74%
City Of Milwaukee	237	524	3,033	1,992	1,465	74%
City Of Milwaukee	238	428	2,831	1,742	1,259	72%
City Of Milwaukee	239	399	2,296	1,506	1,038	69%
City Of Milwaukee	240	468	2,262	1,520	959	63%
City Of Milwaukee	250	294	1,749	1,105	745	67%
City Of Milwaukee	251	197	1,476	893	623	70%
City Of Milwaukee	252	373	2,551	1,665	1,044	63%
City Of Milwaukee	253	174	1,108	730	486	67%
City Of Milwaukee	254	183	1,325	807	560	69%
City Of Milwaukee	255	273	1,407	911	634	70%
City Of Milwaukee	256	245	1,946	1,222	869	71%
City Of Milwaukee	257	477	3,327	2,076	1,427	69%
City Of Milwaukee	258	503	3,119	2,005	1,223	61%

City Of Milwaukee	259	338	1,912	1,273	748	59%
City Of Milwaukee	282	350	1,291	988	281	28%
City Of Milwaukee	283	504	1,938	1,398	489	35%
City Of Milwaukee	284	487	1,722	1,225	555	45%
City Of Milwaukee	285	114	612	385	243	63%
City Of Milwaukee	286	328	1,341	1,025	331	32%
City Of Milwaukee	287	278	1,053	776	252	32%
City Of Milwaukee	288	686	2,349	1,714	499	29%
City Of Milwaukee	289	410	1,867	1,300	575	44%
City Of Milwaukee	290	366	2,255	1,482	921	62%
City Of Milwaukee	291	372	1,898	1,284	726	57%
City Of Milwaukee	292	421	1,485	1,087	353	32%
City Of Milwaukee	317	530	1,578	1,191	189	16%
TOTAL		18,752	101,095	67,249	40,060	60%

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Donald Trump's Rally in Chicago Canceled After Violent Scuffles

By MONICA DAVEY and JULIE BOSMAN MARCH 11, 2016

CHICAGO — With thousands of people already packed into stands and music blaring to warm up the crowd, Donald J. Trump's campaign abruptly canceled his rally here on Friday night over security concerns as protesters clashed with his supporters inside an arena where he was to speak.

Minutes after Mr. Trump was to have taken to a podium on the campus of a large, diverse public university just west of downtown, an announcer suddenly pronounced the event over before it had begun. Hundreds of protesters, who had promised to be a visible presence here and filled several sections of the arena, let out an elated, unstoppable cheer. Mr. Trump's supporters, many of whom had waited hours to see the Republican front-runner, seemed stunned and slowly filed out in anger.

Around the country, protesters have interrupted virtually every Trump rally, but his planned appearance here — in a city run for decades by Democrats and populated by nearly equal thirds of blacks, Latinos and whites — had drawn some particularly

incensed responses since it was announced days ago.

The canceled rally came on a day that Mr. Trump sought to move past the primary fight, saying that the party needed to come together behind him.

Elsewhere, Mr. Trump's security has tried to identify and exclude potential demonstrators before they enter his events, but large groups of protesters had waited in line for seats here, and engaged in tense disputes with Trump supporters even as the University of Illinois at Chicago Pavilion was still filling up. For more than an hour before the event was to begin, security teams led protesters out, one by one, but many more remained, sparring with Trump supporters.

In a statement, Mr. Trump's campaign said that he "has determined that for the safety of all of the tens of thousands of people that have gathered in and around the arena, tonight's rally will be postponed to another date."

"Thank you very much for your attendance and please go in peace," the statement said.

On MSNBC, Mr. Trump said that after meeting with the law enforcement authorities, "I felt it was just safer. I don't want to see anybody get hurt."

Asked about the images of people clashing at the rally, Mr. Trump said, "Honestly, we have a very divided country."

Mr. Trump's opponents, Senator Marco Rubio, Senator Ted Cruz and Gov. John Kasich, condemned the disruptions, but said Mr. Trump was responsible for the tenor of his rallies. Mr. Cruz said Mr. Trump "affirmatively encourages violence."

For hours, the Chicago police, along with university officers, the federal authorities and others, were out here in force. A Chicago police spokesman said that city law enforcement authorities were not consulted and had no role in canceling the event. The spokesman said there had been five arrests, two by the Chicago police, two by the university's police and one by the Illinois State Police. The fire department said three people, including a police officer, were injured.

The prospect of a Trump rally here had long been fraught with apprehension.

This city has been in turmoil over questions of race and policing for months. The release in November of a video of the fatal shooting of Laquan McDonald, a black teenager, by a white Chicago police officer had set off weeks of protest.

The University of Illinois at Chicago draws a significant share of students from Chicago's neighborhoods, and has a large number of international students, and planned protests were publicized on social media. Around 10,000 people had signed up on Facebook to take part in one anti-Trump march. Scores of faculty members had pleaded with administrators over allowing the rally in a letter, which read, in part: "We also request that the university publicly distance itself from the event and make a statement that the Trump rally is an anathema to the mission of U.I.C."

In the hours before the event, inside the 9,500-seat arena, Mr. Trump's backers were energized. Some dressed in outfits to match his, and chanted "Trump! Trump! Trump!" as they waited.

But the situation grew tense as the size of the protest crowd became clear, and as some yelled anti-Trump slogans and skirmished with the supporters. Three men in T-shirts that read, "Muslims United Against Trump," departed early on, delighting the pro-Trump crowd.

Outside, a tense standoff mounted as well. A line stretched for blocks while ticketholders — a diverse mix of older whites wearing Trump gear and younger African-American and Muslim students — waited to be allowed inside. Some said they were devoted Trump fans eager to hear him speak in person. "I believe in Trump absolutely," said Jana Hayek, a Chicagoan and stay-at-home mother, holding the hand of her 12-year-old son, Peter. "I definitely agree with his immigration policy. It's important to control who comes into this country."

A large group opposing Mr. Trump merrily taunted the people entering the stadium with shouts of "Donald Trump has got to go" and signs caricaturing Mr. Trump as a fascist with a Hitler mustache. (In one only-in-Chicago insult, a protester carried a sign reading, "Trump puts ketchup on his hot dog.") And then, suddenly, an announcement declared the event "over" and repeated it several times.

As people streamed out, supporters of Mr. Trump were angry and frustrated.

Anthony Pieroni, 19, a student at the university and a Republican, said he was disappointed. “I understand why people didn’t want him to come here,” he said. “People were fighting, ripping up signs, going crazy. It was just a terrible idea.”

But protesters were jubilant, and celebrated along the intersections on the city’s Near West Side. Some protesters shut down lanes of a nearby expressway.

Arguments and small skirmishes broke out along the streets. At one point, the police rushed in, separating people.

At least one man was hit on the head with a police baton, witnesses said, and blood could be seen coming from a gash on his face. A woman, also bloodied, was led away by police.

“They got the job done,” Vickie Deanda, 54, an accountant from Chicago, said of the demonstrators. “Someone has to object to this hatred. The people inside have a right to be there. But we have a right to be here, too.”

Ashley Parker contributed reporting from Washington, and Liam Stack from New York.

Find out what you need to know about the 2016 presidential race today, and get politics news updates via Facebook, Twitter and the First Draft newsletter.

A version of this article appears in print on March 12, 2016, on page A1 of the New York edition with the headline: Trump Cancels Chicago Rally Amid a Melee .

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<http://blogs.wsj.com/law/2016/09/08/dnc-cuts-ties-with-donald-ducks/>

LAW BLOG

DNC Cuts Ties With ‘Donald Ducks’



PHOTO: EUROPEAN PRESSPHOTO AGENCY

By **JACOB GERSHMAN**

Sep 8, 2016 6:01 pm ET

The Democratic National Committee and “Donald Ducks” have parted ways.

It was three weeks ago when the Donald Trump-taunting mascot made his debut in front of the Trump Tower in Manhattan. DNC said Donald Ducks would trail Mr. Trump on the campaign trail until the GOP nominee releases his federal income-tax returns.

The DNC is no longer associated with the duck, which bears a strong resemblance to Walt Disney’s web-footed character. Americans United for Change is now managing the duck, a consultant for the liberal activist group told Law Blog.

A DNC spokesman wouldn’t say why it cut ties. But the decision could help the political party’s governing body avoid potential legal complications.

Law Blog previously reported that Donald Ducks could pose trademark and copyright issues by running afoul of Disney's intellectual property rights.

The Americans United consultant said Mr. Ducks hasn't croaked but will quack on at Trump events. A Disney spokeswoman wasn't immediately available for comment.

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EXHIBIT E

Published Project Veritas reports describing coordination conduct can be found at:

<https://www.youtube.com/watch?v=5IuJGHuIkzY>

<https://www.youtube.com/watch?v=hDc8PVCvfKs>

Foval: It doesn't matter what the friggin legal and ethics people say, we need to win this motherfucker.

...

PVA: So Hillary is aware of all the work that you guys do I hope?

Creamer: Oh yeah. Yes. (edit) The campaign is fully in it.

PVA: And then they tell Hillary what's going on?

Creamer: I mean Hillary knows through the chain of command what's going on.

...

Creamer: I'm not suggesting we wait around. We need to start this shit right away.

...

Foval: What I call it, is conflict engagement. Conflict engagement in the lines at Trump rallies... We're starting anarchy here. And he needs to understand that we're starting anarchy.

O'Keefe On camera #1: This is part one of "our" undercover investigation into the dark, back room machine of Hillary Clinton's presidential campaign. The culmination of a year-long investigation infiltrating the machine from the bottom all way to the White House. // There are concerns that this election will be rigged.

What you're about to see is going to make you uncomfortable and angry. It's disturbing, graphic and uncensored. Our attorneys say there is strong evidence of criminality.

And this is just part one.

Bumper

On camera #2: There is a narrative...that supporters at Trump rallies are violent and dangerous, looking to beat up protesters who don't agree with them. But our undercover investigation into the Hillary Clinton Democratic Party machine reveals a very different story.

Foval: If you're there and you're protesting and you do these actions, you will be attacked at Trump rallies. That's what we know.

PVA Journalist: So that's part of the process?

Foval: The whole point of it. We know Trump's people will freak the fuck out. His security team will freak out. And his supporters will lose their shit.

VO #1: This is Scott Foval, he is the National Field Director for Americans United for Change. He used to work for People for the American Way, an organization funded by George Soros. He also has his own company called the Foval Group. He is one of the dark operatives for the Clinton campaign.

Foval: We were contracted directly with the DNC and the campaign both.

PVA: Yeah.

Foval: I am contracted to him (Bob Creamer). But I answer to the head of Special Events for the DNC and the head of special events and political for the campaign.

Foval: The (Hillary Clinton) campaign pays DNC, DNC (Democratic National Committee) pays Democracy Partners, Democracy Partners pays the Foval Group, The Foval Group goes and executes the shit...

On camera #3: Democracy Partners is a private political consulting company based in Washington D.C. with deep ties to Hillary Clinton, Obama's White House and the Democratic National Committee.

Foval: We are the primary mechanism as a team. Democracy Partners is the tip of the spear on that stuff.

Creamer: Wherever Trump and Pence are going to be, we have events and we have a whole team across the country that does that both consultants and people from the democratic party. And the democratic party apparatus and the people from the campaign, the Clinton campaign and my role with the campaign, is to manage all that.

VO #2: Bob Creamer is Democracy Partners. He is the husband of Jan Shakowsky, a Democratic congresswoman from Chicago, and in 2005, he plead guilty to tax violations and bank fraud. He was convicted and sentenced to five months in prison and eleven months of house arrest. He founded Democracy Partners in 2011.

Creamer: Just for a little orientation, Democracy Partners is kind of a group practice of a variety of different kinds of political consulting.

Foval: Bob Creamer is diabolical and I love him for it.

On camera #4: This investigation has revealed compelling evidence of a dark money conspiracy, violations of Federal Campaign coordination laws by the Hillary Clinton campaign, Priorities USA (Hillary's super PAC) and the Democratic National Committee.

Foval: We have a clip deliverable that we have to deliver every day for our group of clients who are involved in this project, AUSC, A4C which is Alliance For Change, Alliance for Retired Americas which is part of AFL-CIO. They are one of our partners on the AUFC stuff for Social Security. It depends on the issue. And then there's the DNC and the campaigns and Priorities (Hillary's super pac). Priorities are a big part of this too. The campaigns and DNC cannot go near Priorities, but I guaran-damn-tee you that the people who run the super pacs all talk to each and we and a few other people are the hubs of that communication.

PVA: So you're kind of like intermediaries between the super pacs and the DNC. The DNC, they can't talk to teach other?

Foval: We're consultants so we're not the official [inaudible] so those conversations can be had between consultants who are working for different parties.

PVA: Yeah, okay.

Foval: That's why there's Bob who is the primary there and I'm a sub to him and I'm also a primary to AUFC separately. That's why.

PVA: So there's like a Morse code between the DNC and the super pacs?

Foval: It less of a Morse code then it is a text conversation that never ends. It's like that. It's kind of like an ongoing Pony Express.

PVA: Okay, so I mean that's -

Foval: It's not as efficient as it could be but that's because the law doesn't allow it to.

Foval: The thing that we have to watch, is making sure there is a double blind between the actual campaign and the actual DNC and what we're doing. There's a double blind there. So they can plausibly deny that they knew anything about it.

VO #3: Scott Foval is Creamer's attack dog. Foval and his people train the agitators to go to Trump rallies...and nothing is left to chance.

Foval: There's a script.

PVA: Oh, there is a script?

Foval: There's a script of engagement. Sometimes the crazies bite and sometimes the crazies don't bite.

Foval: They're starting conversations in the line. Right? They're not starting confrontations in the rally. Because once they're inside the rally they're under Secret Service's control. The media will cover it no matter where it happens. The key is initiating the conflict by having leading conversations with people who are naturally psychotic. I mean honestly, it is not hard

to get some of these assholes to pop off. It is a matter of showing up, to want to get into the rally, in Planned Parenthood t-shirts. Or, Trump is a Nazi, you know. You can message to draw them out, and draw them to punch you.

VO #4: Foval boasts about the extent of his network of operatives.

Foval: So here, you have a schedule of events. We update this on an ongoing rolling basis every morning. These are all the Trump and Pence appearances. Tomorrow, for instance, we are turning out five hundred people in front of the Trump International in D.C. We have to have people prepared to go wherever these events are, which means we have to have a central kind of agitator training. Now, we have a built-in group of people in New York who do this. We have a built-in group of people in D.C. who do this. We have a group of people in Vegas. We have a group of people in Colorado. We have a group of people in Minneapolis.

Aaron "Black": Yeah, so I'm basically deputy rapid response director for the DNC for all things Trump on the ground.

VO #5: This guy is Aaron Black, he works full time for Creamer at Democracy Partners. He directs the "spontaneous" protests at Trump and Pence events. His real name is actually Aaron Minter. We don't know why he uses the name Black.

Aaron "Black": Yeah, and nobody is really supposed to know about me.

Aaron "Black": So the Chicago protest when they shut all that, that was us. It was more him (Bob Creamer) than me, but none of this is supposed to come back to us, because we want it coming from people, we don't want it to come from the party. So if we do a protest and its a DNC protest, right away the press is going to say partisan. But if I'm in there coordinating all the troops on the ground and sort of playing the field general but they are the ones talking to the cameras, then its actually people. But if we send out press advisories with DNC on them and Clinton campaign it doesn't have that same effect.

Scott Foval: We have to really careful because, because what we don't need is for it to show up on CNN that the DNC paid for X people to, that's not going to happen.

***Zulema Rodriguez, Activist: So B and I did the Chicago Trump event where we shut down like all the yeah...

VO #6: Zulema Rodriguez and Aaron Black are bragging about a protest last march that turned extremely violent and lead the Trump campaign to cancel a huge rally. Fights broke out between protesters and Trump supporters and two Chicago police officers were injured. Based on our reporting, the event was not spontaneous.

Bob Creamer: We have a call with the campaign every day to go over the focuses that need to be undertaken.

Zulema Rodriguez, Activist: I just had a call with the campaign and the DNC, every day at one o'clock.

VO #7: We met her at the Republican Convention in Cleveland in July.

Zulema Rodriguez, Activist: Oh then, we also did the Arizona one where we shut the highway down.

VO #8: This Clinton dark machine is also prepared for the fallout from the violence they foment at the Trump rallies and other demonstrations.

Foval: Because one thing I'm never going to do is have some kid get punched out a rally and then not have his doctor bill and his legal bill paid, if he gets arrested.

VO #9: Ultimately the whole endeavor is to get negative press of Trump and his supporters in local and national media.

Foval: It is something that Bob and I obsess about is we're not going to go to an effort to just do an event and not have anybody show up or not have it covered. We have to get coverage.

VO #10: These guys have been doing their dirty tricks for some time...even before Trump won the nomination.

PVA: So I probably know your work.

Foval: Oh I know you do. Everybody does.

(Edit)

Foval: You remember the Iowa state fair thing where Scott Walker grabbed the sign out of the dude's hand and then the dude kind of gets roughed up right in front of the stage right there on camera?

PVA: Yeah.

Foval: That was all us. The guy that got roughed up is my counterpart who works for Bob.

PVA: And that was like storyboarded? Him getting roughed up like that?

Foval: We scenarioed it.

PVA: And so you leant yourselves to that situation and it happened. A self-fulfilling prophecy.

Foval: We not only leant ourselves, we planned multiple people in that front area around him and in the back to make sure there wasn't just an accident happen up front, there was also a reaction that happened out back.

VO #11: Remember this woman, her name is Shirley Teeter, she is a sixty-nine-year-old sufferer of COPD...according to numerous news stories at the time, she was "assaulted" at a Trump rally in North Carolina by Trump supporter Richard Campbell. The media played her story across the country for days.

Foval: She was one of our activists. Who had been trained up to birddog. So the term birddogging, you put people in the line, at the front which means that they have to get there at six in the morning because they have to get in front at the rally, so that when Trump comes down the rope line, they're the one asking him the question in front of the reporter, because they're pre-placed there. To funnel that kind of operation, you have to start back with people two weeks ahead of time and train them how to ask questions. You have to train them to birddog, this and this. And they find that guy. And that guy will be like, "Hell yeah, let's do it."

Foval: I'm saying we have mentally ill people, that we pay to do shit, make no mistake. Over the last twenty years, I've paid off a few homeless guys to do some crazy stuff, and I've also taken them for dinner, and I've also made sure they had a hotel, and a shower. And I put them in a program. Like I've done that. But the reality is, a lot of people especially our union guys. A lot of union guys...they'll do whatever you want. They're rock and roll.

When I need to get something done in Arkansas, the first guy I call is the head of the AFL-CIO down there, because he will say, "What do you need?" And I will say, I need a guy who will do this, this and this. And they find that guy. And that guy will be like, Hell yeah, let's do it.

*****On Camera #5: Birddogging...it's a word we had not heard until we got into this investigation. But when we checked the WIKILEAKS Clinton e-mails, we found references to the term in emails to and from the campaign. This is a chain where Clinton campaign manager Robby Mook suggests it might be a tactic to employ to shore up support with Hispanic voters. After our report...they may also need some help with the people in Iowa and Wisconsin.**

Foval: So, I have to be really honest, Iowa is a difficult case because it's a fifty-fifty state and honesty half the state is racist as fuck. I came home last night and really just, I was upset because that's not the way I was raised and that's not the Iowa I grew up in. But you kind of have to accept that that's the way it is.

PVA: It's not who you are, but that's what the state is?

Foval: Right. Wisconsin is just as bad.

PVA: Okay.

“I’m Hillary Clinton and I approve this message.

ON Camera #6: Corruption is alive and well in our country and we’re paying for it. As we continue releasing these stories this week, you must hold the mainstream media to account to report and further investigate what we’ve have uncovered.

We must decide if we’re going to save this country or lose it. to quote Abraham Lincoln, America will never be destroyed from the outside, if we falter and loose our freedoms, it will be because we destroyed ourselves.

---30---

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

Subject:Americans United Proposal

Date:2016-08-26 13:49

From:Robert Creamer <robertcreamers@democracypartners.com>

To:Charles Roth <charles@charlesroth.net>

Cc:Caroline Ciccone <Caroline@auforchange.org>, Brad Woodhouse <brad@correctrecord.org>

Charles -

Great seeing you again last week.

I have attached a modified plan that includes the earned media bus tour we discussed, that will focus on economic and immigration issues, and a voter mobilization program in Milwaukee, WI.

The voter mobilization program will be conducted by Voces de Frontera, the major immigration rights group in the state. It works closely with Scott Foval (who is also National Field Director for Americans United for Change). Americans United for Change will monitor progress of that program and report to you weekly.

There are two overall budgets in this proposal:

One is for a tour of five top priority states and funding for the program in Milwaukee. This budget totals \$200,000 and would allow us to get started on the overall program.

The other, larger budget is supports a tour in 17 states plus funding for the program in Milwaukee. We are continuing to raise funds to support the full program, an effort that will be much easier once the first \$200,000 is committed.

Of course, in addition to your financial support, we would hope that you would work with us on the planning and execution of these efforts.

Attached you will find the Americans United Plan/Proposal. In addition I have attached the overall Voce de Frontera voter mobilization program and budget. You will see that the door to door program in Milwaukee costs approximately \$50,000 - exactly what they are short to fund the entire effort. We are proposing that you fund that portion and, with Scott's help, we monitor its performance.

Hope we can work together on these efforts.

Bob

Robert Creamer

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