

May 10, 2024

Office of General Counsel Federal Election Commission 999 East Street, N.W. Washington, D.C. 20463

Counselor:

Enclosed, please find a citizen's complaint against the named individual for violation of 11 CFR §§109.20-23 and 18 U.S. Code §1341, informing you of the alleged malfeasance.

The Complainant appreciates your attention to this matter in advance.

Respectfully submitted,

Brittany Schneider Williams (VSB #88545)

Schneider & Williams, P.C.

Buth S. William

125 Slusher Street

Stuart, Virginia 24171

P: (276) 694-2455 F: (276) 694-2877

E: britt@swvalawfirm.com

CC: Mr. Austin Shook (via e-mail)

U.S. Attorney's Office, Richmond, VA

File

FEDERAL ELECTION COMMISSION

| In re: Hung Cao for Virginia (FEC ID: C00802488) P.O. Box 652 Purcellville, VA 20134 |) |
|---|---|
| and |) |
| Unleash America PAC (FEC ID: C00831248) P.O. Box 320253 Alexandria, Virginia 22320, |) |
| Respondents, |) |

COMPLAINT

Comes Now, Austin Shook, by counsel, to file this complaint with the Federal Election Commission alleging that **Hung Cao for Virginia Committee**, a candidate campaign committee with FEC ID #C00802488, and Unleash America PAC, an Independent Expenditure Only Committee with FEC ID #C00831248, did violate 18 U.S. Code §1341 by committing mail fraud and wire fraud when Unleash America PAC solicited donations ostensibly for the purpose of supporting state candidates in the Virginia House of Delegates and Virginia Senate races of 2023 but instead converted the money raised for use in his U.S. Senate race in 2024. Cao also violated 11 CFR §§109.20-23 by coordinating expenses between his U.S. Senate campaign and Unleash America PAC in 2023, in preparation for his campaign for U.S. Senate in 2024.

Statement of Facts

1. The Hung Cao for Virginia Committee is a candidate campaign committee with FEC ID #C00802488. (hereinafter referred to as the "candidate").

- 2. The Unleash America PAC is an Independent Expenditure Only Committee with FEC ID #C00831248. (hereinafter referred to as the "Super PAC").
- The candidate originally filed his committee as the Cao for Congress committee on January 26, 2022, in order to run for Congress in Virginia's Tenth Congressional District.
- The candidate filed an amended Statement of Organization June 3, 2023 changing the name of the committee to Hung Cao for Virginia with the intention of running for the U.S. Senate in 2024.
- The Super PAC filed a Statement of Organization on January 12, 2023.
 Count 1 Mail and Wire Fraud (18 U.S. Code §1341)
- 6. The Super PAC sent mail and e-mail solicitations advertising that it was raising money to support Virginia elections for the House of Delegates and Virginia Senate in the 2023 state elections. *See Exhibit A*.
- 7. According to the Year End FEC report filed on January 31, 2024, the Super PAC raised \$148,489.02 in 2023 with the stated intent to support Virginia candidates for election to the House of Delegates and the Virginia Senate. See Exhibit B.
- 8. According to the Mid-Year FEC report filed July 15, 2023 and the Year End FEC report filed January 31, 2024, the Super PAC did not donate a single dollar or expend any money in support of any Virginia candidate committees in 2023. This constituted a fraud in advertising through mail and wire in violation of 18 U.S. Code §1341. See Exhibit C.
- Also, according to the Virginia Public Access Project (www.vpap.org), the Super PAC did not spend any money on Independent Expenditures on behalf of Virginia candidates for the House of Delegates, or Virginia Senate.

Count 2 - Coordination (11 CFR §§109.20-23)

- 10. The Year End FEC report filed January 31, 2024 by the Super PAC shows that the Super PAC made a payment to John Ryan O'Rourke on July 5, 2023. On information and belief, John Ryan O'Rourke is, and functions as, the campaign manager for Hung Cao, both in his failed bid for the U.S. Congress and in his current campaign for the U.S. Senate.
- 11. The Candidate made numerous payments to John Ryan O'Rourke in 2023 recorded in the July Quarterly, October Quarterly and the Year End reports filed in 2023 and 2024.
- 12. The Candidate also repeatedly caused funds to be paid from the Super PAC to his U.S. Senate campaign, Hung Cao for Virginia, for campaign expenditures, among them for mail lists and political consultants aiding his U.S. Senate campaign. See Exhibit A.

Conclusion

- 13. The false advertising as to the purpose of the funds raised by the Super PAC constitutes mail and wire fraud in violation of 18 U.S. Code §1341.
- 14. The payments to Mr. O'Rourke by the Candidate and the Super PAC and to cover expenses incurred by Hung Cao's U.S. Senate campaign, Hung Cao for Virginia, clearly demonstrates coordination between those two entities in violation of 11 CFR §§109.20-23.

WHEREFORE, the Complainant requests the Federal Election Commission investigate and take all appropriate action against Hung Cao for Virginia and the Unleash America PAC for numerous violations of 11 CFR §§109.20-23 and 18 U.S. Code §1341.

Moreover, in light of the evidence of mail and wire fraud, the Complainant respectfully requests that the Federal Election Commission further provide its

investigatory file on this matter to and refer the matter for investigation and further prosecution by, the Fraud Section, Criminal Division, U.S. Department of Justice.

Respectfully submitted,

Buth S. William

Brittany Schneider Williams (VSB# 88545)

Schneider & Williams, P.C.

125 Slusher Street

Stuart, Virginia 24171

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F: (276) 694-2877

E: britt@swvalawfirm.com

Candidate for U.S. Senate in Virginia responds to super PAC allegations, misuse of funds

EXHIBIT A1



ELIZABETH BEYER, USA TODAY NETWORK May 9, 2024 at 6:26 PM

After months of dodging questions, embattled Republican candidate for U.S. Senate Hung Cao addressed allegations that he misrepresented how money raised by the Unleash America super PAC would be spent.

Instead of explaining why the money raised by the super PAC did not go to Virginia Republican candidates for state office in 2023, Cao called the report that prompted the allegations a "hit job" by "the left" on Tuesday's episode of The John Fredericks show, a live conservative radio and T.V. show.

Cao later appeared to say that he used the money raised by Unleash America to "get on Fox, I used that to get on NewsMax talking about national security issues."

Cao said he was "out of the super PAC by May" of 2023. In fact, a memo from his Senate campaign legal counsel said that Cao resigned from the PAC on June 15, 2023.

USA Today had repeatedly emailed, called, and texted Cao's Senate campaign and had emailed the treasurer listed on Unleash America FEC filings since early February to get answers regarding the PAC's expenditures. Aside from a memo sent to USA Today from Cao's campaign through an intermediary, no response was provided.



EXHIBIT A2

Date:

February 14th, 2024

From:

Steve Roberts, Hung Cao for Virginia - General Counsel (Holtzman

Vogel PLLC - Partner)

Subject:

Response to Inquiry Regarding Unleash America PAC

To:

Elizabeth Beyer, USA Today Network - Reporting Fellow (Care Of:

Richard Anderson, Republican Party of Virginia - Chairman)

CC:

John O'Rourke, Hung Cao for Virginia - Campaign Manager; Brittany

Yanick, Hung Cao for Virginia - Communications Director (K2 & Co.)

Elizabeth,

Unleash America PAC is a federally-registered Super PAC, and as such cannot make contributions to any campaign whatsoever. No campaign could possibly have received a contribution from Unleash America PAC, nor could Hung have pledged to make such a contribution.

Hung Cao resigned from Unleash America PAC on Thursday June 15th, 2023 and filed candidacy paperwork for the United States Senate on Thursday July 6th, 2023.

Regards,

Steve Roberts, Hung Cao for Virginia - General Counsel (Holtzman Vogel PLLC -Partner)

INFO@HUNGFORVA.COM | PO Box 652, Purcellville, VA 20134 | PRESS@HUNGFORVA.COM

Hung Cao for Virginia campaign's response to questions regarding Unleash America's lack of contribution to Virginia's 2023 candidates.

How much money was raised by the super PAC and where did it go?

When Cao launched Unleash America in February 2023, the super PAC had one stated goal: To get Republicans elected during Virginia's 2023 statehouse contests

to support Gov. Glenn Youngkin's agenda, as reported by the Staunton News

Leader and USA Today.

EXHIBIT A3

The PAC raised \$103,489 in individual contributions from around the country, which Cao called a "minimal amount" in his Tuesday interview with Fredericks. Cao's principal U.S. Senate campaign committee, Hung Cao for Virginia, contributed \$45,000 to the super PAC, for a total of \$148,489 raised by Unleash America between January and December 2023.

After Republicans lost the House of Delegates in Virginia and failed to flip the Senate, analysis of Unleash America's expenditures showed no support of any kind, in-kind or otherwise, for Virginia's Republican candidates.

In his interview with Fredericks, Cao said, "A lot of the money was reimbursed." However, according to Federal Election Commission filings, money raised by Unleash America was paid to people who worked on Cao's failed 2022 Congressional campaign as well as his current bid for the U.S. Senate.

"Start up costs a lot, you have to have lawyers, you have to have compliance people, you have to have start up fees, so a lot of the money was moved over from the old campaign to keep it alive," Cao told Fredericks on Tuesday, apparently referring to the cost to launch his bid for the U.S. Senate.

About \$12,500 of the money donated to Unleash America was spent on legal fees, according to FEC filings.

Another \$37,514 from the super PAC was paid to John Ryan O'Rourke. O'Rourke is
Cao's 2024 Senate campaign manager and was his campaign manager during his
2022 bid for Congress. In the same year that O'Rourke received payment from
Unleash America, he also received \$96,168 from Hung Cao for Virginia, Cao's
Senate campaign committee.

EXHIBIT A4

Another \$22,867 of Unleash America's money went to K2 & Co., a communications firm Cao had employed during his 2022 Congressional campaign and also during his 2024 Senate campaign. Cao's Senate campaign paid K2 & Co. \$15,000 on October 3, 2023.

The super PAC also paid \$29,403 for list rentals, \$18,576 for digital fundraising, \$6,398 in meeting and lodging expenses as well as bank fees and \$3,904 in earmark fees to WinRed, a fundraising arm of the Republican Party.

Did Cao give any money to Virginia's 2023 candidates? Not through the super PAC.

While FEC filings show that Unleash America did not contribute any of the \$148,489 it raised to Virginia's Republican candidates in 2023, records kept by OpenSecrets and FollowTheMoney.org show that Cao may have contributed roughly \$1,140 to four different candidates in 2023 outside of the super PAC.

Hung Cao for Virginia, Cao's principal Senate campaign committee, donated \$240 to Virginia Sen. Mark Obenshain; \$200 to Lee Peters III, who was a candidate for House of Delegates District 65; and \$200 to Del. Chris Obenshain.

According to FollowTheMoney.org, a person named Hung Cao donated \$500 to Juan Pablo Segura, a candidate for Virginia's 32nd Senate District, though it is unclear if that donor is the Cao currently seeking the Republican nomination for U.S. Senate.

EXHIBIT B1 PAGE 1/59

REPORT OF RECEIPTS

| FORM 3X | For Othe | DISBUI Than An Au | | | | | Office II | lse Only | |
|---|----------------------|--------------------------------------|-------------------------|---------------------------|----------------------------|-------------|----------------------------|--------------------|--|
| NAME OF COMMITTEE (in full) | TYPE OR | PRINT ▼ | | ple: If typi he lines. | ng, type | 12FE | | | |
| UNLEASH AMEF | RIÇA PAC | | | | | | | | لسب |
| | . 20 20 | 4 000050 | | | | | | | |
| ADDRESS (number and st | | C 320253 | | | | | | | |
| Check if differer than previously reported. (ACC) | , ALEXA | NDRIA | 1111 | | | I VA I | 22320 | | |
| 2. FEC IDENTIFICATI | | | TY 🛦 | | | STATE A | | ZIP COI | DE A |
| C C00831248 | | | IS THIS REPORT | | NEW (N) OR | | AMENDED (A) | | |
| 4. TYPE OF REPOR | Re Du | port 🖳 📉 e On: 🛌 | b 20 (M2) ur 20 (M3) | اليكا | May 20 (M5) Jun 20 (M6) | الصحا | Aug 20 (M8) Sep 20 (M9) | | Nov 20 (M11) (Non-Election Year Only) Dec 20 (M12) (Non-Election |
| (a) Quarterly Reports April 15 Quarterly Re | | Ap | r 20 (M4) | | Jul 20 (M7) | | Oct 20 (M10) | | Year Only) Jan 31 (YE) |
| Quarterly Re July 15 Quarterly Re | (C) | 12-Day PRE-Election Report for the: | | rimary (12F | . E | ==4 ==q: | eral (12G) cial (12S) | | Runoff (12R) |
| October 15 Quarterly Re | eport (Q3) | | | | | | | | |
| January 31 Year-End Re | eport (YE) | Elect | on on | M • M] / | B • B / | 7 7 7 | | in the State of | |
| July 31 Mid- Report (Non Year Only) (| -election | 30-Day POST-Election Report for the: | G | eneral (300 | G) [| Run | off (30R) | | Special (30S) |
| Termination (TER) | Report | · | on on | W * W / | / <u> </u> | 7 4 7 V 7 | | in the State of | |
| 5. Covering Period | 07 0 | 1 2023 | | through | 12, | 31 | 20 | 23 | |
| certify that I have exam | Lieker | | f my knowle | edge and I | belief it is tr | ue, correc | t and comple | te. | |
| Type or Print Name of Tr | easurer | | | | | | | | |
| Signature of Treasurer | Lisker, Lisa, , , | | | | | Date [| 01 30 | | 2024 |
| NOTE: Submission of false | e, erroneous, or inc | complete information | on may subje | ect the per | son signing t | his Report | to the penalti | es of 52 | U.S.C. § 30109. |
| Office Use Only | | | | | | | | FORI Rev. 05/20 | |

EXHIBIT B2

SUMMARY PAGE

| OF RECEIPTS AND DISBURSEMENTS FEC Form 3X (Rev. 05/2016) | Page 2 |
|---|-----------------------------------|
| Write or Type Committee Name | |
| UNLEASH AMERICA PAC | |
| Report Covering the Period: From: 07 01 2023 To: 12 | 31 / 2023 |
| COLUMN A This Period | COLUMN B calendar Year-to-Date |
| 5. (a) Cash on Hand January 1, 2023 | 0.00 |
| (b) Cash on Hand at Beginning of Reporting Period | |
| (c) Total Receipts (from Line 19) | 148489.02 |
| (d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B) | 148489.02 |
| 7. Total Disbursements (from Line 31) | 139624.68 |
| 8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d)) | 8864.34 |
| 9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D) | |
| 10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D) | |
| This committee has qualified as a multicandidate committee. (see FEC FORM 1M) | |
| For further information, contact the Federal Election Commission at 800-424-9530 | or visit www.fec.gov |
| | |
| | |
| | |
| | |

DETAILED SUMMARY PAGE

| FEC Form 3X (Rev. 05/2016) | of Receipts | Page 3 |
|--|-------------------------------|-----------------------------------|
| Write or Type Committee Name | | |
| UNLEASH AMERICA PAC | | |
| Report Covering the Period: From: | 07 01 2023 To | 12 31 2023 |
| I. Receipts | COLUMN A Total This Period | COLUMN B Calendar Year-to-Date |
| Contributions (other than loans) From: (a) Individuals/Persons Other Than Political Committees (i) Itemized (use Schedule A) | 2822.00 | 33055.90 |
| (ii) Unitemized(iii) TOTAL (add | 4606.75 | 70433.12 |
| Lines 11(a)(i) and (ii) | 7428.75 | 103489.02 |
| (b) Political Party Committees | 0.00 | 0.00 |
| (c) Other Political Committees (such as PACs)(d) Total Contributions (add Lines | 45000.00 | 45000.00 |
| 11(a)(iii), (b), and (c)) (Carry Totals to Line 33, page 5) 12. Transfers From Affiliated/Other | 52428.75 | 148489.02 |
| Party Committees | 0.00 | 0.00 |
| 13. All Loans Received | 0.00 | 0.00 |
| Loan Repayments Received Offsets To Operating Expenditures | 0.00 | 0.00 |
| (Refunds, Rebates, etc.) (Carry Totals to Line 37, page 5) 16. Refunds of Contributions Made | 0.00 | 0.00 |
| to Federal Candidates and Other Political Committees | 0.00 | 0.00 |
| (Dividends, Interest, etc.) | 0.00 | 0.00 |
| (a) Non-Federal Account (from Schedule H3) | 0.00 | 0.00 |
| (b) Levin Funds (from Schedule H5) | 0.00 | 0.00 |
| (c) Total Transfers (add 18(a) and 18(b)) | 0.00 | 0.00 |
| 19. Total Receipts (add Lines 11(d), 12, 13, 14, 15, 16, 17, and 18(c))▶ | 52428.75 | 148489.02 |
| 20. Total Federal Receipts (subtract Line 18(c) from Line 19) | 52428.75 | 148489.02 |

EXHIBIT B4

DETAILED SUMMARY PAGE

of Disbursements

FEC Form 3X (Rev. 05/2016)

Page 4

| | FEC Form 3X (Rev. 05/2016) | | Page 4 |
|------------|---|--|--|
| | II. Disbursements | COLUMN A Total This Period | COLUMN B Calendar Year-to-Date |
| 1. | Operating Expenditures: (a) Allocated Federal/Non-Federal | Total Tills Follow | Calendar Fear-to-Date |
| | Activity (from Schedule H4) | | |
| | (i) Federal Share | 0.00 | 0.00 |
| | (ii) Non Fodoral Ohara | 0.00 | 0.00 |
| | (ii) Non-Federal Share(b) Other Federal Operating | 0.00 | |
| | Expenditures | 56379.56 | 139624.68 |
| | (c) Total Operating Expenditures | | |
| | (add 21(a)(i), (a)(ii), and (b))▶ | 56379.56 | 139624.68 |
| 2. | Transfers to Affiliated/Other Party | 0.00 | 0.00 |
| 3. | Committees Contributions to | 0.00 | 0.00 |
| | Federal Candidates/Committees and Other Political Committees | 0.00 | 0.00 |
| | Independent Expenditures | | |
| | (use Schedule E) | 0.00 | 0.00 |
| ٠. | (52 U.S.C. § 30116(d)) | 0.00 | |
| | (use Schedule F) | 0.00 | 0.00 |
| 6. | Loan Repayments Made | 0.00 | 0.00 |
| | | | |
| | Loans Made Refunds of Contributions To: | 0.00 | 0.00 |
| ٥. | (a) Individuals/Persons Other | | |
| | Than Political Committees | 0.00 | 0.00 |
| | (b) Political Party Committees | 0.00 | 0.00 |
| | (c) Other Political Committees | | |
| | (such as PACs) | 0.00 | 0.00 |
| | (d) Total Contribution Refunds | | |
| | (add Lines 28(a), (b), and (c))▶ | 0.00 | 0.00 |
| a | Other Dishursements (Including | Comment of the second of the s | Design the second secon |
| 3 . | Other Disbursements (Including Non-Federal Donations) | 0.00 | 0.00 |
| | | | |
| 0. | Federal Election Activity (52 U.S.C. § 30101(| 20)) | |
| | (a) Allocated Federal Election Activity (from Schedule H6) | | |
| | (i) Federal Share | 0.00 | 0.00 |
| | (7 / 525/21 5/12/5 /////////////////////// | | 0.00 |
| | (ii) "Levin" Share | 0.00 | 0.00 |
| | (b) Federal Election Activity Paid | | |
| | Entirely With Federal Funds | 0.00 | 0.00 |
| | (c) Total Federal Election Activity (add Lines 30(a)(i), 30(a)(ii) and 30(b)) | 0.00 | |
| | and oday, oday, and oday, | 0.00 | 0.00 |
| | Total Disbursements (add Lines 21(c), 22, | | |
| - | 23, 24, 25, 26, 27, 28(d), 29 and 30(c)) | 56379.56 | 139624.68 |
| | | | |
| 2. | Total Federal Disbursements | | |
| | (subtract Line 21(a)(ii) and Line 30(a)(ii) from Line 31) | | |
| | non and organization | 56379.56 | 139624.68 |
| | | | |

EXHIBIT B5

DETAILED SUMMARY PAGE

of Disbursements

FEC Form 3X (Rev. 05/2016) III. Net Contributions/

Operating Expenditures

(from Line 11(d), page 3)

(from Line 28(d)).....

(subtract Line 34 from Line 33)

(add Line 21(a)(i) and Line 21(b))▶

(from Line 15, page 3).....

33. Total Contributions (other than loans)

35. Net Contributions (other than loans)

36. Total Federal Operating Expenditures

37. Offsets to Operating Expenditures

38. Net Operating Expenditures

34. Total Contribution Refunds

Page 5 **COLUMN A COLUMN B Total This Period** Calendar Year-to-Date 52428.75 148489.02 0.00 148489.02 52428.75 139624.68 56379.56 0.00 0.00 139624.68 56379.56

REPORT OF RECEIPTS AND DISBURSEMENTS

EXHIBIT C1

| FURM 3X | For Other | Than An Aut | horized Comm | ittee | | Office Use Only | |
|--|--|---------------------------------|-------------------|--------------------|------------------|----------------------|---------------|
| NAME OF COMMITTEE (in f | TYPE OR ull) | PRINT ▼ | Example: If to | | 12FE4M | 5 | |
| UNLEASH AME | RICA PAC | | | | | | 1 |
| | | | | | | | |
| ADDRESS (number and | street) PO BOX | 320253 | | 1111 | | | لببيا |
| Check if different than previous reported. (AC | ly LALEXAN | NDRIA | | | L ^{VA} | 22320 | |
| 2. FEC IDENTIFICA | TION NUMBER | CIT | ſΥ ▲ | | STATE A | ZIP CC | DDE 🛦 |
| C C00831248 | | | S THIS REPORT | NEW (N) OR | O AM | MENDED) | |
| July 15 Quarterly October 1 Quarterly January 3 Year-End July 31 M Report (N | Report (Q1) Report (Q2) SEREPORT (Q3) Report (YE) Aid-Year Ion-election Report (VE) | oort Mar | General (| on (12C) | Sep | in the | Special (30S) |
| 5. Covering Period | 01 0 | | throug | Bearing the same | 30 | 2023 | |
| I certify that I have ex- Type or Print Name of | Lisker, l | and to the best of lisa, , , | my knowledge a | nd belief it is tr | rue, correct an | d complete. | |
| Signature of Treasurer | | | | | Date 07 | 30 | 2023 |
| NOTE: Submission of fa | alse, erroneous, or inc | complete informatio | n may subject the | person signing | this Report to t | T | |
| Use Only | | | | | | FEC FOF Rev. 05/2 | |

EXHIBIT C2

SUMMARY PAGE

OF RECEIPTS AND DISBURSEMENTS FEC Form 3X (Rev. 05/2016) Page 2 Write or Type Committee Name **UNLEASH AMERICA PAC** Report Covering the Period: To: From: **COLUMN A** COLUMN B This Period Calendar Year-to-Date (a) Cash on Hand 0.00 January 1, 2023 (b) Cash on Hand at 0.00 Beginning of Reporting Period..... 96060.27 96060.27 (c) Total Receipts (from Line 19) (d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 96060.27 96060.27 6(a) and 6(c) for Column B) 83245.12 Total Disbursements (from Line 31)...... 83245.12 Cash on Hand at Close of 8. Reporting Period 12815.15 12815.15 (subtract Line 7 from Line 6(d))..... Debts and Obligations Owed TO the Committee (Itemize all on 0.00 Schedule C and/or Schedule D) 10. Debts and Obligations Owed BY the Committee (Itemize all on 0.00 Schedule C and/or Schedule D) This committee has qualified as a multicandidate committee. (see FEC FORM 1M) For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-694-1100

DETAILED SUMMARY PAGE

EXHIBIT C3

of Receipts Page 3 FEC Form 3X (Rev. 05/2016) Write or Type Committee Name **UNLEASH AMERICA PAC** 01 01 2023 30 2023 Report Covering the Period: To: From: COLUMN A **COLUMN B** I. Receipts **Total This Period** Calendar Year-to-Date 11. Contributions (other than loans) From: (a) Individuals/Persons Other Than Political Committees 30233.90 30233.90 (i) Itemized (use Schedule A)..... 65826.37 (ii) Unitemized 65826.37 (iii) TOTAL (add 96060.27 96060.27 Lines 11(a)(i) and (ii)...... 0.00 0.00 (b) Political Party Committees (c) Other Political Committees 0.00 0.00 (such as PACs)..... (d) Total Contributions (add Lines 11(a)(iii), (b), and (c)) (Carry 96060.27 96060.27 Totals to Line 33, page 5)▶ 12. Transfers From Affiliated/Other 0.00 0.00 Party Committees..... 0.00 0.00 13. All Loans Received 0.00 0.00 14. Loan Repayments Received..... 15. Offsets To Operating Expenditures (Refunds, Rebates, etc.) 0.00 0.00 (Carry Totals to Line 37, page 5)..... 16. Refunds of Contributions Made to Federal Candidates and Other Political Committees..... 0.00 0.00 17. Other Federal Receipts (Dividends, Interest, etc.)..... 0.00 0.00 18. Transfers from Non-Federal and Levin Funds (a) Non-Federal Account (from Schedule H3) 0.00 0.00 0.00 0.00 (b) Levin Funds (from Schedule H5) (c) Total Transfers (add 18(a) and 18(b)).. 0.00 0.00 19. Total Receipts (add Lines 11(d), 12, 13, 14, 15, 16, 17, and 18(c))....... 96060.27 96060.27 20. Total Federal Receipts 96060.27 96060.27 (subtract Line 18(c) from Line 19)▶

EXHIBIT C4

DETAILED SUMMARY PAGE

of Disbursements

FEC Form 3X (Rev. 05/2016)

Page 4

| | II. Disbursements | COLUMN A Total This Period | COLUMN B Calendar Year-to-Date |
|-----|--|----------------------------|-----------------------------------|
| 1. | Operating Expenditures: (a) Allocated Federal/Non-Federal | | Odichadi Todi-to Dato |
| , | Activity (from Schedule H4) | | |
| | (i) Federal Share | 0.00 | 0.00 |
| | (ii) Non-Federal Share | 0.00 | 0.00 |
| | (b) Other Federal Operating | | |
| | Expenditures | 83245.12 | 83245.12 |
| | (c) Total Operating Expenditures | 83245.12 | 83245.12 |
| , | (add 21(a)(i), (a)(ii), and (b))▶ Transfers to Affiliated/Other Party | 00240.12 | 00243.12 |
| (| Committees | 0.00 | 0.00 |
| | Contributions to Federal Candidates/Committees | | |
| | and Other Political Committees | 0.00 | 0.00 |
| - | Independent Expenditures (use Schedule E) | 0.00 | 0.00 |
| | Coordinated Party Expenditures (52 U.S.C. § 30116(d)) | | |
| | (use Schedule F) | 0.00 | 0.00 |
| | Loon Benevironte Mede | | |
| . | Loan Repayments Made | 0.00 | 0.00 |
| . 1 | Loans Made | 0.00 | 0.00 |
| . | Refunds of Contributions To: (a) Individuals/Persons Other | | |
| ' | Than Political Committees | 0.00 | 0.00 |
| | | | |
| | (b) Political Party Committees | 0.00 | 0.00 |
| | (c) Other Political Committees (such as PACs) | 0.00 | 0.00 |
| | (d) Total Contribution Refunds | | |
| , | (add Lines 28(a), (b), and (c)) | 0.00 | 0.00 |
| | | | |
| | Other Disbursements (Including | | |
| | Non-Federal Donations) | 0.00 | 0.00 |
| . 1 | Federal Election Activity (52 U.S.C. § 30101(| 20)) | |
| | (a) Allocated Federal Election Activity | | |
| | (from Schedule H6) | | |
| | (i) Federal Share | 0.00 | 0.00 |
| | (ii) "Levin" Share | 0.00 | 0.00 |
| (| (b) Federal Election Activity Paid | 0.00 | 7 7 7 1 7 1 5 T |
| , | Entirely With Federal Funds | 0.00 | 0.00 |
| (| (c) Total Federal Election Activity (add | | |
| | Lines 30(a)(i), 30(a)(ii) and 30(b)) | 0.00 | 0.00 |
| | Total Disbursements (add Lines 21(c), 22, | | |
| | 23, 24, 25, 26, 27, 28(d), 29 and 30(c)) | 92245 12 | 83245.12 |
| | | 83245.12 | |
| | Total Federal Disbursements | | |
| | (subtract Line 21(a)(ii) and Line 30(a)(ii) | | |
| 1 | from Line 31) | 83245.12 | 83245.12 |

EXHIBIT C5

DETAILED SUMMARY PAGE

of Disbursements

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| | FEC FORM 3X (Hev. 05/2016) | rage 3 | | |
|-----|--|-------------------------------|-----|--------------------------------|
| | III. Net Contributions/ Operating Expenditures | COLUMN A Total This Period | Cal | COLUMN B endar Year-to-Date |
| 33. | Total Contributions (other than loans) (from Line 11(d), page 3) | 96060.27 | | 96060,27 |
| 34. | Total Contribution Refunds (from Line 28(d)) | 0.00 | | 0.00 |
| 35. | Net Contributions (other than loans) (subtract Line 34 from Line 33) | 96060.27 | | 96060.27 |
| 36. | Total Federal Operating Expenditures (add Line 21(a)(i) and Line 21(b))▶ | 83245.12 | | 83245.12 |
| 37. | Offsets to Operating Expenditures (from Line 15, page 3) | 0.00 | | 0.00 |
| 38. | Net Operating Expenditures (subtract Line 37 from Line 36) | 83245.12 | V V | 83245.12 |