

THE CENTER FOR MEDIA AND DEMOCRACY
520 University Ave., Suite 305, Madison, WI 53703 | 608-260-9713

August 5, 2022

2022 AUG -9 P 2:36

Jeffrey A. Mangan
Commissioner of Political Practices
Of the State of Montana
P.O. Box 202401
1209 8th Ave.
Helena, MT 59620

Dear Mr. Mangan,

I am writing to file the attached complaint against the Richard A. Johnson, Conservative Action for America, and Convention of States Political Fund for knowingly making and receiving illegal straw-donor contributions in violation of M.C.A. § 13-37-217.

It is our contention that Mr. Johnson registered Conservative Action for America with the Arizona Corporations Commission using a fake address for the sole purpose of acting as an intermediary to funnel money to Convention of States Political Fund, and thereby conceal the true identity of the donor or donors from your office. The Convention of States Political Fund has to date spent at least \$126,764 on independent expenditures to influence the outcome of 2022 legislative races in Montana.

Please do not hesitate to contact me if you have any questions or would like additional information.

Thank you for your time and consideration on this important matter.

Sincerely,



Arn H. Pearson, Esq.
Executive Director

THE CENTER FOR MEDIA AND DEMOCRACY

520 University Ave., Suite 305, Madison, WI 53703 | 608-260-9713

Straw-Donor Complaint Against Richard A. Johnson, Conservative Action for America, and Convention of States Political Fund

Complainant

Arn Pearson. Esq.
Executive Director
Center for Media and Democracy
25 Arrowhead Drive
Brunswick, ME 04011

Respondents

Richard A. Johnson
Johnson & Jordahl, LLC
N7130 N Lost Lake Road
Randolph, WI 53956

Conservative Action for America
4600 E. Washington, Suite 300
Phoenix, AZ 85034

Convention of States Political Fund
500 New Jersey Ave., NW, Suite 375
Washington, DC 20001

Statement of Facts

1. On Feb. 17, 2022, Richard A. Johnson registered a new super PAC, the Convention of States Political Fund (CSPF), with the Internal Revenue Service, using a Washington, D.C. address. (Ex. 1)
2. Two days later, on Feb. 19, Mr. Johnson registered and filed articles of incorporation for a new 501(c)(4) organization in Arizona called Conservative Action for America (CAA). (Exs. 2 and 3)
3. Mr. Johnson is the sole director of CAA, the organization has no stated purpose other than to parrot the public welfare statutory language for 501(c)(4)s, and it has no website or other public presence.

4. Mr. Johnson provided a fake address to the Arizona Corporations Commission for CAA: 4800 East Washington St., Suite 300, Phoenix, AZ 85034. That address is a “virtual office address” available for rent at \$59 per month from a firm called Davinci. (Ex. 4)
5. CAA has no actual office or operations in Arizona.
6. The D.C. address Mr. Johnson used for CSPF, 500 New Jersey Ave., NW, Suite 375, is the address for the law firm, Godfrey & Kahn, that responded to a prior complaint to your office concerning CSPF, Dailey v. CSPF, No. COPP 2022-CFP-011.
7. Mr. Johnson does not reside in Phoenix or D.C.; he lives and works in Wisconsin, where he runs a political consulting firm. See <https://johnsonjordahl.com/about/>; https://opencorporates.com/companies/us_wi/J024898.
8. Between Apr. 11 and July 19, CAA contributed \$356,000 to the Convention of States Political Fund, almost half of the super PAC’s reported cumulative revenues to date. (Ex. 5)
9. CSPF has spent \$126,765 on independent expenditures in Montana so far this year to influence the outcome of four legislative primary contests.
10. CAA’s only other known activity has been to contribute \$51,000 to another super PAC, Conservative Action for Idaho, less than a week after Mr. Johnson registered it with the IRS on April 19 using the same address he provided for CSPF. CAA has to date provided that super PAC with 45% of its revenues. The remainder of Conservative Action for Idaho’s funds (\$63,359) have come from CSPF. All three entities are controlled by Mr. Johnson. (See <https://sunshine.sos.idaho.gov/?campaigns%5B0%5D%5Bvalue%5D=2519> and Ex. 6)
11. Mr. Johnson is an expert at creating dark money networks and was a key target in the bipartisan John Doe criminal investigation into illegal coordination and other campaign finance practices in Wisconsin following former Gov. Scot Walker’s recall and reelection campaigns. (See, e.g., <https://www.prwatch.org/news/2019/02/13447/how-scott-walker-made-wisconsin-national-poster-child-dark-money-corruption>)

Applicable Law

Montana law prohibits the use of an intermediary to pass funds used to influence an election from a third party as a means of concealing the identity of the true donor.

Under M.C.A. § 13-37-217, a person may not make or receive a contribution “in connection with an election in any other name than that of the person who in truth supplies the money.”

Alleged Violation and Request for Investigation

The facts laid out above strongly suggest that Mr. Johnson created Conservative Action for America to serve as a straw donor for the Convention of States Political Fund in order to make independent expenditures in Montana in violation of M.C.A. § 13-37-217. Both entities are operated under the sole control of Mr. Johnson.

The Center for Media and Democracy respectfully requests that the Office of the Commissioner of Political Practices investigate this matter and take all appropriate enforcement action.

Verification by Oath or Affirmation

State of Maine, County of Cumberland

I, Arn H. Pearson, being duly sworn, state that the information in this Complaint is complete, true, and correct, to the best of my knowledge and belief.

Arn H. Pearson
Signature of Complainant

Subscribed and sworn to before me on this 5th
day of August, 2022

Carol B. Haskell
Notary Public

My Commission Expires:

Carol B. Haskell
Notary Public, State of Maine
My Commission Expires July 20, 2025

1901, 1899
1900, 1898
1902, 1900, 1897, 1896

Form **8871**

(Rev. July 2003)

Department of the Treasury
Internal Revenue Service

**Political Organization
Notice of Section 527 Status**

Ex. 1

OMB No. 1545-1003

Part I General Information

1 Name of organization

Convention of States Political Fund

Employer identification number

88 - 0753126

2 Mailing address (P.O. box or number, street, and room or suite number)

500 New Jersey Ave NW Suite 375

City or town, state, and ZIP code

Washington, DC 20001

3 Check applicable box:

☒ Initial notice

☐ Amended notice

☐ Final notice

4a Date established

02/17/2022

4b Date of material change

02/17/2022

5 E-mail address of organization

COSPoliticalFund@gmail.com

6a Name of custodian of records

Richard A. Johnson

6b Custodian's address

500 New Jersey Ave NW Suite 375

Washington, DC 20001

7a Name of contact person

Richard A. Johnson

7b Contact person's address

500 New Jersey Ave NW Suite 375

Washington, DC 20001

8 Business address of organization (if different from mailing address shown above). Number, street, and room or suite number

500 New Jersey Ave NW Suite 375

City or town, state, and ZIP code

Washington, DC 20001

9a Election authority

NONE

9b Election authority identification number

Part II Notification of Claim of Exemption From Filing Certain Forms (see instructions)

10a Is this organization claiming exemption from filing Form 8872, Political Organization Report of Contributions and Expenditures, as a qualified state or local political organization? Yes ☐ No ☒

10b If 'Yes,' list the state where the organization files reports:

11 Is this organization claiming exemption from filing Form 990 (or 990-EZ), Return of Organization Exempt from Income Tax, as a caucus or associations of state or local officials? Yes ☐ No ☒

Part III Purpose

12 Describe the purpose of the organization

To influence elections

Part IV List of All Related Entities (see instructions)

13 Check if the organization has no related entities

..... ✓

14a Name of related entity

14b Relationship

14c Address

Part V List of All Officers, Directors, and Highly Compensated Employees (see instructions)

15a Name

15b Title

15c Address

Richard A. Johnson

Treasurer

500 New Jersey Ave NW Suite 375

Washington, DC 20001

Under penalties of perjury, I declare that the organization named in Part I is to be treated as a tax-exempt organization described in section 527 of the Internal Revenue Code, and that I have examined this notice, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. I further declare that I am the official authorized to sign this report, and I am signing by entering my name below.

Richard A. Johnson

02/17/2022

**Sign
Here**

Name of authorized official

Date

Ex. 2

ENTITY INFORMATION**Search Date and Time: 6/28/2022 11:34:25 AM****Entity Details****Entity Name:**

CONSERVATIVE ACTION FOR AMERICA, INC.

Entity ID:

23322616

Entity Type:

Domestic Nonprofit Corporation

Entity Status:**Active****Formation Date:**

1/19/2022

Reason for Status:

In Good Standing

Approval Date:

2/7/2022

Status Date:

1/19/2022

Original Incorporation Date:

1/19/2022

Life Period:

Perpetual

Business Type:

To promote social welfare within the meaning of Code section 501(c)(4), including but not limited to: advocating for public policies that promote the common good and general welfare of the people of the community

Last Annual Report Filed:**Domicile State:**

Arizona

Annual Report Due Date:

1/19/2023

Years Due:

Privacy Policy (<http://azcc.gov/privacy-policy>) | Contact Us (<http://azcc.gov/corporations/corporation-contacts>)

Original Publish Date:

Statutory Agent Information**Name:**

C T Corporation System

Appointed Status:

Active 2/7/2022

Attention:**Address:**

3800 N Central Ave Ste 460, PHOENIX, AZ 85012, USA

Agent Last Updated:

2/7/2022

E-mail:**Attention:****Mailing Address:****County:**

Maricopa

Principal Information

Title	Name	Attention	Address	Date of Taking Office	Last Updated
Director	Richard A. Johnson		4600 E. Washington, Suite 300, PHOENIX, AZ, 85034, Maricopa County, USA	1/19/2022	2/7/2022

Page 1 of 1, records 1 to 1 of 1

Address**Attention:** Conservative Action for America**Address:** 4600 E. Washington, Suite 300, PHOENIX, AZ, 85034, USA**County:** Maricopa**Last Updated:** 2/7/2022Privacy Policy (<http://azcc.gov/privacy-policy>) | Contact Us (<http://azcc.gov/corporations/corporation-contacts>)

Entity Principal Office Address

Attention:

Address:

County:

Last Updated:

Back

Return to Search

Return to Results

Document History

Name/Restructuring History

Pending Documents

Microfilm History

ARTICLES OF INCORPORATION

NON-PROFIT CORPORATION

ENTITY INFORMATION

ENTITY NAME: CONSERVATIVE ACTION FOR AMERICA, INC.
ENTITY ID: 23322616
ENTITY TYPE: Domestic Nonprofit Corporation
EFFECTIVE DATE: 01/19/2022
CHARACTER OF BUSINESS: To promote social welfare within the meaning of Code section 501(c)(4), including but not limited to: advocating for public policies that promote the common good and general welfare of the people of the community
CORPORATION WILL HAVE MEMBERS: NO
CORPORATION WILL NOT HAVE MEMBERS: YES

STATUTORY AGENT INFORMATION

STATUTORY AGENT NAME: C T Corporation System
PHYSICAL ADDRESS: 3800 N Central Ave Ste 460, PHOENIX, AZ 85012
MAILING ADDRESS:

KNOWN PLACE OF BUSINESS

Att: Conservative Action for America, 4600 E. Washington, Suite 300, PHOENIX, AZ 85034

PRINCIPAL INFORMATION

Director: Richard A. Johnson - 4600 E. Washington, Suite 300, PHOENIX, AZ, 85034, USA - rj@rjjohnson.org -
Date of Taking Office: 01/19/2022
Incorporator: G&K Wisconsin Services, LLC - One East Main Street, Suite 500, P.O. Box 2719, MADISON, WI, 53701, USA - - Date of Taking Office:

CERTIFICATE OF DISCLOSURE

FELONY JUDGEMENT QUESTIONS:

Has any person (a) who is currently an officer, director, trustee, or incorporator, or (b) who controls or holds over ten per cent of the issued and outstanding common shares or ten percent of any other proprietary, beneficial or membership interest in the corporation been:

Convicted of a felony involving a transaction in securities, consumer fraud or antitrust in any state or federal jurisdiction within the seven-year period immediately preceding the signing of this certificate? NO

Convicted of a felony, the essential elements of which consisted of fraud, misrepresentation, theft by false pretenses or restraint of trade or monopoly in any state or federal jurisdiction within the seven-year period immediately preceding the signing of this certificate? NO

Subject to an injunction, judgment, decree or permanent order of any state or federal court entered within the seven-year period immediately preceding the signing of this certificate, NO

involving any of the following:

- The violation of fraud or registration provisions of the securities laws of that jurisdiction;
- The violation of the consumer fraud laws of that jurisdiction;
- The violation of the antitrust or restraint of trade laws of that jurisdiction?

BANKRUPTCY QUESTION:

Has any person (a) who is currently an officer, director, trustee, incorporator, or (b) who controls or holds over twenty per cent of the issued and outstanding common shares or twenty per cent of any other proprietary, beneficial or membership interest in the corporation, served in any such capacity or held a twenty per cent interest in *any other corporation* (not the one filing this Certificate) on the bankruptcy or receivership *of the other corporation*? NO

SIGNATURE

Incorporator: Kieran Coe (G&K Wisconsin Services, LLC) - 02/03/2022

**ARTICLES OF INCORPORATION
OF
CONSERVATIVE ACTION FOR AMERICA, INC.**

For the purpose of forming a corporation under the Arizona Nonprofit Corporation Act, Title 10, Chapters 24-40 of the Arizona Revised Statutes, the undersigned executes the following Articles of Incorporation.

**ARTICLE 1
NAME**

The name of the Corporation is Conservative Action for America, Inc. hereinafter referred to as the "Corporation."

**ARTICLE 2
EXISTENCE**

The Corporation is created as an Arizona nonprofit corporation under Title 10, Chapters 24-40 of the Arizona Revised Statutes. The period of the Corporation's existence is perpetual.

**ARTICLE 3
PURPOSES**

3.1 The Corporation is organized and shall be operated to promote social welfare within the meaning of Code section 501(c)(4), including but not limited to: advocating for public policies that promote the common good and general welfare of the people of the community.

3.2 The Corporation is not organized for profit, and no part of the net earnings of this corporation shall inure to the benefit of any member of the Board of Directors or any other individual except that the Corporation may make payments of reasonable compensation for services rendered.

3.3 The Corporation shall not participate or intervene in any political campaign on behalf of, or in opposition to, any candidate for public office to an extent that would disqualify it from tax exemption under Code section 501(c)(4). The Corporation shall never be operated for the primary purpose of carrying on a trade or business for profit.

3.4 Notwithstanding any provision of these Articles of Incorporation, this Corporation shall not carry on any activities not permitted to be carried on by an organization exempt from federal income tax under Code section 501(c)(4).

ARTICLE 4 **POWERS**

The Corporation has all powers now or in the future given by law to nonprofit corporations organized under the laws of Arizona, provided however that such powers may be exercised only to further the purposes stated in Article 3 above, and further provided that no part of the net earnings of the Corporation shall inure to the benefit of, or be distributable to its directors, officers or other private persons, except that the Corporation is authorized and empowered to pay reasonable compensation for services rendered and to make payments and distributions in furtherance of the purposes set forth in Article 3 above.

ARTICLE 5 **MEMBERSHIP**

The Corporation shall not have members.

ARTICLE 6 **BOARD OF DIRECTORS**

The affairs of the Corporation shall be managed by a Board of Directors. The initial director on the Board of Directors shall be Richard A. Johnson. The method of electing successor directors of the Corporation shall be as stated in the bylaws of the Corporation. The number of directors shall be fixed by the bylaws of the Corporation.

ARTICLE 7 **DISTRIBUTIONS**

The corporation may make distributions or other payments permitted under Section 10-11302 of the Arizona Revised Statutes, as may be amended from time to time, to the extent consistent with its purposes as set out in Article 3, above. Such distributions may include distributions to other organizations that are tax exempt under Code Section 501(c).

ARTICLE 8 **DISSOLUTION**

Upon the dissolution of the Corporation, the Board of Directors shall, after paying or making provisions for the payment of all of the liabilities of the Corporation, dispose of all of the assets of the Corporation to one or more organizations that are tax exempt under Code section 501(c)(3) or 501(c)(4). Any such assets not so disposed of shall be disposed of by the Circuit Court for the County in which the principal office of the Corporation is located to one or more organizations that are tax exempt under Code section 501(c)(3) or 501(c)(4), as designated by said court.

ARTICLE 9
STATUTORY/REGISTERED AGENT AND KNOWN PLACE OF BUSINESS

9.1 The name and address of the statutory/registered agent is:

C T Corporation System
 3800 N. Central Avenue, Suite 460
 Phoenix, AZ 85012

9.2 The street address of the known place of business for the Corporation is:

Conservative Action for America, Inc.
 4600 E. Washington, Suite 300
 Phoenix, AZ 85034

AMENDMENT

These articles may be amended in the manner authorized by law at the time of the amendment.

ARTICLE 10
CODE REFERENCES

All references herein to sections of the "Code" shall be considered to be references to the Internal Revenue Code of 1986, as from time to time amended, to the corresponding provisions of any similar law subsequently enacted and to all regulations issued under such sections and provisions.

ARTICLE 11
DIRECTORS

Richard A. Johnson

ARTICLE 12
INCORPORATOR

The name and address of the incorporator is:

G&K Wisconsin Services, LLC
 One East Main Street, Suite 500
 P. O. Box 2719
 Madison, WI 53701-2719

Executed this 2nd day of February 2022.

This instrument was drafted by:
Kieran Coe
c/o Godfrey & Kahn, S.C.
One East Main Street, Suite 500
P. O. Box 2719
Madison, WI 53701-2719

26583457.2

G&K WISCONSIN SERVICES, LLC

By: Kie Coe
Kieran Coe, Assistant Secretary



DO NOT WRITE ABOVE THIS LINE; RESERVED FOR ACC USE ONLY.

STATUTORY AGENT ACCEPTANCE

Please read Instructions M0021

1. **ENTITY NAME** – give the **exact** name in Arizona of the corporation or LLC that has appointed the Statutory Agent (this must match exactly the name as listed on the document appointing the statutory agent, e.g., Articles of Organization or Article of Incorporation):

C T Corporation System

2. **STATUTORY AGENT NAME** – give the exact name of the Statutory Agent appointed by the entity listed in number 1 above (this will be *either* an individual or an entity). **NOTE** - the name must match **exactly** the statutory agent name as listed in the document that appoints the statutory agent (e.g. Articles of Incorporation or Articles of Organization), including any middle initial or suffix:

3. STATUTORY AGENT SIGNATURE:

By the signature appearing below, the individual or entity named in number 2 above accepts the appointment as statutory agent for the entity named in number 1 above, and acknowledges that the appointment is effective until the appointing entity replaces the statutory agent or the statutory agent resigns, whichever occurs first.

The person signing below declares and certifies *under penalty of perjury* that the information contained within this document together with any attachments is true and correct, and is submitted in compliance with Arizona law.

Scott White, Assistant Secretary

Signature

Printed Name

Date

REQUIRED – check only one:

☐ **Individual as statutory agent:** I am signing on behalf of myself as the individual (natural person) named as statutory agent.

☒ **Entity as statutory agent:** I am signing on behalf of the entity named as statutory agent, and I am authorized to act for that entity.

Filing Fee: none (regular processing)
Expedited processing – not applicable.
All fees are nonrefundable – see Instructions.

Mail: Arizona Corporation Commission - Corporate Filings Section
1300 W. Washington St., Phoenix, Arizona 85007
Fax: 602-542-4100

Please be advised that A.C.C. forms reflect only the **minimum** provisions required by statute. You should seek private legal counsel for those matters that may pertain to the individual needs of your business.

All documents filed with the Arizona Corporation Commission are **public record** and are open for public inspection.
If you have questions after reading the Instructions, please call 602-542-3026 or (within Arizona only) 800-345-5819.



Reserve your virtual office address at Washington at Sky Harbor

4600 East Washington Street

Suite 300

Phoenix, AZ 85034

Regus - Arizona, Phoenix - Washington at Sky Harbor

Personal Mailbox # Assigned & Required

Minimum 6 month term applies

New Low Rate!

4600 East Washington Street

Promo: **\$59**/mo

\$199 \$150 One-time Setup Fee

Select this Location

Or call a product expert at [1-877-419-1651](tel:1-877-419-1651)

[View more offices in Phoenix](#)

Virtual Office Features Available Add-ons



Local professional business address



Use of address for business cards, website, etc.



Includes 1 complimentary online notary to complete required US Postal Form 1583



Mail Receipt



Mail forwarding (additional fee)



Lobby greeter to welcome your walk-in clients



Lobby Directory Listing (where available, additional fee)



Access to network of over 5000 meeting spaces worldwide (pricing may vary by location)



Business support center (additional fee)



Private day offices – rates vary by location



Conference rooms – rates vary by location

New Low Rate!

[1-877-419-1651](tel:1-877-419-1651)

Promo: **\$59**/mo

\$199 \$150 One-time Setup Fee

Select this Location

Chariti P.

Great customer service! I really have enjoyed working with Davinci's team and I feel confident I've made the right choice in virtual office spaces.

1/5

Chariti P.

Great customer service! I really have enjoyed working with Davinci's team and I feel confident I've made the right choice in virtual office spaces.

**Brittney**

My company has been looking to expand in other states and some states require a physical address in order to do business there. Davinci has made it extremely easy to set up a physical address to use!

Mayra K.

Amazing platform for small businesses in New York City. The fast response to every communication is the key for Davinci's success in my opinion. Thanks for a great service to the small business community.

Bob

I just got set up with virtual office services, and it was incredibly fast and easy. I didn't even need to leave my home office to get any of it done

New Low Rate!

1-877-419-1651

Promo: **\$59**/mo**\$199** \$150 One-time Setup Fee

Select this location

They did exactly what I expected. Both the staff at the corporate office and the staff at the virtual office in CA were great to work with. I would use them again.

[More reviews →](#)

Frequently Asked Questions

Question:

What is the cost to use the conference room(s) at your Phoenix, AZ virtual office site?

Answer:

We offer over 1500 virtual office locations. The prices vary by location. Please contact Davinci Virtual Customer Care or you can go online to DavinciMeetingRooms.com to check rates at specific meeting & conference facilities.

Question:

What are the main features included for Phoenix, AZ Location Services?

Answer:

- Professional business address
- Mail & package receipt, dedicated locking mail box on site in most locations
- Mail forwarding on request (daily, weekly, or monthly) cost of postage additional
- Use of address for business license, business cards, website, etc.
- Local presence & drop off & pick up point for clientele
- Lobby & directory listings available for \$25 per month at most locations
- Access to private day offices & conference rooms at hourly rates (\$25+)
- Complimentary access to cyber café's with wireless internet, coffee/tea bar, etc. where available

[Ask a question →](#) [See more frequently asked questions →](#)



About this Location

Find a new base for your business at the edge of two vibrant neighbourhoods on the Phoenix-Tempe Gateway. 4600 East Washington is just moments from major highways| with the airport only minutes away| making it a central place to work and meet.

This executive workspace benefits from plenty of natural light| thanks to the unique wraparound floor-to-ceiling windows. Discover the beauty and culture of this part of the city at nearby golf courses| botanical gardens and museums.

[Schedule a tour →](#)

Top Virtual Offices in Arizona

New Low Rate!

1-877-419-1651

Promo: **\$59/mo**

~~\$199~~ \$150 One-time Setup Fee

[Select this Location](#)

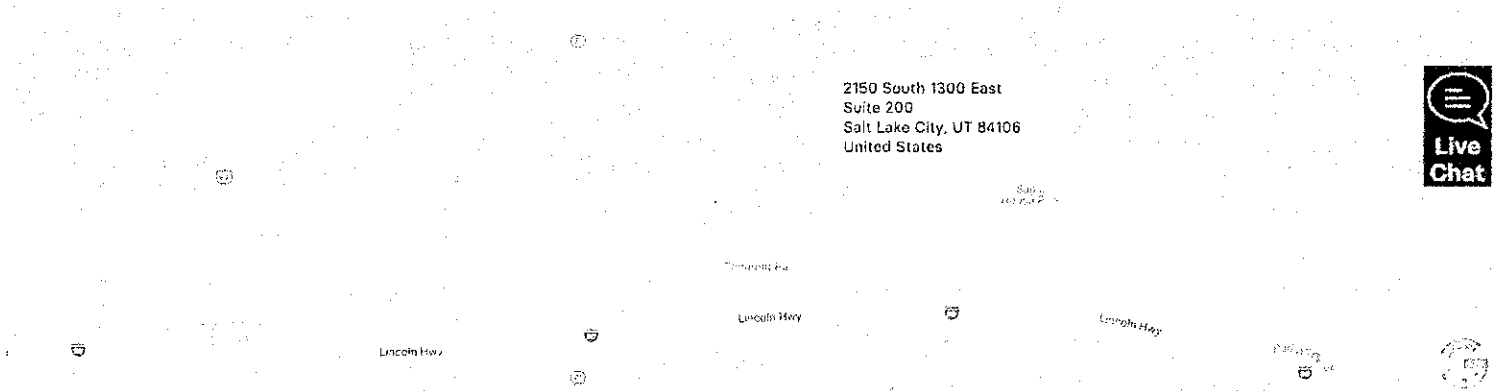
Cities nearby: [Chandler](#) [Gilbert](#) [Mesa](#) [Oro Valley](#) [Peoria](#) [Phoenix](#) [Scottsdale](#) [Surprise](#) [Tempe](#) [Tucson](#) [Show All \(10\)](#)

[See all of our listings in Arizona →](#)

Start a new search

Find your virtual office

[Search](#)



New Low Rate!

1-877-419-1651

Promo: **\$59/mo**

\$199 \$150 One-time Setup Fee

[Select this location](#)

Cook, Scott

From: Conover, Parker <PConover@gklaw.com>
Sent: Wednesday, July 20, 2022 2:19 PM
To: Cook, Scott
Cc: MacNaughton, Jaime; Mangan, Jeff
Subject: [EXTERNAL] RE: Nonresident Report Submission [GK-Active.FID3183942]
Attachments: CSPF_ MI Q2 Report _ MT Filing [filed].PDF

Scott,

Find attached our MI Statement of Organization and MI Q2 report. To ensure receipt, we've also faxed and sent this via FedEx.

Please let me know if you have any questions or would like to discuss.

Thanks,

Parker Conover | Attorney
 608.284.2624 direct | pconover@gklaw.com

GODFREY KAHN gklaw.com

This is a transmission from the law firm of Godfrey & Kahn, S.C. and may contain information which is privileged, confidential, and protected by the attorney-client or attorney work product privileges. If you are not the addressee, note that any disclosure, copying, distribution, or use of the contents of this message is prohibited. If you have received this transmission in error, please destroy it and notify us immediately at (414) 273-3500.

From: Cook, Scott <SCook3@mt.gov>
Sent: Wednesday, July 20, 2022 12:04 PM
To: Conover, Parker <PConover@gklaw.com>
Cc: MacNaughton, Jaime <JMacNaughton@mt.gov>; Mangan, Jeff <Jeff.Mangan@mt.gov>
Subject: RE: Nonresident Report Submission [GK-Active.FID3183942]

[EXTERNAL] This message originated from outside your domain.

Parker,

Thanks for reaching out. Best practice would be to provide a hard copy version of the report to COPP at the time of filing, as a PDF or similar document. Submission via fax (our fax number is 406-444-1643) or via mail (mailing address is 1209 8th Ave., Helena, MT 59601) would also be accepted.

Scott Cook
 Compliance Specialist
 Office of the Commissioner of Political Practices
 (406) 444-4627
SCook3@mt.gov

From: MacNaughton, Jaime <JMacNaughton@mt.gov>
Sent: Wednesday, July 20, 2022 10:44 AM



Ruth Johnson, Secretary of State Department of State

(<http://www.michigan.gov/sos/0,1607,7-127---,00.html>)

Michigan Committee Statement of Organization

The documents sent and received listing for this committee is at the bottom of the screen.

Jump to the documents on file

Committee ID#:	520433
Type of Filing:	Original
Full name of committee:	CONVENTION OF STATES POLITICAL FUND (SUPERPAC)
Committee Type:	Political PAC
Acronym:	
Name of Sponsor/Type:	
Segregated Fund:	No
Date Committee Was Formed:	02/22/2022
Committee Phone Number:	(602) 935-9565
Committee Mail Address:	500 NEW JERSEY AVE NW SUITE 375 WASHINGTON, DC 20001
Committee Street Address:	500 NEW JERSEY AVE NW SUITE 375 WASHINGTON, DC 20001
Treasurer:	RICHARD A. JOHNSON 500 NEW JERSEY AVE NW SUITE 375 WASHINGTON, DC 20001 (602) 935-9565
Designated Record Keeper:	
Reporting Waiver	No

Names and addresses of depositories or intended depositories of committee funds

Official Depository:	BMO HARRIS BANK 111 W. MONROE ST. CHICAGO, IL 60603
Secondary Depository:	
Support/Opposed:	
Ballot Proposal:	
Jurisdiction:	

Documents on File

Click on a document to access data and images for this committee.

N/A = Not applicable to this document type.

* Fee has an outstanding balance.

Statement Year	Document Type	Document Covers	Statement Due	Sent/Received	Doc Seq#
	NEW SUPER PAC LETTER (https://cfrsearch.nictusa.com/documents/525454)	N/A	N/A	05/12/2022	525454
	NO REPORTING WAIVER LETTER (https://cfrsearch.nictusa.com/documents/525453)	N/A	N/A	05/12/2022	525453
2022	APRIL QUARTERLY CS(e) (https://cfrsearch.nictusa.com/documents/523990)	01/01/2022 – 04/20/2022	04/25/2022	04/25/2022	523990
2022	AMENDED INDEPENDENT EXPENDITURE REPORT(e) (https://cfrsearch.nictusa.com/documents/521189)	Not Available	N/A	02/25/2022	521189
2022	AMENDED INDEPENDENT EXPENDITURE REPORT(e) (https://cfrsearch.nictusa.com/documents/521188)	Not Available	N/A	02/25/2022	521188
2022	INDEPENDENT EXPENDITURE REPORT(e) (https://cfrsearch.nictusa.com/documents/521187)	Not Available	Not Available	02/25/2022	521187
2022	INDEPENDENT EXPENDITURE REPORT(e) (https://cfrsearch.nictusa.com/documents/521151)	Not Available	Not Available	02/24/2022	521151
2022	LATE CONTRIBUTION REPORT(e) (https://cfrsearch.nictusa.com/documents/521150)	N/A	Not Available	02/24/2022	521150
	S of O - INFORMATION(e)	N/A	N/A	02/22/2022	521137

Copyright © 2022 State of Michigan

v1.0.0+bb78c45

FOIA (<http://www.michigan.gov/sos/0,4670,7-127--357908--,00.html>)

Transparency (<http://www.michigan.gov/openmichigan/0,4648,7-266-58520--,00.html>)

Office of Regulatory Reinvention (<http://www.michigan.gov/lara/0,4601,7-154-35738--,00.html>)

Forms (http://www.michigan.gov/sos/0,1607,7-127-1640_11777--,00.html)

FAQ (<http://www.michigan.gov/sos/0,1607,7-127-12539--F,00.html>)

Online Services (<https://onlineservices.michigan.gov/ExpressSOS>) SOS Home (<http://www.michigan.gov/sos>)

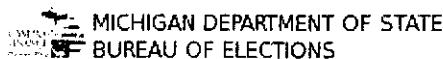
Contact the Secretary of State (<http://www.michigan.gov/sos/0,4670,7-127--25634--,00.html>)

State Web Sites (<http://www.michigan.gov/sos/0,1607,7-127---A,00.html>)

Michigan.gov Home (<http://www.michigan.gov/>)

Michigan News (<http://www.michigan.gov/minewswire>)

Policies (<http://www.michigan.gov/sos/0,4670,7-127--281460--,00.html>)



POLITICAL ACTION COMMITTEE COVER PAGE

• **Committee ID** 520433-0
 • **Committee Name** Convention of States Political Fund
 • **Coverage Period** 04/20/2022 - 07/20/2022
 • **Address Information**
 • **Committee Mailing** 500 New Jersey Ave NW Suite 375
 Washington DC 20001
 • **Phone** (602) 935-9565
 • **Treasurer Name** Richard Johnson
 • **Treasurer Residential** 500 New Jersey Ave Suite 375
 Washington DC 20001
 • **Phone** (602) 935-9565
 • **Treasurer Business** N7130 North Lost Lake Road
 Randolph WI 53956
 • **Phone**
 • **Recordkeeper Name**
 • **Recordkeeper Mailing**
 • **Phone**
 • **Statement Type** Amended - July - Quarterly
 • **Relates To**
 • **Election Date** //
 • **Dissolution Date (effective)** //
 • **Annual Statement Coverage Year**
 • **Treasurer/Recordkeeper Signed** Richard Johnson • **Date** 07/20/2022

A committee that does not have a Reporting Waiver must file all required Campaign Statements. The Campaign Statements must include all applicable Schedules. Direct contributions, in-kind contributions, loans, expenditures, and outstanding debts count against the \$1,000 Reporting Waiver threshold. If any of the information listed in the items above has changed since the information was shown on the committee's Statement of Organization, an amendment to the Statement of Organization should accompany this Campaign Statement. **If a request for a Reporting Waiver is not received on or before the filing deadline of a required campaign statement, that campaign statement cannot be waived.**

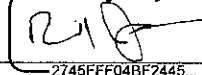
Verification: I\We certify that all reasonable diligence was used in the preparation of this statement and attached schedules (if any) and to the best of my\our knowledge and belief the contents are true, accurate and complete.

Current Treasurer or Designated Record keeper:

(Type or Print) Name: Richard A. Johnson

Signature:

DocuSigned by:



20-Jul-2022

Date:

2745FFF04BF2445...

POLITICAL ACTION COMMITTEE SUMMARY PAGE

• **Committee ID** 520433-0
 • **Committee Name** Convention of States Political Fund
 • **Document Name** Amended - July - Quarterly

RECEIPTS		This Period	Cumulative
3. Contributions			
a. Itemized Contributions	(3a.)	700,000.00	
b. Unitemized	(3b.)	0.00	
c. Subtotal of Contributions	(3c.)	700,000.00 (18.)	737,765.75
4. Other Receipts	(4.)	8,516.44 (19.)	8,516.44
5. Total Contributions and Other Receipts	(5.)	708,516.44 (20.)	746,282.19
IN-KIND CONTRIBUTIONS			
6. In-Kind Contributions			
a. Itemized	(6a.)	0.00	
b. Unitemized (less than \$20.01 each)	(6b.)	0.00	
7. Total In-Kind Contributions	(7.)	0.00 (21.)	0.00
EXPENDITURES			
8. Expenditures			
a. Itemized	(8a.)	598,973.17	
b. Itemized GOTV	(8b.)	0.00	
c. In-Kind Expenditures - Purchase of Goods or Services	(8c.)	3,358.00	
d. Unitemized (less than \$50.01 each)	(8d.)	0.00	
e. Subtotal of Expenditures	(8e.)	602,331.17 (22.)	608,601.60
9. Independent Expenditures	(9.)	20,000.00 (23.)	47,915.75
10. Total Expenditures	(10.)	622,331.17 (24.)	656,517.35
IN-KIND EXPENDITURES			
11. In-Kind Expenditures, Endorsements, Donations or Loans of Goods and Services	(11.)	0.00 (25.)	0.00
DEBTS AND OBLIGATIONS			
12. Debts and Obligations			
a. Owed by the Committee	(12a.)	0.00	
b. Owed to the Committee	(12b.)	0.00	
BALANCE STATEMENT			
13. Ending Balance of last report filed	(13.)		3,579.57
14. Amount received during reporting Period	(14.)		708,516.44
15. Subtotal	(15.)		712,096.01
16. Amount Expended during reporting Period	(16.)		622,331.17
17. ENDING BALANCE	(17.)		89,764.84

CONTRIBUTIONS (2A) POLITICAL ACTION COMMITTEE

• **Committee ID** 520433-0
• **Committee Name** Convention of States Political Fund
• **Document Name** Amended - July - Quarterly

4211- -No-Change

PAC Receipt?: **Date of Receipt:** 05/02/2022 **Amt:** 50,000.00 **Cumul:** 56,000.00

Name: Conservative Action for Americ **Occupation:**
Address: 4600 East Washington Suite
300
City: Phoenix **State:** AZ
Zip: 85034

Employer:
Business Address:
City: **State:**
Zip:

Type of Contribution: Direct

4212- -No-Change

PAC Receipt?: **Date of Receipt:** 05/02/2022 **Amt:** 350,000.00 **Cumul:** 381,665.75

Name: Convention of States Action **Occupation:**
Address: 5850 San Felipe Suite 580A
City: Houston **State:** TX
Zip: 77057

Employer:
Business Address:
City: **State:**
Zip:

Type of Contribution: Direct

4159- -No-Change

PAC Receipt?: **Date of Receipt:** 05/20/2022 **Amt:** 100,000.00 **Cumul:** 156,000.00

Name: Conservative Action for Americ **Occupation:**
Address: 4600 East Washington Suite
300
City: Phoenix **State:** AZ
Zip: 85034

Employer:
Business Address:
City: **State:**
Zip:

Type of Contribution: Direct

4168- -No-Change

PAC Receipt?: **Date of Receipt:** 05/24/2022 **Amt:** 100,000.00 **Cumul:** 256,000.00

Name: Conservative Action for Americ **Occupation:**
Address: 4600 East Washington Suite
300
City: Phoenix **State:** AZ
Zip: 85034

Employer:
Business Address:
City: **State:**
Zip:

Type of Contribution: Direct

CONTRIBUTIONS (2A) POLITICAL ACTION COMMITTEE

4215- -No-Change

PAC Receipt?:	Date of Receipt: 07/19/2022	Amt: 100,000.00	Cumul: 356,000.00
Name: Conservative Action for Americ		Occupation:	
Address: 4600 East Washington Suite 300		Employer:	
City: Phoenix State: AZ		Business Address:	
Zip: 85034		City: State:	
		Zip:	
Type of Contribution: Direct			

Schedule Total	\$ 700,000.00
-----------------------	----------------------

Ex. 6

Transactions Flow Chart for Convention of States Political Fund and Related Entities (Jan. - June 2022)

