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NAME OF COMMITTEE (In Full)  
Majority Forward

FEC IDENTIFICATION NUMBER  
C90016098

Mailing Address 700 13th Street NW  
Suite 600

City State ZIP Code  
Washington DC 20005

July 31, 2019

Vicki Davis  
Senior Campaign Finance Analyst  
Reports Analysis Division  
Federal Election Commission  
1050 First Street, N.E.  
Washington, DC 20002

Re: Majority Forward  
FEC Identification # C90016098

Dear Ms. Davis:

The purpose of this supplemental response is to respond to your questions regarding the 2018 October Quarterly Report of Majority Forward, the above referenced organization (the "Organization").

1. You asked about the fact that no contributions were disclosed on Line 6, "Total Contributions." On October 4, 2018, the Federal Election Commission (the "Commission") issued guidance regarding filing obligations of organizations that make independent expenditures pursuant to CREW v. FEC, 316 F. Supp. 3d 349, 389 (D.D.C. 2018). The Commission noted that reports due after September 18, 2018 must include the identification of each person other than a political committee "who made a contribution or contributions" in an aggregate amount in excess of \$200. The term "contribution" is a defined one by statute and as interpreted by the courts. The Commission noted that the court in CREW v. FEC required the "disclosure of donors of over \$200 annually making contributions earmarked for political purposes," and that category included but was not limited to donors who contribute "for the purpose of furthering an independent expenditure." The court in CREW v. FEC made clear that the phrase "earmarked for political purposes" applies only to funds earmarked for political purposes "in connection with a federal election" or "to influence any election for federal elections." (See CREW, 316 F. Supp. 3d at 372, 395).

The Organization did not accept any contributions that are earmarked for federal political purposes, including, but not limited to, the making of independent expenditures. Therefore, the Organization has received no contributions as defined by CREW v. FEC or by the Commissions' subsequent policy guidance. As a result, the Organization has no donors to report on Form 5.

2. You also ask about independent expenditures that disseminated on 9/14/2018. The media buy you reference was actually originally disclosed on a 48-hour notice filed on 9/13/18 under Waterfront Strategies in the amount of \$424,275, marked as opposing Martha McSally with a dissemination date of 9/11/18. Unfortunately, our media vendor failed to notify us that there had actually been two advertisements that this media buy had funded, one for the advertisement opposing Martha McSally and the other for an advertisement supporting Krysten Sinema that disseminated on 9/14/18. When we learned about this fact, we amended the 48-hour notice filed on 9/13/2018 to reduce the total media buy to the reflected amount that funded the advertisement opposing McSally and amended the 48-hour noticed filed on 9/16/18 to disclose the total that funded the advertisement supporting Sinema, along with the additional associated media production costs. As a result, the total amount paid to Waterfront Strategies for the media buy for both ads had been fully disclosed on 9/13/18 but, because a second advertisement aired with a later dissemination date and supporting a different candidate, the committee felt it should correct the disclosure on the public records to accurately reflect the spending.

Please let us know if you require any additional information.

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Sincerely yours,

Rachel Jacobs  
Counsel