FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	LRA 1163
Madison Project, Inc.	)	
	)	

STATEMENT OF REASONS OF
COMMISSIONER SHANA M. BROUSSARD AND VICE CHAIR ELLEN L. WEINTRAUB

The Federal Election Campaign Act, 52 U.S.C. §§ 30101-45 (the "Act"), and Commission regulations require political committees to file periodic reports disclosing their receipts and disbursements, including independent expenditures.[1] The Act and Commission regulations further require that political committees disclose independent expenditures within 24 hours of the expenditure when a person makes or contracts to make independent expenditures aggregating $1,000 or more after the 20th day but more than 24 hours before the date of an election.[2] Further, a political committee that makes or contracts to make independent expenditures aggregating $10,000 or more outside of that 20-day period, up to and including the 20th day, prior to the election must file a report disclosing those expenditures within 48 hours.[3]

The Act and Commission regulations define "independent expenditure" as an expenditure for a communication that expressly advocates for the election or defeat of a clearly identified candidate not in coordination with a candidate, party committee, or one of their agents.[4] A communication constitutes express advocacy if it contains "individual word(s), which in context can have no other reasonable meaning than to urge the election or defeat of one or more clearly identified candidates."[5] A communication is also express advocacy if it can only be interpreted by a reasonable person, when taken as a whole and with limited reference to external events, such as the proximity to the election, as advocating for the election or defeat of one or more clearly identified

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1 52 U.S.C. § 30104(a).

2 52 U.S.C. § 30104(g); 11 C.F.R. § 109.10(d).

3 52 U.S.C. § 30104(g); 11 C.F.R. § 104.4(b)(2).

4 52 U.S.C. § 30101(17); 11 C.F.R. § 100.16; 11 C.F.R. § 100.22(a)-(b).

5 These include phrases such as "vote for the President," "re-elect your Congressman," "support the Democratic nominee," "vote Pro-Life" or "vote Pro-Choice" followed by a listing of clearly identified candidates described as Pro-Life or Pro-Choice, or communications of campaign slogan(s) or words "such as posters, bumper stickers, advertisements, etc. which say 'Nixon's the One,' 'Carter '76,' 'Reagan/Bush' or 'Mondale!'" 11 C.F.R. § 100.22(a).

candidate(s), because: "(1) [t]he electoral portion of the communication is unmistakable, unambiguous, and suggestive of only one meaning; and (2) [r]easonable minds could not differ as to whether it encourages actions to elect or defeat one or more clearly identified candidate(s) or encourages some other kind of action."[6]

Historically, it has not been controversial that a communication that constitutes both express advocacy and a solicitation is an independent expenditure. In the past decade, the Commission has approved findings in six audits of nonconnected committees related to reporting costs of fundraising solicitations as independent expenditures.[7] Recently, however, some commissioners have adopted the position that a communication that solicits a contribution to a nonconnected committee cannot be an independent expenditure, even though it contains or consists of express advocacy.[8]

Last year, during an audit of the Madison Project, Inc. ("the Committee"), a nonconnected political committee, the Commission's Audit Division indicated that it was planning to propose a finding, "Reporting of Independent Expenditures," that would categorize some of the Madison Project's fundraising communications referencing candidates for President, the U.S. House of Representatives, and the U.S. Senate as independent expenditures. The Madison Project subsequently submitted a Request for Consideration of a Legal Question, challenging the legal validity of the proposed finding. The Office of General Counsel submitted a robust factual and legal analysis to the Commission to support its recommendation in response to the Madison Project's request.[9]

The communications at issue were unambiguous in their advocacy for the election of Donald Trump and Republicans in Congress and the defeat of Democrats. In addition to asking for contributions to the Committee, the communications at issue made statements such as "President

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[6] 11 C.F.R. § 100.22(b).

[7] *See* Final Audit Report on Conservative Majority Fund at 16-17 (Dec. 6, 2017); Final Audit Report on Freedom's Defense Fund at 12-13 (Dec. 6, 2017); Final Audit Report on Conservative Campaign Committee at 5-10 (Feb. 22, 2017); Final Audit Report on TeaPartyExpress.org at 10-15 (Jan. 23, 2017); Final Audit Report on National Campaign Fund at 9, 12-13 (Oct. 12, 2012); Final Audit Report on Legacy Committee Political Action Committee at 8, 10 (July 31, 2012).

[8] *See* Certification in the Matter of Request for Consideration of a Legal Question by 21st Century Democrats, ADR Case # 1083 (Apr. 9, 2021) (splitting 3-3 on recommendation to proceed with independent expenditure audit finding for fundraising solicitations); Certification in the Matter of 21st Century Democrats – Audit Update and Rescind Authority to Audit, ADR Case # 1083 (June 27, 2022) (directing transfer of audit to Alternative Dispute Resolution, with the exception of a finding concerning fundraising communications as independent expenditures); Certification in the Matter of Rightmarch.com PAC, Inc. (LRA 842) (Apr. 7, 2011) (splitting 3-3 on recommendation to include cost of fundraising communications in independent expenditure finding, which was the subject of a Request for Consideration of a Legal Question that also split 3-3); Final Audit Report on Rightmarch.com PAC, Inc., at 13-18 (Feb. 26, 2013) (identifying independent expenditure reporting as an additional issue). During that same time period, the Commission also split 3-3 on whether a communication that solicits a contribution to a party committee can be an independent expenditure. *See* Certification, Proposed Final Audit Report on Republican Party of Minnesota (Jan. 26, 2022) (approving edit to Final Audit Report to state that some commissioners voted to not approve independent expenditure reporting finding); Certification, Audit Division Recommendation Memorandum on the Mississippi Republican Party (Jan. 28, 2021) (failing to agree by four votes to include a finding relating to the reporting of fundraising communications as independent expenditures).

[9] *See* Memorandum to the Commission in LRA 1163 (Madison Project, Inc.), dated Jan. 26, 2023.

Trump deserves four more years"; "Yes! You can count on me to support your campaign to re-elect President Trump for four more years"; "we cannot allow a 'democratic' Socialist to become president either – we absolutely must keep America great by keeping President Trump in the White House for FOUR MORE YEARS"; "it's up to us to stop Nancy Pelosi's Democrats from destroying our great country"; "Nancy Pelosi's Democrats must be defeated"; and "WE CANNOT ALLOW THESE RADICAL DEMOCRATS TO STEAL CONTROL OF THE SENATE NEXT NOVEMBER." Indeed, the Committee did not challenge Audit's position that the solicitations contained express advocacy language. Instead, the Committee argued that solicitations generally, and, specifically, solicitations to recipients outside of the district or state in which referenced candidates are seeking election, are not independent expenditures.

A majority of our colleagues were swayed by the Committee's position. In a Statement of Reasons, several of our colleagues wrote that "after carefully reviewing the text of each solicitation, *none* met the definition of express advocacy."[10] As they explain it, the basis for this position is that the communications call on the reader to give money to the Committee, rather than to vote for or against a candidate or to make contributions directly to the candidate.[11]

One of the communications cited by our colleagues as "ultimately fall[ing] short" of express advocacy consists of a four-page long letter, with a two-page contribution form attached.[12] The four-page letter doesn't mention money or contributions until page 4. The letter begins by warning that "WE CANNOT ALLOW THESE RADICAL DEMOCRATS TO STEAL CONTROL OF THE SENATE NEXT NOVEMBER."[13] It then asks for the reader's help to give two candidates, identified as "Madison Project's 2020 top-tier Senate Candidates: Captain John James in Michigan and Congressman Jason Lewis in Minnesota," "the critical boost they need to win their all-important races!"[14] The letter states that the reader's support is needed "to win their races, defeat 2 anti-Trump Democrats, and bring 2 more conservatives to Washington who will fight shoulder-to-shoulder alongside President Trump to Keep America Great."[15] The next two pages of the letter are biographies and accolades of the two candidates – approximately one page-worth per candidate.[16] When it does solicit funds, the letter states that with the reader's help, the Madison Project "can go 2-for-2 in 2020, defeat 2 liberals, and expand the impeachment-proof Senate Majority for Conservatives by helping elect John James and Jason Lewis next November."[17] Regarding the

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[10] Statement of Reasons of Commissioners Allen J. Dickerson, Dara Lindenbaum and James E. "Trey" Trainor in the Matter of the Audit of Madison Project, Inc. (LRA 1163) at 5 ("Dickerson, Lindenbaum, and Trainor SOR") (emphasis added).

[11] One mailer, sent on December 30, 2020, postdates the election and thus cannot contain express advocacy. *Id*. We agree with our colleagues on this point.

[12] Attachment 1.

[13] *Id*. at 3.

[14] *Id*.

[15] *Id*. at 3-4.

[16] *Id*. at 4-5.

[17] *Id*. at 6.

suggested $40 contribution, the letter notes that a reader can give: "$20-each [sic] for James and Lewis."[18] Lest the prior three-and-a-half pages leave any confusion, the letter finally explains that the money will "be put to good use immediately to help send 2 die-hard conservatives to Washington who will fight to stop the impeachment obsessed Democrats from destroying America."[19]

Another letter cited by our colleagues goes further: it explains *how* contributions will be used to support specific candidates.[20] After dedicating a paragraph each to the four clearly identified individuals described as "[the Madison Project's] first four endorsed 'RIGHT CALIBER OF CANDIDATES' running for the U.S. House of Representatives in 2020,"[21] the letter describes the "#1 most effective approach to win votes" as "knocking on doors, making phone calls, and listening to [] constituents."[22] Accordingly, the letter explains how the Madison Project focuses its efforts on "deploying door-knockers, setting up phone banks, and helping our right caliber candidates to mobilize their 'ground game,'" for which it must raise the "RIGHT RESOURCES."[23]

These examples are just two of the many communications sent by Madison Project in the run-up to the 2020 election; the rest follow the same format.[24] It strains belief that these communications are not expressly advocating the election or defeat of clearly identified candidates. There is no basis for the assertion that a communication that urges viewers to contribute funds for the purpose of influencing a federal election *cannot* also be an independent expenditure as a matter of law.[25] As explained above, a communication contains express advocacy if "(1) [t]he electoral portion of the communication is unmistakable, unambiguous, and suggestive of only one meaning; and (2) [r]easonable minds could not differ as to whether it encourages *actions* to elect or defeat one or more clearly identified candidate(s) or encourages some other kind of action."[26] As the Commission has explained (and our colleagues concede), "exhortations to contribute time or money to a candidate would also fall within the definition of express advocacy. The expressions

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18 *Id*.

19 *Id*.

20 Attachment 2.

21 *Id*. at 4-5.

22 *Id*. at 5.

23 *Id*.

24 Dickerson, Lindenbaum, and Trainor SOR, fn. 7-9; *see also* Dickerson, Lindenbaum, and Trainor SOR Attachments 2-4.

25 We appreciate that our colleagues state that "a committee cannot avoid the definition of independent expenditure merely by including a 'donate now' button on a communication," but their Statement provides little insight into what kind of communication comprising express advocacy and a solicitation *would* constitute an independent expenditure in their view. Dickerson, Lindenbaum, and Trainor SOR at 5. Absent any explanation of their distinction, the regulated community may conclude that our colleagues view the inclusion of solicitation language as sufficient to avoid the definition of independent expenditure.

26 11 C.F.R. § 100.22(b) (emphasis added).

enumerated in *Buckley* included 'support,' a term that encompasses a variety of activities beyond voting."[27] As the D.C. District Court has stated: "The most obvious electoral action is to vote for or against the candidate. But as the *Buckley* Court recognized when it included the verb 'support' in its non-exclusive list, express advocacy also includes verbs that exhort one to campaign for, *or contribute to*, a clearly identified candidate."[28] Indeed, the use of the plural, "actions," would not make sense if the only action covered was voting.

Our colleagues argue that exhortations to contribute time or money to a nonconnected political committee, rather than to a candidate, categorically are not express advocacy. We agree that a mere solicitation for contributions to a nonconnected committee for unspecified uses, is not, by itself, an encouragement of an action to elect or defeat a clearly identified candidate. However, where, as here, a registered political committee (which, of course, by definition has as its major purpose the nomination or election of federal candidates[29]) explicitly states that its purpose in soliciting contributions is to "expand the impeachment-proof Senate Majority for Conservatives by helping elect John James and Jason Lewis next November," it cannot be a serious argument that this is not express advocacy.

Moreover, even if "actions" was intended to refer only to the single action of voting, the regulation clearly contemplates that a communication may have more than one purpose. The regulation states that a communication contains express advocacy where "the electoral *portion* of [a] communication" is unmistakable, unambiguous, and suggestive of only one meaning and reasonable minds could not differ as whether it encourages actions to elect or defeat a clearly identified candidate.[30] The regulation does not require that the entire communication is suggestive of only one meaning (or even that the entire communication be electoral in nature). Thus, even if a statement soliciting contributions to a nonconnected political committee is not, by itself, express advocacy, nothing in the Act or Commission regulations preclude a communication from having more than one communicative purpose. Indeed, the Commission has previously taken the position that a communication that contains express advocacy but serves more than one purpose is treated as express advocacy.[31]

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[27] Express Advocacy; Independent Expenditures; Corporate and Labor Expenditures, 60 Fed. Reg. 35,292, 35,295 (July 6, 1995) ("Express Advocacy E&J") (referencing *Buckley v. Valeo*, 424 U.S. 1 (1976)). *See also*, Conciliation Agreement ¶¶ IV.24, IV. 31, MURs 5511 and 5525 (Swiftboat Veterans and POWs for Truth) (Dec. 13, 2006) (finding that the organization's fundraising communications were expenditures containing express advocacy).

[28] *FEC v. Christian Coalition*, 52 F. Supp. 2d 45, 61-62 (D.D.C. 1999) (internal citation omitted) (emphasis added).

[29] *See* Political Committee Status, 72 Fed. Reg. 5,595, 5,597 (Feb. 7, 2007) (citing *Buckley v. Valeo*, 424 U.S. at 79).

[30] 11 C.F.R. § 100.22(b) (emphasis added).

[31] *See cf.*, Advisory Opinion 2012-11 (Free Speech) at 5 (explaining that advertisements with two calls to actions—one advocating for a candidate's defeat and another advocating for contacting that candidate/office holder—satisfies the express advocacy definition because the second call to action "does not negate the fact that the advertisements contain express advocacy under 11 C.F.R. 100.22(a).").

Communications by political committees that expressly advocate the election or defeat of a clearly identified federal candidate are not exempt from being treated as independent expenditures simply because they are paired with or part of a solicitation for contributions. The Commission has concluded that a fundraising solicitation constitutes express advocacy under 11 C.F.R. § 100.22(a) when "it references an election and specific candidates, and it advocates action—in this case contributing funds—designed to lead to a candidate's defeat in the election."[32] The Committee's fundraising solicitations do this exactly.

Consistent with the Office of General Counsel's recommendation and with Commission precedent, we voted to find that the Committee's fundraising solicitations, which reference federal candidates and expressly advocate for their election or defeat, qualify as independent expenditures.[33]

This decision is an unfortunate departure from Commission precedent and in our reading in opposition to the plain reading of the law. The conclusion in the Madison Project, Inc. audit has the potential to open the floodgates to allow committees to publish express advocacy communications, tack on some cursory solicitation language, and never have to report it as an independent expenditure. This determination will not allow political committees to engage in more speech than before – independent expenditures by political committees (and others) were permissible before our colleagues' votes and remain permissible. What this decision will do is to remove a critical transparency tool to allow voters to know who is spending money on express advocacy shortly before an election. And it is the public who will lose.

May 3, 2024
Date

Shana M. Broussard
Commissioner

May 3, 2024
Date

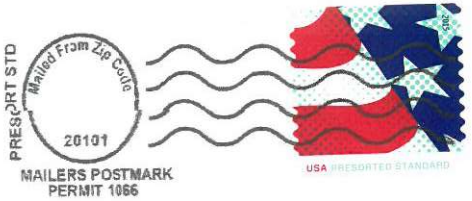
Ellen L. Weintraub
Vice Chair

[32] *See* Conciliation Agreement ¶¶ IV.24, IV. 31, MURs 5511 and 5525 (Swiftboat Veterans and POWs for Truth) (Dec. 13, 2006).

[33] Certification in LRA 1163 (Madison Project, Inc.), dated February 28, 2023.

ATTACHMENT 1

Jim Ryun
United States Congressman
1996-2007



What you as a conservative do in the next 2 days is absolutely critical.

PLEASE RETURN WITHIN

NOV 08 2019

Mrs. H. S. Pedro
20130 Lakeview Center Plz. Ste. 300
Ashburn, VA 20147-5905

JRFC TSNT01

MADISON PROJECT

Congressman Jim Ryun
Chairman

Tuesday morning

My Fellow Conservative,

I've sent you this **URGENT RED ALERT REPLY ENVELOPE** because I need your help, and I need it fast.

With Nancy Pelosi's Democrats launching official impeachment investigations against President Trump, it's a blaring **"RED ALERT"** siren for all of us conservatives.

WE CANNOT ALLOW THESE RADICAL DEMOCRATS TO STEAL CONTROL OF THE SENATE NEXT NOVEMBER.

My name is Jim Ryun and I'm the Chairman of Madison Project. As a former Olympic Athlete and a five-term member of Congress I know what it takes to win.

Hard work and devotion propelled me to 3 Olympic appearances, world records in the mile, and 5 elections to the U.S. House of Representatives.

That's why I know what happens in the next 2 days is absolutely critical.

With your help we can give two men vowing to stand-up against the "impeachment obsessed" Democrats, defend our President, and Keep America Great the critical boost they need to win their all-important races!

Both men have proven themselves to be solid all-around conservatives…they are 100% Pro-Life, Pro-Second Amendment and Pro-Taxpayer.

The two men I'm speaking of are our Madison Project's 2020 top-tier Senate Candidates:

Captain John James in Michigan
Congressman Jason Lewis in Minnesota

To win their races, defeat 2 anti-Trump Democrats, and bring 2 more conservatives to

Washington who will fight shoulder-to-shoulder alongside President Trump to Keep America Great these 2 top-tier candidates need your support now more than ever.

Before I go any further I'd like to tell you a little more about them…

ARMY CAPTAIN JOHN JAMES (RET.) IN MICHIGAN

U.S. Army Apache pilot John James is a true patriot.

After graduating from West Point and Ranger school, John went on to serve with distinction in Iraq where he logged more than 750 flight hours leading two Apache platoons and earning a Combat Action Badge (CAB) and two Air Medals.

Now he's running as a pro-life, pro-Second Amendment, and pro-business Republican in Michigan --- a state President Trump won in 2016.

His opponent is ultra-liberal Senator Gary Peters whose approval rating sits at only 33% --- making him a prime target for defeat.

Not to mention, Peters was recently ranked second to last (#99 out of 100) for his effectiveness in the Senate.

Senator Peters is the poster boy for "do nothing" politicians.

And worse still, since he's running for re-election, he's pandering to the radical left including his home state "Socialist Squad" member Rep. Rashida Tlaib.

That's right! Peters is running together with Rep. Tlaib who you probably know is the loudest and most foulmouthed anti-Trump radical in Washington. Remember, she's the Congresswoman who screamed profanities while calling for President Trump's impeachment on her first day in office.

Meanwhile, Captain John James is running with the full support and backing of President Trump.

"He has every single quality to be your next Great Senator from Michigan. When the people of Michigan get to know John, they will say he is a true star. Also, distinguished Military and a Combat Vet!"

-President Trump

With your help conservative veteran John James will make a great U.S. Senator from Michigan.

[Next page, please]

CONGRESSMAN JASON LEWIS IN MINNESOTA

Congressman Jason Lewis is exactly the kind of conservative you and I love.

Like President Trump, he's a no-nonsense kind of guy who knows how to effectively communicate his conservative message.

Before being elected to the House in 2016, Rep. Lewis was a popular conservative talk radio host who regularly filled-in for Rush Limbaugh. He's even been called President Trump's "Mini-Me."

During his brief time on Capitol Hill he made a name for himself as a strong constitutional conservative by voting to repeal ObamaCare and pass the wildly successful Trump Tax Cuts.

His opponent is ultra-liberal Senator Tina Smith whose approval rating sits at only 43% --- making her a prime target for defeat.

If you have not heard of Senator Smith, you're not alone.

She was first appointed to her seat after former Senator Al Franken resigned in the midst of a wildly publicized sexual harassment scandal in 2018.

Make no mistake: she's a radical pro-abortion, anti-Second Amendment, and pro-impeachment liberal.

"In 2020, because of America hating anti-Semite Rep. Omar, & the fact that Minnesota is having its best economic year ever, I will win the State!"

-President Trump

When asked why he's running for U.S. Senate, Rep. Lewis replied: "I refuse to sit back on the sidelines and watch our state, country, and way of life continue to come under blistering attack from radical politicians like Ilhan Omar and her foot soldier Tina Smith."

With your help conservative Congressman Jason Lewis will make a great U.S. Senator from Minnesota.

So to help send both of our top-tier conservative Senate candidates to Washington where they will fight for us I ask that you use the **URGENT RED ALERT REPLY ENVELOPE** I've sent you today to contact me immediately.

[Over, please]

Thanks to the hard work and devotion of Americans like you, Madison Project has helped elect some good conservatives over the years including: Senators Ted Cruz (R-TX) and Mike Lee (R-UT).

Today with your help we can go 2-for-2 in 2020, defeat 2 liberals, and expand the impeachment-proof Senate Majority for Conservatives by helping elect John James and Jason Lewis next November.

Please take just a few moments right now to show your support for both of these outstanding conservatives by generously supporting Madison Project with a much-needed $40 contribution.

$40 equals $20-each for James and Lewis.

Your most generous $40 contribution will be put to good use immediately to help send 2 die-hard conservatives to Washington who will fight to stop the impeachment obsessed Democrats from destroying America.

My friend, I know times might be tough this time of year.

But today is the day to invest in America's greatness. So if $40 is more than you can afford to send in right now I hope you'll consider sending $30 or at least $20.

I am asking you send in whatever you can right now because every single dollar makes a difference as Election Day fast approaches.

So please, do not delay – use the **URGENT RED ALERT REPLY ENVELOPE** I've enclosed for you today to send in your very best contribution to help Keep America Great!

Thank you in advance for your support and friendship.

God Bless.

Congressman Jim Ryun (ret.)
Madison Project Chairman

P.S. Will you help me stand-up against the "impeachment obsessed" Democrats, defend our President, and Keep America Great?

Please use the **URGENT RED ALERT REPLY ENVELOPE** to rush your reply back to me within the next 2 days.

I'll be eagerly awaiting your answer.

Personal Reply to Congressman Jim Ryun

Madison Project Chairman
Post Office Box 1017, Merrifield, VA 22116-1017

PLEASE RETURN WITHIN THE NEXT 2 DAYS

Mrs. H. S. Pedro
20130 Lakeview Center Plz. Ste. 300
Ashburn, VA 20147-5905

TSNT011
00594060288

Dear Jim,

( ) **Yes!** I will help you stand-up against the "impeachment obsessed" Democrats, defend our President, and Keep America Great.

To help you go 2-for-2 in 2020, defeat 2 liberals, and expand the impeachment-proof Senate Majority for Conservatives by helping elect John James and Jason Lewis next November I'm using the **URGENT RED ALERT REPLY ENVELOPE** you've sent me to rush back my most generous contribution in the amount of:

(__) Just like you asked, I've enclosed a $40 contribution.

That's $20-each for John James and Jason Lewis

(__) I'd like to give even more. I've enclosed a contribution for:

[ ]$80 [ ]$250 [ ]$500 [ ]$1,000 [ ]$2,000

[ ]$5,000 (maximum allowed by law)

(__) I cannot afford to send $40 but I'd still want to help. I've enclosed a contribution for

[ ]$30 [ ]$20 [ ]$_____Other

Please make checks payable to: "Madison Project" or complete the credit card contribution form on the reverse side of this page.

( ) **No!** I will not help you stand-up against the "impeachment obsessed" Democrats, defend our President, and Keep America Great.

Type of Card: ( )VISA ( )MasterCard ( )Discover ( )AMEX

Amount of Credit Card Contribution: $_____

Card Number: _____CVV:_____Expiration Date: ____ / ____ (MO/YR)

Name on Card: _____ Signature: _____

( ) Please check this box to certify this is your personal credit card not funded by a corporation.

Contributions are not deductible as charitable contributions for federal income tax purposes. The maximum an individual may contribute is $5,000. Contributions from corporations, labor unions, federal government contractors, national banks, and foreign nationals without permanent residency status are prohibited. Federal law requires us to use our best efforts to collect and report the name, mailing address, occupation and name of employer of individuals whose contributions exceed $200 in an election cycle:

Occupation: _____

Employer: _____

Don't forget to check in with us from time to time at www.MadisonProject.com to sign up for our Email Alerts and see the latest news from the campaign trail as Election Day draws closer.

E-mail Address: _____@_____

RED ALERT

Place
Stamp
Here

ATTN: Congressman Jim Ryun (ret.), Chairman

Madison Project
P.O. Box 1017
Merrifield, VA 22116-1017

TSNT01WM

ATTACHMENT 2

Rep. Jim Ryun
(R-Kansas)

PRESORT STD
Mailed From Zip Code
20706
MAILERS POSTMARK PERMIT 257

I need your help to win back 30 Republican-held seats
Nancy Pelosi's Democrats stole from us.

MAY 27 2020

Mrs. H. S. Pedro
20130 Lakeview Center Plz. Ste. 300
Ashburn, VA 20147-5905

MP WBTHpHA

602843

MADISON PROJECT

From the desk of...

Congressman Jim Ryun

Madison Project Chairman

Dear Fellow Conservative,

I need your help to win back 30 Republican-held seats Nancy Pelosi's Democrats stole from us.

Sign and return your **WIN BACK THE HOUSE** reply form using the *TRIPLE-STAMPED-ENVELOPE* I've sent you today.

During the 2018 midterm election, 30 Democrats snuck into the House by a total of just 57,000 votes. That's ONLY 1% of the vote!

These were razor-thin margins in reliably red districts.

President Trump won these same districts in 2016 and with your help we can turn them back into red districts again in 2020.

With all that's going on right now in Congress --- never ending attacks on President Trump, pointless investigations, and baseless impeachment --- we conservatives must mount a comeback.

"IF WE DON'T IMPEACH THE PRESIDENT, HE WILL GET RE-ELECTED."

Those were the exact words of liberal Congressman Al Green and it really sums up what Pelosi's Democrats are all about...

...they hate President Trump so much that facts don't matter.

Nancy Pelosi, Adam Schiff, Jerry Nadler and the rest of the "IMPEACH TRUMP" gang have turned Congress into a complete circus.

Today with your help I want to turn things around, win back 30 seats, and regain a Republican majority in the House.

My name is Jim Ryun and I'm the Chairman of Madison Project.

As a former Olympic Athlete and a five-term member of Congress I know what it takes to win. Hard work and devotion propelled me to 3 Olympic appearances, world records in the mile, and 5 elections to the U.S. House of Representatives.

With the right caliber of candidates, the right game plan and the right resources...

We will take the Speaker's gavel away from Nancy Pelosi.

We will flip 30 very winnable seats.

And we will **WIN BACK THE HOUSE** in 2020.

So please, sign your **WIN BACK THE HOUSE** reply form and rush it back to me in the enclosed *TRIPLE-STAMPED-ENVELOPE* today.

At the start of every race, Madison Project looks for the brightest and best conservatives running for office.

Solid pro-life, pro-gun owner, and pro-taxpayer Republicans.

Our first four endorsed **"RIGHT CALIBER OF CANDIDATES"** running for the U.S. House of Representatives in 2020 include:

****** DAVID HILL (OKLAHOMA-5)**

David is a dedicated father, a successful businessman, and a conservative outsider who won't go along to get along. He's not a career politician. He's a fixer, a tough negotiator, and a leader.

President Trump won this district by 13 points in 2016 and with your help top-tier contender David Hill will win it for conservatives in November 2020.

****** MICHELLE FISCHBACH (MINNESOTA-7)**

Michelle is a proven conservative leader. She recently served as the 49th Lieutenant Governor of Minnesota and before that she served in the State Senate where she earned a strong 100% pro-life and pro-gun owner record.

President Trump won this district by 31 points in 2016 and with your help Lt. Gov. Fischbach will win it for conservatives in November 2020.

****** TOM TIFFANY (WISCONSIN-7)**

Tom's a successful small business owner and current State Senator. He's worked to cut taxes by more than $13 billion, defend the lives of the unborn, and ensure our 2nd Amendment rights are protected.

President Trump won this district by 21 points in 2016 and with your help State Senator Tiffany will win it for conservatives in November 2020.

[Next page, please]

****** DAVID VALADAO (CALIFORNIA-21)**

David's a battle-tested conservative behind enemy lines in liberal California. During his time in Congress, David voted to repeal ObamaCare and to pass the wildly successful Trump tax cuts.

In 2018, the Democrats stole this district from David by only 862 votes (less than 1% of the vote) and with your help Congressman Valadao will win his comeback bid for conservatives in November 2020.

David Hill, Michelle Fischbach, Tom Tiffany, and David Valadao are the right caliber of candidates!

Now let's talk strategy or what I call the **"RIGHT GAME PLAN."**

As the old saying goes "all politics is local." During my campaigns I found the #1 most effective approach to win votes was to pound the pavement.

By that I mean going out knocking on doors, making phone calls, and listening to my constituents.

That's why over the years here at the Madison Project we've focused our efforts deploying door-knockers, setting up phone banks, and helping our right caliber candidates to mobilize their "ground game."

We can only do all of the above if we have the **"RIGHT RESOURCES."**

Thanks to American patriots, like you, our Madison Project has been able to raise the resources to elect some great conservative leaders.

We've helped elect dozens of Republicans including Senators Ted Cruz (R-TX), Mike Lee (R-UT), Marco Rubio (R-FL) and Reps. Mark Meadows (R-NC), Chip Roy (R-TX), and Jim Banks (R-IN).

So now I must ask, will you help us **WIN BACK THE HOUSE** with a $30 contribution today?

That's $1 for every one of the 30 Republican-held seats Nancy Pelosi's Democrats stole from us.

We've got the "right caliber of candidates" with rock-solid conservatives David Hill, Michelle Fischbach, Tom Tiffany, and David Valadao.

We've got the "right game plan" that's proven successful to

win election after election.

Now all we need is your financial support to give us the **"RIGHT RESOURCES"** to push our candidates across the finish line and into the winner's circle.

With that in mind would you please consider contributing $60 ($2 per seat), $90 ($3 per seat), or $150 ($5 per seat) to help take back 30 seats and **WIN BACK THE HOUSE**?

Or if you have been richly blessed to be able to give a special one-time contribution of $250, $500, $1,000, or any amount up to the legal max of $5,000 --- that would definitely help give all our conservative contenders the winning edge in November 2020.

We cannot afford two more years of Speaker Pelosi's circus.

As a father and grandfather, I'm appalled by the Democrats lack of morals and their hurtful attacks on our President and our way of life.

As a former Congressman, it pains me to watch the Democrats lie through their teeth as they seek to torpedo the Trump presidency.

And as a former Olympic athlete who proudly represented the USA, I'm saddened by the Democrats march toward Soviet-style socialism.

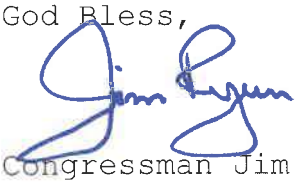
So please, join me in my mission to **WIN BACK THE HOUSE** today.

I've already paid the return postage on your *TRIPLE-STAMPED-ENVELOPE* so that nothing delays your reply back to me.

All I ask is that you give what you can to help us reclaim the 30 Republican seats Pelosi's Democrats stole from us.

Whether that's $30 or $500 or $5,000 -- please know that I am grateful for your faithful support and steadfast friendship.

God Bless,



Congressman Jim Ryun (ret.)
Madison Project Chairman

P.S. Will you help me win back 30 Republican-held seats, take the Speaker's gavel away from Nancy Pelosi, and keep America great? If so, sign your **WIN BACK THE HOUSE** reply form and send it back along with your very best campaign contribution of $30 or more using the *TRIPLE-STAMPED-ENVELOPE* I've sent you today.

602843

WIN BACK THE HOUSE

Reply to Congressman Jim Ryun

Madison Project Chairman

Post Office Box 1017, Merrifield, VA 22116-1017

Mrs. H. S. Pedro
20130 Lakeview Center Plz. Ste. 300
Ashburn, VA 20147-5905

WBTH049
00661718884

( ) Yes! I will help you win back 30 Republican-held seats, take the Speaker's gavel away from Nancy Pelosi, and keep America great. To help push our candidates across the finish line and into the winner's circle I'm rushing back my most generous contribution made in the amount of:

( ) Just like you asked, I've enclosed a $30 contribution. (That's $1 for every one of the 30 Republican-held seats Nancy Pelosi's Democrats stole from us.)

( ) I want to help send Pelosi's Democrats an even louder message. I've enclosed a contribution for:

[ ] $60 ($2 per seat) [ ] $90 ($3 per seat)

[ ] $150 ($5 per seat) [ ] $250 ($8 per seat)

[ ] $500 ($16 per seat) [ ] $1,000 ($33 per seat)

[ ] $5,000 (legal maximum)

( ) I cannot afford to send $30 but I'd still like to help. I've enclosed a contribution for:

[ ] $_____ Other - Thank You!

Please make checks payable to: "Madison Project" or complete the credit card contribution form on the reverse side of this page.

( ) No! I will not help you win back 30 Republican-held seats, take the Speaker's gavel away from Nancy Pelosi, and keep America great.

Type of Card: ( )VISA ( )MasterCard ( )Discover ( )AMEX

Amount of Credit Card Contribution: $_____

Card Number: _____ CVV:_____ Expiration Date: ____ / ____ (MO/YR)

Name on Card: _____ Signature: _____

( ) Please check this box to certify this is your personal credit card not funded by a corporation.

Contributions are not deductible as charitable contributions for federal income tax purposes. The maximum an individual may contribute is $5,000. Contributions from corporations, labor unions, federal government contractors, national banks, and foreign nationals without permanent residency status are prohibited. Federal law requires us to use our best efforts to collect and report the name, mailing address, occupation and name of employer of individuals whose contributions exceed $200 in an election cycle:

Occupation: _____

Employer: _____

Don't forget to check in with us from time to time at www.MadisonProject.com to sign up for our Email Alerts and see the latest newsw from the campaign trail as Election Day draws closer.

E-mail Address: _____@_____

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