The Election Denial Industrial Complex: Meet The Individuals Who Have Made A Cottage Industry Out Of Election Challenges

SUMMARY: A number of individuals have personally benefited from promoting election denial and efforts to challenge election results based on unsubstantiated claims, beginning with the 2020 presidential election and most recently the 2022 Arizona gubernatorial election. Those making a cottage industry out of election denial include attorney Kurt Olsen, newly elected Arizona State Senator Jake Hoffman, Former Kansas Attorney General Phill Kline, and "election integrity" activists Catherine Engelbrecht and Gregg Phillips.

- Once a relatively unknown private attorney, Kurt Olsen rose to prominence following the 2020 election as he peddled legal theories that would have seen President Trump remain in office. Since then, Olsen has acted as co-counsel in a number of cases on behalf of 2020 election deniers. In 2021, Olsen, alongside celebrity attorney Alan Dershowtiz, represented a group of Michigan poll challengers who sued Dominion Voting Systems, a voting machine company that has been central to disproven conspiracies concerning the 2020 election. This case was ultimately dismissed. Olsen is also currently representing MyPillow CEO and Trump confidante Mike Lindell in a lawsuit against the federal government after federal agents seized Lindell's cell phone and detained him for questioning in September 2022.
 - More recently Olsen led the charge on behalf of defeated Arizona gubernatorial candidate Kari Lake in her <u>lawsuit</u> attempting to overturn the results of her election loss. Olsen <u>represented Lake in a separate lawsuit</u> that sought to prohibit the use of electronic voting machines in Arizona's 2022 elections. A federal judge dismissed this case in August 2022. The judge then sanctioned Lake and her legal team for filing the suit in the first place. In a blistering opinion, Judge John J. Tuchi wrote that Lake's lawyers had <u>acted "recklessly"</u> and accused them of <u>"furthering false narratives that baselessly undermine public trust at a time of increasing disinformation about, and distrust in, the democratic process." The Lake campaign paid Olsen more than \$187,000 in attorney fees after Lake's election loss, while she was repeating unfounded claims of fraud in her race for governor.
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- Jake Hoffman, a newly elected State-Senator from Arizona, endorsed Kari Lake for governor and continued to support her efforts to challenge her election loss following her defeat to Katie Hobbs. Hoffman is the owner of an LLC that was paid more than \$2 million supporting her campaign. In addition to receiving a significant amount of money from a pro-Lake PAC, Hoffman's company took over a quarter million dollars from Turning Point PAC, a PAC run by Turning Point USA leader Charlie Kirk, including a payment made on election day. Following the gubernatorial election, Kari Lake's campaign paid Hoffman's LLC more than \$270,000 for telemarketing services as Lake continued to advance her claims of election fraud following her loss. Hoffman went on to promote conspiracy theories about Lake's election loss on Kirk's web show and in Reuters, going so far as to call for the results of the election to not be certified and that the election itself should be investigated by the state legislature.
- Former Kansas Attorney General **Phill Kline** made over <u>\$1.4 million</u> in 2020 for consulting work he did with the Thomas More Society, a right-wing law firm that launched "an

aggressive initiative" called the Amistad Project to challenge the 2020 election results. Phill Kline is <u>credited</u> with introducing the idea of the Amistad Project to the Thomas More Society and has served as its director since it was established in August 2020.

• **Catherine Engelbrecht** and **Gregg Phillips**, the leaders of the "election integrity" group True the Vote that has engaged in voter intimidation and election denial, have been accused of personally profiting off their efforts at True the Vote to the tune of hundreds of thousands of dollars, potentially in violation of the law in certain circumstances.

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After Losing The 2022 Arizona Gubernatorial Election, Kari Lake Asked A Judge To Re-Run The 2022 Gubernatorial Election Or Declare Her The Winner.

Lake Filed A Lawsuit On December 9, 2022, Asking Maricopa County Superior Court To Issue An Order "Setting Aside The Certified Result Of The 2022 Arizona Gubernatorial Election And Declaring That Kari Lake Is The Winner" Or Alternatively "Vacating The Certified Results...[And] Requiring That Maricopa County Re-Conduct" The Election. [Complaint in Kari Lake v. Katie Hobbs et al., <u>12/09/22</u>]

f. An order setting aside the certified result of the 2022 Arizona gubernatorial election and declaring that Kari Lake is the winner of the 2022 Arizona gubernatorial election, pursuant to A.R.S. § 16-676;
g. In the alternative, an order vacating the certified results of the 2022 Arizona gubernatorial election, pursuant to A.R.S. § 16-676 or 42 U.S.C. § 1983, and an injunction requiring that Maricopa County re-conduct the gubernatorial election in conformance with all applicable law and excluding all improper votes, under the direction of a special master;

Lake Was Represented By Two Lawyers, Bryan James Blehm And Kurt Olsen.

Bryan James Blehm Is A Lawyer Based In The Phoenix Metro Area Who, According To His Arizona State Bar Biography, Has Focused Much Of His Career On "Technical Motor Vehicle Litigation" And Consumer Protection Cases. "During his tenure at Bowman and Brooke, Mr. Blehm engaged in all aspects of litigation. Although his practice focused on technical motor vehicle litigation, including on and off-road vehicles and motorcycles, Mr. Blehm defended numerous products, including helmets, air conditioners, and pharmaceuticals." [State Bar of Arizona, <u>12/12/22</u>]

Kurt Olsen Is A D.C.-Based Lawyer Who Has Been Admitted To The Case Pro Hac Vice. [Complaint in Kari Lake v. Katie Hobbs et al., 12/09/22]

> Bryan James Blehm, Ariz. Bar No. 023891 Blehm Law PLLC 10869 N. Scottsdale Rd., Suite 103-256 Scottsdale, Arizona 85254 (602) 752-6213 bryan@blehmlegal.com OLSEN LAW, P.C. Kurt Olsen, D.C. Bar No. 445279* 1250 Connecticut Ave., NW, Suite 700 Washington, DC 20036 (202) 408-7025 ko@olsenlawpc.com *to be admitted pro hac vice

Attorneys for Plaintiff-Contestant

Once A Relatively Obscure Lawyer, Olsen Came To Prominence In The Lead-Up To The January 6th Insurrection As He Peddled Bogus Legal Theories That Would Have Kept President Trump In Power.

Olsen Was A "Virtually Unknown" Attorney At The Small New York-based Law Firm Klafter, Olsen & Lesser Before He Helped Texas Attorney General Ken Paxton In His Bid To Have The Supreme Court Intervene On Behalf Of Trump In The 2020 Election. "How did a virtually unknown private attorney and associate of extreme MAGA personalities stumble his way into influencing the functions of the executive branch—to the degree that the most senior DOJ personnel had to concoct plans to fight off his onslaught? For 18 years, Olsen worked as a partner at Klafter, Olsen & Lesser, a small New York-based law firm he co-founded. But shortly after he signed on to help Texas Attorney General Ken Paxton's failed bid to overturn the 2020 election at the Supreme Court, the firm changed its name and registered a new website—without Olsen's name in the URL—on Feb. 24. Now, where Olsen's bio used to be, a disclaimer says, 'Kurt Olsen is not affiliated in any way with Klafter Lesser LLP.'" [The Daily Beast, <u>08/15/21</u>]

• The Supreme Court Ultimately Threw Out Paxton's Case For Lack Of Standing. "Briskly rejecting a long-shot but high-stakes case, the U.S. Supreme Court on Friday tossed out the Texas lawsuit that had become a vehicle for Republicans across the country to contest President-elect Joe Biden's victory..."Texas has not demonstrated a judicially cognizable interest in the manner in which another State conducts its elections," the court wrote in an unsigned ruling Friday evening." [Texas Tribune, <u>12/11/20</u>]

In Late December 2020, Olsen Reached Out To The Department Of Justice, Stating That "The President Directed Me" To Meet With Then Acting Attorney General Jeffrey Rosen To Discuss A New Legal Challenge To The Election Results Brought On By The United States. "I represented Texas in the action filed in the SCT against Pennsylvania et al. Last night the President directed me to meet with AG Rosen today to discuss a similar action to be brought by the United States." [Email to Principal Deputy Solicitor General Jeffrey B. Wall from Kurt Olsen, <u>12/29/20</u>, p. 89]

• Acting Attorney General Rosen Did Not Find Olsen's Argument Persuasive And Never Met With Him In Person. "Olsen never got his meeting with Rosen, and the acting attorney general never took up Texas' quixotic attempt to overturn the election. But, as Politico reported this month, the president's interest in Olsen's work grew so intense that in December, Trump himself made a point of bothering Rosen about the 54-page draft complaint that Olsen had been pushing to the highest levels of the federal government. According to Politico, Rosen recently told Senate investigators that he counseled the then-president that the draft complaint was, at best, a waste of time." [The Daily Beast, <u>08/15/21</u>]

Olsen's Name Also Appeared On A Memo Which Appeared To Suggest That President Trump Should Declare "Martial Law If Necessary" In Order To Remain In Office.

"Furthermore, Olsen's name also appeared on a memo that was hand-delivered to Trump in his very last days in office—a memo that also appeared to include a recommendation on resorting to "martial law if necessary." When pillow magnate and staunch Trump ally Mike Lindell visited the White House to brief Trump and administration officials and attorneys on his wild claims of Chinese hacking efforts in the 2020 election, Olsen's name even appeared in a photo of documents Lindell brought to Trump, next to figures like Sidney Powell and Kash Patel, as suggestions for who Trump should appoint to senior positions during his quest to stay in power." [The Daily Beast, <u>08/15/21</u>]

Following President Trump's Failed Attempt To Overturn The 2020 Election Results, Olsen Remained A Central Figure In MAGA Legal Circles.

Olsen Was Co-Counsel In A Lawsuit Against Dominion Voting Systems, Inc.

In 2021, Olsen And Celebrity Attorney Alan Dershowitz Sued Dominion Voting Systems On Behalf Of A Group Of Michigan Voters Who Said That The Company Had Violated Their First Amendment Rights As Well As The Equal Protection Clause Of The 14th Amendment. "And according to newly filed court documents, that Trumpist attorney, Kurt Olsen, is teaming up with celebrity lawyer Alan Dershowitz, a longtime Democrat who served on former President Trump's legal defense for the 2020 impeachment trial...In a complaint reviewed on Friday, eight poll challengers allege that cease and desist letters sent to them by Dominion as part of the company's defamation lawsuit harmed and damaged the recipients. They allege that Dominion is violating the civil provision of the Racketeer Influenced and Corrupt Organizations Act, engaged in a civil conspiracy, and deprived the litigants of their constitutional rights under the First Amendment and the equal protection clause of the 14th Amendment." [The Daily Beast, <u>10/01/21</u>]

• Dershowitz Served On President Trump's Legal Team During His First Impeachment Trial And Also Counseled Jeffrey Epstein. "Two of the lawyers on President Donald Trump's impeachment defense team have shared another client: Alan Dershowitz and Ken Starr both helped the late hedge fund manager and sex offender Jeffrey Epstein win a lenient sentence for abusing underaged girls." [The Associated Press, 01/24/20]

The Plaintiffs In The Case Had Received Letters From Dominion Demanding That They "Cease And Desist Taking Part In Defaming Dominion" By Promoting Conspiracy Theories Around The Company's Role In The 2020 Election. "The plaintiffs in the case worked as poll challengers in Michigan during the 2020 election. Under Michigan state law, political parties and interest groups are allowed to appoint Michigan residents as "challengers" to question the eligibility of voters and ballots in elections. Each of the plaintiffs says they filled out affidavits with concerns about the voting process in November 2020 and that none of them mentioned Dominion. Nonetheless, the challengers say they still received cease and desist letters. The letters, according to a sample copy attached to the complaint, demanded that the recipients "cease and desist taking part in defaming Dominion" and preserve any documents or communications with the Trump campaign, its attorneys, the media, and anyone who assisted in filling out an affidavit." [The Daily Beast, 10/01/21]

A Federal Judge In Colorado Tossed Out The Plaintiffs' Lawsuit In September 2022 On The Basis That The Cease And Desist Letters Had Not Amounted To Actual Injury. "A federal judge has tossed a lawsuit from multiple Michigan residents against Denver-based Dominion Voting Systems, Inc. after finding the plaintiffs failed to allege any actual injury from the company's efforts to protect itself against defamation...However, last month, U.S. District Court Chief Judge Philip A. Brimmer rejected the notion that the plaintiffs have not plausibly alleged that litigation against them was actual, imminent, or certainly impending when they filed their lawsuit,' Brimmer wrote in a Sept. 22 order. 'Plaintiffs allege only that they feared being sued.'" [Colorado Politics, <u>10/05/22</u>]

Olsen Is Currently Representing Trump Confidante And MyPillow CEO Mike Lindell In His Lawsuit Against The Department Of Justice.

In September 2022, Olsen Filed A Lawsuit Against The United States On Behalf Of MyPillow CEO Mike Lindell. [Lindell v. United States et al., <u>09/20/22]</u>

OLSEN LAW, P.C.

By <u>/s/ Kurt Olsen</u>

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*to be admitted pro hac vice

Counsel for Michael J. Lindell

• Alan Derschowitz Is Serving A Co-Counsel For Lindell. [Lindell v. United States et al., 09/20/22]

ALAN DERSHOWITZ, ESQ. Alan Dershowitz (MA Bar No. 121200)* 1575 Massachusetts Avenue Cambridge, MA 02138

* To be admitted Pro Hac Vice

Of Counsel for Plaintiff Michael J. Lindell

In The Suit, Lindell Claims That The Government Had Violated His Constitutional Rights When Federal Agents Seized His Cell Phone And Detained Him For Questioning. "MyPillow CEO Mike Lindell has filed a lawsuit after, he said, FBI agents seized his cell phone while he was sitting at the drive-thru window of a Hardee's in Mankato, Minn., CBS Minnesota reports. The suit alleges that the federal agents "had no authority to detain and question Mr. Lindell against his will," and that Lindell's First Amendment rights were violated because of 'his efforts to inform the public about alleged fraud and alleged irregularities he believes occurred in order to bring an end to the dependence on computerized voting and tabulating machines in elections.' It also claims authorities were tracking Lindell using location services in violation of his Fourth Amendment rights in the stop and seizure as well as his Fifth Amendment rights to due process and the Sixth Amendment." [CBS News, <u>09/22/22</u>]

• The Federal Agents Did Not Tell Lindell What The Purpose Of The Seizure Was. "'I said, 'Does this have anything to do with January 6th?' Lindell said, referring to investigations led by the U.S. Attorney's Office in Washington, D.C. into the origins of the Capitol riot. 'They said 'no."Lindell said Wednesday that the FBI agents also asked him about various flights he's taken. Lindell said he told them he travels the country meeting with elected officials." [CBS News, <u>09/22/22]</u>

Lindell Is Currently Being Sued By Dominion Voting Systems And Smartmatic For Defamation. "Dominion and Smartmatic, two companies that produce electronic voting machines, are suing Lindell for defamation; his own countersuits against them have been dismissed, as have dozens of other claims of alleged election fraud across the country." [CBS News, <u>09/22/22]</u>

Olsen And Derschowitz Were Sanctioned By A Federal Judge After They Filed A Suit On Behalf Of Kari Lake and Arizona Secretary Of State Candidate Mark Finchem Earlier This Year.

Lake And Finchem Had Sued To Prohibit The Use Of Electronic Voting Machines In The 2022 Elections in Arizona. In May 2022, Olsen And Dershowitz Joined A Group Of Lawyers, Working On Behalf Of Kari Lake And Mark Finchem. [Kari Lake et al. v. Kathleen Hobbs et al., <u>05/04/22</u>]

OLSEN LAW, P.C. By /s/ Kurt Olsen Kurt Olsen (D.C. Bar No. 445279)* 1250 Connecticut Ave., NW, Suite 700 Washington, DC 20036 Telephone: (202) 408-7025 ko@olsenlawpc.com * To be admitted Pro Hac Vice Counsel for Plaintiffs Kari Lake and Mark Finchem By /s/ Alan Dershowitz Alan Dershowitz (MA Bar No. 121200)* 1575 Massachusetts Avenue Cambridge, MA 02138 * To be admitted Pro Hac Vice Of Counsel for Plaintiffs Kari Lake and Mark Finchem

The Pair Had Sued "To Prohibit The Use Of Electronic Voting Machines" During The 2022 Midterm Election. "This is a civil rights action for declaratory and injunctive relief to prohibit the use of electronic voting machines in the State of Arizona in the upcoming 2022 Midterm Election, slated to be held on November 8, 2022 (the "Midterm Election"), unless and until the electronic voting system is made open to the public and subjected to scientific analysis by objective experts to determine whether it is secure from manipulation or intrusion. The machine companies have consistently refused to do this." [Complaint in Kari Lake et al. v. Kathleen Hobbs et al., <u>05/04/22</u>]

<u>A Federal Judge Ruled Against Lake And Finchem And Sanctioned</u> <u>The Pair As Well As Their Lawyers For Their "Frivolous" Lawsuit.</u>

Judge John J. Tuchi Of The United States District Court For The District Of Arizona Dismissed The Case In August. "U.S. District Court Judge John Tuchi dismissed the suit in August, calling it full of "conjectural allegations of potential injuries." [AZCentral, <u>12/01/22</u>]

Tuchi Then Sanctioned Lake And Finchem As Well As Their Legal Team In December 2022 For Failing To Properly Conduct A Factual Inquiry Before Filing Their Lawsuit. "This afternoon a federal judge sanctioned lawyers for failed Arizona gubernatorial candidate Kari Lake, who sued to force the state to use paper ballots in the November election. In point of fact, the state does use paper ballots, something which could have been determined by the plaintiff and her lawyers had they bothered to conduct 'the factual and legal pre-filing inquiry that the circumstances of this case reasonably permitted and required.'" [Above The Law, <u>12/01/22</u>]

- In His Opinion, Tuchi Described The Lawsuit As "Frivolous" And The Plaintiffs' Legal Team As Acting "Recklessly." "The Court further finds that Plaintiffs' counsel acted at least recklessly in unreasonably and vexatiously multiplying the proceedings by seeking a preliminary injunction based on Plaintiffs' frivolous claims..." [Order in Kari Lake et al. v. Kathleen Hobbs et al., <u>12/01/22</u>]
- The Judge Concluded His Opinion By Noting The Danger Inherent In Lawsuits That Would Caste Doubt On The Integrity Of Democratic Elections. "Imposing sanctions in this case is not to ignore the importance of putting in place procedures to ensure that our elections are secure and reliable. It is to make clear that the Court will not condone litigants ignoring the steps that Arizona has already taken toward this end and furthering false narratives that baselessly undermine public trust at a time of increasing disinformation about, and distrust in, the democratic process. It is to send a message to those who might file similarly baseless suits in the future." [Order in Kari Lake et al. v. Kathleen Hobbs et al., <u>12/01/22</u>]

Kari Lake's Campaign Paid Olsen More Than \$187,000 For His Services After Her Loss While She Was Repeating Claims Of Election Fraud.

Lake's Campaign Paid Olsen \$3,314.00 In "Attorney Fees" On December 28, 2022.

Name:	Olsen Law, PC	12/28/2022	\$3,314.00	\$187,068.29
Address:	1250 Connecticut Ave NW, Ste 700, Washington, DC 20036		Cash	
Category:	Professional Services - Attorney fees			

[See The Money, Kari Lake for Arizona, Post-General Election Report, filed on 01/17/23]

Lake's Campaign Then Paid Olsen \$183,754.29 In "Attorney Fees" On December 31, 2022.

Name:	Olsen Law, PC	12/31/2022	\$183,754.29	\$187,068.29
Address:	1250 Connecticut Ave NW, Ste 700, Washington, DC 20036		Cash	
Category:	Professional Services - Attorney fees			

[See The Money, Kari Lake for Arizona, Post-General Election Report, filed on 01/17/23]

Arizona State-Senator Elect Jake Hoffman Demanded That State Officials Not Certify The 2022 Election Results And Has Promised To Investigate Kari Lake's Loss—After He Made More Than \$2 Million Supporting Her Campaign.

Jake Hoffman Is An Arizona State Representative And The Senator-Elect For Arizona State Senate District 15. "Jake Hoffman (Republican Party) is a member of the Arizona House of Representatives, representing District 12. He assumed office on January 11, 2021. His current term ends on January 9, 2023. Hoffman (Republican Party) ran for election to the Arizona State Senate to represent District 15. He won in the general election on November 8, 2022." [Ballotpedia, accessed on 12/19/22]

• Hoffman Is Currently The Vice-Chair Of The Arizona House's Government And Elections Committee.

Committee	
Government & Elections	~
Committee Members	
Member	Position
Reginald Bolding, Jr.	Member
Judy M. Burges	Member
Frank P Carroll	Member
John M. Fillmore	Member
Alma Hernandez	Member
Jake Hoffman	Vice-Chairman

[Arizona State Legislature, accessed on 12/19/22]

Hoffman Currently Chairs The Arizona Freedom Caucus, A Group Of Right-Wing State Legislators That Hoffman Helped Organize In The Summer Of 2022. "Conservative lawmakers at the state Capitol are looking to assert themselves in future legislative sessions with the creation of the Arizona Freedom Caucus, modeled on its federal counterpart in the U.S....A group of GOP lawmakers announced on Friday that "nearly a third" of the 31 Republicans in the state House had founded the Arizona Freedom Caucus. Rep. Jake Hoffman, the caucus' chairman, said their goal is to combat both the left and 'establishment GOP that refuses to answer to the will of the people." [Axios, <u>07/25/22</u>]

An Arizona-Based Company Owned By State Senator-Elect Jake Hoffman Was Paid More Than \$2 Million To Support Kari Lake's Campaign For Governor.

Jake Hoffman Is The Owner And A Principal At 1TEN (Or "110") Management, An Arizona-Based Limited Liability Company Formed In June 2021.

Entity Details							
	Entity Name:	110 MANAGEME	NT, LLC Entity ID:	23234005			
	Entity Type:	Domestic LLC	Entity Status:	Active			
Formation Date: 6/9/2021		Reason for Status:	In Good Stan	ding			
Approval Date: 6/18/2021		6/18/2021	Status Date:	6/9/2021			
Origi	nal Incorporation Date:	6/9/2021	Life Period:	Perpetual			
	Business Type:	Any legal purpose	E Last Annual Report Filed:				
Domicile State: Arizona Annual			Annual Report Due Date:				
			Years Due:				
Original Publish Date:							
Principal	Information						
Title	Name	Attention	Address	Date of Taking Office	Last Updated		
Manager	Jake Hoffman		20528 E Sunset Ct, QUEEN CREEK, AZ, 85142, Maricopa County, USA	6/8/2021	6/18/2021		
Manager	Kimberly Hoffman		20528 E Sunset Ct, QUEEN CREEK, AZ, 85142, Maricopa County, USA	6/8/2021	6/18/2021		
Member	414 Legacy Trust dated June 8, 2021		20528 E Sunset Ct, QUEEN CREEK, AZ, 85142, Maricopa County, USA	6/8/2021	6/18/2021		

[Arizona Corporation Commission, accessed <u>12/19/22</u>]

In 2022 Alone, Turning Point PAC Inc. Paid 1TEN LLC More Than A Quarter Million Dollars.

Turning Point PAC Paid 1TEN LLC \$256,517.91 For "Media" And "Text Services" In Non-Federal Races Between July And September 2022.

Spender	Recipient	State	Description	Disbursement T date	Amount –
TURNING POINT PAC INC.	1TEN LLC	AZ	NON FED MEDIA	09/15/2022	\$203,769.00
TURNING POINT PAC INC.	1TEN LLC	AZ	NON FED TEXT SERVICES	08/02/2022	\$5,195.90
TURNING POINT PAC INC.	1TEN LLC	AZ	NON-FED TEXT SERVICES	07/27/2022	\$1,969.01
TURNING POINT PAC INC.	1TEN LLC	AZ	NON-FED TEXT SERVICES	07/27/2022	\$22,835.10
TURNING POINT PAC INC.	1TEN LLC	AZ	NON-FED TEXT SERVICES	07/27/2022	\$22,748.90

[Federal Election Commission, accessed on 12/16/22]

• Campaign Finance Reports Filed With The State Of Arizona Show That Turning Point PAC Paid 1TEN LLC Specifically To Oppose Katie Hobbs, Kari Lake's Opponent.

0	9/15/2022	Turning Point Pac		\$203,769.00	Ind. Expend. (Non-R	ecall) - cash	1Ten,
I	Fransaction De	tails					
File	r ld:		Filer Name:			Filed On Report:	
	183		Turning Point F	PAC		PDF	
	nsaction Date: 15/2022		Amount: \$203,769.00			Transaction Type Ind. Expend. (Nor	
	egory: nmunications		Sub-Category Advertising	:			
Red 1Te	ceived From Or	Paid To:					
	d ress: 51 E Queen Cre	eek Rd, STE 105-503, Queen Cree	ek, AZ 85142				
Ind	ependent Expe	enditure Benefits or Opposes Ca	ndidate				
	ndidate Commi ct Katie Hobbs	ittee:					
	dress: benix, AZ 85004						
	nefits or Oppos	ies:					

[See The Money, accessed on 12/16/22]

Turning Point PAC's Last Publicly Disclosed Disbursement To 1TEN LLC Was A \$50,000 Payment Made On Election Day.

Disbursement To	Address	Election Type	Date of Disbursement	Extra Description	Amount This Text Period	Memo
1TEN LLC	18521 E QUEEN CREEK RD STE 105-503 QUEEN CREEK, Arizona 85142		11/08/2022	DIGITAL MEDIA	50000.00	

[Turning Point PAC Inc., Post-General 2022 Report, filed on <u>12/08/22</u>]

Put Arizona First, A State Political Action Committee Supporting Kari Lake's Candidacy, Paid 1TEN LLC More Than \$2.1 Million To Support Kari Lake's Candidacy.

In May and June Alone, Put Arizona First Reported Paying 1TEN LLC \$2,163,900.00 For A Variety Of Media And Communications Products To Support Kari Lake And Oppose Karrin Taloy Robson, Her Opponent In The Republican Primary.

101075 Put Ar				y Post-Election (C
	rizona Secretary of State		Covers 05/0	1/2022 to 06/30/20
Schedule I	E2a - Independent expenditures	Date	Amount	Cycle To Date
Name:	1Ten	05/13/2022	\$287,886.29	\$2,139,900.00
Address:	18251 E Queen Creek Rd, STE 105-503, Queen Creek, AZ 85142		Cash	
Trans. Type:	Independent Expenditure - Pay Cash/Check			
Category:	Communications - TV			
Memo:	Broadcast & Cable Ad Buy			
Opposes:	100592 - Karrin for Arizona			
Name:	1Ten	05/13/2022	\$20,000.00 Cash	\$2,139,900.0
Address:	18251 E Queen Creek Rd, STE 105-503, Queen Creek, AZ 85142		Cash	
Trans. Type:	Independent Expenditure - Pay Cash/Check			
Category:	Communications - Other			
Memo:	Peer-to-Peer Texting			
Opposes:	100592 - Karrin for Arizona		00.074.70	
Name:	1Ten	05/13/2022	\$3,374.70 Cash	\$2,139,900.0
Address:	18251 E Queen Creek Rd, STE 105-503, Queen Creek, AZ 85142		Cash	
Trans. Type:	Independent Expenditure - Pay Cash/Check			
Category:	Communications - Production cost			
Memo:	Microsite Production & Updates			
Opposes: Name:	100592 - Karrin for Arizona	05/43/2022	£00 700 04	80 400 000 0
	1Ten	05/13/2022	\$88,739.01 Cash	\$2,139,900.0
Address:	18251 E Queen Creek Rd, STE 105-503, Queen Creek, AZ 85142		Casil	
Trans. Type:	Independent Expenditure - Pay Cash/Check Communications - TV			
Category: Memo:	Display, Video, OTT + CTV Ad Buy			
Memo: Opposes:	100592 - Karrin for Arizona			
Name:	1Ten	06/10/2022	\$6,000.00	\$2,139,900.0
Address:	18251 E Queen Creek Rd, STE 105-503, Queen Creek, AZ 85142	00/10/2022	Cash	92,100,000.00
Trans. Type:	Independent Expenditure - Pay Cash/Check			
Category:	Communications - Advertising			
Benefits:	100605 - Kari Lake for Arizona			
Name:	1Ten	06/10/2022	\$24,000.00	\$24,000.0
Address:	18251 E Queen Creek Rd, STE 105-503, Queen Creek, AZ 85142	00.10/2022	Cash	424,000.00
Trans. Type:	Independent Expenditure - Pay Cash/Check			
Category:	Communications - Other			
Memo:	Peer-to-Peer Texting			
Benefits:	100605 - Kari Lake for Arizona			
Name:	1Ten	06/10/2022	\$114,000.00	\$2,139,900.0
Address:	18251 E Queen Creek Rd, STE 105-503, Queen Creek, AZ 85142		Cash	
Trans. Type:	Independent Expenditure - Pay Cash/Check			
Category:	Communications - Advertising			
Memo:	Display + Video + PPC Ad Buy			
Benefits:	100605 - Kari Lake for Arizona	1 1		

[Put Arizona First, 2022 May Post-Election (Q2) Campaign Finance Report, filed on 07/15/22]

Put Arizona First Reported That Contributions To The PAC, Totaling \$2.1 Million, Came From A Company Called SPH Medical LLC, An Apparent Alias. "In its campaign finance forms, Put Arizona First lists its address as a UPS Store in north Phoenix. Put Arizona First said on its campaign disclosure forms that its only financial contributions, totaling \$2.1 million, came from a company called SPH Medical LLC. But the owner of a medical supply company with that name based in Orange County denies making that donation, or any political donation anywhere." [AZCentral, <u>07/19/22</u>]

As Of December 16, 2022, Put Arizona First Has Racked Up More Than \$1,000 In Fines For Not Filing Their Campaign Finance Reports On Time.

CSV Print Column visibility								
	Page 1 V of 1							
Report Due Date	$ \bigcirc $ Date Filed $ \bigcirc $	🛓 Report Name 🗘	📥 Report Filings 🛛 🗘	In Status In Status				
	07/19/2022	2022 - CCEC Primary Tuesday Trigger	PDF	Trigger Report				
	07/12/2022	2022 - CCEC Primary Tuesday Trigger	PDF	Trigger Report				
	06/28/2022	2022 - CCEC Primary Tuesday Trigger	PDF	Trigger Report				
	06/21/2022	2022 - CCEC Primary Tuesday Trigger	PDF	Trigger Report				
	06/02/2022	2022 - CCEC Primary Monthly Trigger	PDF	Trigger Report				
05/07/2022	05/10/2022	2022 - May Pre-Election	PDF	3 Day(s) Late Fines Due \$30.00				
07/15/2022	07/15/2022	2022 - May Post-Election (Q2)	PDF	On Time				
07/23/2022	07/22/2022	2022 - Pre-Primary Election	PDF	On Time				
10/15/2022	10/11/2022	2022 - Post-Primary Election (Q3)	PDF	On Time				
10/29/2022		2022 - Pre-General Election		48 Day(s) Late Fines Due \$975.00				
Showing 1 to 10 of 10 entries				Page 1 v of 1				

[See The Money, Put Arizona First, accessed on 12/16/22]

Kari Lake's Campaign Committee Paid Hoffman's Company \$135,000 The Day Before The 2022 Election.

Kari Lake's Campaign Paid Hoffman's Company 1TEN \$135,611.28 For "Telemarketing/Auto Dialers" Services On November 7, 2022.

	· · · · · · · · · · · · · · · · · · ·			
Name:	1Ten	11/07/2022	\$135,611.28	\$135,611.28
Address:	18251 E Queen Creek Rd, STE 105-503, Queen Creek, AZ 85142		Cash	
Category:	Professional Services - Telemarketing/auto dialers			
-				

[See The Money, Kari Lake for Arizona, Post-General Election Report, filed on 01/17/23]

Since Kari Lake Lost Her Election, Hoffman, Who Endorsed Lake, Alleged Rampant Voter Disenfranchisement In Maricopa County And Promised To Investigate The Election.

Hoffman Endorsed Kari Lake For Governor In June 2022.



[Twitter, 06/29/22]

After Lake's Defeat In The November Election, Hoffman Argued That Arizona Should Not Certify The Results Of The 2022 Gubernatorial Election.

On November 23, 2022, Hoffman Appeared On Charlie Kirk's Podcast, The Charlie Kirk Show, And Said That Arizona Should Not Certify The Election Results. "There is no question in my mind that [the election] should be certified by [Arizona governor] Doug Ducey, and it should not be certified by Katie Hobbs." [The Charlie Kirk Show, at 02:45, <u>11/23/22]</u>

• Hoffman Alleged, Without Any Proof, That "Tens Of Thousands Of Voters" In Maricopa County Were Disenfranchised During The Election. "Tens of thousands of voters were directly disenfranchised, and millions of voters were disenfranchised by extension." [The Charlie Kirk Show, at 03:05, <u>11/23/22</u>]

- Charlie Kirk Is The Founder And President Of Turning Point USA. "Charlie Kirk is the Founder and President of Turning Point USA, a national student movement dedicated to identifying, organizing, and empowering young people to promote the principles of free markets and limited government." [Turning Point USA, <u>12/19/22</u>]
- Turning Point PAC, Which is Turning Point USA's PAC Run By Kirk, Paid Hoffman's Firm 1TEN LLC \$256,517.91 For "Media" And "Text Services" In Non-Federal Races Between July And September 2022.

Spender	Recipient	State	Description	Disbursement T date	Amount –
TURNING POINT PAC INC.	1TEN LLC	AZ	NON FED MEDIA	09/15/2022	\$203,769.00
TURNING POINT PAC INC.	1TEN LLC	AZ	NON FED TEXT SERVICES	08/02/2022	\$5,195.90
TURNING POINT PAC INC.	1TEN LLC	AZ	NON-FED TEXT SERVICES	07/27/2022	\$1,969.01
TURNING POINT PAC INC.	1TEN LLC	AZ	NON-FED TEXT SERVICES	07/27/2022	\$22,835.10
TURNING POINT PAC INC.	ITEN LLC	AZ	NON-FED TEXT SERVICES	07/27/2022	\$22,748.90

[Federal Election Commission, accessed on 12/16/22]

Hoffman Repeated The Call To Not Certify Arizona Gubernatorial Election Results In An Interview With Reuters, A Transcript Of Which Was Shared Publicly Via A Kari Lake-Linked Twitter Account. "What steps should be taken now to stop the certification of the election? The Attorney General has outlined a litany of alleged violations of Arizona election law at the hands of Maricopa County, and the people of this state deserve nothing less than full cooperation by county officials in the Attorney General's investigation into the cause and scope of voter disenfranchisement stemming from those violations." [Twitter, <u>11/28/22</u>]

Hoffman Has Also Called For Investigations Into The Election's Administration When The State Legislature Reconvenes.

Hoffman Told Reuters In November 2022 That Members Of The Arizona Freedom Caucus Would Lead "Legislative Oversight And Investigation Efforts" Into The Election When The Body Reconvenes In January 2023. "Ensuring maximum voter confidence in the impartiality of our elections process isn't a partisan issue—it is a civil rights issue, which is why members of the Arizona Freedom Caucus will be leading the legislative oversight and investigation efforts into what has occurred when the legislature reconvenes in January." [Twitter, <u>11/28/22</u>]

As Hoffman Contested Kari Lake's Election Loss, The Lake Campaign Continued To Make Payments To His Company 1TEN.

The Lake Campaign Paid Hoffman's Firm More Than A Quarter Million Dollars After Lake's Election Loss.

On November 14, 2022, The Lake Campaign Reported Paying Hoffman's Company 1TEN \$270,897.11.

	-			
Name:	1Ten	11/14/2022	\$270,897.11	\$270,897.11
Address:	18251 E Queen Creek Rd, STE 105-503, Queen Creek, AZ 85142		Cash	
Category:	Professional Services - Telemarketing/auto dialers			

Former Kansas Attorney General Phill Kline Has Made \$1.4 Million Pushing The Big Lie Through The Amistad Project

The Amistad Project Bills Itself As An "Election Integrity" Watchdog, Yet It Attempted To Interfere With Election Procedures In 2020.

The Amistad Project Bills Itself As "The Nation's Leading Election Integrity Watchdog" That Is Active In "Litigation Against The Left's Shadow Government." [The Amistad Project, accessed <u>01/10/23</u>]

The Amistad Project Is A Project Of The Thomas More Society That Worked With Rudy Giuliani And Other Trump Associates To Challenge 2020 Election Results. "Central in the effort was a group called the Amistad Project, a wing of the Thomas More Society, a Chicago-based conservative legal organization. In the wake of the election, the Amistad Project worked closely with Rudolph W. Giuliani and other members of Mr. Trump's legal team to file lawsuits challenging the vote results in key swing states." [New York Times, <u>01/21/22</u>]

Former Kansas Attorney General Phill Kline Was Paid Over \$1.4 Million For Leading The Amistad Project's Efforts To Overturn The 2020 Election.

In 2020, The Thomas More Society Paid Phill Kline Over \$1.4 Million For Consulting Work Through An LLC Kline Established Early That Year.

The Thomas More Society Paid Phill Kline \$1,457,150 In Consulting Fees Through The Amistad Journey LLC.

Section B. Independent	Contractors							
1 Complete this table t	1 Complete this table for your five highest compensated independent contractors that received more than \$100,000 of							
compensation from t	compensation from the organization. Report compensation for the calendar year ending with or within the organization's tax year.							
	(A) Name and business address	(B) Description of services	(C) Compensation					
PHILLIP KLINE,	PHILLIP KLINE, AMISTAD JOURNEY, LLC 115 SANDIDGES ROAD							
AMHERST	VA 24521	CONSULTING	1,457,150					

[The Thomas More Society 2020 990, Page 8]

The Amistad Journey, LLC Was Registered With The Virginia State Corporation Commission On January 10, 2020.

Entity Information			
Entity Name:	The Amistad Journey, L.L.C.	Entity ID:	11001271
Entity Type:	Limited Liability Company	Entity Status:	Active
Series LLC:	No	Reason for Status:	Active
Formation Date:	01/10/2020	Status Date:	03/25/2022
VA Qualification Date:	01/10/2020	Period of Duration:	Perpetual
Industry Code:	0 - General	Annual Report Due Date:	N/A
Jurisdiction	VA	Charter Fee:	N/A
Registration Fee Due Date:	01/31/2023		

[Virginia State Corporation Commission, Accessed 12/14/22]

The Registered Agent Of The Amistad Journey, LLC Is Phillip Kline.

Registered Agent Information

RA Type: Individual

RA Qualification: Member or Manager of the Limited Liability Company

Name: Phillip Kline

[Virginia State Corporation Commission, Accessed 12/14/22]

Phill Kline's Residential Address Is The Same As The Business Address For The Amistad Journey LLC.

• The Amistad Journey, LLC Was Registered With The Virginia State Corporation Commission At 115 Sandidges Rd In Amherst, Virginia.

Locality: AMHERST COUNTY

Registered Office Address: 115 Sandidges Rd, Amherst, VA, 24521, USA

[Virginia State Corporation Commission, Accessed 12/14/22]

• Phill Kline Owns The Residential Property At 115 Sandidges Rd In Amherst, Virginia.

Ownership Information	
Owner: KLINE PHILLIP D & DEBORAH SHATTUCK-	Owner2: KLINE
Mailing Address: 115 SANDIDGES RD	Property Address: 115 SANDIDGES RD
AMHERST, VA 24521	N/A
Assessed Value	
Year: 1/1/2020	Assessment Total: \$285,200
Land Use Assessment: N/A	Assessment Land: \$34,700
Total Minerals: 0 0	Assessment Improvements: \$250,500
Land Assessment Information	
Acreage: 2.933	DB Ref: 1131 756
Class: Single Family Residential - Suburban	WB Ref: 0
	ative Office, Accessed 12/14/2

Phill Kline Is The Founder And Director Of The Thomas More Society's Amistad Project.

• The Amistad Project's Website Lists Phill Kline As Its Founder.



[AmistadProject.org, Accessed <u>12/14/22</u>]

• Phill Kline's Twitter Biography Identifies Him As The Director Of The Amistad Project.



[Phill Kline's Twitter, Accessed 12/14/22]

Phill Kline Is The Sole Employee Listed On The Amistad Project's Website. The only person listed on the "Who We Are" page of the Amistad Project's website is its founder, Phill Kline. [AmistadProject.org, Accessed <u>12/14/22</u>]

The Amistad Project Was "Central In The Effort" To Overturn The Will Of Voters By Sending Illegitimate, Pro-Trump Electors To The Michigan Legislature.

The New York Times Said The Amistad Project Was "Central In The Effort" To "Empower Mr. Trump's Allies In Congress To Hand Him The Election." "At the heart of the plan was an effort to empower Mr. Trump's allies in Congress to hand him the election. Under the Constitution, if the Electoral College deadlocks or if no candidate receives a majority of its votes, the House of Representatives decides the victor. Each state delegation casts a single vote in these so-called 'contingent elections.' Under that scenario, Mr. Trump would almost certainly have won. Central in the effort was a group called the Amistad Project, a wing of the Thomas More Society, a Chicago-based conservative legal organization. In the wake of the election, the Amistad Project worked closely with Rudolph W. Giuliani and other members of Mr. Trump's legal team to file lawsuits challenging the vote results in key swing states." [The New York Times, <u>01/21/22</u>]

- The Amistad Project's Plan Was To Replace Enough Biden Votes In The Electoral College With Trump Votes To Force The Decision To Go To The Republican-Controlled House Of Representatives. "At the heart of the plan was an effort to empower Mr. Trump's allies in Congress to hand him the election. Under the Constitution, if the Electoral College deadlocks or if no candidate receives a majority of its votes, the House of Representatives decides the victor. Each state delegation casts a single vote in these so-called 'contingent elections.' Under that scenario, Mr. Trump would almost certainly have won." [The New York Times, <u>01/21/22</u>]
- The Amistad Project's Plan To Replace Biden Electors In Michigan Would Have Created A Scenario Where "Trump Would Almost Certainly Have Won." "At the heart of the plan was an effort to empower Mr. Trump's allies in Congress to hand him the election. Under the Constitution, if the Electoral College deadlocks or if no candidate receives a majority of its votes, the House of Representatives decides the victor. Each

state delegation casts a single vote in these so-called 'contingent elections.' Under that scenario, Mr. Trump would almost certainly have won. Central in the effort was a group called the Amistad Project, a wing of the Thomas More Society, a Chicago-based conservative legal organization. In the wake of the election, the Amistad Project worked closely with Rudolph W. Giuliani and other members of Mr. Trump's legal team to file lawsuits challenging the vote results in key swing states." [The New York Times, 01/21/22]

December 14, 2020: As Members Of The Electoral College Prepared To Certify Electors In All 50 States, Amistad Project Attorney Ian Northon "Tried To Deliver A False Slate Of **Pro-Trump Electors To The Michigan Legislature.**" "On Dec. 14, as the members of the Electoral College were set to meet and certify electors in all 50 states, Ian Northon, a lawyer for Amistad Project, tried to deliver a false slate of pro-Trump electors to the Michigan Legislature in Lansing, but was turned away by state troopers." [The New York Times, <u>01/21/22</u>]

- Amistad Lawyer Ian Northon Was Turned Away By State Troopers And Failed To Deliver The List Of Fake Electors. "On Dec. 14, as the members of the Electoral College were set to meet and certify electors in all 50 states, Ian Northon, a lawyer for Amistad Project, tried to deliver a false slate of pro-Trump electors to the Michigan Legislature in Lansing, but was turned away by state troopers." [The New York Times, 01/21/22]
- Meanwhile, Phill Kline Promoted The Group's Fake Elector Plan On Right-Wing Media Outlets. "On Dec. 14, as the members of the Electoral College were set to meet and certify electors in all 50 states, Ian Northon, a lawyer for Amistad Project, tried to deliver a false slate of pro-Trump electors to the Michigan Legislature in Lansing, but was turned away by state troopers. That same day, the Amistad Project's director, Phill Kline, fanned across right-wing media outlets promoting the fake elector plan. On a podcast run by Stephen K. Bannon, a former adviser to Mr. Trump, Mr. Kline declared that only state lawmakers had the power to decide who should be electors, 'not governors or local election officials or even the Congress of the United States.' Mr. Kline also appeared on One America News, the conservative television network, saying that if dueling slates of electors cast doubt on the results of the election, then the House of Representatives would get to decide who won and that would lead to a victory for Mr. Trump." [The New York Times, <u>01/21/22</u>]

Amistad Project Founder And Director Phill Kline Has Been Barred From Practicing Law In His Home State Of Kansas For Nearly A Decade.

Phill Kline's Law License Was Suspended Indefinitely In 2013, When The Kansas Supreme Court Found He Violated Rules Of Misconduct Nearly A Dozen Times.

The Kansas Supreme Court Suspended Phill Kline's Law License Indefinitely In 2013 After Finding That He "Had Committed 11 Violations Of The Kansas Rules Of Professional Conduct In Connection With His Investigations Of Abortion Providers." "Kline's law license was indefinitely suspended by the Kansas Supreme Court in 2013 after it found he had committed 11 violations of the Kansas Rules of Professional Conduct in connection with his investigations of abortion providers." [KCUR, <u>01/24/22</u>]

- The Thomas More Society Represented Kline When He Challenged The Indefinite Suspension Of His Law License. "Kline was previously represented by the Thomas More Society when he tried to overturn the indefinite suspension of his law license by the Kansas Supreme Court, which ruled in 2013 that Kline violated rules governing lawyers' conduct while pursuing investigations of abortion providers as a prosecutor." [The Washington Post, <u>12/07/20</u>]
- A Federal Judge Dismissed Kline's 2015 Lawsuit Against The Justices Who Suspended His License, and The Supreme Court Declined To Hear Kline's Appeal. "Kline's law license was indefinitely suspended by the Kansas Supreme Court in 2013 after it found he had committed 11 violations of the Kansas Rules of Professional Conduct in connection with his investigations of abortion providers. In 2015, Kline sued the justices who suspended his license, but a federal judge dismissed the suit in 2016. The U.S. Supreme Court later declined to review the case." [KCUR, 01/24/22]

After Losing His Law License, Phill Kline Became A Professor At Liberty University, A Christian College In Virginia That Was Formerly Led By Trump Ally And Zealot Jerry Falwell Jr. "In August this year, it launched the Amistad Project under the leadership of Phillip Kline, a former Kansas attorney general who is now a professor at Liberty University, a conservative Christian college in Lynchburg, Va., led until this year by Trump ally Jerry Falwell Jr." [The Washington Post, <u>12/07/20]</u>

The Amistad Project Received \$1,035,000 From Right-Wing Dark Money Conduit DonorsTrust Between 2020 And 2021.

2020: DonorsTrust Gave \$1,010,000 To The Thomas More Society Though Two Separate Contributions That Were Both Earmarked "For The Amistad Project."

Thomas More Society 309 W. Washington Street Suite 125							
Chicago, IL 60606	36-4270023	501(c)(3)	1,000,000.	٥.	N/A	N/A	for the Amistad project
Thomas More Society 309 W. Washington Street Suite 125 Chicago, IL 60606	1	501(c)(3)	10,000.	٥.	N/A	я/а	for the Amistad Project

[2020 DonorsTrust Form 990, Page 108, 11/15/21]

2021: DonorsTrust Gave The Thomas More Society \$250,000 For The Amistad Project.

Thomas More Society							
309 W. Washington Street Suite 125							
Chicago, IL 60606	36-4270023	501(c)(3)	250,500.	٥.	N/A	N/A	for Amistad Project

[2021 DonorsTrust Form 990, Page 100]

True The Vote Leaders Catherine Engelbrecht And Gregg Phillips Personally Enriched Themselves To The Tune Of Hundreds Of Thousands Of Dollars Through Their Election Denial And Voter Suppression Efforts

True The Vote Is A Right-Wing Group Founded By Catherine Engelbrecht That Engaged In Conspiracies About The 2020 Election As Well As Voter Suppression And Intimidation.

<u>True The Vote Was Founded By Influential 'Election Integrity' Leader</u> <u>Catherine Englebrecht.</u>

True The Vote Is A Texas-Based Nonprofit Organization Founded In 2009 By Tea Party Activist Catherine Engelbrecht. "In 2009, Ms. Engelbrecht created the nonprofit King Street Patriots, named after the site of the 1770 Boston Massacre, which fueled colonial tensions that would erupt again with the Tea Party uprising three years later. She also formed True the Vote. The idea behind the nonprofits was to promote "freedom, capitalism, American exceptionalism," according to a tax filing, and to train poll watchers." [New York Times, <u>9/24/22</u>]

Key Stop The Steal Organizer And January 6th Organizer Ali Alexander Called Engelbrecht "The Godmother Of The Election Integrity Movement." [Media Matters, 8/11/22]

Right-Wing Figures And Activists Have Been Accused Of Using The Guise Of 'Election Integrity' To Enact Voter Suppression. "Republicans, who have largely embraced former President Donald Trump's false claims of fraud in the 2020 election, say the measures are necessary to ensure election integrity. Democrats say they are aimed at making it harder for voters who traditionally back the Democratic Party to cast their votes." [Retuers, <u>11/01/22</u>]

<u>True The Vote Has Been Accused Of Voter Intimidation And Attempted</u> <u>To Recruit Former Military Members To Monitor Polls In 2020–A</u> <u>Formerly Banned Tactic For Intimidating Voters.</u>

True The Vote Has Been Accused Of Engaging In Voter Suppression And Intimidation. "The misplaced focus on voter ID also detracts from attention we should be paying to more common, and consequential, problems: pamphlets giving the wrong date to vote, missing ballot boxes, voting machines that don't work. Republican groups such as True the Vote are working to sign up volunteers on Election Day to challenge voters as they show up -- a poll tax measured not in dollars but in intimidation." [Opinion, Bloomberg, <u>9/11/12</u>]

A 2012 Report From Common Cause And Demos Claimed True The Vote Aimed To Make Voting Like "Like Driving And Seeing The Police Following You." "A chilling glimpse at voter suppression efforts came this week from Common Cause and Demos, two progressive public-interest groups. Called "Bullies at the Ballot Box: Protecting the Freedom to Vote Against Wrongful Challenges and Intimidation," the report analyzes laws in 10 pivotal states. Its first paragraph quotes the leader of the Tea Party-affiliated True the Vote campaign saying the group's goal is to make voting 'like driving and seeing the police following you." [Opinion, Bloomberg, <u>9/11/12</u>]

Ahead Of The 2020 Election, True The Vote Worked To Recruit Police Officers And Former Military To Serve As Poll Watchers -- An Effort Dubbed The "Continue To Serve" Initiative. [True The Vote, <u>Accessed 11/16/22</u>]

 Intimidation Tactics At The Polls By Squads Of Former Law Enforcement And Military Officers Was Used By RNC Sponsored Groups In 1981 And Was So Egregious It Was Banned Until 2018. "There was no such task force in existence – it was the fictionalised creation of the Republican National Committee (RNC). Top conservative strategists built it from scratch, inventing a private vigilante squad of 200 off-duty police officers and private security guards.[...] The 1981 "Task Force" amounted to one of the most egregious examples of election intimidation in America's long history of voter suppression, but had a positive outcome. In the wake of those chilling events, the RNC was sued by the national and state Democratic parties. The case was settled out of court in 1982 at which point the RNC agreed to what was known as a consent decree. [...] But in 2018, the legal restrictions were lifted after the RNC persuaded a federal judge that it could be trusted not to return to the dark days of New Jersey in 1981.Now the real test of what the RNC is capable of doing, freed of legal shackles, will come in November. And last week, Trump gave forewarning of what that might entail." [The Guardian, 8/24/20]

Ahead Of The 2020 Election, True The Vote Launched A Six-Figure National Advertising Campaign Promoting In-Person Voting And Warning That House Speaker Nancy Pelosi "Could Emerge As Commander-In-Chief Next Year If Citizens Don't Vote In-Person." "True the Vote is launching a six-figure ad campaign warning that House Speaker Nancy Pelosi could emerge as commander-in-chief next year if citizens don't vote in-person in November, The Washington Times has learned. The group's founder, Catherine Englebrecht, is urging people to vote in-person and become poll watchers or else risk election chaos that could send the country careening toward a constitutional crisis before the next inauguration." [Washington Times, 8/16/20]

Greg Phillips Is A Right-Wing Activist Affiliated With True The Vote With A History Of Potential Ethics Violations And Self Enrichment, Unpaid Taxes, And Promoting Voter Fraud Conspiracies.

Conservative Operative Gregg Phillips Joined True The Vote's Board In 2015.

(1) CATHERINE ENGELBRECHT Executive Director	40 00	x
(2) DIANNE JOSEPHS Board Hember	1 00	x
(3) GREGG PHILLIPS Board Member	1 00	x
(4) BRENT MUDD Board Member	1 00	x

[True The Vote IRS Form 990, 2014, Page 6]

Phillips Was Last Included On TTV's Board In 2019.

	below dotted line)	usiee	Itrustee	3
(1) CATHERINE ENGELBRECHT EXECUTIVE DIRECTOR	38	x	F	t
(2) DIANNE JOSEPHS BOARD MEMBER	1	x	F	t
(3) GREGG PHILLIPS BOARD MEMBER		x		
(4) BRENT MUDD BOARD MEMBER	1	x		
(5)				Γ

[True The Vote IRS Form 990, 2019, Page 6]

Phillips Rose To National Prominence When He Claimed, Without Evidence, That Millions Of Illegal Votes Were Cast In The 2016 Election Was Picked Up And Amplified By Donald Trump. "Donald Trump and his aides say that between three and five million people voted illegally in the 2016 election. One man has emerged as the originator of that claim: Gregg Phillips." [BBC, <u>1/31/17]</u>

After His National Profile Rose, It Was Discovered He Owed The U.S. Government Over **\$100,000 In Unpaid Taxes.** "The conservative activist cited by Donald Trump as an authority on voter fraud owes the US government more than \$100,000 in unpaid taxes, was once accused of lying about his qualifications, and has faced several allegations of ethical impropriety." [The Guardian, <u>1/27/17</u>]

In The 1990s, Phillips Was Named Mississippi's Executive Director Of The Department Of Human Services And Was Investigated By State Legislators For Several Red Flags According To *Guardian*. "After Phillips served as chief fundraiser on his successful 1991 election campaign, Kirk Fordice, theRepublican governor of Mississippi, nominated him to be executive director of the state's department of human services. Aged just 33, Phillips was confirmed despite an investigation into his background by state legislators finding several red flags." [The Guardian, 1/27/17]

• Phillips Was Accused Of Not Filing A Statement Of Economic Interest And Failing To Pay Child Support. "Phillips also said that he was registered to vote in Madison County, Mississippi, but he did not appear in voter rolls, according to the reports. He did not file a statement of economic interests by the deadline required in state ethics law. Having been critical of "deadbeat fathers", Phillips was himself accused of failing to pay child support." [The Guardian, 1/27/17] After Phillips Left The Job In 1995, State Investigations Chastised Him In Another Report For Immediately Taking A Job With An \$84,000 Salary With A Company His Agency Has Previously Awarded A \$878,000 Contract. "State investigators then wrote another scathing report on Phillips after he resigned from the job in 1995. Phillips had immediately taken an \$84,000-a-year job with a corporation to which his department had previously awarded a state workforce training contract worth \$878,000." [The Guardian, <u>1/27/17</u>]

• The Mississippi State Legislature's Watchdog Said "[Phillip's] Actions Relative To The Contractual Arrangement Create The Appearance Of Impropriety And Could Constitute A Violation Of State Ethics Laws." [The Guardian, <u>1/27/17]</u>

Phillips As Served As The Deputy Health And Human Services Commissioner In Texas In The 2000s, A Houston Chronicle Investigation Found This Agency Gave Companies Linked To Phillips State Contracts Worth Tens Of Millions. "When Deputy Health and Human Services Commissioner Gregg Phillips and private consultant Chris Britton helped write the \$1 billion legislation to privatize Texas' human services system, they apparently did so partly with an eye on profit — their own. [...] The first two consolidation contracts went to DeLoitte for \$1.7 million and Accenture for \$1.2 million in September 2003. [...] The two companies together received more than \$167 million in payments for state services during Phillips' tenure. Company officials or lobbyists also met with Phillips at his offices." [Houston Chronicle, <u>1/02/05</u>]

After He Left The Texas Department Of Health And Human Services A Company Run By Phillips Was Awarded A \$207,000 Texas State Contract. "Gregg Phillips was the state's No. 2 social services official several years ago, and he led a push to hire a private company to evaluate applications for public assistance. Now his Austin-based company, AutoGov Inc., has received \$207,500 since November to help the state eliminate errors in deciding whether an applicant gets food stamps or other aid and how much recipients get. AutoGov was hired without other companies having a chance to bid for the work." [Dallas Morning News, 3/13/10]

True The Vote Has A History Of Promoting Disinformation About The 2020 Election.

Ahead Of The 2020 Election, True The Vote Launched A Six-Figure National Advertising Campaign Promoting In-Person Voting And Warning That House Speaker Nancy Pelosi "Could Emerge As Commander-In-Chief Next Year If Citizens Don't Vote In-Person." 'True the Vote is launching a six-figure ad campaign warning that House Speaker Nancy Pelosi could emerge as commander-in-chief next year if citizens don't vote in-person in November, The Washington Times has learned. The group's founder, Catherine Englebrecht, is urging people to vote in-person and become poll watchers or else risk election chaos that could send the country careening toward a constitutional crisis before the next inauguration." [Washington Examiner, 9/16/20]

Engelbrecht And Phillips Were Part Of The Core Team Behind The 2021 Documentary "2000 Mules," Which Peddles False Claims About Widespread Voter Fraud In The 2020 Election. "In mid-2021, "2,000 Mules" was hatched after Ms. Engelbrecht and Mr. Phillips met with Dinesh D'Souza, the conservative provocateur and filmmaker. They told him that they could detect cases of ballot box stuffing based on two terabytes of cellphone geolocation data that they had bought and matched with video surveillance footage of ballot drop boxes." [New York Times, 9/24/22]

 The New York Times Called Engelbrecht The "Star" Of "2000 Mules." "Now Ms. Engelbrecht, 52, who is riding a wave of electoral skepticism fueled by Mr. Trump, has seized the moment. She has become a sought-after speaker at Republican organizations, regularly appears on right-wing media and was the star of the recent film "2,000 Mules," which claimed mass voter fraud in the 2020 election and has been debunked." [New York Times, <u>9/24/22</u>]

Engelbrecht And True The Vote Were Sued For Defamation By Michigan Election Software Company Konnech For Spreading Conspiracies About Its Role In The 2020 Election That Led To Death Threats Against The Company And Its Leadership. "Konnech, a small Michigan company that makes election logistics software, says a "smear campaign" whipped up by the controversial group True the Vote has led to death threats and forced the company's CEO to leave home in fear for his and his family's lives. [...] Konnech, which makes scheduling software for poll workers, joined a growing number of election officials and companies that have used defamation law to try to fight back against election-related conspiracies." [NPR, 9/20/22]

True The Vote Has Been Accused Of Enriching Engelbrecht And Phillips To The Tune Of Hundreds Of Thousands Of Dollars "Rather Than Actually Rooting Out Any Fraud," Sometimes Potentially In Violation Of The Law.

<u>Center For Investigative Reporting:</u> Companies Connected To Engelbrecht And Phillips Collected Nearly \$890,000 From True The Vote From 2014 To 2020–Including \$750,000 To Phillips' Company OPSEC That Did Not Appear To Be Disclosed In TTV's 2020 990. "Companies connected to Engelbrecht and Phillips collected nearly \$890,000 from True the Vote from 2014 to 2020. The largest payment – at least \$750,000 – went to a new company created by Phillips, OPSEC Group LLC, to do voter analysis in 2020. It's unclear whether OPSEC has any other clients; it has no website and no digital footprint that Reveal could trace beyond its incorporation records. The contract, which one expert called "eye-popping" for its largess, did not appear to be disclosed in the 2020 tax return the organization provided to Reveal." [Reveal News, 6/08/22]

An Analysis Of True The Vote's Financial Records Done By *The Center For Investigative Reporting* "Paints The Picture Of An Organization That Enriches Engelbrecht And Partner Gregg Phillips Rather Than Actually Rooting Out Any Fraud." "A review of thousands of pages of documents from state filings, tax returns and court records, however, paints the picture of an organization that enriches Engelbrecht and partner Gregg Phillips rather than actually rooting out any fraud. According to the documents, True the Vote has given questionable loans to Engelbrecht and has a history of awarding contracts to companies run by Engelbrecht and Phillips." [Reveal News, <u>6/08/22</u>]

Experts Who Reviewed True The Vote's Tax Returns Said The Returns Were Messy And Made It Difficult To Understand How The Organization Spends Its Donations. "The organization's tax returns are riddled with inconsistencies and have regularly been amended. Experts who reviewed the filings said it makes it difficult to understand how True the Vote is truly spending its donations." [Reveal News, 6/08/22] True The Vote Has Reported Multiple Loans To Engelbrecht Over The Years, Potentially In Violation Of Texas Law, Including More Than \$113,000 In 2019 And A \$40,607 Loan In 2015... "True the Vote regularly reported loans to Engelbrecht, including more than \$113,000 in 2019, according to a tax filing. [...] According to its 2015 tax filings, it issued Engelbrecht a \$40,607 loan. Under Texas law, nonprofit directors can't receive loans, though employees can." [Reveal News, <u>6/08/22</u>]

• <u>Center For Investigative Reporting:</u> "Texas Law Bans Nonprofits From Loaning Money To Directors; Engelbrecht Is Both A Director And An Employee." [Reveal News, <u>6/08/22]</u>

In 2017, TTV Was In Debt By More Than \$139,000 While Engelbrecht's \$40,607 Loan From 2015 Remained On The Books–Accounting For 66% Of TTV's Assets In 2017. "In 2017, the organization was in the red by more than \$139,000. It reported having one employee, Engelbrecht, down from 11 employees in 2012. The \$40,607 loan to Engelbrecht remained on the books in 2017, accounting for more than 66% of the nonprofit's total assets." [Reveal News, 6/08/22]

<u>True The Vote Was Sued By A Former Donor Who Gave The</u> <u>Organization \$2.5 Million, Claiming True The Vote Hadn't Provided</u> <u>Evidence For 2020 Election Fraud Claims And The Money Was Instead</u> <u>Used To Enrich Phillips And Engelbrecht.</u>

Fred Eshelman, A Pharmaceutical Executive From North Carolina, Gave True The Vote A Total Of \$2.5 Million To Challenge The Results Of The 2020 Election. "The donor was Fred Eshelman, a North Carolina-based drug company founder, who gave True the Vote \$2.5 million in late 2020. Within 12 days, he asked for a refund and sued in federal court. His lawyer said that True the Vote hadn't provided evidence for its election fraud claims and that much of Mr. Eshelman's money had gone to businesses connected with Ms. Engelbrecht." [New York Times, <u>9/24/22</u>]

Using Eshelman's Money, True The Vote Provided A Retainer Of At Least \$500,000 To James Bopp's Law Firm To File Lawsuits To Block State Electors... "True the Vote provided Bopp's law firm a retainer of at least \$500,000 to lead a legal charge against the results of the 2020 election, but he filed only four of the seven lawsuits promised to a \$2.5 million donor, all of which were voluntarily dismissed less than a week after being filed." [Reveal News, <u>6/08/22</u>]

...But Bopp Only Filed Four Of The Seven Lawsuits Promised To Eshelman–And All Four Lawsuits Were Voluntarily Dismissed A Week After Filing. "True the Vote provided Bopp's law firm a retainer of at least \$500,000 to lead a legal charge against the results of the 2020 election, but he filed only four of the seven lawsuits promised to a \$2.5 million donor, all of which were voluntarily dismissed less than a week after being filed." [Reveal News, <u>6/08/22</u>]

• While TTV Paid Bopp's Firm \$500,000 For Legal Work, It Gave Engelbrecht \$30,000 From Eshelman's Donation, Which Bopp Reported Was To Oversee The Operation–But TTV Said Was Part Of Engelbrecht's Salary. "The next day, True the Vote paid Bopp a \$500,000 retainer, according to court records. It also paid Engelbrecht a total of \$30,000, the records indicate. [...] As for the \$30,000 payment to Engelbrecht from Eshelman's donation, Bopp said it was to oversee the project. True the Vote said it was part of her \$197,000 annual pay." [Reveal News, <u>6/08/22</u>]

TTV Also Paid Greg Phillip's Company, OPSEC, \$350,000 For The Project Related To Eshelman's Donation. "On Nov. 9, Phillips' OPSEC submitted a bill to True the Vote for \$350,000, according to court records. The invoice for the services is sparse; it bills for "Validate the Vote." The quantity: one. It includes a litany of items ranging from "data" to "analysis," "whistleblower" and "security," all lumped in the six-figure bill." [Reveal News, <u>6/08/22</u>]

Eshelman Sued True The Vote Twice And Asked For A Refund Of His \$2.5 Million, Arguing The Organization Failed To Produce Evidence Of Voter Fraud And Used The Money To Enrich Engelbrecht And Phillips. "The donor was Fred Eshelman, a North Carolina-based drug company founder, who gave True the Vote \$2.5 million in late 2020. Within 12 days, he asked for a refund and sued in federal court. His lawyer said that True the Vote hadn't provided evidence for its election fraud claims and that much of Mr. Eshelman's money had gone to businesses connected with Ms. Engelbrecht. Mr. Eshelman, who withdrew the suit and then filed another that was dismissed in April 2021, did not respond to requests for comment. Ms. Engelbrecht has denied his claims." [New York Times, <u>9/24/22</u>]

Conservative Arizona Attorney General Mark Brnovich Accused True The Vote Of Improperly Fundraising Off False Claims That It Had Collected Evidence Of Widespread Voter Fraud In the 2020 Election.

<u>Claims From "2000 Mules" To Arizona And Federal Law Enforcement</u> <u>Officials–Leading To GOP Arizona AG Mark Brnovich Asking Federal</u> <u>Authorities To Investigate True the Vote</u>

True The Vote Had Told The Arizona Attorney General's Office That It Had Evidence Of Widespread Voter Fraud In The 2020 Election, But This Evidence Never Materialized. "Grigsby urged the federal agencies to pursue the group after what it described as multiple suspicious interactions with leaders Catherine Engelbrecht and Gregg Phillips. Grigsby said the pair met with state investigators three times since early 2021 and promised to provide data it said would prove widespread fraud in the 2020 election — but the evidence never arrived." [Politico, 10/14/22]

True The Vote Then Falsely Claimed That They Had Provided The AG's Office With The Evidence, A Claim They Repeated To The Arizona Senate And The FBI. "Even though the group never turned over the promised data, Grigsby wrote, it began publicly claiming that it had given the state a hard drive — a claim Grigsby indicated the group also made to the Arizona Senate and to the Phoenix office of the FBI." [Politico, 10/14/22]

In October 2022, Arizona Attorney General Mark Brnovich's Office Asked The FBI And IRS To Investigate True The Vote's Potential Financial Misconduct For Fundraising Large Sums Of Off Its Unfounded Claims Of 2020 Election Fraud.

any monnectorrevidence or election have in Anzona that has red to us initiating an investigation.

TTV has raised considerable sums of money alleging they had evidence of widespread voter fraud and their efforts would train the public to protect election integrity at the polls and to help protect all voters' rights. They indicate they have provided the information to law enforcement agencies; in our case they have not after promising to do so. Another law enforcement agency has also stated they have not provided them the information, informing them they had given the information to us.

Given TTV's status as a nonprofit organization, it would appear that further review of its financials may be warranted.

[Arizona Attorney General, 10/14/22]

• True The Vote Raised \$7 Million After Donald Trump's Defeat In 2020 Purportedly To Investigate The Election Results. "After Mr. Trump's defeat, they mobilized. Ms. Engelbrecht campaigned to raise \$7 million to investigate the election's results in dozens of counties in Wisconsin, Georgia, Pennsylvania and Arizona, according to a lawsuit by a donor." [New York Times, 9/24/22]

Brnovich Accused True The Vote Of Providing False Information About Election Fraud To Law Enforcement.

TTV then began to publicly assert they had provided us with the information – to include a hard drive – and made that same claim to the Arizona State Senate and the Phoenix Office of the Federal Bureau of Investigation (FBI). Not only is this patently false, TTV acknowledged via correspondence and during a meeting with them that they had not given us the information but that they would.

[Arizona Attorney General, 10/14/22]

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