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NAME OF COMMITTEE (In Full)
COMMUNITY CHANGE VOTERS

FEC IDENTIFICATION NUMBER
C00612820

Mailing Address 1536 U STREET NW

City State ZIP Code
WASHINGTON DC 20009

Harmon, Curran, Spielberg & Eisenberg, LLP
1725 DeSales Street NW, Suite 500
Washington, DC 20036

March 15, 2021

Clyde Hinton, Sr. Campaign Finance Analyst, Reports Analysis Division
Federal Election Commission
1050 First Street, NE
Washington, DC 20463
ELECTRONICALLY FILED

RE: Community Change Voters, Committee ID: C00612820;
2/9/2021 RFAI regarding 30 Day Post-General Report, Filed 12/3/2020

Dear Mr. Hinton,

I am writing as counsel to Community Change Voters (the Committee) in response to the Commissions February 9, 2020 request for additional information (RFAI) related to the 30 Day Post-General Report filed by the Committee on December 3, 2020.

As indicated in the RFAI and the attachment, the Committee did fail to timely report certain independent expenditures in support of Joseph R. Biden, Jaime Harrison, and Rafael Warnock. Each of these was inadvertent and were subsequently corrected in amended reports filed by the Committee. The Committee also has taken steps to determine how these errors occurred and to prevent such errors in the future.

The bulk of the expenditures listed on the attachment relate to digital advertisements that began running on October 15 or October 16 but that, due to related internal communications errors occurring on or around those dates, were not reported until October 22 (in most cases) or until December 1 (in one case):

The entries on Lines 1 and 8 of the attachment reflect the cost of digital ads that were launched on the Committees behalf by BoulderStrategies, LLC on October 15, 2020 and ran through November 3, 2020. On Schedule B of its October Quarterly Report, the Committee had reported a September 25, 2020 purchase of \$75,000 in digital advertising, which the Committee accurately described as a prepayment for future operating and independent expenditures. When a portion of that larger ad buy was used to run the independent expenditures supporting Biden and Warnock beginning on October 15, 2020, that fact was not promptly and properly communicated within the Committee, resulting in the delayed reporting of those expenditures. The Committee disclosed the independent expenditures on an amended 24-hour report filed on October 22, 2020 and on its Post-General Report.

The in-kind expenditures reflected in the entries on Lines 2, 5, and 7 are for the value of the licenses obtained by the Committee to use video content developed by Way to Lead PAC and Citizen Engagement Laboratory, respectively, on digital advertisements purchased by the Committee through its vendors BoulderStrategies, LLC and Do Big Things, LLC. The dissemination dates reflect the dates on which the advertisements containing the licensed content began running. Due to the same miscommunications error described above surrounding the ads themselves, these in-kinds initially went unreported until being disclosed by the Committee on an amended 24-hour report filed on October 22, 2020 and on its Post-General Report.

The entry on Line 6 reflects the cost of digital ads that were launched on the Committees behalf by Do Big Things, LLC on October 15, 2020 and ran through November 3, 2020. On a 48-hour report filed on October 9, 2020 (and on its original Pre-General Report), the Committee had disclosed an \$810,000 purchase of digital ads from Do Big Things, LLC that began

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running on October 9, 2020. At the time of that report, the Committee expected the entirety of the ad buy to be spent on ads exclusively supporting Biden and, accordingly, reported the entire purchase as an independent expenditure for Biden. Subsequently, those plans changed, and on or around October 16, 2020 a decision was made for this vendor to run digital ads supporting Harrison using \$150,000 of the \$810,000 previously paid to Do Big Things, LLC, and such ads began running on that date. Unfortunately, the fact of this change (and thus, the inaccuracy of the Committees previous disclosure of this purchase) was not then effectively communicated within the Committee, and the Harrison expenditure went unreported until such time as the Committee prepared to file its Post-General Report. On December 1, the Committee filed an amendment to its Pre-General Report to correct the reported expenditure in support of Biden on Schedule E from \$810,000 to \$660,000, with the remaining \$150,000 spent in support of Harrison; the Committee also filed an amended 48-hour report reflecting that change.

The other two expenditures listed on the attachment reflect amounts spent on digital phone and text messaging services by Community Change Action in connection with phonebanks supporting Biden conducted on behalf of the Committee. These costs were incurred in error and went unnoticed and unreported by the Committee until such time as it was preparing its Post-General Report.

Recognizing that the reporting delays detailed above resulted from deficiencies in the Committees internal communications in relation to these digital activities, the Committee has already identified those deficiencies and taken steps to improve its processes to ensure timely and accurate communication of information about independent expenditure activity in the future.

I believe that this letter and the amended reports filed previously fully address the concerns raised in the above-referenced RFAI. If you have any further questions, please feel free to contact me at 202-328-3500.

Very truly yours,
/s/ Richard Eisenberg
Counsel to Community Change Voters