

OFFICE OF
GENERAL COUNSEL
BEFORE THE FEDERAL ELECTION COMMISSION

2018 JUL 19 PM 2: 18

In the matter of:

John James for Senate, Inc.)

Outsider PAC)

Grand River Strategies)

MUR 7432

My name is Justin L. Brown, Justin@brownbrotherslaw.com, 1827 Harley Drive, Ann Arbor Michigan 48103. I am the treasurer of the Sandy Pensler for Senate campaign and I have reason to believe our opponent John James is illegally coordinating his campaign commercials with an independent expenditure committee through the use of a common vendor named Grand River Strategies.

Attached please find a link to two campaign commercials: one by the James campaign and one by the Outsider PAC. In each commercial the identical footage of candidate Pensler is used, which was taken by James campaign and then shared with the independent committee. The commercials also use nearly identical language and graphics.

FEC reports which are attached to this complaint reveal that both the James campaign and the so-called independent Outsider PAC use the same media consultant: Grand River Strategies. This firm apparently has only two principals, Stu Sandler and Jamie Roe, and operates from one small office in Lansing, Michigan.

The regulations of the Federal Election Commission are clear: an independent expenditure committee cannot republish campaign materials prepared by a candidate. 11 CFR 109.21(c)(2). Such re-use results in a prohibited in kind contribution occurring from the independent committee to the candidate campaign. 109.21(b).

The James campaign first published its version of the commercial on YouTube on July 10. The Outsider PAC published its version with the campaign's footage just six days later according to that committee's press release, copy attached. And according to our media consultant, it would not be possible to use the campaign's commercial as it appeared on television to create the independent ad: the differences between the two uses means the PAC had to have access to the original source footage to publish it the way it did. It uses the same source footage. Based on the proximity of text to tie, there is no way for the PAC to make the spot by pulling footage of James spot from YouTube.

Because the James and Outsider PAC committees used the same footage created by the James campaign and used the same vendor to do so, all these entities have violated the standard of "independence" for expenditures and should be investigated and fined as required under the law.

With all due respect to the Commission, there could not be a clearer example of unlawful coordination than what is occurring in this case.

1004747-1

Justin Brown

Justin Brown
Treasurer, Sandy Pensler for Senate

Signed and sworn before me: 7-17-16

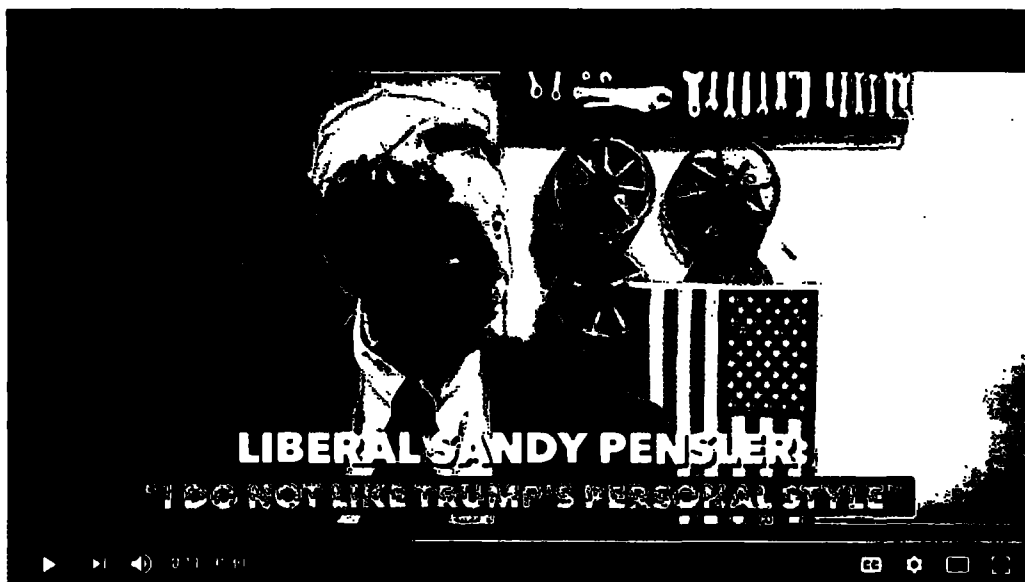
[Signature]
Notary Public

SCOTT REPINE
Notary Public - State of Michigan
County of Washtenaw
My Commission Expires Oct 20, 2024
Acting in the County of *Washtenaw*

Attachments:

John James campaign commercial

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



Liberal Sandy Pensler Mocks President Trump Just Like A Democrat!

711 views

16 91



John James
Published on Jul 19, 2019

SUBSCRIBE 219

Conservative outsider & army veteran John James needs your help in two big ways:

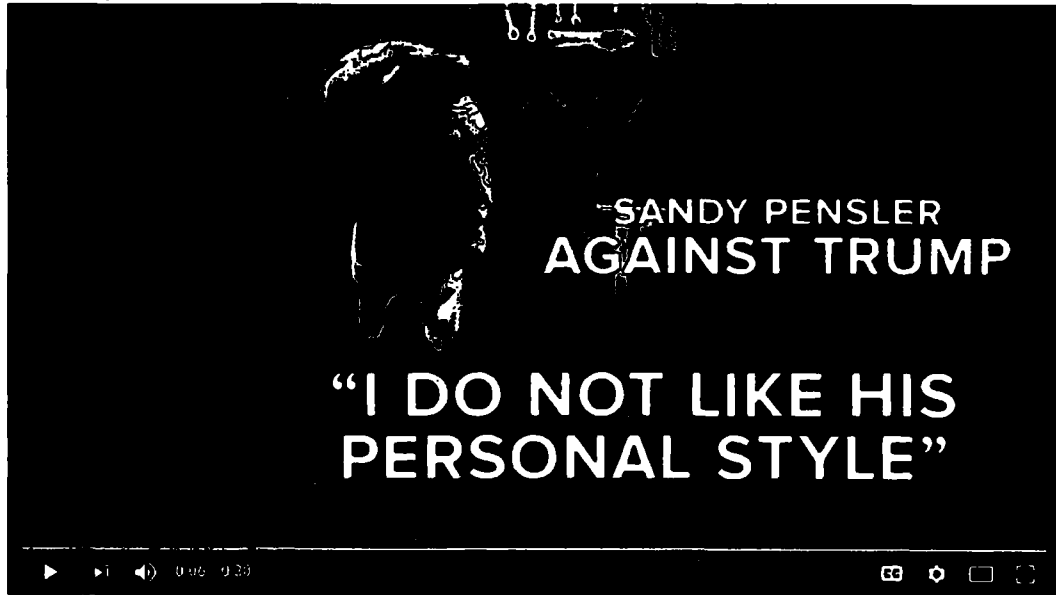
- 1) Join our growing army here [JohnJamesforSenate.com](https://www.johnjamesforsenate.com)
- 2) Donate now to help get our message out <https://secure.johnjamesforsenate.com/>

SHOW MORE

10044474901

Outsider PAC campaign commercial

<https://www.youtube.com/watch?v=wJlti5BorBE&feature=youtu.be>



Difference

Unlisted

574 views



Outsider PAC

Uploaded on Jul 14, 2018

Category

People & Blogs

License

Standard YouTube License

SUBSCRIBE

John James FEC report – page 379 at <https://www.fec.gov/data/committee/C00651208/?cycle=2018&tab=filings>

Full Name (Last, First, Middle Initial) B. GRAND RIVER STRATEGIES		Date of Disbursement 03 / 29 / 2018	
Mailing Address 2420 MULBERRY COURT		FEC Identification Number C	
City ANN ARBOR	State MI	Zip Code 48104	Amount of Each Disbursement this Period 7500.00
Purpose of Disbursement STRATEGY CONSULTING		Category/ Type	Transaction ID : SB17.11664
Candidate Name		Disbursement For: 2018 <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	<input type="checkbox"/> Memo Item
Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President	State: District:		

Outsider PAC FEC report

Soo: <http://docquery.fec.gov/pdf/808/201807159115526808/201807159115526808.pdf>

Q2: <http://docquery.fec.gov/pdf/347/201805169112069347/201805169112069347.pdf>

Website of Grand River Strategies

<http://grandriverstrategies.com/bios/>

Press Release of Outsider PAC

<https://mailchi.mp/1fba957b0b4/for-immediate-releaseoutsider-pac-will-work-to-ensure-a-conservative-is-nominated-for-senate-in-gop-primary?e=51f032b4fc>

OUTSIDER PAC

For Immediate Release

July 16, 2018

Contact: Jamie Roe

586-770-8007

**Outsider PAC Will Work to Ensure A
Conservative Is Nominated for Senate in GOP
Primary**

Releases first ad entitled "Difference"

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