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Shadow Campaigns: The Shift in Presidential Campaign Funding to Outside Groups

By Ian Vandewalker

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INTRODUCTION

Fundraising in the 2016 presidential race is unlike anything seen before. Just a few months into the presidential race, ostensibly independent groups have raised hundreds of millions of dollars, greatly outpacing the candidates' own campaign committees. The vast majority of the money raised so far has been collected by outside groups not subject to contribution limits. Although these groups are purportedly independent of the campaign, the reality is that most of them have ties to the candidate. While it is still early in the campaign cycle, these numbers appear to reflect a fundamental shift in how presidential campaigns are funded in the United States, a consequence of the explosion in outside money ignited by the deregulatory *Citizens United* decision.

Although there has already been some [important reporting](#) on how much leading candidates and the groups supporting them have raised, this analysis is the first to systematically examine the reported links between all the candidates and outside groups. This allows us to measure the extent to which financial resources so far this cycle are held by outside groups that have reported ties with the candidates they support — we call these groups “shadow campaigns.” We use recently-released FEC data to do this in the aggregate in Part I, as well as for each campaign in Part II.

Across all 21 presidential candidates, campaign committees raised \$129 million in 2015 while outside groups supporting particular candidates raised more than twice as much: \$283 million. Almost all of the outside money, \$273 million, is going to groups reported to have ties to one particular candidate. And 95 percent of the outside money, or \$270 million — has been collected by groups not subject to contribution limits. The numbers raise questions about whether big donors are attempting an end-run around the strict limits on contributions to candidates' formal campaign committees.

Importantly, despite the massive sums reported here, we know that our analysis underestimates the true extent of fundraising by outside groups, including those that are not subject to contribution limits and may have ties to their favored candidate, because “dark money” organizations have not yet been required to report their revenue.

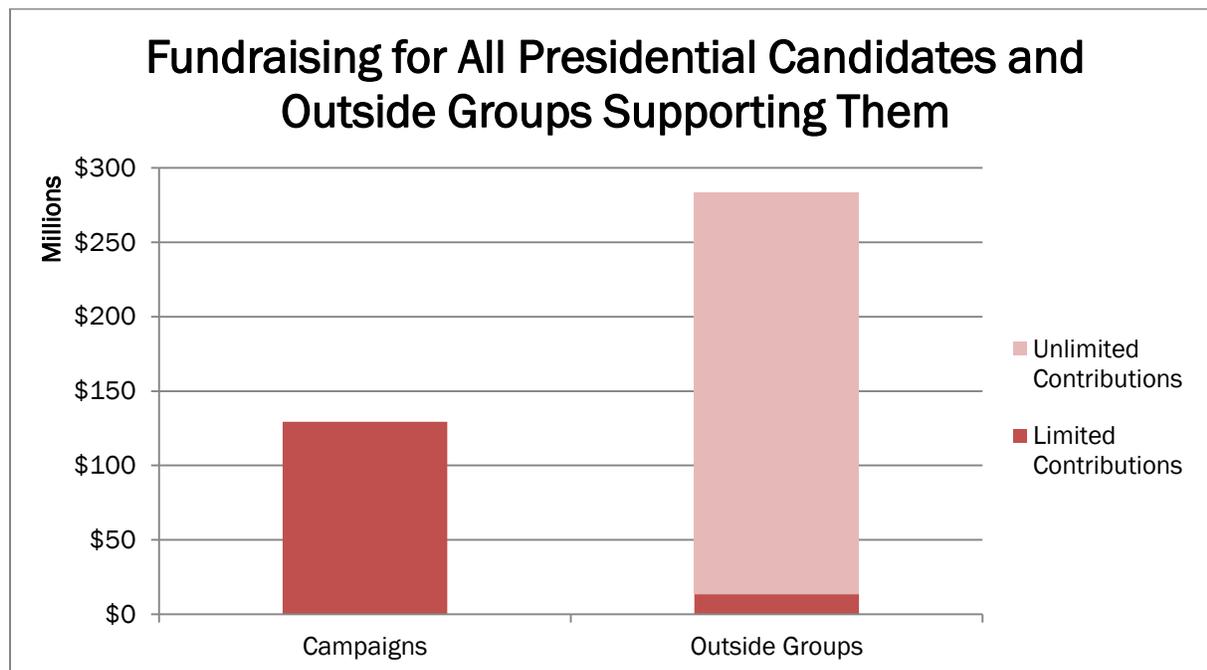
The advantage of funds raised through unlimited-contribution groups is obvious. One wealthy donor can write a check for millions. Campaign committees, on the other hand, are limited to donations of \$2,700 for the primary election. In theory, candidates are not permitted to “coordinate” with groups that can raise unlimited funds. But with [flawed coordination rules that go almost entirely unenforced](#), in reality the path is open for candidates to work closely with, and even exert control over, supportive outside groups — even to the point of assigning close advisers to run them.

To find a precedent for the proliferation of groups backed by wealthy donors and dedicated to electing a specific candidate, it is necessary to look back to the pre-Watergate era, when candidates formed many supposedly independent committees, each of which could take a contribution up to the limit (effectively multiplying the cap by the number of committees). The Federal Election Campaign Act of 1971 put a stop to that practice by limiting all candidates to a single authorized committee.

Citizens United administered a shock to the post-Watergate system whose full effects we are only now beginning to see — although Congress and the Federal Election Commission share the blame due to their failure to effectively regulate outside groups even within the bounds set by the Supreme Court. As a result, as the first set of fundraising totals reflects, donors can now offer financial support to candidates far in excess of candidate contribution limits. The full impact of this trend in the race for 2016 remains to be seen.

I. Outside Groups Raised More Money Than the Campaigns

Across all 21 presidential candidates, **campaign committees raised \$129 million in 2015 while outside groups supporting a single candidate raised more than twice as much: \$283 million.** Many 2016 contenders have been outraised several times over by the groups supporting them as of the end of June, a phenomenon not seen in the post-Watergate era. Below, in Part II, we compare fundraising totals for each candidate and their supportive groups.



Outside Groups Without Contribution Limits Have the Advantage

Approximately 95 percent of outside group fundraising has gone to groups that are not subject to contribution limits. **Of the \$283 million raised by outside groups, \$270 million was collected by groups that can take donations of any amount.** Super PACs and 527s have become the conduit for a [greater and greater share](#) of campaign funding in federal elections since *Citizens United*. In fact, setting aside the distinction between candidates and others, of the total raised for the presidential contest so far by candidates and groups supporting a single candidate, the \$143 million raised by entities subject to contribution limits (campaign committees, traditional PACs, and leadership PACs) is dwarfed by the \$270 million raised by unlimited-contribution groups. **Almost two-thirds of the \$412 million raised for the presidential contest so far has gone to the no-limit groups.**

Even so, candidates are also benefiting from significant amounts raised through shadow campaigns organized as traditional and leadership PACs, which have taken in \$13.4 million this cycle. Donations to these PACs are capped at \$5,000 — significantly higher than the \$2,700 contribution limit for primary campaigns. The significance of leadership PACs in presidential campaigns may be on the rise, possibly because these vehicles can raise and spend money to benefit presidential aspirations before an official candidacy is declared and certain FEC rules take effect. PACs can [fund travel to early primary states and pay staffers](#) who will be hired by the eventual campaign. The money they dole out to other candidates and parties can be used [strategically](#) to court support among local party leaders.

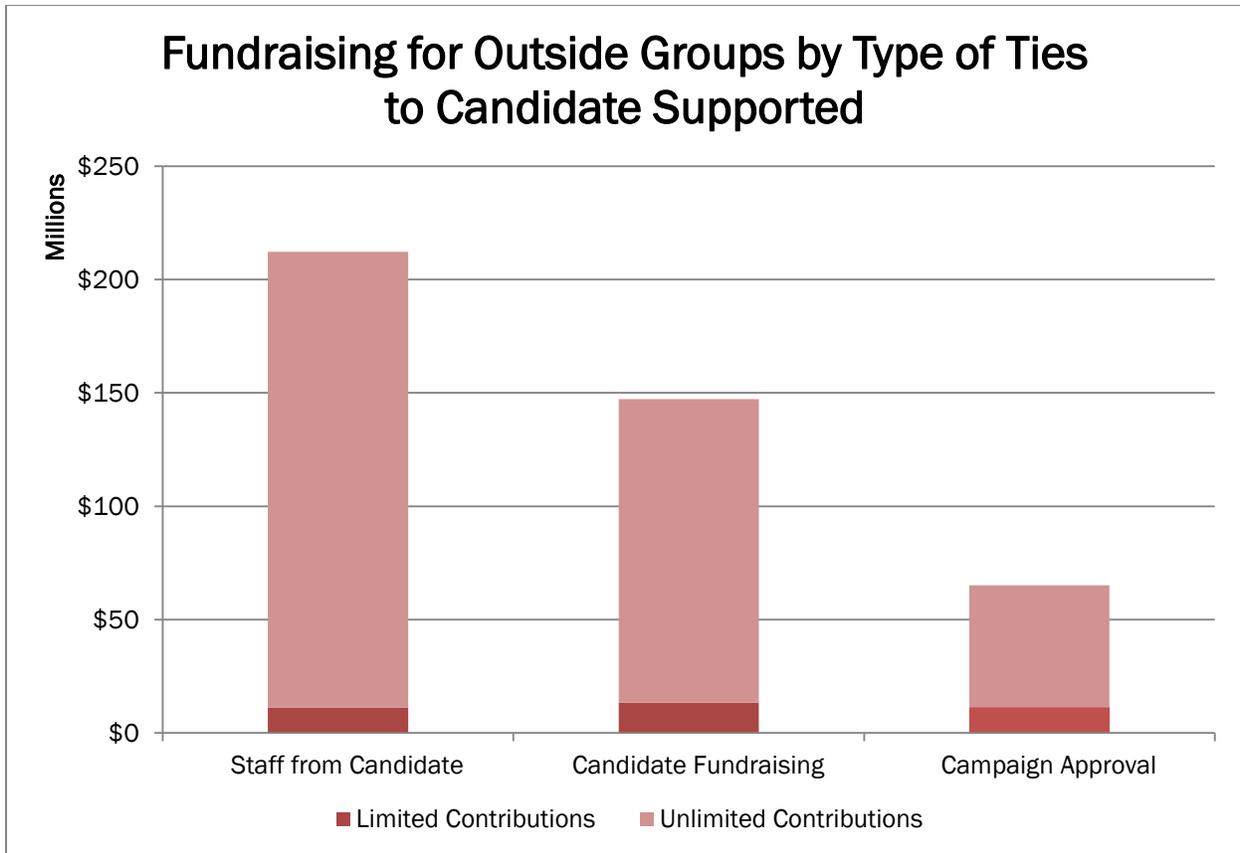
Groups with Ties to a Candidate Attract the Most Money

Shadow campaigns — groups with reported ties to a candidate — account for 96 percent of the outside money raised. **Of the \$283 million raised by groups dedicated to a specific presidential candidate, \$273 million was raised by groups that press reports indicate have ties to the candidate.** These ties potentially blur the line between the official campaign and outside groups.

Indeed, these types of ties appear to be something of a prerequisite to big revenue for candidate-specific groups. **All 10 of the groups that raised \$10 million or more reportedly have connections to their favored candidate,** and of the 28 outside groups that raised more than \$1 million, only four had no reported ties.

A closer look at the major types of ties between candidates and outside groups reveals:

- \$213 million was raised by groups that are reportedly run by or working with former high-level staff of the candidate. This category includes groups that reportedly employ (including working with consultants) at least one person who previously had a high-level position with the candidate either in a prior campaign, political committee, or political office, for example as a campaign manager, finance director, communications aide, or chief of staff.
- \$147 million was raised by groups that the supported candidate reportedly raised funds for. This category includes cases in which the candidate has reportedly personally solicited funds for the group, for example by headlining a fundraiser, meeting with donors, or making an appeal via email or social media.
- \$65 million was raised by groups that reportedly received a public signal of approval by the candidate or a campaign spokesperson, for example by the candidate having served as an executive of the group in the past, the candidate being named honorary chairman or leadership PAC sponsor, the candidate announcing the formation of the group or its hires, the campaign characterizing the group as “unofficially sanctioned,” or the campaign including the group’s revenue in its own fundraising announcements.



Our analysis does not include fundraising by presidential candidates’ committees for other offices, such as Senate reelection campaigns or gubernatorial committees. According to reporting by *The New York Times*, [some candidates may be using funds from other campaigns to pay for presidential bid expenses](#). Like the use of traditional and leadership PACs, this may allow White House hopefuls to spend money before officially declaring. In the case of state campaigns, contribution limits may also be higher than for a federal race. Although we do not count other campaigns’ fundraising here because it is not possible to attribute all or even a known amount to a presidential campaign, this phenomenon appears to be another example of candidates benefiting by funds held by entities other than their presidential campaign committee but over which they exercise control.

Dark-Money Fundraising Remains Unknown

The hundreds of millions in outside group fundraising analyzed here does not include **tens of millions of dollars raised by dark-money groups that are not required to disclose the identities of their donors**. Our rough estimate based on statements by a few of the groups themselves is that dark-money organizations boosting a presidential candidate in this election have raised at least \$30 million in the last three years. Several groups have not declared their revenue at all, so this estimate is likely far lower than the accurate total. These tax-exempt social welfare groups can take contributions of any amount and do not have to report their finances before the election, so both the amount they raise and their donors can remain hidden. When they do announce their revenue to the press, there is no way to independently verify their statements. Our analysis therefore undoubtedly underestimates the true amount of unlimited-contribution money raised by groups with candidate ties.

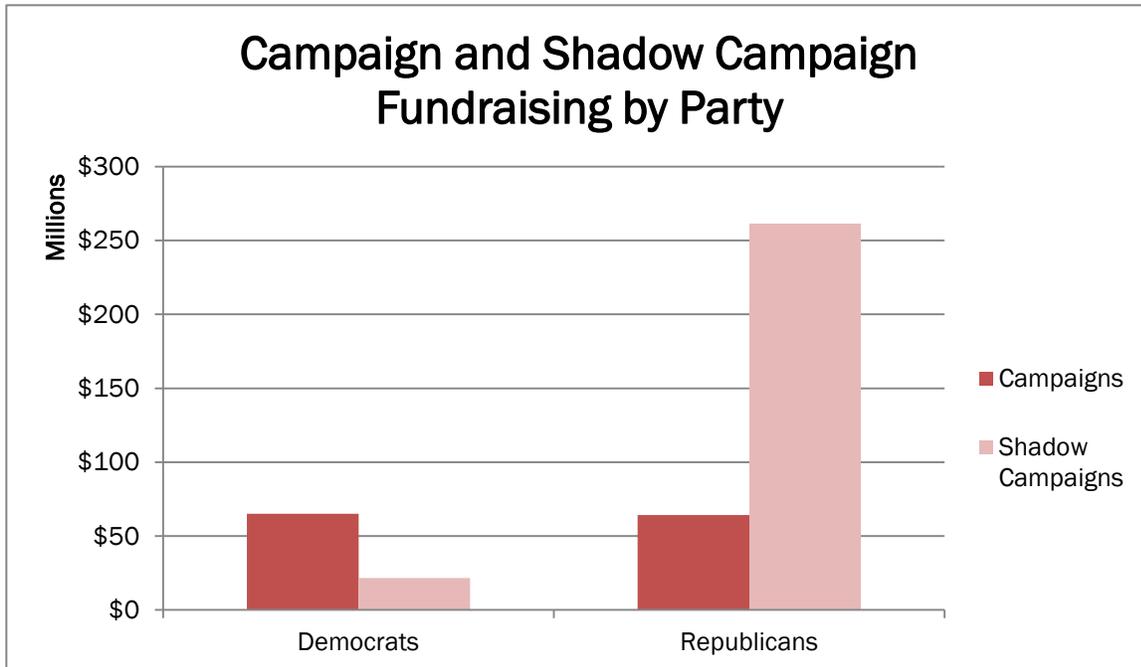
Some Candidates Stand to Benefit More than Others

Below, in Part II, we describe in detail the reported connections between each candidate and their shadow campaigns. The candidate who has benefited the most from the rise of single-candidate groups so far in this cycle is without a doubt former Florida Gov. Jeb Bush: the shadow campaign groups supporting him and benefiting from his fundraising efforts took in \$108.5 million, a record-breaking amount that is almost ten times the \$11.4 million raised by his campaign.

The table below shows the candidates for whom shadow campaigns have raised more than their campaign committees, ranked according to ratio of shadow campaign revenue to total supportive fundraising. For the reasons explained above, neither the numerator nor the denominator here includes either dark money groups or campaigns for other offices like senator or governor. The top four candidates listed, Chris Christie, John Kasich, Scott Walker, and Jim Webb, officially launched their campaigns after the end of the second quarter. So the campaign committees have not yet reported any money raised, even as shadow campaigns for Christie, Kasich, and Walker have collected substantial sums.

Candidate	Campaign & Shadow Campaigns, Combined	Shadow Campaigns	Percent Raised by Shadow Campaigns
1. Scott Walker (R)	\$26,230,304	\$26,230,304	100%
2. Chris Christie (R)	\$14,359,145	\$14,359,145	100%
3. John Kasich (R)	\$11,730,730	\$11,730,730	100%
4. Jim Webb (D)	\$20,577	\$20,577	100%
5. Rick Perry (R)	\$14,985,773	\$13,846,288	92%
6. Jeb Bush (R)	\$119,954,328	\$108,524,430	90%
7. Bobby Jindal (R)	\$5,260,729	\$4,681,971	89%
8. George Pataki (R)	\$1,115,038	\$859,244	77%
9. Ted Cruz (R)	\$52,967,249	\$38,281,223	72%
10. Mike Huckabee (R)	\$6,496,884	\$4,492,421	69%
11. Carly Fiorina (R)	\$5,197,432	\$3,492,728	67%
12. Marco Rubio (R)	\$26,192,650	\$17,315,782	66%

Republicans have generally benefited far more from shadow campaigns than Democrats. Overall, the campaign committees of Democrats tied those of Republicans, with approximately \$65 million for each party. But the Democratic candidates' shadow campaigns have been outraised by a factor of twelve. Much of the difference is driven by the top fundraiser in each party, Jeb Bush and former Secretary of State Hillary Clinton. Bush is head and shoulders above the field in shadow campaign dollars raised, although there are large totals for Sen. Ted Cruz and several others as well. On the Democratic side, Clinton's campaign has raised the most money of any candidate from either party, \$47.5 million. The shadow campaign groups in her corner collected a substantial amount, \$20.3 million, but still less than half the direct contributions to her campaign. The outside groups supporting the three other Democrats have raised relatively little money.



Historical Comparison

This presidential election has already seen an unprecedented level of money raised by outside groups supporting a specific candidate. According to a review of FEC data compiled by the Center for Responsive Politics, the wealthiest single-candidate super PAC in history was Restore Our Future in 2012, which [raised \\$154 million](#) to boost Mitt Romney. Prior to the current election, second place went to Priorities USA Action, then supporting President Obama’s reelection, which raised \$79 million, and third to the super PAC in Newt Gingrich’s corner, Winning Our Future, with \$24 million, also for the 2012 presidential election. Those totals, of course, represent funds raised over the entire election cycle.

Single-candidate outside groups were virtually unheard of at the time of the prior presidential election in 2008, although [some suspect](#) that the 527 founded by Newt Gingrich in 2007, American Solutions for Winning the Future, may have benefitted Gingrich’s exploration of a possible presidential campaign. That group had raised about \$1.3 million by the end of June 2007, according to IRS filings. In between presidential elections, the organization excelled at fundraising; it collected about \$28 million in the 2010 cycle, while Gingrich was active in its operations. But [according](#) to the Center for Public Integrity, its fundraising quickly dried up when Gingrich left for his official presidential campaign.

Up to this point in the 2012 presidential cycle, according to FEC filings, the pro-Romney Restore Our Future reported \$12 million raised. Priorities USA Action, in Obama’s corner, had collected just \$3 million by the end of June. Other single-candidate super PACs that would go on to play a significant role had not yet formed or not yet raised a single cent by the end of the second quarter, like those supporting Gingrich, Jon Huntsman, Rick Perry, and Rick Santorum, although as noted Gingrich may have benefited from tens of millions raised by a 527 he led before declaring his presidential bid. By contrast, as of the end of June this year, eight candidates each stand to benefit from shadow campaigns with more than \$10 million raised.

Ratios between campaign and outside group fundraising also illustrate the unprecedented nature of this cycle’s activity. Some commenters [have argued](#) that the resources of single-candidate super PACs prolonged the candidacies of Santorum and Gingrich in the 2012 Republican primary when fundraising difficulties

would otherwise have forced their campaigns to shut down. But even those campaigns tied or outraised their supportive super PACs. At the end of 2012, Santorum's campaign raised well over twice the haul of the super PAC boosting him, the Red, White, and Blue Fund, and Gingrich's committee had raised about the same amount as Winning Our Future, although again his 527 had raised more. Obama's campaign eventually raised nine times what Priorities USA Action collected, and Romney took in more than three times the total for Restore Our Future (in both cases counting only the candidates' campaign committees, not party committees).

As of June 2011, the super PACs supporting all but one of the candidates just mentioned, as well as Herman Cain and Jon Huntsman, had either nothing in the bank or a tiny percentage of the campaign's haul. Only Restore Our Future stood out, with \$12 million compared to Romney's \$19 million — despite the large sum, the super PAC only held a minority of the combined total. This year, eight of the candidates who declared before the end of June have been significantly outraised by the groups supporting them. Three more candidates who were undeclared in the second quarter and therefore raised no money each saw seven-figure sums raised by shadow campaigns.

It remains to be seen whether the balance of power between campaigns and outside groups in the 2015-2016 election cycle will remain the same as Election Day approaches, or whether campaign committees will make up the difference. The Brennan Center will continue to report on fundraising patterns as future campaign finance filings are released.

Glossary: Organizational Forms Used to Support Candidates

There are several options for organizing support of a campaign distinct from donating to the campaign itself. The groups that figure in presidential candidates' benefiting from outside fundraising are briefly described here. The most important factor is the groups that can take unlimited contributions: super PACs, 527s, and 501(c)(4) nonprofits. But we also note that it is common for candidates to have strong ties to outside groups that are subject to contribution caps: traditional PACs and leadership PACs.

- *Super PACs*: Created in 2010 as result of *Citizen United*, super PACs are not subject to contribution limits, allowing them to raise large amounts of money from a small number of wealthy donors. Super PACs cannot give money directly to candidates, and they are not allowed to coordinate their expenditures with campaigns. They are regulated by the FEC and are required to disclose their finances, including their donors.
- *527s*: A group may register as a political organization with the IRS under section 527 of the tax code. These 527 organizations are also required to register with the FEC (and choose whether to form as a PAC or super PAC) only if they surpass certain threshold amounts of spending on elections. Put another way, all political committees governed by the FEC are 527s, but not all 527s are political committees. A 527 is not subject to contribution limits and can accept checks of any amount. But 527s cannot donate directly to candidates or spend in coordination with them. They are regulated by the IRS and must publicly report their finances, including donors.
- *501(c)(4) organizations*: Decades ago, Congress recognized the formation of tax-exempt groups dedicated to improving the social welfare of their communities in section 501(c)(4) of the tax law. These nonprofits are prohibited from operating for the private benefit of an individual or a group smaller than the community at large. They are permitted to engage in political activities as long as that is not their primary purpose. They can accept unlimited contributions. As corporations, they are banned from making contributions directly to candidates or coordinating expenditures with them. The 501(c)(4) groups are regulated by the IRS and are required to report revenue on a yearly schedule of their choosing, but are not required to publicly disclose the identities of their donors.

- *Traditional PACs:* Political action committees allow individuals to pool resources for political purposes. They are subject to contribution limits of \$5,000 per donor, per year, and cannot accept corporate or union money. They can give directly to candidate committees, but only up to \$5,000 to each committee per year. PACs also have the option of setting up an account that operates as an internal super PAC, accepting unlimited contributions that cannot be donated directly to candidates. PACs that set up these “non-contribution accounts” are called hybrid PACs. Traditional PACs and hybrid PACs are regulated by the FEC and must publicly report finances, including donors’ identities.
- *Leadership PACs:* A leadership PAC is a type of traditional PAC that is sponsored by a federal candidate or officeholder. They are subject to the same limits as other traditional PACs. They are permitted to contribute up to the \$5,000 limit to their sponsor’s campaign, but can benefit the sponsor’s candidacy by paying for expenses like travel and polling. Typically, most leadership PAC money goes to other federal candidates (as with traditional PACs controlled by someone who is planning to be a candidate), a practice which can also benefit a presidential candidacy by securing support. Leadership PACs are regulated by the FEC and must publicly report finances, including their donors’ identities.

Methodology

We relied on a combination of factors to determine the list of outside groups that are dedicated to supporting a specific candidate. We consulted lists compiled by the [Center for Responsive Politics](#) and the [Sunlight Foundation](#) as well as press reports. We included some groups that were founded or formerly led by the candidate or otherwise have close ties to the candidate where the context indicates an intent to support only that candidate, as well as groups whose name indicates support of the candidate and groups that otherwise self-identify as dedicated to supporting the candidate. The identification of groups devoted to a single candidate will necessarily shift over the course of the election cycle. It is now too early to rely on spending patterns, but as expenditures increase over time, that factor will become the primary criterion, except in the case of traditional and leadership PACs, which contribute to other candidates.

Shadow campaigns comprise a subset of the groups supporting a single candidate. In order to be considered a shadow campaign group, an organization must fit into at least one of the categories set out below. These are the categories used in the fundraising breakdowns above, and they are also used in Part II for tables that summarize candidate connections for the major groups supporting each candidate, as reported in the press. Every group we characterize as a “shadow campaign” fits into at least one of these categories.

- *Candidate fundraising:* The candidate has reportedly personally solicited funds for the group, for example by headlining a fundraiser, meeting with donors, or making an appeal via email or social media.
- *Campaign approval:* The candidate or a spokesperson has been reported to publicly signal approval of the group’s efforts, for example by the candidate having served as an executive of the group in the past, the candidate being named as honorary chairman or leadership PAC sponsor, the candidate announcing the formation of the group or its hires, the campaign characterizing the group as “unofficially sanctioned,” or the campaign including the group’s revenue in its own fundraising announcements.

- *Former high-level candidate staff:* The group reportedly employs (including working with consultants) at least one person who had a high-level position with the candidate either in a previous campaign, political committee, or political office, for example as a campaign manager, finance director, communications aide, or chief of staff.
- *Founded by candidate's associates:* The group was reportedly formed by at least one person with connections to the candidate, for example former aides, business associates, or longtime friends. We include individuals listed as treasurer on an FEC statement of organization among those who “founded” a group.
- *Shares vendors with campaign:* The group and the campaign have both been reported to, in the present election cycle, used the services of a vendor that provides services related to campaign strategy, such as communications, polling, or data analysis. None of the groups in our analysis is considered a shadow campaign based on this factor alone.

We collected FEC filings for campaign committees, leadership PACs, and super PACs. We collected IRS filings for 527s. We took fundraising totals for the 2015-2016 election cycle, beginning on January 1, 2015, through the end of the second quarter reporting period on June 30. For those groups that raised significant amounts for the presidential election prior to 2015, we have noted that fact in the discussion of the group but not included it in overall totals.

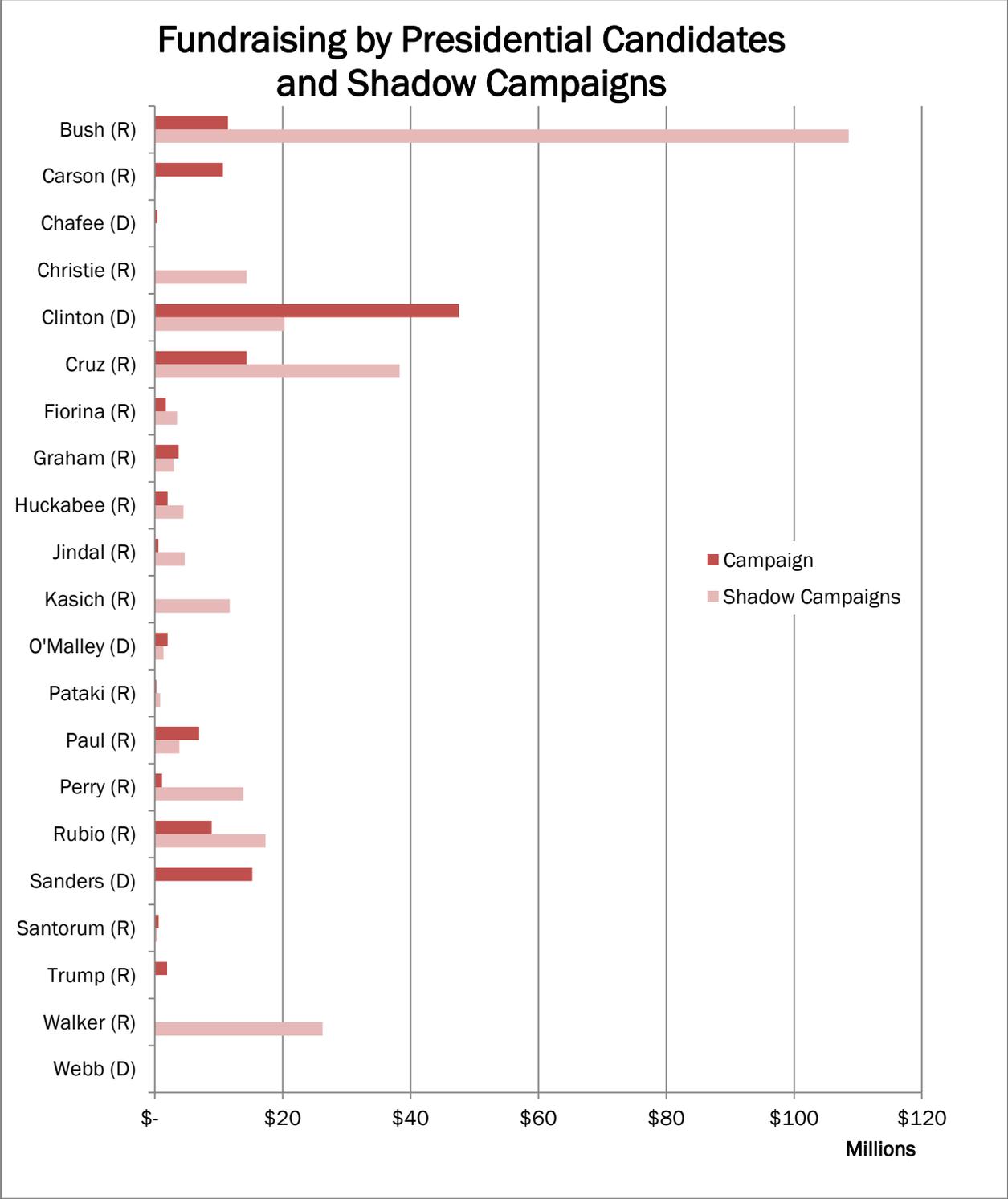
For 501(c)(4) nonprofits, we noted where there are press reports of groups’ fundraising, which are based on the organizations’ own announcements. There is no way to independently verify these figures. Not all of them cover the same time period as the FEC and IRS data we used for other organizations, making direct comparison difficult. And since many nonprofits do not even announce their own fundraising, the numbers we use are likely to substantially understate the amount of dark-money revenue. Because of the problems with this data, we do not count 501(c)(4) money in our overall total of outside group fundraising.

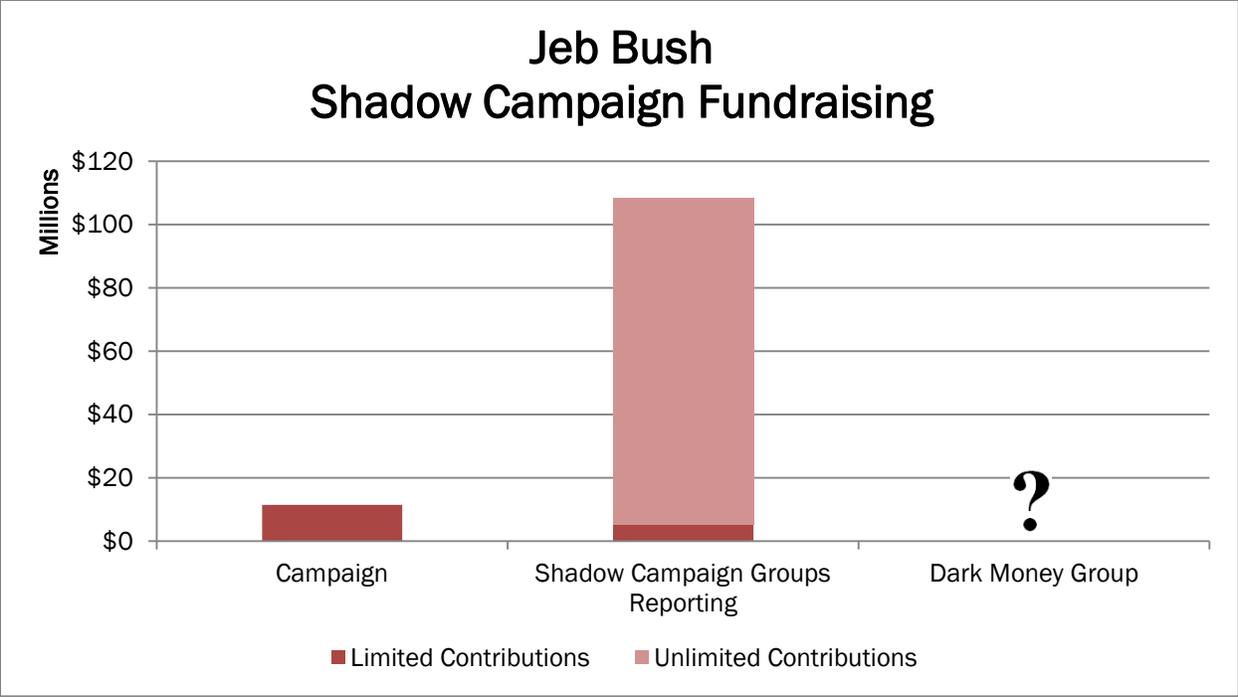
The time period we examine, January 1 to June 30, 2015, leaves out significant fundraising by some groups prior to that period. However, it is the best way to ensure apples-to-apples comparisons among groups, since the majority did not begin fundraising before 2015. In one case, Ready for Hillary, the group’s plan involved raising the great share of its money in the non-presidential cycle of 2013-2014; that group raised \$13 million prior to 2015. That amount is not counted in our totals. Many leadership PACs have been active for years, but prior fundraising cannot be attributed to current presidential campaigns, at least not entirely. The conservative course is to leave prior leadership PAC fundraising out of fundraising totals for groups dedicated to presidential candidates for 2016.

Several presidential campaigns have no supportive outside groups with reported ties to the candidate. They are not discussed in Part II below, although their campaign fundraising is included in the overall comparison of candidate to outside receipts. They are, along with their approximate campaign committee revenue as of the end of the second quarter: Lincoln Chafee (\$400,000), Bernie Sanders (\$15.2 million), Donald Trump (\$1.9 million), and Jim Webb (\$0). Senators Sanders and Webb both have leadership PACs that raised \$16,000 and \$21,000, respectively, which are included in the fundraising totals as outside groups with ties to candidates. Two super PACs have formed in support of Donald Trump, though neither reported raising more than \$200. These are included in the total for outside group fundraising, but not for shadow campaigns.

II. Fundraising by Presidential Candidates and Shadow Campaigns

This part discusses the groups supporting specific presidential candidates in more detail. For each candidate, we profile the outside groups and collect press reports about their ties to the candidate.





Groups Supporting Bush	Organization	Contributions	Fundraising
Jeb 2016	Campaign comm.	Limited	\$11,429,898
Right to Rise PAC	Traditional PAC	Limited	\$5,356,584
Right to Rise USA	Super PAC	Unlimited	\$103,167,845
Right to Rise Policy Solutions	501(c)(4)	Unlimited	Unknown
BHAG LLC	LLC	Unlimited	Unknown

Right to Rise USA

In January, former Florida governor Jeb Bush [announced](#) the formation of a PAC called Right to Rise, which *The Wall Street Journal* [characterized](#) as “a big step” in the direction of a presidential bid. Bush [serves](#) as the group’s “honorary chairman.” The [same day](#) that traditional PAC formed, a super PAC was founded with the same name and a similar website and logo, the *Journal* reported. The groups also share the same founding assistant treasurer, who previously served as [comptroller](#) for Bush’s gubernatorial campaigns.

Right to Rise USA – Reported Ties	
Candidate fundraising	✓
Campaign approval	
Former high-level candidate staff	✓
Founded by candidate’s associates	✓
Sharing vendors with campaign	✓

According to *Bloomberg*, in the five months before officially announcing his candidacy, Bush headlined [at least 39 fundraisers](#) for the super PAC, now called Right to Rise USA, including some with a suggested donation of \$100,000.

The super PAC is [run](#) by Mike Murphy, who has worked for Bush on [multiple campaigns](#) going back to his 1998 bid for governor of Florida. According to the Associated Press, Murphy was “[deeply involved](#)” in Bush’s exploration of a presidential bid until the campaign announcement. [Reporting](#) in *The Washington Post* on arguments within the Bush camp “about how to divvy up money and resources between” the super PAC and the campaign mentioned Murphy’s role in making staffing decisions for the Bush camp. In a call with super PAC donors shortly after Bush officially launched his bid, Murphy explained that he “[can’t coordinate any more’ with the campaign, but said he was well informed as of a week ago](#),” as reported by BuzzFeed. On the call, Murphy predicted that the super

PAC would concentrate on positive advertising, saying, “[One of the new ideas that, you know, the governor had — he’s such an innovator — is we’re going to be the first super PAC to really be able to do just positive advertising.](#)” A Right to Rise spokesman later [said](#) Murphy was referring only to Bush’s “historical preference for positive advertising.” The positive advertising would be aided by footage of the candidate, Murphy noted, [saying](#), “We have some incredible stuff in the can that we shot with the governor.”

Other Bush advisers have [worked with both](#) the traditional PAC and the super PAC, according to *The Washington Post*. One prominent [example](#), Mason J. Fink, signed on to run the super PAC’s national fundraising effort and also helped the traditional PAC with fundraising strategy.

In April, the Associated Press [reported](#) that the Bush team planned to outsource traditional campaign activities like advertising, direct mail, data gathering, and phone banks to the super PAC.

As [reported](#) in *The New York Times*, Bush aides are “considering an ambitious data-selling system that would exist for his eventual presidential campaign and outside groups supporting it.” The “data trust,” as the *Times* called it, could collect information on voters and polls and sell it to the campaign, the super PAC, and other outside groups. The arrangement could allow the various entities “to target voters in a parallel way” without directly sharing information or discussing strategy, the *Times* explained.

Other Pro-Bush Groups

As noted, Bush has a traditional PAC, Right to Rise PAC, which he [announced](#) the creation of and raised funds for before forming his campaign committee. [According](#) to the *Miami Herald*, the PAC is run by “longtime Bush confidant” Sally Bradshaw, who the *Florida Times-Union* [reports](#) is a former campaign manager and gubernatorial chief of staff to Bush.

Right to Rise PAC – Reported Ties	
Candidate fundraising	✓
Campaign approval	✓
Former high-level candidate staff	✓
Founded by candidate’s associates	
Sharing vendors with campaign	

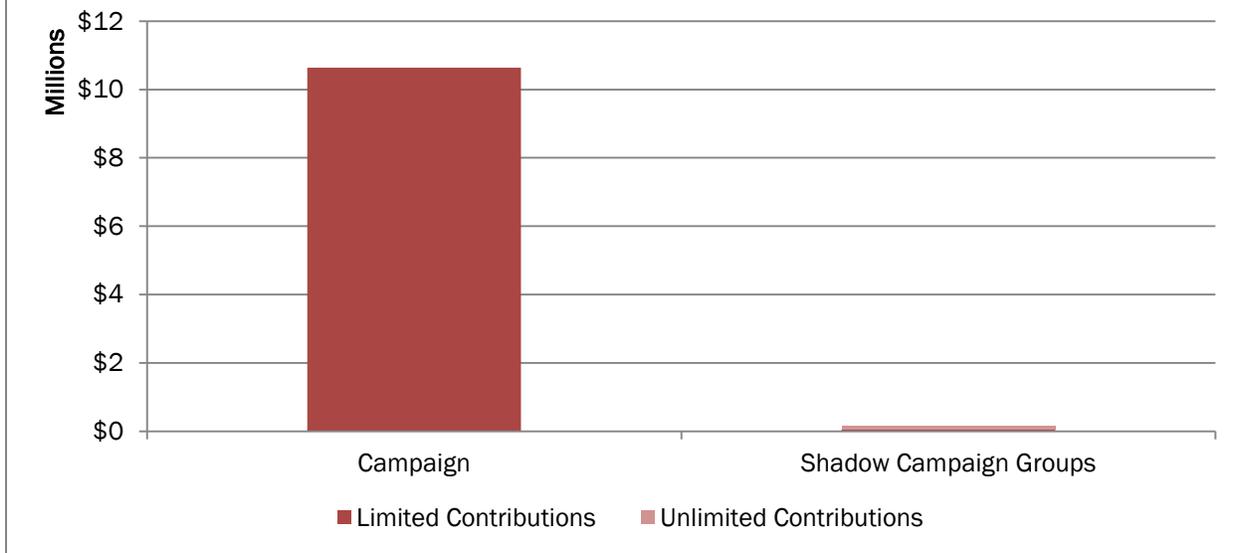
Bush is also supported by a social welfare [nonprofit](#) with a familiar-sounding name, Right to Rise Policy Solutions, according to *The Washington Post*. The 501(c)(4) organization was [founded](#) less than a month after the other “Right to Rise” groups by William Simon, a friend of Bush who has advised Bush on policy and helped identify experts for the campaign to hire, according to the *Post*. *The Wall Street Journal* noted that, although the

campaign has moved to [shut down](#) other advocacy efforts not linked to Bush, Right to Rise Policy Solutions has been left alone. According to [reporting](#) by *The Washington Post*, the Bush team relied on the nonprofit before Bush’s official candidacy began as a means of “housing several top policy advisers who [were] expected to join his eventual campaign.”

The nonprofit’s fundraising total is unknown because the group is not required to report financial information. The identities of its donors, who can legally make unlimited contributions, may be kept secret.

In addition to the groups supporting Bush, there is a company called BHAG LLC, which [owns the trademark to the campaign’s “Jeb!” logo](#), *Mother Jones* has reported. (The logo was previously trademarked by Bush’s gubernatorial campaign.) BHAG’s registration paperwork lists an employee of Jeb Bush & Associates, but little is known about the LLC or its ties to the Bush campaign.

Ben Carson Shadow Campaign Fundraising



Groups Supporting Carson	Organization	Contributions	Fundraising
Carson America	Campaign comm.	Limited	\$10,642,242
USA First PAC	Traditional PAC	Limited	\$60,639
One Vote	Super PAC	Unlimited	\$100,000

One Vote

One Vote – Reported Ties	
Candidate fundraising	
Campaign approval	✓
Former high-level candidate staff	
Founded by candidate’s associates	
Sharing vendors with campaign	

According to retired neurosurgeon Ben Carson’s campaign [spokesman](#), as quoted in *The Washington Post*, One Vote is the “unofficially sanctioned” super PAC to which Carson supporters are asked to “make their excess contributions.” [According](#) to *Politico*, the super PAC is “helmed by Andy Yates,” and his website bio claims One Vote is “[recognized by](#)” the campaign. Yates was quoted in *Politico* saying the group is “[the chosen super PAC of the Ben Carson exploratory committee](#).”

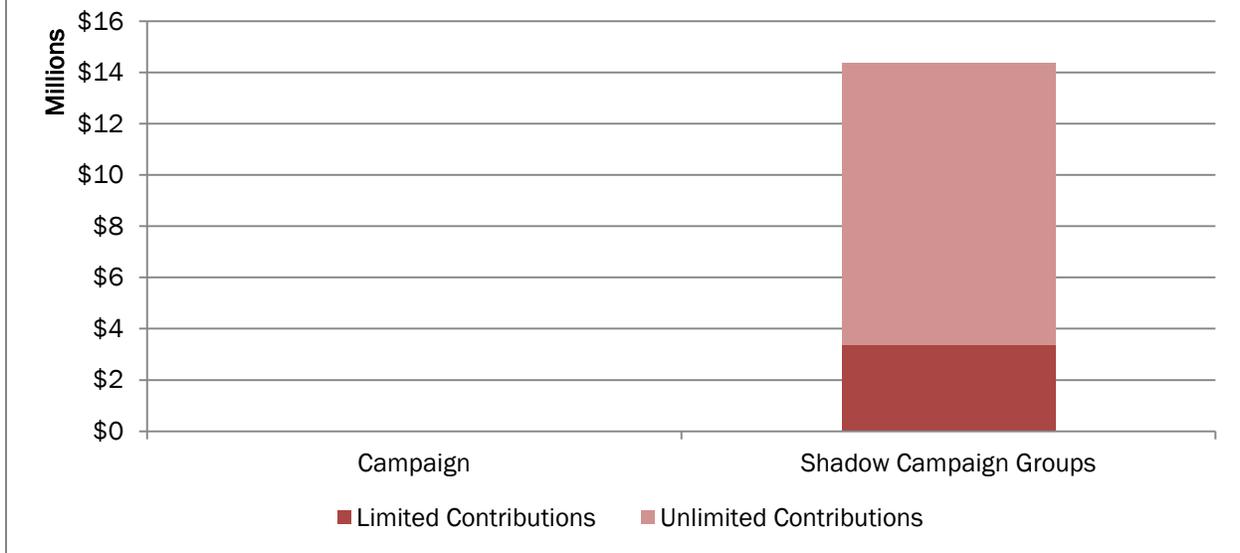
Other Pro-Carson Groups

Carson formed a traditional PAC in 2014 called [USA First PAC](#), telling supporters that it would “lay the groundwork” if he decided to run for president, according to an [account](#) in *The Washington Times*.

Terry Giles, Carson’s campaign manager, resigned in May of this year “[with the intention of forming](#)” a new super PAC to support the candidate, as reported by *The Washington Post*. Giles told the *Post* he plans to convince One Vote and another pro-Carson (but not candidate-connected, according to our criteria) super PAC to shut down so that the outside spending can be coordinated through his new group. Regulations require Giles, as a former campaign staffer, to wait 120 days before working for a super PAC. Giles was quoted in *U.S. News* saying, “[I hired all of the campaign people, and I know exactly what their strategy is, so I can very effectively lead the super PAC.](#)”

There are two other outside groups supporting Carson’s presidential aspirations. They were both called the National Draft Ben Carson Committee and have shared the same treasurer, according to FEC filings, although one changed its name to The 2016 Committee after Carson announced. Combined, they have raised \$6.7 million this cycle. Whatever the reason for the duplication, the committees do not seem to be tied to the Carson campaign. The founders and leaders do not have connections with Carson, and the campaign has distanced itself from the groups, characterizing them as a “[rogue outfit](#)” and complaining that they are [soliciting donations](#) without making clear that the money does not go to Carson.

Chris Christie Shadow Campaign Fundraising



Groups Supporting Christie	Organization	Contributions	Fundraising
Chris Christie for President	Campaign comm.	Limited	\$0
Leadership Matters for America	Traditional PAC	Limited	\$3,355,840
America Leads	Super PAC	Unlimited	\$11,003,305

New Jersey Gov. Chris Christie announced his presidential campaign on June 30, the last day of the second quarter, so his campaign did not have any revenue in this reporting period.

America Leads

America Leads – Reported Ties	
Candidate fundraising	
Campaign approval	
Former high-level candidate staff	✓
Founded by candidate’s associates	
Sharing vendors with campaign	

In February, Phil Cox [founded](#) a super PAC called America Leads. Cox worked for Christie when he chaired the Republican Governors Association (RGA) during the 2014 cycle and will serve as the super PAC’s director, [according](#) to *The Washington Post*. According to *Bloomberg*, he also [serves](#) as a “[senior adviser](#)” for Christie’s traditional PAC, discussed further below. The RGA finance director during Christie tenure there has also

[joined](#) America Leads, as has a digital expert who worked for the candidate’s gubernatorial campaign, reported the *Washington Post*.

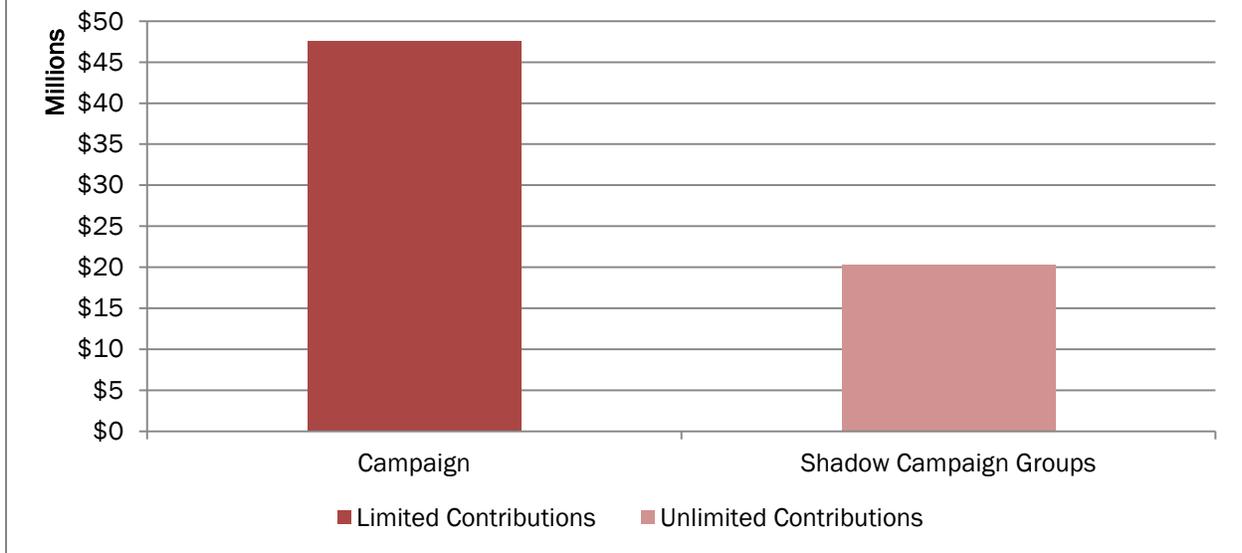
As [reported](#) by NJ Advance Media, America Leads reportedly held a meeting for donors at Philadelphia’s Union League before a fundraising event that Christie headlined for his traditional PAC, Leadership Matters for America.

Other Pro-Christie Groups

As reported in New Jersey's *The Record*, Christie has [raised funds](#) for a traditional PAC, Leadership Matters for America, which formed in January of this year. The group's website names the governor as "[honorary chairman](#)." Since Christie announced his presidential bid, his campaign has [hired](#) staffers away from Leadership Matters for America. As noted above, the head of the pro-Christie super PAC also advises the traditional PAC.

Leadership Matters for America – Reported Ties	
Candidate fundraising	✓
Campaign approval	✓
Former high-level candidate staff	✓
Founded by candidate's associates	
Sharing vendors with campaign	

Hillary Clinton Shadow Campaign Fundraising



Groups Supporting Clinton	Organization	Contributions	Fundraising
Hillary for America	Campaign comm.	Limited	\$47,549,950
Priorities USA Action	Super PAC	Unlimited	\$15,654,457
Correct the Record	Super PAC	Unlimited	\$1,435,098
Ready for Hillary / Ready PAC	Super PAC	Unlimited	\$3,180,593
Potential nonprofit	501(c)(4)	Unlimited	Unknown

Priorities USA Action

Priorities USA Action – Reported Ties	
Candidate fundraising	✓
Campaign approval	
Former high-level candidate staff	✓
Founded by candidate’s associates	
Sharing vendors with campaign	

Priorities USA Action started life as a conduit for outside spending in support of President Obama, and it [spent](#) \$65 million on his reelection in 2012. This election cycle, it has been [reconfigured](#) to boost former Secretary of State Hillary Clinton’s presidential aspirations. Guy Cecil, the [political director](#) of Clinton’s 2008 presidential campaign, is the super PAC’s [chief strategist](#), according to *The Washington Post*. Press reports note several others

with Clinton ties working with Priorities USA: Longtime Clinton ally [Harold Ickes](#) and former Clinton aide [Sean Sweeney](#) are also working with the super PAC. Clinton’s [critic-turned-supporter David Brock](#) is on the board of Priorities USA, and Clinton’s 2008 pollster [Geoff Garin](#) and 2008 finance director [Jonathan Mantz](#) will work for the super PAC as well.

The Wall Street Journal quoted a source as saying, “[We always needed a close Clinton person, so her donors knew she cared and was connected.](#)” *The Washington Post* reported that Clinton advisers wanted Priorities USA to be led by someone who could “[anticipate the needs of the campaign.](#)” As Cecil put it, quoted by the *National Journal*, donors “[would know the \[Clinton\] imprimatur had been received.](#)”

Clinton has [met with potential donors](#) for Priorities USA, according to the *Los Angeles Times*. The *National Journal* reported that [three donors gave six- and seven-figure donations](#) to the super PAC after Clinton spoke at a fundraiser.

Correct the Record

Correct the Record – Reported Ties	
Candidate fundraising	
Campaign approval	
Former high-level candidate staff	✓
Founded by candidate’s associates	✓
Sharing vendors with campaign	

In May, the Democratic opposition research super PAC American Bridge [spun off](#) a stand-alone super PAC to focus on responding to attacks on Clinton called Correct the Record. The spinoff was founded by Clinton ally David Brock, who is also involved with various other [pro-Clinton groups](#), including Priorities USA Action, as noted by the *Los Angeles Times*. Correct the Record leader [Burns Strider](#) was director of faith outreach for Clinton’s 2008

campaign. *Bloomberg* reports that the group is [represented](#) by the law firm that employs Marc Elias, the Clinton campaign’s general counsel. Clinton hired away the super PAC’s [communications director](#) in March.

Correct the Record has made super PAC history by proclaiming that it will “[work in coordination](#)” with the Clinton campaign, as reported by *The Washington Post*. The group contends that its plans to consult with the Clinton camp on content is legal because the information will be [disseminated](#) on the web and through social media rather than paid media, placing it under an exemption to the ban on candidates coordinating with outside groups, according to a Correct the Record spokeswoman quoted in *The New York Times*. In May, Clinton’s campaign [paid](#) Correct the Record more than a quarter of a million dollars for “research,” as reflected in FEC filings.

Ready for Hillary / Ready PAC

Ready for Hillary – Reported Ties	
Candidate fundraising	
Campaign approval	
Former high-level candidate staff	✓
Founded by candidate’s associates	✓
Sharing vendors with campaign	

In early 2013, Clinton supporters formed the super PAC Ready for Hillary “to build grassroots support for a Clinton candidacy,” as [reported](#) by *USA Today*. After Clinton announced, the group [changed its name](#) to Ready PAC and began to shut down. According to press reports, the group was co-founded by Adam Parkhomenko, who has worked for Clinton’s [leadership PAC](#) and [past campaigns](#). Clinton’s [2008 finance director](#) worked for

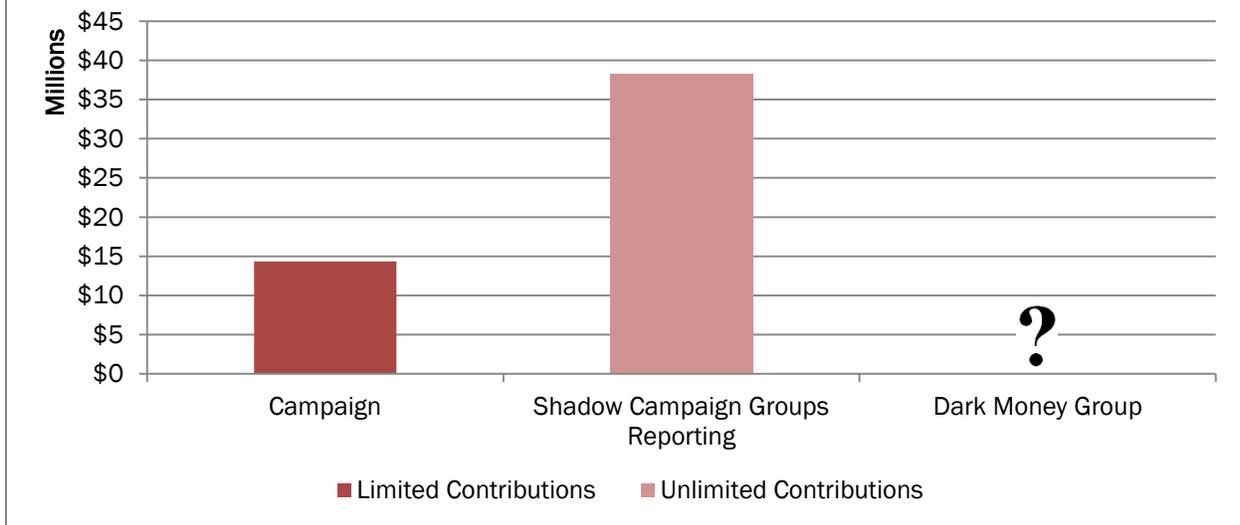
Ready for Hillary, as did [top aides](#) from the Bill Clinton White House, including [Harold Ickes](#). At least six Ready for Hillary staffers, including Parkhomenko, have been [hired](#) by Clinton’s 2016 campaign, notes *Politico*. Ready for Hillary’s “primary purpose” was amassing a list of four million Clinton supporters and their contact information, *Politico* [reported](#). In May, the candidate acquired that list through a list swap, which *Politico* predicted will “bolster” the campaign’s organizing and fundraising.

This analysis only covers fundraising for the 2015-16 election cycle, but Ready for Hillary was most active in the prior cycle. FEC filings show that, in 2013-14, the group raised \$13 million, which is not reflected in the totals reported here.

Other Pro-Clinton Groups

The New York Times [reports](#) that Clinton’s supporters are “considering raising money through a nonprofit affiliated with Priorities USA Action.” If they do, the amount and sources of that money can be kept secret. In the 2012 election, Priorities USA Action [was affiliated with a nonprofit](#) that has since been disbanded. Clinton’s Senate leadership PAC, HillPAC, shut down in 2009.

Ted Cruz Shadow Campaign Fundraising



Groups Supporting Cruz	Organization	Contributions	Fundraising
Cruz for President	Campaign comm.	Limited	\$14,349,161
Jobs, Growth, and Freedom Fund	Leadership PAC	Limited	\$196,601
Keep the Promise PAC	Super PAC	Unlimited	\$1,826,500
Keep the Promise I	Super PAC	Unlimited	\$11,007,096
Keep the Promise II	Super PAC	Unlimited	\$10,000,000
Keep the Promise III	Super PAC	Unlimited	\$15,000,000
Stand for Principle PAC	Super PAC	Unlimited	\$251,026
Unknown nonprofit	501(c)(4)	Unlimited	Unknown

Keep the Promise Network

Keep the Promise Network – Reported Ties	
Candidate fundraising	
Campaign approval	✓
Former high-level candidate staff	
Founded by candidate’s associates	✓
Sharing vendors with campaign	?

In early April, two weeks after Texas Sen. Ted Cruz announced his presidential run, four super PACs were [formed](#) with variations on the name “Keep the Promise,” according to *The New York Times*. FEC filings show that Dathan Voelter is the treasurer for Keep the Promise PAC and Keep the Promise II and III. Voelter has long been a “[friend and financial backer](#)” of Ted Cruz, *Bloomberg*

reported. The remaining group, Keep the Promise I, lists Jacquelyn James as treasurer on an FEC form. *The New York Times* reported that James is an [accountant](#) for the foundation of [major political donors](#) Robert and Rebekah Mercer.

Voelter was quoted in Yahoo Politics saying that although the four groups will each be driven by different donors, they will “[operate as a single team](#).” Little is known about the super PACs’ staff or activities, but the *Dallas Morning News* has identified David Panton as the one who will “[oversee](#)” the Keep the Promise network. Yahoo Politics [reported](#) that Cruz and Panton were college roommates and more recently partners in a Caribbean holding company. Panton told Yahoo that he speaks to the candidate frequently, but they do not discuss campaign strategy.

The Cruz campaign added the super PAC money to its own fundraising in a [statement](#) obtained by CNN that said: “The aggregate total of over \$51 million means that, along with Cruz’s strong support from the conservative grassroots across the country, Cruz’s campaign will have the resources, the manpower, and the energy to compete vigorously” Cruz himself made note the super PAC money; he was quoted by the *Washington Times* in June [saying](#), “Right now, between our campaign and the super PAC, we’ve raised over \$40 million, we have shattered records.”

Politico has reported that the Cruz campaign has [contracted](#) with a company called Cambridge Analytica for data services. According to *Politico*, Cambridge is owned in part by the Mercers, who have been [reported](#) by *The New York Times* to have ties to Keep the Promise I. Cambridge has “had talks with at least one of [the pro-Cruz] super PACs,” *Politico* reported. Most of Cambridge’s prior political work has been done for campaigns the Mercers have donated to, [according](#) to *Politico*, including Cruz’s leadership PAC.

The Keep the Promise network issued a [press release obtained by Reuters](#) in June “calling upon the Senator’s campaign to make a library of creative available to the public for free on its website” so that the super PAC could hold a contest with “grass roots supporters” creating ads and Keep the Promise “airing the most inspiring messages on television, radio and online.” In July, BuzzFeed reported that the campaign [posted hours’ worth of videos](#) to YouTube showing long interviews with his family. Days later, Keep the Promise [posted](#) on its website a 51-page strategy document that included poll results and detailed a plan to start a positive campaign in early-primary states around the time of the first Republican debate, according to CNN.

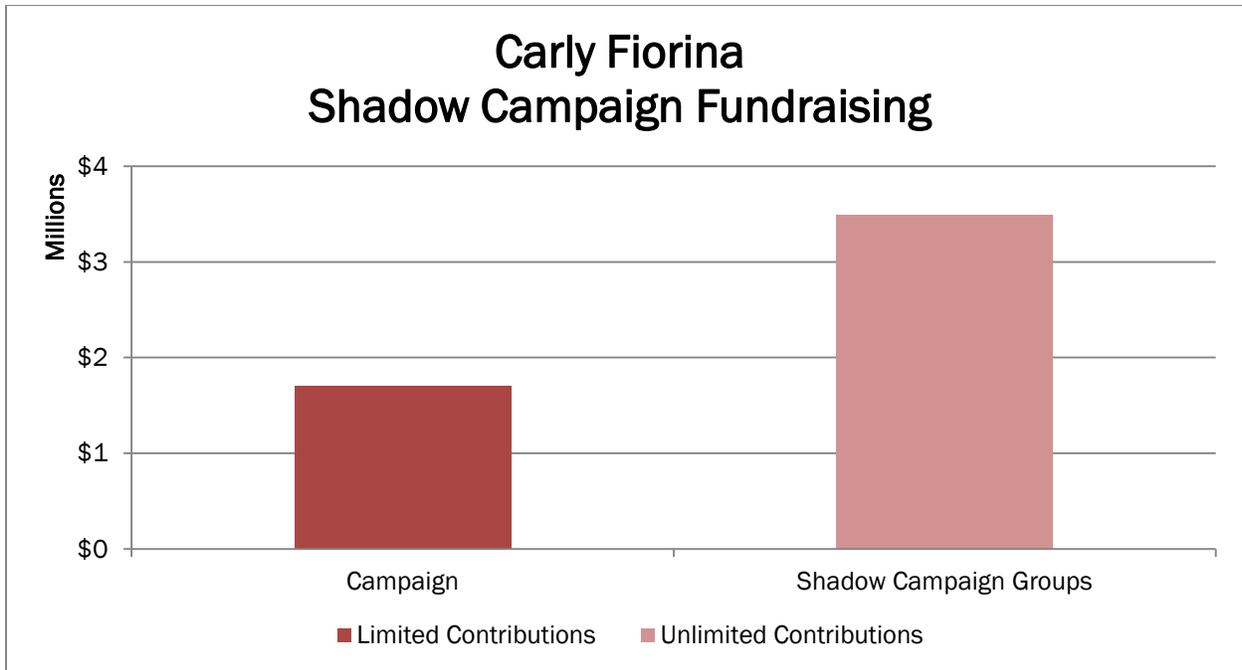
Other Pro-Cruz Groups

Jobs, Growth, and Freedom Fund – Reported Ties	
Candidate fundraising	✓
Campaign approval	✓
Former high-level candidate staff	
Founded by candidate’s associates	
Sharing vendors with campaign	

Ted Cruz formed a leadership PAC, the Jobs, Growth, and Freedom Fund, within days of his election to the Senate in 2012, FEC filings show. He began raising money for it not long after, [according](#) to the Sunlight Foundation.

In 2014, David Panton, who “[oversees](#)” the Keep the Promise network, was involved with [another pro-Cruz super PAC](#), Stand for Principle, according to the *National Review*.

A leader of the Keep the Promise network [told](#) CNN that “Cruz allies ha[ve] created a political nonprofit group, organized under section 501(c)(4)” that “will focus solely on issue advocacy.” Virtually nothing about this group is known. CNN’s source said the nonprofit’s budget is small compared to the super PACs, but there is no specific fundraising — or even identifying — information available.



Groups Supporting Fiorina	Organization	Contributions	Fundraising
Carly for President	Campaign comm.	Limited	\$1,704,704
CARLY for America	Super PAC	Unlimited	\$3,458,670
Unlocking Potential Project	Super PAC	Unlimited	\$34,057

CARLY for America

CARLY for America – Reported Ties	
Candidate fundraising	
Campaign approval	
Former high-level candidate staff	✓
Founded by candidate’s associates	
Sharing vendors with campaign	

In February, McClatchy reported that supporters of former business executive Carly Fiorina [created](#) a super PAC called Carly for America. But when Fiorina launched her campaign in April, *The Wall Street Journal* [reported](#) that the FEC demanded a name change, since rules prohibit legally independent groups from using a candidate’s name in their own. So the super PAC is now registered as Conservative, Authentic, Responsive Leadership for You

and for America, although it goes by the acronym CARLY for America. The group kept the same website and logo, the *Journal* noted. Fiorina’s campaign committee is called Carly for President.

The super PAC’s executive director is Steve DeMaura, who according to the group’s website previously [worked for Fiorina](#) in her role leading [Unlocking Potential](#), a PAC *The Washington Post* described as dedicated to “engaging women” and “closing the gender gap for the GOP.” CARLY for America’s Iowa director also served as political director and state director for Fiorina’s Unlocking Potential Project, [according](#) to the *Iowa Republican*.

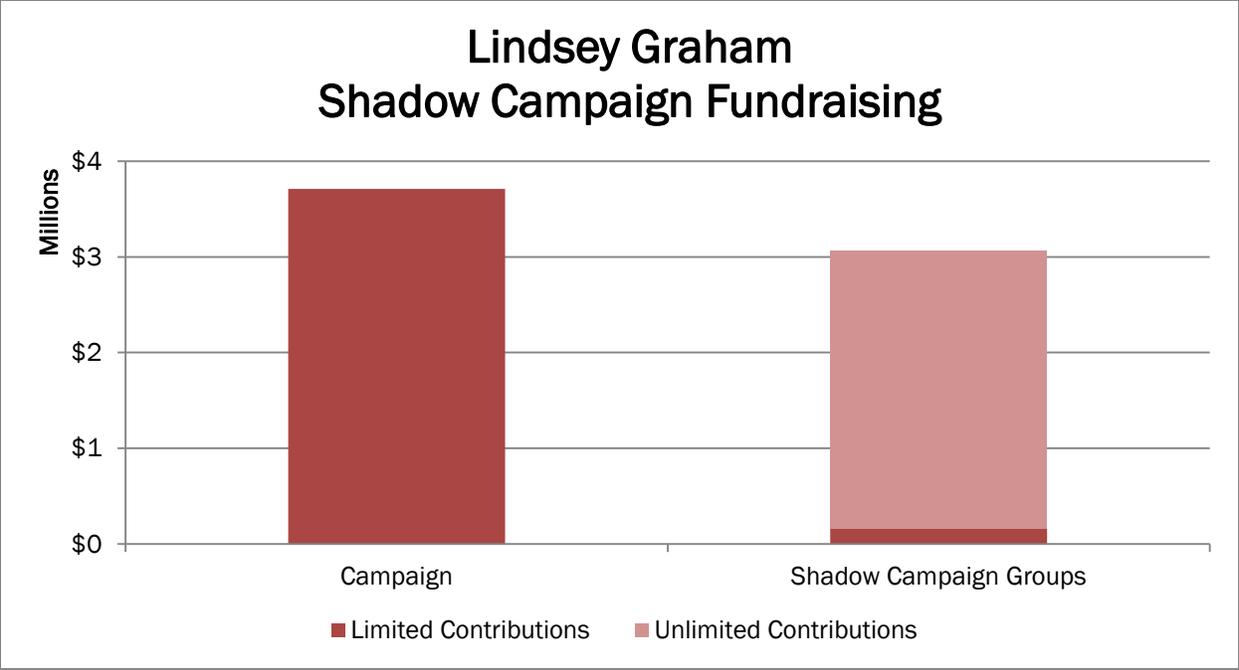
DeMaura [told](#) *The Wall Street Journal* the super PAC will “function as an auxiliary to the official campaign, not just as a mechanism to air negative TV ads.” DeMaura was also [quoted](#) in the *Journal* saying, “I would think that if the campaign read about our approach in *The Wall Street Journal* then they wouldn’t want to duplicate efforts.”

National Journal reported that [the campaign referred a press inquiry to the super PAC](#), and that the group has been securing and announcing endorsements, doing advance work at campaign events, and handling rapid response. Fiorina’s campaign emailed its supporters a link to and embedded on its website a video made by the super PAC, *National Journal* noted. An account in *The Wall Street Journal* also described the traditional [campaign activities](#) that CARLY for America has taken on.

Other Pro-Fiorina Groups

As mentioned above, Fiorina [heads](#) the Unlocking Potential PAC, which made independent expenditures in a handful of Senate contests in 2014, according to [data](#) gathered by the Center for Responsive Politics.

Unlocking Potential PAC – Reported Ties	
Candidate fundraising	
Campaign approval	✓
Former high-level candidate staff	
Founded by candidate’s associates	
Sharing vendors with campaign	



Groups Supporting Graham	Organization	Contributions	Fundraising
Lindsey Graham 2016	Campaign comm.	Limited	\$3,709,553
Fund for America’s Future	Leadership PAC	Limited	\$159,744
Security Is Strength	Super PAC	Unlimited	\$2,897,435

Security Is Strength

Security Is Strength – Reported Ties	
Candidate fundraising	
Campaign approval	
Former high-level candidate staff	✓
Founded by candidate’s associates	✓
Sharing vendors with campaign	

A few days before South Carolina Sen. Lindsey Graham announced his White House bid, *National Journal* [reported](#) that Graham “[a]llies” formed a super PAC called Security Is Strength, an obvious reference to the name of Graham’s [exploratory committee](#), Security Through Strength. The super PAC is led by Andrew King, once Graham’s deputy chief of staff in the Senate, and Caroline

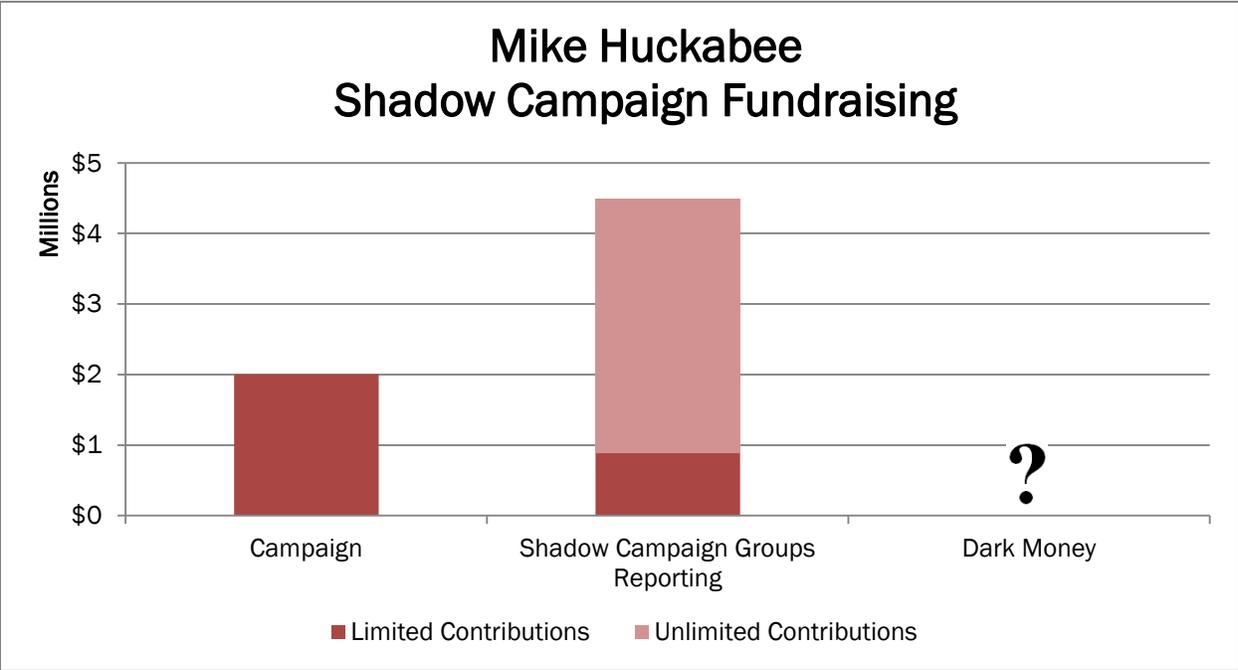
Wren, finance director for Graham’s 2014 Senate campaign, according to *National Journal*. Business executive Scott Ford serves as a [co-chairman of the super PAC](#), according to *Politico*. Ford is also a member of the official [Graham campaign’s national finance committee](#), reports South Carolina’s *The State*.

Other Pro-Graham Groups

Graham used a 527 called Security Through Strength as his exploratory committee. Although there are no contribution limits on 527s, exploratory committees are retroactively subject to candidate limits once the candidate officially announces. In accord with this rule, IRS filings show that Security Through Strength only accepted contributions of \$2,700 or less, with the exception of a transfer from Graham’s Senate committee. Funds raised by the exploratory committee are reported as revenue by the campaign committee, so we have not separately counted Security Through Strength’s receipts.

FEC filings show that Sen. Graham has had a leadership PAC, Fund for America's Future, since 2003. [According](#) to *The Wall Street Journal*, Graham has raised money for the leadership PAC since announcing his presidential bid.

Fund for America's Future – Reported Ties	
Candidate fundraising	✓
Campaign approval	✓
Former high-level candidate staff	
Founded by candidate's associates	
Sharing vendors with campaign	



Groups Supporting Huckabee	Organization	Contributions	Fundraising
Huckabee for President	Campaign comm.	Limited	\$2,004,463
Huck PAC	Traditional PAC	Limited	\$887,433
Pursuing America’s Greatness	Super PAC	Unlimited	\$3,604,987
America Takes Action	501(c)(4)	Unlimited	\$2.4 million in unknown time frame

Pursuing America’s Greatness

Pursuing America’s Greatness – Reported Ties	
Candidate fundraising	
Campaign approval	✓
Former high-level candidate staff	
Founded by candidate’s associates	✓
Sharing vendors with campaign	

The treasurer for former Arkansas Gov. Mike Huckabee’s Huck PAC [formed](#) a super PAC, Pursuing America’s Greatness, in March, as reported by *USA Today*, although the leadership of the super PAC has not worked for Huckabee, according to press reports. *The Washington Post* pointed out that the former governor set off some speculation about

whether he was soliciting funds for an unlimited contribution group like the super PAC in May when he joked, [“Now, rest assured, if you want to give a million dollars, please do it.”](#) But the candidate has not been reported to raise funds for Pursuing America’s Greatness.

The campaign took note of money raised by the super PAC when [announcing](#) its own fundraising in July, according to an email quoted in *The Washington Post*.

Other Pro-Huckabee Groups

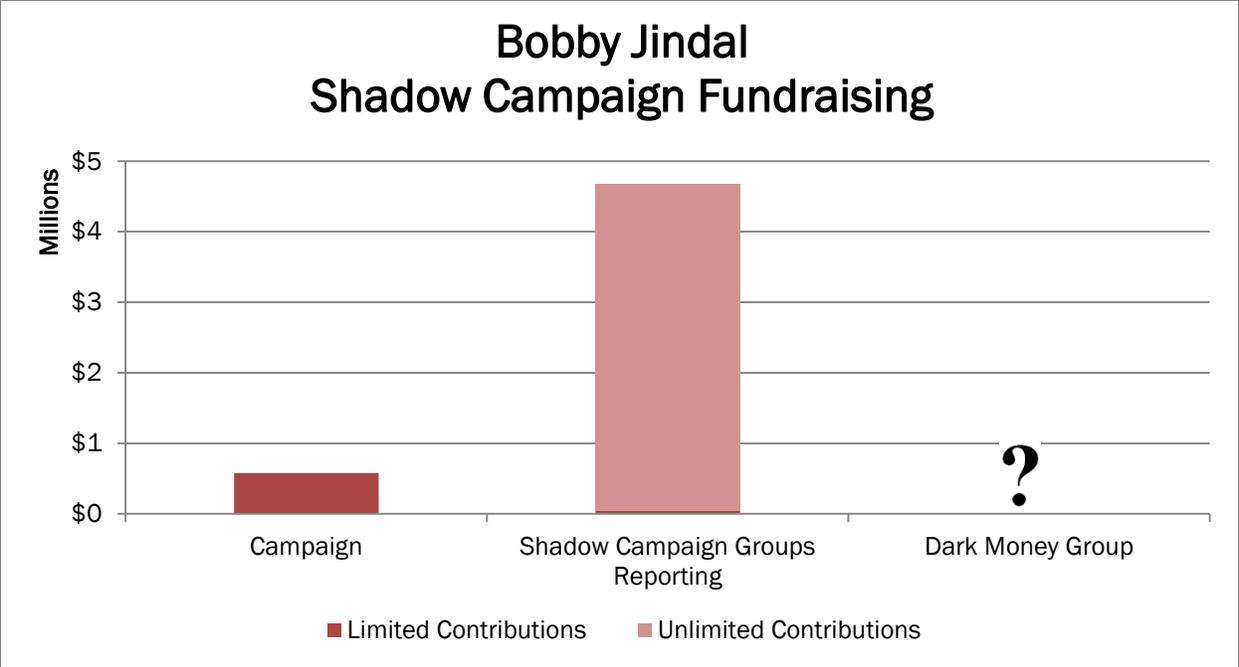
Huck PAC – Reported Ties	
Candidate fundraising	✓
Campaign approval	✓
Former high-level candidate staff	✓
Founded by candidate’s associates	
Sharing vendors with campaign	

The traditional PAC Huck PAC was created in 2008 after the former governor ended his presidential bid, FEC filings show. The group’s [website](#) features a statement from Huckabee about why he “founded Huck PAC.” The former governor has solicited donations for Huck PAC, [according](#) to the *International Business Times*. *The Washington Post* reported it is [run](#) by a “Huckabee aide,” Chad Gallagher, whose consulting firm [bio](#) notes past work for

Huckabee’s gubernatorial administration and past presidential bid.

A 501(c)(4), America Takes Action, was serving as an “[employment perch for his political team](#)” before Huckabee’s bid officially began, according to *The Washington Post*. The group’s [website](#) features photos of Huckabee. CNN [quoted](#) “a senior Huckabee advisor” saying that Pursuing America’s Greatness and America Takes Action together raised about \$6 million, although it is unclear what period of time this figure covers. Subtracting the super PAC’s reported \$3.6 million from that figure yields an estimate of about \$2.4 million raised by America Takes Action. This estimate is not included in the bar graph above because the time frame is unknown.

In March, a 527 called Prosperity for All Fund was formed, which the *Arkansas Times* [noted](#) had “familiar Huckabee family and friends as directors.” The group released a [video](#) featuring Huckabee just before he announced, and a few days later, according to IRS filings, it changed its name to Huckabee for President, becoming the official campaign committee.



Groups Supporting Jindal	Organization	Contributions	Fundraising
Jindal for President	Campaign comm.	Limited	\$578,759
Believe Again PAC	Traditional PAC	Limited	\$44,618
Believe Again	Super PAC	Unlimited	\$3,685,918
American Future Project	527	Unlimited	\$951,434
America Next	501(c)(4)	Unlimited	\$4 million since 2013

The groups supporting Louisiana Gov. Bobby Jindal are reportedly run by a dizzyingly interconnected web of operatives. Staffers frequently work for more than one of these groups simultaneously and move from one entity to another, including several who moved from the governor’s office to outside groups and then, once Jindal announced, to the campaign committee.

Believe Again

Believe Again – Reported Ties	
Candidate fundraising	
Campaign approval	
Former high-level candidate staff	✓
Founded by candidate’s associates	✓
Sharing vendors with campaign	

FEC filings show that the founding treasurer of the Believe Again super PAC is Rolfe McCollister, who [worked](#) for the candidate’s gubernatorial campaign and transition team, as reported by the *Baton Rouge Business Report*. The Associated Press has reported that McCollister is also tied to a [nonprofit](#) that “buys advertising to promote Jindal’s agenda,” and the Louisiana governor appointed McCollister the board of Louisiana State

University. A few weeks after McCollister created the Believe Again super PAC, *Politico* reported that Jindal’s [traditional PAC changed its name to match](#), from Stand Up to Washington to Believe Again PAC. McCollister is also the treasurer of the traditional PAC according to FEC filings. MSNBC described the “lead consultant” to the super PAC, Brad Todd, as a “[longtime campaign consultant for](#)” Jindal. *The New York Times* reported that Todd is also a [consultant for the other outside groups](#) backing the Louisiana governor. According to *The Wall Street Journal*, retired Congressman Bob Livingston [chairs](#) the super PAC; Jindal interned for Livingston in college.

Gov. Jindal has [appeared](#) at town-hall events in Iowa that were hosted by the super PAC, as reported by the *Des Moines Register*.

American Future Project

American Future Project – Reported Ties	
Candidate fundraising	
Campaign approval	
Former high-level candidate staff	✓
Founded by candidate’s associates	✓
Sharing vendors with campaign	

The American Future Project is registered with the IRS as a political organization under section 527 of the tax code, but it has not registered with the FEC. Documents filed with the IRS list Blaise Hazelwood as a contact for the group; [according](#) to *Bloomberg*, Hazelwood is a “longtime adviser” to Jindal and “has joined his allied super PAC.”

The Center for Responsive Politics listed Timmy Teepell as a [chief political advisor](#) to American Future Project; he has also [served](#) as Jindal’s chief of staff and then campaign manager, according to *Politico*. The *Des Moines Register* reports that the 527 shares an “[advisor](#),” Gail Gitcho, with the Believe Again super PAC. According to the *Register*, Gitcho said that American Future Project had hired [staffers](#) who “will both leave their current jobs in the governor’s office, move to Iowa, and will slide into national campaign roles for Jindal if he runs.” The *Times-Picayune* [reported](#) that Gitcho is now a “senior advisor” for the campaign.

Believe Again PAC

Believe Again PAC – Reported Ties	
Candidate fundraising	✓
Campaign approval	
Former high-level candidate staff	✓
Founded by candidate’s associates	
Sharing vendors with campaign	

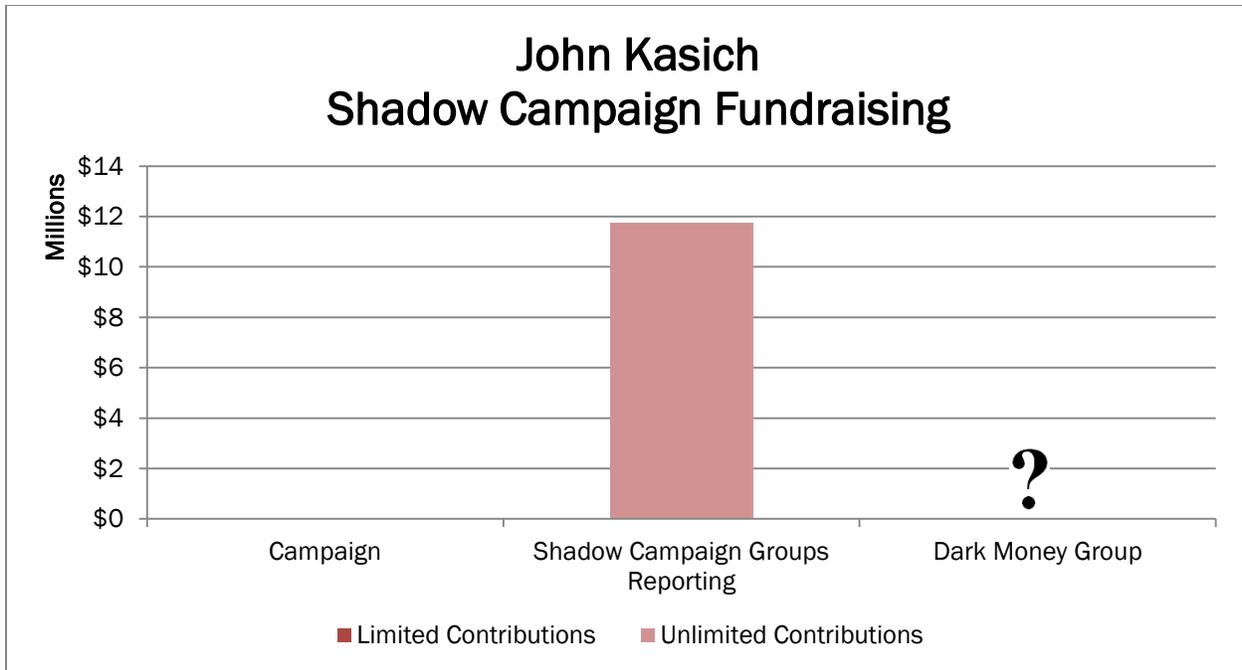
As noted above, Jindal has a traditional PAC, which was rebranded to have the same name as the super PAC. Its staff has included McCollister (also connected to the super PAC and the 501(c)(4)) and Neunaber (also employed by the 501(c)(4) and “expected to join Jindal’s team in Iowa” [according](#) to the *Times-Picayune*). Jindal has solicited funds for the PAC, when it was still called Stand Up to Washington, [according](#) to Louisiana’s the *Advocate*.

America Next

A 501(c)(4) founded in 2013 called America Next lists Jindal as the nonprofit’s “[honorary chairman](#),” according to the *Advocate* in Louisiana. The *Advocate* also reports that America Next’s [board](#) includes McCollister, whose connections to the pro-Jindal PAC and super PAC are mentioned above, as well as the governor’s former executive counsel. The executive director of Jindal’s traditional PAC, Jill Neunaber, “runs [America Next]’s day-to-day operations,” [according](#) to *Politico*. The *Advocate* [reported](#) in July that the leader of national fundraising for America Next “is expected to transition to the Jindal campaign once it’s official.”

Curt Anderson, who *Politico* [notes](#) “has worked on all of Jindal’s campaigns since his first governor’s race in 2003,” was a spokesman for America Next, as [quoted](#) in the *Weekly Standard*. Anderson later became the campaign’s “[chief strategist](#),” according to the *Times-Picayune*. Anderson’s media firm also employs Timmy Teepell, Jindal’s [campaign manager](#) and former chief of staff to the governor, and a pollster connected to Jindal, Wes Anderson, as reported by the *Times-Picayune*.

[According](#) to *Politico*, America Next “provided Jindal with a platform to travel the country, build relationships with donors and generate headlines.” It has [announced](#) raising \$4 million since 2013. This figure is not included in the chart above to avoid a misleading comparison between amounts raised over different time periods.



Groups Supporting Kasich	Organization	Contributions	Fundraising
Kasich for America	Campaign comm.	Limited	\$0
New Day for America	527	Unlimited	\$11,130,730
New Day Independent Media Comm.	527	Unlimited	\$600,000
Balanced Budget Forever	501(c)(4)	Unlimited	Unknown

Ohio Gov. John Kasich officially launched his presidential campaign in July, after the end of the second-quarter reporting period, so his campaign has not reported any receipts yet.

New Day for America

New Day for America – Reported Ties	
Candidate fundraising	✓
Campaign approval	✓
Former high-level candidate staff	✓
Founded by candidate’s associates	
Sharing vendors with campaign	

In April, Gov. Kasich formed a 527 group called New Day for America. Kasich appears in videos on the group’s [websites](#), saying in one: “[I’m announcing that we’ve created the New Day for America committee.](#)” According *Bloomberg* in June, “[Kasich’s senior advisers are still sorting out who else should be placed at \[New Day for America\] and who should work for the campaign.](#)”

The group is run by Matt Carle, who [ran Kasich’s 2014 gubernatorial campaign](#), according to the *Columbus Dispatch*.

New Day for America “[paid for Kasich’s out-of-state travels as he prepares a White House bid,](#)” reported Cleveland’s *Plain Dealer*. The group has made [\\$1.7 million](#) in ad buys aimed at the early primary state of New Hampshire, which sources [told Bloomberg](#) are “part of a whirlwind of planned activities” including the governor’s announcement in late July. *Bloomberg* [reported](#) that, when asked about the buy, “Kasich said the ad is ‘a good reflection of who I am’ and that now is a good time to air it.”

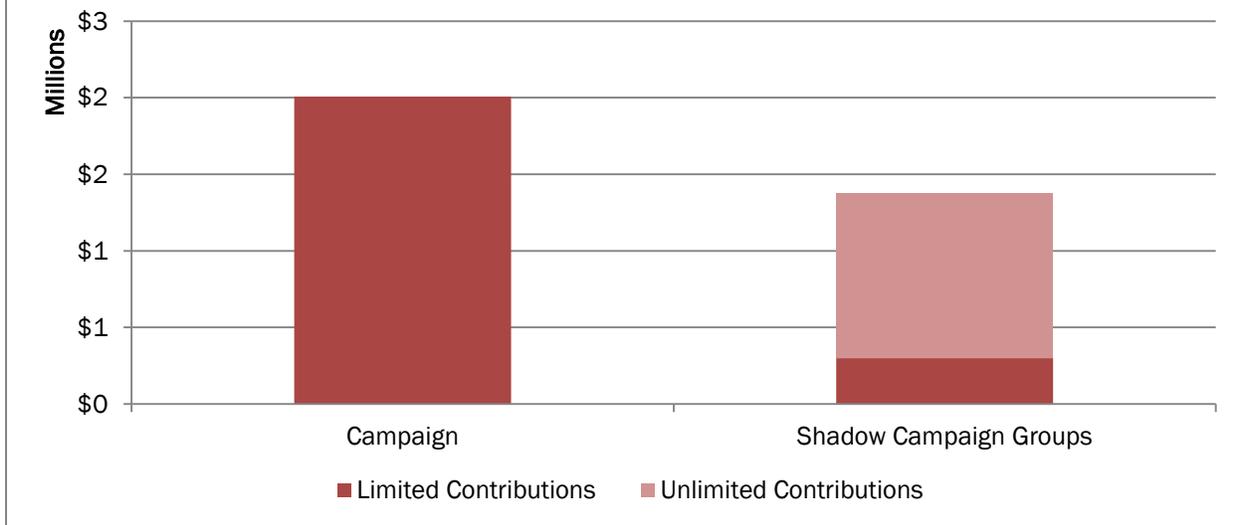
A Kasich spokesman [told](#) the *Columbus Dispatch* that New Day for America and another pro-Kasich 527 (discussed below) would “stay active” once Kasich declared, although one or both would become a super PAC “so that its money can be focused more directly on helping Kasich.”

Other Pro-Kasich Groups

New Day Independent Media Committee Inc. [registered](#) as a 527 political organization in June, its name echoing that of the super PAC New Day for America. Its IRS filing states that it will only spend money on media like TV and internet ads. According to reporting by the *Plain Dealer*, a “[media consultant](#)” for the 527, Fred Davis, has been “[working with the governor](#)” to make ads.

Kasich also has a 501(c)(4) called Balanced Budget Forever that [advocates](#) for an amendment to the U.S. Constitution requiring a balanced federal budget, as reported by *Politico*. Although the group is not focused on the presidential race, it has given Kasich a platform to raise his profile, and he told *Politico* that the issue should be “front and center in the presidential election.” The *Columbus Dispatch* reports that Balanced Budget Forever was [formed](#) by former Ohio House Speaker Jo Ann Davidson, who *The Washington Post* notes serves as an [adviser](#) to New Day for America.

Martin O'Malley Shadow Campaign Fundraising



Groups Supporting O'Malley	Organization	Contributions	Fundraising
O'Malley for President	Campaign comm.	Limited	\$2,006,905
O'Say Can You See PAC	Leadership PAC	Limited	\$299,422
O'Say Can You See PAC – Non-federal	527	Unlimited	\$784,351
Generation Forward	Super PAC	Unlimited	\$289,442

Generation Forward

Generation Forward – Reported Ties	
Candidate fundraising	
Campaign approval	
Former high-level candidate staff	✓
Founded by candidate's associates	✓
Sharing vendors with campaign	

A few days before former Maryland governor Martin O'Malley announced his presidential campaign, Damian O'Doherty [told](#) *The Washington Post* about his plan to launch a super PAC called Generation Forward “to bolster the Democrat’s prospects.” O'Doherty, the group’s chief executive, has “known O'Malley for decades,” according to the *Post*, but said he had not discussed the super PAC with the candidate. A co-

founder of Generation Forward, Ron Boehmer, was O'Malley’s press secretary in the governor’s office, as reported by the *Post*.

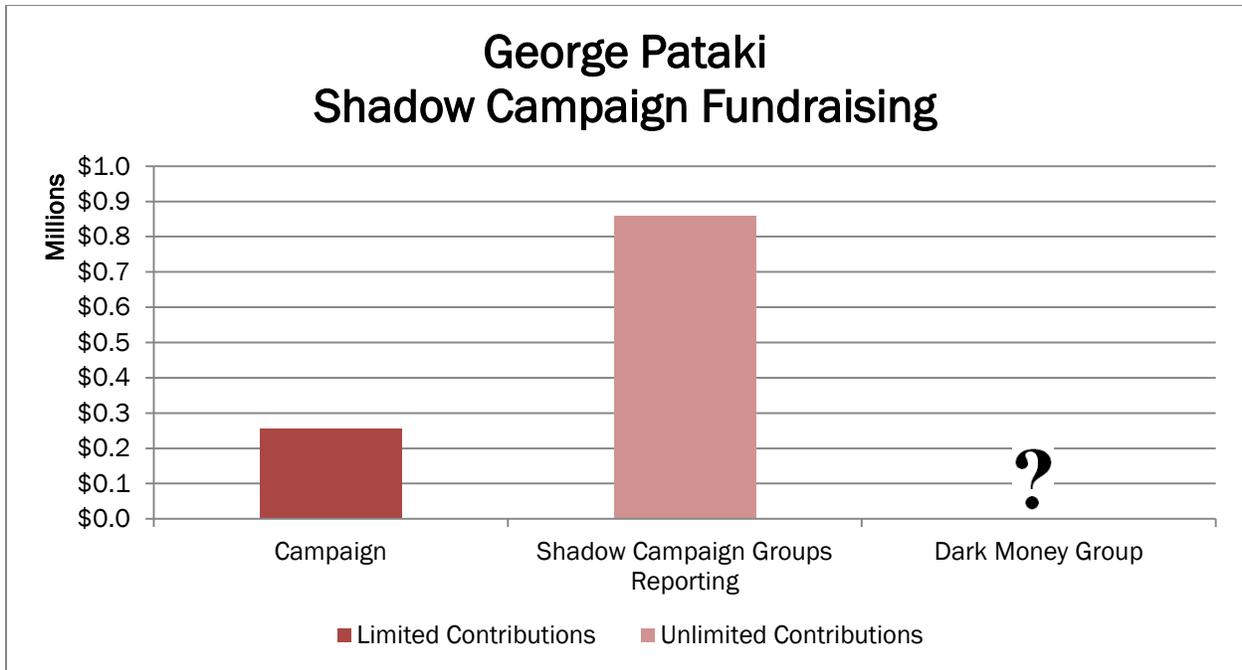
After the super PAC ran an ad attacking rival Democrat Bernie Sanders, O'Malley said in an [interview](#) with New Hampshire Public Radio: “I would hope that we would keep this debate a debate about the issues and I would prefer, not that I’m able to tell a super PAC what to do, I would prefer that we didn’t have any super PACs, frankly.”

Other Pro-O'Malley Groups

O'Malley has had a leadership PAC, O'Say Can You See PAC, since 2012. *The Washington Post* [cited](#) a spokesman that year as saying that “O'Malley’s existing fundraising team will also raise money for O'Say Can You See.” CBS News has [reported](#) that O'Malley raised money for the PAC through YouTube.

There is also a 527 that shares a similar name, O'Say Can You See PAC – Non-federal. The treasurer for both the 527 and the leadership PAC according to FEC and IRS filings, Martin Cadogan, has also been O'Malley's campaign treasurer since 1990 in mayoral in gubernatorial campaigns, according to Cadogan's website [bio](#) (although Cadogan is not the treasurer for O'Malley's presidential committee).

O'Say Can You See PAC – Reported Ties	
Candidate fundraising	✓
Campaign approval	✓
Former high-level candidate staff	✓
Founded by candidate's associates	
Sharing vendors with campaign	



Groups Supporting Pataki	Organization	Contributions	Fundraising
Pataki for President	Campaign comm.	Limited	\$255,795
We the People, Not Washington	Super PAC	Unlimited	\$859,243
Americans for Real Change	Unknown	Unknown	Unknown

We the People, Not Washington

We the People, Not Washington – Reported Ties	
Candidate fundraising	✓
Campaign approval	✓
Former high-level candidate staff	✓
Founded by candidate’s associates	
Sharing vendors with campaign	

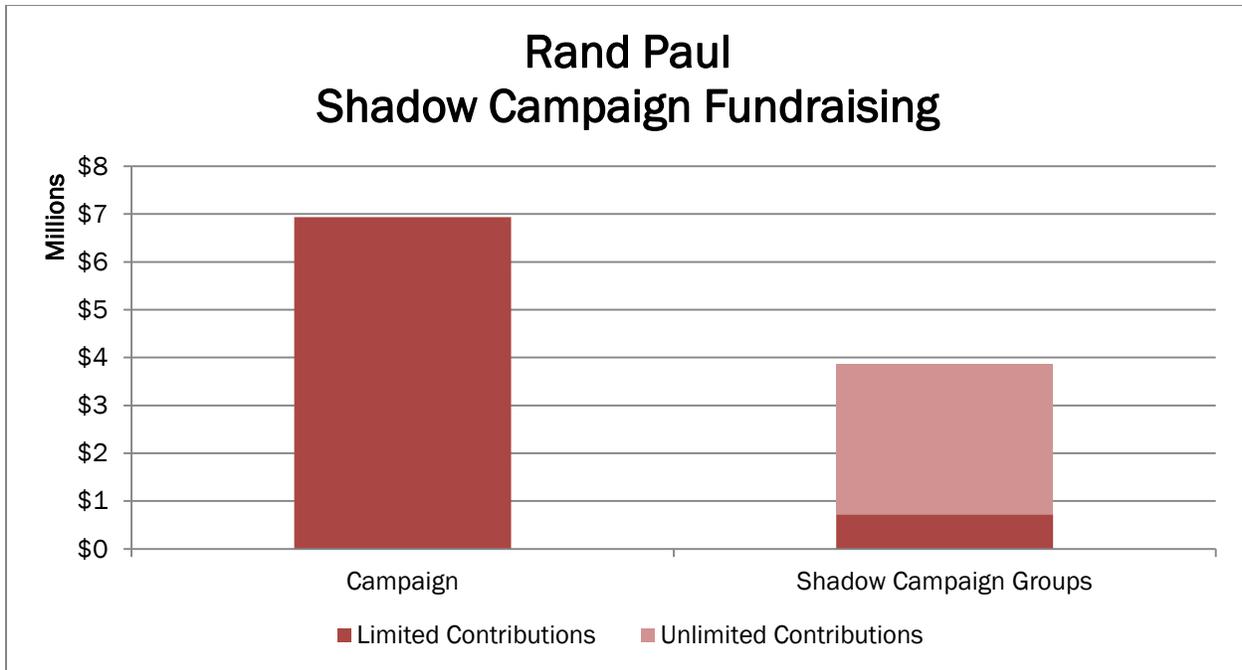
One of the first single-candidate super PACs to register this cycle was We The People, Not Washington, which “was formed to [support](#) former New York Gov. George Pataki,” [according](#) to the Center for Public Integrity. *Bloomberg* reports that the group claims Pataki as “[honorary chairman](#).” [According](#) to *The Washington Post*, “Among

those leading the [super PAC’s] fundraising are several Pataki associates who got paid from the money he raised in past” campaigns. In March, the *Post* [reported](#), “Pataki was the guest of honor at a fundraiser for his super PAC at a private Manhattan club, where co-chairs were asked to contribute \$250,000 each.”

The super PAC’s website features a form allowing visitors to [request a meeting with Pataki](#), according to the *Post*. And on an April [tour](#) of New Hampshire, the former governor used a car that belonged to the spokeswoman for We The People, Not Washington, as reported by *Bloomberg*.

Other Pro-Pataki Groups

Pataki appeared last year in an ad [released](#) by an organization called Americans for Real Change. It is unclear what form the organization takes; it has been [reported](#) in the *New York Daily News* to be a super PAC, but it is not registered with the FEC or as a political organization with the IRS. Pataki’s [bio](#) on the website of We The People, Not Washington lists him as a spokesman for Americans for Real Change. It is unknown who Americans for Real Change is run by.



Groups Supporting Paul	Organization	Contributions	Fundraising
Rand Paul for President	Campaign comm.	Limited	\$6,932,779
RANDPAC	Leadership PAC	Limited	\$723,469
America's Liberty PAC	Super PAC	Unlimited	\$3,132,596

America's Liberty PAC

America's Liberty PAC – Reported Ties	
Candidate fundraising	✓
Campaign approval	
Former high-level candidate staff	✓
Founded by candidate's associates	
Sharing vendors with campaign	

America's Liberty PAC is a super PAC founded by veterans of Kentucky Sen. Rand Paul's 2010 campaign, as well as his father's presidential campaigns, [according](#) to *National Journal*. The group is run by "longtime Paul strategist" Jesse Benton, who managed the senator's 2010 campaign and is also married to his niece, as reported by *National Journal*. A communications director in Paul's Senate office, Dan Bayens, left in May to [join](#)

America's Liberty, according to *The New York Times*. Bayens has also [worked](#) for Paul's leadership PAC, RANDPAC, *Politico* reports.

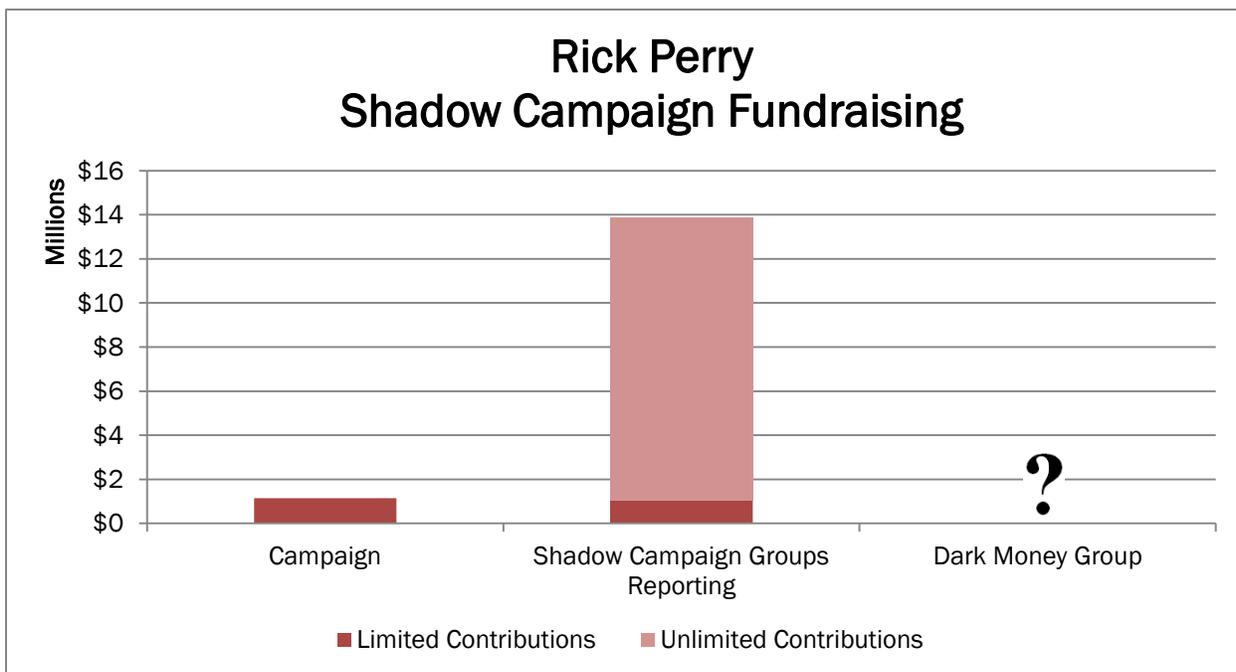
The New York Times [reported](#) that Sen. Paul "sought donations for America's Liberty PAC from about 15 tech investors" before he declared his presidential campaign. The group's website claims it is "[endorsed by Senator Paul](#)." Benton [told Bloomberg](#) that America's Liberty is "the only PAC that will host Senator Paul at events."

Other Pro-Paul Groups

Sen. Paul has had a leadership PAC since 2011, called Reinventing a New Direction, or RANDPAC, FEC filings show. RANDPAC has been one of the [most successful](#) Senate leadership PACs in terms of fundraising. In the 2013-2014 cycle, it took in \$3.7 million. [According](#) to event invitations collected by the Sunlight Foundation, Paul has appeared at joint fundraisers for RANDPAC and his presidential campaign.

There are several pro-Paul super PACs in addition to America's Liberty PAC, although we are aware of no evidence that any of them have ties with Paul's presidential campaign.

RANDPAC – Reported Ties	
Candidate fundraising	✓
Campaign approval	
Former high-level candidate staff	
Founded by candidate's associates	
Sharing vendors with campaign	



Groups Supporting Perry	Organization	Contributions	Fundraising
Perry for President	Campaign comm.	Limited	\$1,139,484
RickPAC	Traditional PAC	Limited	\$1,030,962
Opportunity and Freedom PAC	Super PAC	Unlimited	\$2,815,326
Opportunity and Freedom I	Super PAC	Unlimited	\$10,000,000
Opportunity and Freedom II	Super PAC	Unlimited	\$0
Americans for Economic Freedom	501(c)(4)	Unlimited	Unknown

Opportunity and Freedom Network

Opportunity and Freedom Network – Reported Ties	
Candidate fundraising	
Campaign approval	
Former high-level candidate staff	✓
Founded by candidate’s associates	✓
Sharing vendors with campaign	

Three super PACs with variations on the name “Opportunity and Freedom” are “supporting former Texas Gov. Rick Perry” in his presidential bid, according to CNN. FEC filings show that the treasurer for all three, Stefan Passantino, was also the founding treasurer for Perry’s traditional PAC, RickPAC.

According to CNN, the super PAC network is run by “senior adviser” Austin Barbour, who the *Texas Tribune* reports is the brother of “a longtime friend of Perry’s and informal adviser over the years.” Opportunity and Freedom PAC is co-chaired by two former chiefs of staff to Gov. Perry, as reported by *The Washington Post*.

Perry’s campaign manager referred to the super PACs’ funds when discussing Perry’s viability as reported by CNN, saying, “between the campaign and independent sources, the necessary funds will be in place to run a competitive, successful campaign.” A \$6 million donor to one of the super PACs, Kelcy Warren, is also the Perry campaign’s finance chairman, and his company employs Perry on its board, according to *The Washington Post*.

One of the super PACs, Opportunity and Freedom II, was created after the end of the second quarter, so its fundraising is not reported in the most recent FEC filings. CNN quoted Barbour saying that it raised [\\$4 million from a single donor](#) immediately upon forming.

Other Pro-Perry Groups

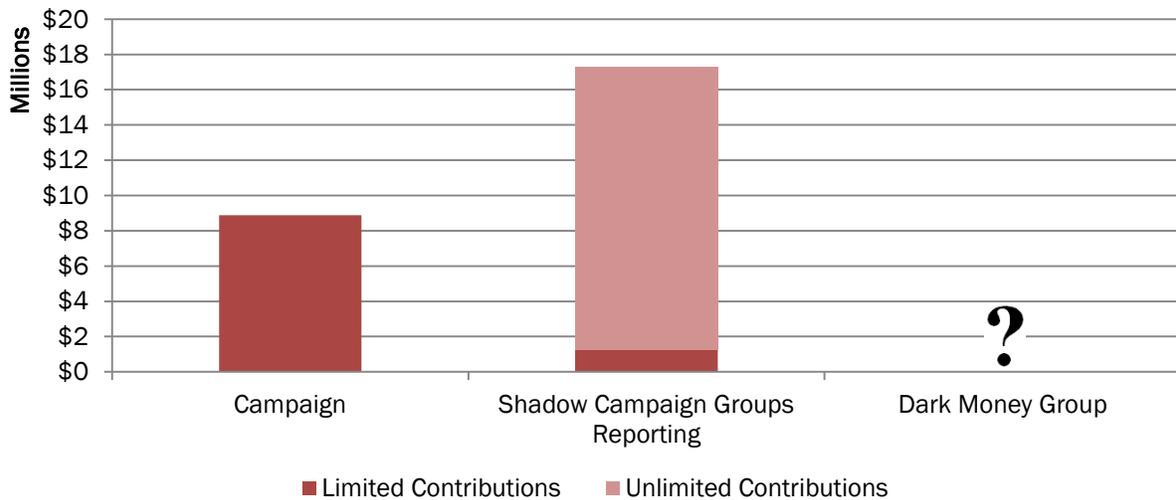
RickPAC – Reported Ties	
Candidate fundraising	✓
Campaign approval	✓
Former high-level candidate staff	
Founded by candidate’s associates	
Sharing vendors with campaign	

In 2014, Perry created a traditional PAC, RickPAC, and he has “recruited more than 80 major donors” for the committee, [according](#) to *The Washington Post*. The group has produced [videos starring](#) Perry.

Americans for Economic Freedom is a 501(c)(4) that was [started](#) 2013 “ with more than \$200,000 in leftover cash from a now-defunct Super PAC that raised millions for

Perry’s failed 2012 bid,” as reported by the *Houston Chronicle*. The group’s CEO according to the *Chronicle*, Jeff Miller, also worked for RickPAC and was [described](#) by the *Texas Tribune* as “Perry’s chief political strategist.” Miller “was a top fundraiser and director of Perry’s California operations during the 2012 presidential race,” [according](#) to the *Tribune*. The nonprofit has produced several [TV ads](#) featuring Perry, posted on its website, and it “sponsored” his trips to Israel and the United Kingdom, *National Journal* [reports](#).

Marco Rubio Shadow Campaign Fundraising



Groups Supporting Rubio	Organization	Contributions	Fundraising
Marco Rubio for President	Campaign comm.	Limited	\$8,876,868
Reclaim America PAC	Leadership PAC	Limited	\$1,258,027
Conservative Solutions PAC	Super PAC	Unlimited	\$16,057,755
Conservative Solutions Project, Inc.	501(c)(4)	Unlimited	\$15.8 million since 2014

Instead of creating a new campaign committee for his presidential candidacy, Florida Sen. Marco Rubio transformed his Senate committee into a presidential one. In effect, this means he transferred his Senate campaign’s money into his presidential campaign, inflating his fundraising total for the election cycle. The campaign fundraising total we report here is only the amount Rubio raised in the second quarter, since declaring his White House bid.

Conservative Solutions PAC

Conservative Solutions PAC – Reported Ties	
Candidate fundraising	
Campaign approval	
Former high-level candidate staff	
Founded by candidate’s associates	✓
Sharing vendors with campaign	

Sen. Rubio’s campaign for president is “set to benefit from” a super PAC called Conservative Solutions PAC, [according](#) to *The Washington Post*. *The New York Times* [reported](#) that J. Warren Tompkins “is expected to oversee the group.” Tompkins is a [former business partner of Rubio’s campaign manager](#), Terry Sullivan, according to *Politico*. The two co-founded a political consulting firm in South Carolina that has done [work](#) for Rubio, according to the *Miami Herald*.

Other Pro-Rubio Groups

Reclaim America PAC – Reported Ties	
Candidate fundraising	✓
Campaign approval	
Former high-level candidate staff	✓
Founded by candidate’s associates	
Sharing vendors with campaign	

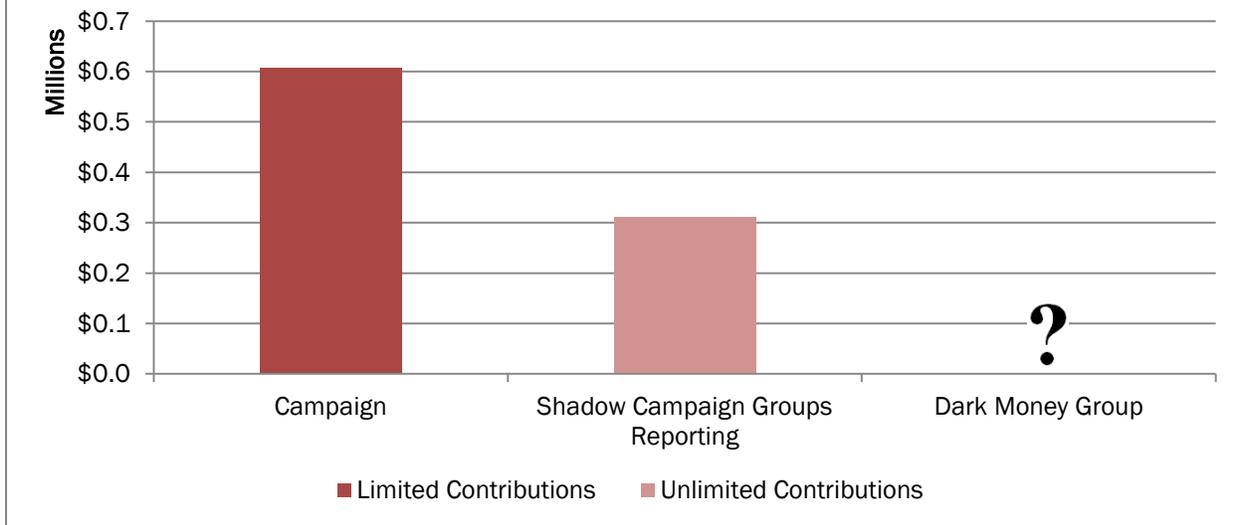
Since 2011, Rubio has had a leadership PAC, Reclaim America PAC, FEC filings show. Its revenue has been among the [highest](#) for Senate leadership PACs, with \$3.9 million raised in the 2013-2014 cycle. *Politico* has [reported](#) Rubio fundraising for the group. According to *The Washington Post*, Rubio’s Senate chief of staff left to lead Reclaim America as a “[senior adviser](#).”

Tompkins, the head of the super PAC, also runs a 501(c)(4) group called the Conservative Solutions Project, [according](#) to *Politico*. *National Journal* reported that Pat Shortridge was involved in establishing the nonprofit; Shortridge has [worked for Rubio](#) in the past, according to *MinnPost*. *National Journal* quoted the super PAC’s spokesman to say that the two “Conservative Solutions” groups are “[related](#),” although the nonprofit is “focused on issue education.”

The nonprofit has spent [millions](#) of dollars on [ads](#) that prominently feature Sen. Rubio. In 2014, Conservative Solutions Project also commissioned a book of research on voters in early primary states. [According](#) to *National Journal*, the book “includes detailed findings about voters’ views on issues such as immigration reform — which Rubio championed in the Senate in 2013 — as well a muscular, Rubio-style foreign policy.” And it was prepared by a consulting firm that has also done data and analytics work for Rubio’s PAC, *National Journal* reports.

Conservative Solutions Project has [announced](#) raising \$15.8 million since its founding in 2014, according to *Politico*. This amount is not included in the bar graph above to avoid a misleading comparison across different time periods.

Rick Santorum Shadow Campaign Fundraising



Groups Supporting Santorum	Organization	Contributions	Fundraising
Santorum for President	Campaign comm.	Limited	\$607,617
Patriot Voices PAC	Hybrid PAC	Unlimited	\$310,962
Working Again PAC	Super PAC	Unlimited	\$0
Patriot Voices	501(c)(4)	Unlimited	\$7.7 million since 2012

Working Again PAC

Working Again PAC – Reported Ties	
Candidate fundraising	
Campaign approval	
Former high-level candidate staff	✓
Founded by candidate’s associates	✓
Sharing vendors with campaign	

“A team of former aides and allies” to former Sen. Rick Santorum established Working Again PAC in July, as [reported](#) by *Politico*. The super PAC’s executive director, Nadine Maenza, served as [finance director](#) for Santorum’s 2012 bid for the White House, according to *USA Today*. She also “oversees” Patriot Voices, a nonprofit that Santorum chaired until he launched this cycle’s presidential campaign, *USA Today* noted. The

super PAC also includes Virginia Davis, “a communications aide for Santorum for most of the last 15 years;” his former chief of staff; and a former Senate staffer, [according](#) to *Politico*.

Working Again has yet to report any revenue because it was formed after the end of the second quarter reporting period.

Other Pro-Santorum Groups

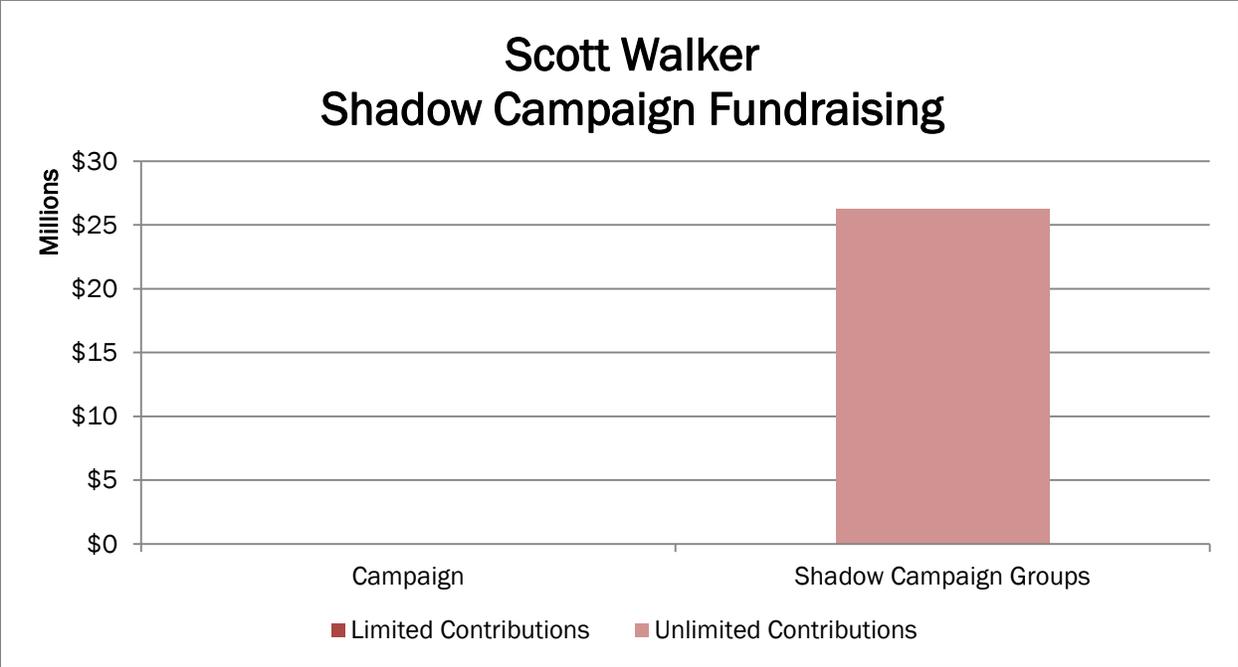
Patriot Voices PAC – Reported Ties	
Candidate fundraising	
Campaign approval	✓
Former high-level candidate staff	✓
Founded by candidate's associates	
Sharing vendors with campaign	

Shortly after the end of Santorum's 2012 presidential bid, he [formed](#) a nonprofit, Patriot Voices, [run](#) by Nadine Maenza, his former finance director and current leader of Working Again PAC. Maenza also runs a PAC called Patriot Voices PAC. According to *National Journal*, longtime Santorum communications aide Virginia Davis works for [both](#) the nonprofit Patriot Voices and Patriot Voices PAC. As noted above, Davis is also tied to Working Again PAC.

According to FEC filings, Patriot Voices PAC is a hybrid PAC, which means it has one account that is subject to contribution limits like a traditional PAC and another account that operates like a super PAC, without contribution limits.

The two Patriot Voices groups together have [announced](#) raising \$8 million since 2012. The PAC side has reported only \$310,962 in revenue, hinting that the nonprofit may have collected the great majority of the million total, almost \$7.7 million. This estimate is not included in the bar graph above to avoid comparison between different time periods.

According to *USA Today*, major Santorum super PAC donor from 2012, Foster Friess, has said, "[I will find ways to support Rick financially that will be less visible.](#)" That could mean giving to Patriot Voices or another dark-money nonprofit.



Groups Supporting Walker	Organization	Contributions	Fundraising
Scott Walker Inc.	Campaign comm.	Limited	\$0
Unintimidated PAC	Super PAC	Unlimited	\$20,022,406
Our American Revival	527	Unlimited	\$6,207,898

Because Wisconsin Gov. Scott Walker did not officially begin his presidential campaign until after the close of the second quarter, his committee has not yet reported any funds raised.

Unintimidated PAC

Unintimidated PAC – Reported Ties	
Candidate fundraising	
Campaign approval	
Former high-level candidate staff	✓
Founded by candidate’s associates	✓
Sharing vendors with campaign	

A super PAC named after Gov. Walker’s 2013 book, *Unintimidated PAC*, [formed](#) in April. [According](#) to *Politico*, the group will be run by Keith Gilkes, Walker’s former chief of staff who ran his 2010 campaign and 2012 recall battle, and Stephan Thompson, who ran Walker’s 2014 re-election campaign.

Our American Revival

Walker formed a 527 back in January called Our American Revival, CNN [reported](#). Its [executive director](#), Rick Wiley, later became Walker’s [campaign manager](#), [according to Politico](#). The 527 [hired](#) Liz Mair, who ran online communication for Walker’s recall fight in 2012, CNN reported, although she quickly [resigned](#) over controversial tweets.

Our American Revival – Reported Ties	
Candidate fundraising	
Campaign approval	
Former high-level candidate staff	✓
Founded by candidate’s associates	✓
Sharing vendors with campaign	

Huffington Post [reported](#) that “Walker has used Our American Revival to tour the country, meet donors and party leaders and raise his own war chest for a potential campaign.” The group’s [website](#) prominently features pictures of Walker and hosts statements by him about foreign affairs, education, and Hillary Clinton.

The New York Times quoted the statement of a spokeswoman for the 527 that Walker [does not control](#) Our American Revival, saying, “He is simply working with us to advance a big, bold conservative reform agenda across the country.”

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