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NAME OF COMMITTEE (In Full)
SHERIFF DAVID CLARKE FOR U.S. SENATE (OFFICIAL DRAFT
CAMPAIGN)

FEC IDENTIFICATION NUMBER
C00631382

Mailing Address P.O. BOX 4749

City State ZIP Code
PINEHURST NC 28374

The absence of PAC administration salaries and traditional consultant fees is not an oversight, but attributable primarily to the volunteered and uncompensated services of numerous citizens, especially those of Committee Treasurer Jack Daly, who volunteered 863.75 hours fulfilling these and other functions through June 30th. In general, the services provided by volunteers are not "contributions" within the meaning of the relevant sections of the Code of Federal Regulations.

Unlike volunteer services, the Treasurer's decision to waive the rental fees for the Committee's use of his direct mail list (over 4,400 documents mailed) and his large email list (44,167,522 messages sent) rendered the committee's use of those lists a series of "in-kind contributions," each of which is REQUIRED to be reported. The fair market valuation reflected in the semi-annual report is identical to the lists' actual rental fees advertised on all list brokers' rate cards. On the advice of multiple attorneys, FEC employees, and the FEC's own published guidance (<https://transition.fec.gov/rad/parties/documents/PartyCampaignGuideP75In-kindContributionscropped.pdf>), these in-kind contributions from the Treasurer were listed as both contributions AND disbursements, even though no actual disbursement was ever made to the Treasurer in connection with these in-kind, list rental contributions.

Please note that the connections, relations, and general intercourse between this Committee and Sheriff David A. Clarke, Jr. that may be memorialized in or suggested by the semi-annual report DO NOT constitute prohibited coordination within the contemplation of the federal regulations, as the Sheriff was not a declared candidate for federal elective office at any relevant time. Although the Sheriff does have his own Federal PAC (The People's Sheriff; C00576371), that committee is an Independent Expenditure-Only Political Committee (Super PAC). To be specific, the Sheriff's Super PAC is NOT a hybrid committee, a principal campaign committee, a committee authorized by a candidate, a multicandidate committee, a leadership PAC, or even a "testing the waters" committee. The prohibition on coordination was thus not in play for this committee vis a vis Sheriff Clarke.

No personal appearance, meeting, telephone conversation, text, or email between the Sheriff or his agents and one or more representatives of the Committee was therefor prohibited, irrespective of whether the Sheriff or others acting on his behalf made suggestions for the expenditure of Committee funds, or offered strategy that was adopted by the Committee. This is true irrespective of the expenditure in question, whether that be: (1) the \$20,000.00 in billboard advertising in Milwaukee arranged through the Sheriff's former campaign manager; (2) the significant sums expended for email sends and digital advertising that caused Committee supporters to purchase several thousand copies of the Sheriff's book through Amazon; (3) the \$16,000.00 expended for professional polling to determine the feasibility of a Clarke candidacy for one of Wisconsin's two U.S. Senate seats; (4) the significant sums expended to commission commemorative artwork of the Sheriff's person, irrespective of whether the Sheriff himself may have been among those who took steps to secure copies of such commissioned artwork for himself and others; (5) the significant sums expended to underwrite the costs of the reception in the Sheriff's honor at the Gaylord Hotel in the greater Washington, D.C. area in February; and, (6) any potential contributions from this Committee to The People's Sheriff PAC in the reporting period that covers July 1st through December 31st.