

October 2, 2024

Federal Election Commission
Office of Complaints Examination
& Legal Administration
Attn: Christal Dennis, Paralegal
1050 First Street, NE
Washington, DC 20463

VIA EMAIL

cela@fec.gov

Re: MUR 8318, Supplement to Complaint

Dear Ms. Dennis,

On September 17, 2024, Americans for Public Trust filed a complaint regarding the activities of Patriots Run Project. This letter contains supplemental information relating to this matter based on a new report published by the *Associated Press* (*AP*) on October 1.

Specifically, the *AP* identified approximately an additional \$20,000 in spending in connection with Patriots Run Project's efforts. As the *AP* reports, "the Patriots Run Project nonetheless arranged roughly \$20,000 in donations from Democratic donors to gather the signatures needed to qualify for the ballot, which went to a firm that usually works for Democrats." The candidate for whom the Patriots Run Project expended these funds "said their money paid for signature-gathering efforts by Urban Media LLC, a Milwaukee firm that usually works for Democrats and has done work for Vice President Kamala Harris and Baldwin."¹

The candidate's FEC reports reflect the involvement of Urban Media LLC. The initial July 15 quarterly report disclosed an in-kind contribution from Urban Media LLC in the amount of \$19,800. In a series of memo entries, the Urban Media LLC contribution was attributed to Dora Brooks (\$3,300), Joe Fox (\$3,300), Brigitte Huber (\$3,300), David Steinglass (\$3,300), Richard Thompson (\$3,300), and Srinivasan (\$3,300) as partnership attributions.² The candidate's committee filed an amended July 15 quarterly report that removed Urban Media LLC as the donor and instead attributed the contributions directly to the individuals named above. However, memo text entries still describe each \$3,300 contribution as "In-kind – Signature Gathering For Ballot Access Urban Media LLC."³

The individuals who made in-kind contributions are identified by the *AP* as a "wealthy donor," "a retired private equity fund manager," a "venture capitalist," and a "political consultant." In other words, they do not appear to be partners in Urban Media LLC (as reported on the initial July 15 quarterly report). Based on the *AP*'s reporting, it is likely that the six individuals simply paid Urban Media LLC to conduct signature gathering work. Regardless of whether this transaction was properly disclosed to the Commission, *AP*'s

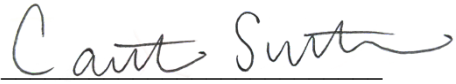
¹ Ryan J. Foley and Brian Slodysko, *Democratic donors prop up far-right candidates including Wisconsin gun activist in Senate race*, Associated Press, Oct. 1, 2024, <https://apnews.com/article/wisconsin-senate-election-democrats-far-right-4e473639f23c257096684d83146d6e1f>.

² See <https://docquery.fec.gov/pdf/316/202407129653151316/202407129653151316.pdf>.

³ See <https://docquery.fec.gov/pdf/427/202407159653521427/202407159653521427.pdf>.

reporting indicates that the Urban Media LLC signature gathering effort was conducted at the behest of Patriots Run Project.

Respectfully Submitted,

A handwritten signature in cursive script that reads "Caitlin Sutherland". The signature is written in black ink and is positioned above a horizontal line.

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