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**MUR 7147  
Supplement**

October 14, 2020

*Submitted via email and U.S.P.S.*

Federal Election Commission  
Office of Complaints Examination  
and Legal Administration  
Attn: Mary Beth deBeau, Paralegal  
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Washington, D.C. 20463  
[CELA@fec.gov](mailto:CELA@fec.gov)

**RE: Supplemental evidence for MUR 7147**

Dear Ms. deBeau:

On October 6, 2016, Campaign Legal Center (“CLC”) filed a complaint with the Commission alleging that the super PAC Make America Number 1 (ID: C00575373) had made illegal in-kind contributions to presidential candidate Donald Trump’s authorized campaign committee, Donald J. Trump for President, Inc. (ID: C00580100). The Commission designated the matter MUR 7147. CLC supplemented the complaint on December 2, 2016 and on April 12, 2017. We write to supplement the complaint with additional evidence in the form of newly published emails and other documents from the 2016 election.

CLC’s original complaint alleged, among other things, that Make America Number 1 (also known as the “Defeat Crooked Hillary” super PAC) made unlawful and unreported expenditures

in coordination with the Trump campaign by way of the common vendor Cambridge Analytica.<sup>1</sup> The Trump campaign paid Cambridge Analytica \$5.9 million in the 2016 cycle,<sup>2</sup> and Make America Number 1 reported paying over \$5 million to Cambridge Analytica after the super PAC began supporting Trump.<sup>3</sup>

Both Make America Number 1 and the Trump campaign contracted with Cambridge Analytica for similar services—such as developing the content of communications and targeting voters—and CLC’s original complaint alleged that Cambridge Analytica used or conveyed to Make America Number 1 information about the Trump campaign’s “plans, projects, activities or needs,” and that such information was “material to the creation, production, or distribution” of the super PAC’s ads supporting Trump or attacking his opponent, Hillary Clinton. 11 C.F.R. § 109.21(d)(4). As a result of this arrangement and these activities, there is reason to believe that Make America Number 1 illegally made in-kind contributions to the Trump campaign in the form of coordinated communications.

Newly published Cambridge Analytica emails and other documents from the 2016 election cycle provide further evidence in support of these allegations.<sup>4</sup> Among other things, the documents underscore how key Trump campaign officials—such as Steve Bannon and Kellyanne

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<sup>1</sup> See Compl. ¶¶ 95-102.

<sup>2</sup> Donald J. Trump for President, Inc., Disbursements to Cambridge Analytica, 2015-16, FEC.gov, [https://www.fec.gov/data/disbursements/?data\\_type=processed&committee\\_id=C00580100&recipient\\_name=cambridge+analytica&two\\_year\\_transaction\\_period=2016](https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00580100&recipient_name=cambridge+analytica&two_year_transaction_period=2016) (last visited Oct. 13, 2020).

<sup>3</sup> Make America Number 1, Disbursements to Cambridge Analytica, June 22, 2016 - Dec. 31, 2016, FEC.gov, [https://www.fec.gov/data/disbursements/?data\\_type=processed&committee\\_id=C00575373&recipient\\_name=cambridge+analytica&two\\_year\\_transaction\\_period=2016&min\\_date=06%2F22%2F2016&max\\_date=12%2F31%2F2016](https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00575373&recipient_name=cambridge+analytica&two_year_transaction_period=2016&min_date=06%2F22%2F2016&max_date=12%2F31%2F2016) (last visited Oct. 13, 2020); Make America Number 1, Independent Expenditures to Cambridge Analytica (regularly scheduled reports), June 22, 2016 - Dec. 31, 2016, FEC.gov, [https://www.fec.gov/data/independent-expenditures/?data\\_type=processed&committee\\_id=C00575373&is\\_notice=false&most\\_recent=true&payee\\_name=cambridge+analytica&min\\_date=06%2F22%2F2016&max\\_date=12%2F31%2F2016](https://www.fec.gov/data/independent-expenditures/?data_type=processed&committee_id=C00575373&is_notice=false&most_recent=true&payee_name=cambridge+analytica&min_date=06%2F22%2F2016&max_date=12%2F31%2F2016) (last visited Oct. 13, 2020).

<sup>4</sup> Internet Archive, *Cambridge Analytica: Select 2016 Campaign-Related Documents*, <https://archive.org/details/ca-docs-with-redactions-sept-23-2020-4pm/mode/2up> (last visited Oct. 13, 2020).

Conway—were involved in Cambridge Analytica’s operations, evince a pattern of Cambridge Analytica facilitating common vendor coordination, and indicate striking parallels between the advertisements that Cambridge Analytica produced for the super PAC and those disseminated by the Trump campaign.

These materials further establish how Cambridge Analytica functioned as a conduit for unlawful coordination between Make America Number 1 and the 2016 Trump campaign. The newly available evidence is described below, together with other previously published reports to put the evidence in context.

#### FACTUAL BACKGROUND

1. Cambridge Analytica is a data firm that has contracted with at least 23 federal U.S. candidates and political committees since the 2014 elections for “data management,” “donor modeling,” “survey research,” and similar services.<sup>5</sup> As *The Guardian* described it:

[Cambridge Analytica] claims to be able to analyse huge amounts of consumer data and combine that with behavioural science to identify people who organisations can target with marketing material. It collects data from a wide range of sources, including social media platforms such as Facebook, and its own polling.<sup>6</sup>

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<sup>5</sup> See Disbursements to Cambridge Analytica, 2013-20, FEC.gov, [https://www.fec.gov/data/disbursements/?data\\_type=processed&recipient\\_name=cambridge+analytica&two\\_year\\_transaction\\_period=2014&two\\_year\\_transaction\\_period=2016&two\\_year\\_transaction\\_period=2018&two\\_year\\_transaction\\_period=2020&max\\_date=12%2F31%2F2020](https://www.fec.gov/data/disbursements/?data_type=processed&recipient_name=cambridge+analytica&two_year_transaction_period=2014&two_year_transaction_period=2016&two_year_transaction_period=2018&two_year_transaction_period=2020&max_date=12%2F31%2F2020) (last visited Oct. 13, 2020); Independent Expenditures to Cambridge Analytica (regularly scheduled reports), FEC.gov, [https://www.fec.gov/data/independent-expenditures/?data\\_type=processed&is\\_notice=false&most\\_recent=true&payee\\_name=cambridge+analytica](https://www.fec.gov/data/independent-expenditures/?data_type=processed&is_notice=false&most_recent=true&payee_name=cambridge+analytica) (last visited Oct. 13, 2020).

<sup>6</sup> Hilary Osborne, *What is Cambridge Analytica? The firm at the centre of Facebook’s data breach*, THE GUARDIAN (Mar. 18, 2018), <https://www.theguardian.com/news/2018/mar/18/what-is-cambridge-analytica-firm-at-centre-of-facebook-data-breach>.

2. Cambridge Analytica incorporated in Delaware on December 31, 2013,<sup>7</sup> and in the United Kingdom on July 14, 2014.<sup>8</sup> Cambridge Analytica's parent company was the U.K.-based SCL Group, a data firm that claimed it "provides data, analytics and strategy to governments and military organizations worldwide" and has "conducted behavioral change programs in over 60 countries."<sup>9</sup>
3. Cambridge Analytica was reportedly started with a \$15 million investment from Robert Mercer, and until its dissolution was "owned almost entirely by Mr. Mercer."<sup>10</sup> Its board included Robert Mercer's daughter, Rebekah Mercer, and Stephen K. Bannon.<sup>11</sup> According to Bannon's personal financial disclosure report (filed in 2017, after he became a White House employee), Bannon became Cambridge Analytica's Vice President and Secretary in June 2014, and received a monthly consulting fee from the company until he resigned from its board on August 16, 2016, when he became Trump campaign CEO.<sup>12</sup> Throughout the 2016 election cycle, Bannon held an ownership stake in Cambridge Analytica valued between \$1,000,001 and \$5,000,000.<sup>13</sup>

<sup>7</sup> *Cambridge Analytica LLC*, Delaware Division of Corporations, <https://icis.corp.delaware.gov/Ecorp/EntitySearch/NameSearch.aspx> (last visited Oct. 13, 2020); see also Andy Kroll, *Cloak and Data: The Real Story Behind Cambridge Analytica's Rise and Fall*, MOTHER JONES (May/June 2018), <https://www.motherjones.com/politics/2018/03/cloak-and-data-cambridge-analytica-robert-mercero/> (noting "The company was incorporated in Delaware on December 31, 2013.").

<sup>8</sup> U.K. Companies House Registration, Company Number 09154503, <https://beta.companieshouse.gov.uk/company/09154503>.

<sup>9</sup> See, e.g., Adam Taylor, *Cambridge Analytica's Reach Went Far Beyond the U.S. Elections*, WASH. POST (Mar. 21, 2018), <https://www.washingtonpost.com/news/worldviews/wp/2018/03/20/cambridge-analyticas-reach-went-far-beyond-the-u-s-elections/>.

<sup>10</sup> Matthew Rosenberg, Nicholas Confessore & Carole Cadwalladr, *How Trump Consultants Exploited the Facebook Data of Millions*, N.Y. TIMES (Mar. 17, 2018), <https://www.nytimes.com/2018/03/17/us/politics/cambridge-analytica-trump-campaign.html>.

<sup>11</sup> *Id.*; see also Steve Bannon, Personal Financial Disclosure Report, OGE Form 278e at 2-4 (Mar. 31, 2017), <https://assets.documentcloud.org/documents/3766553/Bannon-Steve.pdf> (disclosing that Bannon was Cambridge Analytica's vice president and secretary from June 2014 until August 2016).

<sup>12</sup> Steve Bannon, Personal Financial Disclosure Report, *supra* note 11, at 3-5.

<sup>13</sup> *Id.* at 4 (disclosing that as of March 31, 2017, months after the conclusion of the 2016 election, Bannon still owned Cambridge Analytica "membership units" valued between \$1,000,001 and \$5,000,000).

4. According to the *Washington Post*, “Rebekah Mercer has urged the organizations that her family funds to hire the company, according to people familiar with her advocacy”;<sup>14</sup> indeed, Commission records show that in multiple instances, super PACs funded by the Mercers contracted with Cambridge Analytica, as did the candidates supported by those super PACs.<sup>15</sup>

<sup>14</sup> Matea Gold, *The Rise of GOP Mega-Donor Rebekah Mercer*, WASH. POST (Sept. 14, 2016), [https://www.washingtonpost.com/politics/the-rise-of-gop-mega-donor-rebekah-mercer/2016/09/13/85ae3c32-79bf-11e6-beac-57a4a412e93a\\_story.html](https://www.washingtonpost.com/politics/the-rise-of-gop-mega-donor-rebekah-mercer/2016/09/13/85ae3c32-79bf-11e6-beac-57a4a412e93a_story.html).

<sup>15</sup> For example, in 2014, the Mercer-funded super PAC Ending Spending Action Fund made independent expenditures to Cambridge Analytica that supported candidate Art Robinson and attacked his opponent, and Robinson's campaign also paid Cambridge Analytica. Ending Spending Action Fund, Receipts from Robert Mercer, 2013-14, FEC.GOV, [https://www.fec.gov/data/receipts/?data\\_type=processed&committee\\_id=C00489856&contributor\\_name=mercer&two\\_year\\_transaction\\_period=2014&max\\_date=12%2F31%2F2020](https://www.fec.gov/data/receipts/?data_type=processed&committee_id=C00489856&contributor_name=mercer&two_year_transaction_period=2014&max_date=12%2F31%2F2020) (last visited Oct. 13, 2020); Ending Spending Action Fund, Independent Expenditures to Cambridge Analytica (regularly scheduled reports), FEC.GOV, [https://www.fec.gov/data/independent-expenditures/?data\\_type=processed&committee\\_id=C00489856&is\\_notice=true&most\\_recent=true&payee\\_name=cambridge+analytica](https://www.fec.gov/data/independent-expenditures/?data_type=processed&committee_id=C00489856&is_notice=true&most_recent=true&payee_name=cambridge+analytica) (last visited Oct. 13, 2020); Art Robinson for Congress, Disbursements to Cambridge Analytica, 2013-14, FEC.GOV, [https://www.fec.gov/data/disbursements/?spender\\_committee\\_type=P&spender\\_committee\\_type=S&spender\\_committee\\_type=H&data\\_type=processed&committee\\_id=C00481341&recipient\\_name=cambridge+analytica&two\\_year\\_transaction\\_period=2014](https://www.fec.gov/data/disbursements/?spender_committee_type=P&spender_committee_type=S&spender_committee_type=H&data_type=processed&committee_id=C00481341&recipient_name=cambridge+analytica&two_year_transaction_period=2014) (last visited Oct. 13, 2020). Mercer funded the John Bolton Super PAC, which contracted with Cambridge Analytica and made independent expenditures supporting Thom Tillis (and opposing his opponent, Kay Hagan), whose campaign also contracted with Cambridge Analytica. John Bolton Super PAC, Receipts from Robert Mercer, 2013-14, FEC.GOV, [https://www.fec.gov/data/receipts/?data\\_type=processed&committee\\_id=C00542464&contributor\\_name=mercer&two\\_year\\_transaction\\_period=2014&max\\_date=12%2F31%2F2020](https://www.fec.gov/data/receipts/?data_type=processed&committee_id=C00542464&contributor_name=mercer&two_year_transaction_period=2014&max_date=12%2F31%2F2020) (last visited Oct. 13, 2020); John Bolton Super PAC, Disbursements to Cambridge Analytica, 2013-14, FEC.GOV, [https://www.fec.gov/data/disbursements/?data\\_type=processed&committee\\_id=C00542464&recipient\\_name=cambridge+analytica&two\\_year\\_transaction\\_period=2014](https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00542464&recipient_name=cambridge+analytica&two_year_transaction_period=2014) (last visited Oct. 13, 2020); John Bolton Super PAC, Independent Expenditures supporting/opposing Thom Tillis and Kay Hagan, 2013-14, FEC.GOV, [https://www.fec.gov/data/independent-expenditures/?data\\_type=processed&committee\\_id=C00542464&is\\_notice=true&candidate\\_id=S4NC00162&candidate\\_id=S8NC00239&support\\_oppose\\_indicator=S&min\\_date=01%2F01%2F2013&max\\_date=12%2F31%2F2014](https://www.fec.gov/data/independent-expenditures/?data_type=processed&committee_id=C00542464&is_notice=true&candidate_id=S4NC00162&candidate_id=S8NC00239&support_oppose_indicator=S&min_date=01%2F01%2F2013&max_date=12%2F31%2F2014) (last visited Oct. 13, 2020); Thom Tillis Committee, Disbursements to Cambridge Analytica, 2013-14, FEC.GOV, [https://www.fec.gov/data/disbursements/?data\\_type=processed&committee\\_id=C00545772&recipient\\_name=cambridge+analytica&two\\_year\\_transaction\\_period=2014](https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00545772&recipient_name=cambridge+analytica&two_year_transaction_period=2014) (last visited Oct. 13, 2020).

5. During the 2016 Republican presidential primaries, Robert Mercer financed a super PAC called Keep the Promise I,<sup>16</sup> which supported then-candidate Ted Cruz.<sup>17</sup> Both Keep the Promise I and the Cruz campaign contracted with Cambridge Analytica.<sup>18</sup>
6. In an April 2016 Facebook Live interview with *The Hill*, a Cambridge Analytica employee working on the Keep the Promise I account repeatedly described the Cruz campaign's strategies, plans, and activities.<sup>19</sup> A subsequent article published on *The Hill* website used quotes from the interview.<sup>20</sup> Newly released internal documents show that Cambridge Analytica drafted a press release claiming that *The Hill* article used quotes "taken out of context," and that the employee "remains outside of the campaign's physical and technical firewall";<sup>21</sup> the release does not specify what quotes were taken out of context, and the underlying interview shows the employee repeatedly responding in detail to questions about the Cruz campaign's strategies, plans, and activities.<sup>22</sup> It does not appear that the press

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<sup>16</sup> Keep the Promise I/Make America Number 1, Receipts from Robert Mercer, Jan. 1, 2015 - June 22, 2016, FEC.GOV, [https://www.fec.gov/data/receipts/?data\\_type=processed&committee\\_id=C00575373&contributor\\_name=robert+merc&two\\_year\\_transaction\\_period=2016&min\\_date=01%2F01%2F2015&max\\_date=06%2F22%2F2016](https://www.fec.gov/data/receipts/?data_type=processed&committee_id=C00575373&contributor_name=robert+merc&two_year_transaction_period=2016&min_date=01%2F01%2F2015&max_date=06%2F22%2F2016) (last visited Oct. 13, 2020).

<sup>17</sup> Ryan Lizza, *Kellyanne Conway's Political Machinations*, NEW YORKER (Oct. 8, 2016), <https://www.newyorker.com/magazine/2016/10/17/kellyanne-conways-political-machinations>. Conway told the *New Yorker* that she was a close personal friend of Rebekah Mercer. *Id.*

<sup>18</sup> Keep the Promise I/Make America Number 1, Disbursements to Cambridge Analytica, Jan. 1, 2015-June 22, 2016, FEC.GOV [https://www.fec.gov/data/disbursements/?data\\_type=processed&committee\\_id=C00575373&recipient\\_name=cambidge+analytica&two\\_year\\_transaction\\_period=2016&min\\_date=01%2F01%2F2015&max\\_date=06%2F22%2F2016](https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00575373&recipient_name=cambidge+analytica&two_year_transaction_period=2016&min_date=01%2F01%2F2015&max_date=06%2F22%2F2016) (last visited Oct. 13, 2020); Cruz for President, Disbursements to Cambridge Analytica, 2015-16, FEC.GOV, [https://www.fec.gov/data/disbursements/?data\\_type=processed&committee\\_id=C00574624&recipient\\_name=cambidge+analytica&two\\_year\\_transaction\\_period=2016](https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00574624&recipient_name=cambidge+analytica&two_year_transaction_period=2016) (last visited Oct. 13, 2020).

<sup>19</sup> The Hill, *We're Talking With Brittany Kaiser of Ted Cruz's Data Mining Firm Cambridge Analytica*, FACEBOOK LIVE (Apr. 26, 2016), [https://www.facebook.com/watch/live/?v=10153727734744087&ref=watch\\_permalink](https://www.facebook.com/watch/live/?v=10153727734744087&ref=watch_permalink)

<sup>20</sup> Jonathan Swan, *Cruz Firm Readies for Psychological Ops at GOP Convention*, THE HILL (Apr. 26, 2016), <https://thehill.com/blogs/ballot-box/presidential-races/277758-cruz-firm-readies-for-psychological-ops-at-gop-convention>.

<sup>21</sup> Press Release, Cambridge Analytica, Cambridge Analytica Responds to Article in The Hill (Apr. 27, 2016) (attached as Exhibit A).

<sup>22</sup> The Hill, *We're Talking With Brittany Kaiser of Ted Cruz's Data Mining Firm Cambridge Analytica*, *supra* note 19.

release was issued publicly. The employee additionally sent an email to Cruz campaign officials apologizing “for the very unfortunate deviation in questioning.”<sup>23</sup>

7. Kellyanne Conway served as president of Keep the Promise I.<sup>24</sup> Emails indicate that the Long Island-based Mercers installed Conway as the super PAC’s president and directed the super PAC to contract with Cambridge Analytica. For example, in August 2015, when Conway sought to negotiate terms of the super PAC’s contract with Cambridge Analytica, Cambridge Analytica CEO Alexander Nix wrote in emails that “It was made crystal clear to Kellyanne from the beginning that [Keep the Promise] were to be engaging [Cambridge Analytica],”<sup>25</sup> and that “Kellyanne is being deliberately obtuse about this contract because she is upset with Long Island’s decision to allow CA to service multiple Presidential campaigns. She needs to be (firmly) reminded that the people that made this decision are the same people who empowered her as Head of the KTP PAC!”<sup>26</sup>
8. During the period that Cambridge Analytica was providing services to the pro-Cruz Keep the Promise I and the Cruz campaign itself, the company—with the involvement of Cambridge Analytica vice president Steve Bannon—was additionally seeking other clients. In a September 2015 email chain, for example, Bannon weighed in with a demand for an accelerated timeline as Cambridge Analytica sought to negotiate a contract with the Trump campaign.<sup>27</sup> Bannon additionally played a central role in Cambridge Analytica’s negotiations

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<sup>23</sup> Email from Brittany Kaiser to Jeff Roe, et al. at 1 (Apr. 27, 2016) (attached as Exhibit B).

<sup>24</sup> *Id.*

<sup>25</sup> Emails between Alexander Nix and Larry Levy at 3 (Aug. 12, 2015) (attached as Exhibit C). Nix used abbreviations for “Keep the Promise” and “Cambridge Analytica.” *Id.*

<sup>26</sup> *Id.* at 1. “Long Island” is an apparent reference to the Long Island-based Mercers.

<sup>27</sup> Email from Stephen K. Bannon to Alexander Nix and Brittany Kaiser at 1 (Sept. 12, 2015) (attached as Exhibit D).

with other potential clients, such as Arron Banks, the co-founder of a campaign for Britain to leave the European Union.<sup>28</sup>

9. In May of 2016, after Cruz dropped out of the presidential race, Rebekah Mercer and Kellyanne Conway met with Trump's daughter Ivanka and son-in-law Jared Kushner at Trump Tower, and decided to back Trump for president, according to the *Washington Post*.<sup>29</sup>
10. On June 22, 2016, Keep the Promise I filed an amended Statement of Organization with the Commission changing its name to "Make America Number 1,"<sup>30</sup> with super PAC officials stating publicly that the PAC would support Trump (and oppose his opponent, Hillary Clinton).<sup>31</sup> Conway announced that she would be stepping down as super PAC president, and had recruited David Bossie to serve as her successor.<sup>32</sup>
11. On July 1, 2016, the Trump campaign announced in a press release that it had hired Kellyanne Conway as Senior Political Advisor.<sup>33</sup>
12. In August of 2016, Robert and Rebekah Mercer met privately with Trump and "recommended he elevate Breitbart News chairman Stephen Bannon and Republican pollster Kellyanne Conway," according to the *Wall Street Journal*.<sup>34</sup> "He did so days later," the

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<sup>28</sup> Emails between Stephen K. Bannon, Alexander Nix and Arron Banks at 2-3 (Oct. 21, 2015) (attached as Exhibit E).

<sup>29</sup> Gold, *supra* note 14.

<sup>30</sup> Rebuilding America Now, Statement of Organization, FEC Form 1 at 1 (amended June 22, 2016), <http://docquery.fec.gov/pdf/183/201606229020090183/201606229020090183.pdf>.

<sup>31</sup> Joshua Green & Zachary Mider, *New Super-PAC Launches for Donors Who Won't Back Trump But Loathe Clinton*, BLOOMBERG (June 21, 2016), <http://www.bloomberg.com/politics/articles/2016-06-22/new-super-pac-launches-for-donors-who-won-t-back-trump-but-loathe-clinton>.

<sup>32</sup> *Id.*

<sup>33</sup> Press Release, Donald J. Trump for President, Inc., Donald J. Trump Announces Key Appointments (July 1, 2016), <https://www.donaldjtrump.com/press-releases/donald-j.-trump-announces-key-appointments>; *see also* Sean Sullivan, *Trump Hires Ex-Cruz Super PAC Strategist Kellyanne Conway*, WASH. POST (July 1, 2016), <https://www.washingtonpost.com/news/post-politics/wp/2016/07/01/trump-hires-ex-cruz-super-pac-strategist-kellyanne-conway/>.

<sup>34</sup> Rebecca Ballhaus, *Rebekah Mercer Takes Helm of Pro-Trump PAC, Extending Family's Influence in Campaign*, WALL ST. J. (Sept. 7, 2016), <http://blogs.wsj.com/washwire/2016/09/07/rebekah-mercera-takes-helm-of-pro-trump-pac-extending-familys-influence-in-campaign/>.



*Journal* reported, promoting Conway to campaign manager, and hiring Bannon as campaign CEO.<sup>35</sup>

13. According to Bannon’s personal financial disclosure report, Bannon resigned from Cambridge Analytica’s board on August 16, 2016, one day before he became Trump campaign CEO.<sup>36</sup> However, throughout the 2016 election cycle, Bannon held an ownership stake in Cambridge Analytica valued between \$1,000,001 and \$5,000,000,<sup>37</sup> and emails indicate that Cambridge Analytica staffers were still referring to “our very own Steve Bannon” as late as January 2017.<sup>38</sup>
14. On September 7, 2016, the *Wall Street Journal* reported that Bossie—whom Conway had selected to replace her at the super PAC when she joined the Trump campaign—would be joining the Trump campaign, and that Rebekah Mercer would lead the super PAC:

Rebekah Mercer, daughter of hedge-fund manager and Republican mega-donor Robert Mercer, is taking the reins of one of the top super PACs backing Donald Trump, further solidifying her family’s influence in the Trump campaign.

The group, called Make America Number 1, was previously run by David Bossie, who also heads a conservative group called Citizens United. Mr. Bossie last week quit the super PAC to join the Trump campaign as deputy campaign manager.<sup>39</sup>

15. As former super PAC officials took the helm of the Trump campaign, the Trump campaign then hired Cambridge Analytica, and reportedly did so at the behest of Rebekah Mercer, the super PAC’s chair.<sup>40</sup> Commission records show that the Trump campaign’s first payment to

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<sup>35</sup> *Id.*; see also Monica Langley, *Donald Trump Overhauls Campaign, Adds GOP Pollster Kellyanne Conway and Breitbart’s Stephen Bannon*, WALL ST. J. (Aug. 17, 2016), <http://www.wsj.com/articles/donald-trump-overhauls-campaign-team-1471424401>.

<sup>36</sup> Steve Bannon, Personal Financial Disclosure Report, *supra* note 11, at 2-4.

<sup>37</sup> *Id.* at 4.

<sup>38</sup> Email from Brittany Kaiser to M. Hunter, et al. at 1 (Jan. 10, 2017) (attached as Exhibit F).

<sup>39</sup> Ballhaus, *supra* note 34.

<sup>40</sup> Kenneth P. Vogel, *The Heiress Quietly Shaping the Trump Administration*, POLITICO (Nov. 21, 2016), <http://www.politico.com/story/2016/11/rebekah-mercero-donald-trump-231693> (“Three GOP digital strategists say Mercer used her influence in Trump’s circle to ensure that Cambridge Analytica, which also counted Bannon as a board member, would be brought on board by Trump’s campaign team . . .”).

Cambridge Analytica came just weeks after the Mercers and Make America Number 1 shifted their allegiance to Trump, and after Conway joined the campaign; the campaign would go on to pay Cambridge Analytica \$5.9 million in the 2016 cycle.<sup>41</sup>

16. Even after Cambridge Analytica’s former board member and part-owner Steve Bannon became Trump campaign CEO, Make America Number 1 continued contracting with Cambridge Analytica to produce, target, and disseminate communications supporting Trump’s election; the super PAC paid over \$4.4 million to Cambridge Analytica after Bannon joined the Trump campaign.<sup>42</sup>
17. Cambridge Analytica employees were acutely aware that top Cambridge Analytica officers and former super PAC officials were playing major roles in the Trump campaign. For example, on September 2, 2016, a Cambridge Analytica staffer sent an email to two of his colleagues with the subject line “In the thick of it!” and excerpting a *Washington Post* article: “That leaves three Mercer allies—Bannon, Conway and Bossie—atop the Trump campaign. Hedge fund investor Robert L. Mercer and his daughter, Rebekah, were key players in urging Trump to reshuffle his campaign this summer.”<sup>43</sup> “The NYC staff are in the thick of it,” he wrote.<sup>44</sup> The email also noted that “Bob Mercer came by the office yesterday.”<sup>45</sup>

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<sup>41</sup> Donald J. Trump for President, Inc., Disbursements to Cambridge Analytica, 2015-16, FEC.GOV, [https://www.fec.gov/data/disbursements/?data\\_type=processed&committee\\_id=C00580100&recipient\\_name=cambridge+analytica&two\\_year\\_transaction\\_period=2016](https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00580100&recipient_name=cambridge+analytica&two_year_transaction_period=2016) (last visited Oct. 13, 2020) (showing the first disbursement to Cambridge Analytica on July 29, 2016 and \$5.9 million in total disbursements in the 2016 cycle).

<sup>42</sup> Make America Number 1, Disbursements to Cambridge Analytica, Aug. 17, 2016 - Dec. 31, 2016, FEC.GOV, [https://www.fec.gov/data/disbursements/?data\\_type=processed&committee\\_id=C00575373&recipient\\_name=cambridge+analytica&two\\_year\\_transaction\\_period=2016&min\\_date=08%2F17%2F2016&max\\_date=12%2F31%2F2016](https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00575373&recipient_name=cambridge+analytica&two_year_transaction_period=2016&min_date=08%2F17%2F2016&max_date=12%2F31%2F2016) (last visited Oct. 13, 2020); Make America Number 1, Independent Expenditures to Cambridge Analytica (regularly scheduled reports), Aug. 17, 2016 - Dec. 31, 2016, FEC.GOV, [https://www.fec.gov/data/independent-expenditures/?data\\_type=processed&committee\\_id=C00575373&is\\_notice=false&most\\_recent=true&payee\\_name=cambridge+analytica&min\\_date=08%2F17%2F2016&max\\_date=12%2F31%2F2016](https://www.fec.gov/data/independent-expenditures/?data_type=processed&committee_id=C00575373&is_notice=false&most_recent=true&payee_name=cambridge+analytica&min_date=08%2F17%2F2016&max_date=12%2F31%2F2016) (last visited Oct. 13, 2020).

<sup>43</sup> Email from Robert Murtfield to Ed DeNicola et al. (Sept. 2, 2016) (attached as Exhibit G).

<sup>44</sup> *Id.*

<sup>45</sup> *Id.*

18. The nature of Cambridge Analytica’s work for the super PAC and for the campaign is described in various internal documents. A 27-page post-election report from February 2017 shows that Cambridge Analytica created, produced, and distributed ads for the Trump campaign during the final months of the election.<sup>46</sup> According to the report, Cambridge Analytica ran “5,000+ ad campaigns”<sup>47</sup> on behalf of the Trump campaign that generated “1.5 billion impressions.”<sup>48</sup> The “persuasion” ads corresponded with a 3% average favorability increase, and get-out-the-vote ads “drove a 2% increase in voters submitting absentee ballots,”<sup>49</sup> according to the report. Cambridge Analytica claimed that it developed audience profiles, “devised communications to best promote a story to those individuals,” and then “executed digital ad buys” on the Trump campaign’s behalf.<sup>50</sup> The report included samples of Trump campaign ads that Cambridge Analytica produced and placed on platforms such as Facebook, Twitter, Snapchat, and Google;<sup>51</sup> some of those ads included the “Crooked Hillary” messaging also deployed by Make America Number 1.
19. During the same period that Cambridge Analytica was creating and targeting the Trump campaign’s own ads, it was also creating and targeting Make America Number 1 ads supporting Trump or attacking his opponent. In a November 2016 post-election report produced for Make America Number 1, Cambridge Analytica stated that it:

delivered data modeling, television targeting and placement, digital ad targeting and delivery, list building, and polling to Make America Number One’s (MAN1) project “Defeat Crooked Hillary” (DCH) during 2016’s Presidential election. During that time, CA delivered millions of ad impressions nationwide, with a

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<sup>46</sup> Data and Digital Marketing Debrief: Trump for President, Cambridge Analytica at 1-26 (February 2017) (attached as Exhibit H).

<sup>47</sup> *Id.* at 9.

<sup>48</sup> *Id.* at 11.

<sup>49</sup> *Id.* at 10.

<sup>50</sup> *Id.* at 11.

<sup>51</sup> *Id.* at 15, 17-19.

special focus on New Hampshire, Pennsylvania, Virginia, North Carolina, Florida, Ohio, Iowa, Colorado, Nevada, and Michigan.<sup>52</sup>

20. In that post-election report, Cambridge Analytica took credit for producing “all of the creative” for the super PAC’s pro-Trump/anti-Clinton ads, for managing the PAC’s email and social media campaigns, and for producing the PAC’s websites:

Over the course of the election cycle, from July to November, Cambridge Analytica produced all of the creative behind Defeat Crooked Hillary’s ad campaigns. In that five month span, 14 different ad campaigns were run, each including a minimum of 12 creative pieces, totaling over 170 individual ads. These ads were distributed by the CA digital team and were interacted with by tens of millions of users online.

Along with standard digital ads, CA also designed and sent out personalized email campaigns, advertised on Snapchat, Twitter and Facebook, and designed infographics to clearly display our data models to the press, and donors.

CA was also responsible for running the shareable creative pieces behind the Super PAC’s multiple social media accounts in order to organically attract new activists, users and donations. In this effort, CA designed 48 unique graphic images for each social media account which received tens of thousands of online interactions.

In addition to advertising and social media, CA was responsible for the design and management of all three websites linked to the Super PAC; Defeat Crooked Hillary, 2016 Truths and Save the Supreme Court.<sup>53</sup>

21. Cambridge Analytica also took credit for placing “[f]our major television buys” for the super PAC,<sup>54</sup> and noted that in the final days of the 2016 election, Cambridge Analytica targeted the state of Michigan with “72 hour voter turnout” videos that generated 6 million impressions.<sup>55</sup> According to Cambridge Analytica, “If MAN1 had not made the final GOTV

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<sup>52</sup> Cambridge Analytica, Make America Number One After Action Report at 1 (Nov. 2016) (attached as Exhibit I).

<sup>53</sup> *Id.* at 10.

<sup>54</sup> *Id.* at 14.

<sup>55</sup> *Id.* at 9.

investment in the state, we can reasonably argue Trump would not have achieved his historic victory in Michigan.”<sup>56</sup>

22. According to the report, Make America Number 1 paid Cambridge Analytica \$5,593,648 during the 2016 cycle, and “[o]f this, \$3,868,714 - roughly 70 percent - went to delivering messaging directly to voters with the remainder going to overhead. Overhead included the retainer, the Evangelicals data acquisition, and the polling conducted by CA.”<sup>57</sup>
23. In a separate report, Cambridge Analytica asserted that the \$2.5 million that Make America Number 1 spent on digital ads resulted in 211 million total impressions, with 50 million impressions on Facebook and the digital videos receiving 25 million views.<sup>58</sup>
24. Emails from September 2016 show that Cambridge Analytica produced some of the super PAC’s anti-Clinton ads using the production company Glittering Steel, which was owned by the Trump campaign’s then-CEO, Steve Bannon.<sup>59</sup> For example, in a September 9, 2016 email, a Cambridge Analytica official sent links to five Make America Number 1 ads “managed” by Cambridge Analytica and “produced by Glittering Steel, our production partner.”<sup>60</sup>
25. Internal Cambridge Analytica documents additionally show a shared “project calendar” that jointly listed both the Trump and MAN1 accounts.<sup>61</sup>

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<sup>56</sup> *Id.*

<sup>57</sup> *Id.* at 15.

<sup>58</sup> CA Political, *Partido Revolucionario Institucional (PRI): The Path to Campaign Victory* at 37 (December 2017) (attached as Exhibit J).

<sup>59</sup> Bannon claims to have resigned as Chair of Glittering Steel in August of 2016, but he continued to retain a financial stake in the firm throughout the 2016 election cycle. Steve Bannon, Personal Financial Disclosure Report, *supra* note 11, at 4, 7 (disclosing that as of March 31, 2017, months after the conclusion of the 2016 election, Bannon still owned Glittering Steel “membership units” valued between \$100,001 and \$250,000).

<sup>60</sup> Email from Emily Cornell to Al Han, et al. at 4 (Sept. 9, 2016) (attached as Exhibit K).

<sup>61</sup> Cambridge Analytica, “Project Calendar” at 1 (Sept. 12, 2016) (attached as Exhibit L).

26. Emails indicate that Cambridge Analytica employees in some cases confused the work performed for the Trump campaign and for the super PAC. In February 2017, for example, in response to an outside request for “case studies,” Cambridge Analytica’s Ed Nicola emailed two Cambridge Analytica colleagues and the external requester “a finished case study for the Make America Number One Super PAC,” but then the next day sent a follow-up email with the correction: “This is actually the Donald J. Trump for President case study and not the one for the Super PAC. We did data analytics and ad targeting for the Make America Number One Super PAC in addition to the work we did for the DJTfP campaign. I need to update the label.”<sup>62</sup>
27. In March 2017, SCL Group’s Robert Murtfeld reacted to a *New York Times* article, in part, by describing “our work” for both the Trump campaign and the super PAC in the same sentence: “And yes whilst the Trump campaign only used tone analysis and persuasion scores for analytics, our work for the Super PAC used psychographics throughout (but we don’t want to run around with this as the Super PAC was called Defeat Crooked Hillary).”<sup>63</sup>

#### SUMMARY OF THE LAW

28. As noted in CLC’s original complaint, because Make America Number 1 paid for millions in independent expenditures supporting Trump or opposing Clinton, the communications satisfied the “payment” and “content” prongs of the coordinated communication standard, 11 CFR § 109.21(a);<sup>64</sup> the communications additionally met the “conduct” standard by the super PAC using Cambridge Analytica—which was also contracting with the Trump campaign—to

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<sup>62</sup> Emails from Ed DeNicola to Matthew Atkinson, et al. at 1 (Feb. 21-22, 2017) (attached as Exhibit M).

<sup>63</sup> Email from Robert Murtfeld to Blake Gottesman at 1 (Mar. 6, 2017) (attached as Exhibit N).

<sup>64</sup> Compl. ¶¶ 92-100.

create, produce, and /or distribute the communications. The “conduct” prong of the coordinated communication standard is satisfied when a vendor uses or conveys to a super PAC information about a candidate’s “plans, projects, activities or needs” and “that information is material to the creation, production, or distribution of the communication.” 11 C.F.R. § 109.21(d)(4).<sup>65</sup>

**MAKE AMERICA NUMBER 1 ILLEGALLY MADE UNREPORTED IN-KIND CONTRIBUTIONS TO DONALD J. TRUMP FOR PRESIDENT**

29. As a vendor providing services to both the super PAC and the campaigns of candidates supported by that super PAC—first Ted Cruz, and then Donald Trump—Cambridge Analytica was in a position to share or apply strategic information from its work for candidates to develop and target communications for the super PAC that were consistent with or complementary to those of the candidates. The new evidence further provides reason to believe that Cambridge Analytica did in fact use or convey to Make America Number 1 information about the Trump campaign’s plans, projects, activities, or needs, and that such information was material to the targeted communications that the super PAC created to help elect Trump.
30. The Trump campaign reportedly began contracting with Cambridge Analytica at the request of the Mercers, who founded, owned, and managed the company;<sup>66</sup> the Mercers also directed

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<sup>65</sup> The conduct standard is not met if the vendor has established, implemented, and followed a written firewall policy that prohibits the flow of information about the campaign’s plans, projects, activities or needs to those responsible for the creation, production, or distribution of the super PAC’s communications. 11 C.F.R. § 109.21(h). A firewall may entail different vendor employees working for the candidate than are working for the super PAC, and an agreement that they not share or discuss strategy or plans with one another. However, the Commission has emphasized that “the mere existence of a confidentiality agreement or ethical screen” will not “provide a *de facto* bar to the enforcement of the limits on coordinated communication imposed by Congress.” 68 Fed. Reg. 421, 435 (Jan. 3, 2003). A common vendor may facilitate unlawful coordinated communications if a firewall policy is not followed or enforced.

<sup>66</sup> See sources cited *supra* ¶ 3.

Make America Number 1—which was financed by Robert Mercer and controlled by Rebekah Mercer—to contract with Cambridge Analytica.<sup>67</sup> The Trump campaign then hired Cambridge Analytica board member and part-owner Steve Bannon as campaign CEO at the request of the Mercers,<sup>68</sup> and throughout the entire 2016 election cycle, Bannon retained an ownership stake in Cambridge Analytica valued between \$1,000,001 and \$5,000,000.<sup>69</sup> Before joining the Trump campaign, Bannon had been involved in Cambridge Analytica’s day-to-day operations and client negotiations, and Cambridge Analytica staff continued to refer to Bannon as “our very own” through 2017.<sup>70</sup> Moreover, even after Bannon joined the Trump campaign, Cambridge Analytica and Make America Number 1 worked with Bannon’s production company, Glittering Steel, to produce at least five ads attacking Trump’s opponent.<sup>71</sup> In other words, the super PAC contracted with one company owned by Trump’s campaign CEO, which apparently subcontracted with another company owned by Trump’s campaign CEO, to produce and target ads supporting the Trump campaign. Finally, Kellyanne Conway and David Bossie were both senior officials at Make America Number 1 and in that role managed the super PAC’s relationship with Cambridge Analytica, and who were then subsequently hired for senior roles on the Trump campaign at the request of the Mercers, where they would have been in positions to manage the campaign’s contract with Cambridge Analytica.<sup>72</sup>

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<sup>67</sup> See sources cited *supra* ¶¶ 4-5, 7, 14-15.

<sup>68</sup> See sources cited *supra* ¶ 12.

<sup>69</sup> See sources cited *supra* ¶ 13.

<sup>70</sup> See sources cited *supra* ¶ 13.

<sup>71</sup> See sources cited *supra* ¶ 24.

<sup>72</sup> See sources cited *supra* ¶¶ 10-12, 14-15, 17. Additionally, a post-election email from a Cambridge Analytica employee notes that Kellyanne Conway was close friends with Rebekah Mercer and Steve Bannon, and that “we work with her extensively.” Email from Brittany Kaiser to Phillip Escaravadge at 1 (Jan. 12, 2017) (attached as Exhibit O).



31. Evidence from earlier in the 2016 cycle, during the period that the super PAC was supporting the Cruz campaign, additionally suggests that Cambridge Analytica employees ignored any written firewall policy, with staff assigned to the super PAC publicly expressing knowledge about the candidate’s plans, projects, and activities.<sup>73</sup> Evidence also indicates that Cambridge Analytica employees worked from a joint “project calendar” that listed both the Trump campaign and Make America Number 1 accounts, which may further indicate that staff for both accounts were meeting jointly to discuss strategy.<sup>74</sup> And later evidence from early 2017 shows the same employees describing the firm’s 2016 work for both the Trump campaign and the super PAC; in one communication, an employee appeared to confuse the two clients.<sup>75</sup>
32. This inference that Cambridge Analytica used or conveyed to Make America Number 1 non-public information about the Trump campaign’s “plans, projects, activities or needs,” and that such information was “material to the creation, production, or distribution” of the super PAC’s communications, is strengthened by the fact that the Make America Number 1 ads created by Cambridge Analytica are strikingly consistent with the message, themes, and content of ads run by the Trump campaign itself. For example, in the final months of the 2016 election, the Trump campaign ran ads with a “crooked Hillary” theme,<sup>76</sup> some of which directed viewers to “lyingcrookedhillary.com.”<sup>77</sup> The “lyingcrookedhillary.com” website bore a striking resemblance to the messaging and imagery of the “Defeat Crooked Hillary” communications that Cambridge Analytica produced for Make America Number 1:<sup>78</sup>

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<sup>73</sup> See sources cited *supra* ¶ 6.

<sup>74</sup> See sources cited *supra* ¶ 25.

<sup>75</sup> See sources cited *supra* ¶¶ 26-27.

<sup>76</sup> See sources cited *supra* ¶ 18.

<sup>77</sup> Donald J. Trump for President, LyingCrookedHillary.com (available via Archive.org) <https://web.archive.org/web/20160702081239/https://www.lyingcrookedhillary.com/> (last visited Oct. 13, 2020).

<sup>78</sup> Compare *id.*, with Exhibit I at 11.

**CROOKED HILLARY**

Help Stop  
**LYING CROOKED HILLARY**

**She's at it again**  
Spinning lies and weaving a tapestry of deceit that she hopes will cover the truth. Her despicable scandals and deceptions place our country and Americans like you – in jeopardy.

Your email

Your name  Zip code

Yes, please subscribe me to the Donald J. Trump for President email list.

[Join to Stop Her Now](#)

[Donate Now](#)

**Crooked Hillary 10 Legendary Lies**

- Hillary Lies to Benghazi Families
- Clinton Lies About Classified Material on Her Secret Server
- Secret Server - Hillary Broke the Rules & Lied About It

Sign up now to be notified of the next legendary lie!

**Secret Server - Hillary Broke the Rules & Lied About It**  
Tweet #CrookedHillary

When it comes to her unprecedented use of a rogue email system, Clinton has repeatedly claimed “everything I did was permitted.” **WRONG.**

A report by the State Department’s own watchdog destroys Clinton’s lie that she followed the rules. She did not get permission from anyone to exclusively use private email for all of her government work; she failed the requirement to use an authorized and secure system for her email communications; she broke federal records laws by shielding her official records from congressional and public scrutiny; and, she ignored warning after warning that her setup posed a significant cybersecurity risk.

There is no question that what she did was not allowed. The only question that remains is up to the FBI: was it criminal?

**MAKE AMERICA GREAT AGAIN!**

Paid for by Donald J. Trump for President, Inc.

**HILLARY CAN'T KEEP US SAFE**  
DEFEAT CROOKED HILLARY

**HILLARY CLINTON IS STILL LYING**  
DEFEAT CROOKED HILLARY

**LET'S STOP HILLARY**  
DONATE

**MORE LEAKED EMAILS, MORE SECRETS REVEALED**

**SHE'S NOT WITH YOU**

**CORRUPT & DANGEROUS**  
DEFEAT HILLARY

**LIES + CORRUPTION = HILLARY CLINTON**  
DEFEAT HILLARY

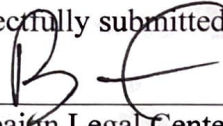
**STOP HILLARY BEFORE IT'S TOO LATE**

## CONCLUSION

Taken together, the evidence provides substantial reason to believe that Cambridge Analytica shared non-public information about the Trump campaign’s “plans, projects, activities or needs” with Make America Number 1, and that such information was material to the creation of the super PAC’s ads supporting Trump’s 2016 election. As a result of this arrangement and these activities, there is reason to believe that Make America Number 1 illegally made unreported in-kind contributions to Donald J. Trump for President, Inc. in the form of coordinated communications.

Please do not hesitate to contact us if we can provide any additional information.

Respectfully submitted,



---

Campaign Legal Center, by  
Brendan Fischer  
1101 14th Street, NW, Suite 400  
Washington, DC 20005  
(202) 736-2200

Brendan M. Fischer  
Campaign Legal Center  
1101 14th Street, NW, Suite 400  
Washington, DC 20005

Counsel to the Campaign Legal Center

**VERIFICATION**

The complainants listed below hereby verify that the statements made in the attached Complaint are, upon their information and belief, true.

Sworn pursuant to 18 U.S.C. § 1001.

**For Complainant Campaign Legal Center**

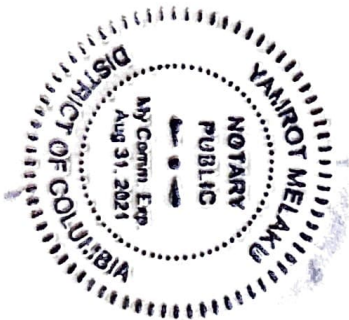
  
\_\_\_\_\_

Brendan Fischer

Sworn to and subscribed before me this 14 day of October 2020.

  
\_\_\_\_\_

Notary Public



# EXHIBIT A



**NEWS RELEASE:**  
Cambridge Analytica  
Robert Vanisko; North 6<sup>th</sup> Agency  
[REDACTED]

## **Cambridge Analytica Responds to Article in *The Hill***

**WASHINGTON D.C.- April 27, 2016** - Following an interview on Facebook Live yesterday with The Hill, quotes from Brittany Kaiser, director of program development at Cambridge Analytica, were taken out of context in a follow up article. Ms. Kaiser does not work on the presidential campaign of Senator Ted Cruz, and remains outside of the campaign's physical and technical firewall. As she made clear in the interview, her comments around potential strategy were purely speculative.

The author of the piece in question also failed to make distinctions between Cambridge Analytica and SCL Defence, two entirely different companies. There is no correlation between work done by SCL Defence and Cambridge Analytica, including any U.S. political campaigns.

In regard to the reporter's assertions that Cambridge Analytica uses fear as a motivator, Ms. Kaiser's response was also taken out of context in the follow up article. She responded that fear is only one of many emotions that contribute to a voter's psyche, and that many campaigns' main goal is to reassure voters by spelling out a candidate's policies in a way that will resonate with that individual.

Lastly, contrary to what was speculated in the article, Cambridge Analytica's work for Cruz for President does not include psychological profiling of delegates.

### **About Cambridge Analytica**

Cambridge Analytica, the U.S. subsidiary of SCL Group, is the market leader in the provision of data analytics and behavioral communications for political campaigns, issue groups and commercial enterprises. With cutting-edge technology, pioneering data science, and 25 years of experience in behavior change, CA provides advertisers with unparalleled insight into their audiences. More information can be found at: <https://cambridgeanalytica.org>.

###

# EXHIBIT B

Subject: Fwd: Hill article - follow up

From: Brittany Kaiser [REDACTED]

Date: Thu, 28 Apr 2016 10:31:44 +0000

To: "Levy, Larry" [REDACTED]

Hi Larry,

I received a message that this email I sent yesterday bounced and didn't get to your mailbox. Alexander asked me to copy you, so please confirm receipt.

Thanks for your assistance with this.

----- Forwarded message -----

From: Brittany Kaiser [REDACTED]

Date: 27 April 2016

Subject: Hill article - follow up

To: jroe [REDACTED], csweet [REDACTED]

Cc: Alexander Nix [REDACTED], "Levy, Larry" [REDACTED]

Dear Senator Cruz, Jeff, Chad, and Chris,

It is with great remorse that I write to you in regard to an article recently published in The Hill regarding Cambridge Analytica's technology and its uses in the 2016 cycle.

I took this interview after a firm briefing to the journalist that I do not work on the Presidential campaign, and did not have any knowledge of the strategies or tactics currently being employed in the Senator's campaign, so therefore could only speak generally about our company's methodologies.

I take full responsibility for the very unfortunate deviation in questioning which happened in a live interview. I had to reiterate that I did not work on the campaign and continually bring the conversation back to company history and current uses of our technology.Â

In the follow-up article, my comments were poorly misconstrued and I sincerely regret any negative implications this may produce for the campaign and our firm. Consequently, the article has been rewritten to make my firewalling obvious to readers, alongside clarification of some comments.Â

I also would like to acknowledge that senior executives at Cambridge Analytica have thoroughly taken me through the implications of this situation, which I am fully aware of now, and I more than regret having participated in any events leading to stress on the great work you are all are doing. In line with appropriate measures, I have withdrawn from all future press engagements in this cycle.

If there is anything additional I can do to reassure your team of my intentions, please advise and I will do everything in my power to respond accordingly.



With sincere regards,

Brittany

--

Brittany Kaiser, PhD Candidate, MPhil, LLM, MA Hons  
Director of Program Development

[Redacted]

CAÂ Cambridge Analytica  
[www.cambridgeanalytica.org](http://www.cambridgeanalytica.org)

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This email is confidential and may be privileged. If you are not the intended recipient or have received this email in error, please notify the sender immediately and delete this email. Any unauthorized copying, disclosure or distribution of the material in this email is strictly forbidden. Please note that any views or opinions presented in this email are solely those of the author and do not necessarily represent those of the company. Finally, the recipient should check this email and any attachments for the presence of viruses. The company accepts no liability for any damage caused by any virus transmitted by this email.

Please consider the environment before printing this e-mail

--

Brittany Kaiser, PhD Candidate, MPhil, LLM, MA Hons  
Director of Program Development

[Redacted]

[Redacted]



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This email is confidential and may be privileged. If you are not the intended recipient or have received this email in error, please notify the sender immediately and delete this email. Any unauthorized copying, disclosure or distribution of the material in this email is strictly forbidden. Please note that any views or opinions presented in this email are solely those of the author and do not necessarily represent those of the company. Finally, the recipient should check this email and any attachments for the presence of viruses. The company accepts no liability for any damage caused by any virus transmitted by this email.

Please consider the environment before printing this e-mail

# EXHIBIT C

Subject: Fwd: Keep The Promise Contract

From: Brittany Kaiser [REDACTED]

Date: Thu, 12 Apr 2018 13:25:25 +0000

To: Paul Hilder [REDACTED]

Begin forwarded message:

From: "Alexander Nix" [REDACTED]

Subject: Re: Keep The Promise Contract

Date: August 12, 2015 at 22:26:46 GMT+1

To: "Levy, Larry" [REDACTED]

Cc: "Kyriakos Klossidis" [REDACTED]

"Brittany Kaiser"

[REDACTED] "Alex Tayler" [REDACTED], "Steve Bannon" [REDACTED]

Thanks Larry

Between you and me.... Kellyanne is being deliberately obtuse about this contract because she is upset with Long Island's decision to allow CA to service multiple Presidential campaigns.

She needs to be (firmly) reminded that the people that made this decision are the same people who empowered her as Head of the KTP PAC!

A

Alexander Nix  
CEO

[REDACTED]

CA Cambridge Analytica

[REDACTED]

-----  
This email is confidential and may be privileged. If you are not the intended recipient or have received this email in error, please notify the sender immediately and delete this email. Any unauthorized copying, disclosure or distribution of the material in this email is strictly forbidden. Please note that any views or opinions presented in this email are solely those of the author and do not necessarily represent those of the company. Finally, the recipient should check this email and any attachments for the presence of viruses. The company accepts no liability for any damage caused by any virus transmitted by this email.

Please consider the environment before printing this e-mail

On 12 Aug 2015, at 16:23, Levy, Larry [REDACTED] wrote:

Alexander,

Her company has had a contract with Aristotle, she didn't just start working with them instead of CA.

I'll work on the KTP I contract and try to move it along. We are bringing in another lawyer to represent KTP I, while I represent CA.

Larry

From: Alexander Nix [REDACTED]  
Sent: Wednesday, August 12, 2015 5:19 PM  
To: Levy, Larry  
Cc: Kyriakos Klosidis; Brittany Kaiser; Alex Tayler; Steve Bannon  
Subject: Keep The Promise Contract

Hi Larry

(1) We have addressed IN FULL Kellyanne's concerns regarding the original proposal, which was turned around for her attention in record time and contained 1x spelling error and 1x mis-reference (in a 15 page document)

An updated version of the original Proposal was then drafted to correct the above typos (attached)

and sent to her almost 6 weeks ago.

(2) We have already drafted a contract for Keep the Promise 1 which you have seen (attached) and includes an Appendix setting out our services

This did not contain any of the above errors (which were in the original proposal only)

(3) It was made crystal clear to Kellyanne from the beginning that KTP were to be engaging CA.

If she went ahead and engaged Aristotle, then she did so in the full knowledge that KTP was meant to be working with CA

(4) This has gone on far too long.

We need to get this contract finalised and signed by both parties before the weekend. Please can you give this your fullest attention.

Thank you

Alexander

On 12 Aug 2015, at 15:50, Levy, Larry [REDACTED] wrote:

Kyriakos,

The email from Kellyanne commenting on the contract refers to an attachment A, that she wanted more information about; in it she notes that it was addressed to Keep the FAITH, instead of keep the Promise, that it has several spelling errors, and that there is a reference to pushing out the communication through the "NY GOP outreach channels", which makes no sense because this was supposed to be a contract for services in Iowa and South Carolina. The material you sent doesn't contain any of those provisions, and it appears from the emails I can trace that the proposed contract went from Alexander Nix to Kellyanne.

I think it best to start with a new contract between KTP I and CA for services, with the polling company being a third party contractor to KTP I. That way we can move the ball through the PAC, and get Kellyanne what she needs when she is doing work for the PAC. This will also hopefully demonstrate the value proposition such that Kellyanne will want to contract directly with CA for other polling client work. She does have a long term contract with Aristotle, which is the source of most of her data now, and they have been relatively happy with that contractor. Absent the many relationships involved here she likely would not be in the market for another service provider.

Please send me a draft contract for KTP I, with an appendix that explains what services are being offered, the costs, and is otherwise responsive to Kellyanne's comments. I'll then work off of that to move the contract through the process.

Please note I'm totally booked on other matters Thursday afternoon through Sunday, so I can start on something if I get it early enough tomorrow, otherwise it will be Monday.

Larry

---

LARRY LEVY

[REDACTED]

[REDACTED]

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From: Kyriakos Klosidis [REDACTED]  
Sent: Wednesday, August 12, 2015 5:50 AM  
To: Levy, Larry  
Cc: Brittany Kaiser; Alex Tayler  
Subject: Polling Company NDA

Hi Larry,

Forwarding relevant email sent by Sabhita a couple weeks ago, assuming that this is what you were looking for?

Best regards,

Kyriakos

Kyriakos Klosidis  
Projects Coordinator  
[REDACTED]

[REDACTED]



scl commercial

scl defence

scl elections

scl social

-----  
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Please consider the environment before printing this e-mail

From: Sabhita Raju [REDACTED]  
Sent: 30 July 2015 22:31  
To: Levy, Larry [REDACTED]  
Cc: Alexander Nix [REDACTED] Kyriakos Klosidis  
[REDACTED]  
Subject: Re: KTP II

Larry

We have yet to proceed to a full contract.

Kellyann had raised concerns and asked a number of questions after we shared the two NDAs which were sent to Kevin Quinley at the Polling Company which they forwarded to you (attached for ease of reference).

Comprehensive answers to all queries raised by Kellyann were sent to her but we are still waiting for a decision by KtP on proceeding to the contract phase and on what terms (those in the proposal or different ones which could be discussed).

If I can have that discussion on the scope of the contract and costings despite being in the Cruz firewall I am happy to do so and will ensure a contract is drafted thereafter.

Sabhita

# EXHIBIT D

## Re: Trump Contract

**From:** Alexander Nix [REDACTED]  
**To:** Steve Bannon [REDACTED]  
**Cc:** Brittany Kaiser [REDACTED], "Levy, Larry" [REDACTED],  
Sabhita Raju [REDACTED], AB Tayler [REDACTED],  
Julian Wheatland [REDACTED] Robert Murtfeld  
[REDACTED]  
**Date:** Sat, 12 Sep 2015 21:29:15 +0000

Maybe Robert could also review please.

Sent from my iPhone

On 12 Sep 2015, at 22:28, Alexander Nix [REDACTED] wrote:

We have a draft of the original contract: it just needs the terms updating to reflect the new agreement.

However, given the importance, I think this needs Larry's professional input....

Brittany, by all means have a first pass, and then please send to Larry

Sent from my iPhone

On 12 Sep 2015, at 22:19, Steve Bannon [REDACTED] wrote:

Would like to get to the client NLT 9 am EDT

On Sep 12, 2015, at 5:17 PM, "Brittany Kaiser" [REDACTED] wrote:

Do you need me to begin the contract tomorrow? Happy to do it if anyone wants to give me guidance, but I think I could produce a useful first draft to be ready for Monday morning editing.

Sent from my iPhone

On 12 Sep 2015, at 19:51, Alexander Nix [REDACTED] wrote:

Dear Larry

Today we reached agreement on terms for moving forward with a pilot programme for the Trump Campaign, as follows:

- 60 day minimum trial period
- CA to meet all data analytics, modelling, psychographics, creative, and media management costs etc
- CA to commit \$250k-\$500k for media placement (digital/mail/telephone etc) amount to be confirmed
- CA receives \$1 per supporter we register (min: name, address and email)
- CA to receive 100% of donations until we are 'made whole' (media placement fee only) and then we split the 'profits' 85/15
- If CA are not made whole within 180 days the campaign commits to meet the balance of costs incurred
- AIQ to be CA's prime sub-contractor on this contract

You will note that:

- (1) It is a trial for 60 days only (but I think that it should auto renew on the same terms, until Nov 2016, unless the client terminates in writing)
- (2) CA are providing all the financing for the media spend
- (3) The fees for registering supporters have increased from \$0.62 to \$1 per name, however, the digital production and reporting fees are to be absorbed by CA (Appendix B)
- (4) Trump Campaign has agreed to your advice about underwriting the balance of costs if we are not made whole after 180 days (I added the 180 days, so if you do not think this time frame is not appropriate please amend)
- (5) The Trump Campaign has additionally agreed to:
  - Expand the targeted geographic region so that the campaign is National and not limit to IA, NH, NV and SC (Appendix A)
  - Creative control and flexibility on messaging and creative with final approval from client.
  - Tracking integration into Trump cart and "thank you page"
  - Exclusivity on the broad match search term "Donald Trump"
- Existing donor and supporter lists (name, address, e-mail, mobile, and home numbers)
- Administrative privileges for Facebook marketing
- Tracking implementation on web properties and donation cart check-out

Attached is the draft of the original contract that you prepared for us (I have amended the branding and formatting to reflect AIQ/CA)

**(1) Please can you update this to reflect the new contractual terms above**

I have also attached the Prime Sub-contractors agreement that you drafted as between CA and AIQ, who will be taking the lead on this contract on behalf of CA.

**(1) Please can you confirm that this agreement is OK to be signed / and or amend and resend**

**(2) Are there any other agreements that we will need to enter into with AIQ to protect our Client and our IP etc**

I appreciate that it is the weekend, so if you cannot look at this today/tomorrow, I wonder if you might be able to action first thing on Monday as the Trump Campaign have made it clear that they want to start ASAP and after 4 months of negotiation I don't want to lose this!!!

Thanks Larry

A

<DM-#4965604-v1-AIQ\_Cambridge\_Trump\_contract ANv.2.docx>

<DM-#4965706-v2-Clean\_draft\_CA\_nda\_3rd\_party.doc>

# EXHIBIT E

Subject: Fwd: Cambridge Analytica/ EU Exit

From: Alexander Nix <[REDACTED]>

Date: Wed, 21 Oct 2015 12:21:11 +0000

To: Julian Wheatland <[REDACTED]> ,

Brittany Kaiser <[REDACTED]>

OK 10am confirmed – please book big room and have office looking smart  
Brittany – please can you change your flight

A

Alexander Nix  
Director

[REDACTED]

SCL Group

[REDACTED]

scl commercial

scl defence

scl elections

scl social

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Begin forwarded message:

Subject: Re: Cambridge Analytica/ EU Exit

From: Arron Banks [REDACTED]

Date: 21 October 2015 08:12:12 GMT-4

[REDACTED]

To: Steve Bannon [REDACTED]

Yes

Sent from my iPhone

On 21 Oct 2015, at 13:06, Steve Bannon [REDACTED] wrote:

10 am???

On Oct 21, 2015, at 1:03 PM, "Arron Banks" [REDACTED] wrote:

before lunch

On 21 Oct 2015, at 12:55, Steve Bannon [REDACTED] wrote:

Arron : Alexander is Cambridge's CEO... he will be in the states with me but we will be dialed in by bridge line... our operating team will be at the company to present

Alexander will provide the address

What time works best for u?



On Oct 21, 2015, at 12:49 PM, "Arron Banks" [REDACTED] wrote:

Where do you want to meet Friday ?

A

Sent from my iPhone

On 21 Oct 2015, at 10:32, Steve Bannon [REDACTED] wrote:

Great

---

From: Arron Banks [REDACTED]  
Sent: Wednesday, October 21, 2015 4:55:35 AM  
To: Steve Bannon  
Cc: Matthew Richardson  
Subject: Re: Cambridge Analytica/ EU Exit

Yep I'm  
Good for Friday

Sent from my iPhone

On 20 Oct 2015, at 22:46, Steve Bannon [REDACTED] wrote:

Arron: can u do a meeting this friday?

# EXHIBIT F

Subject: Re: Alumni Burns Night Whisky Tasting Invitation

From: Brittany Kaiser [REDACTED]

Date: Tue, 10 Jan 2017 03:27:36 +0000

To: M Hunter [REDACTED]

Cc: Chad Klutts [REDACTED]

Simonds Ben [REDACTED]

James Hoobler [REDACTED]

TOTALLY THERE (the people in the British Embassy DC are lovely).

Funnily enough, the British Consulate in NYC took me out to lunch today after the meeting between FM Boris and our very own Steve Bannon... and they told me that Kelly Anne Conway came to the DC Embassy's New Years party and stayed almost the whole night!

Cambridge crew all over it.

Loves it.

On 9 January 2017 at 22:11, M Hunter [REDACTED] wrote:  
Game on Boys and Brit! If in town RSVP.

I am going.

Begin forwarded message:

From: <Shannon [REDACTED]>

Subject: Alumni Burns Night Whisky Tasting Invitation

Date: 9 January 2017 at 15:34:11 GMT-5

To: <Shannon [REDACTED]>

Good afternoon,

The Scottish Government invites you to join us for a wee dram in celebration of Burns Night.

We will be hosting a Burns Night Whisky Tasting on Wednesday, 1 February 2017 from 6:00 to 8:00 pm at the British Embassy in Washington, DC. Attached please find the invitation with more information about the event, and please send all RSVPs to Scotland.RSVP@fco.gov.uk.

We hope that you will be able to join us!

Best Wishes,

Shannon Hall  
Communications & Business Coordinator  
British Embassy



\*\*\*\*\*

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and <http://blogs.fco.gov.uk> to read our blogs.

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\*\*\*\*\*

--

Brittany Kaiser, PhD Candidate, MPhil, LL.M, MA Hons  
Director of Program Development

[Redacted]

CA Cambridge Analytica

[Redacted]

[Redacted]



<https://cambridgeanalytica.org>

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# EXHIBIT G

## In the thick of it!

**From:** Robert Murtfeld [REDACTED] >  
**To:** Ed DeNicola [REDACTED] Brittany Kaiser  
[REDACTED]  
**Date:** Fri, 02 Sep 2016 11:20:02 +0000

Dear both,

The NYC office is in the thick of it.

FYI

<https://www.washingtonpost.com/news/post-politics/wp/2016/09/01/trump-enlists-veteran-operative-david-bossie-as-deputy-campaign-manager/>

The article reads: *That leaves three Mercer allies -- Bannon, Conway and Bossie -- atop the Trump campaign. Hedge-fund investor Robert L. Mercer and his daughter, Rebekah, were key players in urging Trump to reshuffle his campaign this summer.*

Ed - Bob Mercer came by the office yesterday.

R



# EXHIBIT H



# Data and Digital Marketing Debrief: Trump for President

# Why Cambridge Analytica



## Starting from Scratch

When we started on the campaign (second week of June) the Trump Campaign had no speakable data infrastructure.

- No database of record
- Many disparate data sources
- No data science program (models)
- No proper digital marketing apparatus
- Research being done by up to 5 pollsters at one point

Any most importantly: **No unifying data, digital and tech strategy.**

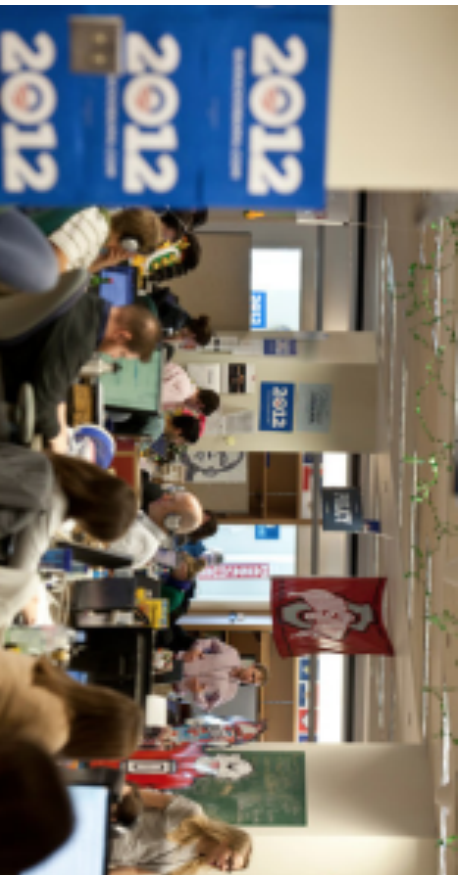




# Lessons to Keep in Mind

## Every campaign is different

This program was built specifically for Mr. Trump and the style of campaign that he ran. While many of the principles you are about to see can be repurposed for other clients or campaigns, the overall strategy must be reinvented with each new client (at this scale).



**VS**





# Campaign Stages

**START**



**DONORS**



**PERSUASION**



**GOTV**

**FINISH**



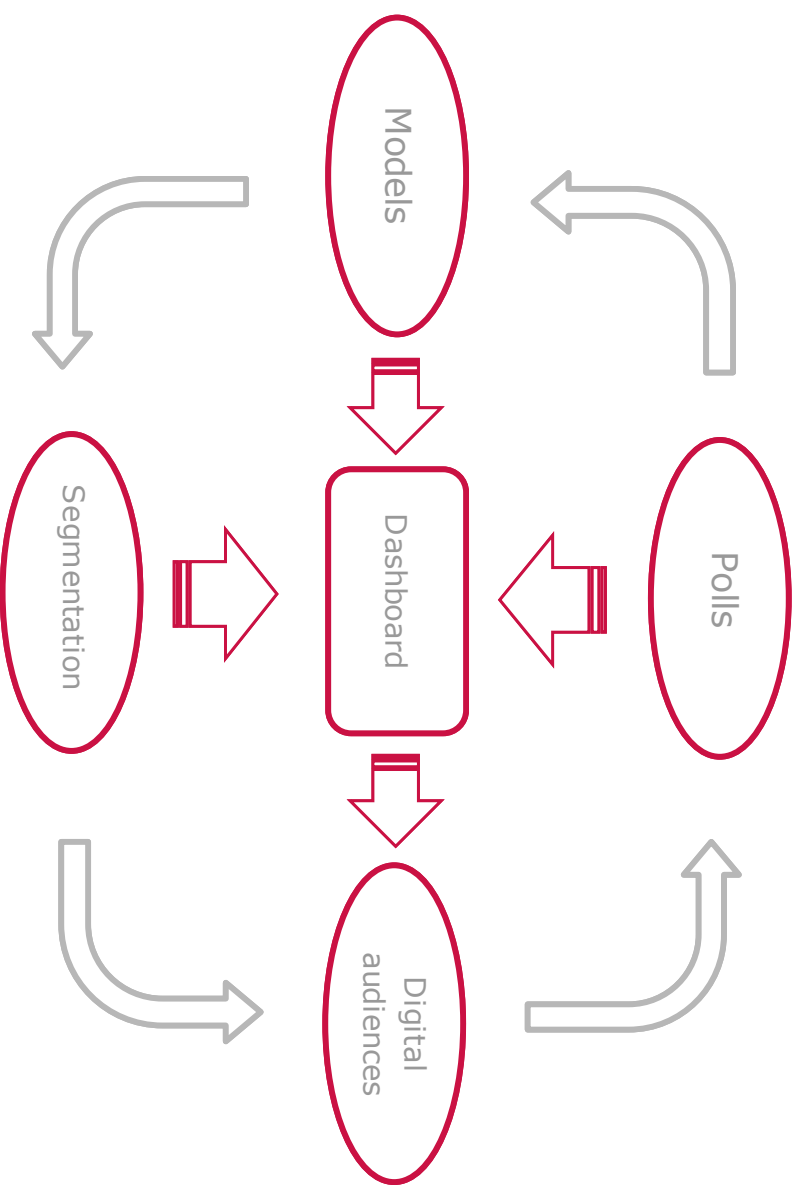


# The Data

## The process:

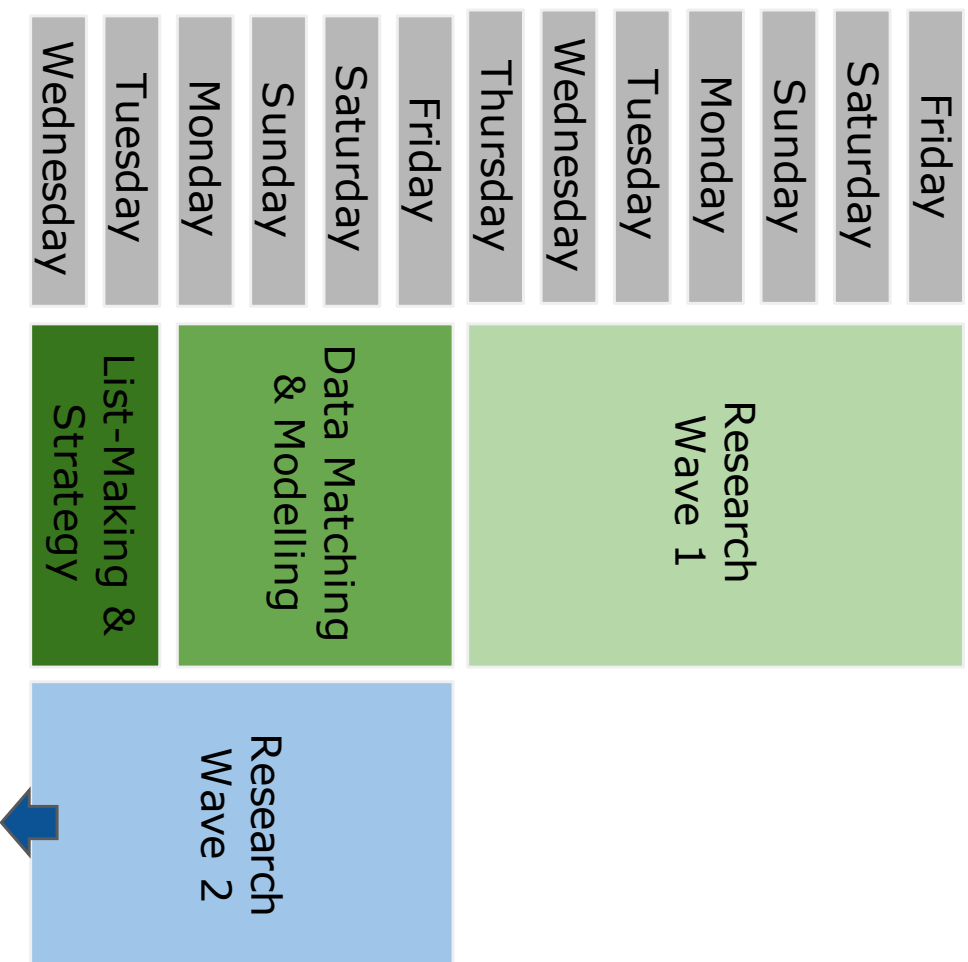
Distinct phases were undertaken which were ultimately incorporated into a weekly cycle. Every voter in each battleground state was modeled against Trump/Clinton preference, turnout, and top issues.

1. Research and polling
2. Model creation and extrapolation
3. Audience segmentation
4. Activation





# Research Methodology: Research Waves



## Why this approach?

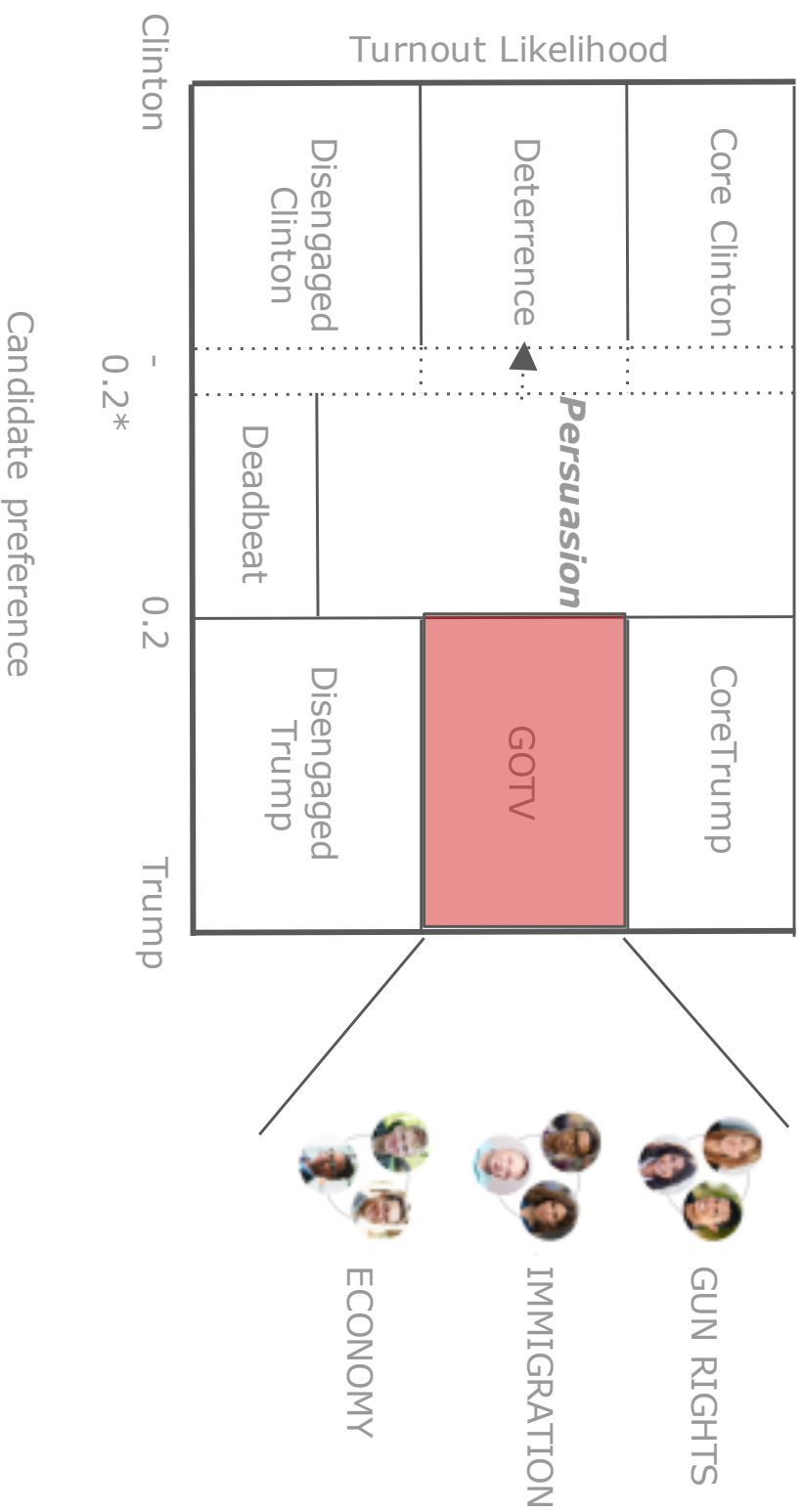
- Seven-day waves were organised to deliver the refreshed models on Wednesdays
- Originally tried two-week waves, but base size/demographic imbalances meant data was unstable and didn't work efficiently
- Longer (as above) was less stable, shorter would mean fewer completes in key states
- We shifted into five-day waves for the last 10 days, to maximise robustness of data for final predictions

## How it worked

- Fieldwork was 7 days, we aimed to achieve completes and quotas as far as possible
- High response over the weekend then we targeted remaining quotas over the week



# Audiences









## Trump for President: Digital Marketing

High eight  
figure ad spend

Billions of ad  
impressions

**5,000+**

ad

campaigns

**10,000+**

creative

iterations



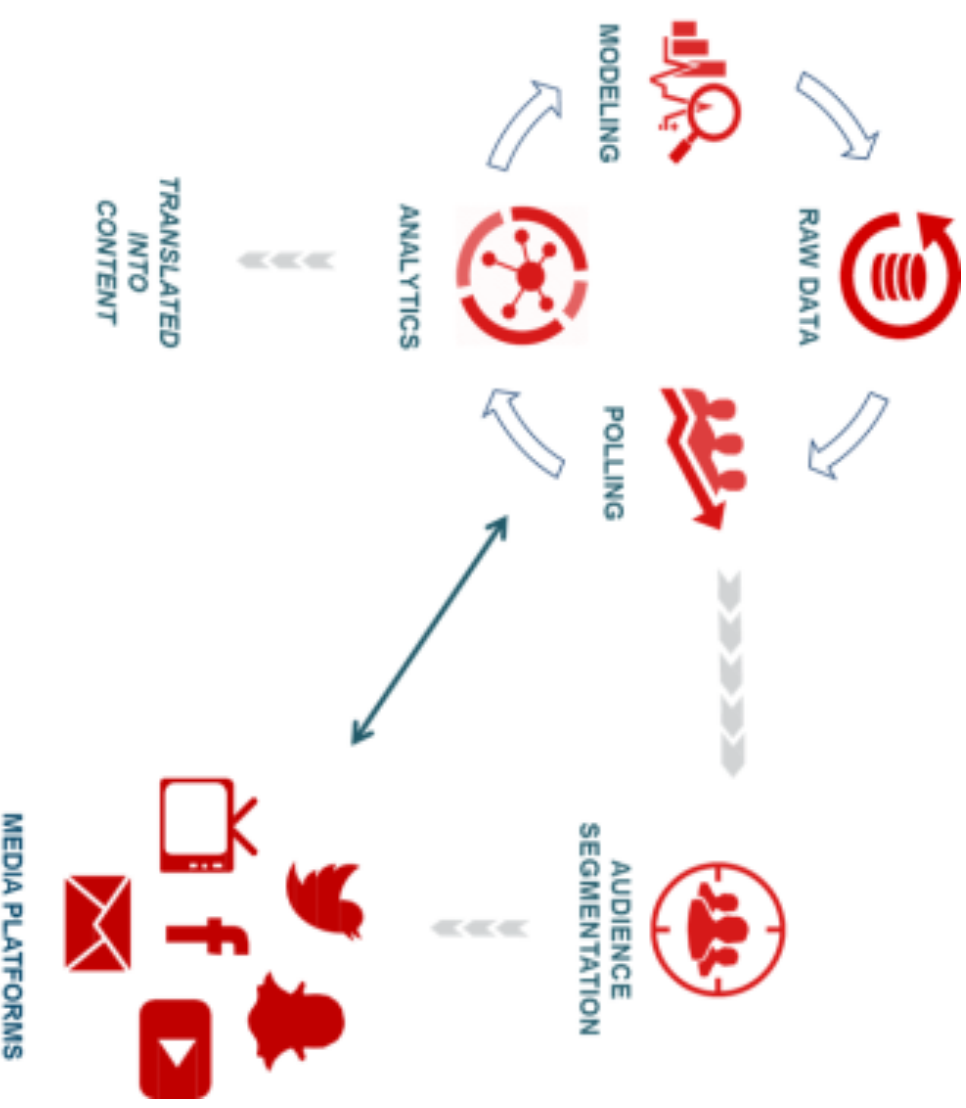
# Digital Marketing

July	August	September	October	November	Results
List Building, Fundraising					Collected 950,000 email addresses, raised \$26.5 mm
Event Promotion, Volunteer Recruitment, App Promotion					Promoted over 100 events, drove 35,000 app installations
Persuasion					1.4 billion impressions, 4,000 ad campaigns, 3% average favorability increase
		AB/EV			79.7 million impressions, drove a 2% increase in voters submitting absentee ballots
			GOTV		



# Persuasion Digital Marketing: Process

1. Ingested data and audience profiles from the data team
2. Devised communications to best promote a story to these individuals
3. Executed digital ad buys across 30+ inventory sources delivering 1.5 billion impressions





# Media Planning

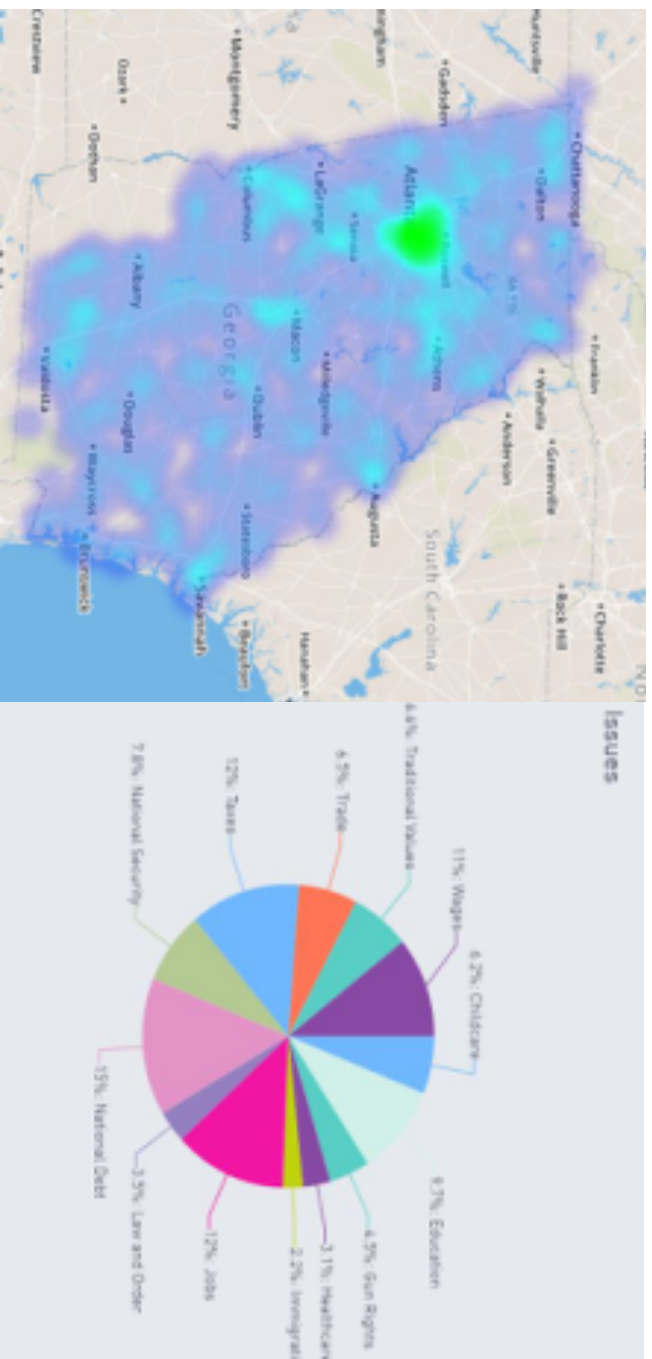
## Sample Battleground State Plan: Georgia

**Persuadable Voters:** 444,371

**Gender:** Male - 43 %, Female - 57%

**Ethnicity:** White - 76%, AA - 12%, Asian - 6%, Hispanic - 4%, Other - 2%

**Top Issues:** National Debt, Jobs, Taxes, Wages, Education, National Security





# Media Planning

## Sample Media Plan: Ad Operations

Geo	Audience	Message	Platform	Ad Type	Audience	Impressions	Budget
GA	Persuasion	Nat'l Debt, Jobs, Taxes, Wages, Education, Nat'l Sec	Video Network	Video	444,000	8,880,000	\$250,000
GA	Persuasion	Nat'l Debt, Jobs, Taxes, Wages, Education, Nat'l Sec	Facebook	Video	444,000	8,880,000	\$250,000
GA	Persuasion: Female	Jobs, Wages, National Debt	Pandora	Audio	253,080	5,061,600	\$127,000
GA	Persuasion: Female	Jobs, Wages, National Debt	Women's Interest Sites	Video	253,080	7,592,400	\$190,000
GA	Persuasion: Female	Jobs, Wages, National Debt	Women's Interest Sites	Display	253,080	7,592,400	\$50,000
GA	Persuasion: AA	Predators Video, Other?	Video Network	Video	53,333	1,066,666	\$30,000
GA	Persuasion: AA	Predators Video, Other?	Video Network	Display	53,333	1,599,998	\$25,000
GA	Persuasion: Hispanic	Jobs, Taxes, Education	Pandora	Audio	30,000	1,400,000	\$35,000
Gwinnet, Fulton, Cobb	Persuasion: Hispanic	Jobs, Taxes, Education	Video Network	Video	20,000	364,444	\$25,000
Gwinnet, Fulton, Cobb	Persuasion: Hispanic	Jobs, Taxes, Education	Mobile Network	Display	20,000	400,000	\$20,000
GA	Persuasion: Low Turnout	Nat'l Debt + GOTV	Facebook	Display	177,600	1,776,000	\$60,000
Marrietta, Atlanta, Alpharetta, Cumming	Persuasion: Geo-Scoring	Nat'l Debt, Jobs, Taxes, Wages, Education, Nat'l Sec	Local News Sites	Display	999,000	10,000,000	\$50,000
<b>Total:</b>					<b>54,613,508</b>	<b>\$1,112,000</b>	

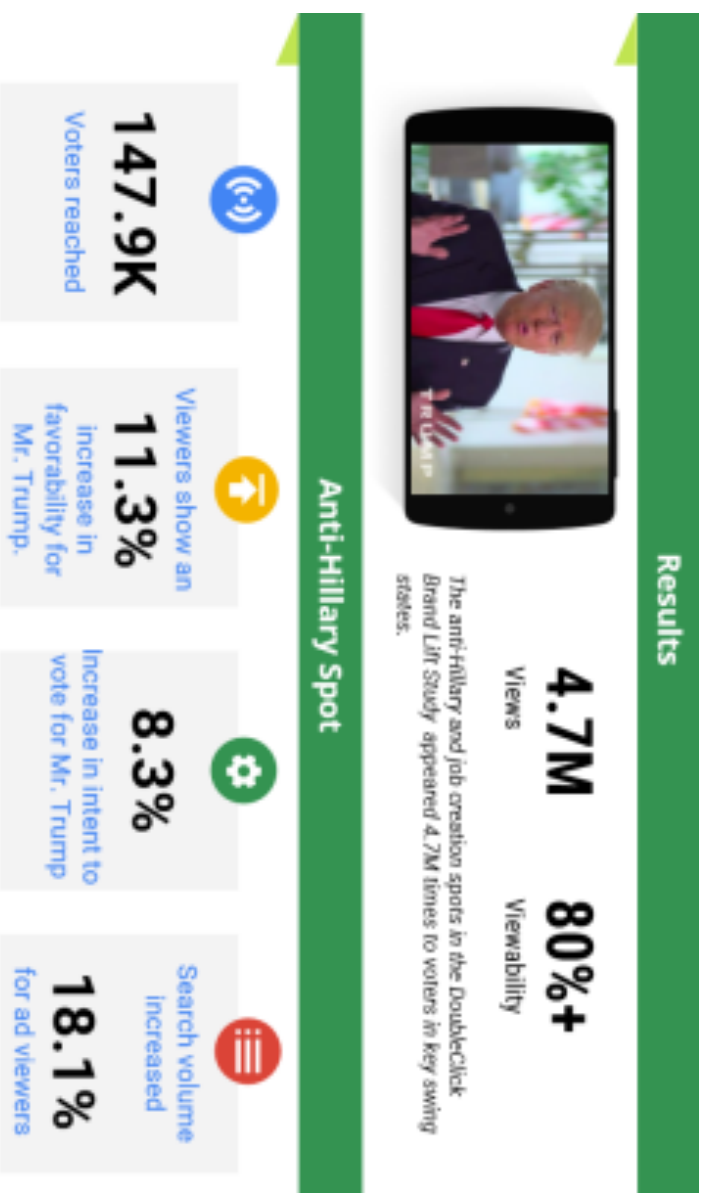


# Persuasion Measurement

1. Divided audiences into three sections using the split testing API; tested messaging approaches, ad formats, and audiences

2. Deployed the results from the test on the general population, and was also used to messaging throughout the campaign

3. Each test resulted in learnings that improved the audience's favorability and intent to vote by several percentage points





# Persuasion Measurement

## Sample Learning Agenda Test Full vs. Package (9/14-9/17)

**Donald J. Trump**

Once again, Hillary Clinton shows her true colors by saying horrible, horrible things about my supporters -- hard-working people who don't deserve to be lumped into those "basket" of men and women so, SD wrong.

**DEPLORABLE**

Speaking to wealthy donors called tens of millions of Americans **HILLARY CLINTON DEPLORABLE.**

**Donald J. Trump**

Once again, Hillary Clinton shows her true colors by saying horrible, horrible things about my supporters -- hard-working people who don't deserve to be lumped into those "basket" of men and women so, SD wrong.

Speaking to wealthy donors called tens of millions of Americans **HILLARY CLINTON DEPLORABLE.**

You could put Trump's supporters in what I call "BASKET DEPLORABLE"

132 Facebook 28 Comments 36 Shares

Like Comment Share

- Slightly better results for package vs. full (3.91 vs. 2.56 point increase) for DJT intent
- Full ad performed better at decreasing Hillary intent vs. package (4.9 vs. 2.5 point decrease) for both men and women





# Notable Ad Formats: Native

## Politico Native Ads

Sponsored content pieces saw 2-4% higher engagement than display or video; average engagement time of 4 minutes

<http://www.politico.com/sponsor-content/2016/08/inconvenient-truths-about-clinton-foundation>

The screenshot shows a mobile interface for a sponsored article. At the top, it says 'SPONSOR-GENERATED CONTENT' and 'Paid advertisement by Donald J. Trump for President'. Below this is a navigation bar with icons for 'OVERSIGHT AND REFORM', 'UPPER MIDDLE CLASS', 'MIDDLE CLASS', 'MIDDLE CLASS', 'POLITICAL CHALLENGES', 'THE FOUNDATION', 'THE FOUNDATION', 'THE FOUNDATION', 'AMERICAN INTELLIGENCE', 'FUTURE TO DISCLOSE', and 'TRUMP: CON'. The main content area features the title 'TRAVEL COSTS' and a sub-headline '1. Since 2003, The Clinton Foundation Has Spent More Than \$50 Million On Travel:'. The text below reads: 'The New York Post headline: "Bill Clinton Foundation has spent more than \$50 million on travel expenses." -Creff Earle, "Bill Clinton Foundation Has Spent More Than \$50 Million On Travel Expenses," New York Post'. The ad includes social media sharing icons (Twitter, Facebook, LinkedIn) and navigation arrows.



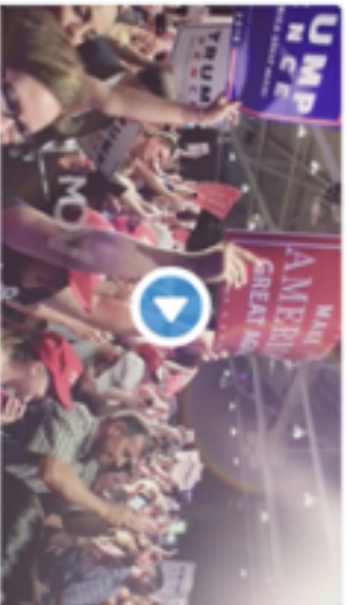
# Notable Ad Formats: Conversational

## Twitter Conversational Ads

Twitter's conversational ads to ensure that Mr. Trump's messages and hashtags were trending and being seen in the overall chatter. The below ads generated over 30,000 uses of these hashtags during the first debate, creating enough volume that tweets using these hashtags displayed in the platform in search results for Hillary Clinton.



**Donald J. Trump** @realDonaldTrump · Sep 26  
Thank you, America! This is YOUR moment and we proved we CAN take America back from a crooked and corrupt system.



Tweet #TrumpWon

Tweet #AmericaFirst

Tweet #TrumpIsWinning



**Donald J. Trump** @realDonaldTrump · Sep 26  
What is Hillary's Worst Lie? Vote Now!



Tweet #BathroomServer

Tweet #Benghazi

Tweet #PayToPlay

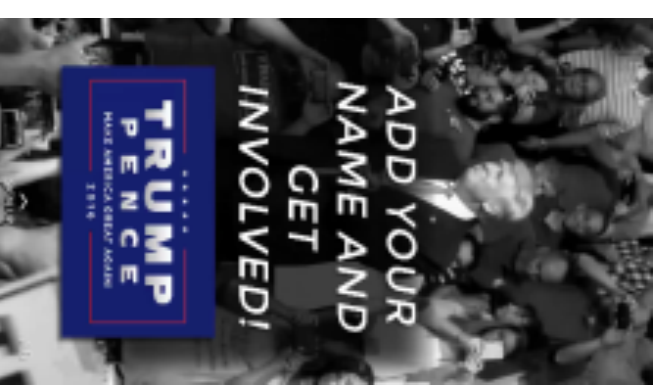
Tweet #SheCantTellTheT...



## Direct Response

### List building: Snapchat

- Ran Snapchat's new webview ads and received \$2-3 CPA's, engaging a different audience
- Post-campaign analysis showed that these were not donors, but valuable engagement contacts



# Persuasion Search Advertising



**Search Query:** *Trump Iraq War*

**Hillary Voted For The Iraq War - Donald Trump Opposed It**  
Ad [www.donaldjtrump.com/iraq](http://www.donaldjtrump.com/iraq)  
Crooked Hillary voted for the war in Iraq as a New York Senator. Bad Judgment!

**Control The First Impression**

**Search Query:** *Hillary Trade*

**Hillary Clinton Supports NAFTA - She Will Ship Jobs Overseas**  
Ad [www.lyingcrookedhillary.com](http://www.lyingcrookedhillary.com)  
Hillary Clinton's Trade Deals Destroy American Jobs. No More Bad Deals.

**Go Negative on Hillary's Positions and Expose Scandals**

**Search Query:** *Trump Economic Plan*

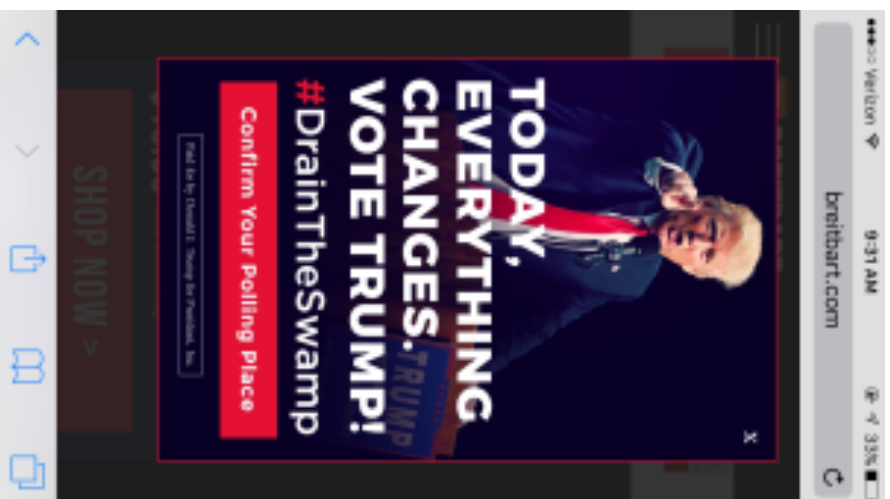
**Donald Trump For President - See His Full Economic Plan**  
Ad [www.donaldjtrump.com/Economy](http://www.donaldjtrump.com/Economy)  
Donald Trump will fix America's rigged economy. See the full plan here.

**Drive Traffic To Relevant Issue**



# GOTV

## Interstitial



## Social



## Search

<p><b>Donald Trump For President</b> <b>Absentee Ballot Request</b> <a href="http://www.vote.gop/absentee/arizona">www.vote.gop/absentee/arizona</a> Voting has begun in Arizona. Request your Absentee ballot and vote Trump...</p>
<p><b>Want To Vote For Donald Trump?</b> <b>Request Your Absentee Ballot</b> <a href="http://www.vote.gop/absentee/arizona">www.vote.gop/absentee/arizona</a> Absentee Voting has begun in Arizona. Request your Absentee ballot now.</p>
<p><b>Vote Trump In Arizona</b> <b>Request Your Absentee Ballot</b> <a href="http://www.vote.gop/absentee/arizona">www.vote.gop/absentee/arizona</a> Voting has already begun in Arizona. Request your Absentee ballot now.</p>

# GOTV



1. Ran advertising to individuals that we knew were supporters and needed to be turned out
2. Maintained an offline integration through Datatrust to ingest live ballot results into Facebook to exclude voters and follow up on individuals that had not yet turned in their ballots (and excluded voters from all offline models)
3. Conducted offline attribution and held a control of individuals that were not exposed to the ads; study of over 100,000 voters showed an incremental lift of nearly 2%

# Big Ticket Items







## YouTube Mastheads

Displayed  
different versions  
of the masthead  
depending on  
location of the  
site visitor

**Today, Nov. 8th**  
**Everything Changes**  
Get to know Donald Trump from some of his closest supporters.

[Learn More >](#)

 Ivanka Trump Businesswoman <b>STRENGTH</b>	 Willie Robertson Duck Dynasty <b>MIDDLE CLASS</b>	 David Clarke Sherrif <b>JUSTICE</b>	 Marcus Luttrell Retired Navy Seal <b>MILITARY</b>	 Dana White President, UFC <b>BUSINESS</b>
--	---	---	---	---

Close Ad

**Today, Nov. 8th**  
**Everything Changes**  
Today is one of the most important and historic elections in our nation's history. Today is your chance to be heard. Your chance to make a better America – a brighter America – for everyone. Get up. Get out. **VOTE.**

**Find Your Local Polling Place:**  
eg: 390 Valencia St. San Francisco, CA 94103

[Search & Expand](#)



Close Ad



# Supporter Mobilization

## App installation:

Promoted over 35,000 installations of the America First App, running campaigns on Pandora, Facebook, Twitter, and Google.

## Crowd building:

Promoted hundreds of events online, sometimes driving crowds with a day's notice.

## Volunteer Recruitment:

Recruited hundreds of volunteers in key battleground regions to support field operations

The screenshot shows a social media post titled "Suggested App" for the "America First" app. The app is sponsored by "America First". The post text reads: "Download the official 'America First' app to get the latest campaign news, events and more! Connect with other Trump supporters and earn points for taking action to help Make America Great Again!". Below the text is a promotional image for the app. The image features two smartphones displaying the app's interface. Text on the image says "Download Today" and "Download the Donald Trump for President app! Get it on Google Play". An "Install Now" button is visible at the bottom of the image. Below the image, the post shows engagement metrics: 1.9K likes, 177 comments, and 302 shares. At the bottom of the post are buttons for "Like", "Comment", and "Share".



# Trump's Data Team Saw a Different America — and They Were Right

## The president-elect's analysts picked up disturbances others weren't seeing — the beginning of the storm that would deliver Trump to the White House.

by **Joel Green** and **Sasha Issenberg**

November 10, 2016, 5:00 AM EST

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### How a little-known data firm helped Trump become president

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### TRUMP'S BIG DATA MIND EXPLAINS HOW HE KNEW TRUMP COULD WIN



**Carl Bialik**  
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**@CamAnalytical's** polls showed evidence of a shy Trump vote, but much of it had dissipated by Election Day. [liveshrtyvght.com/features/shy-v/](https://www.bloomberg.com/features/shy-v/)

Finally, Trump's own pollsters told us that their secret's nearly shy Trump voters by Election Day. A few months before the election, internal polling showed Trump getting about 3 percentage points more support in polls conducted online or by automated voice recording than in live calls, according to David Wilton, data scientist for Cambridge Analytica, a data-analysis firm that conducted polling for the campaign. That suggests Trump supporters were reluctant to reveal their true preferences to a telephone interviewer. But in polls conducted just before Election Day, that 3-point gap had narrowed to just 1 or 2 points. "By Trump voters started to come out of the woodwork during the course of the election," said Matthew Greenwald, director of product for Cambridge Analytica.



Thank you



# EXHIBIT I



# Make America Number One After Action Report

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November 2016

## Summary

Cambridge Analytica (CA) delivered data modeling, television targeting and placement, digital ad targeting and delivery, list building, and polling to Make America Number One's (MAN1) project "Defeat Crooked Hillary" (DCH) during 2016's Presidential election. During that time, CA delivered millions of ad impressions nationwide, with a special focus on New Hampshire, Pennsylvania, Virginia, North Carolina, Florida, Ohio, Iowa, Colorado, Nevada, and Michigan.

## Data Modeling

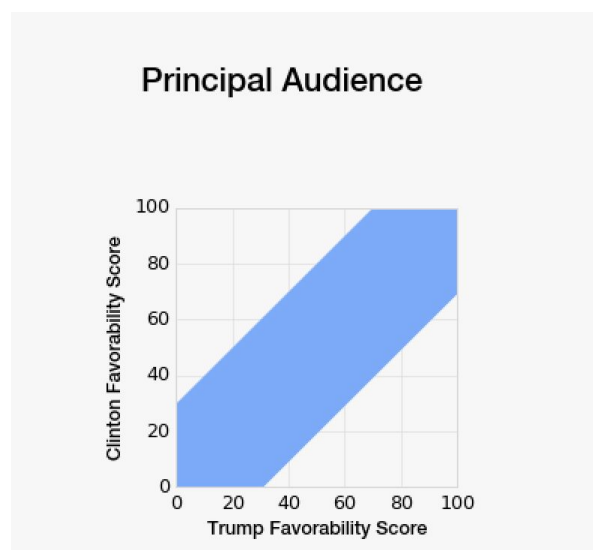
The primary effort of the data operation was to produce the Principal Audience (PA): the group of voters modeled to be the most likely to be persuaded by advertising, and who accordingly received the bulk of MAN1's messaging efforts. This was done by:

1. Constructing models predicting Trump and Clinton favorability using the survey data collected by MAN1
2. Extrapolating those models to all possible voters in the target states
3. Prioritizing voters by their likelihood to vote

This allowed MAN1's advertising efforts to be enormously efficient by not wasting money on voters whose predispositions were such that persuasion messaging would not move their allegiance, and not wasting ads on voters who are unreliable at best, and unlikely to vote at worst.

The figure below shows how the PA was defined for a particular set of Trump and Clinton favorabilities. Voters who fall within the blue bar are voters within our PA. These voters are most likely to be open to persuasion messaging chipping away at their enthusiasm for supporting Clinton, or switching their vote to Trump.

The actual size of the audience can be changed at will simply by expanding or contracting the width of the blue band in the figure. Generally, the audience was constructed to have about 9 million people in it, although, frequently they were further sub-segmented.



A wide range of techniques from modern predictive analytics were used in this process. The resulting models proved to be quite accurate, both with respect to internal validations and subsequent ad impact surveys demonstrating the effectiveness of messages on this audience. These models were updated each time a new survey was completed and the PA changed accordingly. Additionally, the data was scrubbed regularly during absentee and early voting in applicable states. Records of voters who had cast their ballot in person, or returned their absentee ballot were matched against the PA. Those who had successfully voted were removed for future message delivery and turnout efforts via digital ads. This meant the 72-hour GOTV phase of MAN1's efforts were highly efficient.

While the PA determined who would be receiving messaging, the next step was to determine what the messaging should be. Content was informed by a combination of Cambridge Analytica's in-house issue models, ad impact surveys conducted by the digital department, and issue polling included in MAN1 surveys. These surveys are elaborated upon in the next section.

## *Polling*

Cambridge Analytica conducted two target state surveys of registered voters, and two additional national surveys intended for a better understanding of the electorate. A survey of target states conducted in July of 2016 by MAN1 was also used. These surveys took a mixed method approach, combining online and telephone (IVR) surveying methods and employing strict demographic quotas to ensure a representative final sample. The data was then matched back to CA's database in order to precisely weigh the results. Weighting allowed us to control for sampling biases, method error across demographics, and general election turnout propensity (via our general election turnout model). Potentially biasing questions were placed at the end of the survey to avoid impacting respondents and to minimize incompleteness rates. All questions on candidate negatives were paired with questions on positives so surveys appeared politically neutral overall, and would best encourage honest responses.

The key objective in the target state surveys was to update the favorability models and to inform our specific messaging. The questions informing ad content took two form:

1. **Segment Creation:** Questions on issues framed so as to identify individuals with strong feelings one way or another. Responses could then be modeled and extrapolated to find other like-minded individuals who may be more susceptible to a certain message. e.g. 'Do you feel healthcare has gotten worse in the last eight years?'. When modeled and extrapolated, data collected on this question allowed us to identify an audience well-suited to an attack on this issue. A second example is the question 'Do you feel the system is rigged by big money?' According to responses, the majority of voters feel the system is rigged, regardless of whom they support. Messaging based on this could be sent to the entire audience rather than needing a tailored segment.
2. **Motivational Messaging:** Questions asking respondents how they felt about a potential attack angle so that we could assess which areas produced more movement. For instance, in the September MAN1 poll we were able to determine that all voters, regardless of partisanship or ballot preference, were influenced by a Clinton corruption narrative. Thusly, a majority of MAN1's messaging was corruption focused. Further, we were able to drill down another level, asking how voters felt about Clinton after reading a statement about her email scandal, and a statement about misdeeds at the Clinton Foundation. The results indicated the statement about the misdeeds at the Clinton Foundation moved more Clinton supporters away from her than the statement about the email scandal. This gave MAN1 a clear path to dissuading Clinton supporters from voting for her by delivering ads attacking her involvement with the Clinton Foundation.

Beyond modeling and advertising, we also computed a weighted popular vote breakdown across the sampled states for each survey and estimated the likely electoral college results. We were able to gain further insight by cross-tabulating ballot preference with responses to questions on voting likelihood, qualities desired in a President, opinions on US politics today compared to yesterday, candidate favorability, movement based on key issues, and broad demographics. As a testament to this methodology, in our October poll we had Trump leading in NC, FL, and OH, which ran contrary to many pundits' opinions but was ultimately correct. This speaks to the power of being able to weight polls based on individual characteristics that would be unknown to a typical pollster.

## Digital Advertising

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### Overview

The Defeat Crooked Hillary digital advertising campaign was very successful in its ability to reach and persuade undecided voters. Overall, ads were served 211,718,189 times, drove 1,433,331 users to [defeatcrookedhillary.com](http://defeatcrookedhillary.com) and [2016truths.com](http://2016truths.com), and generated more than 25 million video views. Our ads saw the most success on Facebook and Google Search and ad spend was reallocated accordingly.

Throughout the campaign we ran several Ad Recall and Impact Surveys to measure the effectiveness of our ads in persuading voters. These helped to test whether people in our target audience remembered seeing our ads and whether the messaging had the intended effect (decreasing favorable opinion of Hillary Clinton).

We found that most videos not only decreased the favorability of Hillary Clinton, but more importantly they increased the intent to vote for Donald Trump.

The success of our campaign can be attributed primarily to the high percentage of users in our principal audience that we were able to match online (approximately 66%) and the strength of video and display creative.

### Performance by Platform

Platform	Impressions	Link Clicks	CPC	CTR	Video Views	CPM	Spend
Facebook	81,094,069	429,699	\$3.65	0.53%	23,632,775	\$19.33	\$1,567,263.27
TrueView	6,606,480	14,862	\$14.81	0.22%	1,201,391	\$33.33	\$220,164.02
Search	8,070,862	238,069	\$1.65	2.95%	-	-	\$392,975.62
Pre-Roll Video & Internet Radio	16,101,254	47,989	\$6.46	0.30%	5,691,956	\$19.25	\$309,946.19



Display	95,771,411	682,630	\$1.45	0.05%	-	\$0.22	\$21,003.09
Twitter	713,163	20,082	\$0.37	2.82%	-	\$10.45	\$7,453.82
<b>Snapchat</b>	3,360,950	-	-	-	204,353*	\$6.22	<b>\$20,900.00</b>
<b>Total</b>	211,718,189	1,433,331	\$1.74	0.68%	25,038,519.00	\$11.77	\$2,492,684.31

## Facebook

Over the course of the campaign our ads were seen 81 million times, reaching 13.2 million voters, on average more than six times each. Of those 13.2 million voters, more than half took an action (click, like, comment, etc.) on our ads, higher than other successful campaigns. 9.84 million times users viewed more than 10 seconds of our videos. On average users watched 20.4 percent of our videos, more than five percentage points above similar campaigns. Overall, our ads drove 429,699 visits to defeatcrookedhillary.com.

Video	Impressions	Reach	Freq.	10s Views	10s View Rate	Link Clicks	CPC	CTR	Spend
Do Nothing	6,250,663	2,270,711	2.75	1,079,583	16.59%	31,968	\$4.15	0.51%	\$132,579.03
NAFTA	5,158,057	2,080,126	2.48	529,648	9.75%	28,932	\$3.43	0.56%	\$99,186.21
Can't Run Her House	2,310,081	1,229,935	1.88	237,663	8.04%	13,025	\$4.56	0.56%	\$59,418.32
Equal Pay	6,716,760	2,062,332	3.26	946,799	18.12%	11,171	\$12.21	0.17%	\$136,404.48
Benghazi	3,729,888	1,853,954	2.01	650,286	19.71%	25,480	\$2.54	0.68%	\$64,776.33
SCOTUS-Evangelicals	2,465,506	742,781	3.32	314,201	12.74%	9,689	\$7.26	0.39%	\$70,346.12
How To Lie	2,300,861	442,868	5.2	243,438	10.58%	-	\$7,778.37	-	\$54,448.56
FALN	2,353,011	454,780	5.17	263,642	11.20%	-	\$18,149.85	-	\$54,449.54
NAFTAv2	615,368	331,201	1.86	107,113	17.41%	2906	\$2.84	0.47%	\$8,250.00
SCOTUS	4,657,418	1,792,089	2.6	637,720	10.10%	18168	\$3.23	0.39%	\$58,745.02
Shut It Down	1,660,268	971,520	1.71	296,643	17.87%	10457	\$3.59	0.63%	\$37,499.83
The Cut	1,691,831	1,012,334	1.67	333,300	19.70%	11023	\$1.70	0.65%	\$18,747.15
Obama-The Game	3,062,342	908,024	3.37	400,038	13.06%	-	\$7,223.28	-	\$79,456.09
Bernie Never	1,492,966	1,153,878	1.29	338,421	21.18%	3914	\$5.22	0.26%	\$20,425.93

Had A Chance									
Clinton Foundation Fails on Equal Pay	1,160,382	731,258	1.59	289,090	24.91%	2549	\$2.14	0.22%	\$5,467.00
A Danger to National Security	1,183,623	823,848	1.44	152,495	12.88%	12301	\$1.69	1.04%	\$20,785.04
Corruption is a Family Business	1,361,408	867,901	1.57	152,755	11.22%	13265	\$1.76	0.97%	\$23,290.34
Race of a Lifetime	673,559	502,122	1.34	94,984	14.10%	2887	\$4.06	0.43%	\$11,728.21

The video titled ‘Can’t Run Her House’ was very effective in persuading women in our principal audience not to vote for Hillary Clinton. After conducting an Ad Recall and Impact Survey we found that the ad was especially effective in the State of Florida by increasing intent to vote for Donald Trump by more than 8 percentage points.

The videos titled ‘How to Lie’ and ‘FALN’ were also very effective in persuading voters, with 7.7 percent and 7.8 percent respectively, increasing intent to vote for Donald Trump among users in our principal audience. These videos were shown to a subset of our principal audience that viewed national security as one of their top three most important issues.

When the video titled ‘SCOTUS’ was shown to our audience of evangelical voters, we saw little effect in changing Hillary Clinton’s already high unfavorability rating. However, after conducting our Ad Recall and Impact Survey, Evangelicals aged from 18 to 24 had increased their very unfavorable rating of Hillary Clinton by 10 percent.

The video titled “Equal Pay” was very effective in decreasing intent to vote for Hillary Clinton and increasing intent to vote for Donald Trump among women. It was especially effective with women over the age of 65, with a 12.68 percentage point increase in intent to vote for Donald Trump. There was a 6.6 percentage point decrease in intent to vote for Hillary Clinton among women aged 35-44.

## TrueView

Our ads performed very well on YouTube’s skippable TrueView inventory with a completed view rate (CVR) of 17.69 percent, higher than the standard CVR for political campaigns of 15 percent. Overall, our videos were seen 1,201,391 times at a cost of \$0.17 per view. This is on the high end for what we generally see with political campaigns and increased as we approached the end of October. Because of this, we shifted budget to Facebook and search where our ads saw better performance.

Video	Impressions	Link Clicks	Video Views	CPV	CVR	Spend
<b>Bernie Never Had a Chance</b>	311,684	528	109,251	\$0.09	35.05%	9,534.79
<b>Clinton Fatigue</b>	2,253,635	7,469	391,666	\$0.16	17.38%	62,190.73
<b>Corrupt and Dangerous</b>	839,593	1,324	147,489	\$0.21	17.57%	31,614.60
<b>DoNothing</b>	1,613,437	3,652	358,501	\$0.12	22.22%	43,261.13
<b>Can't Run Her House</b>	29,143	35	4,868	\$0.27	16.70%	1,327.71
<b>Obama - The Game</b>	37,564	24	5,930	\$0.31	15.79%	1,832.61
<b>A Danger to National Security</b>	167,639	194	21,302	\$0.29	12.71%	6,184.12
<b>Corruption is a Family Business</b>	249,714	239	37,687	\$0.27	15.09%	10,321.55
<b>A Race of a Lifetime</b>	773,809	1,002	77,206	\$0.45	9.98%	34,702.70
<b>The Cut</b>	330,262	395	47,491	\$0.40	14.38%	19,194.07

The video titled “Race of a Lifetime” had the lowest video completion rate (CVR) of 9.98%. This likely due to its slow start, whereas the video “Do Nothing” started very strong and had one of the highest CVRs for 30 second videos at 22.22%.

## Twitter

We ran two campaigns, one to grow our number of followers and another to promote key tweets. The follower campaign generated 7,781 Twitter followers at cost of \$0.79, on the low end for similar campaigns.

Twitter	Impressions	Engagements	Cost Per Engagement	Engagement Rate	Followers	Cost Per Follow	Spend
<b>Let's Stop Hillary Clinton</b>	713,163	31,851	\$0.23	4.47%	7,840	\$0.86	\$7453.82

## Display

Overall our display ads drove 14,455 clicks to defeatcrookedhillary.com. Ads ran primarily in news articles that mentioned Hillary Clinton. Such sites include: politico.com, drudgereport.com, cnn.com, realclearpolitics.com, and cbsnews.com.

Display	Impressions	Link Clicks	CPC	CTR	Reach	Frequency	CPM	Spend
Wikileaks	1,975,224	1,645	\$2.69	0.08%	-	-	\$2.24	\$4,422.73
Do Nothing	22,551,748	11,468	\$1.29	0.05%	-	-	\$0.66	\$14,834.94
Stop Hillary - Sign Up	2,026,686	1,342	\$1.30	0.07%	-	-	\$0.86	\$1,745.43

## Search

Overall, our search campaign drove 238,069 visits to our landing pages and generated more than 26 million search impressions. Ads were delivered in key states and surely hindered the fundraising efforts of the Clinton campaign. Many clicks to 2016truths.com came from users searching for keywords such as: “Hillary Clinton” and “Hillary Clinton Campaign.” The keyword that generated the largest number of clicks to 2016truths.com was “Hillary Clinton Emails” and to defeatcrookedhillary.com “latest on Clinton email.” Combined, our cost-per-click was \$1.65, which is very low for this type of campaign. The strong performance of the search campaign can be attributed to the high Quality Score (relevancy to a user’s search query) our ads received for the keyword “Hillary Clinton.”

The ad that drove the most clicks read “Confused about Hillary’s past? Learn the truth.”

Search	Impressions	Link Clicks	CPC	CTR	Avg. Position	Top Keyword	CPM	Spend
2016 Truths	6,780,239	214,615	\$1.51	3.17%	1.1	Hillary Clinton Emails	\$47.72	\$323,579.71
Defeat Crooked Hillary	1,290,623	23,454	\$2.96	1.82%	1.5	latest on clinton email	\$53.77	\$69,395.91

## Pre-Roll & Internet Radio

Our ads also ran on pre-roll, non skippable inventory across the web, utilizing platforms such as Google’s DoubleClick Bid Manager, MobileWalla’s mobile ID solution, and Pandora internet radio’s inventory in key states.

Ads ran on various news and related sites across the web, such as: foxnews.com, msn.com, cnn.com, weather.com, and yahoo.com.

Pre-Roll (Non-TrueView)	Impressions	Link Clicks	Video Views	CPV	CVR	Spend
Hillary Is Still Lying	1,619,552	356	1,268,627	\$0.02	77.00%	\$22,232.21
Clinton Foundation Fails on Equal Pay	1,458,615	472	1,123,151	\$0.02	78.33%	\$22,226.58
Bernie Never Had A Chance	411,446	103	438,989	\$0.01	83.10%	\$3,755.32
Mobilewalla	5,183,449	33,056	2,088,725	\$0.06	40.30%	\$117,035.53
Pandora - Audio	6,649,746	10,197	-	-	-	\$16,269.52
Pandora - Video	778,446	3,805	-	-	73.67%	\$128,427.02

## SnapChat

Our SnapChat filter was available to users across the state of Pennsylvania on Election Day. The filter was used by 204,353 SnapChat users and was seen 3,360,950 times. Overall, users engaged with the filter 2,354,144 times across the state of Pennsylvania.

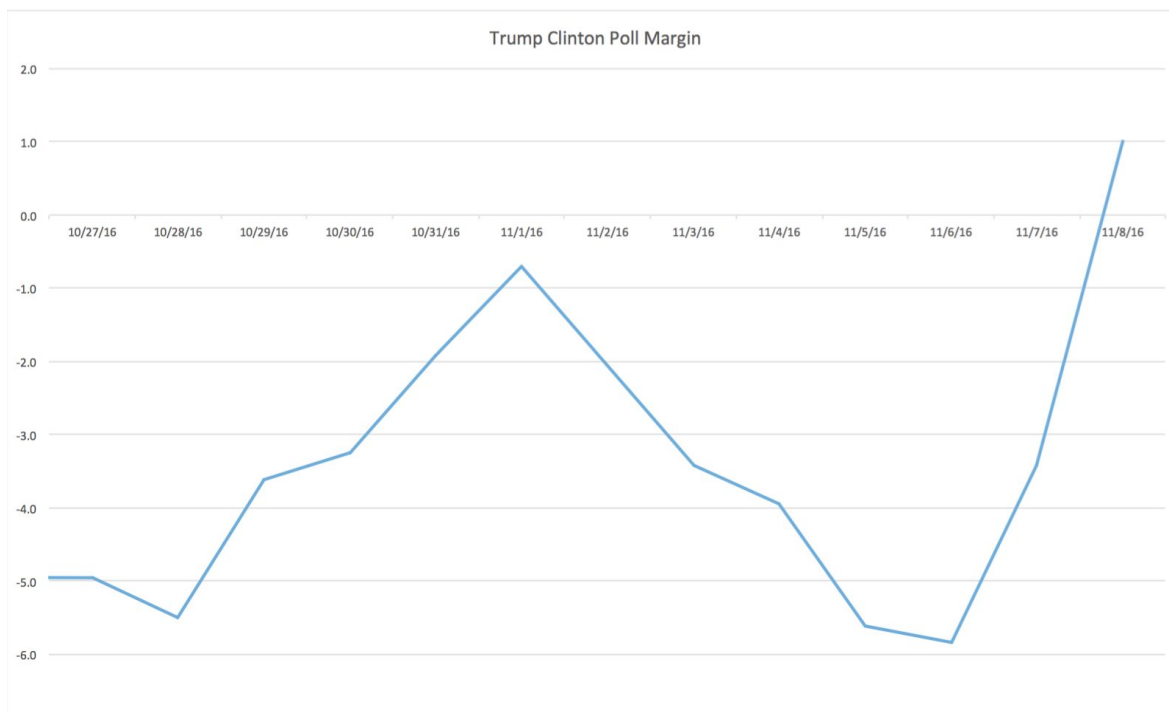


## Michigan Impact

Thursday before Election Day, MAN1 secured a donation for immediate ad spend. Based on last minute public polling numbers, the decision was made to invest that donation into 72 hour voter turnout in Michigan. We went up with the top performing ads from other target states from Friday, 11/4 through Election Day. Over the first 48 hours, engagement on the videos skyrocketed to over three million hits. Before Election Day even arrived, we had delivered 6 million impressions to conservatives statewide, to encourage turnout.

Looking at the below graph of tracking polling made available to CA after Election Day, we can see an important trend over the final days of the race. This graph follows indicated Trump support, with the 0.0 indicating a tie between Trump and Clinton. As we can see from this trendline, Trump's support was affected by the 10/27/16 announcement by the FBI that they would be reopening the investigation into Clinton's secret server. It took two to three days for that announcement to saturate and boost Trump's numbers, before they started to fall down to -5. However, with our ads starting on the afternoon of 11/4/16, you can see the same turnaround time leaving Trump tied to +1 on Election Day.

We now know Michigan to be the narrowest margin of victory for Donald Trump; 47.6 percent Trump / 47.3 percent Clinton according to the New York Times. If MAN1 had not made the final GOTV investment in the state, we can reasonably argue Trump would not have achieved his historic victory in Michigan.



## Creative

Over the course of the election cycle, from July to November, Cambridge Analytica produced all of the creative behind Defeat Crooked Hillary's ad campaigns. In that five month span, 14 different ad campaigns were run, each including a minimum of 12 creative pieces, totaling over over 170 individual ads. These ads were distributed by the CA digital team and were interacted with by tens of millions of users online.

Along with standard digital ads, CA also designed and sent out personalized email campaigns, advertised on Snapchat, Twitter and Facebook, and designed infographics to clearly display our data models to the press, and donors.

CA was also responsible for running the shareable creative pieces behind the Super PAC's multiple social media accounts in order to organically attract new activists, users and donations. In this effort, CA designed 48 unique graphic images for each social media account which received tens of thousands of online interactions.

In addition to advertising and social media, CA was responsible for the design and management of all three websites linked to the Super PAC; Defeat Crooked Hillary, 2016 Truths and Save the Supreme Court. These websites were designed and targeted to very specific audiences and were each managed accordingly. Defeat Crooked Hillary served as the main, overarching website where people could interact directly with the Super PAC, learn about our messaging, donate and more. 2016 Truths was designed specifically for individuals that were interested in fact-checking Secretary Clinton on debate nights. When users Google searched "Hillary Clinton" and other Clinton terms, the 2016 Truths site was one of the first to appear. Save the Supreme Court was built to educate voters, especially conservatives and Evangelicals, on the effects a Clinton Presidency could have on the SCOTUS and inevitably encourage them to cast a ballot against her. All of these sites were incredibly successful (see above digital metrics) in those efforts and each helped gather user information for remarketing campaigns, and email signups for MAN1 call-to-action and donation conversion.

Below are examples of the design work that was completed by CA in the form of digital ads, organic graphics and website development.





## *ABEV Test*

During the second week of Early Vote, CA created a segment from our principal audience of previous absentee or early voters who had yet to cast their ballot. We targeted this segment with Facebook display ads chasing their vote with variations of “Vote Now” static ads. Overall, we reached 638,847 AB/EV voters in key states more than 6.15 times each.

While this test was intended to give us insight into the effectiveness of different messaging motivators, we only reliably found a higher likelihood to vote amongst the segment who received these additional advertisements. Moving forward, revisiting this test could be worthwhile to pinpoint what type of language and/or graphics encourage voter turnout, specific to demographic, geography, and personality type.

## *List Building and Organic Audience*

Building a loyal and interactive presence on social media was key to MAN1’s success in reaching and influencing as many potential voters as possible. Cambridge Analytica’s (CA) digital and creative team built a Twitter profile, Facebook page, and YouTube account that effectively and organically interacted with and influenced tens of millions of Americans.

The creation and regular usage of the Defeat Crooked Hillary (DCH) social media accounts gave MAN1 a channel to directly communicate their message and develop a strong, organic presence online. Each account was utilized to further MAN1’s goals across a more diverse landscape in a non-formal and sharable way. These channels also allowed CA to outsource MAN1’s messaging for distribution to those most passionate about the cause.

On Twitter and Facebook, the production of nearly 1,000 posts enabled the accounts to reach millions of Americans. These posts were specifically designed to persuade followers to take action, educate them on current happenings of the campaign, promote MAN1’s content and campaign rapid response.

Utilizing Facebook, CA garnered a substantial following for the DCH page and gained a valuable source of imparting MAN1’s messaging. With over 50 million people reached, millions of post engagements and tens of thousands of “Likes”, the page enabled MAN1 to directly engage individuals on a channel they use to gather and distribute messaging daily.

CA’s digital and creative team also employed the handle “[@HillarysCrooked](#)” on Twitter to accumulate over 1.5 million impressions, 20,000 Retweets, 22,000 likes, and more than 8,400 followers.

The addition of a YouTube account enabled CA to post advertisements produced by the Super PAC online for easy access. DCH's YouTube account gained 1,100 subscribers and its' 35 videos received over 3 million views. Partnered with the 24 million views received from sharing the videos on DCH's Facebook and Twitter accounts, the videos received almost 28 million views online alone.

A major contribution to the effectiveness of MAN1's social media presence was CA's team closely monitoring the status and actions of the Clinton campaign and election in order to react in real-time. As news broke, followers and viewers were quickly provided updates and information from MAN1's social media accounts, thus legitimizing the channels.

The effort, effectiveness and precision of the CA team was demonstrated by their preparation and swiftness of response to the happenings of the campaign. During times of optimal traffic, CA was prepared to break through the increased levels of user interaction to maximize the reach of the SuperPAC.

For each Presidential and Vice Presidential debate, debate documents were drafted in advance that included nearly 100 pre-made posts, graphics and gifs specially tailored to react to topics of discussion and target our audiences during a time of high social media usage.

Throughout the campaign each account showed continued traction and reach due to the constant maintenance and efforts of the CA team.

## *Email Test*

Cambridge Analytica uses psychographic profiling (i.e. personality scores) to specifically tailor advertising to a person or group of persons. Tailoring advertising to an individual's specific personality should drive behavior to a greater extent than generic messages. Using CA's national database of donors, we were able to match MAN1 signups to their corresponding personality, and tailor messaging directly to them to test open rates, conversion of donors, and call-to-action.

This approach is based on decades of research in personality psychology with a special emphasis on the so-called "OCEAN Big 5."

In brief, the OCEAN Big 5 model suggests that human personality is made up of five major domains (the first letters of which spell out the acronym OCEAN):

**Openness:** a measure of the degree to which people enjoy new experiences

**Conscientiousness:** degree to which people prefer plans and order

**Extraversion:** degree to which people enjoy being with others

**Agreeableness:** degree to which people put others needs before themselves

**Neuroticism:** a measure of a person's emotional stability (or lack of stability) and propensity to worry.

Each person has a personality that is a hybrid of each of these domains. Knowing a person's personality score provides insights into the kinds of messaging to which he or she might be especially receptive.

With this in mind, Cambridge Analytica ran two email campaigns with different types of personality based email subject lines. In both cases, subject lines were developed specifically for individuals with high scores on the neuroticism domain.

In the first email message, a subject line was developed which was designed to appeal to people with high neuroticism scores. Specifically, the email subject line was designed to be reassuring to people who ordinarily might have a propensity to worry. The subject line read:

Preserve Freedom and Overcome Hillary's Candidacy

This subject line was sent to some people with high neuroticism scores and some people without such scores.

As expected, the email with the tailored subject lined produced 20% better open rates when sent to people with high neuroticism scores than than when it was sent to people without high neuroticism scores.

In the email campaign, three types of email subject lines were sent to people with high neuroticism scores. Some suggest of the subject lines were designed to be reassuring (e.g. "**Calm the storm, stop Hillary**"), some were designed leverage a fear appeal (e.g. "**Electing Hillary destroys our nation**"), and some were generic (e.g. Information from Make America Number 1).

Overall, the fear based email subject line produced the best results. The fear based subject line resulted in 10% more email opens than a generic message, and a nearly 20% larger open rate than the reassuring subject line.

These email campaigns demonstrate the effectiveness of psychographic profiling for enhancing email marketing campaigns.

## *Television*

Four major television buys were placed over the course the DCH.

1. Cut, 10/9
2. Can't Run Her House (Michelle Obama Ad), 10/24-11/1
3. Race of a Lifetime (Drugs Ad), 10/24-11/1
4. Questions, 11/2-11/8

'Cut' ran for one night, during the second Presidential debate, in Ohio and Pennsylvania. The goal was to reach a maximum number of Principal Audience households, within our budget. 'Cut' bracketed the debate running either directly before, or directly after, depending on the exact station. The ad delivered 1.5M impressions in its' one night.

'Can't Run Her House' ran for two weeks in Florida. The buy was placed following an Ad Recall and Impact Survey conducted by CA. The survey indicated the ad moved women away from Clinton,

swinging Clinton's unfavorables by nearly 16 points among some demographics. Using this data, CA isolated persuadable women in FL based on the Principal Audience, then selected the networks - cable or broadcast - and carrier (Comcast, Charter, etc.) to best serve 'Can't Run Her House' to these audiences. The Communications team at both MAN1 and CA worked together to place multiple stories about the buy and the metrics behind it. MAN1 even drew a Cease and Desist from the Clinton campaign, a true sign of the effectiveness of this ad.

'Race of a Lifetime' ran for two weeks in Florida. The buy was placed in the Panhandle, in high density conservative areas. Similar to the above, CA used the Principal Audience to isolate regions where high Republican turnout is imperative to the outcome statewide. 'Race of a Lifetime' and 'Can't Run Her House' ran during the first week of Early Vote. Panhandle was delivered to nearly 1.6 million voters.

## *Expenditure*

MAN1 paid CA a total of \$5,593,648. Of this, \$3,868,714 - roughly 70 percent - went to delivering messaging directly to voters with the remainder going to overhead. Overhead included the retainer, the Evangelicals data acquisition, and the polling conducted by CA.

Retainer and data: \$1,377,934  
Digital Ad Delivery: \$2,534,657  
Television Ad Delivery: \$1,211,072  
Web Development: \$12,985  
List Building: \$110,000  
Polling: \$347,000

## *Conclusion*

MAN1 set out to run a highly targeted, data driven, financially transparent Super PAC. This ambition alone, set it apart from other groups, both past and present. The ability of the organization to move quickly in drafting creative, placing ads, and measuring impact made MAN1 an elite and imperative component to Donald Trump's success and Hillary Clinton's ultimate demise. The entire MAN1 team should take confidence in the knowledge that we did work other groups and individuals were unwilling to do in defeating Hillary Clinton.

Looking forward to the 2018 and 2020 elections, MAN1 still serves a purpose by collecting, and refining data for use advancing policy and directly advocating for or against candidates.

In the event MAN1 remained operational, our recommendations are to heavily invest in Hispanic data collection through survey research, third party data scraping, and digital targeting. The Hispanic portion of the electorate is only growing, and for Trump, or any other Republicans, to be successful in the future, understanding the messaging and targeting of Hispanic voters is paramount. We additionally suggest investing in voter registration efforts in states like Michigan, Nevada, Colorado, Arizona, New Mexico, and Texas. While some of these states voted for Trump, the margin of victory for conservative candidates is shrinking as years go by (Texas and Arizona) while other states have seen a demographic shift that is moving them out of the 'swing' state column to a safely blue state, making national success more challenging for candidates down the road.

Additionally, using what we learned about targeting, the principal audience, and messaging MAN1 is well positioned to lean into Trump policies, and the policies of a majority Republican Congress and Senate. Advancing these policies, through direct messaging to voters lays the groundwork for a

Trump reelection, and down ballot success for years to come. We recommend continuing with the above methodology of drafting creative, delivering it to a principal audience, and measuring its impact specifically centered around the policy initiatives of President Elect Trump.



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# EXHIBIT J



# Partido Revolucionario Institucional (PRI) The Path to Campaign Victory



December 2017



CA Political is part of Cambridge Analytica, the global leader in data-driven products and services across the commercial, political and not for profit sectors.

# Introduction





## CA Political | About

We are a multidisciplinary behavioural research and intervention agency applying a scientific approach to communications campaigns.

We understand people and why they think, feel and behave the way they do – as individuals and collectively.

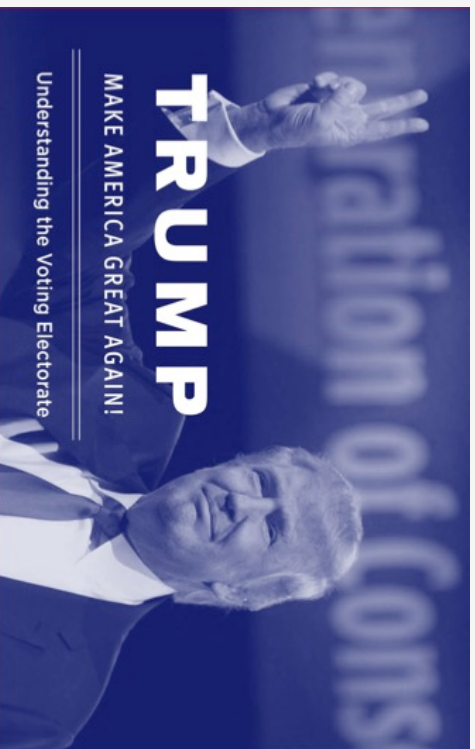
We help political parties to reach, engage and persuade their populations – to win elections, drive social change, gain support for political and economic reform.

We use in-house data modelling and analysis to create precisely targeted, tailored campaigns for different audiences across a range of political and commercial campaigns.





## Donald J. Trump Campaign | 2016



- Research
- Fundraising
- Data analytics
- Digital marketing
- Campaign spend

Find out what the electorate really thinks  
Raise money for the campaign war chest  
Identify and target 'floating voters'  
Reach out, target and persuade  
Squeeze maximum value from every dollar



British data scientists target 20 million new voters for Trump



Cambridge Analytica, The Data Gurus Who Anticipated the Election Result



Political Revolution: How big data won the US presidency for Donald Trump



Donald Trump defies all odds to become US President



## The Fight Ahead

PRI in a fight for its life.

- The party widely detested and distrusted – lowest ever ratings for President Nieto
- People dissatisfied and angry – key issues corruption and insecurity/violence
- Andrés Manuel López Obrador the populist front-runner – setting the agenda
- Ricardo Anaya energising the PAN/PRD/MC coalition – youthful agent of change
- Candidate Meade an unknown quantity – less than 10% national name recognition
  - Depicted by opponents as “more of the same,” elitist, out of touch with ordinary Mexicans, a regression to the past

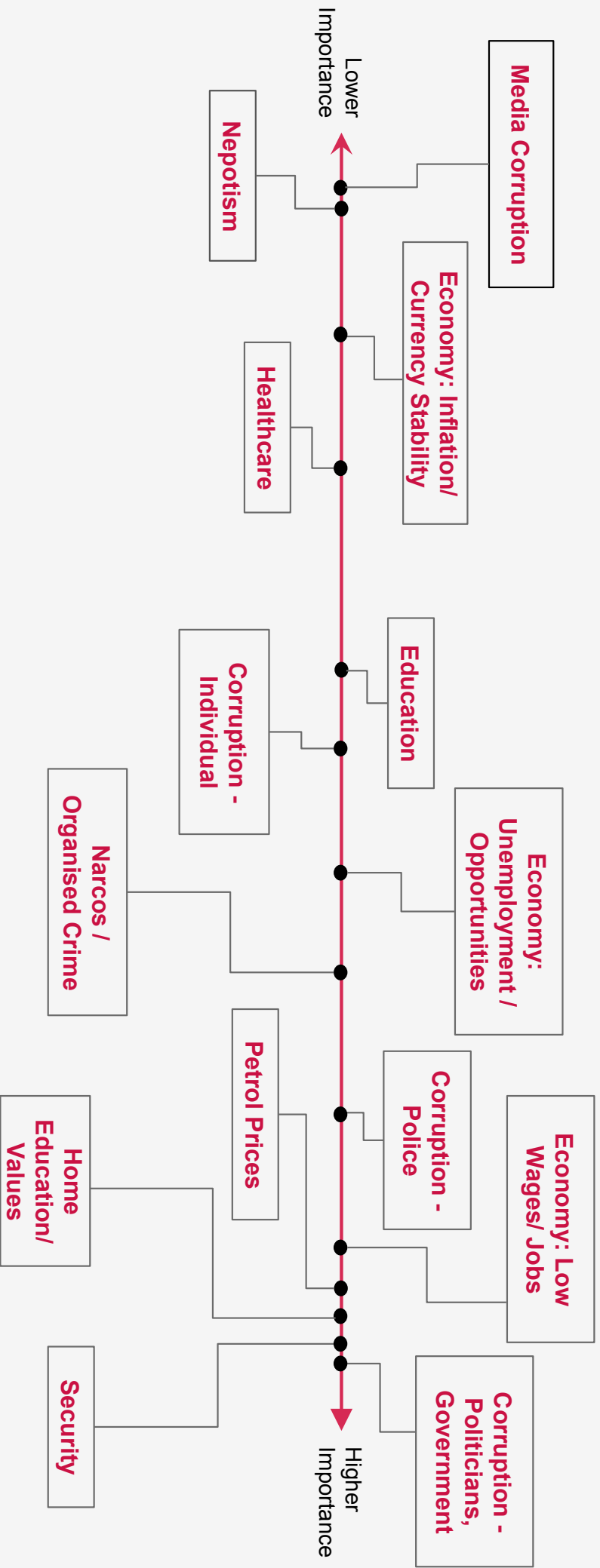
**BUT:** a great opportunity to define the man, build the brand, create a new image

# Insights

June 2017



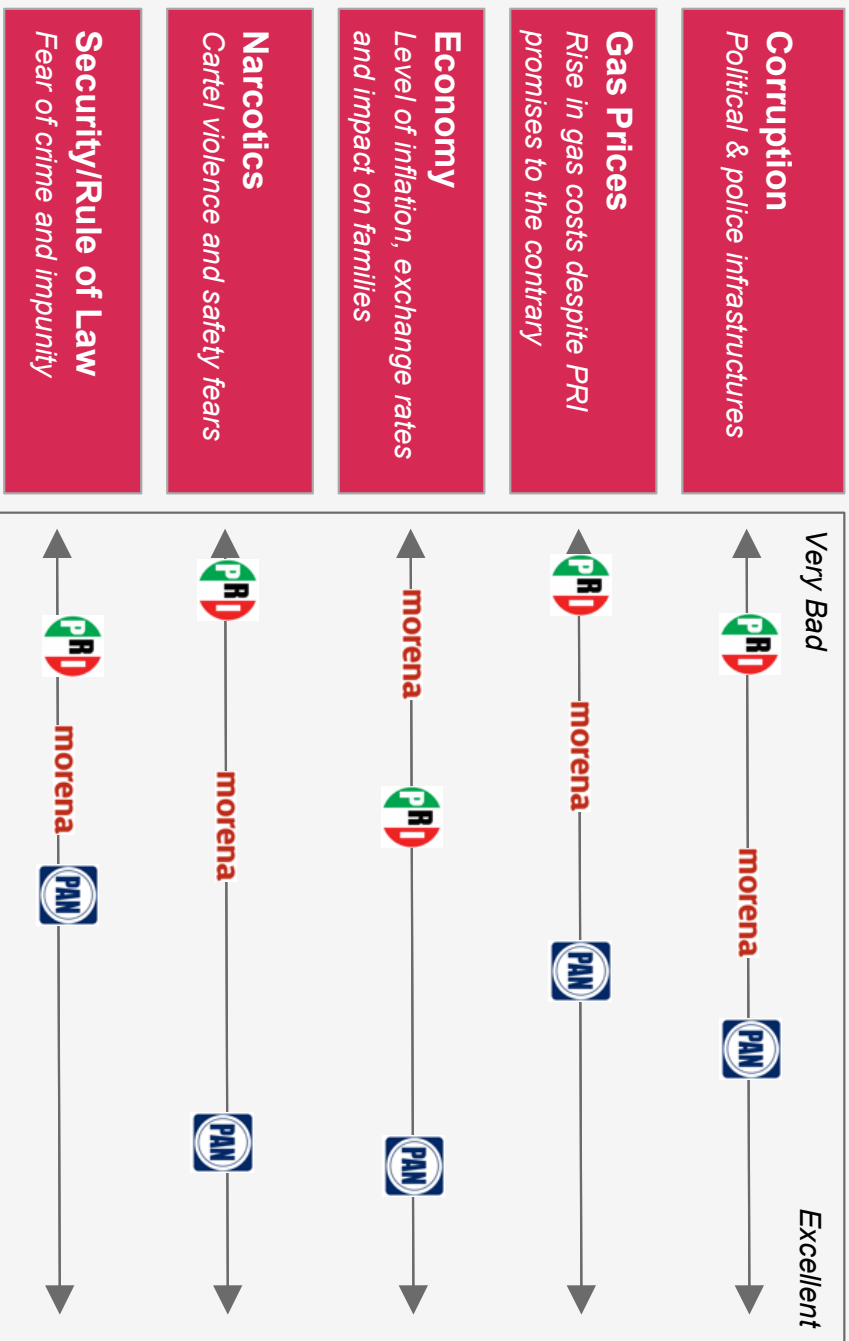
# Issues People Care About





# Party Performance: Key Issues

PRI seen as performing badly (and worst of all parties) in addressing key issues



Most important

PRI is seen as by far the most corrupt of the major political parties. Both the Casa Blanca scandal and Javier Duarte are common references. PAN and Morena are viewed far more favorably.

PRI is seen as the driving factor behind the rise in fuel prices. Behind corruption, this matter is the single most corrosive for PRI.

PAN is viewed as a business minded party. Their time in the presidency is viewed as a time of a stable Peso and strong economy.

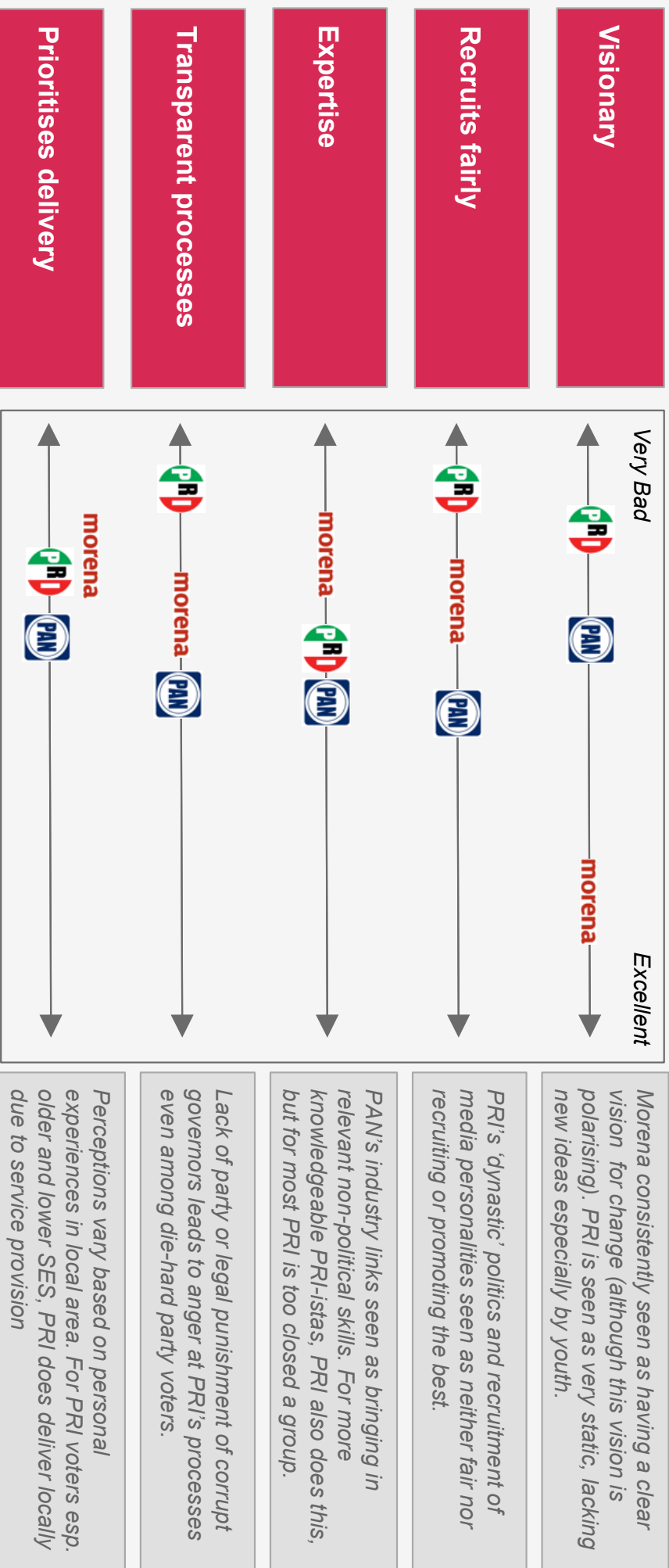
PRI's brand is tied to narcotics and narcotic traffickers. PRI is viewed as either an active collaborator or passive bystander. PAN is strong on this issue.

PAN is viewed as stronger on security than PRI. Lawlessness and bribery are seen as distinctly in line with the PRI brand.



## Party Performance: Ideal Attributes

PRI seen as performing badly (and worst of all parties) across most key party attributes



Most important



# Overall: PRI has largely negative associations

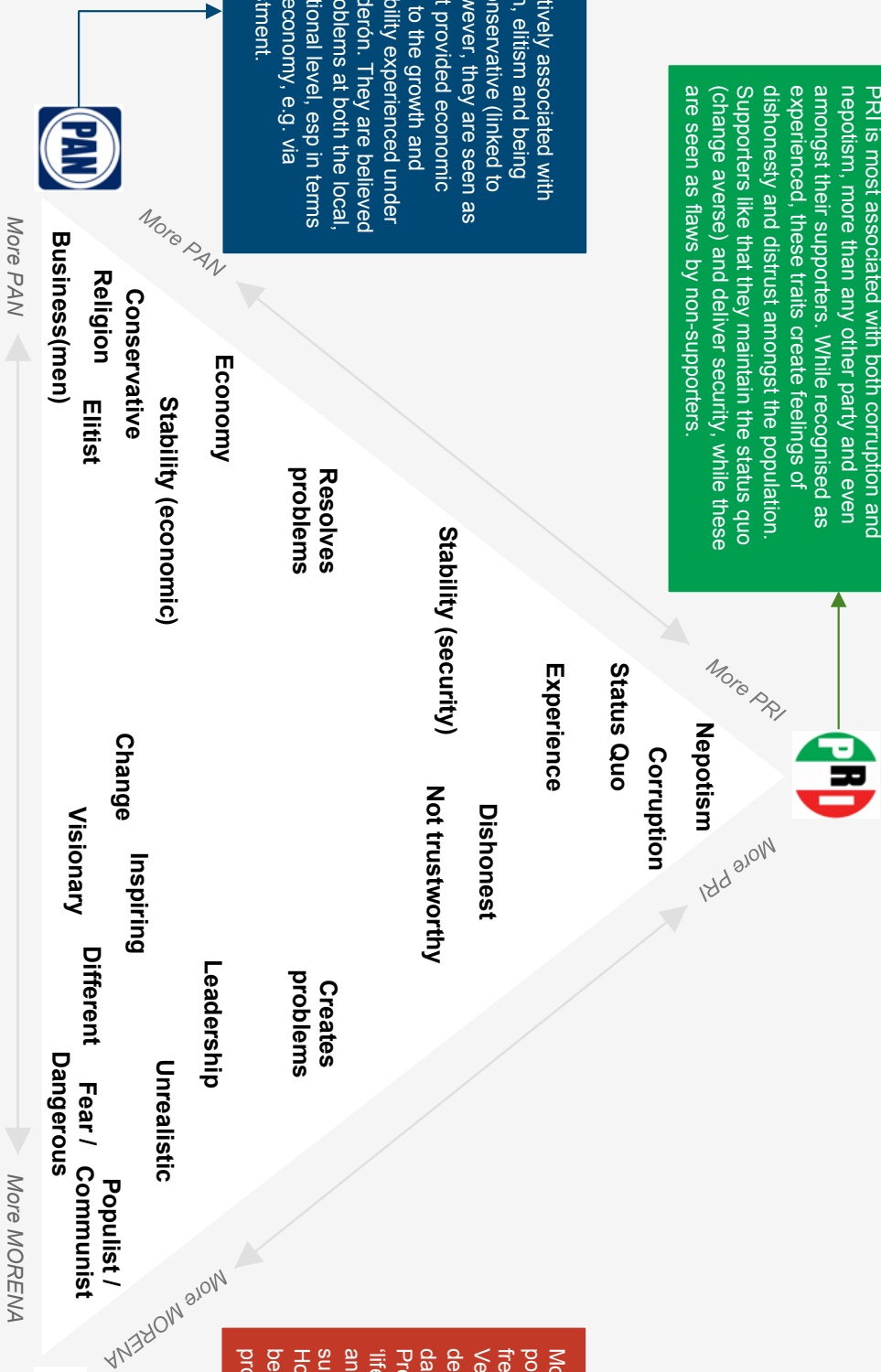
PRI is most associated with both corruption and nepotism, more than any other party and even amongst their supporters. While recognised as experienced, these traits create feelings of dishonesty and distrust amongst the population. Supporters like that they maintain the status quo (change averse) and deliver security, while these are seen as flaws by non-supporters.



PAN is negatively associated with businessmen, elitism and being extremely conservative (linked to religion). However, they are seen as the party that provided economic stability, due to the growth and currency stability experienced under Fox and Calderón. They are believed to resolve problems at both the local, state and national level, esp in terms of work and economy, e.g. via foreign investment.



Morena is highly associated with populism and communism, with frequent references to Cuba and Venezuela. This creates a high degree of fear and sense of danger the party could bring. Proposals (and even Obrador's 'lifestyle') are seen as unrealistic and not feasible to deliver without support from other parties. However, the party is praised for being different, visionary and promoting much needed change.





## The Path to Victory

1. **Emphasize Meade's credentials as a skilled and experienced technocrat** – not a politician but a man who “gets things done.”
2. **Take a stand against PRI corruption scandals** – acknowledge past mistakes and offer real, practical solutions in the fight against corruption.
3. **Define what prosperity really means for the average citizen** – not vague promises about “economic prosperity” but what that means in concrete terms for the average Mexican: the Peso in your pocket, your grocery bill, your children’s education.
4. **Go hard against violence and insecurity** – again, not lofty speeches about human rights or transforming the police, but effective proposals that demonstrate Meade’s ‘iron fist.’
5. **Reach out to a wider constituency** – bring non-partisan talents (from academia, civil society, business) into the administration, and make particular efforts to reach out beyond traditional PRI strongholds to the young, women, the working poor.

## The Winning Factor

**Data-driven campaigning – not gut instinct or guesswork – is key to election success**

- **Requires a data infrastructure with detailed information on the entire voting population:**
  - Behavioural drivers – underlying narratives, motivations, values, identities
  - Platform to model, segment and micro-target the population
  - Ability to identify and engage ‘floating voters’ on social media and mobile internet
  - Landing the right message, at the right time, in the right format, for maximum impact
- **Minimum 5% uplift in voter persuasion and turnout – the winning margin**
- **‘Future proofing’ the party – building the strategic hub of PRI’s electoral campaign machine in 2018 and for years to come**

# Roadmap to Victory | 2018



## **PRI's 'Secret Weapon'**

Stealth unit operating at arm's length and out of the public eye.

Feeding into the campaign War Room through a parallel operation – 'turbo-charging' PRI's communications efforts and impact.

Tasked to:

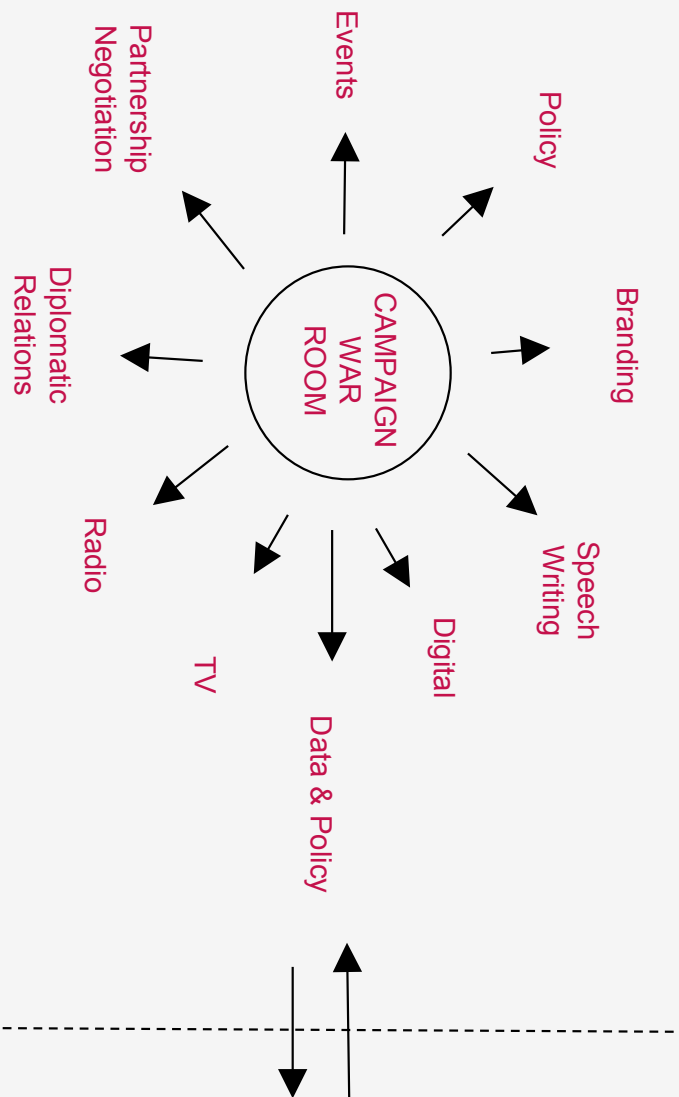
1. Conduct in-depth behavioural research
2. Build a data infrastructure to model, segment and micro-targeting the entire voter base
3. Advise on communications strategy, targeting and messaging
4. Implement two supportive campaigns (one pro-candidate and the other anti-opposition)

Support for the 9 key gubernatorial campaigns – coordinating research, data analytics and communications planning across all War Rooms.



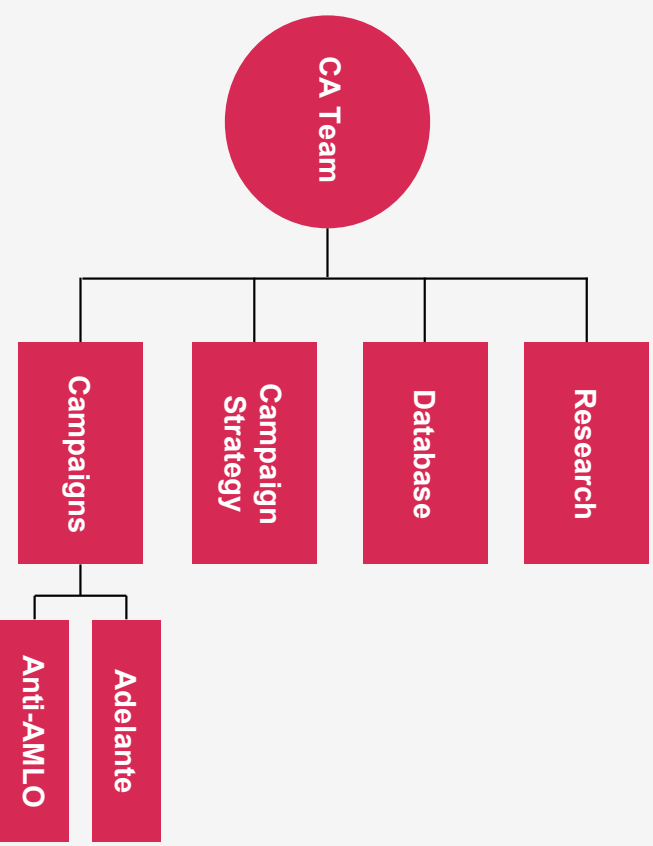
# Coordination Structure

## National Campaign



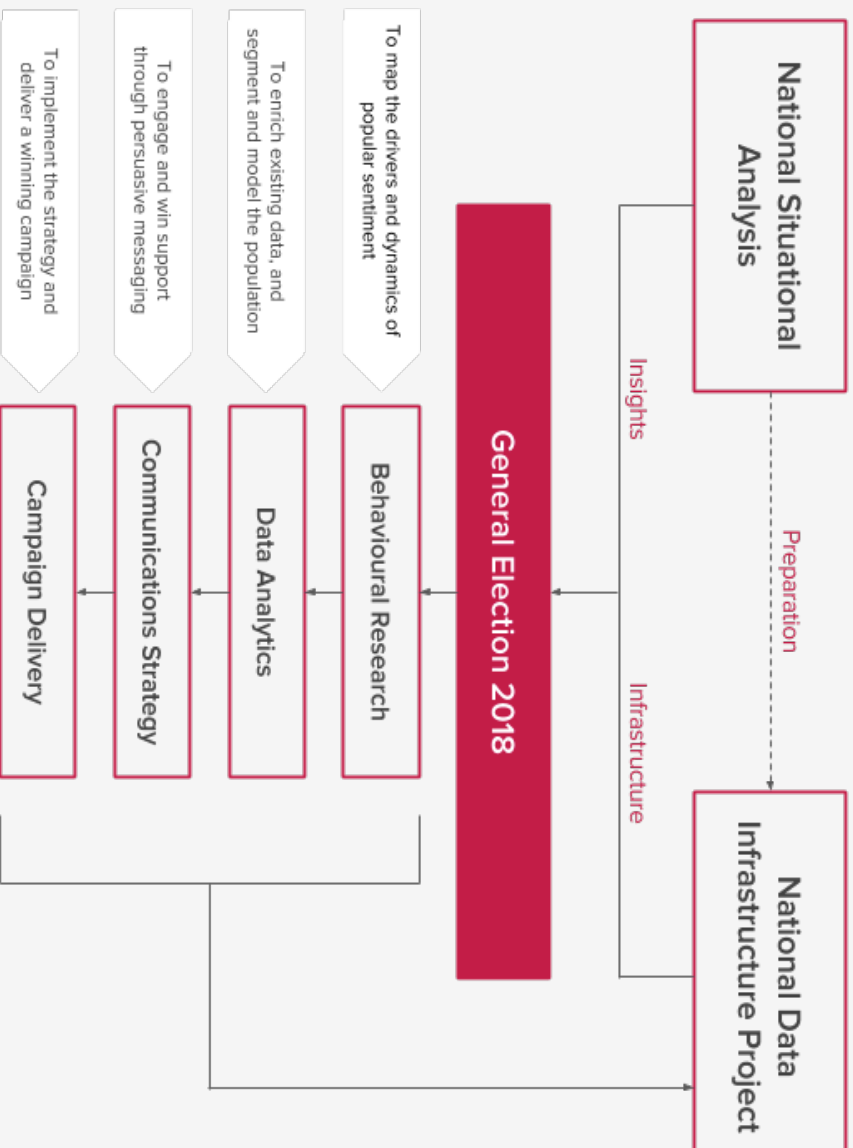
Firewall

## CA: Stealth Unit





# General Election 2018 - National Campaign



# Data Infrastructure



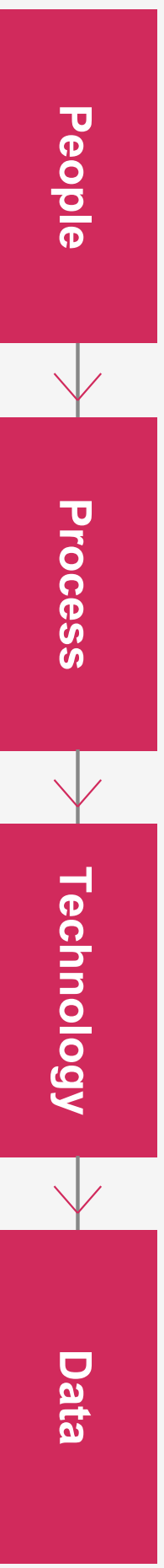


## National Data Infrastructure Project

**Objective: build a database with detailed information on the entire voter base**

- A platform to model, segment and micro-target the population
- Able to identify and engage target audiences with the right message, at the right time, in the right format
- Strategic hub of PRI's electoral campaign machine in 2018 and for years to come

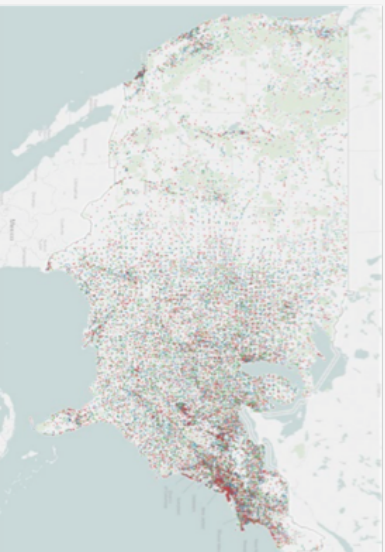
Our proven Data Infrastructure methodology covers the following four lenses through which a successful implementation is created and run:







# Targeting US-Based Mexican Voters



**Target and recruit US-based Mexican voters**

In 2006 PRI got 4% of the foreign vote;

In 2012 they got 17%; we now need to target minimum 25%.

Many do not apply for cards on time or go collect them once ordered.

Over 11 million eligible Mexican voters in the US.

**Only 56,000 of them voted in the last election.**

Because of strong and influential links between the two countries, **40,000 votes in the US will influence an estimated 8m votes in Mexico**

The screenshot shows a web interface for data visualization. At the top, there is a navigation bar with 'connect' and 'DATA VISUALIZATION > GEO REPORT'. Below this, there are two main sections: 'District information' and a map. The 'District information' section displays the following data: District: 2, Primary voters: 128237, Selected voters: 2802, Delegate selection: Caucus/Convention, Eligibility: closed caucus, and Number of delegates: 3. To the right of this information is a grey map outline of the United States. Below the information is a map of a specific geographic area with numerous purple location pins. The map is titled 'MAP DATA ©2015 GOOGLE' and includes a legend for '2013 US HOUSE' and '2013 US SENATE'.

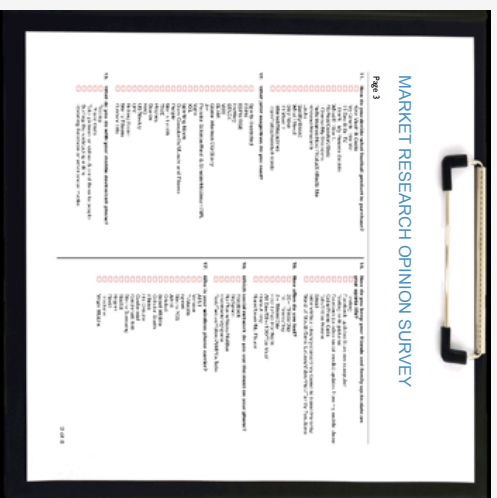
# Behavioural Research

# Political and Behavioural Research

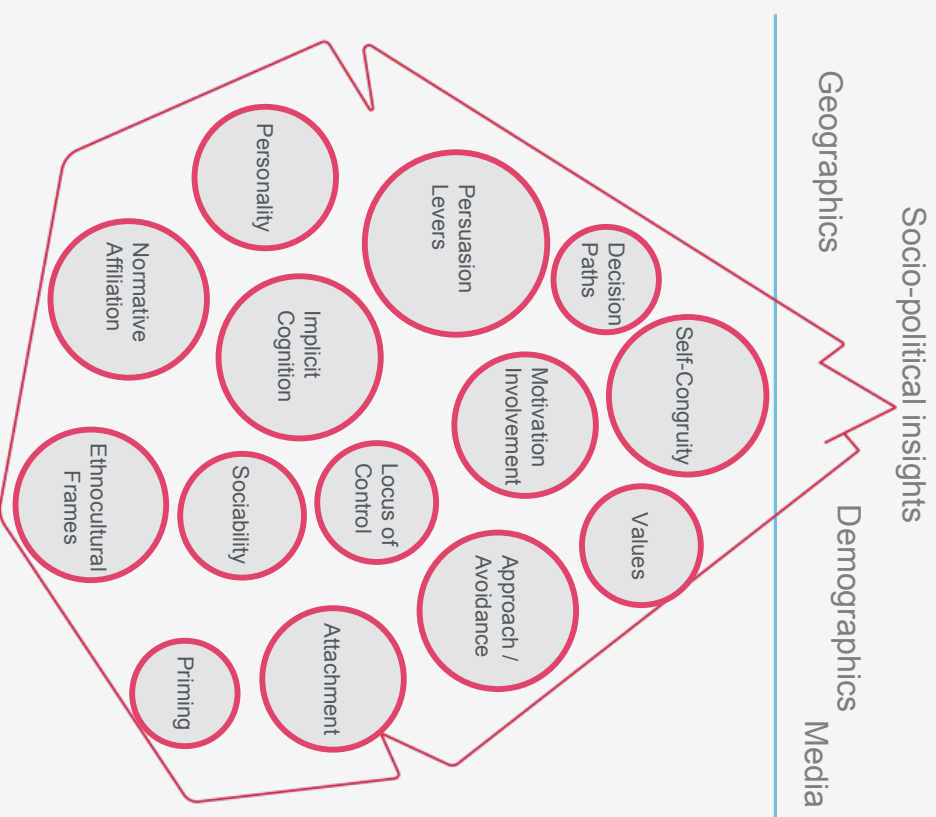


## Target Audience Analysis

- Not a typical opinion poll
- Designed to reveal underlying narratives, motivational drivers, values, identities
- Segment population into groups based on shared characteristics/drivers



Vs



## Target Audience Analysis

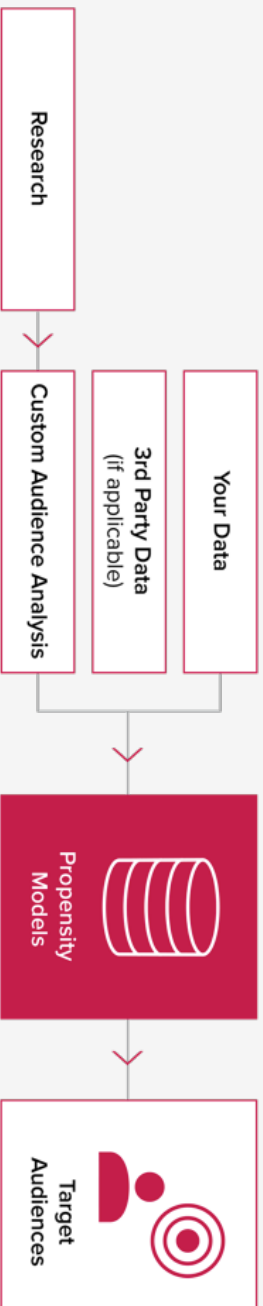


- Strategic partnership with Gabinete De Comunicacion Estrategica
- 25,000 door to door interviews
  - 10,000 telephone interviews
  - Building on in-depth focus groups
  - Creating a detailed map of the electorate – by issue and location
  - Tracking salience of key issues, support for parties/ politicians, what it will take to change mindsets
  - Design electoral strategy using insights from the research

# Analytics & Delivery



# Data Analytics



## Enrichment

CA Data Scientists and Engineers build a new, integrated and enriched database.

## Analysis

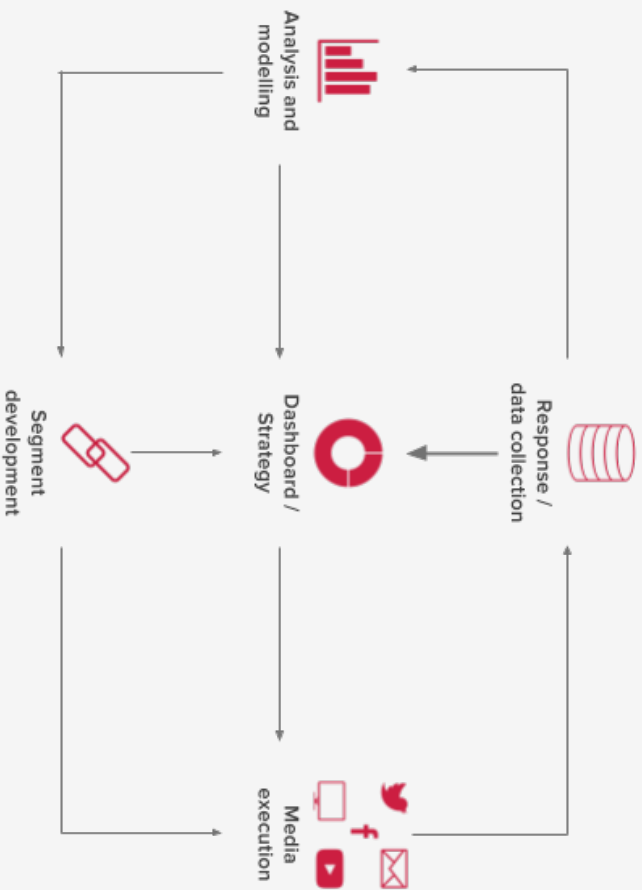
CA's data scientists will transform data into insight by analysing and visualising the cleaned and enriched data to identify patterns and build an understanding of influencing factors.

## Modelling & Segmentation

Armed with a detailed understanding of the challenges and a rich pool of data, CA's data scientists will create a set of propensity models that segment the population into actionable groups based on traits found to be significant from our research.



## Campaign Cycle



CA will provide end-to-end campaign support by:

1. Constantly feeding the campaign machine with new research and polling data
2. Analysing this data against our predictive models to extract behavioural insights
3. Segmenting the population into different actionable groups with similar characteristics, attitudes and voting preferences
4. Microtargeting each group with highly persuasive digital messaging on multiple platforms to maximise impact and spend efficiency.

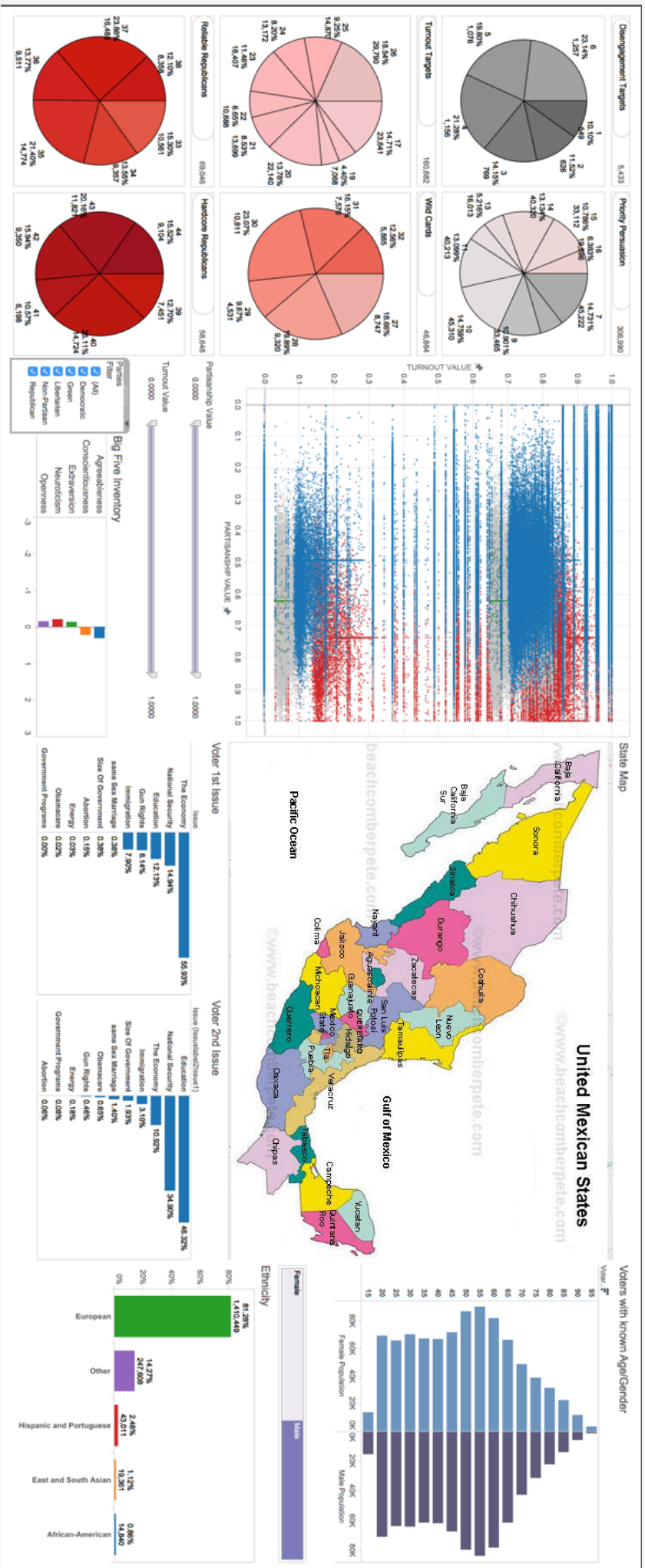


## Sample Media Plan – Indicative

Objective	Platform	Ad Type	Geography	Audience	Budget	Impressions	Frequency	Reach
Infrastructure	Facebook	Like Ad	Key Geographies	Persuadable Voters	\$40,000	1,600,000	3	5,333,333
Infrastructure	Twitter	Follow Ad	Key Geographies	Persuadable Voters	\$20,000	800,000	3	266,667
Persuasion	Display Network	Display	Key Geographies	Persuadable Voters	\$90,000	15,000,000	9	1,666,667
Persuasion	Facebook	Social Video	Key Geographies	Persuadable Voters	\$200,000	8,000,000	6	1,333,333
Persuasion	Twitter	Social Video	Key Geographies	Persuadable Voters	\$80,000	3,200,000	5	640,000
Persuasion	Video Network	PreRoll Video	Key Geographies	Persuadable Voters	\$200,000	8,000,000	8	1,000,000
Persuasion	Snapchat	Video	Key Geographies	Persuadable Voters	\$50,000	2,000,000	5	400,000
Persuasion	Snapchat	Geofilter	Key Geographies	Persuadable Voters	\$30,000	2,000,000	4	500,000
Persuasion	Google Search	Text	Key Geographies	Persuadable Voters	\$30,000	5,000,000	4	1,250,000
Mobilization	Video Network	PreRoll Video	Key Geographies	Supporters	\$90,000	3,600,000	7	514,286
Mobilization	Facebook	Social Video	Key Geographies	Supporters	\$100,000	4,000,000	5	800,000
Mobilization	Display Network	Display	Key Geographies	Supporters	\$50,000	8,333,333	9	925,926
Mobilization	Snapchat	Geofilter	Key Geographies	Supporters	\$20,000	1,333,333	4	333,333
<b>Total</b>					<b>\$1,000,000</b>	<b>62,866,666</b>		



# Campaign Dashboard



# Adelante Campaign



## Adelante Campaign

The public  
distrust government



but people are  
proud to be Mexican





## Adelante Campaign

CA will devise and roll out a national 'feel good' campaign - provisionally titled **ADELANTE MEXICO** - that will:

1. **Highlight government achievements**
2. **Reconnect PRI with the population**
3. **Reinvigorate national pride.**

Giving ordinary people a voice and platform for them to talk about the key issues at the heart of Mexicans' daily life. Shifting the dialogue between the government and its citizens from the current top-down bureaucratic messaging, to bottom-up engagement through individuals and local communities.



### **Adelante Campaign for the people**

Government success stories  
told by the people.

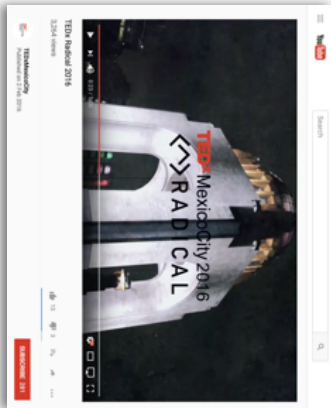
**ADELANTE MEXICO** is a campaign for the people, *told by the people*, to:

- a) Illustrate the Government's success stories communicated through video stories, personal testimonies, VIP endorsements, and community champions.
- b) Promote and stimulate national pride in being Mexican, and proud of Mexico.





# Outdoor / Radio / Press / Online / TV / Grassroots



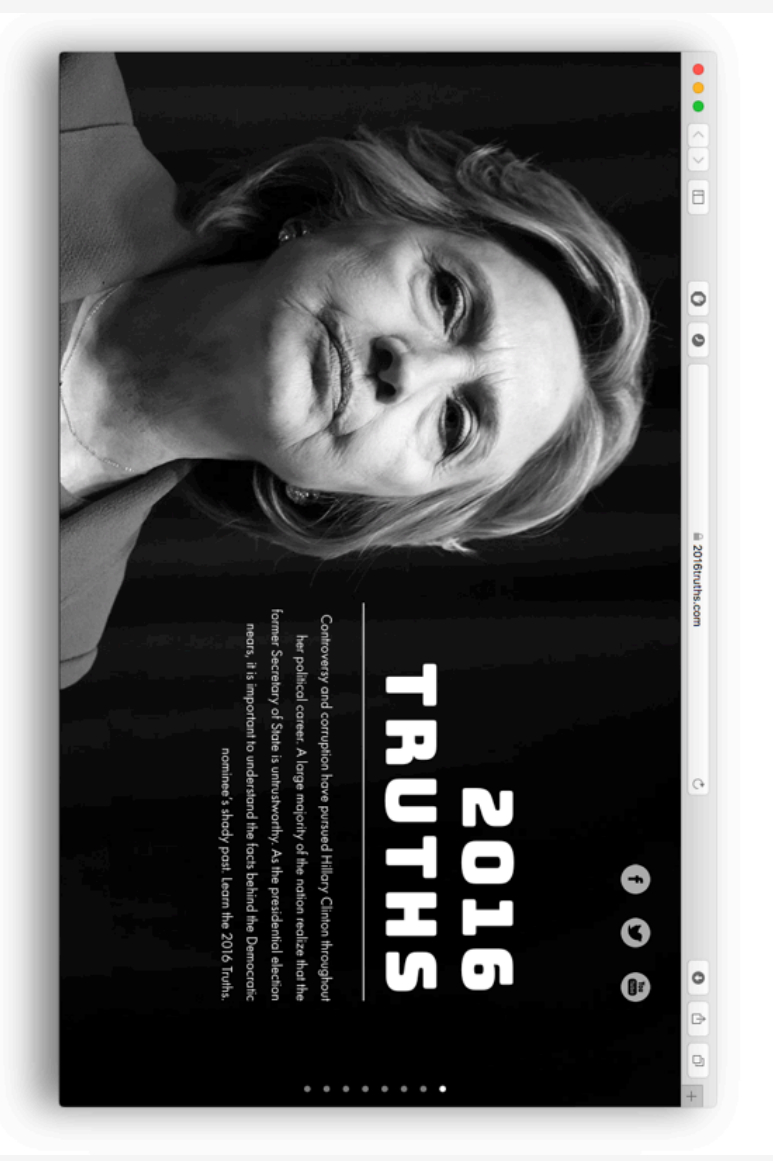


# Anti-López Obrador Campaign



## Anti-López Obrador Campaign

### FIRST SOME CONTEXT: BRINGING DOWN THE RICHEST CANDIDATE IN HISTORY





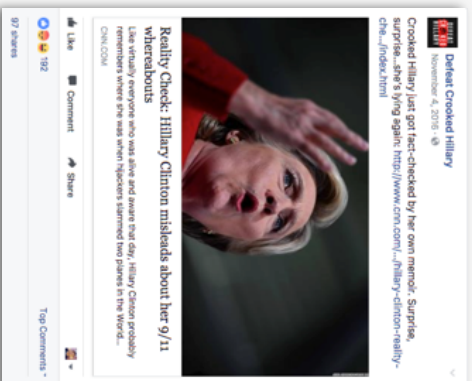
Research Led - started by issue mapping the population

Strategically Placed – campaigns timed and targeted to perfection

Innovative Technology - using latest digital advertising technology

- 211 million total impressions
- 1.4 million link clicks
- \$2.5 million total digital ad spend
- Search & Twitter CTR neared 3% overall
- Digital videos received 25 million views





- Targeted Posts and Ads:
- Facebook: 50 million impressions
- Display: 25 million impressions
- Search: 8 million impressions
- YouTube: 3 million views
- Snapchat: 3.6 million impressions
- Twitter: 1 million impressions

**Increased “Intent to vote for Trump”  
in Florida by 8%, among viewers**





## Anti-López Obrador Campaign

CA will undertake a national campaign to address the growing popularity of Morena leader, AMLO.

1. Derived from in-depth focus groups and online research
2. Identify AMLO's weaknesses
3. Implement a powerful negative campaign strategy to undermine the populist leader between now and polling day.

Using similar techniques that were employed against Hillary Clinton in the 2016 US Presidential election, we will use the research findings to **deploy targeted communications across a variety of platforms in order to maximise exposure and impact.**



# NEGATIVE 1: AMLO's manipulation

His ideas, his charisma and his overall persona draw in the less educated.

Meaning & Importance

Examples

## Manipulation

Multiple respondents (especially the higher SES groups) view ALMO's promises as designed to systematically manipulate those with lower education and lower wealth. People commonly believe that AMLO plays on their deepest fears (and hopes) without any real concern for being able to deliver for them.

AMLO's policy proposals are viewed as wildly unrealistic, simply unworkable in Mexican society, but ideas certain to garner support amongst the lowest classes. The fact that he does not moderate his proposals leads people to believe that his manipulation is intentional. Morena is also accused by some of vote buying.

## False Promises, Dishonesty

Ultimately, while AMLO does recognise the issues facing the country, his promises to tackle them are viewed as false and dishonest by many - they are not achievable and 'selling' them to the masses as possible is viewed as highly dishonest and unethical. Lying in this way is viewed by some as its own version of corruption.

The "unrealistic" promises to end corruption and poverty are seen as great, but totally unrealistic given his overall lack of power and limited connections (e.g. enemies after leaving PRI and PRD). Scholarships, for example, are a welcome idea - but people have no understanding of where/how he would get funds.

## Ignorance of lower class

AMLO's base of support is often viewed as somewhat "ignorant" or less educated. They understand these profiles are suffering and often overlooked by politicians, however, they also believe that AMLO is using this to his advantage and taking advantage of their plight.

His use of grand promises to tackle their day-to-day issues are often mentioned - believed to be unachievable by many. There is also comment of his use of the 'Morena' as the party name, drawing upon religion and the Virgin Mother (La Virgin Morena) to win votes.

## NEGATIVE 2: Dangerous rhetoric

AMLO is often likened to a dictator, e.g. those of Cuba, Venezuela and (in a different way) Trump

*Meaning & Importance*

*Examples*

Dictator

AMLO is constantly referred to as a potential dictator in the vein of Chávez, Maduro, and even Trump. There are real fears that if AMLO were elected he would lead Mexico down a similar road as Chávez and Maduro in Venezuela. The strength of ALMO's left-wing rhetoric and some of his ideas mean people see parallels to the current conflict in Venezuela - and fear this outcome.

People see similar language used and similar policy proposals (nationalisation of gas, land redistribution, tax rises for the rich etc.) directed towards the same population segments.

His calling up/bussing in supporters to protest his failed election bid in 2006 is also seen as similar to the tactics of Chávez and Maduro.

Populism,  
Communism

Many of AMLO's policy ideas are seen as extreme, taking left-wing rhetoric too far and to a dangerous place for the country as a whole. While the policies feel unrealistic to most, there is recognition they may resonate with the lower classes, which would impact the middle and higher SESs in very real ways.

The most cited fear is from middle and higher SES voters (across all three states), who fear that AMLO would take their land or other assets in order to redistribute it. While they want to see the lower classes supported more, this should not come at their expense.

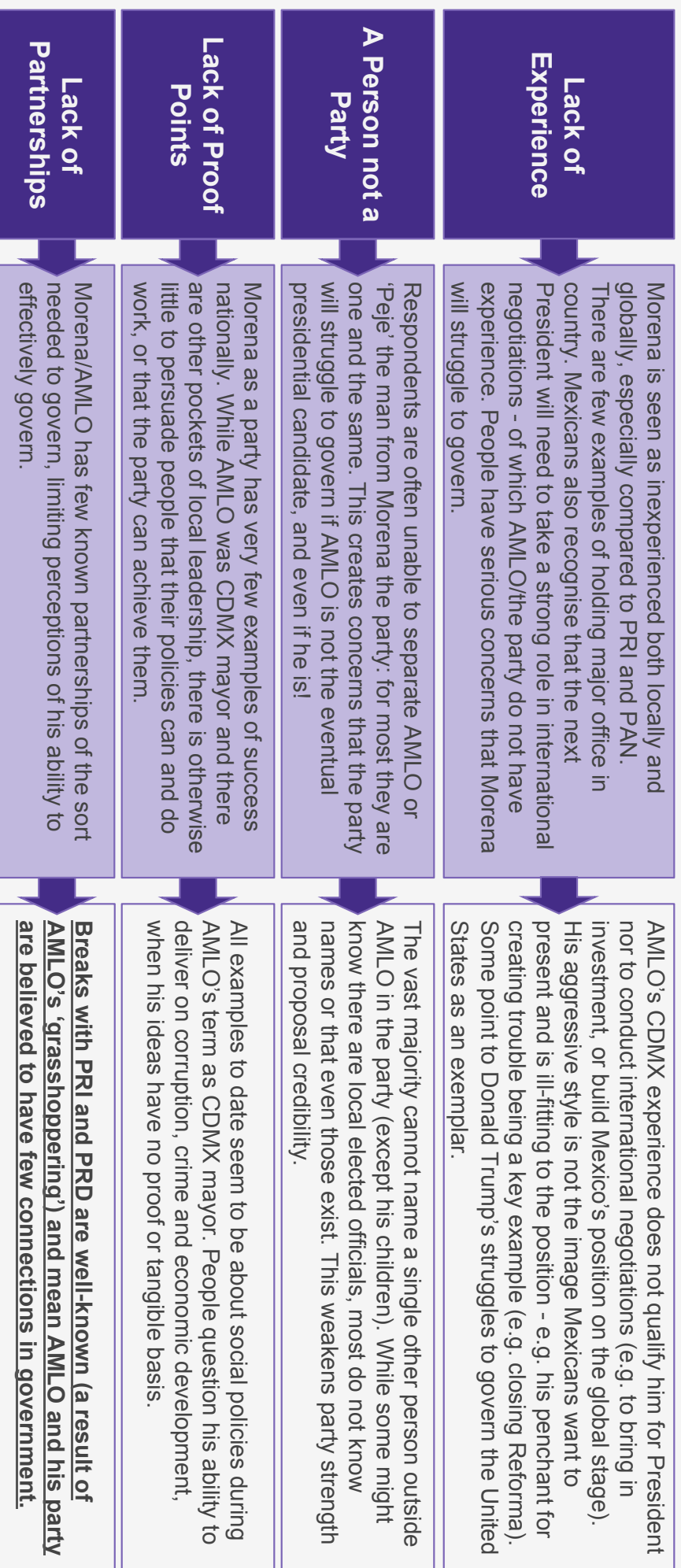


## NEGATIVE 3: AMLO's lack of governing experience

The party is new, and AMLO has never held high office of this kind

*Meaning & Importance*

*Examples*







## NEGATIVE 4: AMLO as a liar / untrustworthy

AMLO's rhetoric of his 'simple' lifestyle does not fit with what people know of his activities, while his party hopping makes his loyalty and commitment questionable.

*Meaning & Importance*

Uses a platform of 'honesty' and transparency' as part of his rhetoric, but not believable in terms of what he says about how own life/lifestyle, which loses him credibility. **He himself is seen as a liar and hypocrite: felt to lie about his motives, his beliefs and his lifestyle. The majority believe him to be just as corrupt and power hungry as politicians from established parties,** maybe more!

*Examples*

**His claims to lack income and only use cash (no credit cards), feel out of sync with modern life and with his known travelling.**  
**AMLO says he doesn't own any home, but he must live somewhere and is known to have holiday homes abroad.**  
**Many speculate he has most of his assets in the names of his children, in order to appear true, but really is a lie.**

Liar

The vagueness surrounding his income, homes, campaign funding, etc. and the degree to which what he does say seems unrealistic means most see him as a liar - doing shady things to seem poor and simple, but in practice not.

His claims to lack income and multiple homes are felt to be out-right lies and undermine his promise to end corruption. Recent scandal involving cash being handed over seen as the reality starting to emerge.

'Grass-hopping'

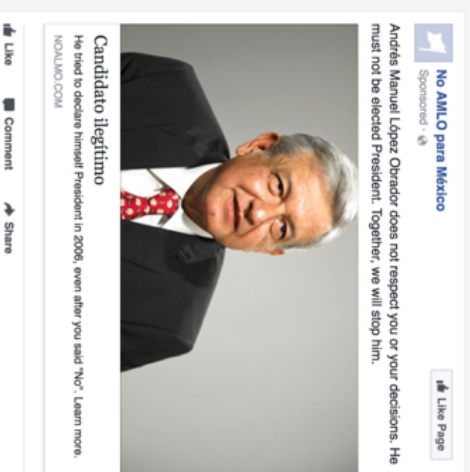
Party hopping is seen as a lack of commitment to a party and is perceived negatively by many: can't build consensus, loses patience and then moves on to start again. Again, felt to indicate his flexible beliefs and lack of loyalty to any one party/cause (implying he is only seeking power and influence).

Past member of PRI and PRD, now founded Morena. Older voters in particular are critical of AMLO's past political affiliations and his inability to bring about change from within. See this as having negative implications for his character. Young are more forgiving but still concerned by the lack of loyalty.



## Initial Concepts

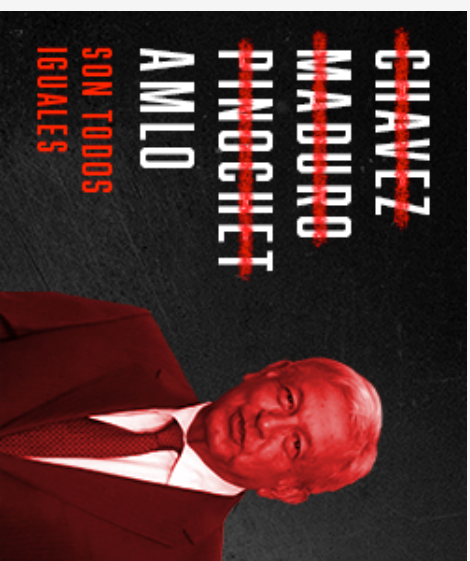
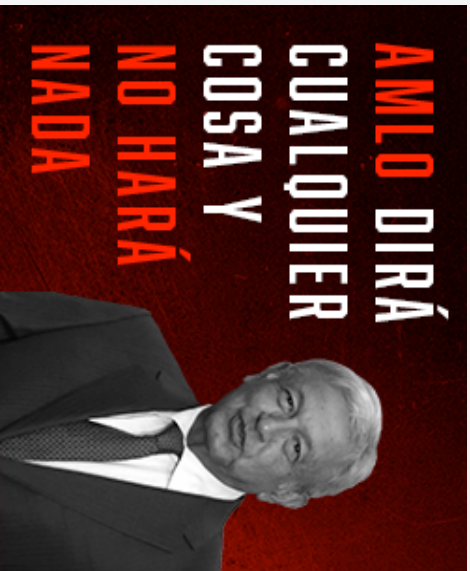
- Andrés Manuel López Obrador is a lifelong politician.
- He has run for President and lost twice. After both elections there were mass protests.
- “No AMLO para México”



- AMLO has switched parties multiple times and has no loyalty to anyone but himself.
- He does not respect the democratic process institutions and tried to declare himself President in 2006.
- “Illegitimate, unelectable candidate”



## Initial Concepts



- Unattributed concepts designed to infiltrate online conversation
- As the campaign develops, content will become increasingly varied and dynamic – using GIFs, animations, infographics, Youtube videos, mash-ups, cartoons...
- Organic content designed to go viral, spread through influencer networks, amplified through digital advertising



## Creating the 'Master Brand'



- A powerful and damaging association in the public mind between AMLO and MALO
- Will become a 'master brand' on all anti-Obrador creative treatments – equivalent to '*Defeat Crooked Hillary*'
- Image produced and disseminated Dec 13 – already going viral
- Aim to trend in 'Top 10' images online through influencer networks

# Gubernatorial Campaigns



## Additional Component: Gubernatorial Campaigns Support

A parallel programme of support for the 9 gubernatorial elections

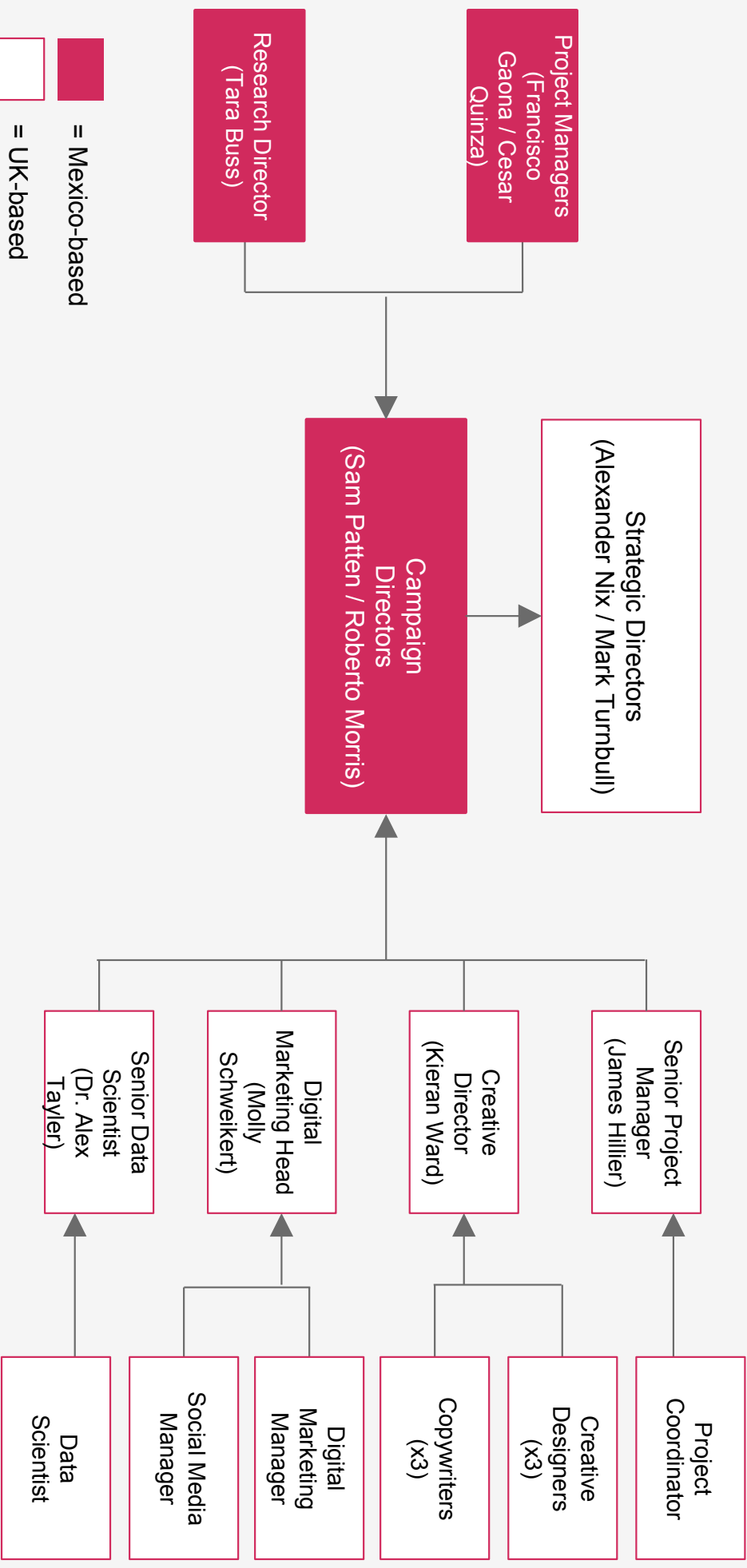
Ciudad de México	Veracruz	Jalisco
Puebla	Guanajuato	Chiapas
Tabasco	Yucatán	Morelos

- Opportunity for PRI to strengthen its support at the grassroots level and build the foundation for national success
- CA Campaign Managers deployed into each state for the duration of the campaign
- Working closely with the gubernatorial candidate and local campaign team, whilst liaising directly with the national Campaign Director to create a constant flow of intelligence and feedback
- CA Data Scientists scoping out and implementing the data capabilities at the state-level.

# Project Team & Timeline



# Project Team



■ = Mexico-based

□ = UK-based





## Team Biographies

Team	Profile
<b>Alexander Nix</b>	CEO of Cambridge Analytica, market leader in the provision of data analytics and behavioural communications for political campaigns and commercial enterprises.
<b>Mark Turnbull</b>	MD of CA Political (Global), with 30 years' experience in international political and corporate communications, PR, branding, electoral and campaigning strategy, and geopolitical conflict transformation.
<b>Sam Patten</b>	Accomplished international government affairs and communications expert, with nearly 20 years' experience advising political figures and running election campaigns in the US and abroad.
<b>Roberto Morris</b>	A leading Mexican political consultant, university lecturer and journalist with over 15 years' political campaigning experience, including three presidential elections and several acting governors.
<b>Francisco Gaona</b>	Political consultant with 8 years' communications experience, including research, advertising, digital strategy and community outreach, including four years with PRI as Manager of the Electoral Secretariat in Coahuila.
<b>César Quinzá</b>	Strategic communications / government affairs expert with experience working in Europe, Canada, and the US. Previous roles include serving at the Senate of Mexico and IBM Global Analytics, bridging the political and big data worlds.
<b>Tara Buss</b>	PhD expert researcher on Latin American politics. Previous research areas include social movements and collective action, and Mexican democratization. Current research interests include political participation and clientelism.
<b>Kieran Ward</b>	Has developed creative strategies for many successful elections around the world. Most recently providing data driven creative strategies to a winning Presidential campaign in east Africa and a number of victorious US mid term races.
<b>Molly Schweikert</b>	Led her team to handle the digital marketing infrastructure, strategy, and execution for the Trump presidential campaign, an effort recognized for its remarkable scale and innovation through multiple awards in the digital advertising industry.
<b>Dr. Alex Tayler</b>	Chief Data Scientist at CA. His primary focus is the development and implementation of models that combine theoretical psychology with big data analytics to enable highly accurate predictions of human behaviour.
<b>James Hillier</b>	A Senior Project Manager who has managed research and communications projects around the world. Recent projects have included American data and digital marketing projects, and field management of a large research project in Africa.



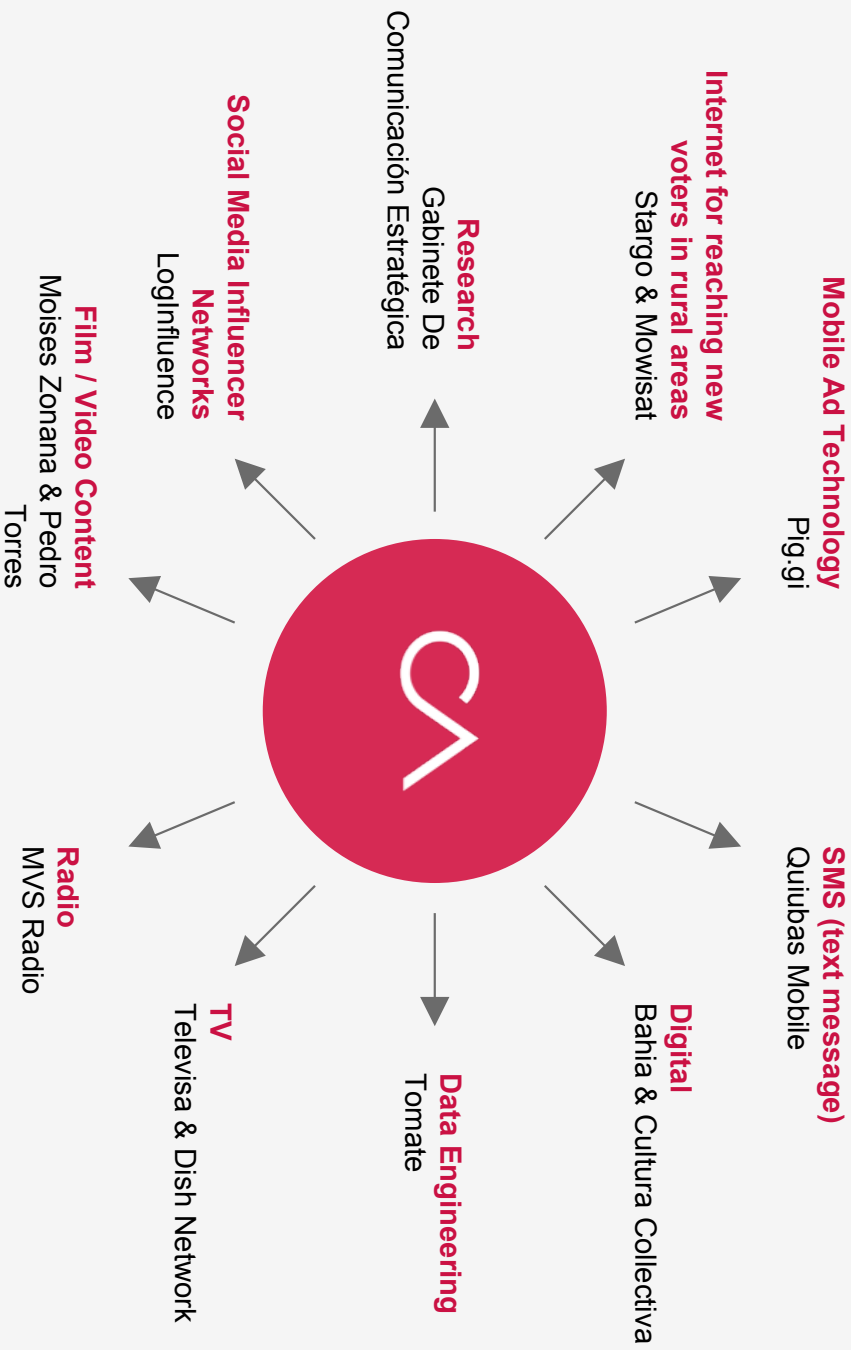
## Timeline overview

Month	Dec	Jan	Feb	Mar	Apr	May	Jun
Situational Analysis	█						
Research Design	█						
Brand Development	█						
Data Acquisition	█						
Research		█	█	█			
Digital Marketing		█	█	█			
Creative Content Production		█	█	█			
Communications & Strategy		█	█	█			
Strategic Campaign Support							
National Data Infrastructure							

█ = Indicative (to be confirmed after Situational Analysis)



# CA Mexico Activation Network





## **Next Steps**

1. Client approval for overall approach and authorisation to proceed
2. Advance payment secured
3. Team mobilisation
4. Campaign Launch Plan

# EXHIBIT K

Subject: Re: CA Video Content

From: Emily Cornell [REDACTED]

Date: Mon, 10 Oct 2016 15:11:22 +0000

To: Al Han [REDACTED]

Cc: Brittany Kaiser [REDACTED]

Matthew Hunter [REDACTED]

"Peregrine \"

Aman Mann [REDACTED]

Kelly Rzendz [REDACTED]

Livia Krisandov [REDACTED]

Duke Perrucci [REDACTED]

All,

New cluster of ads went live through the SuperPAC. Cut was on TV before/after the debate in OH and PA.

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

Article on Cut: <http://time.com/4524276/defeat-crooked-hillary-ads/>

Danger to National Security: [https://www.youtube.com/watch?v=fY\\_MbNvnTgQ](https://www.youtube.com/watch?v=fY_MbNvnTgQ)

Corruption is a Family Business: <https://www.youtube.com/watch?v=Qxvut7UJpCU>

Race of a Lifetime: <https://www.youtube.com/watch?v=kGdKr-0Ti78>

Emily Cornell

Senior Vice President, Political Affairs

[REDACTED]

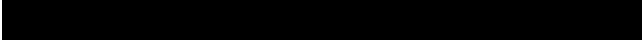
CA Cambridge Analytica

[REDACTED]

[REDACTED]



<https://cambridgeanalytica.org>

On Sep 26, 2016, at 5:01 PM, Emily Cornell  wrote:

All,

We launched a website today to bracket HRC during tonight's debate. Could be useful to highlight for clients: <https://www.2016truths.com>

Additionally, we've had a few new videos in the last week for a few different clients.

Corrupt and Dangerous (Make America Number One): <https://www.youtube.com/watch?v=fzeU9iw5Dg4>

Do Nothing (Make America Number One): <https://www.youtube.com/watch?v=UJJNdI3GsPc>

Fighter (WarriorPAC): <https://www.youtube.com/watch?v=GczJN-xL8Dg>

Emily Cornell  
Senior Vice President, Political Affairs



CA Cambridge Analytica

[REDACTED]

<https://cambridgeanalytica.org>

On Sep 14, 2016, at 12:45 PM, Emily Cornell [REDACTED] wrote:

New ad the SuperPAC released yesterday.

<https://www.youtube.com/watch?v=Lt2QVtWtdjQ>

Emily Cornell  
Senior Vice President, Political Affairs

[REDACTED]

CA Cambridge Analytica

[REDACTED]

[REDACTED]

[REDACTED]

<https://cambridgeanalytica.org>



On Sep 9, 2016, at 9:31 PM, Al Han [REDACTED] wrote:

Exactly what I need to show potential clients.

Thanks Em,  
Al

On 9 September 2016 at 16:57, Emily Cornell [REDACTED] wrote:  
Per the feedback on the Sales call today, below are links to client videos managed by CA. These are produced by Glittering Steel, our production partner. These are all recent. More will be posted to this YouTube channel, so check back for further content. Will send along other relevant ads on a regular basis.

Em

Dishonorable: [https://www.youtube.com/watch?v=bIQj\\_3SO\\_4Y&list=UURvnu9aLecF\\_JM6D0E0ga-w](https://www.youtube.com/watch?v=bIQj_3SO_4Y&list=UURvnu9aLecF_JM6D0E0ga-w)

Clinton Foundation Fails on Equal Pay: [https://www.youtube.com/watch?v=Sd3TimpNJek&index=4&list=UURvnu9aLecF\\_JM6D0E0ga-w](https://www.youtube.com/watch?v=Sd3TimpNJek&index=4&list=UURvnu9aLecF_JM6D0E0ga-w)

Hillary Clinton is Still Lying: [https://www.youtube.com/watch?v=AE\\_oxMuE7Wk&index=5&list=UURvnu9aLecF\\_JM6D0E0ga-w](https://www.youtube.com/watch?v=AE_oxMuE7Wk&index=5&list=UURvnu9aLecF_JM6D0E0ga-w)

Bernie Never Stood a Chance: [https://www.youtube.com/watch?v=FiU6Pdif31c&list=UURvnu9aLecF\\_JM6D0E0ga-w&index=7](https://www.youtube.com/watch?v=FiU6Pdif31c&list=UURvnu9aLecF_JM6D0E0ga-w&index=7)

Gotta Pat the Bills: [https://www.youtube.com/watch?v=ZDI8-vECFQ4&list=UURvnu9aLecF\\_JM6D0E0ga-w&index=6](https://www.youtube.com/watch?v=ZDI8-vECFQ4&list=UURvnu9aLecF_JM6D0E0ga-w&index=6)

Emily Cornell  
Senior Vice President, Political Affairs

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

<https://cambridgeanalytica.org>

--

AL HAN







Special Advisor

[REDACTED]

[REDACTED]

# EXHIBIT L

CAMBRIDGE ANALYTICA

Project Name	Project Value	Start Date	End Date	PM	Status	Issues	Action Required
 Make America Great Again!   Donald J Trump for President	Data Analytics, Research, Digital Marketing	June-16	Nov-15	M/O	Active	On track.	
 Make America #1	Creative, TV, Digital	July-16	Nov-16	EC	Active	On track.	
 Heritage Foundation	\$120,000 (of which \$100,000 ad buy)	Dec-15		KK/MS	On hold		Meeting with Molly/PK/KK on Tues. 13th Sep. to evaluate how ads have been performing over the past two days.
 Job Creators Network	Digital Marketing			EC	Active	The goal is to launch the campaign this week but it depends on the creative.	
 Goldline	c. \$65k	12-Jan		AT/KK	Active	Creative brief approved on Friday, 1st draft to be delivered tomorrow. Campaign to be relaunch next week.	
 Relationship Enrichment Collaborative	Expected ad spend (\$1.1 million)	05-Apr		HE	Active	New events in Sep and Oct. HE to upload audiences to FB. Expanding the internal	

(REC)

database.



National Shooting Sports Foundation (NSSF)  
 Research, Data Analytics and Digital Marketing

05-Apr

MO/P  
 WB/  
 MA

Active

Survey ran last week; report which will be delivered on Wed.

(DM -- paid upfront monthly)

In a process of obtaining more data from gun brokers.

Estimated value

\$3,45+\$180k+\$

1.9m/in

Ads from one of the states were pulled out. Budget will be allocated elsewhere.

Model refresh will be delivered in coming weeks what will release some resources off.



FCCC (NRA TTV/ The Herald Group)

\$855,000

05-Apr

PW/B/  
 MO

Active

Budget spread out to run until the end of the month/early October.

Success being reported through bi-weekly reports.



WGBH Educational Foundation  
 \$48,000  
 Data Matching Contact List






June 2016

TE

Active

Debrief call with client and follow up with Duke on Tues (TE).

Briefing packs

	Ackerman McQueen	Research/Data Analytics		PWB	Active	Starting online community. Putting together a video which will outline high level findings. Report expected this week. Observing the online community and adding any additional questions to the survey.	Only 18/35 respondents - PK to email suppliers to increase recruitment efforts.
	The Bolton Pac	Data Analytics		PWB			
	Warrior PAC - Senate Louisiana	Data and digital marketing		EC		Discussed the final version of the ad. Three proposed options from Centriply. Awaiting client's decision.	
	The Economist	Analytics, digital and TV	Aug	PK/OK	New	4 proposals, content to be confirmed with their digital team	Funding tbc after board meeting in NY
	Bill Allstrom	\$3,000 Contact list	Sep	AW	New	Short term project which will involve BI's and AW's time.	



Vote For Y  
Committee

Digital  
Marketing

PWB

**SELECTIONS/SCI SOCIAL**



IML Consulting  
(Nigeria)

Data Analytics  
(\$14,000)

Aug-2016

Duration: 2-3  
weeks

JH

1. Contract to be signed
2. Timelines to be confirmed
3. Resources: 1 x Data Scientist + JH



Kenya

JH to provide an update

**INTERNAL DEVELOPMENT**



Documentation  
library

May-2016

24 June 2016

PK

On  
hold

Larger discussion on hold



Hub spot

Automatic notifications  
are being fixed (tasks to  
be assigned to PWB)



Ab testing

# EXHIBIT M



# Re: Meeting Updates

---

**From:** Ed DeNicola <[REDACTED]>  
**To:** Matthew Atkinson [REDACTED]  
**Cc:** Brian Best [REDACTED], Brittany Kaiser [REDACTED]  
**Date:** Wed, 22 Feb 2017 02:36:41 +0000

---

Hi all --

This is actually the Donald J. Trump for President case study and not the one for the Super PAC. We did data analytics and ad targeting for the Make America Number One Super PAC in addition to the work we did for the DJTfP campaign. I need to update the label.

Ed

On 21 February 2017 at 20:13, Ed DeNicola <[REDACTED]> wrote:

Hi all --

Attached is a finished case study for the Make America Number One Super PAC. I'm trying to get a hold of Brittany to send the other case study she had in mind. She's at a business event in NYC tonight.

Best regards,  
Ed

On 21 February 2017 at 18:30, Matthew Atkinson [REDACTED] wrote:

Brian,

I am glad to hear that! My apologies, I could not join in person. Hopefully, I can be in-person for the next meeting. I am looping in Ed who might be able to help here.

Best,  
Matthew

On Tue, Feb 21, 2017 at 6:21 PM, Brian Best [REDACTED] wrote:

Hi Brittany/Matthew,

Great meeting earlier, the team was really impressed.

Is there any way you could get the case studies to us tonight?

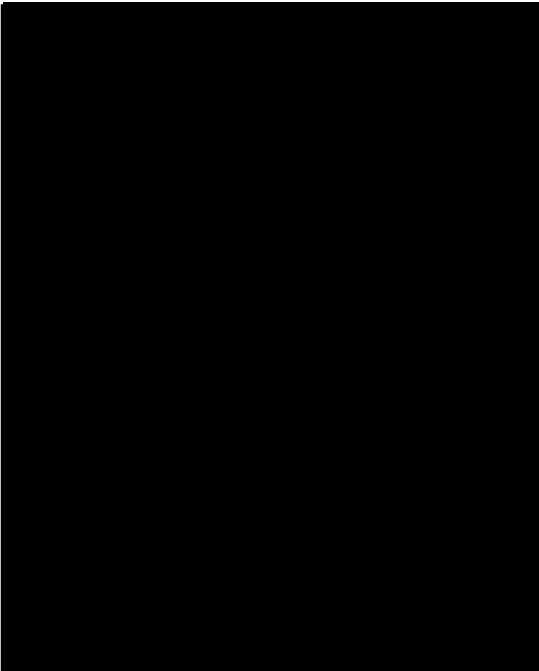
We were hoping to meet tomorrow and figure out our next meeting with you and get this process rolling towards a signed contract.

Brian R. Best  
Director, Digital Marketing  
Tommie Copper  
[REDACTED]

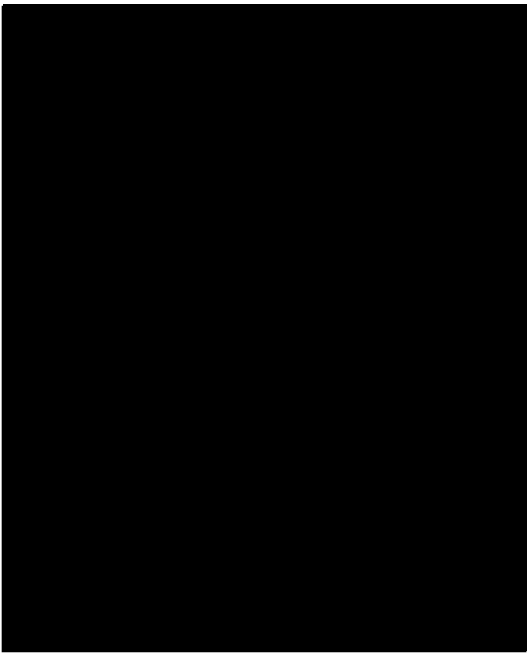
--  
**Matthew Atkinson**  
Digital Director



--  
**Ed DeNicola**  
Head Of TV



--  
**Ed DeNicola**  
Head Of TV



# EXHIBIT N

**From:** Robert Murtfeld [REDACTED]  
**Sent on:** Wednesday, March 8, 2017 8:33:04 PM  
**To:** Claire Anastasia [REDACTED]; Brittany Kaiser [REDACTED]  
**Subject:** Berkshire on NYT

FYI

----- Forwarded message -----

**From:** Robert Murtfeld [REDACTED]  
**Date:** 6 March 2017 at 22:48  
**Subject:** Re: Re:  
**To:** Blake Gottesman [REDACTED]

Exactly.

**On 6 March 2017 at 22:46, Blake Gottesman [REDACTED] wrote:**

I hear you. Never fun to be the target of these things. In the end, results will provide the best defense / response.

---

**From:** Robert Murtfeld [REDACTED]  
**Sent:** Monday, March 06, 2017 10:36 PM  
**To:** Blake Gottesman [REDACTED]  
**Subject:** Re:

Many thanks, Blake.

Yes this is the same hostility levelled against us just like in the Ad Age article by unhappy Republican operatives. It is also really upsetting to see publications such as the NYT that I cherish pick whatever fits their thesis. We've done good work for the Financial Times, which is publicly known (an investigative piece such as this one could have easily found out), we are up for a David Olgyvy award by the Advertising Research Foundation on 20 March (see [here](#)). And yes whilst the Trump campaign only used tone analysis and persuasion scores for analytics, our work for the Super PAC used psychographics throughout (but we don't want to run around with this as the Super PAC was called Defeat Crooked Hillary).

These are just a couple of points. Hope this helps. Let me know.  
R

On 6 March 2017 at 18:21, Blake Gottesman [REDACTED] wrote:

Tough piece in NYT

---

**Blake Gottesman** • Principal

Berkshire Partners LLC • [REDACTED] | [REDACTED] | [REDACTED]

[www.berkshirepartners.com](http://www.berkshirepartners.com)

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# EXHIBIT O

# Re: Invitation: Inaugural Cocktail Party with Cambridge Analytica

---

**From:** Charlotte Escaravage [REDACTED]  
**To:** Brittany Kaiser [REDACTED]  
**Date:** Thu, 12 Jan 2017 21:16:30 +0000

---

Thanks! Will do.  
Will meet Alexander in person and see where it goes from there.

On Jan 12, 2017, at 04:10 PM, Brittany Kaiser [REDACTED] wrote:

Anything I can do, you let me know.

For now everything has had a very welcomed reception and I think you can have what you want, in terms of meetings and feedback at minimum (since I believe you will get along famously with these lovely people).

Sent from my iPhone

On Jan 12, 2017, at 8:58 PM, Phillip Escaravage [REDACTED] wrote:

I am pretty prompt. Thanks so much for helping me with this.

Sent from my iPhone

On Jan 12, 2017, at 3:51 PM, Brittany Kaiser [REDACTED] wrote:

That is fantastic, and again I thank you for your hospitality and prompt replies all day while I try to forget the quality of the wine I'm drinking even in first class....

Alexander is confirming their attendance to you in writing. You can feel free at any point to bring up the meeting with Steve to Alexander directly who can fix it for you.

Alexander, Bekah and Steve are best friends and founded our company together as the three of them. Kelly Anne Conway is also a best friend of theirs but is not on our board (though we work with her extensively).

Some good recent background about them, the administration and our company: (pasted in full below for convenience):

<http://www.wsj.com/articles/meet-the-mercera-a-quiet-tycoon-and-his-daughter-become-power-brokers-in-trumps-washington-1483904047>

## **Meet the Mercers: A Quiet Tycoon and His Daughter Become Power Brokers in Trump's Washington**

Armed with data on an alienated electorate, a hedge-fund magnate and his family shun the GOP establishment to support the winning campaign;



## advising on cabinet selections

Hedge fund executive Robert Mercer and his family are poised to become major power brokers in Donald Trump's Washington. WSJ's Keach Hagey joins Lunch Break with Tanya Rivero and explains how the Mercers saw the appetite among voters for an outsider candidate as early as 2014. Photo: Sylvain Gaboury/Patrick McMullan Agency

By **GREGORY ZUCKERMAN, KEACH HAGEY, SCOTT PATTERSON** and  
**REBECCA BALLHAUS**

Jan. 8, 2017 2:34 p.m. ET **2**

In February 2014, a group of conservative political donors gathered at New York's Pierre Hotel to strategize about the coming presidential contest.

Robert Mercer, a computer programmer and hedge-fund manager who distrusted the political establishment and loathed Bill and Hillary Clinton, issued a warning: Data he had seen indicated mainstream Republicans such as Jeb Bush and Marco Rubio would have difficulty winning the White House in 2016, according to one of the attendees. He said only a true outsider with a sense of voters' frustrations could win.

Nearly three years later, Donald Trump is headed to the White House, helped by the 70-year-old Mr. Mercer and his daughter Rebekah, 43. They are poised to become major power brokers in Mr. Trump's Washington.

Back when Mr. Trump's candidacy was on the rocks, Mr. Mercer, co-chief executive of hedge fund Renaissance Technologies LLC, provided financial support. Then, in a surprise shake-up in August, two of the Mercer family's confidantes, Steve Bannon and Kellyanne Conway, were installed atop the Trump campaign following a recommendation from Ms. Mercer.

"The Mercers are incredible people who truly love this country and go all out to protect America and everything it stands for," Mr. Trump said in a written statement to The Wall

Street Journal.

Mr. and Ms. Mercer won't have any formal roles in the Trump administration. Ms. Mercer, who has been working from Mr. Bannon's office in Trump Tower, is advising on the selection of nominees to Mr. Trump's cabinet. Mr. Bannon and Ms. Conway are headed for influential White House roles. Ms. Mercer likely will help lead an outside group designed to support Mr. Trump's agenda, Ms. Conway has said.



Mr. Mercer and his wife, Diana, were the third-largest donors to Republicans in the 2016 election, after Sheldon and Miriam Adelson and Paul Singer, according to the Center for Responsive Politics. The GOP is now counting on Mr. Mercer to help the party gain more seats in the House and Senate in 2018. Ms. Conway says if the GOP captures more than 60 Senate seats, "Bob Mercer will be one of the people to thank."

Mr. Mercer and his daughter both declined to comment for this article. This account of Mr. Mercer's career and his family's involvement in the Trump campaign is based on interviews with current and former employees of Renaissance and others in the hedge-fund industry, along with people who have dealt with both of the Mercers in the political

arena.

Every new administration, especially one built around a political outsider, brings a new crop of people to Washington, where they assume various positions of power, often informal.

It isn't clear what specific policies or positions, if any, the Mercers are seeking for their support of Mr. Trump. Peter Schweizer, who co-founded a research organization funded by the Mercers, notes: "Bob Mercer does not want to be ambassador to France."

Mr. Mercer, for his part, is an unlikely kingmaker. A taciturn man, he often sits through meetings without uttering a word. He once told a colleague he preferred the company of cats to humans.

Growing up in New Mexico, Mr. Mercer became fascinated by computers at a young age, he said in a speech several years ago. During the summer after his senior year in high school in 1964, he attended a National Youth Science Camp and learned to program a donated IBM computer.

"Computers were not much of interest to my fellow campers, so I got to use the [computer] all by myself most of the time," Mr. Mercer said in the speech.

While working toward a physics and mathematics degree from the University of New Mexico at Albuquerque, Mr. Mercer got a job nearby at the Kirtland Air Force Base's weapons lab. He rewrote the lab's computer program, making it 100 times faster, but his bosses didn't do much with his work, he said in the speech.

The experience "left me ever since with a jaundiced view of government-financed research," he said.

After receiving a Ph.D. in computer science, he joined International Business Machines Corp. and forged a partnership with scientist Peter Brown. Their group helped develop an innovative approach to computerized speech recognition. Mr. Mercer eventually grew frustrated with what he saw as IBM's inability to capitalize on their advances, two ex-

colleagues say. IBM declined to comment.

In 1993, Renaissance, which relies on computers and complex algorithms, hired Mr. Brown. Mr. Mercer decided to join, too, though he initially expressed concern to a colleague about how much trading contributed to society.

When Renaissance researchers encountered a challenge no one could figure out, they would bring it to Mr. Mercer, who would go into seclusion until it was solved, says one person who worked with him. Colleagues dubbed him the "Big Gun."

Messrs. Mercer and Brown eventually revolutionized Renaissance's approach to trading stocks and commodities, partly by eliminating the human element from trading decisions and by fine-tuning the firm's trading models. Last year, Renaissance's assets climbed above \$36 billion, from \$27 billion in 2015, even as many rivals stumbled. The two men became co-CEOs in 2010.

Early on, Mr. Mercer's conservatism was on display in his support for the gold standard and his animosity toward the Clintons. "He thought [Bill] Clinton was a crook," says former Renaissance employee Nick Patterson.



President-elect Donald Trump arrived for a holiday party at Mr. Mercer's Long Island, N.Y., estate in December. *PHOTO: EVAN VUCCI/ASSOCIATED PRESS*

He often challenged mainstream views. When University of California, Berkeley, physicist Richard Muller visited Renaissance in 2011 to lecture on his doubts about global warming, Mr. Mercer buttonholed him afterward to share his own skepticism.

Mr. Mercer was "distrustful of the science," Mr. Muller recalls. "It's a scientist's duty to be skeptical, and the original measurements had unaccounted systematic problems that could have been important."

Mr. Mercer and his daughter Rebekah began financing Mr. Muller's research. The physicist eventually concluded that global temperatures likely have risen because of human activity. Mr. Mercer "seemed satisfied with our [recent] results and accepts them," Mr. Muller says.

In the 1990s and early 2000s, Ms. Mercer, a Stanford University graduate, worked in Renaissance's trading business. She left to home-school her children and, with her sisters, open a Manhattan cookie and brownie shop that turned into an online company.

After meeting Andrew Breitbart at a conservative conference, Mr. Mercer and his daughter in 2011 became interested in investing in his right-wing news organization, Breitbart News Network.

Mr. Breitbart introduced the Mercers to his friend Mr. Bannon, a former Goldman Sachs Group Inc. investment banker. Mr. Bannon drew up a business plan and term sheet under which the Mercer family bought nearly 50% of Breitbart News for \$10 million, according to public filings and people familiar with the matter.

In March 2012, Mr. Breitbart collapsed on a Los Angeles sidewalk and died of heart failure at age 43. Mr. Bannon and the Mercers convened an emergency meeting in New York to determine Breitbart's future, according to people familiar with the matter.

Mr. Bannon became the site's executive chairman, eventually gaining influence over the editorial side of the publication. Breitbart became popular with the "alt-right," a loose conglomeration of groups, some of which embrace tenets of white supremacy and view

immigration and multiculturalism as threats. In November, Mr. Bannon told a Wall Street Journal opinion writer he is an economic nationalist, not a white supremacist. He declined to comment for this article.

Disappointed by President Barack Obama's 2012 re-election, Mr. Mercer intensified his political activity. In 2013, he and Ms. Mercer, together with Mr. Bannon, started the watchdog group Reclaim New York to track what they viewed as excessive public spending.

That year, Patrick Caddell, a former pollster for Jimmy Carter who has been critical of top Democrats, shared data with Mr. Mercer showing voters were becoming alienated from both political parties and mainstream candidates. After asking Mr. Caddell to do another round of polls and collecting his own data, Mr. Mercer concluded that a major shift was under way, Mr. Caddell says.

Mr. Mercer "understands trends and data at a level missed by many," Ms. Conway says.

Toby Neugebauer, a conservative energy investor who met with Mr. Mercer in 2014, says Mr. Mercer predicted that immigration and trade would be central themes of the 2016 campaign.

"He and Rebekah were looking for an outsider to shake things up in Washington," Mr. Neugebauer says.

Sometimes, father and daughter would walk through Republican fundraising events locked arm-in-arm. The sociable Ms. Mercer did most of the talking, while her father stood silently beside her.

Breitbart's online traffic was soaring, validating the Mercers' faith in Mr. Bannon. When Mr. Mercer hosted Mr. Bannon on Mr. Mercer's 203-foot yacht, the Sea Owl, Mr. Bannon wore shorts, cursed freely and held forth like a close relation, according to people who visited the yacht.

Mr. Mercer's yacht, the Sea Owl, in London in 2013. *PHOTO: ROB POWELL/LONDON NEWS PICTURES/ZUMA PRESS*

Mr. Bannon advised the Mercers on which political and media ventures to invest in, escorting potential beneficiaries to Ms. Mercer's triplex apartment at Trump Place on Manhattan's Upper West Side, according to people familiar with the situation.

As the 2016 campaign got under way, the Mercers were focused on causing political upheaval rather than backing a specific candidate, friends say. "The Mercers' view is not really tied to a particular person," says Mr. Schweizer, who with Mr. Bannon co-founded the Government Accountability Institute, a research group funded by the Mercers.

The Mercers initially supported Texas Sen. Ted Cruz, giving a pro-Cruz super PAC more than \$13 million. Even so, Ms. Mercer told Mr. Schweizer that if his institute uncovered corruption involving Mr. Cruz, "we expect you to report on it," according to Mr. Schweizer.

When Mr. Cruz dropped out of the race last May, the Mercers pivoted to Mr. Trump, the party's effective nominee. "Bob and Bekah got behind Trump because he was clearly an antiestablishment candidate," says Mr. Caddell, the pollster. "It's a philosophical thing. They think the establishment has failed and is self-serving."

In July, the Mercers gave \$2 million to a super PAC supporting Mr. Trump. At a fundraiser in August, Ms. Mercer suggested to Mr. Trump he shake up his campaign,

recommending that two of her confidants take control, according to two people familiar with the conversation.

Shortly thereafter, Mr. Trump installed Mr. Bannon as CEO and Ms. Conway as campaign manager. Ms. Conway had helped Ms. Mercer run Keep the Promise, a super PAC funded by the Mercers that had supported Mr. Cruz.

At Renaissance, many employees initially shrugged off Mr. Mercer's political activities, assuming Mr. Trump would lose, and few were aware of the extent of Mr. Mercer's involvement with Breitbart, according to people familiar with the firm. Later in the campaign, however, some Renaissance executives chafed at the unwanted publicity that Mr. Mercer's political activities brought the firm, those people say.

Renaissance's chairman and founder, James Simons, is a major donor to Democratic causes, including Hillary Clinton's campaign. Mr. Simons declined to comment.

After Mr. Trump's upset victory, one of his first decisions was to appoint Mr. Bannon as his chief White House strategist. He later named Ms. Conway as his White House counselor.

Ms. Mercer was appointed to the 16-member executive committee of Mr. Trump's transition team, which is responsible for recommending administration officials. She has weighed in on personnel decisions including successfully lobbying against Mitt Romney as secretary of state and for Sen. Jeff Sessions as attorney general, according to people familiar with the matter.

Once Mr. Trump takes office, Ms. Mercer is likely to help lead an outside group, funded by her father, aimed at bolstering Mr. Trump's agenda, Ms. Conway says. Republican operatives expect the organization will build its messages based in part on information collected by Cambridge Analytica, a data firm backed by the Mercers that worked on Mr. Trump's campaign.



On Dec. 3, Mr. Mercer hosted his annual holiday party at his Long Island estate, Owl's Nest, a bash at which most guests wear costumes. The party's theme this year was "heroes and villains." Mr. Bannon and Ms. Conway brought Mr. Trump as a surprise guest.

As the revelers settled in, Mr. Trump rose to speak, according to two attendees, joking that he had just had his longest conversation ever with Mr. Mercer—two words. He lauded the contributions of Mr. and Ms. Mercer to his campaign, then joined the Mercers, Mr. Bannon and Ms. Conway at the head table.

Sent from my iPhone

On Jan 12, 2017, at 3:53 PM, Phillip Escaravage [REDACTED] wrote:

Brittany,

I would love to have them. Would be happy to meet both of them.

Phillip

Sent from my iPhone

On Jan 12, 2017, at 2:36 PM, Brittany Kaiser [REDACTED] wrote:

Phillip,

May I ask a favor of you? The conversation today went very well.

Rebecca Mercer wants to meet with you and Alexander together. She will be attending our event on Thursday and wondered whether there is space for her and Alexander to join your event on Friday?

If you invite them they said they will both come.

Let me know and I will fix it in their diaries. I'm guessing they will leave the official ball early and come join us at yours.

There may also be an invite we can extend to you for a big event Saturday which has not been confirmed yet.

Best,

B

Sent from my iPhone

On Jan 12, 2017, at 2:45 PM, Phillip Escaravage [REDACTED] wrote:

I would like to give Steve my two cents. Nate should be on NSC for North Africa.

This meeting is with someone that Steve should absolutely speak to before the 20th. It will give him deep insight to Libya that will carry him for a while.

Sent from my iPhone

On Jan 12, 2017, at 1:42 PM, Brittany Kaiser [REDACTED] wrote:

If it's for appointments that would be very good since they still need help and are a long way off filling all the roles, from what I understand.

Alexander might be able to arrange that, or I can introduce you to Steve on emails or by phone but he listens to Alexander's needs of course higher priority than my own so a request from the CEO is a better strategy.

Let me know, and also Alexander should get back to you by this evening or tomorrow morning at the latest when he's out of Trump Tower etc

Sent from my iPhone

On Jan 12, 2017, at 2:36 PM, Phillip Escaravage [REDACTED] wrote:

I may have someone in the US by the 17th that Steve Bannon absolutely should meet with before the 20th.

Sent from my iPhone

On Jan 12, 2017, at 12:40 PM, Brittany Kaiser [REDACTED] wrote:

All good and noted.

Yourselves and your guests are confirmed on the security list as of a few minutes ago. Let me know if you require last minute additions before the 18th!

Sent from my iPhone

On Jan 12, 2017, at 1:32 PM, Phillip Escaravage [REDACTED] wrote:

That's too funny!  
Probably no need to meet with Mohammed Bashir at this time. But thanks for thinking of it!

Sent from my iPhone

On Jan 12, 2017, at 11:21 AM, Brittany Kaiser [REDACTED] wrote:

I just sent her a Facebook message with her RSVP and we are giggling over this. It is hilarious.

On a side note, one of my good friends Mohamed Bashir, son of Ghaddafi's head of the LAP, one of Africa's biggest investors (more than Hosni Bei for Libya) might be in town. If so I'd like to introduce you if you have the time:

[https://en.m.wikipedia.org/wiki/Bashir\\_Saleh\\_Bashir](https://en.m.wikipedia.org/wiki/Bashir_Saleh_Bashir)

Sent from my iPhone

On Jan 12, 2017, at 12:01 PM, Phillip Escaravage  
[REDACTED] wrote:

She is dating my close friend Alex

Sent from my iPhone

On Jan 12, 2017, at 11:00 AM, Brittany Kaiser  
[REDACTED] wrote:

No way! I am friends with Antalya from London.

We met at my friend's birthday party last January in an old manor home in the countryside. (Conor actually attended that party at my invitation, so he knows her now too).

The world gets smaller...

Sent from my iPhone

On Jan 12, 2017, at 11:46 AM, Phillip Escaravage  
[REDACTED] wrote:

Phillip and Charlotte Escaravage  
HRH Prince Alex von Preussen  
Alexia Bergstrom  
Basem Saleh  
Antalya Nall-Cain

Sent from my iPhone

On Jan 12, 2017, at 10:37 AM, Brittany Kaiser  
[REDACTED] wrote:

Fantastic. You and Charlotte plus four I assume? I will have my assistant add you all to the list just now.

If you have names/titles of your guests before next Wednesday that would be very helpful just in case the security attempt to make our lives difficult! I think everyone may need a photo ID but I will confirm closer to the time.

Best,

B

Sent from my iPhone

On Jan 12, 2017, at 10:52 AM,  
Phillip Escaravage

[REDACTED] wrote:

Brittany,

I would love to come. I have six people total including me. Let me see how the schedule looks.

Phillip

Sent from my iPhone

On Jan 12, 2017, at 9:49 AM,  
Brittany Kaiser

[REDACTED] wrote:

Dearest Phillip,

I know you and Charlotte may not be in town next Thursday, but I wanted to extend my invitation we discussed regardless.

And of course any of your friends and colleagues are welcomed in our new DC home. They can RSVP directly to me or through the email on the invite below.

We need round numbers by today if at all possible, but I can still add people to the security list up to 24 hours ahead of time.

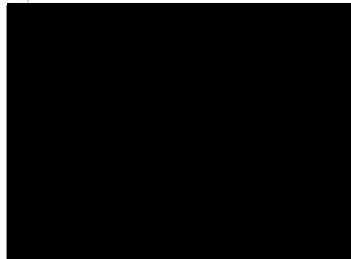
All the best,

B

<Inaguration-Invite-V1.jpg>

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**Brittany Kaiser**,  
PhD Candidate, MPhil,  
LLM, MA Hons  
Director of Program  
Development



**CA Cambridge  
Analytica**



<https://cambridgeanalytica.org>

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