

BEFORE THE FEDERAL ELECTION COMMISSION OF THE UNITED STATES OF
AMERICA

In the Matter of:
Courier Newsroom
Tara McGowan, CEO

MUR No. _____

COMPLAINT

1. Complainant brings this complaint before the Federal Election Commission ("FEC" or "Commission") seeking an immediate investigation and enforcement action against Courier Newsroom for violations of the Federal Election Campaign Act ("FECA" or "Act").
2. This complaint is filed pursuant to 52 U.S.C. § 30109(a)(1) and is based on information providing reason to believe that:
3. Respondent fails to meet exemptions from certain disclosure rules granted under 52 U.S.C. § 30101(9)(B) and 11 C.F.R. § 100.132(a) and (b);
4. Respondent failed to file as a political committee in violation of 52 U.S.C. § 30103(a) and 11 C.F.R. § 102.1(d);
5. Respondent failed to properly report contributions and expenditures as required pursuant to 52 U.S.C. § 30104 and 11 C.F.R. § 104.3;
6. Respondent failed to ensure that contributions were not made in violation of 52 U.S.C. § 30121 and 11 C.F.R. § 110.20; 52 U.S.C. § 30122 and 11 C.F.R. § 110.4.

STATEMENT OF THE LAW

7. Under 11 C.F.R. § 100.132 certain media outlet news stories, commentary, or editorials are exempt from the definition of "expenditure" unless "owned or controlled by any political party, political committee, or candidate. . ."
8. 52 U.S.C. § 30103(a) and 11 C.F.R. § 102.1(d) requires political committees to file a Statement of Organization no later than ten days after becoming a political committee.
9. 11 C.F.R. § 100.5(a) defines a political committee as any committee, club, association, or other group of persons which receives contributions aggregating in excess of \$1,000 or which makes expenditures aggregating in excess of \$1,000 during a calendar year.
10. Pursuant to 52 U.S.C. § 30104 and 11 C.F.R. § 104.3, a political committee is required to file a report containing all receipts and expenditures, including the itemization of each.
11. The law prohibits certain sources from making contributions to political committees. Pursuant to 52 U.S.C. § 30121 and 11 C.F.R. § 110.20, foreign nationals are prohibited from making contributions and expenditures. Additionally, expenditures and contributions made in the name of another are also prohibited under 52 U.S.C. § 30122 and 11 C.F.R. § 110.4.

STATEMENT OF FACTS

12. Courier Newsroom is organized as a C-corporation under the Internal Revenue Code and lists its legal domicile as the state of Delaware.¹
13. Courier Newsroom is a project of ACRONYM, a 501(c)(4).² Founded in 2017, ACRONYM describes itself as “a values-driven organization focused on advancing progressive causes[.]”³ By the end of 2018, ACRONYM raised more than \$18 million, registered 60,000 voters, ran 105 targeted ad campaigns covering 15 states, and worked to elect 63 progressive candidates.⁴
14. ACRONYM’s President and CEO Tara McGowan said Courier Newsroom was created as the Democrat’s counter to the 2016 digital spending by the Trump campaign and the Republican National Committee (“RNC”).⁵
15. Courier Newsroom rolled out digital newspapers in six presidential swing states that pose as local newspapers and use nondescript names such as “*Cardinal and Pine*” and “*Up North News*.”⁶ The work of Courier Newsroom has been used to promote vulnerable House Democrats as well as target top-of-the-ticket voters in swing states.⁷ Ms. McGowan said one such newspaper, the *Dogwood*, “will not only function to support the flipping of both State House and State Senate chambers in Virginia this November [2017], but will serve as a vehicle to test, learn from and scale best practices to new sites as we grow.”⁸
16. In addition to “flipping” legislative districts, Courier Newsroom focuses on distributing stories to “strategic segments of voters” to “drive strategic narratives to key audiences,” with the news sites working to persuade and turnout voters. Included in this strategy is working closely with political groups and engaging Democratic campaigns to help understand politically significant content with local audiences. Ultimately, its network enables Democrats to compete with Republicans.⁹
17. Courier Newsroom is part of a \$25 million fundraising campaign from wealthy progressive donors, and as of September of 2020, has spent over \$1.8 million on Facebook ads alone.¹⁰
18. In addition to funding from donors, Courier Newsroom adopted a revenue model to “serve both Democratic organizations and progressive advocacy organizations to advance their strategic objectives” through partnering with these groups for strategy and content development fees.¹¹
19. *Bloomberg Businessweek* highlighted that Courier Newsroom’s publications are just “political instruments” designed to “deliver the facts favorable to Democrats” and “designed to get [readers] to vote for Democrats.”¹²

¹ ACRONYM, Form 990 (2018).

² ACRONYM, Form 990 (2018).

³ ACRONYM, About.

⁴ Nick Fouriezos, *Meet The Democrats’ Most Dangerous Digital Strategist*, OZY (Sept. 5, 2019).

⁵ ACRONYM, Form 990 (2018); Joshua Green, *The Left’s Plan to Slip Vote-Swaying News Into Facebook Feeds*, Bloomberg Businessweek (Nov. 25, 2019).

⁶ Alex Thompson, *Newsroom or PAC? Liberal group muddies online information wars*, Politico (July 14, 2020).

⁷ Courier, Twenty for 2020 (Mar. 16, 2020).

⁸ Exhibit A. Tara McGowan, *Acronym News Corp 2019-2020 Rapid Build Plan*, MEMO, 3 (June 20, 2019).

⁹ Exhibit A. Tara McGowan, *Acronym News Corp 2019-2020 Rapid Build Plan*, MEMO, 5 (June 20, 2019).

¹⁰ Green, *supra* note 5; Thompson, *supra* note 6; Facebook, Political Ad Tracker, Courier.

¹¹ Exhibit A. Tara McGowan, *Acronym News Corp 2019-2020 Rapid Build Plan*, MEMO, 8 (June 20, 2019).

¹² Green, *supra* note 5.

20. *Politico* found its activity is “more akin to a PAC than a newsroom” with its newspapers acting “like a loose arm of the Democratic Party.”¹³
21. In August of 2020, Facebook announced a new policy in which it will prevent news outlets from claiming the news exemption within its political ads authorization process, if they have “direct, meaningful ties” to political groups.¹⁴

CAUSES OF ACTION

AGAINST RESPONDENT COURIER NEWSROOM

Failing to Qualify Under the Media Exemption Pursuant to 52 U.S.C. § 30101(9)(B) and 11 C.F.R. § 100.132(a) and (b)

22. The media exemption exists to give legitimate news organizations the ability to operate in the ordinary course of business absent certain FEC oversight.¹⁵ In order for Courier Newsroom to make expenditures exempt from disclosure and registration with the FEC, it must demonstrate that it first is a media entity within the regulations under the Act. The relevant analysis is “whether the entity in question is in the business of producing on a regular basis a program that disseminates news stories, commentary, and/or editorials.”¹⁶ In this case, Courier Newsroom is a news outlet in name only; its fundamental purpose since its inception is to “enable Democrats to compete with Republican echo chambers online.”¹⁷ Unlike a legitimate news organization, its distribution of news is not widespread but strategically selected for competitive congressional districts and presidential swing states.¹⁸ These stories are not driven by the news cycle but rather takes signals from vulnerable candidates’ microsites to help shape its messaging.¹⁹ As reported, these stories are one-sided political advertisements purporting to be news articles, and as others have assessed, “nothing alerts readers that Courier Newsroom publications aren’t actually traditional hometown newspapers but political instruments designed to get them to vote for Democrats.”²⁰
23. In the second prong of the analysis, Courier Newsroom fails to demonstrate that it is “acting within its legitimate media function in conducting the activity at issue.” The organization’s method and manner of operation demonstrates that it is “owned or controlled by a political party, political committee, or candidate.”²¹ The group that backs Courier Newsroom, ACRONYM, is “focused on advancing progressive causes” through leveraging millions of dollars in campaign contributions to work to elect progressive candidates.²² ACRONYM founder and Courier Newsroom CEO Tara McGowan stated that Courier Newsroom was started for the purpose of countering messaging by the Trump campaign and RNC spending, and flipping districts towards Democrats, rather than to serve as an objective news outlet.²³ Additionally, Facebook has recognized the nature of Courier Newsroom’s “direct, meaningful ties” to the political entity ACRONYM, with political operative Tara McGowan at the helm,

¹³ Thompson, *supra* note 6.

¹⁴ Sara Fischer, *Facebook cracks down on political content disguised as local news*, *Axios* (Aug. 11, 2020).

¹⁵ 52 U.S.C. § 30101(9)(B) and 11 C.F.R. § 100.132(a) and (b).

¹⁶ FEC Advisory Opinion (2019-05).

¹⁷ Exhibit A. Tara McGowan, *Acronym News Corp 2019-2020 Rapid Build Plan*, MEMO, 5 (June 20, 2019); Green, *supra* note 5.

¹⁸ Thompson, *supra* note 6; Courier, *Twenty for 2020* (Mar. 16, 2020).

¹⁹ Abigail Spanberger for Congress, *In the News*; Xochitl Torres Small for Congress, *Media*; Cindy Axne for Congress, *Media*; Andy Kim for Congress, *Media* (*Archived*).

²⁰ Green, *supra* note 5.

²¹ FEC Advisory Opinion (2019-05).

²² ACRONYM, *About*; Fouriez, *supra* note 4.

²³ Green, *supra* note 5.

resulting in Facebook cracking down on its political content disguised as local news.²⁴ *Politico* also recognized the true nature of Courier Newsroom that it is “more akin to a PAC than a newsroom” with its newspapers acting “like a loose arm of the Democratic Party.”²⁵ Because ACRONYM’s mission is to use Courier Newsroom as a political weapon rather than a news outlet, its activities and mission fail to meet the exemption granted for legitimate press activity.

Failing to Register with the FEC as Required by 52 U.S.C. § 30103(a) and 11 C.F.R. § 102.1(d)

24. Courier Newsroom has failed to file a statement of organization with the FEC. Any organization which receives contributions in excess of \$1,000 or makes expenditures exceeding \$1,000 in a calendar year is considered a political committee.²⁶
25. Courier Newsroom has leveraged its funding to focus on spending in six presidential swing states and to support over a dozen vulnerable House Democrats.²⁷ Its spending on Facebook ads alone accounts for over \$1.8 million as of September of 2020. One newspaper, the *Dogwood*, spent about \$275,000 on Facebook ads to flip Virginia legislative districts.²⁸
26. Courier Newsroom’s funding and political spending trigger its classification as a political committee. The law makes clear that a political committee must register with the FEC within ten days of meeting the requirements of this classification. Operating for over a year without the requisite filing with the FEC, the group has been immune to any oversight and accountability despite its significant impact on state and federal races.

Failing to Properly File Reports and Disclosing Contributions and Expenditures in Violation of 52 U.S.C. § 30104 and 11 C.F.R. § 104.3

27. As a political committee, Courier Newsroom is subject to reporting requirements under FECA.²⁹ Courier Newsroom is benefitting from a \$25 million fundraising campaign and yet it has failed to disclose the source of the contributions.³⁰ These donors are making sizable political contributions anonymously while registered entities with the FEC, influencing the very same districts, are required to disclose donors. Further, Courier Newsroom’s revenue model allows for undisclosed spending by unknown organizations to influence election outcomes.³¹ Courier Newsroom has not only violated a fundamental requirement incumbent upon political committees, but it has failed to provide transparency to the electorate, thereby demonstrating that certain safeguards are in place to ensure the protection of the election process from undue influence.

Failing to Ensure No Prohibited Contributions in Violation of 52 U.S.C. § 30121 and 11 C.F.R. § 110.20; 52 U.S.C. § 30122 and 11 C.F.R. § 110.4

28. Courier Newsroom has failed to properly file and report contributions to the FEC, and therefore, has potentially run afoul of prohibited source contributions.³² Federal law is clear

²⁴ Fischer, *supra* note 14.

²⁵ Thompson, *supra* note 6.

²⁶ 11 C.F.R. § 100.5(a)

²⁷ Courier, *Twenty for 2020* (Mar. 16, 2020).

²⁸ Green, *supra* note 5.

²⁹ 52 U.S.C. § 30104 and 11 C.F.R. § 104.3.

³⁰ Federal Election Committee, Search Candidate and Committee Profiles, Courier Newsroom, [Results](#).

³¹ Exhibit A. Tara McGowan, *Acronym News Corp 2019-2020 Rapid Build Plan*, [MEMO](#), 8-9 (June 20, 2019).

³² 52 U.S.C. § 30121; 52 U.S.C. § 30122; 11 CFR § 110.20; 11 CFR § 110.4.

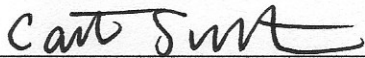
that foreign nationals may not make contributions nor independent expenditures on behalf of candidates. Courier Newsroom has spent significantly on elections, propping up vulnerable House candidates, over \$1.8 million in Facebook ads alone, and yet the donors have not been disclosed.³³ There is no safeguard to ensure that these expenditures were not made with contributions by foreign nationals. Additionally, Courier Newsroom has failed to ensure that the contributions it has received were not made in the name of another. By failing to properly register and file with the FEC, Courier Newsroom has not protected its election spending from prohibited sources.

PRAYER FOR RELIEF

29. Wherefore, the Commission should find reason to believe that Courier Newsroom has violated fundamental compliance and transparency rules when it failed to meet any exemption under 52 U.S.C. § 30101(9)(B) and 11 C.F.R. § 100.132(a) and (b), failed to register with the FEC pursuant to 52 U.S.C. § 30103(a) and 11 C.F.R. § 102.1(d), failed to report contributions and expenditures required by 52 U.S.C. § 30104 and 11 C.F.R. § 104.3, and failed to ensure no prohibited contributions under 52 U.S.C. § 30121 and 11 C.F.R. § 110.20; 52 U.S.C. § 30122 and 11 C.F.R. § 110.4. The Commission should conduct an immediate investigation under 52 U.S.C. § 30109(a)(2) and determine and impose appropriate sanctions for any and all violations. Further, the Commission should enjoin respondent from any future violations, and impose any necessary and appropriate remedies to ensure respondent future compliance with FECA.

September 3, 2020

Respectfully Submitted,



Caitlin Sutherland, Executive Director
Americans for Public Trust
107 South West Street, Suite 442
Alexandria, VA 22314

³³ Thompson, *supra* note 6; Facebook, [Political Ad Tracker](#), Courier.

VERIFICATION

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

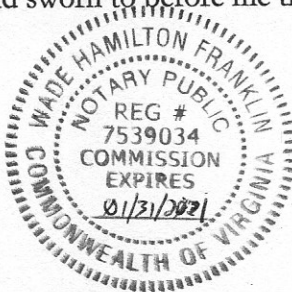
For Complainant "Americans for Public Trust"

Caitlin Sutherland
Caitlin Sutherland

City of Arlington
Commonwealth of Virginia

The foregoing instrument was subscribed and sworn to before me this 3rd day of September 2020 by Caitlin Sutherland.

Wade Hamilton Franklin
Notary Public



Notary registration number: 7539034

My commission expires: 01/31/2021

Exhibit A

MEMO

To: Interested Parties
From: Tara McGowan, CEO of ACRONYM
Date: June 20, 2019
Re: ACRONYM News Corp 2019-2020 Rapid Build Plan

OVERVIEW

The Democratic Party, long reliant on television and radio, is losing the media war. But why? Two key trends begin to illustrate the answer. First, local newspapers have collapsed: 60% of US counties have no daily newspaper (but used to) -- creating a massive content void¹. At the same time, social media has exploded, providing new channels for reaching target audiences.

The GOP and far right understand this and have invested heavily in building a network of digital media properties to amplify and accelerate their messaging across channels, helping them to drive national and local narratives. These media properties are influencing the opinions and behaviors of key audiences, especially audiences who live in "narrative deserts". Meanwhile Democratic organizations and campaigns continue to rely heavily on cycle-driven paid advertising programs to inform and mobilize voters.

Since the internet exploded onto the political scene in 2003, the conventional wisdom has been that the internet is good for "preaching to the converted" -- in other words, fundraising from the base -- and not for much else. In 2016, the Hillary Clinton for President campaign raised an estimated \$800 million online - and spent a large majority of it on television and radio advertisements.²

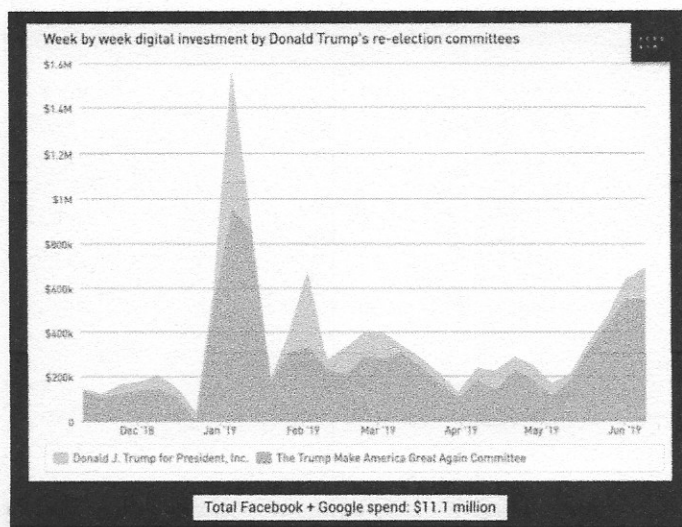
¹ According to a 2015 Pew Research study, 21 U.S. states used to send local reporters to Washington DC as correspondents but no longer do -- leading to an absence of reported news about how political and public policy decisions in DC impact local communities. For a full discussion of the collapse of local news in America, see the work of Penelope Muse Abernathy, Knight Chair in Journalism and Digital Media Economics at the University of North Carolina School of Media and Journalism's Center for Innovation and Sustainability in Local Media -- much of it is available at <https://www.usnewsdeserts.com/>

² Estimates by Harvard Kennedy School faculty Nicco Mele based on data analysis of FEC campaign fundraising and spending disclosures; see <https://www.bloomberg.com/politics/graphics/2016-presidential-campaign-fundraising/>

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Meanwhile, Trump and the Republican Party spent overwhelmingly on digital channels (properties owned by allies, as well as Facebook, Google, and other familiar mainstream platforms). The Republicans used those digital channels to shape and drive mainstream media coverage³.

The 2020 cycle is shaping up to follow the contours of the 2016 race. Trump's campaign has spent over \$11 million and counting on Facebook and Google alone in the last seven months, dramatically outspending all of the Democratic candidates and PACs combined.



The GOP's approach to online media is strategic, impact-oriented, and involves an entirely new way of thinking about the media landscape. The traditional approach, using mass media like TV and radio, involves speaking directly to a (shrinking) mass media audience. But since 2010, companies like Unilever have been shifting their advertising and marketing from discrete, short-run, expensive TV and radio campaigns to "always on" digital content and marketing war-rooms – an approach that the Trump campaign took from day 1.⁴

³ As documented by Yochai Benkler, Rob Faris and Hal Roberts in their 2018 Oxford University Press book *Network Propaganda: Manipulation, Disinformation, and Radicalization in American Politics*

⁴ For a full discussion of this remarkable transformation in mainstream brand advertising strategies, see the July-August 2014 issue of the Harvard Business Review *"The Ultimate Marketing Machine"* by Marc de Swaan AronsFrank van den DriestKeith Weed: <https://hbr.org/2014/07/the-ultimate-marketing-machine>

The GOP/Trump approach starts by spending money on Facebook and Google to drive Trump's message. That message gets amplified by ideological digital media outlets, and then gets shared back on Facebook and Google by eager audiences. With commercial non-partisan local news in total collapse in the United States, this partisan content is filling a void – and dramatically manipulating mainstream media coverage.

The Democratic message and persuasion machine has long been focused on traditional media – channels that are least likely to reach core constituencies in the Democratic Party, namely minority audiences and millennials. In the 2020 political cycle, millennial and gen X voters will – *for the first time in history*-- be the largest voting bloc in the United States – larger than Baby Boomers.⁵ These are also the voters least likely to watch linear television, where Democrats currently plan to spend the bulk of their campaign dollars.

This is why ACRONYM is setting in motion a "moonshot" plan to build critical digital media infrastructure in key states to reach, persuade, and mobilize these voters. As with all of our work, we will aim to meet voters where they are and give the information they crave.

OUR MOONSHOT

In 2019, ACRONYM launched ACRONYM News Corp, a for-profit digital media company building out online news properties in seven 2020 battleground states. The first of these properties has already launched in Virginia -- "[The Dogwood](#)". "The Dogwood" will not only function to support the flipping of both State House and State Senate chambers in Virginia this November, but will serve as a vehicle to test, learn from and scale best practices to new sites as we grow.

⁵ Axios has a strong summary of the Pew Research data on this subject: <https://www.axios.com/2020-presidential-election-millennials-generation-z-8c54a77a-c6f5-40bc-850c-95e4f1217e62.html> -- more is available directly from Pew Research: <https://www.pewsocialtrends.org/essay/an-early-look-at-the-2020-electorate/>

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Our current plan has us rolling out additional media properties in (budget permitting): Arizona, North Carolina, Pennsylvania, Michigan, Wisconsin, and Florida. A full time-line of rollouts is in the appendix of this document. Year-round and always on, this media network will distribute content we create to target audiences where they live – online.



Though each property will have its own unique brand, name and small state-based editorial teams directing the framing of national and local political coverage, ACRONYM News Corp will have various centralized functions to ensure learnings are disseminated across the network for maximum impact, effectively scaling best practices.

Each property will pair original reporting and aggregated content with our ad placement and political targeting expertise to distribute these stories to strategic segments of voters before, during and between election cycles. Content designed to drive strategic narratives to key audiences will be delivered on a drip over time, reaching voters through targeted ads and boosted posts across Facebook, Instagram, Google, YouTube, Twitter and other online properties. The data collected from this network also allows ad programs to be continuously optimized to increase reach, engagement and persuasive lift among these audiences.

Over the past two years, ACRONYM has run dozens of seven-figure digital ad programs to reach voters where they are, incorporating experiments to test and identify the most effective strategies to persuade and mobilize voters online. One of the biggest lessons we learned through these programs was how much more effective boosting and targeting owned media and news content online was over pre-produced “ads” at influencing a voter’s support for or against a candidate or issue.

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This insight led us to make a significant pivot in how we approach digital content development and distribution to achieve our program and political objectives.

Building this media content network -- majority owned by ACRONYM -- will:

- Enable Democrats to compete with Republican echo chambers online
- Build nimble communications infrastructure for Dems in critical states
- Reach voters with strategic narratives + information year-round
- Make cyclical investments in paid advertising more cost-efficient + effective over time

Our mission is to build ACRONYM News Corp as a digital media company that meets people where they are with relevant, local and honest news.

EXECUTION

Target Audiences

Through digital storytelling framed to both elevate Democratic candidates and issues important to core audiences, ACRONYM News Corp will finally compete with Republican news properties and narratives where they are already reaching voters online. Like many Republican-leaning properties and voices, ACRONYM News Corp will reframe political issues and candidates through values, but unlike Republican media, these properties will only produce fact-based content and will often focus heavily on Democrats' largest base of voters: women. This does not mean producing content *about* women, but rather framing issues from health care to economic security in a way that provides these voters with more personal and local relevance than they are often targeted with through traditional political ads. Our content development and targeting capabilities will allow us to not only produce and target the distribution of content designed for specific subgroups of women (i.e. parents, college-educated women, youth, multicultural, etc.), but we will integrate constant testing and optimization of the content to let our audience inform our editorial and distribution strategies.⁶

Branding

⁶ This approach -- commonly referred to "audience aware editorial" -- has been common in newsrooms across the United States over the last decade.

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For our pilot property in Virginia, we chose a brand informed by our target audience of white suburban women 18+, but flexible enough to serve any audience without backlash: "The Dogwood". Each news site's brand will seek to reflect a key demographic audience for persuasion and turn-out, addressing the voters we most need to speak to in that state. Our team is currently working on developing the brands for the 6 remaining states.

Engaging Local Voices

In order to make this approach effective, ACRONYM News Corp will rely heavily on bringing local voices into their editorial, social and video content. Our initial targets of Virginia, Arizona, North Carolina, Pennsylvania, Michigan, Wisconsin and Florida have been selected because of their importance politically – not only in national elections but in gubernatorial and state legislative elections. Crucial to the success of our approach is a significant investment in local reporting. Each of the individual editorial content teams will be headquartered in the state the team serves, and editorial staff will be hired based on their experience and knowledge of the local and regional news landscape.

Our local content and political teams will work closely together in a number of ways. ACRONYM's political directors will engage Democratic campaigns and organizations to understand potential stories and identify local messengers/influencers. ACRONYM News Corp editorial teams will then evaluate these leads and (where appropriate) include them in content production. At the same time, our local reporters and content producers will be building and leveraging local relationships to source stories. All of the content we will develop and distribute will revolve around local voices and voters. The team will recirculate this content back to these influencers and organizations to boost engagement and reach of the content to key audiences online.

Content Strategy

Content will be both developed inhouse by ACRONYM News Corp's core and state-based editorial team, as well as curated and aggregated on the platform. Content will then be distributed through targeted ads, boosting key pieces to specific audiences each day. Content on the platforms will include longer form feature pieces, digital-first video, infographics, audio clips, gifs and headline-optimized social media posts.

The team will test the ideal frequency to shape opinion among audiences over specific campaigns, and will aim for reaching audiences a minimum of 1x per week per target

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voter independent of partnership campaigns. Over six to twelve months, we plan to increase frequency and volume, climbing to 3x audience contact per week by the summer of 2020 and increasing in frequency until the election. The overall strategy is to create a narrative drip rather than saturate audiences with one-way messaging. Based on partner insights and expert recommendations, we will target certain messages and stories to specific audience segments, including persuasion women, mobilization women with high issue scores on a specific issue or message.

Shared Infrastructure

Following commercial news industry best practices, all technical and data infrastructure will be centralized for increased efficiency. A core technical team is already building out the content management system and associated tools for state-of-the-art digital publishing. Beyond publishing infrastructure, a companion data collection and data analytics toolset is needed to effectively manage ad targeting, audience acquisition and evaluation. We have a beta version of our tracking dashboard up and running using "The Dogwood" as a pilot; see the appendices for an example of the reporting the dashboard product provides. Ultimately the data we collect on our readers and core audience will be enormously valuable for political engagement and persuasion efforts across local, state, and national political campaigns.

EDITORIAL FRAMEWORK

Our Editorial Vision:

- We report on the news + stories that matter most to people's day-to-day lives.
- We cover local, state and national politics + current events through a local and values-driven lens.
- We reach people where they are – both geographically and technologically- to fill the growing local news + information gap.
- We are a news company with an honest point of view. We believe that facts and value-driven storytelling will inform, persuade and mobilize our audience to take meaningful offline action and do not need to rely on lies, misinformation or fear to engage our audience.
- We believe that a strong and healthy democracy is only possible when there is an informed + engaged electorate.

Our media properties will serve as channels to drive strategic national and local narratives year-round as well as in rapid response events. Ultimately, our goal is to inform, persuade and mobilize key audiences to advance progressive causes at the local, state, and national level.

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Our brand is truth. Unlike conservative media companies, ACRONYM News Corp doesn't need to peddle misinformation or lies to create an informed, progressive-leaning electorate. Although we hold a point of view, our point of view will be expressed most in the editorial decisions we make about what stories we choose to cover, and the values through which we frame issues and events, rather than through our branding, salacious, misleading or false storytelling.

Our politics are large but lean progressive. We are Democrats as large as possible and welcome everyone under the big tent within the mainstream and Democratic Party -- with only a few worthy exceptions. (For instance, we're not going to give an anti-choice "Democrat" a platform to make his case.) We view these properties as local forums and levers for other organizations to highlight their issues, supporters, work, actions, impact -- and ultimately amplify content for reach and engagement.

We don't have an inner-party agenda. We will not use these properties to influence primary races. We plan to cover Democratic candidates in as fair and equal a way as possible by providing them a forum to express their ideas and positions in their own words. We do not believe it is our job to influence debates within the broader Democratic party, but rather to provide a platform for elected officials and candidates to reach voters we currently aren't doing a good job of reaching.

REVENUE STRATEGY

In order to build effective media properties that can drive conversation and engagement among key audiences while driving growth and revenue, ACRONYM News Corp has developed a content partnership model that will serve as the company's primary revenue stream in 2019-2020. This model is designed to serve both Democratic organizations and progressive advocacy organizations to advance their strategic objectives in real time. It has the added advantage of strategically redirecting a percentage of churn-and-burn political ad dollars into early and sustained outreach to key voting blocs.

Using our current plans and our pilot property in Virginia, we have begun the process of working to engage mission aligned partners. As of June 15, 2019, we have five interested content partners for Virginia and over 15 additional national progressive partnership prospects for our broader 2020 program work across all states. We are not at liberty to publicize these partner organizations at this time. Partnerships can be forged at either the National level or the State property level depending on the mission of the organization in question.

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Potential partners should view our media properties as trusted local news sources and vehicles to distribute the strategic messages they are most interested in driving to their target audiences. With "The Dogwood" in Virginia as our first localized news property, we are layering experiments and A/B testing across initial narrative content tracks and targeting tactics that will help us to learn more about our core audiences.

In the current media landscape, the only approach that works is constant, rigorous testing and evaluation. Understanding "the social life of information" is a moving target in today's fluid media landscape, and successful digital media operations have an "always-on" constant testing approach.⁷ The Measurement and Analytics Team will be responsible for designing experiments and evaluating what messages, messengers and narratives are most effective at driving voters to shift their opinion and take meaningful offline action. These insights will help us to "fail fast" with strategies and messages that are failing to penetrate, and quickly scale effective strategies across all of our properties.

If successful, this model will help strengthen the ROI of traditional online and offline paid media programs by priming audiences with messaging early. But beyond simply improving performance of existing strategies, it will also build a year-round media infrastructure to drive important messages and respond more rapidly to opposition narratives.

In practice, content partners will retain ACRONYM News Corp as a contractual media vendor, paying the company for program strategy and content development as well as paid media inventory and associated services. For example, a partnership interested in reaching women voters in Virginia with messaging around reproductive rights through "The Dogwood" would pay the media company a creative strategy retainer based on the number of pieces of content "The Dogwood" will develop (based on internal hourly rates required per specific content deliverables), as well as the media costs associated with targeting that audience with boosted posts and digital ads for a set flight or period of time across social channels (contingent on inventory rates and size of media budget).

Additional planned and prospective revenue streams for the company will include traditional digital advertising inventory, sponsored content sales products, podcast and email newsletter sponsorships, merchandising, and productization of proprietary content development tools we may develop over time.

⁷ For additional detail on how major corporate brands have adopted this approach, see "The Ultimate Marketing Machine" by Marc de Swaan Arons, Frank van den Driest, and Keith Weed in the July-August 2014 issue of the Harvard Business Review: <https://hbr.org/2014/07/the-ultimate-marketing-machine>

Between June 2019 through December 2020, our sales targets anticipate \$73.9 million in revenue through content partnerships, of which approximately \$63.6 million is media spending and content costs. We hope to generate an additional \$1-2 million in revenue from ancillary services during that period of time.

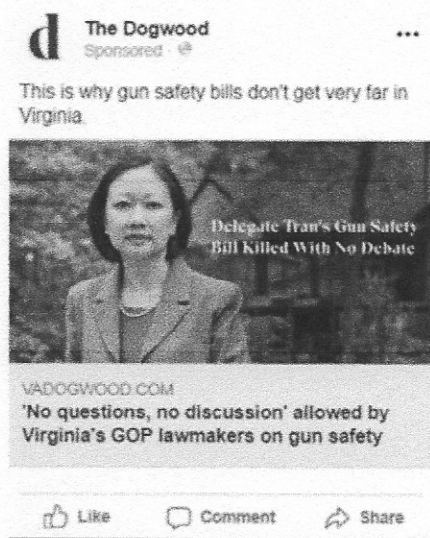
AUDIENCE DEVELOPMENT / ACQUISITION STRATEGY

In addition to content partnerships, ACRONYM News Corp will also aim to build loyal, trusted audiences across each property website and social channel. Audience acquisition will be driven through organic traffic, SEO, social, and digital advertising. We have already started paid acquisition for *"The Dogwood"* to set baseline metrics and establish growth goals. We will continuously optimize these media programs for the most efficient growth and engagement.

Below is an example audience acquisition media plan for "The Dogwood", as well as two sample boosted acquisition Facebook posts for the Virginia property:

Goal	Platform	Ad Format	Budget	Est. Clicks	Est. Follows
Site Traffic	Facebook	News Boost	\$75,500.00	31,000	
Site Traffic	Twitter	News Boost	\$29,000.00	11,500	
Site Traffic	Search	Search Ads	\$5,000.00	3,000	
Acquisition	Facebook	Static & News	\$14,500.00		4,500
Acquisition	Twitter	Text	\$10,000.00		3,000
TOTAL			\$134,000.00	45,500	7,500

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MEASURING IMPACT

ACRONYM News Corp will define and track traditional media business Key Performance Indicators (KPIs) including the below data (see Dogwood Reporting Dashboard in the appendix as well. Beyond industry standard KPIs, we will also measure of the efficacy of our ongoing experiments in communications and distribution programs both on our network of sites and on social media channels.

Traditional KPIs

- Clients
- Active Clients
- Acquisition Cost Per Customer
- Average Revenue Per Customer
- Revenue Growth
- Revenue / Employee

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In order to measure the impact of these properties on specific and broad audiences when it comes to mobilizing offline action, we are building out four main methods to test the political impact of the media properties. First, given large enough audiences, we can utilize YouTube's Brand Lift tool to evaluate the effect on specific questions of interest. While this is a relatively limited instrument, it can help us choose between messages or creative in larger programs with limited time.

Second, in large statewide or national programs we can evaluate our effect using existing survey panels through survey partners like Civiqs and Civi Analytics. These panels do not have the density of respondents to measure effect in smaller geographies or with great precision, but they can provide guidance on the overall effect of large programs. We utilized this method on our initial test of boosted news in the Florida primary election in 2018.

Third, to measure our effect with maximum precision and to build experiment informed programs we can work with a measurement partner such as the Analyst Institute to conduct full randomized controlled trials where we impanel survey respondents through digital ad-to-web or text-to-web methods. This method is costly, but it is invaluable for evaluating the efficacy of programs in highly charged and competitive environments.

Fourth, we are working with an experimental survey partner to develop a real time live environment survey methodology that would allow us to test messages with short turnaround times with high precision and at low cost. This methodology would leverage digital survey collection to increase measurement power and shorten measurement times. If successful, it would be a *game changing advancement* in message and creative testing that would allow us to optimize content to specific targets with significantly increased precision.

CONCLUSION

As of June 15, 2019, we have \$14MN in the pipeline of the total \$74MN we are hoping to raise through the 2020 election cycle. Of that \$74MN, we are aiming to raise \$24.7MN before EOQ4 2019. In 2020, we aim to raise and spend a minimum of \$25 million in content partnership revenue, including from ACRONYM (our parent c4) to reach and mobilize key voting blocs in seven states. We believe deeply that this model will not only have a direct impact on the 2020 elections but that this infrastructure will be critical to the long term success of the progressive movement. This is not just a typical "flash in the pan", fast ramp up and fast decline political play; this is about creating a lasting foundation for getting news and information into voters' hands for years to come. We must build the digital strategy capacity of the movement to be successful over the long haul.

APPENDIX: INTERNAL PLANNING MATERIALS

1. Leadership Team
2. Steering Committee
3. Staffing Structure and Organizational Charts
4. Hiring Timeline
5. State Media Property Launch Timeline
6. Leadership Job Descriptions
7. "The Dogwood" Dashboard - Sample Weekly Report
8. 2019-2020 Operating Budgets

1. Leadership Team

Tara McGowan, founder of ACRONYM, will serve as CEO of ACRONYM News Corp. In addition to Tara, the media company will be led by a Chief Operating Officer, Executive Editor, SVP of Partnerships, SVP of Production and leadership members from both Lockwood Strategy and Shadow Inc, whose bios you will find below.

The Executive Editor will hire and manage (7) State Managing Editors who will manage editorial teams and partnerships in each of their respective states. Job Descriptions for the Chief Operating Officer and Executive Editor can be found in the appendices and we have begun recruiting and interviewing for both positions as of June 1, 2019.

Leadership Team Bios

Tara McGowan, CEO, ACRONYM News Corp

Tara is the founder and CEO of ACRONYM, a nonprofit organization focused on building power and digital infrastructure for the progressive movement. Prior to founding ACRONYM, Tara spent nearly 10 years running and working on groundbreaking digital programs for Democratic organizations and candidates, including Priorities USA, NextGen America, Planned Parenthood and President Obama's re-election campaign in 2012.

Shannon Kowalczyk, CMO, Lockwood Strategy

Shannon most recently came from Pandora where she was the lead for Democratic campaigns and organizations on the ad sales team. Prior to that, she created the Advertising department at Precision Strategies in DC.

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She began her career in politics working on the digital team at the 2012 Obama re-election campaign.

Conor Gaughan, Senior Advisor and acting CFO, Lockwood Strategy

Conor has been leading Lockwood's prolific media team since its inception. He has a deep background in digital media strategy for Democratic campaigns and causes. Prior to working in digital media, Conor spent a decade as an investment banker in the media sector.

Clay Schroers, Political Director, Lockwood Strategy

Clay has over a decade of experience in progressive political campaigns. He managed successful Congressional campaigns in 2010 and 2012 and a winning Senate race in 2014. For the last four years he has been the National Campaigns Director for the League of Conservation Voters.

Kim Peyser, Chief of Staff, Lockwood Strategy

Kim is experienced in program, operations, strategy and team management. Most recently she was COO for When We All Vote and prior to that she served 6 years in the Obama Administration with her final position there being Chief of Staff to the CFO at the Department of Commerce under Secretary Penny Prtizker.

Gerard Niemira, CEO of Shadow, Inc.

Gerard is an experienced product and engineering leader with over 12 years of work in the nonprofit and political sectors. Prior to launching what is now known as Shadow, he led product teams at Hillary for America, where he was Director of Product for the campaign's suite of organizing, events, and major donor fundraising tools.

2. Steering Committee

Managed by the CEO and led by Nicco Mele and Carley Roney (bios below), ACRONYM News Corp's Steering Committee will be divided into two groups:

- The Technology and Data Infrastructure group includes experts on the technical infrastructure of both digital publishing and political targeting.
- The Editorial Strategy and Framework includes experts in the worlds of communications and political strategy. Early committed editorial steering committee members include Drew Westen, Lisa Stone, Jacqueline Hernandez and Michael Dubin.

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Both groups will be convened regularly to provide ideas, feedback to leadership.

Nicco Mele

Nicco Mele is a noted expert on the intersection of technology, journalism, and politics. Currently on the faculty at the Harvard Kennedy School, from 2016 to 2019, Nicco was the Director of the School's the Shorenstein Center on Media, Politics, and Public Policy, where he started new programs focused on understanding misinformation on social networks; sustainable models for local journalism; institutional anti-racism in media and algorithms; and platform accountability. He continues to teach classes on technology's impact on media, politics, and public policy. Nicco's prior experience includes founding technology companies, working on political campaigns, and a stint as a media executive.

Nicco previously served as the Deputy Publisher of the Los Angeles Times and Senior Vice President of Tribune Publishing, where his responsibilities included digital product, content, revenue, and audience development for all of the California News Group's brands, including growing existing digital products and services, identifying possible acquisitions, developing new business opportunities and launching new products. Earlier in his career, Nicco was a political consultant. As webmaster for Governor Howard Dean's 2004 presidential bid, Nicco and the campaign team popularized the use of technology and social media that revolutionized political fundraising and reshaped American politics. He has published widely, including the international bestseller *The End of Big: How The Digital Revolution Makes David The New Goliath* published in 2013 by St. Martin's Press. He lives with his wife, Morra Aarons-Mele, in Massa

Carley Roney

Carley Roney is co-founder of The Knot, America's leading wedding planning marketplace, and one of New York City's most successful media & tech companies. Started in the earliest days of the Web, The Knot has expanded into all media, and now has the #1 wedding apps, registry site, print magazines, book series, planner, and Instagram following—and is used by 8 out of 10 couples in the country.

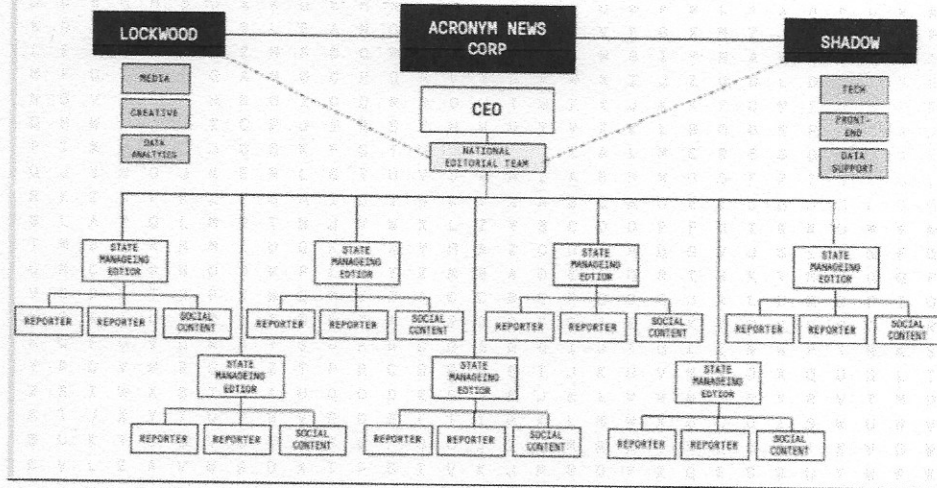
Carley's obsessions, and areas of leadership at The Knot and sister brands, are branding, community, editorial, product design, user experience, public relations, social media, digital marketing and delighting customers while driving business growth. In her relentless quest to make sure every couple in America knew about her brands, Carley became a regular lifestyle contributor on TV shows from Oprah and NBC's TODAY to FOX and LIVE! With Kelly, and published 12 books with Random House.

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Carley is also passionate about entrepreneurship. She advises many female founded startups and has served on Rent The Runway's Board of Directors since inception. Carley speaks at conferences such as SXSW, guest lectures at her alma mater NYU and Columbia University, and has been featured in Inc., Fortune, Vogue, Fast Company, and The New York Times. Most importantly, Carley is mom to three incredible kids, and lives with husband and co-founder David Liu in Brooklyn, NY.

3. Staffing Structure and Organizational Charts

High-level Organizational Structure



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graph TD
    subgraph Lockwood
        Media
        Creative
        DataAnalytics[DATA ANALYTICS]
    end

    subgraph AcronymNewsCorp [ACRONYM NEWS CORP.]
        CEO
        COO[CHIEF OPERATING OFFICER]
        ExecEditor[EXECUTIVE EDITOR]
        SVPProd[SVP PRODUCTION]
        SVPAnalytics[SVP ANALYTICS]
        SVPPartnerships[SVP PARTNERSHIPS]
        SMEd1[STATE MANAGING EDITOR]
        SMEd2[STATE MANAGING EDITOR]
        SMEd3[STATE MANAGING EDITOR]
        SMEd4[STATE MANAGING EDITOR]
        SMEd5[STATE MANAGING EDITOR]
        VideoTeam[VIDEO TEAM (4)]
        DesignTeam[DESIGN TEAM (3)]
    end

    subgraph Shadow
        Tech
        FrontEnd[FRONT-END]
        DataSupport[DATA SUPPORT]
    end

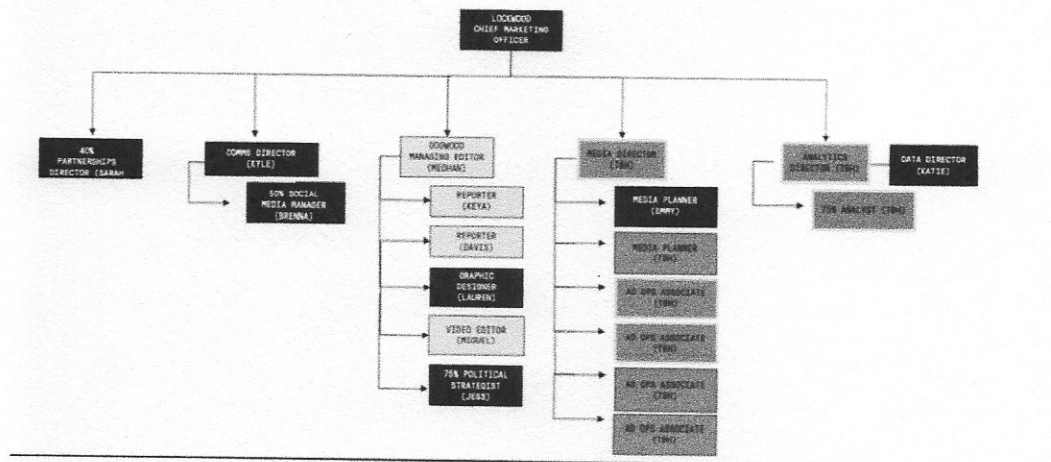
    CEO --- COO
    CEO --- ExecEditor
    CEO --- SVPProd
    CEO --- SVPAnalytics
    CEO --- SVPPartnerships

    SVPProd --- VideoTeam
    SVPProd --- DesignTeam

    ExecEditor --- SMEd1
    ExecEditor --- SMEd2
    ExecEditor --- SMEd3
    ExecEditor --- SMEd4
    ExecEditor --- SMEd5
  
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Given ACRONYM's family organizational structure, the media company will rely on and retain for fair market value a core media, creative production and data/analytics team at Lockwood Strategy to develop and execute ACRONYM News Corps' digital boosting and advertising buying media plans, custom ad production and reporting. In addition, the core Dogwood editorial team currently sits within Lockwood as well, as we leveraged Lockwood team capacity to build the first news property. This team will transition to the media company's payroll before August 2019.

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4. Hiring Timeline

Our priority hires are our Managing Editor and COO (see attached for full job descriptions and see below for Hiring Timeline). These individuals will take in strategic and mission guidance from our CEO, Tara, and turn it into reality. These and the other leadership positions will be based in our DC and NY office spaces and will be charged with seeing the big picture and ensuring an appropriate level of consistency across the state brands. The centralized leadership team will also allow for a clear channel of direction so that, if needed, all of the state properties can react to current events in real time. The state level teams will take their strategic, editorial and implementation guidance from the national organization. Since they will be “on the ground”, they will also be able to apply a true local lens to all content.

At this stage, we are envisioning a core national team of 12 full-time employees and another 28 full-time or contract employees across the seven state teams (with an average of four staff per state). We hope to have completed our full-time hiring no later than November 30, 2019. We will utilize Steering Committee members as well as Lockwood Strategy’s in-house Human Resources team to ensure we recruit exceptional, diverse candidates for all hiring positions.

JULY	AUGUST	SEPTEMBER	OCTOBER	NOVEMBER
MANAGING EDITOR + COO				
AZ + NC MANAGING EDITORS				
SVPS: VIDEO PRODUCTION, MEDIA, MEASUREMENT				
	LEAD DESIGNER + PARTNERSHIPS DIRECTOR			
		VIDEO TEAM		
		STATE TEAMS		
		MEDIA TEAMS		
		MEASUREMENT TEAM		

5. State Media Property Launch Timeline

We estimate it will take between six to ten business weeks to hire, build and launch each state media property following Virginia, which has been live since April 2019. As of June 2019, we have begun the recruitment process for both the national media team as well as State Managing Editors for the next three properties we plan to launch this year.

WK 1	WK 2	WK 3	WK 4	WK 5	WK 6	WK 7	WK 8	WK 9	WK 10
HIRING									
BRAND DEVELOPMENT									
TECH DEVELOPMENT									
EDITORIAL DEVELOPMENT									
LAUNCH									

Looking ahead, we aim to launch properties in Arizona, North Carolina and Pennsylvania no later than September 30, 2019 and the remaining three state properties in Michigan, Wisconsin and Florida no later than EOQ4 2019 pending fundraising.

JUNE	JULY	AUGUST	SEPTEMBER	OCTOBER	NOVEMBER	DECEMBER
VIRGINIA LIVE!						
	ARIZONA		LIVE BY 9/30			
	NORTH CAROLINA		LIVE BY 9/30			
	PENNSYLVANIA		LIVE BY 9/30			
				MICHIGAN		LIVE BY 12/31
				WISCONSIN		LIVE BY 12/31
				FLORIDA		LIVE BY 12/31

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Each development process can be run concurrently, with the major dependency being hiring and talent acquisition. Generally speaking, we expect to have a property up and running within three months of initiating hiring. A “soft launch” to help the editorial team develop a process and style will lead to a “hard launch”, complete with marketing and public relations push, approximately six months after each soft launch. The chief gating factor to standing up multiple properties in parallel is hiring – and given the importance of acquiring the right editorial talent in specific locales, we are carefully evaluating candidates. Our pipeline of potential editorial hires is quite strong and we are interviewing potential candidates on a near-daily basis.

6. Leadership Job Descriptions

EXECUTIVE EDITOR

ACRONYM News Corp is seeking an Executive Editor to build a network of state-based news sites in 7 to 12 targeted geographic areas. These sites will publish original and curated editorial content on a daily basis, covering local, state and national politics and targeted at specific online audience segments. Audience acquisition through organic traffic, SEO, social, and advertising is critical. Editorial products will include email newsletters and potentially other media over time (i.e. podcasts, videos, etc.).

Candidates for this position should possess previous experience developing or curating content for a major website, and/or digital political marketing experience.

The ideal candidate will have deep knowledge of digital politics or news publishing and an acute sense of what constitutes value in a great experience. S/he will have experience activating audiences through digital content and local news reporting, understand the importance of nuance and detail in persuasive storytelling, and have experience deploying it effectively. S/he will have excellent written communication skills and a strong sense of written and verbal style, and will be familiar with audience analytics tools like Google Analytics and other performance tracking methods, and the practical use of the insights they deliver.

The position reports to the COO of ACRONYM News Corp

Responsibilities include but are not limited to:

- Recruit, hire and manage national and state-based editorial teams.
- Work closely with CEO and Message Steering Committee to set the tone, editorial direction and policies across the network of publications, ensuring consistency.
- Develop national content strategy and oversee the development of state content strategy by state managing directors, including editorial calendar with optimal mapping of editorial product to audiences, collaborating with ACRONYM media team on social media segmentation and targeting.
- Work with editorial staff to develop story ideas, assign articles, handle problems, keep the staff on schedule and answer questions from department editors.

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- Set editorial priorities for online promotion and audience acquisition.
- Work closely with the COO and CEO to provide leadership on ensuring balance between mission of company and development and delivery of quality, audience-facing editorial products and audience acquisition, including key activation points, tone and voice.
- Work with COO to develop budget and strategic plan.
- Collaborate with IT/Engineering teams to ensure site development and smooth delivery of content, emails, data, other products internally and externally; lobby and oversee the prioritization of IT tickets to improve reliability and efficiency of internal tools.
- Provide timely reports and collaborative feedback to COO and CEO.

Requirements:

- B.S. or B.A. degree or equivalent in journalism, communications, marketing, or related field.
- 5+ years of experience in digital publishing, news reporting, editing or in digital political marketing or communications, including defining and growing a brand and voice through content.
- Excellent written and verbal communication skills with a strong sense of voice and tone.
- Experience with building an engaged cross-platform audience through content (organic and/or paid).
- Experience with hiring, building, and managing a distributed team.
- Familiarity with performance analytics tools such as Omniture or Google Analytics, and with the process of deriving insights therefrom.
- Strong management, interpersonal skills and ability to work effectively with multidisciplinary stakeholders across the company.
- Ability to manage time and multi-task under tight deadlines.
- A passion for publishing quality news and content in an authentic voice across online + mobile channels.

We offer:

- Competitive salary and benefits
- Medical, Dental and Vision
- Entrepreneurial culture with career development opportunities

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CHIEF OPERATING OFFICER

ACRONYM News Corp is seeking a Chief Operating Officer to build a network of state-based news sites in 7 to 12 targeted geographic areas. These sites will publish original and curated editorial content on a daily basis, covering local, state and national politics and targeted at specific online audience segments. Audience acquisition through organic traffic, SEO, social, and advertising is critical. Editorial products will include email newsletters and potentially other media over time (i.e. podcasts, videos, etc.).

Candidates for this position should possess previous experience developing or curating content for a major website, and/or digital political marketing experience.

The ideal candidate will have deep knowledge of digital politics or news publishing and an acute sense of what constitutes value in a great experience. S/he will have experience activating audiences through digital content and local news reporting, understand the importance of nuance and detail in persuasive storytelling, and have experience deploying it effectively. S/he will have excellent written communication skills and a strong sense of written and verbal style, and will be familiar with audience analytics tools like Google Analytics and other performance tracking methods, and the practical use of the insights they deliver.

Responsibilities include but are not limited to:

- Develop revenue plan and two-year budget for growing 7 to 12 local news websites.
- In consultation with the Executive Editor, recruit, hire and manage national and state-based editorial teams.
- Recruit, hire and manage Senior Partnerships (or Political) Director to develop and manage growing external content partnerships pipeline, scoping, program implementation and reporting
- Recruit, hire and manage core engineering/IT team (FTE and/or contractors)
- Oversee development of technical + data infrastructure, launch plans, reporting milestones and KPIs for each site.
- Develop and oversee implementation of a quarterly and annual learning agenda across media properties and "programs"
- Work closely with Executive Editor and CEO to provide leadership on ensuring balance between mission of company and development and delivery of quality, audience-facing editorial products and audience acquisition, including key activation points, tone and voice.
- Understand audience response patterns—segments, engagement metrics, relative appeal of content types, reactions to different types and patterns of messaging—and use them to inform content development and distribution decisions.
- Work closely with the ACRONYM media team to try new audience acquisition tactics and create opportunities for A/B testing, including developing engaging copy that meets and exceeds brand standards for product marketing.

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- Collaborate with IT/Engineering teams to ensure site development and smooth delivery of content, emails, data, other products internally and externally; lobby and oversee the prioritization of IT tickets to improve reliability and efficiency of internal tools.
- Ideate, assign, and lead collection and roundup initiatives with key stakeholders, including board chair.
- Provide timely reports and collaborative feedback to board chair and other stakeholders.

Requirements:

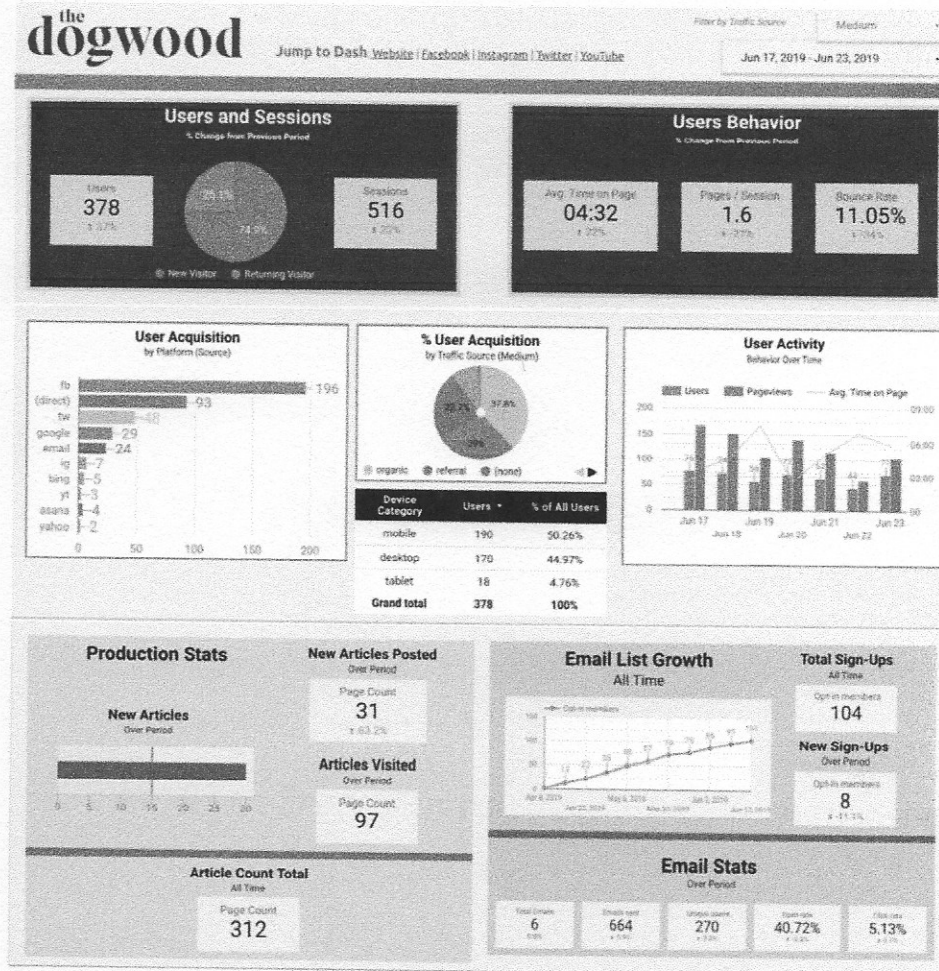
- B.S. or B.A. degree or equivalent in journalism, communications, marketing, or related field.
- 5+ years of experience in digital publishing, or in digital political marketing or communications, including defining and growing a brand through content.
- Excellent written and verbal communication skills with a strong sense of voice and tone.
- Experience with building an engaged cross-platform audience through content (organic and/or paid).
- Experience with hiring, building, and managing a distributed team.
- Familiarity with performance analytics tools such as Omniture or Google Analytics, and with the process of deriving insights therefrom.
- A passion for publishing quality news and content in an authentic voice across online + mobile channels.
- Strong management, interpersonal skills and ability to work effectively with multidisciplinary stakeholders across the company.
- Ability to manage time and multi-task under tight deadlines.

We offer:

- Competitive salary and benefits
- Medical, Dental and Vision
- Entrepreneurial culture with career development opportunities

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7. "The Dogwood" Dashboard - Sample Weekly Report



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8. Detailed Budget

{{ see next pages}}

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