

## Complaint and Request for Investigation of Potential Campaign Finance Law Violation

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### Complaint

This is a Complaint and Request for Investigation into potential campaign finance law violations by or related to a NC registered PAC and/or the campaign of a candidate for state election.

### Candidate

Anita Earls is a candidate in the 2018 election for NC Supreme Court. The candidate's campaign committee is Earls for Justice (SBoE ID STA-12K60N-C-001).

### Complainant

Grass Roots North Carolina (GRNC) is a 501(c)(4) organization dedicated to the protection and advancement of Constitutional and civil liberties.

### Facts

Sara Ullman is a Hollywood filmmaker. A recent *Vogue* article<sup>1</sup> explains her forming an Independent Expenditure PAC (so-called SuperPAC), called One Vote at a Time, which she uses to fund the creation of internet-distributed campaign videos supporting selected candidates for state office. As the article explains:

This is how One Vote at a Time works now since Ullman and her colleagues have perfected their hyper-efficient, millennial-style method: She and a team of four staff members set up a studio in an “activist house” in a chosen state, then they invite the candidates they’re working with to stop by to film their ads. “We’re able to process people through our studio much faster than we would if we were to go on location,” Ullman explains, though they do also venture out to film subjects in their districts. Then there’s a team of seven women, based in Los Angeles, who work on postproduction, finishing up the candidate ads.

According to the Open Secrets website, the One Vote at a Time SuperPAC has raised several hundred thousand dollars in the 2018 election cycle – the vast majority of it from one individual: Hollywood screenwriter Joss Whedon.<sup>2</sup>

The *Vogue* article states Ms. Ullman was in North Carolina in May 2018, filming a campaign ad (“...Ullman recalls via phone from North Carolina, where she was filming another round of ads in May.”). The article indicates that Anita Earls is a recipient of this activism. (“In North Carolina, Ullman is excited about attorney Anita Earls, who is campaigning for a Supreme Court seat after helping to challenge the state’s redistricting laws.”).

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<sup>1</sup> <https://www.vogue.com/article/sarah-ullman-one-vote-at-a-time-gun-reform-super-pac> last visited Oct. 18, 2018. The article is attached hereto as Exhibit 1.

<sup>2</sup> See <https://www.opensecrets.org/pacs/pacgave2.php?cycle=2018&cmte=C00627158> last visited Oct. 18, 2018. This information is attached hereto as Exhibit 2.

The professional, Hollywood-produced campaign video supporting the Earls campaign is available on One Vote at a Time's website. The closing credits in this video state, "Paid for by One Vote at a Time North Carolina and the Earls for Justice Committee."<sup>3</sup>

One Vote at a Time North Carolina ("OVAAT-NC") is a NC-registered PAC (SBoE ID: STA-T7CH9C-C-001). It collected \$44,000 from a fundraiser organized by the One Vote at a Time Victory Fund ("OVAAT-VF", SBoE ID: STA-GUF2J8-C-001), and another \$5,200 from Joss Whedon.<sup>4</sup> OVAAT-VF allocated money from the fundraiser between OVAAT-NC and Ullman's OVAAT SuperPAC such that no contribution to OVAAT-NC exceeded \$5,200.<sup>5</sup>

The Earls for Justice Committee reported an in-kind contribution on June 6, 2018, where Ms. Earles seems to have purchased "Food for Film Crew."<sup>6</sup> No other contribution related to the filming or production of campaign videos has been reported.

OVAAT-NC made three payments in June, totaling \$50,301.49, to Oh Must You? Productions, Inc. of Malibu, CA.<sup>7</sup> This is a California corporation (No. C3682114). The CEO, CFO, and sole director of Oh Must You? Productions is Joss Whedon, the primary funder of OVAAT-Fed,<sup>8</sup> as well as a contributor to the OVAAT-NC.<sup>9</sup>

### Analysis

The campaign ad promoting Anita Earls admits to being jointly funded by OVAAT-NC and the Earls for Justice Campaign Committee. There is no question this is a "coordinated expenditure" within the meaning of N.C. Gen. Stats. § 163A-1411(20). Ms. Earls obviously cooperated in the production of this video – it is essentially an interview of her (and she graciously bought food for the film crew). This necessarily means the video is **not** an "independent expenditure."<sup>10</sup> Since the video is circulated via the Internet and available after Sept. 7, and millions of internet subscribers obtain internet service over cable, the video is also an "electioneering communication."<sup>11</sup>

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<sup>3</sup> See <https://www.onevoteatatime.us/projects/> last visited Oct. 18, 2018. A screenshot of the video's credits is attached hereto as Exhibit 3.

<sup>4</sup> <https://cf.ncsbe.gov/CFOrgLkup/ReportDetail/?RID=157105&TP=REC> last visited Oct. 18, 2018, and attached hereto as Exhibit 4.

<sup>5</sup> <https://cf.ncsbe.gov/CFOrgLkup/ViewDocumentImage/?DID=223412> last visited Oct. 18, 2018. A June 28 explanatory letter from Venable, LLP to NCSBOE, included with this filing, is attached hereto as Exhibit 5.

<sup>6</sup> <https://cf.ncsbe.gov/CFOrgLkup/ReportDetail/?RID=157561&TP=EXP> last visited Oct. 18, 2018, and attached hereto as Exhibit 6.

<sup>7</sup> <https://cf.ncsbe.gov/CFOrgLkup/ReportDetail/?RID=157105&TP=EXP> last visited Oct. 18, 2018, and attached hereto as Exhibit 7.

<sup>8</sup> <https://businesssearch.sos.ca.gov/Document/RetrievePDF?Id=03682114-17949460> last visited Oct. 18, 2018. This is a Statement of Information filed with the California Secretary of State. A copy is attached hereto as Exhibit 8.

<sup>9</sup> *Supra*, at note 4.

<sup>10</sup> N.C. Gen. Stats. § 163A-1411(53).

<sup>11</sup> N.C. Gen. Stats. § 163A-1411(41)

Because the video was unquestionably created in coordination with the candidate, and it supports the election of a clearly identified candidate, it is a “contribution” to the Earls for Justice Campaign Committee under N.C. law.

The terms "contribute" or "contribution" mean any advance, conveyance, deposit, distribution, transfer of funds, loan, payment, gift, pledge or subscription of money or **anything of value whatsoever**, made to, or **in coordination with**, a candidate to support or oppose the nomination or election of one or more clearly identified candidates, to a political committee, to a political party, to an affiliated party committee, or to a referendum committee, whether or not made in an election year.<sup>12</sup>

The maximum contribution a North Carolina PAC may make to a candidate for state office – whether monetary or “in-kind” – is \$5,200.<sup>13</sup> The expenditure by OVAAT-NC, on behalf of the Earls for Justice Campaign Committee, of over \$50,000, is over nine times the legal limit.

Reciprocally, the Earls for Justice Campaign Committee appears to have violated N.C. campaign finance law by accepting the in-kind contribution of a Hollywood-produced video promoting their candidate for state office, the value of which clearly exceeds \$5,200.<sup>14</sup>

Furthermore, it appears both OVAAT-NC and the Earls for Justice Campaign Committee failed to properly report the in-kind contribution.

Still further, it appears that at least OVAAT-NC has failed to comply with the reporting requirements for an “electioneering communication.”<sup>15</sup>

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<sup>12</sup> N.C. Gen. Stats. § 163A-1411(13) (emphasis added).

<sup>13</sup> N.C. Gen. Stats. § 163A-1425(a).

<sup>14</sup> N.C. Gen. Stats. § 163A-1425(c).

<sup>15</sup> N.C. Gen. Stats. § 163A-1424.

Demand

GRNC respectfully requests that the NC State Board of Elections thoroughly investigate the financing, and reporting thereof, of the professional campaign promotion video paid for by OVAAT-NC. Responsive to the investigation, GRNC further respectfully requests that the NC State Board of Elections issue an injunction removing the video from the internet, and impose sanctions, fines, or both against OVAAT-NC, the Earls for Justice Campaign Committee, or both.

Respectfully submitted,



Edward H. Green, III, Esq.  
North Carolina State Bar #26,843  
Attorney for Complainant  
Director of Legal Affairs,  
Grass Roots North Carolina  
PO Box 10665  
Raleigh NC 27605  
[egreen@coatsandbennett.com](mailto:egreen@coatsandbennett.com)  
(919) 854-1844



Verification

Edward H. Green, III, Esq., first being duly sworn, deposes and says that he is the Director of Legal Affairs for Complainant Grass Roots North Carolina, and has the authority to sign this verification on behalf of Grass Roots North Carolina, that he prepared the attached Complaint, and that the facts stated therein are true based upon information which is currently available to Grass Roots North Carolina.



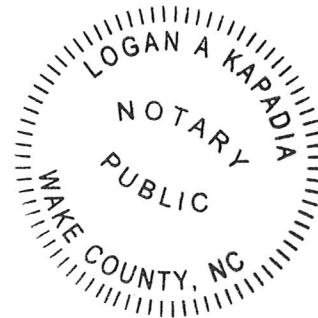
Edward H. Green, III, Esq.

Sworn and subscribed to me,

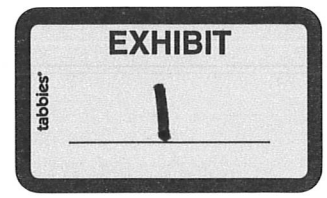
This the 18<sup>th</sup> day of October, 2018



Notary Public



My Commission Expires: May 17<sup>th</sup>, 2022



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CULTURE

# Meet the Young Female Filmmaker With a Gun-Reform Super PAC



JUNE 2, 2018 9:00 AM  
by BRIDGET READ




Photo: Brinson + Banks



What makes Sarah Ullman different from all the other 30-something filmmakers living in Los Angeles's Silver Lake? For one thing, she has a super PAC. If your idea of a mega-fundraising political action committee founder looks more like a Koch or a Mercer, Ullman will surprise you: Petite, with a bob and a penchant for bright lipstick, you might sooner mistake her for a campaign volunteer than an executive director whose political ads helped flip 10 of the 15 seats Democrats gained in the Virginia

VOGUE

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cause: to help elect candidates committed to ending America's gun-violence problem, which, in the wake of the shooting in Parkland, Florida, this year, has become the de coeur of an entire generation. 

Ullman founded her PAC, One Vote at a Time, in 2016, after another notorious mass shooting struck a group of largely young Americans, this time at the Pulse nightclub in Orlando, Florida. While living in Los Angeles, having begun her career as a director just a year before, Ullman was watching Chris Murphy of Connecticut speak in the midst of a 15-hour filibuster on the Senate floor when she realized that she, too, had had enough. Ullman had interned for Murphy, then a Representative from her home district, in 2009, when she was a junior at Tufts University. As a familiar cycle of thoughts and prayers set in, Ullman felt helpless and angry. "I just was tired of feeling that way," she says. She took to her Facebook page, asking her mostly film-industry-related friends and acquaintances, "What if I made campaign ads for people who are supportive of gun safety? Who's with me?"

Four months later, after a lot of paperwork, One Vote at a Time was born. "You have to register as a PAC to make political advertising, and then you're like, 'Fuck, how do I do that?'" Ullman recalls via phone from North Carolina, where she was filming another round of ads in May. In setting up the PAC, she had a little legal help from Joss Whedon, whom she met through a producer friend and who sits on Everytown for Gun Safety's Creative Council. Ullman recruited an entirely female team ("[Some people] asked, 'Can you find a female grip?' And I'm like, *Watch me*") and headed to Nevada, funded mostly by donations from friends and family. There, One Vote made a video supporting a state background-check measure, which passed. "I realized if my video was able to convince 10 people, would be able to convince 100 people, *any* number of people, it will have been worth it, because in that background-check initiative, every vote mattered," Ullman says.



WATCH

## One Chance to Save the Country

It was the vote of confidence she needed to go back to L.A. and crowdfund \$37,000, enough to go to Virginia in 2017, where One Vote made ads for 10 successful candidates, all of whom campaigned on gun-control platforms and helped a blue wave roll through the Virginia state legislature. “It was such a remarkable night,” Ullman remembers, “and knowing that we played a small but important part, especially for the campaigns that were more unlikely to win” convinced her that she had a working model. One Vote’s donated ads were especially helpful for first-time C- and D-tier candidates, who would otherwise not have access to such powerful tools for spreading their message.

This is how One Vote at a Time works now since Ullman and her colleagues have perfected their hyper-efficient, millennial-style method: She and a team of four staff members set up a studio in an “activist house” in a chosen state, then they invite the candidates they’re working with to stop by to film their ads. “We’re able to process people through our studio much faster than we would if we were to go on location,” Ullman explains, though they do also venture out to film subjects in their districts.

treatment that I would give any clients in L.A.” In addition to the donated time and of the best film equipment, she continues, they also benefit from One Vote’s “expertise in helping them shape their message and figure out how to translate what they already are talking about or what they already know into video.” Though Ullman takes on some freelance projects, One Vote at a Time is what she has been “living and breathing” for almost two years now.

The PAC focuses on candidates at the state level because its organizers believe that’s where gun reform has the most potential. State legislature is “a real battleground, and there are huge opportunities for big gains in states like North Carolina, which has just had its district lines redrawn because of a racial gerrymandering case,” says Ullman. In deciding what makes a pro-gun-safety platform in each state, the organization speaks to political consultants, talks to the candidates, and considers the policy landscape to get a better understanding (in North Carolina, for example, the governor has proposed tighter regulation that bans bump stocks, raises the age to purchase assault rifles to 21, and requires universal background checks). As for the rest of a candidate’s profile, there isn’t exactly a checklist with other progressive stances they have to take in order to receive One Vote’s support, but something Ullman won’t compromise on is that they must be pro-choice. As she says, with an all-female PAC, “ain’t nobody got time for antichoice Democrats, if we’re super-real about it.”



WATCH

## Stacey Abrams and Edana Walker

In 2018, One Vote has signed on to work with 250 candidates in 10 states, one of whom is already a major success story: Stacey Abrams, who is running for governor in Georgia and the first-ever black woman gubernatorial candidate with the nomination of a major party in United States history. (You can check out one of the videos that One Vote made for Abrams below.) In North Carolina, Ullman is excited about attorney Anita Earls, who is campaigning for a Supreme Court seat after helping to challenge the state's redistricting laws. As the country gears up for primary season, it's hard not to feel optimistic when listening to Ullman excitedly speak about the ads she'll be making and rebuke anyone who would doubt that young people have the wherewithal to actually end America's long, ugly relationship with guns—her work ethic is contagious. When asked if she worries about burning out, she says, "The only thing that keeps me sane right now is knowing that I will be able to look back at this time and know that I did everything I could possibly do. Like, I am doing everything that I have in my capacity, every tool I have in my toolbox I am using right now, to make a difference."

About

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# One Vote at a Time

- [Summary](#)
- [Donors](#)
- [Expenditures](#)
- [PAC to PAC/Party](#)
- [Independent Expenditures](#)

## Contributors, 2018 cycle

Select a Cycle:

Individual donors gave 42 large (\$200+) contributions to this PAC in 2017-2018.

| Contrib                          | Occupation   | Date     | Amount   |
|----------------------------------|--------------|----------|----------|
| WHEDON, JOSS<br>MALIBU, CA 90265 | SCREENWRITER | 06/04/18 | \$60,000 |
| WHEDON, JOSS<br>MALIBU, CA 90265 | SCREENWRITER | 03/15/18 | \$50,000 |
| WHEDON, JOSS<br>MALIBU, CA 90265 | SCREENWRITER | 01/26/18 | \$50,000 |
| WHEDON, JOSS<br>MALIBU, CA 90265 | SCREENWRITER | 04/02/18 | \$50,000 |
| WHEDON, JOSS<br>MALIBU, CA 90265 | SCREENWRITER | 05/23/18 | \$40,000 |
| WHEDON, JOSS<br>MALIBU, CA 90265 | Screenwriter | 08/24/18 | \$30,000 |
| WHEDON, JOSS<br>MALIBU, CA 90265 | SCREENWRITER | 07/11/18 | \$30,000 |



|   |                                  |                   |
|---|----------------------------------|-------------------|
| WHEDON, JOSS<br>MALIBU, CA 90265              | SCREENWRITER                     | 07/19/18 \$30,000 |
| WHEDON, JOSS<br>MALIBU, CA 90265              | Screenwriter                     | 08/17/18 \$24,469 |
| WHEDON, JOSS<br>MALIBU, CA 90265              | SCREENWRITER                     | 03/01/18 \$20,000 |
| WHEDON, JOSS<br>MALIBU, CA 90265              | SCREENWRITER                     | 07/09/18 \$15,000 |
| WHEDON, JOSS<br>MALIBU, CA 90265              | SCREENWRITER                     | 07/06/17 \$10,000 |
| BESSIN, LINDA<br>BURBANK, CA 91505            | UNEMPLOYED                       | 10/05/17 \$8,450  |
| DISNEY, ABIGAIL E<br>BURBANK, CA 91505        | FILM MAKER                       | 07/09/18 \$3,700  |
| ORECK, CHARLOTTE D<br>BOUDLER, CO 80304       | UNEMPLOYED                       | 07/29/18 \$2,500  |
| HOUGHTELING, NATE<br>SAN FRANCISCO, CA 94110  | Portal A                         | 08/09/18 \$2,500  |
| CHEEVER, CHARLIE<br>PALO ALTO, CA 94301       | Expo                             | 08/09/18 \$2,500  |
| CONWAY, RONALD<br>SAN FRANCISCO, CA 94103     | SV Angel LLC                     | 08/22/18 \$2,000  |
| HALL, DEIDRE<br>SANTA MONICA, CA 90403        | NBC                              | 08/15/18 \$1,000  |
| CURRAN, BRIAN<br>UNIVERSAL CITY, CA 91608     | HISTORIC PRESERVATION CONSULTANT | 07/06/17 \$1,000  |
| BESSIN, LINDA<br>BURBANK, CA 91505            | UNEMPLOYED                       | 07/08/17 \$1,000  |
| ULLMAN, PETER<br>SIMSBURY,, CT 06070          | TIDAL ELECTRIC                   | 07/06/17 \$1,000  |
| KEITH, SERENA<br>SAN FRANCISCO, CA 94110      | Me360                            | 08/09/18 \$1,000  |
| ISAACSON, JULIE<br>HIGHLAND PARK, IL 60035    | RETIRED                          | 07/06/17 \$500    |
| GRANT, ANDREA<br>BOULDER, CO 80301            | ENVIRONMENTAL COMM. ASSOCIATES   | 07/24/18 \$500    |
| CLURMAN, CAROL<br>WASHINGTON, DC 20008        | Editor                           | 08/10/18 \$500    |
| WILLIAMS, CHRIS<br>BEVERLY HILLS, CA 90210    | CEO                              | 07/07/17 \$500    |
| DEMOCRACY ENGINE, LLC<br>WASHINGTON, DC 20009 |                                  | 06/28/18 \$435    |
| KAMINSKY, DANIEL<br>LOS ANGELES, CA 90010     | CROWN CITY PICTURES, INC.        | 07/06/17 \$390    |
| HOUGHTELING, BOB<br>OAKLAND, CA 94618         | Bay Area Teacher Training Inst   | 08/10/18 \$375    |
| FISHEL, ELIZABETH<br>OAKLAND, CA 94618        | Writer                           | 08/10/18 \$375    |
| MORRIS, MONICA                                | MCV PHYSICIANS                   | 07/07/17 \$261    |

|  |                       |                |
|--|-----------------------|----------------|
| RICHMOND, VA 23219                         |                       |                |
| SIEVERS, ERIN<br>LINCOLN, ND 68510         | UNEMPLOYED            | 10/20/17 \$250 |
| TOLAND, BLAIR<br>BOSTON, MA 02118          | TALL GUY WOODWORKING  | 07/06/17 \$250 |
| KORDESTANI, GISEL<br>PALO ALTO, CA 94301   | CROWDPAC, INC.        | 07/07/17 \$250 |
| GOODKIN, GWEN<br>CHARLOTTESVILLE, VA 22901 | NOT-EMPLOYED          | 07/24/17 \$250 |
| WHITCOMB, EMILY<br>CHARLOTTE, TN 37036     | AVALON HEALTHCARE LLC | 07/07/17 \$250 |
| WHITCOMB, VALERIE<br>CHARLOTTE, TN 37036   | AVALON FARM           | 07/07/17 \$250 |
| JACOBS, ALEX<br>SAN FRANCISCO, CA 94123    | Marketing             | 08/17/18 \$250 |
| DALY, CHRISTOPHER<br>NEWTON, MA 02461      | Boston University     | 08/13/18 \$250 |
| HOFFMAN, MICHAEL<br>BROOKLYN, NY 11215     | Software Engineer     | 08/10/18 \$250 |
| CLURMAN, EMMA<br>BRIDGHEHAMPTON, NY 11932  | Saunders & Associates | 08/10/18 \$250 |

METHODOLOGY: The numbers on this page are based on contributions from individuals giving \$200 or more, as reported to the Federal Election Commission.

NOTE: All the numbers on this page are for the 2018 election cycle and based on Federal Election Commission data released on September 24, 2018.

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# North Carolina

1/26  Anita Earls for Supreme Court   Watch later Share





# ANITA EARLS



*for* NC SUPREME COURT

**Paid for by One Vote at a Time North Carolina  
and Earls for Justice Committee.**

**MORE VIDEOS**

tabbles

EXHIBIT

3

# Political Committee Disclosure Report

[Export data to .CSV](#)

## RECEIPTS

| Date       | Is Prior | Name Of Contributor And Complete Mailing Address   | Receipt Type                        | Purpose Descri... | Account Code | Form Of Payment           | Amount Of Receipt | Sum To Date |
|------------|----------|--|-------------------------------------|-------------------|--------------|---------------------------|-------------------|-------------|
| 05/09/2... |          | LINDA BESSIN<br>BOARD OF TRUSTEES<br>BURBANK PUBLIC LIBRARY<br>741 N. CLYBOURN AVENUE<br>BURBANK, CA 91505 | Individual Contrib...               |                   | 1            | Check                     | \$500.00          | \$500.00    |
| 06/13/2... |          | ONE VOTE AT A TIME VICTORY<br>FUND<br>PO BOX 39528<br>LOS ANGELES, CA 90039                                | Other Political Commi... Contrib... |                   | 1            | Electro... Funds Transfer | \$43,49...        | \$43,49...  |
| 04/30/2... |          | UMB BANK, N.A.<br>1010 GRAND BLVD.<br>KANSAS CITY, MO 64106  | Interest Earned                     |                   | 1            | Electro... Funds Transfer | \$0.40            | \$2.42      |
| 05/31/2... |          | UMB BANK, N.A.<br>1010 GRAND BLVD.<br>KANSAS CITY, MO 64106  | Interest Earned                     |                   | 1            | Electro... Funds Transfer | \$0.80            | \$2.42      |
| 06/29/2... |          | UMB BANK, N.A.<br>1010 GRAND BLVD.<br>KANSAS CITY, MO 64106  | Interest Earned                     |                   | 1            | Electro... Funds Transfer | \$1.22            | \$2.42      |
| 05/11/2... |          | Joss Whedon<br>Screenwriter<br>Self-Employed<br>P.O. Box 988<br>Malibu, CA 90265                           | Individual Contrib...               |                   | 1            | Check                     | \$5,200...        | \$5,200...  |



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June 28, 2018

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mkmcocoy@venable.comvia Federal Express and E-MailNorth Carolina State Board of Elections  
Attn: Sheryll Harris  
430 N. Salisbury St.  
Third Floor  
Raleigh, NC 27603-5918

STATE BOARD OF ELECTIONS

JUN 29 2018

Re: One Vote at a Time Victory Fund

Dear Ms. Harris,

Please find enclosed the organizational report for One Vote at a Time Victory Fund ("OVAAT-VF"), a joint fundraising committee for which we filed a Statement of Organization dated May 22, 2018. We note that we have not yet received confirmation of registration or an identification number for the committee; however, we are filing this report at your request to facilitate processing of the registration.

To memorialize our phone calls on June 22, 2018, OVAAT-VF is a joint fundraising account set up to collect the proceeds of a fundraiser held on May 23, 2018, which raised money for two separate entities: (1) One Vote at a Time North Carolina ("OVAAT-NC"), a state political committee registered with the North Carolina Board of Elections ("NCSBE"); and (2) One Vote at a Time (OVAAT-Federal), a federal independent expenditure-only political committee registered with the Federal Election Commission.<sup>1</sup> OVAAT-VF, OVAAT-NC, and OVAAT-Federal each have separate bank accounts. The joint fundraising account was intended to allow fundraiser attendees to write a single check for the event, rather than separate checks for each committee.

All contributions made in connection with the fundraiser were deposited in the OVAAT-VF bank account and reallocated to OVAAT-NC and OVAAT-Federal according to the pre-determined formula indicated on OVAAT-VF's Statement of Organization. Under this formula, the first \$5,200 of an individual's contribution was allocated to OVAAT-NC and any amount in excess of \$5,200 was allocated to OVAAT-Federal.<sup>2</sup> Information about how donations would be allocated was communicated to donors at the time of their contributions. Further, OVAAT-VF kept records of donor information to ensure that no contribution exceeding North Carolina's contribution limits was allocated to OVAAT-NC.

The enclosed report discloses all contributions that OVAAT-VF received for the fundraiser as of June 1, 2018, ten days after its organization on May 22, 2018. Several additional contributions were received after June 1, 2018 and those contributions will be reported on OVAAT-VF's report due July 16, 2018. As of June 1, 2018, the fundraiser raised \$103,942.05.

<sup>1</sup> OVAAT-Federal does not solicit or receive contributions or make expenditures for the purpose of influencing North Carolina elections.

<sup>2</sup> Under federal law, OVAAT-Federal is permitted to accept unlimited contributions from individuals.

North Carolina State Board of Elections  
June 26, 2018  
Page 2

STATE BOARD OF ELECTIONS

JUN 29 2018

All but one individual contributed \$5,200 or less; therefore, pursuant to the allocation formula, these contributions were allocated as OVAAT-NC's gross proceeds. Contributions of \$5,200 or less totaled \$43,942.05 as of June 1, 2018. As of June 1, 2018, OVAAT-VF had not transferred these proceeds to OVAAT-NC, but that transfer did occur shortly thereafter. Accordingly, both OVAAT-VF and OVAAT-NC will report this transfer on their respective reports due July 16, 2018. Based on guidance we received from NCSBE prior to the fundraiser and apparent practices of other North Carolina joint fundraisers, it is our intention to have OVAAT-VF report this transfer as a lump-sum disbursement to OVAAT-NC, and for OVAAT-NC to report the lump-sum receipt from OVAAT-VF.

The one contribution over \$5,200 totaled \$60,000. The donor who made this contribution had previously given the maximum contribution to OVAAT-NC, but wanted to support the event and OVAAT-Federal, so contributed to OVAAT-VF with the understanding that OVAAT-VF would allocate 100% of his contribution to OVAAT-Federal, so as not to exceed the North Carolina contribution limits. Accordingly, on May 29, 2018, OVAAT-VF transferred the entire \$60,000 to OVAAT-Federal. The enclosed report shows the contribution to OVAAT-VF, as well as the transfer to OVAAT-Federal. In accordance with federal reporting requirements for joint fundraisers, OVAAT-VF's acceptance of the contribution and, its subsequent transfer of the money to OVAAT-Federal were also recently reported to the FEC.<sup>3</sup>

Finally, the enclosed report shows that OVAAT-VF has a debt of \$29,000, representing costs associated with the fundraiser. As of June 1, 2018, these costs had not been paid; however, they were paid by OVAAT-NC and OVAAT-Federal shortly thereafter and will be reflected on OVAAT-NC and OVAAT-VF's NCSBE reports due July 16, 2018. To ensure that neither committee paid expenses on behalf of the other, OVAAT-NC and OVAAT-Federal split the outstanding costs in proportion to the gross proceeds they each earned from the fundraiser. OVAAT-Federal and OVAAT-VF will also report these payments to the FEC on the federal reports due July 20, 2018.

It is our hope that the enclosed report will clear up confusion about the joint fundraising arrangement, which was intended to comply fully with applicable federal and state law. Please do not hesitate to contact me if I can answer any other questions.

Sincerely,



Meredith K. McCoy

<sup>3</sup> See 11 C.F.R. § 102.17(c)(8). Reports filed by OVAAT-Federal and OVAAT-VF are available on the FEC's website.

| Date      | Name Of Payee And Complete Mailing Address  | Expendit... Type         | Purpose                | In-Kind Description    | Account Code | Form Of Payment | Amount Of Expendit... | Sum To Date |
|-----------|---|--------------------------|------------------------|------------------------|--------------|-----------------|-----------------------|-------------|
| 05/01/... | Anita S. Earls<br>Attorney<br>6 Superior Ct<br>Durham, NC 27713-8683                    | In-Kind<br>Contributi... |                        | Parking<br>Chapel Hill |              |                 | \$2.50                | \$9,959.07  |
| 05/31/... | Anita S. Earls<br>Attorney<br>Self<br>6 Superior Ct<br>Durham, NC 27713-8683            | In-Kind<br>Contributi... |                        | Candidate<br>Mileage   |              |                 | \$1,235.35            | \$9,959.07  |
| 06/06/... | Anita S. Earls<br>Attorney<br>Self<br>6 Superior Ct<br>Durham, NC 27713-8683            | In-Kind<br>Contributi... |                        | Food for<br>Film Crew  |              |                 | \$85.60               | \$9,959.07  |
| 06/30/... | Anita S. Earls<br>Attorney<br>Self<br>6 Superior Ct<br>Durham, NC 27713-8683            | In-Kind<br>Contributi... |                        | Candidate<br>Mileage   |              |                 | \$1,225.11            | \$9,959.07  |
| 04/16/... | Embassy Suites Atlanta Buckhead<br>3285 Peachtree Rd NE<br>Atlanta, GA 30305-2420       | Operating<br>Expense     | Hotel Room<br>and Meal |                        | 01           | Debit Card      | \$296.30              | \$296.30    |
| 03/12/... | Embassy Suites Wilmington<br>Riverfront<br>9 Estell Lee Pl<br>Wilmington, NC 28401-3360 | Operating<br>Expense     | Lodging                |                        | 01           | Debit Card      | \$360.47              | \$360.47    |
| 01/09/... | Facebook<br>1 Hacker Way<br>Menlo Park, CA 94025-1456                                   | Operating<br>Expense     | Online<br>Advertising  |                        | 01           | Debit Card      | \$50.00               | \$299.00    |

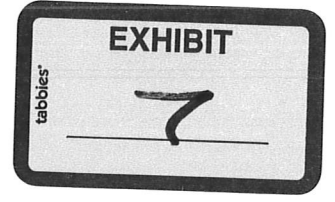


# Political Committee Disclosure Report

[Export data to .CSV](#)

## EXPENDITURES

| Date      | Name Of Payee And Complete Mailing Address                         | Expendit... Type  | Purpose  | In-Kind Description | Account Code | Form Of Payment           | Amount Of Expendit... | Sum To Date |
|-----------|--|-------------------|--|---------------------|--------------|---------------------------|-----------------------|-------------|
| 06/13/... | Oh Must You? Productions, Inc.<br>P.O. Box 988<br>Malibu, CA 90265 | Operating Expense | PAYMENT OF Allocated JFC Fundraising Expense... Photogra... Services,... | 1                   |              | Electronic Funds Transfer | \$12,180.00           | \$50,301.49 |
| 06/19/... | Oh Must You? Productions, Inc.<br>P.O. Box 988<br>Malibu, CA 90265 | Operating Expense | MEDIA PRODUC...  | 1                   |              | Electronic Funds Transfer | \$36,221.49           | \$50,301.49 |
| 06/28/... | Oh Must You? Productions, Inc.<br>P.O. Box 988<br>Malibu, CA 90265 | Operating Expense | MEDIA PRODUC... COST   | 1                   |              | Electronic Funds Transfer | \$1,900.00            | \$50,301.49 |
|           |  |                   |  |                     |              |                           | \$50,301.49           |             |







State of California Secretary of State

118

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Statement of Information

(Domestic Stock and Agricultural Cooperative Corporations)

FEES (Filing and Disclosure): \$25.00.

If this is an amendment, see instructions.

IMPORTANT - READ INSTRUCTIONS BEFORE COMPLETING THIS FORM



FILED Secretary of State State of California

JUN 23 2014

1. CORPORATE NAME OH MUST YOU? PRODUCTIONS, INC.

2. CALIFORNIA CORPORATE NUMBER C3682114

26/25/PC This Space for Filing Use Only

No Change Statement (Not applicable if agent address of record is a P.O. Box address. See instructions.) 3. If there have been any changes to the information contained in the last Statement of Information filed with the California Secretary of State, or no statement of information has been previously filed, this form must be completed in its entirety. [ ] If there has been no change in any of the information contained in the last Statement of Information filed with the California Secretary of State, check the box and proceed to Item 17.

Complete Addresses for the Following (Do not abbreviate the name of the city. Items 4 and 5 cannot be P.O. Boxes.) 4. STREET ADDRESS OF PRINCIPAL EXECUTIVE OFFICE CITY STATE ZIP CODE 21609 Pacific Coast Highway Malibu CA 90265 5. STREET ADDRESS OF PRINCIPAL BUSINESS OFFICE IN CALIFORNIA, IF ANY CITY STATE ZIP CODE 21609 Pacific Coast Highway Malibu CA 90265 6. MAILING ADDRESS OF CORPORATION, IF DIFFERENT THAN ITEM 4 CITY STATE ZIP CODE P.O. Box 988 Malibu CA 90265

Names and Complete Addresses of the Following Officers (The corporation must list these three officers. A comparable title for the specific officer may be added; however, the preprinted titles on this form must not be altered.) 7. CHIEF EXECUTIVE OFFICER/ ADDRESS CITY STATE ZIP CODE Joss Whedon 21609 Pacific Coast Highway Malibu CA 90265 8. SECRETARY ADDRESS CITY STATE ZIP CODE Joel Landson 21609 Pacific Coast Highway Malibu CA 90265 9. CHIEF FINANCIAL OFFICER/ ADDRESS CITY STATE ZIP CODE Joss Whedon 21609 Pacific Coast Highway Malibu CA 90265

Names and Complete Addresses of All Directors, Including Directors Who are Also Officers (The corporation must have at least one director. Attach additional pages, if necessary.) 10. NAME ADDRESS CITY STATE ZIP CODE Joss Whedon 21609 Pacific Coast Highway Malibu CA 90265 11. NAME ADDRESS CITY STATE ZIP CODE 12. NAME ADDRESS CITY STATE ZIP CODE

13. NUMBER OF VACANCIES ON THE BOARD OF DIRECTORS, IF ANY:

Agent for Service of Process If the agent is an individual, the agent must reside in California and Item 15 must be completed with a California street address, a P.O. Box address is not acceptable. If the agent is another corporation, the agent must have on file with the California Secretary of State a certificate pursuant to California Corporations Code section 1505 and Item 15 must be left blank.

14. NAME OF AGENT FOR SERVICE OF PROCESS Joel Landson 15. STREET ADDRESS OF AGENT FOR SERVICE OF PROCESS IN CALIFORNIA, IF AN INDIVIDUAL CITY STATE ZIP CODE 21609 Pacific Coast Highway Malibu CA 90265

Type of Business

16. DESCRIBE THE TYPE OF BUSINESS OF THE CORPORATION entertainment

17. BY SUBMITTING THIS STATEMENT OF INFORMATION TO THE CALIFORNIA SECRETARY OF STATE, THE CORPORATION CERTIFIES THE INFORMATION CONTAINED HEREIN, INCLUDING ANY ATTACHMENTS, IS TRUE AND CORRECT.

06/18/2014 Joss Whedon President DATE TYPE/PRINT NAME OF PERSON COMPLETING FORM TITLE SIGNATURE