



FEDERAL ELECTION COMMISSION
 WASHINGTON, D.C. 20463

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	MUR 6540
)	
Rick Santorum for President and)	
Nadine Maenza in her official)	
capacity as Treasurer, <i>et al.</i>)	
)	

**STATEMENT OF REASONS
 OF CHAIR ELLEN L. WEINTRAUB AND COMMISSIONER STEVEN T. WALTHER**

Two corporations, Michigan Faith & Freedom Coalition and The Palazzo Grande, Inc., allegedly used corporate funds to stage a rally supporting former Senator Rick Santorum’s 2012 presidential campaign committee, Rick Santorum for President, in violation of the Federal Election Campaign Act of 1971, as amended (the “Act”), and Commission regulations.¹ MFFC is also alleged to have coordinated other 2012 election-related expenditures with the Santorum Committee, thereby making other prohibited contributions.² MFFC’s own website, media reports, and other information in the public domain corroborated the allegations in the Complaint filed in this matter. The Commission’s Office of General Counsel (“OGC”), in a thorough and well-reasoned report, recommended that the Commission find reason to believe (“RTB”) that several violations occurred.³ The recommendations failed.⁴

¹ 2 U.S.C. § 441b(a); 11 C.F.R. § 114.2(b)(1). This Statement of Reasons refers to Michigan Faith & Freedom Coalition as “MFFC,” the Palazzo Grande, Inc. as “Palazzo Grande,” Rick Santorum for President as “the Santorum Committee,” and all three Respondents collectively as “Respondents.”

² 2 U.S.C. § 441a(a)(7)(B)(i); 11 C.F.R. § 109.20(b).

³ OGC recommended that the Commission find RTB that Respondents violated the prohibition on corporate contributions in staging the rally. OGC also recommended that the Commission find RTB that MFFC made other prohibited contributions to the Santorum Committee in the form of coordinated expenditures, in light of the apparently prominent role that MFFC’s founder and President, Glenn Clark, played in Santorum’s Michigan campaign. OGC further recommended that the Commission authorize a limited investigation to determine the value of the corporate resources used to stage the rally and whether MFFC made other expenditures in coordination with the Santorum campaign. See First General Counsel’s Report (“FGCR”) at 3, 21.

⁴ We voted to approve OGC’s recommendations; Vice Chairman McGahn and Commissioners Hunter and Petersen dissented. See Certification in MUR 6540, dated May 10, 2013. Commissioner Petersen then made a motion to find reason to believe that Respondents violated only the prohibition on corporate contributions related to the rally,

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In a Statement of Reasons explaining their rejection of OGC's recommendation, two of our colleagues assert that OGC was wrong to bring the additional corroborating publicly available information to the Commission's attention.⁵ The unavoidable implication of this position is that our colleagues are comfortable with the Commission remaining willfully uninformed regarding publicly available information when we evaluate complaints. This approach finds no support in the Act, Commission regulations, or long-established practice. For example, if a complaint on its face would lead a Commissioner to find reason to believe that a violation has occurred, but there is also public information available that definitively refutes the allegations presented in the complaint, would our colleagues have us ignore such public information? We reject such an interpretation of the law, which would cripple fair enforcement, and expect OGC to continue formulating careful recommendations using publicly available information, exactly as they appropriately did in this case.⁶

The Act requires only that a complaint "be in writing, signed and sworn to by the person filing [it]," and that it be "notarized" and "made under penalty of perjury...."⁷ A complainant is not obligated to make a voluminous submission, so, without an investigation, there was never a chance to develop an actual record here beyond the Complaint, Responses, and information in the public domain.

which he and the Chair voted to approve; Vice Chairman McGahn and Commissioners Hunter and Walther dissented (although for different reasons). *Id.* Chair Weintraub believed that Commissioner Petersen's proposal was an acceptable compromise enabling reasonable enforcement of the law. Commissioner Walther, however, could not support a motion that did not also include OGC's recommendation to find reason to believe that MFFC violated the prohibition on corporate contributions related to coordinated expenditures.

Given the potential for compromise evidenced by the vote on Commissioner Petersen's proposal, Chair Weintraub then suggested that the Commission refrain from closing the file until after the arrival of new Commissioners in hopes that four votes might emerge, reasoning that even a partial decision supported by a bipartisan majority would offer greater clarity to the regulated community than a split vote. Our three Republican colleagues did not agree, and Commissioner Walther, while sympathetic to the Chair's position, ultimately voted with them to close the file. *See* Certification in MUR 6540, dated May 21, 2013. Commissioner Walther believed that, given that the Commission had already deadlocked, and since there were no nominees pending at that time, both the Complainant and the Respondents were procedurally entitled to prompt resolution.

Although we disagreed on some of the procedural votes in this matter, we agree that our colleagues' accusation that the Chair's position was motivated by partisanship is baseless. *See* Statement of Reasons of Vice Chairman Donald F. McGahn and Commissioner Caroline C. Hunter in MUR 6540, dated July 25, 2013, at 2 n.4 ("McGahn/Hunter Statement"). Even had there been support for holding over consideration of Commissioner Petersen's proposal pending a full complement of Commissioners, a minimum four-vote bipartisan majority – including at least one Republican – would have still been required to take action in this matter.

⁵ McGahn/Hunter Statement at 5-16.

⁶ *See* Office of General Counsel Enforcement Manual (dated June 2013) at 10, 39, 45, available at http://www.fec.gov/agenda/2013/nitgdoc_13-21-b.pdf. Enforcement Division guidelines instruct staff attorneys to review "relevant information ascertained in the normal course of carrying out the Commission's supervisory responsibilities, which may include press accounts and publicly available information." *Id.* at 10.

⁷ 2 U.S.C. § 437g(a). In fact, complainants may file allegations based only on "information and belief" rather than personal knowledge. 11 C.F.R. § 111.4(c).

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RTB is merely the initial stage of the Commission's enforcement process. When the Commission votes on a recommendation at the RTB stage, it is not making a final, definitive determination about whether a violation has occurred.⁸ Rather, "reason to believe" is simply a finding that there is sufficient legal justification to open an investigation.⁹ It is not until the Commission later reaches conciliation with respondents, often after an investigation, or makes a probable cause determination that the Commission may make a final determination that the law has been violated. Our colleagues' interpretation of the law elevates the RTB standard beyond what the Act requires, making it difficult for complainants not highly skilled in the law to ever file a complaint worthy of an RTB finding. Under our colleagues' theory, the enforcement process becomes inaccessible to all but the most sophisticated of complainants, which is at odds with Congress's clear intent that "any person" be able to file a complaint.¹⁰

In this matter, OGC amply demonstrated that the conduct alleged in the Complaint merited an RTB finding.

The Appropriate Use of Public Information

Underlying our colleagues' rejection of OGC's recommendations is an issue with much broader reach than this specific matter: whether, in preparing RTB recommendations, OGC may include information from the public domain, including information derived from credible newspaper articles, websites, and other publicly available sources. It is absolutely appropriate – indeed, essential – for such information, *either inculpatory or exculpatory*, to be part of OGC's recommendations if the Commission is to make informed and fair decisions at the pre-RTB stage.¹¹ Consideration of such information in evaluating a complaint is wholly consistent with

⁸ See Guidebook for Complainants and Respondents on the FEC Enforcement Process, May 2012, available at http://www.fec.gov/em/respondent_guide.pdf.

⁹ See Statement of Policy Regarding Commission Action in Matters at the Initial Stage in the Enforcement Process, 72 Fed. Reg. 12545 (March 16, 2007) ("Initial Stage of Enforcement Policy Statement"). The Commission's Legislative Recommendation in 2004 and 2005 to replace the statutory phrase "reason to believe" with "reason to open an investigation" was made precisely to clarify this point. See *id.*; FEC Legislative Recommendations 2004, available at http://www.fec.gov/pages/legislative_recommendations_2004.htm ("[T]he change in terminology recommended by the Commission would not change the standard that this finding simply represents that the Commission believes a violation may have occurred if the facts as described are accurate."); FEC Legislative Recommendations 2005, available at http://www.fec.gov/law/legislative_recommendations_2005.shtml#r8 (including same disclaimer that no substantive change was intended). That proposal has been endorsed by, among others, the Center for Competitive Politics, an organization strongly opposed to expansive campaign finance investigations. See CCP Comment in Response to Notice 2013-01, Request for Comment on Enforcement Process, Apr. 9, 2013, at 10, available at <http://www.fec.gov/law/policy/enforcement/2013/centercompolitics.pdf>. The suggestion that the Commission was actually asking Congress to implement a more "lenient" standard (see McGahn/Hunter Statement at 8) is not supported by the record.

¹⁰ See 2 U.S.C. § 437g(a)(1).

¹¹ In the interests of fairness, and in response to concerns raised by our colleagues, OGC began the informal practice of notifying respondents of "publicly available information that may be relevant to the allegations in the complaint" and providing respondents with an "opportunity to review" these materials and "supplement" their responses, which is precisely what OGC did in this matter. See note 26 below. In late 2011, Commissioner Walther drafted a proposal that would have formally codified OGC's practice. See Draft Agency Procedure for Notice to Named Respondents in Enforcement Matters of Additional Material Facts and/or Additional Potential Violations, available

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the Act, basic principles of administrative law, longstanding Commission practice, and common sense.

Almost half of our colleagues' 29-page statement is devoted to arguing a noncontroversial point: the Commission's staff cannot begin *an investigation* before the Commission has voted to find reason to believe that a violation has occurred.¹² But they ignore the central issue: whether reviewing newspaper articles, websites, and other publicly available information constitutes an "investigation" to begin with.

No court interpreting the Act has ever held that reading the newspaper or similar activity constitutes an inappropriate "pre-RTB investigation." To the contrary, courts have consistently instructed the Commission to take into consideration "all available information" in evaluating the merits – or demerits – of a complaint. For example, in a 1979 case affirming the Commission's decision, at the pre-RTB stage, not to investigate a complaint, *In re FECA Litigation*, the United States District Court for the District of Columbia stated:

"[I]t seems clear that the Commission *must take into consideration all available information concerning the alleged wrongdoing*. In other words, the Commission may not rely solely on the facts presented by the sworn complaint when deciding whether to investigate. Although the facts provided in a sworn complaint may be insufficient, when coupled with other information available to the Commission gathered either through similar sworn complaints or through its own work the facts may merit a complete investigation. By the same token, a persuasive and strong complaint may not merit an investigation because the Commission possesses reliable evidence indicating that no violation has occurred. Thus, *it is clear that a consideration of all available material is vital to a rational review of Commission decisions.*"¹³

The same court later reaffirmed this reasoning in another case, *Antosh v. FEC*.¹⁴ In that case, the court overturned the Commission's dismissal of a complaint because the Commission had failed, at the pre-RTB stage, to adequately consider facts contained in a previously filed, publicly available report.¹⁵ Thus, if the Commission ignores public information that is relevant

at http://www.fec.gov/agenda/2011/mtgdoc_1165.pdf. Although there was not agreement on the proposal, several Commissioners expressed support for a formal procedure not unlike the current practice. See FEC Open Meeting Agenda for Dec. 1, 2011, Audio Recording for Agenda Item II, available at <http://fec.gov/audio/2011/2011120102.mp3>. The Commission remains free to resume crafting an appropriate policy if Commissioners believe such a formal policy is warranted.

¹² McGahn/Hunter Statement at 5-16.

¹³ 474 F. Supp. 1044, 1046 (D.D.C. 1979) (*emphasis added*).

¹⁴ 599 F. Supp. 850 (D.D.C. 1984).

¹⁵ *Id.* at 855.

to the decision at the pre-RTB stage, there is a risk that a court will find that the Commission's decision was not backed by "substantial evidence."¹⁶

Taking public information into account when evaluating a complaint is entirely consistent with the Act's requirement of an RTB finding prior to any investigation. Commission regulations specifically enumerate a variety of intrusive processes that are a standard part of any post-RTB investigation, including "field investigations,"¹⁷ audits,¹⁸ "written questions under order,"¹⁹ subpoenas,²⁰ and depositions.²¹ Nowhere, however, do these regulations mention accessing information in the public domain – which stands to reason, since such information is already equally available to all, including respondents, the Commission, and the public.

Indeed, the Commission's longstanding internal rules indicate that it is appropriate for OGC attorneys to consult information in the public domain prior to the Commission finding RTB. First, as our colleagues acknowledge, Commission Directive 6, approved in April of 1978, provides that the Commission may initiate a MUR based solely on a news article, and that it is appropriate for OGC to recommend that the Commission *do so*.²² Second, the Commission's 2007 statement of policy concerning the initial stage of the enforcement process specifically reaffirms that, in making RTB determinations, the Commission will consider "the available evidence,"²³ which has been understood for decades to include information identified by OGC from the public domain. Throughout the history of the Commission, Commissioners on both sides of the aisle have approved recommendations based on such information.²⁴

¹⁶ *See also LaBatz v. FEC*, 889 F. Supp. 2d 51 (D.D.C. 2012). If a complainant believes that the Commission has wrongfully dismissed a complaint, the complainant may seek a court judgment that the Commission's dismissal was contrary to law. 2 U.S.C. § 437g(a)(8).

¹⁷ 11 C.F.R. § 111.10(b).

¹⁸ *Id.*

¹⁹ 11 C.F.R. § 111.11.

²⁰ 11 C.F.R. § 111.12.

²¹ *Id.*; *see also generally* 11 C.F.R. § 111.10(b).

²² *See* http://www.fec.gov/directives/directive_06.pdf.

²³ Initial Stage of Enforcement Policy Statement, 72 Fed. Reg. at 12545.

²⁴ *See, e.g.*, MUR 6238 (MyCongressmanIsNuts.com) (no RTB based on review of respondent's website and Facebook page); MUR 6224 (Fiorina) (no RTB based in part on review of public news reports); MUR 6084 (John Kennedy for U.S. Senate) (dismissal based on review of ad on YouTube); MUR 5666 (MZM, Inc.) (RTB based partly on review of public news reports); MUR 5581 (Wark) (RTB based in part on review of public news reports); MUR 5562 (Sinclair Broadcast Group, Inc.) (no RTB based in part on review of public news reports); MUR 5542 (Texans for Truth) (RTB based in part on review of public news report and statements from respondent's website); MUR 5421 (Kerry for President) (RTB based in part on review of public news reports); MUR 5408 (Sharpton) (RTB based in part on review of public news reports); MUR 5380 (DeLay Congressional Committee) (RTB based in part on "due diligence review of the public record," including news reports); MUR 5328 (PAC to the Future) (RTB based in part on review of public news reports); MUR 5279 (Bill Bradley for President, Inc.) (RTB based in part on review of public news reports); MUR 5248 (Ralph Reed) (no RTB based in part on review of public news reports); MUR 5035 (Schrock) (no RTB based in part on review of public news reports); MUR 5025 (Roukema) (no RTB

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In fact, our colleagues themselves have issued decisions based on public information.²⁵ In the past, when OGC has sought to rely on public information, our colleagues regularly insisted that such materials be sent to respondents. Now they excoriate OGC for following a procedure for which they themselves have expressed support.²⁶ Moreover, our colleagues continue to embrace Directive 6,²⁷ conceding that, under the Directive, OGC may bring relevant public information to the Commission's attention before an RTB finding without engaging in an "extra-statutory pre-RTB investigation."²⁸ This position and our colleagues' current interpretation of the Act are clearly inconsistent.²⁹

Their approach leads to incongruous results, as this very matter illustrates. Our colleagues refused to find RTB based on their conclusion that the rally staged by MFFC on Palazzo Granite's premises eleven days before the presidential primary was not a campaign event, but rather "an issues-oriented forum."³⁰ But one merely needs to visit MFFC's publicly available website advertising the rally to see that the event's very *name* was "Road to Victory

based in part on public news reports); MUR 5020 (Trump Hotels & Casinos) (RTB based in part on review of public news reports and business website); MUR 4650 (Enid '94/Enid '96) (RTB based in part on review of public news reports); MUR 4568 (Triad Management Services, Inc.) (RTB based in part on review of public news reports).

Kenneth Gross, a respected practitioner who served as Associate General Counsel and head of the Enforcement Division at the FEC from 1980-1986, recently described the notion of preventing OGC from looking at public information as "ridiculous," adding: "To hamstring staff from taking into account information out there in the public arena makes no sense. I've never heard of such a thing." See Matea Gold, *FEC Engulfed in Power Struggle Over Staff Independence*, WASH. POST ONLINE, July 13, 2013, available at http://articles.washingtonpost.com/2013-07-13/politics/40552461_1_fec-power-struggle-commissioners. See also FEC, ANNUAL REPORT 1976 52 & n.5 (1976) (distinguishing "an inquiry ... where further information is required before a determination can be made that there is reason to believe" from "an investigation").

²⁵ *E.g.*, Factual and Legal Analysis in MUR 6330 (Johnson) at 8-9 ("In addition to the documents submitted by Respondents, the Commission also reviewed publicly available information such as news articles, social network sites, and website articles...."). Other examples are listed in note 24 above.

²⁶ See Statement of Reasons of Vice Chairman Matthew S. Petersen and Commissioners Caroline C. Hunter and Donald F. McGahn in MUR 6056 (Protect Colorado Jobs), dated June 1, 2009 ("[I]f we assume *arguendo* that certain limited reviews of publicly available materials are permissibly undertaken ... then any unearthed facts or allegations that OGC uses to support RTB recommendations should be provided to respondents so that they may have a full and fair opportunity to challenge them before the Commission votes on those recommendations."). In this matter, OGC sent a letter to Respondents' counsel on October 2, 2012 enclosing the news articles and other public sources that OGC reviewed. OGC's letter made clear that any supplemental response from Respondents was "strictly voluntary" and that not providing such a supplemental response would not result in any "adverse inference." The letter and its enclosures are appended to this Statement as Attachment A. See also note 11 above.

²⁷ McGahn/Hunter Statement at 14-15.

²⁸ *Id.* at 5.

²⁹ Despite their reliance on Directive 6, our colleagues never suggested that the facts they refused to consider here be brought to the Commission's attention using the Directive.

³⁰ McGahn/Hunter Statement at 18.

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Rally '12.”³¹ The flyer available at that website advertises that the rally will be “Featuring Senator Rick Santorum;” the next line reads “Fighting for Faith, Family & Freedom,” a Santorum campaign slogan.³² Contemporaneous media reports note that Glenn Clark, MFFC’s president and the rally’s main organizer, hoped the rally would “have a big impact on the Michigan presidential primary” and afford attendees the opportunity to hear from “the leading presidential candidate.”³³ According to news reports, Clark introduced himself to rally attendees as a “Santorum backer.”³⁴ When Santorum himself took the podium, the candidate told the assembled crowd: “[Y]our country needs you to step forward here in Michigan.... First, to make sure we have [t]he right candidate in the general election.”³⁵ Later, the candidate added that “Michigan can set this race on its ear.... [Y]ou have an opportunity to speak loudly.... What ... this race comes down to is, what kind of country do you want to give your children.”³⁶ These remarks are typical of a campaign stump speech. Contrary to the Respondents’ assertions,³⁷ there even appear to have been Santorum campaign signs at the rally, as evidenced by a photograph accompanying one of the public articles that OGC reviewed.³⁸ Certainly, the rally also featured discussion of a wide range of issues – but the common thread was their relation to the 2012 election.

While, in this case, public information corroborated the allegations in the Complaint, such public information is often also used for exculpatory purposes.³⁹ Contrary to what our colleagues suggest in their statement, there are many matters in which OGC has used public information to support a recommendation of “no RTB” or discretionary dismissal.⁴⁰ Our

³¹ FGCR at 6.

³² *Id.* The rally coincided with the Santorum campaign’s “Faith, Family & Freedom Tour.” See <http://www.ricksantorum.com/pressrelease/senator-santorum-launches-%E2%80%9Cfaith-family-and-freedom-tour%E2%80%9D>.

³³ FGCR at 13.

³⁴ *Id.* at 8 (citing Complaint, Exhibit A).

³⁵ *Id.* at 7.

³⁶ *Id.* at 8.

³⁷ MFFC Response at 2; Santorum Committee Response at 1.

³⁸ See Marina Cracchiolo, *Rick Santorum: Turn Away from “Snobbish Elite,”* HARTLAND PATCH (Feb. 17, 2012), available at <http://hartland.patch.com/articles/rick-santorum-pleads-with-shelby-township-to-pick-right-candidate> (“Cracchiolo Article”) (photo included in online article shows individual holding Santorum campaign sign). A hard copy of this article was included with the letter OGC sent to Respondents. See Attachment A, Enclosure 6.

³⁹ Numerous examples are described in note 24 above and note 40 below.

⁴⁰ See, e.g., FGCRs in MUR 6558 (Jenkins) (recommending dismissal based in part on a newspaper article); MUR 6462 (Trump) (recommending no RTB based in part on newspaper articles, YouTube videos, and respondent’s website); MUR 5965 (Fischer for Senate) (recommending dismissal based in part on information obtained on a domain name registration website); MUR 6127 (Obama for America) (recommending dismissal based on information obtained from a travel website); MURs 6295 & 6307 (Lowden) (recommending dismissal based in part on rental vehicle websites). Numerous other examples are described in note 24 above.

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colleagues' assertion – unsupported by reference to any facts, specific matters, or events – that OGC “generally omit[s] exculpatory information” is simply not consistent with the historical record.⁴¹ This accusation, unaccompanied by any supporting facts, has the unfortunate result of unfairly impugning the professionalism and integrity of our staff, who have no public platform to defend themselves.

FEC staff must always endeavor to provide the Commission with the best information available – *either inculpatory or exculpatory* – in formulating RTB recommendations. This task sometimes necessitates reviewing materials available in the public domain.⁴² In this case, OGC was thorough and professional. There is nothing in the realms of law or common sense to suggest that our lawyers should do their jobs – or that we should do ours – with blinders on. Willfully uninformed decision-making is not a requirement of the Act. To the contrary, the Commission has an obligation to take publicly available information into account when making RTB, or no RTB, findings.

The Rally

Turning to this specific matter, the Complaint alleges that MFFC and Palazzo Grande made, and the Santorum campaign accepted, prohibited corporate contributions when corporate resources were used to stage the rally.⁴³

The Act's prohibition on corporate contributions is broad and unequivocal. Corporations, including non-profit corporations like MFFC, may not make contributions to candidates or their committees.⁴⁴ This prohibition on corporate contributions applies to direct or indirect payments, gifts, services, or, indeed, “anything of value” given “for the purpose of influencing any election for Federal office.”⁴⁵ By regulation, the Commission has specifically defined “anything of value” to include “the provision of goods or services” either without charge or for less than the

⁴¹ McGahn/Hunter Statement at 13.

⁴² Drawing upon appropriate resources to formulate careful recommendations is the essence of an enforcement attorney's job. To say that a due process concern arises because attorneys will sometimes, but not always, consult material in the public domain, *see id.*, proves too much. The same could be said for legal research using a commercial electronic legal library, like Westlaw or Lexis/Nexis. Just as Westlaw or Lexis/Nexis research is unnecessary if a legal issue is already familiar, review of the public domain may be unnecessary if, for example, the respondent does not dispute engaging in the relevant conduct or the complaint alleges only conduct that is plainly permissible. These are determinations appropriately left to OGC's professional judgment in the first instance. There is no indication that OGC has exercised this judgment in a biased manner. To the contrary, OGC has consistently included both exculpatory and inculpatory public information in recommendations concerning respondents affiliated with both major parties and a wide variety of ideological viewpoints. *See, e.g.*, notes 24 and 40 above. Nevertheless, Commissioners who disagree with OGC's approach in any particular case remain free to vote against the staff recommendation.

⁴³ Complaint at 3.

⁴⁴ 2 U.S.C. § 441b(a); 11 C.F.R. § 114.2(b)(1).

⁴⁵ 2 U.S.C. §§ 431(8)(A)(i), 441b(b)(2); *see also* 11 C.F.R. §§ 100.52(d)(1), 114.1(a)(1).

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usual and normal charge.⁴⁶ Furthermore, Commission regulations specifically state that such impermissible corporate contributions include “advertising services” and “facilities.”⁴⁷

OGC’s conclusion that there is RTB that MFFC and Palazzo Grande made prohibited contributions to the Santorum campaign is well-founded. The rally, for which Palazzo Grande donated free access to its 25,000 square foot Palazzo Grande Banquet and Event Center, took place eleven days before the Republican presidential primary and was called the “Road to Victory Rally ‘12.” An estimated 1,500 people attended.⁴⁸ Clark said that the rally’s purpose was “to have a big impact on the Michigan presidential primary” and introduced himself to the attendees as a “Santorum backer.”⁴⁹ Santorum’s own featured speech made the case for his candidacy, and called on the attendees to “make sure we have the right candidate for the general election.”⁵⁰ There also appear to have been Santorum campaign signs at the rally.⁵¹

For a corporation to fund a forum for a campaign-related event ordinarily constitutes a prohibited contribution, although there are limited exceptions to this broad prohibition. For example, a corporation “may allow a candidate ... to address its restricted class,” *i.e.* its stockholders and executive or administrative personnel and their families,⁵² “at a meeting, convention or other function of the corporation.”⁵³ A corporation may also allow candidates “to address or meet” any employees of the corporation and their families,⁵⁴ but only if several criteria are met, including that other candidates for the same office must be invited to appear,⁵⁵ and that the corporation itself not expressly advocate for the candidate.⁵⁶ Both types of meetings or events may include only a very limited set of other attendees, including “other guests of the corporation *who are being honored or speaking or participating in the event.*”⁵⁷

These narrow exceptions plainly do not apply to this set of facts. There was no effort to restrict attendance at the rally to either MFFC or Palazzo Grande’s employees or restricted class.

⁴⁶ 11 C.F.R. § 100.52(d)(1).

⁴⁷ *Id.*

⁴⁸ FGCR at 6-8.

⁴⁹ *Id.* at 13.

⁵⁰ *Id.* at 8.

⁵¹ See Cracchiolo Article.

⁵² See 11 C.F.R. § 114.1(j)

⁵³ 11 C.F.R. § 114.3(c)(2).

⁵⁴ 11 C.F.R. § 114.4(b)(1).

⁵⁵ 11 C.F.R. § 114.4(b)(1)(ii).

⁵⁶ 11 C.F.R. § 114.4(b)(1)(v).

⁵⁷ 11 C.F.R. §§ 114.3(c)(2)(i), 114.4(b)(1) (emphasis added).

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The 1,500 attendees did not even need tickets.⁵⁸ The main organizer, Clark, billed the rally as an effort to "have a big impact" on the upcoming primary, and specifically endorsed Santorum in his remarks. It is undisputed that no other candidate was invited to participate in the rally.⁵⁹ The Commission recently considered facts that were arguably less clear-cut, involving a rally featuring several Republican candidates, and *unanimously* agreed that "the restricted class exemption does not appear to apply."⁶⁰

Thus, in our view, this is not a hard case. Nevertheless, in the McGahn/Hunter Statement, our colleagues suggest that the 1,500 attendees at the rally may have been "other guests of the corporation" who were "participating in the event," and argue that uncertainty about this issue precludes enforcement on due process grounds.⁶¹ This argument cannot be squared with their own previous position or with the Commission's Explanation and Justification ("E&J") of the original rule. According to the E&J, the narrow exception-within-an-exception that our colleagues now invoke "allows guests who are being honored or speaking or participating in the event (*i.e. those who are part of the program*), to be present during the candidate appearance."⁶² No one has suggested that all 1,500 attendees at the rally were "part of the program." Such an argument would render the limitations on who can attend corporate events featuring candidates essentially meaningless.

Moreover, our colleagues have incorrectly relied on two advisory opinions permitting corporations to sponsor events with candidates in attendance, Advisory Opinions 1996-11 (National Right to Life Conventions, Inc.) ("NRLC") and 1980-22 (American Iron and Steel Institute) ("AISI").⁶³ NRLC involved a non-profit corporation that sought to invite two incumbent legislators to speak about "legislative efforts and proposals in Congress and other issues of interest to pro-lifers." The Commission stated that the event would be permissible, but only if NRLC agreed to four specific conditions, including that neither the speakers nor the corporation could expressly advocate for any candidate's nomination, election or defeat.

⁵⁸ FGCR at 7.

⁵⁹ *Id.* at 9-11. Respondents claim other candidates were invited to alternative events, but even if such events would constitute "similar opportunit[ies] to appear," *see* 11 C.F.R. 114.4(b)(1)(ii), that fact is not sufficient to trigger the section 114.4(b)(1) exception for the rally because the general public was invited, not just Respondents' employees. Further, there is no available information to support Respondents' assertions beyond Clark's unsworn statement on behalf of MFCC and unsworn representations from the Santorum Committee's counsel.

⁶⁰ Statement of Reasons of Chair Caroline C. Hunter, Vice Chair Ellen L. Weintraub, and Commissioners Donald F. McGahn, Cynthia L. Bauerly, Matthew S. Petersen, and Steven T. Walther in MUR 6459 (Iowa Faith and Freedom Coalition) at 3. Notwithstanding the apparent violation, the Commission voted unanimously to exercise its prosecutorial discretion to dismiss the matter based on the small amounts in violation. *Id.* at 3-4.

⁶¹ McGahn/Hunter Statement at 17.

⁶² Corporate and Labor Organization Activity; Express Advocacy and Coordination with Candidates, 60 Fed. Reg. 64,260, 64,268 (Dec. 14, 1995) (emphasis added).

⁶³ McGahn/Hunter Statement at 19-20. Notably, Advisory Opinion 1996-11 (NRLC) specifically states that the activity in question does not fall under the exceptions at 11 C.F.R. §§ 114.3(c)(2) and 114.4(b)(2), which our colleagues invoke.

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Similarly, AISI wished to sponsor a series of “town meetings” featuring incumbent legislators discussing “issues facing the steel industry.” AISI, like NRLC, represented that neither the corporation nor the speakers would make remarks relating to campaign activity. Again, the Commission conditioned its affirmative response on the absence of any express advocacy or solicitation of campaign funds.

The fact that the speakers in both these advisory opinions were sitting legislators is not a coincidence. A member of Congress seeking reelection by necessity wears two hats: that of a candidate and that of an officeholder. These advisory opinions allow important aspects of the officeholder’s work to continue while he or she is a candidate – *if* the participants adhere to certain conditions that largely preclude campaign-related activity. The rally, on the other hand, appears to have been almost entirely campaign-related. It did not feature a sitting officeholder. Its express purpose, according to Clark, was to influence the upcoming election. Clark named Santorum at the rally, and Santorum appears to have used his own featured speech to make the case for his candidacy. The advisory opinions our colleagues invoke are decidedly not on point.⁶⁴

For all of these reasons, and those ably set forth in the FGCR, we concurred with OGC that there was a sufficient basis to investigate whether Respondents violated the prohibition on corporate contributions by staging the rally.

Other Contributions

In addition to the rally, the Complaint asserts that MFFC coordinated its other expenditures related to the 2012 election with the Santorum Committee, resulting in prohibited corporate contributions.⁶⁵

Under the Act and Commission regulations, election-related expenditures that are made “in cooperation, consultation, or concert, with, or at the request or suggestion of, a candidate, his authorized political committees, or their agents” constitute contributions.⁶⁶ Corporations are not permitted to make contributions to federal candidates, and therefore may not coordinate their election-related expenditures with candidates.⁶⁷

⁶⁴ Moreover, their draft in Advisory Opinion 2012-29 (Hawaiian Airlines, Inc.), which failed by a vote of 3-3, is not precedential. *See* McGahn/Hunter Statement at 20 n.63. There appears to be only one instance in an advisory opinion in which the Commission addressed a speaking event involving a non-officeholder and that event did not include a single reference to the election. *See* Advisory Opinion 1992-06 (Duke).

⁶⁵ Complaint at 2.

⁶⁶ 2 U.S.C. § 441a(a)(7)(B)(i); 11 C.F.R. § 109.20(b).

⁶⁷ On the subject of coordination more generally, our colleagues accuse former Commissioner Bauerly and us of selectively enforcing the law, implying that we dismissed MUR 6502 (Nebraska Democratic Party), a case against a state Democratic party committee, for partisan reasons. McGahn/Hunter Statement at 29 n.93. We released a statement at the time the case went public, explaining that we joined our Republican colleagues in a unanimous Commission vote to approve OGC’s recommendation to find no RTB that a violation occurred “because the record did not contain sufficient information that the ads [in question] were ‘for the purpose of influencing’ a Federal election, as required by the Act.” *See* Statement of Reasons of Vice Chair Ellen L. Weintraub and Commissioners

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Again, OGC's RTB recommendation related to coordination was entirely appropriate.⁶⁸ According to news reports, Clark, MFFC's founder and president, also had a high-profile official role with the Santorum campaign. Clark was described, varyingly, as the Santorum campaign's "statewide grassroots coordinator," "state political director," and one of two individuals forming the "core" of Santorum's campaign in Michigan.⁶⁹ Clark himself was quoted recounting conversations with Santorum about planning campaign events in Michigan.⁷⁰ Apparently concerned about Clark's involvement with the Santorum Committee, the executive director of the national Faith and Freedom Coalition reportedly asked Clark to take a leave of absence for the duration of the campaign.⁷¹ Respondents characterize Clark as a volunteer and deny that he had access to any "non-public" information about the Santorum campaign, but even they admit that he had an official role in the campaign at the same time that he served as MFFC's president.⁷² Moreover, they do not deny that Clark was involved in MFFC's election-related expenditures.

Simply stated, when an individual takes on a prominent role with a federal campaign, it can be reasonably inferred that any expenditures made at that individual's direction that benefit the campaign may have been made "in cooperation, consultation, or concert" with it. In this case, the available information suggests that Clark was not a mere ground-level volunteer; he had a statewide role and access to the candidate. Respondents' unsworn denials (in one case through counsel), while relevant, are not dispositive.

For these reasons, we concurred with OGC that there was sufficient justification to investigate whether MFFC made additional contributions to the Santorum campaign in the form of coordinated expenditures.

Cynthia L. Bauerly and Steven T. Walther in MUR 6502 (Nebraska Democratic Party), dated Aug. 15, 2012. Once again, our colleagues' accusation of partisanship is baseless.

⁶⁸ See FGCR at 17-19.

⁶⁹ *Id.* at 4-5.

⁷⁰ *Id.* at 18.

⁷¹ *Id.* at 8-9. Clark declined to do so. *Id.*

⁷² MFFC Response at 2; Santorum Committee Supplemental Response at 2.

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Accordingly, we voted in favor of OGC's recommendations.

8/22/13
Date

Ellen L. Weintraub
Ellen L. Weintraub
Chair

8/22/13
Date

Steven T. Walther
Steven T. Walther
Commissioner

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ATTACHMENT A

13044342466



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 2, 2012

By E-mail & U.S. Mail

Cleta Mitchell, Esq.
Foley & Lardner LLP
3000 K Street, NW
Suite 600
Washington, DC 20007-5109
Email: cmitchell@foley.com

Re: MUR 6540
Rick Santorum for President and Nadine Maenza
in her official capacity as treasurer
Michigan Faith & Freedom Coalition
Glenn Clark
The Palazzo Grande, Inc.

Dear Ms. Mitchell:

On March 27, 2012, the Federal Election Commission notified your client, Rick Santorum for President and Nadine Maenza in her official capacity as treasurer, of a complaint designated MUR 6540 alleging violations of the Federal Election Campaign Act of 1971, as amended (the "Act"). The Commission received your response, and the Commission's Office of the General Counsel ("OGC") now is reviewing the matter so that it may make a recommendation about whether there is – or is not – reason to believe that the conduct alleged in the complaint violated the Act. In the course of its review, it has identified the enclosed publicly available information that may be relevant to the allegations in the complaint. Before OGC completes its review and makes its recommendation to the Commission, we would like to provide you with an opportunity to review this information and supplement your response, if you would like to do so.

To be clear, you are not required to provide any further response. Therefore, any supplemental response you may choose to submit would be strictly voluntary. No adverse inference will be drawn if you choose not to respond further. On the other hand, OGC will take into account any additional information you provide before completing its review and submitting its recommendation to the Commission. If you choose to supplement your earlier response, please do so in writing within the next ten (10) days. If we do not hear from you, we will proceed based on the information now available.

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Cleta Mitchell, Esq.
October 2, 2012
Page 2 of 2

If you have any questions, please contact me at (202) 694-1597.

Sincerely,

A handwritten signature in black ink, appearing to read "LEEVANS", written over a dotted line.

Leonard O. Evans III
Attorney, Enforcement Division

Enclosures

13044342468

List of Enclosures

1. Brad D. Bates, *Santorum to speak Friday at Shelby Township event*, C&G NEWS, Feb. 14, 2012, <http://www.candgnews.com/news/santorum-speak-friday-shelby-township-event>.
2. David Taintor, *Could Rick Santorum Really Win Michigan?*, TPM2012, Feb. 14, 2012, <http://2012.talkingpointsmemo.com/2012/02/could-rick-santorum-really-win-michigan.php>.
3. Rob Montilla, *Road to Victory Rally '12 Featuring Senator Rick Santorum*, REPUBLICAN CMTE OF N. MACOMB COUNTY (Feb. 14, 2012), <http://renmc.com/2012/02/road-to-victory-rally-12-featuring-senator-rick-santorum/>.
4. Paul Harris, *Evangelicals spread the gospel of Rick Santorum in blue-collar Michigan*, THE GUARDIAN, Feb. 16, 2012, <http://www.guardian.co.uk/world/2012/feb/16/evangelicals-rick-santorum-michigan>.
5. MFFC, *Road to Victory Rally '12 Featuring Sen. Rick Santorum*, FACEBOOK EVENTS (Feb 17, 2012), <http://www.facebook.com/events/329973113711267/>.
6. Marina Cracchiolo, *Rick Santorum: Turn Away from "Snobbish Elite,"* HARTLAND PATCH (Feb. 17, 2012), <http://hartland.patch.com/articles/rick-santorum-pleads-with-shelby-township-to-pick-right-candidate>.
7. Chad Selweski, *"Michigan can set this race on its ear," Santorum tells Macomb County*, THE OAKLAND PRESS, Feb. 17, 2012, http://www.theoaklandpress.com/articles/2012/02/17/news/local_news/doc4f3ef2db04df9205452847.txt.
8. Salena Zito, *Michigan Pivotal for GOP front-runners*, PITT. TRIBUNE-REVIEW, Feb. 18, 2012, http://triblive.com/x/pittsburghtrib/news/s_782298.html/#axzz26Ms2J3oa.
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Enclosure 1

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Shelby Township

February 14, 2012

Santorum to speak Friday at Shelby Township event

By Brad D. Bates
C & G Staff Writer

With the Feb. 28 U.S. presidential primary around the corner, Sterling Heights native Glenn Clark thought he'd help out his friend Rick Santorum.

Fresh off Santorum's Feb. 7 primary wins in Missouri, Colorado and Minnesota, he will be the first Republican presidential hopeful to speak in Macomb County at 11:15 a.m. Feb. 17 at Palazzo Grande at 54660 Van Dyke Ave.

"I'm a friend of his, and I remember him, although he might not remember me, from when he came in to Michigan in 2010," said Clark, the Michigan Faith and Freedom Coalition president.

"We talked to him about doing something last October when they had the debate at Oakland University, but that fell apart. So this is something we've been working on for a couple months."

Clark said the event is not ticketed, which means that all are welcome and there is no charge for admission. Doors open at 10:30 a.m. with Santorum, who also won the Iowa caucus Jan. 3, set to speak at 11:15 a.m.

"There are not enough hours to reach out to everyone, but we have wide arms and open doors," Clark said of the open invitation to all interested parties.

"We want to have a big impact on the Michigan presidential primary," Clark added. "And we want people out hearing from a presidential candidate — the leading presidential candidate."

Santorum's wins Feb. 7 gave him 71 delegates, placing him second to Mitt Romney, who has 105 delegates after winning primaries in New Hampshire, Florida, Maine and Nevada.

"Last night, clean sweep victories in Minnesota, Colorado and Missouri were nothing short of stunning," Santorum said in a post on his website Feb. 8.

"Overnight we have changed the race for the (presidency). But it wasn't just a big win for our campaign — it was also a huge win for conservatism and the tea party movement."

Santorum to speak Friday at Shelby Township event

The Michigan primary, which will dictate the votes of 30 delegates, takes place the same day as Arizona and its 29 delegates.

Along with the Troy-based Michigan Faith and Freedom Coalition, Santorum's appearance is co-sponsored by the Macomb County Republican Party, Metro Detroit Freedom Coalition Tea Party, Romeo Area Tea Party and the Southeast Michigan 9.12 Tea Party.

"None of the groups are endorsing him, but a lot of the individual leaders have and I have," Clark said of Santorum, a former U.S. senator from Pennsylvania. "He's a friend and a great American."

You can reach C & G Staff Writer Brad D. Bates at bbates@candgnews.com or at (586) 498-1029.

Source URL: <https://www.candgnews.com/news/santorum-speak-friday-shelby-township-event>

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Enclosure 2

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Could Rick Santorum Really Win Michigan?



DAVID TAINTOR - FEBRUARY 14, 2012, 6:18 AM

5333

Mitt Romney isn't supposed to lose Michigan.

With deep personal ties to the state, a father who was once its governor, and a campaign-saving win here in 2008, Michigan has always been pretty good to Mitt.

But two weeks out from the 2012 primary, polls show a resurgent Rick Santorum taking control — portending the once unthinkable for Team Romney.

It's a familiar story line: Romney has continued to have trouble connecting to conservative Republican primary voters, nowhere more so than in midwestern industrial states like Michigan.

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Still, Romney's campaign and its supporting super PACs remain more organized and better financed than his rivals. But while Romney has the money to bury Santorum in a deluge of negative advertising, does he actually have an attack message that can draw blood?

"[He] has all the momentum in Michigan right now," said Dean Debnam, President of Public Policy Polling, of Santorum's current position in the state. Jim Thienel, chairman of the Oakland County Republican Party, one of Michigan's largest counties, said Michigan voters see Santorum as a "fresh face" in the GOP field with a message that's "starting to resonate."

It doesn't hurt that Santorum's message hasn't been overwhelmingly negative, Thienel added. "People enjoy the fact that he's not going negative." Still, "We'll see when the guns turn in (Santorum's) direction," Thienel said.

And it's that gun battle that will decide what happens in Michigan. Unlike in his surprising win in Colorado last week, Santorum now has a huge target on his back. To pull off a win in Michigan, he has to fight Romney on the air, said Arthur Lupia, a political science professor at the University of Michigan. "If you see Santorum ads, he has a chance," Lupia told TPM. "If you don't, it's very unlikely he'd pull off (a win)."

Norm Shinkle, chairman of the Ingham County Republican Party isn't convinced that the polls really show Santorum has a chance, calling his surge a "political pendulum type of thing." "I like them both," Shinkle told TPM. But Romney would have to "shoot himself in the foot" to really set off a sustained Santorum surge there, Shinkle added.

Santorum's campaign did not respond to multiple requests for comment on their strategy in Michigan going forward. But Glenn Clark — a member of Santorum's team in Michigan and head of the Faith and Family Coalition in Michigan — said the former senator is able to go "toe to toe" with Romney.

If Santorum continues to poll well, it's easy to imagine Romney stepping up the attacks. If Santorum were to eke out a win, it would deal a devastating blow to Romney's bruised campaign. He'll be relying on people like Clark to help him get there.

"The whole race changes after a Santorum win in Michigan," Clark said.

Evan McMorris-Santore contributed reporting.

Michigan, Mitt Romney, Rick Santorum



David Taintor

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David Taintor is the Front Page Editor at TPM, where he contributes to TPM's Livewire coverage, among other areas. David is from Chanhassen, Minnesota, where, yes, it gets very cold. Reach him at [taintor \[at\] talkingpointsmemo.com](mailto:taintor@talkingpointsmemo.com)

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Enclosure 3

September 28, 2012

Republican Committee of Northern Macomb County

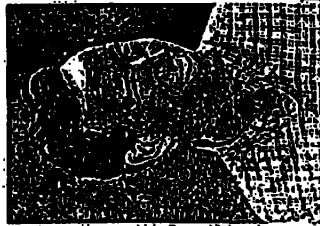
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Road to Victory Rally '12 Featuring Senator Rick Santorum

February 14, 2012 By [Rob Montilla](#) [Leave a Comment](#)



Date: Friday, February 17, 2012, 10:30 a.m.

Location:
Palazzo Grande, 54660 Van Dyke Avenue, Shelby Township, MI

Donation: Complimentary

[Click Here for a Printable Flyer for the Event](#)

Event Information:

Road to Victory Rally '12 Featuring Senator Rick Santorum - Republican Committee of Northern Macomb County Republican...

**MICHIGAN FAITH & FREEDOM COALITION
ROAD TO VICTORY RALLY '12**

—Featuring—
SENATOR RICK SANTORUM
Fighting for Faith, Family & Freedom

Friday, February 17th
Doors open - 10:30 AM
Rally begins - 11:15 AM

Complimentary event, bring friends & cameras

THE PALAZZO GRANDE
Banquet & Event Center
54660 Van Dyke Avenue (south of 25 Mile Road)
Shelby Township, Michigan

Senator Santorum will take questions from the audience.

Notice: Family-friendly placards/signs only. We reserve right to prohibit questionable material.
Stay updated on Road to Victory Rally '12 at: www.michiganffc.com

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---Featuring---

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Enclosure 4

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Evangelicals spread the gospel of Rick Santorum in blue-collar Michigan

Santorum has a working-class appeal to go with his faith – and that has made him the favourite in Mitt Romney's home state



Paul Harris in Grand Rapids, Michigan
guardian.co.uk, Thursday 16 February 2012 15:57 EST



Rick Santorum's popularity has seen him catapult into the lead in Michigan – a state Mitt Romney had been favourite to win. Photograph: James Fassinger

Outside a Christian store in the middle of a maze of suburban strip malls, Grace Rozelle has no doubt about what matters to her in the Republican primary battle for Michigan.

"Abortion is the really big thing for me. It has always been extremely important because of my faith," explained the 69-year-old retired schoolteacher. "I love Jesus and he created all of us."



Rozelle was standing on the outskirts of Grand Rapids, just a few streets away from the Mars Hill Bible Church, an evangelical mega-church built out of a converted shopping mall. Such displays of religious conviction are usually not seen as vital to Michigan's political landscape, which is more typically dominated by heavy industry and struggling city economies like Detroit and Flint.

But Rick Santorum is changing all that.

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The former Pennsylvania senator has surged into contention in the 2012 race on the back of a stunning hat-trick of victories in Missouri, Minnesota and Colorado. He has banded together religious conservatives and Tea Party supporters, creating a powerful challenge to frontrunner Mitt Romney in national polls. It has also seen him catapult into the lead in Michigan, a state that only weeks ago Daimler-born Romney assumed was virtually guaranteed. One Michigan poll had Santorum ahead by 15 points, and the last four surveys all show him maintaining a lead.

Now if Santorum can beat Romney in Michigan on February 28, he would deal a hugely damaging blow to the former Massachusetts governor's campaign, and achieve something few experts ever believed possible: become a real contender for the Republican nomination. "It is absolutely going to be a competitive race in Michigan now," said Stu Sandler, a top Republican strategist in the state.

Santorum's surge in Michigan is in many ways based around Grand Rapids, Michigan's second biggest city and a regional centre for evangelical Christians. "In Grand Rapids it is hard to throw a rock and not hit a church," said Professor Kevin Dan Dulk, a political scientist at Calvin College, a local Christian university. Indeed, Roselle isn't the only one in the area who places a great deal of importance on religion in politics. In 2008, 39% of Michigan voters in that year's Republican primary identified themselves as evangelical.



Inside the Christian store where Rozelle was doing some shopping, the manager, Jason Blik, 30, says his faith helps inform everything from abortion to foreign policy. "As a person of faith I believe Israel is very important," he said. "If it comes to a choice between Mitt Romney and Rick Santorum, I am edging towards Santorum, but I still need to do some more research."

Outside Grand Rapids, western Michigan stretches away in counties like Kent, Kalamazoo and Ottawa that are the Michigan's evangelical heartland. Far from the blue-collar, heavily Democrat parts of the state, this is red state America. The head of Ottawa County's Republican party, local attorney Adam Tountas, believes Santorum can beat Romney. "Santorum has a chance. It is easily foreseeable to think that either of them could win this," he said.

Santorum's core appeal is aimed solidly at the Republican party's evangelical foot soldiers. Santorum wears his faith on his sleeve, touting his lifelong devotion to Roman Catholicism, staunch anti-abortion beliefs, happy marriage and seven children. Romney's Mormon faith, on the other hand, is seen by some as a fringe religion, and hampers him in his outreach to the community. But for Santorum it comes easily and in straightforward language. In a speech to the Detroit Economic Club in the downtown of America's car capital, Santorum appealed to a lunch meeting of local businessmen for the country to get back to simple values. "We have to create a culture consistent with the values of our country ... believing in freedom, faith and family," he said.

In order to cement support with Christian voters in the state, Santorum's campaign quickly signed up influential Michigan social conservative Glenn Clark, head of the state's Faith and Family Coalition. "We have a tremendous network of people who are going to come out. The evangelicals I am talking to about a month ago were spread out all over the map. Now they are concentrating and being drawn to Rick Santorum," Clark told the Guardian.

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Clark pointed out that a recent political row over some religious organisations having to provide contraception as part of President Obama's healthcare coverage had boosted the Santorum campaign by putting social issues back into national US politics. "We see the onslaught against our religious liberties from Obama. Evangelicals know Rick Santorum will be a fighter for our rights in Washington," Clark said.

God and mammon

But faith voters alone will not win Michigan. Santorum also needs a convincing economic message. Michigan, with its manufacturing base having endured decades of decline, is job-hungry, and Santorum needs to prescribe solid economic medicine amid the faith healing. But, unlike the wealthy Romney, Santorum has working-class roots in the Pennsylvania coal country and strikes a populist tone. He portrays himself as the ordinary man-in-the-street that Romney cannot. "Santorum is a working-class guy who can speak the language, whereas Romney is someone seen as born with a silver spoon in his mouth," said Dan Dalk, the Calvin College professor.

It is an overlooked part of Santorum's appeal. In Detroit, Santorum spoke emotionally of his childhood in a working-class family descended from Italian immigrants. "My grandfather was a coalminer. I knew that was our wealth. It was not great wealth, it was not opulent wealth, but it allowed folks to sustain families," he said. Santorum went on to explain economic policies that imagine cutting corporate taxes and simplifying regulation while slashing away at welfare benefits. But he also put a stress on boosting manufacturing, saying he will remove all corporate taxes on US manufacturing firms.



Santorum needs to talk jobs because in terms of social issues, such as abortion and gay marriage, there is little real policy difference between the main Republican candidates. That actually allows other issues to come through for the religious base. On the Calvin College campus, it was easy to meet evangelical voters. But they had a wide range of concerns. Student Darrin Cornelius, 20, who is the fifth generation of his devout family to go to Calvin, is a fan of Ron Paul's economic ideas. "Morals are important to me. But I am not going to nor vote for someone because I don't share their religious background," he said. Even Tauntas – the attorney in evangelical-heavy Ottawa county – said the economy was the biggest issue. "The economy is the No 1 factor in our politics at the moment," he said.



Back at Calvin, however, Jeremy Smith, 19, who is studying communications, paused between classes and said he was likely to cast his first ever vote in the Republican primary. He did not yet know whom for. "It is in God's hands," he said.

But no one in the Santorum campaign is taking it quite that for granted. They know that if they can pull off a win in Michigan, it would tear a huge hole in Romney's stance as the frontrunner. But he will need to blend God and Mammon to come up with a heady mix of faith and wealth creation.

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In his speeches, he already links family values directly with a healthier economy and a smaller government. "Unless we have strong families and strong communities we are not going to be an economically successful country," he said in Detroit. If that blended message starts to take off with voters could Santorum actually win on Romney's home turf?

"Sure he could," said Den Dulk.

• *Photographs by James Fassinger*

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Enclosure 5

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Public Event · By Michigan Faith & Freedom Coalition

Friday, February 17, 2012 12:00pm until 1:30pm

MICHIGAN FAITH & FREEDOM COALITION

ROAD TO VICTORY RALLY '12

—Featuring—

SENATOR RICK SANTORUM

Fighting for Faith, Family & Freedom

Friday, February 17th

Doors open - 10:30 AM

Rally begins - 11:15 AM

Complimentary event, bring friends & cameras

THE PALAZZO GRANDE Banquet & Event Center 54660 Van Dyke Avenue Shelby Township, Michigan

Senator Santorum will take questions from the audience.

The event is also sponsored by: The Macomb County Republican Party, MEDEFCD Tea Party & the Romeo Area Tea Party. Welcome fellow patriots!

Notice: Family-friendly placards/signs only. We reserve right to prohibit questionable material.

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Michigan Faith & Freedom Coalition

WOW! Several journalists reported that we had 1500 people today at our Road to Victory Rally '12 with Rick Santorum. Huge & successful event planned and executed in three days. Thank you team for all you do for the cause.

February 17 at 12:22pm

Carolyn Wegener and Mike Kudza like this.



Gena Kapral Helmstetter

WOULD LOVE TO BE THERE BUT I AM OUT OF TOWN!

February 17 at 5:53am



Michigan Faith & Freedom Coalition

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Find local businesses, view maps and get driving directions in Google Maps

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February 16 at 7:17am



Shari Drake

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February 15 at 6:47pm



Jack McGrath

The most electable candidate!

February 15 at 9:38pm

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Enclosure 6

Editor [Adam Ryan](mailto:Adam.Ryan@hartlandpatch.com) Adam.Ryan@hartlandpatch.com



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Elections

Rick Santorum: Turn Away from 'Snobbish Elite'

Presidential hopeful Rick Santorum told about 1,500 people at a packed rally in Shelby Township that the country is relying on Michigan to step forward and pick the best GOP candidate during the February primary elections.

By [Marina Craschile](#) | [Email the author](#) | February 17, 2012

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All eyes were on Shelby Township on Friday as the Republican presidential candidate Rick Santorum addressed a full house at [Palazzo Grande](#) just after 11 a.m.

Santorum was the keynote speaker at the Michigan Faith and Freedom Coalition's "Road to Victory Rally '12" forum.

Santorum told the crowd of about 1,500 people that even though he's not from Michigan, his blue-collar ties run deep. He said his grandfather came to Detroit to work in the auto industry before he was laid off and returned to Pennsylvania to work in the mines.

The former Pennsylvania senator and competitor [Mitt Romney](#) have been touring Michigan the past few days in hopes winning over voters before the Feb. 28 primary election.

"Your country needs you to step forward here in Michigan," Santorum said. "First, to make sure we have the right candidate in the general election. Secondly, to be that elite that stands up, like Pennsylvania, and turns away from big government and the snobbish elite that believes they know best for you."

"That's your choice," he said. "What does Michigan have to say?"

Santorum addressed a variety of topics from health care to income inequalities in America, and he also stated his stance on Iran.

The GOP hopeful said President Barack Obama's health care plan is what pushed him into the presidential race in the first place.

"Obamacare. That's the reason I'm here. Karen and I are very blessed. We've been married for 21 years and have 7 children ages 20 to three and a half. Frankly, the last thing I should be doing is running for president right now. My wife reminds me every once and a while," he joked.

But in all seriousness, Santorum said he and his wife thought about what their children's lives would be like in a county where the government tells you what access to health care you will have.

Santorum stressed that America's forefathers left the oppression of Europe to start a new country based on a bottom-up approach, rather than a top-down.

"We didn't believe in class warfare then," Santorum told the crowd. "We believed in everybody's ability to rise. We didn't talk about income inequality, we talked about opportunity, because that's what America is all about, not making everyone even, but giving everybody the opportunity."

Santorum criticized Obama's dealings with heightened nuclear concerns and a potential Israeli strike on Iran.

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Rick Santorum: Turn Away from 'Snobbish Elite' - Hartland, MI Patch

"Now we're seeing this Arab spring turn into a very cold and dark winter and it's going to get worse as the president sits on the sidelines and allows Iran to get that nuclear weapon and they will do nothing. How do I know that? Because when Israel was contemplating doing what needed to be done, the president revealed that information to the world, ostracized them and held them up for scorn," said Santorum.

Shelby Township Trustee Michael Flynn, who led the crowd in the Pledge of Allegiance, said Santorum's comments on Iran and economic issues resonated with him.

However, Santorum's message didn't connect with all crowd members.

"I feel like I've heard it all before from different candidates. It sounds like he's basically saying the same thing as everybody else. It all sounds good until something actually happens," said Christina Consolino of Macomb Township.

Ultimately, Consolino said she came to find out how Santorum's plans for America would affect her life.

At the end of the day, Consolino told Patch she plans on voting for Obama, just as she did in 2008.

"My life has been better with Obama than the Bush days," she added.

Pat Skibinski of Washington Township said she has not made her decision on who to vote for yet, but she highly respects Santorum's opinions on family, trade with China and the auto bailouts.

Although 11-year-old Nick Sinista of Macomb Township, who attended the rally with his mother and 8-year-old brother, can't cast his vote for a few more years, Santorum has already won over his heart.

"I like his Christianity and his faith," he said.

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The Oakland Press (theoaklandpress.com), Serving Oakland County

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'Michigan can set this race on its ear,' Santorum tells Macomb County

Friday, February 17, 2012 7:49 PM EST

By Chad Selweski

For The Oakland Press

chad.selweski@macombdaily.com; @cbsnewsman

Sensing that he's on the verge of a game-changing primary victory, Rick Santorum told a huge crowd in Shelby Township today that "Michigan can set this race on its ear."

The former Pennsylvania senator, addressing an enthusiastic, tea party-sponsored rally at the Palazzo Grande banquet center, asserted that he will be a stronger Republican candidate in a November general election against President Obama in pivotal states such as Michigan, Ohio, Indiana, his home state of Pennsylvania, and Iowa, where his year-long, plodding campaign made him "an honorary Iowan."

"You have an opportunity to speak loudly," said Santorum, who is leading native son Mitt Romney in all the Michigan polls. "What ... this race comes down to is, what kind of country do you want to give to your children?"

Seemingly relaxed and upbeat, Santorum never mentioned Romney by name, but he blasted President Obama's health care reforms, claiming they will create a new state of dependency in America that may never be reversed.

About half of American workers pay no federal income taxes and nearly 50 percent of Americans now receive some form of government assistance. Once "Obamacare" is fully implemented, he said, all of America will become dependent on Washington.

"You will be dependent on them for your health and welfare. And they will force you to pay tribute to whatever they want from you," Santorum told the standing-room-only crowd of 1,500.

"They ... will say, 'Just give us your money. Just give us your choices. And we will provide for you.'"

Disparaging the "snobbish elite" in Washington and contrasting the "class warfare" between rich and poor propagated by the White House, he said a Santorum presidency would stand for freedom, opportunity, lower taxes and smaller government.

But the ex-senator saved his harshest words for the leaders of Iran, insisting that they should never be allowed to gain access to nuclear weapons. The Arab Spring has become a "dark and cold winter" in which Iran's theocratic regime will attempt to dominate the Middle East and terrorize Israel, said Santorum, who also served in the U.S. House.

He said Iran facilitated the death of 100,000 of its children acting as mine sweepers during the Iran-Iraq war of the 1980s, and the government's lack of respect for human life would make a nuclear-armed Iran a menace for the entire

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'Michigan can set this race on its ear,' Santorum tells Macomb County - The Oakland Pres...

globe.

"This is a corrupt, sick regime in Iran. They're values are not freedom and not opportunity, it's martyrdom," he said.

With just a couple days' notice, the Santorum event, sponsored by local tea party groups and a family values organization, managed to pack the Palazzo Grande with an overflow crowd that included hundreds standing along the walls or sitting on the floor.

Santorum received big applause when he mentioned the tea party and when he acknowledged in the crowd tea party favorite Janice Daniels, the new Troy mayor who is facing a possible recall for her controversial statements.

Dennis Nowicki of Troy said the Santorum speech sewed up his vote for the primary.

"I was leaning in that direction," he said, adding that he appreciated Santorum's message about "our Founding Fathers, which we have all seemed to forget about today."

Mike Duvall of Harrison Township, who plans to vote for Romney, said he has no disputes with Santorum on the issues.

"I think he's a rookie still. He sounds like it. A lot of generalizations," he said. "So, great substance and character - just not there yet."

Bill Hollister, director of the St. Clair Shores based tea party group known as the Metro Detroit Freedom Coalition, or MEDEFECO, said he found the senator's remarks "very inspiring."

Dressed in a star-spangled shirt made from an American flag, Hollister said, "If you took note, he was not trashing (competing GOP) candidates, most of the speaking was about substance, the ways and means of what this country was designed to be."

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TRIBLIVE

Michigan pivotal for GOP front-runners

By Salena Zito
TRIBUNE-REVIEW

Published: Saturday, February 18, 2012

Just days after Rick Santorum vowed to "plant a flag" in Mitt Romney's home state of Michigan, the former Pennsylvania senator's campaign strategist backed away from predicting a big win in that Republican presidential primary on Feb. 28.

And as political experts await the next big contest -- followed by Super Tuesday on March 6 with 10 states, including Ohio -- they're pondering whether polling numbers that show Santorum leading or running neck-and-neck with Romney, the former Massachusetts governor, truly indicate that this has become a two-man Republican race.

"We are going to be very competitive in Romney's backyard," Santorum's senior strategist, John Brahender of Pittsburgh, told the Tribune-Review on Friday. "But we are also focusing on five other states at the same time, including Ohio. Michigan's delegates are divided out in congressional districts, which gives Rick an opportunity to score some points out in the western part of the state."

Michigan became the unlikely ground zero in the primary election calendar after Santorum snagged victories in three states on Feb. 7. With 30 delegates to the Republican National Convention at stake, this primary could test more than the party choice because registered Republicans, Democrats and independents can vote on the GOP ballot.

Arizona also holds its winner-take-all contest for 29 delegates on that day.

"Santorum got a huge boost from his hat-trick wins in Missouri, Minnesota and Colorado," said Oakland County Executive L. Brooks Patterson in Pontiac, Mich., considered part of the Detroit metropolitan area. Yet Patterson predicts Romney, the son of a popular Michigan governor who grew up in Oakland County, will win the state by demonstrating "leadership and seriousness in running the country."

Patterson said Santorum "underestimates Romney's appeal in this state with conservatives. There is an energy that he does not understand."

A telephone poll of 500 likely primary voters conducted Feb. 11-13 for The Detroit News showed Santorum leading Romney 34 percent to 30.4 percent, a spread within the margin of error of 4.4 percentage points. Former House Speaker Newt Gingrich placed third with 11.6 percent, Rep. Ron Paul of Texas tallied 8.9 percent, and 12.4 percent were undecided.

In Ohio, a Rasmussen poll of Republican voters released on Thursday showed these results in the four-way matchup: Santorum, 42 percent; Romney, 24 percent; Gingrich, 13 percent; and Paul, 10

About Salena Zito

Tribune-Review Staff reporter Salena Zito can be reached via e-mail or at 412-320-7879.



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Republican presidential candidate Rick Santorum speaks to the media at the Ohio Statehouse in Columbus, Ohio, on Friday.

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percent. That survey found 55 percent of voters expect Romney to become the eventual nominee, compared with 26 percent who think the party will nominate Santorum.

Santorum yesterday received the endorsement of Ohio Attorney General Mike DeWine, a former U.S. Senate colleague who lost his bid for re-election in 2006, when Democrat Bob Casey beat Santorum in Pennsylvania. Ohio's popular Sen. Rob Portman has endorsed Romney; Gov. John Kasich, a Pittsburgh native, has not endorsed.

Romney's campaign in Michigan is lean and battle-tested, say people familiar with it. He won the Michigan primary in 2008 after bruising losses in Iowa and New Hampshire to former Arkansas Gov. Mike Huckabee and to the eventual nominee, Sen. John McCain of Arizona.

With no headquarters or call centers, Santorum's Michigan campaign lacks a hub to manage grassroots, get-out-the-vote volunteers.

Glenn Clark, a staunch social conservative in Troy, Mich., is Santorum's state political director. He would not speak for the campaign but said that as a supporter and president of Michigan Faith & Freedom Coalition, many of Santorum's supporters there are "Tevangelicals," a blend of Tea Party activists and evangelical Christians. He believes they'll be a difficult force for Romney to overcome.

"If Santorum can win in Michigan, it could derail Romney," said Michael Traugott, a political science professor at the University of Michigan in Ann Arbor.

Romney has the backing of Republican Gov. Rick Snyder, who won office during the Tea Party-inspired sweep of elected offices nationally in 2010. Favored by "establishment Republicans," Romney has sought to make inroads with Michigan's Tea Party crowd.

Douglas Koopman, a political science professor at Calvin College in Grand Rapids, Mich., categorizes the state's GOP primary voters this way: upper-class "country club" folks in Detroit's wealthier suburbs; "faith voters" living primarily in south and central Michigan; and those in the "outstate," Tea Party strongholds in rural areas.

Koopman predicts Romney will do well in the Detroit suburbs and Santorum will gain voters in the western and outstate regions.

With the number of candidates who pulled close to — then fell back from — Romney's front-runner status, Bruce Haynes, a Republican consultant at Washington-based Purple Strategies, is "increasingly convinced that this is no longer a race between Mitt Romney and other candidates."

"This primary has become a vote of confidence on Romney's candidacy, and the other candidates' primary role is to serve as vessels of expression for the 'no-confidence' vote," Haynes said.

A good indicator to predict the outcome of a state's primary is its percentage of evangelical voters, said Kyle Kondik of the Center for Politics at the University of Virginia in Charlottesville.

"Generally, Romney does better when the number is lower," Kondik said, noting that 2008 exit polling put the percentage in Michigan at 39, about the same as Florida's 40 percent.

"That means that Romney should be able to do well in Michigan against the more conservative-seeming Santorum, but he's likely going to need an ad blitz similar to what he unleashed in Florida," Kondik said. "Taking (down) Newt Gingrich was one thing; taking down Santorum might be more difficult."

Additional Information:

Michigan's primary

The Feb. 28 Republican primary is open to registered Democrats, Republicans and independents.

Among Michigan's 9.8 million residents, 7.3 million are registered voters, and 650,776 voted in the 2008 Republican primary.

Under a new state law, a voter's party choice will become public information.

The state distributes its 30 delegates to the Republican National Convention proportionally throughout the 14 congressional districts, awarding two per district and two additional delegates to the overall winner.

To win the GOP nomination, a candidate needs 1,144 delegates.

Mitt Romney has 123 delegates; Rick Santorum, 72; Newt Gingrich, 32; and Ron Paul, 19.

Source: Tribune-Review research

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Romney's organizational strength helps in Michigan

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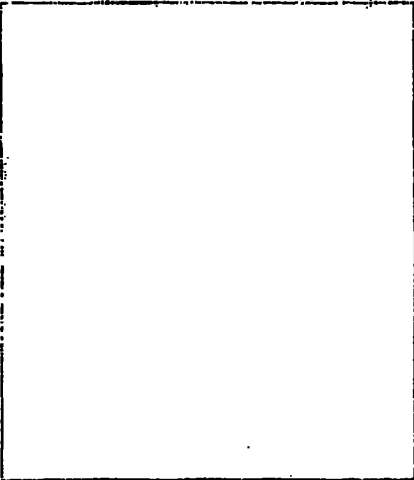
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MUSKEGON, Mich. — The standing-room-only crowd crammed into a Holiday Inn conference room in this industrial city roared with approval as Rick Santorum served up applause lines on why Michigan Republicans should choose him, not native-son Mitt Romney, as the GOP presidential nominee. Santorum's message, heavy on religious values and contempt for bailouts, was perfect for an audience in this stronghold of ardent conservatism and tea party sentiment.



But Santorum's campaign couldn't fully capitalize on the moment, revealing a shortcoming that Romney hopes will help him win Tuesday's primary despite the surging enthusiasm and favorable poll numbers for his chief opponent.

Santorum's campaign organization is so sparse in Michigan that no one was available to collect the names and email addresses of the people streaming out of the hall after the speech, a practice that's a staple of political organizing and get-out-the-vote efforts. By contrast, Romney has a deep and experienced organization working in every corner of the state. Seven of Michigan's nine Republican congressmen have tapped their campaign networks to help Romney put out calls, set up events and harvest donors.

"Mitt has a great advantage as far as having boots on the ground," said Jim Thlenel, GOP chairman in Oakland County, an affluent area where virtually the entire Republican party apparatus is part of the Romney campaign.

In this contest of organization against momentum, Romney is pushing for the resounding victory that will bolster his position as the GOP front-runner. A strong showing by Santorum in the state where Romney grew up and where Romney's father, George, was governor would underscore that the race is still an open contest.

Politically, Michigan is divided between the urban southeastern area around Detroit, where corporate executives such as the Romneys long have dominated party affairs, and the more

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Romney's organizational strength helps in Michigan - Kingsport Times-News

rural and small-town regions in the west and north, where Christian evangelism and anti-government fervor abound.

In the urban business arena, Romney's support is overwhelming. His finance committee is headed by the state's leading business executives, from John Reinke, chairman and CEO of construction giant Walbridge, to Quicken Loans founder and Cleveland Cavaliers owner Daniel Gilbert.

Romney's background as head of a venture capital firm and his emphasis on job creation and tax reduction resonate loudly here.

His connections in the state party leadership are pervasive. He has collected the endorsements of Gov. Rick Snyder and all of Michigan's top legislative leaders.

In recent weeks, organizers have summoned hundreds of Romney volunteers to hotel conference rooms to hear pep talks from top campaign officials and get their campaign assignments. Volunteers were signed up to drive voters to the polls and shown how to tap into the Romney campaign's high-tech phone tree so they could urge their friends to vote.

The list of elected officials enlisted to work with the Romney campaign goes on for more than four pages. The core of Santorum's campaign is largely two people: Glenn Clark, a conservative activist from the Detroit suburb of Troy who has headed the Michigan Faith and Freedom Coalition, and John Yob, a strategist from Michigan who worked for Herman Cain until Cain suspended his campaign. Santorum hasn't released the names of prominent Michigan supporters.

But Santorum's victories this month in Minnesota, Missouri and Colorado have excited conservatives in rural Michigan who are attracted by his religious fundamentalism and blue-collar roots as the grandson of a coal miner.

Michigan also is home to more than 50 tea party groups. Even with little help organizing his rallies, Santorum has been able to bring out large crowds to hear his attacks on Romney's support for the federal issue of closing Wall Street firms and his abortion rights position when he was governor of Massachusetts.

"I see Mitt Romney as more of a politician who has flip-flopped on some issues," said Hal Sisson, a 57-year-old media consultant from Norton Shores near Muskegon who, like Santorum, has seven children. "Rick Santorum has repeatedly been very conservative and has always stuck by his principles."

At the final stop of a recent campaign swing through Grand Rapids, however, the weaknesses of Santorum's campaign were apparent. He was given only 10 minutes to speak at an event at which Virginia Gov. Robert McDonnell, a Romney surrogate, was the keynote attraction.

Even in the most conservative areas, Romney's organization has brought in major donors. Romney has raised \$1.62 million in Michigan to Santorum's \$42,385, according to data released last week by the Federal Election Commission.

Santorum doesn't have campaign offices in any of the state's congressional districts where supporters can get information or help out with phone banks. A lot of Santorum backers instead are reaching out through their email and social media networks to spread the word about him, Clark said.

Romney can draw some comfort from Michigan's 2008 GOP presidential contest, which he won by 9 percentage points. Polls showed Romney and Arizona Sen. John McCain locked in a close contest, but Romney's strong organization prevailed against a much weaker McCain operation.

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