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December 22, 2010

Christopher Hughey, Esq.
General Counsel's Office
999 E Street, NW
Washington, DC 20463

Re: *Response of Crossroads Grassroots Policy Strategies in MUR 6396*

Dear Mr. Hughey,

This Response is submitted by the undersigned counsel on behalf of Crossroads Grassroots Policy Strategies (Crossroads GPS), in response to the Complaint designated as Matter Under Review 6396. By letter dated October 28, 2010, we requested a 45-day extension to respond to the Complaint, or until December 24, 2010, citing "the breadth of the issues raised in the Complaint, both factual and legal." After executing a tolling agreement, our extension request was granted by letter dated November 4, 2010.

The lead Complainant, Public Citizen, is a familiar one to the Commission, and is joined not by its usual allies, but by a quartet of relatively unknown, far-left organizations. Together, they suffer from a nagging inability to correctly describe prevailing legal standards. Once the correct legal standards are identified and applied, however, it is readily apparent that Crossroads GPS is *not* a "political committee," as the Complainants contend.

Crossroads GPS acknowledges making independent expenditures, consistent with *Citizens United v. FEC*. It filed independent expenditure reports with the FEC, as appropriate, as well as electioneering communications reports when required to do so. Crossroads GPS's FEC-regulated public communications all contain appropriate disclaimers. The organization's "major purpose," however, is not Federal campaign activity. In fact, through calendar year 2010, Crossroads GPS has spent approximately 60% of its resources on activities consistent with its tax-exempt purpose, including issue advocacy and grassroots lobbying communications with the general public. Accordingly, Crossroads GPS is not a "political committee," as that term is used in the Federal Election Campaign Act (FECA), and therefore, is not required to file a Statement of Organization or quarterly financial activity reports with the Commission.

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Briefly stated, Crossroads GPS is, and always has been, in full compliance with FECA and all applicable FEC regulations.

I. Organizational Status

Crossroads GPS is organized under Section 501(c)(4) of the Internal Revenue Code as a social welfare organization. It is not a Section 527 political organization, nor a "political committee" subject to regulation by the FEC. Crossroads GPS engages in a limited amount of express advocacy activity which it believes complements its exempt purpose social welfare activities.

Under applicable Internal Revenue Service (IRS) standards, Crossroads GPS conducts itself appropriately. Specifically, IRS standards permit a Section 501(c)(4) organization to engage in some "political activity" so long as the organization's *primary purpose* is not the "direct or indirect participation or intervention in political campaigns on behalf of or in opposition to any candidate for public office."¹ Given the rough equivalence of the IRS "primary purpose" test and the FEC's "major purpose" test, a Section 501(c)(4) organization that is in compliance with IRS standards *should* be found to satisfy the FEC's "political committee" test.

Moreover, the IRS's "primary purpose" determination is made with respect to a full tax year of organizational activity. The current fiscal year of Crossroads GPS runs from June 1, 2010 to May 31, 2011. Thus, any IRS inquiry into the "primary purpose" of Crossroads GPS would not be in order until *after* May 31, 2011. Crossroads GPS is commissioning a full independent audit to be conducted beginning in June 2011, the results of which will be used to file the organization's annual tax return (IRS Form 990) in October 2011 or January 2012 (depending on whether Crossroads GPS applies for a routine extension). While the FEC may apply different tests and standards for determining "political committee" status, it is at least premature for the Commission to act on a complaint that attempts to define the nature of an organization that has yet to complete its first full year of advocacy activity. Nevertheless, Crossroads GPS has acted lawfully at all times, and has never qualified for "political committee" status.

¹See Rev. Rul. 81-95; Treas. Reg. § 1.501(c)(4)-1(a)(2)(ii).

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II. Complainant Misstates the Commission's "Political Committee Status" Test

The Complainants allege that "Crossroads GPS has violated the law by raising and spending significant amounts of money to influence the 2010 congressional elections without (1) registering as a political committee, as required by 2 U.S.C. § 433, (2) filing political committee financial disclosure reports required by 2 U.S.C. § 434, and (3) complying with the political committee organizational requirements of 2 U.S.C. § 432." Complaint at ¶ 1. According to the Complainants, "Crossroads GPS likely qualifies as an 'independent expenditure only' committee." *Id.* at footnote 1.

A. Correct Order of Political Committee Status Test

Complainants mischaracterize the "political committee" status test based on a reading of *Buckley v. Valeo* that the Commission has rejected repeatedly. According to Complainants, the "major purpose" of an organization is to be determined first, followed by an examination of whether the organization has made "expenditures" or received "contributions." Why Complainants would insist on this backwards approach is no mystery. Under their version of the *Buckley* standard, if Complainants can convince an adjudicatory body that an organization's "major purpose" is federal political/campaign activity, then *all* of the organization's spending can be presumed to be an "expenditure," and the distinction between issue advocacy and express advocacy can be disregarded.² Because there is no clearly defined "test" for determining "major purpose," this approach generates precisely the amorphous, ripe-for-abuse "I know it when I see it" approach to political committee status that the so-called "reform" lobby (including one of the Complainants) has pursued for years as part of its efforts to silence the political speech of others.

The Commission, of course, has always utilized the reverse approach; that is, the Commission first asks whether an organization has made "expenditures" or received "contributions," and *then* makes inquiries into the organization's "major purpose," using a relatively undefined set of standards. As the Commission realizes, however, the only way to determine *the* "major purpose" of an organization is by reviewing the organization's activities in terms of "express advocacy" and "issue advocacy." Other factors, such as officer and director statements and other public statements are peripheral to the inquiry. Thus, "expenditures" and "contributions" must be examined before the "major purpose" determination can possibly be made.

² Complainants write at ¶ 17: "the test for 'expenditure' in this case is the statutory standard of whether disbursements have been made 'for the purpose of influencing' any federal election, regardless of whether the disbursements were for any 'express advocacy' communication."

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The order of the Commission's inquiry is clearly set forth in the 2007 Supplemental Explanation and Justification on Political Committee Status:

[D]etermining political committee status under FECA, as modified by the Supreme Court, requires an analysis of both an organization's specific conduct – whether it received \$1,000 in contributions or made \$1,000 in expenditures – as well as its overall conduct – whether its major purpose is Federal campaign activity (i.e., the nomination or election of a Federal candidate).

Many administrative actions, including the recently resolved actions against several 527 organizations . . . , include substantial investigations and case-by-case analyses and determinations of whether a group's fundraising generated "contributions" and whether payments for its communications made independently of a candidate constituted "expenditures," as alternative prerequisites to a determination that a group is a political committee, prior to any consideration of the group's major purpose.

Supplemental Explanation and Justification on Political Committee Status, 72 Fed. Reg. 5595, 5597 (Feb. 7, 2007) (emphasis added).

The same document further explains, "the major purpose test serves as an additional hurdle to establishing political committee status. Not only must the organization have raised or spent \$1,000 in contributions or expenditures, but it must additionally have the major purpose of engaging in Federal campaign activity." *Id.* at 5601. See also MUR 5694 (Americans for Job Security, Inc.), Statement of Reasons of Vice Chairman Petersen and Commissioners Hunter and McGahn at 16 ("Contrary to how the complainants may wish to have it applied, the 'major purpose' test is not the first prong of a two-prong test for political committee status.").

While Crossroads GPS freely concedes that it has made more than \$1,000 in "expenditures," the organization's "major purpose" can only be determined by analyzing the whole its activities, which means comparing its express advocacy (expenditure) activity to its issue advocacy, grassroots lobbying and other non-expenditure activity.

Complainants rely on dicta from *Shays v. FEC*, 511 F.Supp.2d 19 (D.D.C. 2007) in support of their argument that "major purpose" should be examined first. They neglect to note that the court actually concluded that the FEC's approach to determining "political committee" status, as set forth in the Supplemental Explanation and Justification on Political Committee Status, "is not unlawful in any way" because "[w]hile plaintiffs would like the agency to first

determine an organization's major purpose, with particular focus on whether they are a 527 group, neither the statute nor judicial precedent establishes any particular 'order of operations' in making the 'political committee' determination." *Shays v. FEC*, 511 F.Supp.2d at 17-18. In fact, contrary to Complainants' assertions, the FEC's established approach was upheld in the case it cites.

B. "A" Versus "The" Major Purpose

We also note that Complainants, when describing the applicable "major purpose" standard, repeatedly refer to "a major purpose" of the organization, as opposed to "the major purpose" of the organization. See, e.g., Complaint at ¶¶ 11, 13, 15 and 28. We presume the Complainants' language is an intentional misstatement of the law, and also presume that the Commission is well-aware that *Buckley* refers to "the major purpose" of an organization. In 2008, the Fourth Circuit Court of Appeals specifically addressed the issue of "a major purpose" versus "the major purpose." The Fourth Circuit concluded:

Viewed in light of *Buckley*'s goals, it is clear that the importance the plaintiffs attach to the definite article is correct. *Buckley*'s articulation of the permissible scope of political committee regulation is best understood as an empirical judgment as to whether an organization primarily engages in regulable, election-related speech. Thus, the Court in *Buckley* must have been using "the major purpose" test to identify organizations that had the election or opposition of a candidate as their only or primary goal -- this ensured that the burdens facing a political committee largely fell on election-related speech, rather than on protected political speech. *Id.* (stating that political committees, as defined by "the major purpose" test, are "by definition, campaign related"). If organizations were regulable merely for having the support or opposition of a candidate as "a major purpose," political committee burdens could fall on organizations primarily engaged in speech on political issues unrelated to a particular candidate. This would not only contravene both the spirit and the letter of *Buckley*'s "unambiguously campaign related" test, but it would also subject a large quantity of ordinary political speech to regulation.

Subsequent case law affirms the plaintiff's interpretation. To begin, the Supreme Court reaffirmed *Buckley*'s "the major purpose" test in *Federal Election Commission v. Massachusetts Citizens for Life, Inc.*, 479 U.S. 238, 107 S. Ct. 616, 93 L. Ed. 2d 539 (1986) ("MCFL"). There, the Court stated that an organization could be classified as a political committee if "the organization's major purpose may be regarded as campaign activity," and referred to regulable political committees as "groups whose primary objective is to influence political campaigns." *Id.* at 262 (emphasis added). Furthermore, *McConnell* recently quoted *Buckley*'s "the major purpose" language favorably. See

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McConnell, 540 U.S. at 170 n.64. The Supreme Court has thus not relaxed the requirement that an organization have “the major purpose” of supporting or opposing a candidate to be considered a political committee. And given the Supreme Court’s direction on this issue, it is unsurprising that a number of lower courts have also adopted *Buckley*’s “the major purpose” test in some form, highlighting that regulation as a political committee is only proper if an organization primarily engages in election-related speech. See, e.g., *California Pro-Life Council, Inc. v. Getman*, 328 F.3d 1088, 1104 n.21 (9th Cir. 2003); *Fed. Election Comm’n v. Machinists Non-partisan Political League*, 210 U.S. App. D.C. 267, 655 F.2d 380, 391-92 (D.C.Cir. 1981); *Richey v. Tyson*, 120 F. Supp. 2d 1298, 1311 (S.D. Ala. 2000); *Volle v. Webster*, 69 F. Supp. 2d 171, 174-76 (D. Me. 1999); *New York Civil Liberties Union, Inc. v. Acito*, 459 F. Supp. 75, 84 n.5, 89 (S.D.N.Y. 1978).

Thus, we are convinced that the Court in *Buckley* did indeed mean exactly what it said when it held that an entity must have “the major purpose” of supporting or opposing a candidate to be designated a political committee. Narrowly construing the definition of political committee in that way ensures that the burdens of political committee designation only fall on entities whose primary, or only, activities are within the “core” of Congress’s power to regulate elections. *Buckley*, 424 U.S. at 79. Permitting the regulation of organizations as political committees when the goal of influencing elections is merely one of multiple “major purposes” threatens the regulation of too much ordinary political speech to be constitutional.

North Carolina Right to Life, Inc. v. Leake, 525 F.3d 274, 287-289 (4th Cir. 2008) (internal footnote omitted). See also MUR 5694 (*Americans for Job Security, Inc.*), Statement of Reasons of Vice Chairman Petersen and Commissioners Hunter and McGahn at 16-17 n.61 (“We note that the appropriate test looks to ‘the’ major purpose, and not simply whether influencing elections is one of several subjective goals....If organizations were regulable merely for having the support or opposition of a candidate as ‘a major purpose,’ political committee burdens could fall on organizations primarily engaged in speech on political issues unrelated to a particular candidate.”).

III. Crossroads GPS's Express Advocacy Activities Versus Grassroots Issue Advocacy and Other Educational Activities

Complainants attempt to bolster their apparently poor grasp of the law with a sloppy and incomplete compilation of facts.³ They note that Crossroads GPS maintains a YouTube Channel, where it posts copies of its advertisements, and assert that this YouTube Channel "contain[s] 22 ads obviously produced 'for the purpose of influencing' the 2010 Congressional elections, see 2 U.S.C. § 431(9)(A)(i), with all or most also expressly advocating the election or defeat of candidates for federal office."⁴ Complaint at ¶ 37.

Due to their haste in filing this Complaint, Complainants were unable to present a complete picture of Crossroads GPS's activities, and do not even attempt to provide the Commission with a full inventory of Crossroads GPS's public communications. It appears that Complainants have not even taken the time to review Crossroads GPS's electioneering communication and independent expenditure reports that are available on the FEC's website.

A. Basic Overview of Crossroads GPS Finances

As a Section 501(c)(4) organization, Crossroads GPS is not required to publicly report any of its non-express advocacy spending until it files IRS Form 990. However, for the sole purpose of responding to this Complaint, the following overview is provided.

From its inception on June 1, 2010 through December 15, 2010, Crossroads GPS raised approximately \$43.6 million. Approximately \$39.1 million of this total was spent on communications with the public, pre-production activities in support of these communications, and grants to other non-profit organizations engaged in social welfare activities. Of this approximately \$39.1 million, \$15,445,039.50 was spent on independent expenditures that were reported to the FEC. The remaining amount, approximately \$23.7 million, was spent on activities furthering the exempt purpose of Crossroads GPS, including issue advocacy, grassroots lobbying, and educational activities to promote issues related to the organization's "7 in '11" National Action Plan (described in more detail on page 16 of this Response). The 2010 calendar year percentage split between exempt purpose spending and independent expenditures is

³ We note that one of the Complainants, Public Citizen, has been chastised by these Commissioners in the past for its haphazard approach to filing complaints. See MUR 5694 (Americans for Job Security, Inc.), Statement of Reasons of Vice Chairman Petersen and Commissioners Hunter and McGahn at 1 n.1.

⁴ Complainants' assertion that the phrase "for the purpose of influencing" means something broader than "express advocacy" is a product of their wrongly-ordered political committee status test – and is yet another instance of their refusal to correctly represent the law before the Commission.

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approximately 59% to 39%. The remaining 2% is attributable to overhead and administrative expenses.

B. Grassroots Issue Advocacy and Other Educational Activities

As noted above, Crossroads GPS has spent the great majority of its funds on grassroots lobbying, issue advocacy and educational activities. Also, Crossroads GPS is in the process of commissioning a full, independent audit of its finances, to be conducted beginning in June 2011, after Crossroads GPS's current fiscal year (June 1, 2010 – May 31, 2011) ends. In the meantime, Crossroads GPS is able to provide the Commission with the following figures, which are compiled from existing records.

1. Pre-Electioneering Communication Period Issue Advocacy

In the summer of 2010, two months after its formation and prior to the commencement of the general electioneering communications period, Crossroads GPS announced its "7 in '11" National Action Plan: a policy agenda of key national legislative matters impacting jobs and the economy that would need to be addressed by Congress in any "lame-duck" session and in 2011. During the same time period, and prior to the commencement of the electioneering communications period, Crossroads GPS aired seven issue advocacy and/or grassroots lobbying advertisements on issues related to the "7 in '11" National Action Plan. Approximately \$4.3 million was spent on these television advertisements. (These advertisements are titled: "Worried"⁵; "Calendar"⁶; "Debt Clock"⁷; "Lawsuit"⁸; "Wrong Way"⁹; "Thanks Harry"¹⁰; and "Hurting."¹¹ All are available on YouTube, at the links noted, and scripts are attached as well.)

Each of these advertisements constituted grassroots lobbying and issue advocacy under Chief Justice Robert's *Wisconsin Right to Life* test, and none contained express advocacy. These ads urged viewers to take action with respect to specific policies or legislation under consideration by Congress. The ads prominently provided the address of the Crossroads GPS website, which directed visitors to template pages enabling viewers to send letters and emails to Members of Congress, urging them to take specific policy and legislative actions. Viewers could also send letters to the editors of various publications and make blog postings.

⁵ "Worried": <http://www.youtube.com/user/CrossroadsGPSChannel#p/u/35/wQd74O3PEM8>.

⁶ "Calendar": <http://www.youtube.com/user/CrossroadsGPSChannel#p/u/40/fR5DHhYcqU4>.

⁷ "Debt Clock": <http://www.youtube.com/user/CrossroadsGPSChannel#p/u/34/7UzT0QTcZKw>.

⁸ "Lawsuit": <http://www.youtube.com/user/CrossroadsGPSChannel#p/u/38/4lr9xEr9zgU>.

⁹ "Wrong Way": <http://www.youtube.com/user/CrossroadsGPSChannel#p/u/36/fEKxPGcEDVM>.

¹⁰ "Thanks Harry": <http://www.youtube.com/user/CrossroadsGPSChannel#p/u/39/NmGfdA2-wB0>.

¹¹ "Hurting": <http://www.youtube.com/user/CrossroadsGPSChannel#p/u/37/NCBIbj9nOMs>.

2. Communications During the Electioneering Period

During the electioneering communications period, Crossroads GPS filed electioneering communications reports, totaling \$1,104,783.48, for four television advertisements that satisfied the statutory definition of "electioneering communication" at 2 U.S.C. § 434(f)(3). (See "Debt Clock Long,"¹² "Health/Bad Sign,"¹³ "Health/Baby,"¹⁴ and "Jobs/Thanks a Lot."¹⁵) In some instances, these electioneering communications were the same ads referenced in the section above, but which happened to straddle the beginning date of the electioneering communications period.

These four advertisements contained no express advocacy – under either 11 C.F.R. § 100.22(a) or (b) – and qualify as grassroots lobbying and issue advocacy communications under the standards set forth in *FEC v. Wisconsin Right To Life*, 551 U.S. 449 (2007). As with Crossroads GPS' issue advocacy advertising prior to the electioneering period, all of these ads advocated viewer action on a current, specific legislative or policy issue, and two linked to the Crossroads GPS website which provided further information and an opportunity for viewers to personally advocate on the issue with their elected representatives or local media. (The other two ads provided a telephone number for viewers to call.)

All of Crossroads GPS's non-express advocacy communications bear the hallmarks of genuine grassroots lobbying and issue advocacy communications, as described by Chief Justice Roberts in *FEC v. Wisconsin Right To Life, Inc.* That is, the:

ads are plainly not the functional equivalent of express advocacy. First, their content is consistent with that of a genuine issue ad: The ads focus on a legislative issue, take a position on the issue, exhort the public to adopt that position, and urge the public to contact public officials with respect to the matter. Second, their content lacks indicia of express advocacy: The ads do not mention an election, candidacy, political party, or challenger; and they do not take a position on a candidate's character, qualifications, or fitness for office.

FEC v. Wisconsin Right to Life, Inc., 551 U.S. at 470. Moreover, "[i]ssue advocacy conveys information and advertises. An issue ad's impact on an election, if it exists at all, will come only after the voters hear the information and choose – uninvited by the ad – to factor it into their voting decisions." *Id.* And, of course, we must remember that "contextual factors . . . should

¹² "Debt Clock Long": <http://www.youtube.com/user/CrossroadsGPSChannel#p/u/30/7OjW3Negpm0>.

¹³ "Health/Bad Sign": <http://www.youtube.com/user/CrossroadsGPSChannel#p/u/33/a5BvNfti8dg>.

¹⁴ "Health/Baby": <http://www.youtube.com/user/CrossroadsGPSChannel#p/u/31/gWwnTGkwGwI>.

¹⁵ "Jobs/Thanks a Lot": http://www.youtube.com/user/CrossroadsGPSChannel#p/u/32/3F1IX0_trLk.

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seldom pay a significant role" in evaluating whether an ad satisfies the *Wisconsin Right to Life* test. *Id.* at 473-474. Finally, "WRTL does not forfeit its right to speak on issues simply because in other aspects of its work it also opposes candidates who are involved with those issues." *Id.* at 472.

Complainants' do not even attempt to undertake an individualized analysis of particular ads that it believes should be subject to regulation, but merely states that *all* of Crossroads GPS's advertisements (or at least the ads they were able to find quickly on YouTube) were "obviously produced 'for the purpose of influencing' the 2010 Congressional elections . . . with all or most also expressly advocating the election or defeat of candidates for federal office." Complaint at ¶ 37. **To the extent that Complainants offer only conclusory statements, as opposed to specific allegations of wrongdoing, they have not carried their burden of demonstrating that there is reason to believe a violation occurred.**

Complainants specifically refer to eight television ads produced and distributed by Crossroads GPS. *See* Complaint at ¶¶ 38-46. These paragraphs of the Complaint are not accompanied by any analysis, although we presume the Complainants' conclusory language in Paragraph 37 is intended to apply to each of the eight specifically referenced advertisements. However, if ¶¶ 38-46 of the Complaint prove anything, it is that Crossroads GPS sponsored a limited number of independent expenditures, which it reported to the FEC, and sponsored far more issue advocacy advertisements. Insofar as Complainant asserts that "all or most [of Crossroads GPS's television ads] also expressly advocat[e] the election or defeat of candidates for federal office," *see* Complaint at ¶ 37, the examples they provide at ¶¶ 38-46 prove them wrong.

- Paragraph 38 of the Complaint refers to "Add Up," which was reported to the FEC as an independent expenditure.
- Paragraph 39 of the Complaint refers to "Choice," which was reported to the FEC as an independent expenditure.
- Paragraph 40 of the Complaint refers to "Worried," which is clearly an issue ad under the *Wisconsin Right to Life* test. "Worried" was distributed prior to the electioneering communications period, and urged viewers to call Senator Boxer to urge her to stop Obamacare's Medicare cuts.
- Paragraph 41 of the Complaint refers to "Hurting," which is clearly an issue ad under the *Wisconsin Right to Life* test. "Hurting" was distributed prior to the electioneering communications period, and urged viewers to call Congressman Joe Sestak to urge him to stop Obamacare's Medicare cuts.
- Paragraph 42 of the Complaint refers to "Bad Sign," which was reported to the FEC as an electioneering communication. It contains no words of express advocacy, and is an issue ad under the *Wisconsin Right to Life* test. "Bad Sign"

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urged viewers to contact Kentucky Attorney General Jack Conway to urge him to support other state Attorneys General in their lawsuit against Obamacare's individual mandate provision.

- Paragraph 43 of the Complaint refers to "Calendar," which is an issue ad under the *Wisconsin Right to Life* test. "Calendar" was distributed prior to the electioneering communications period. "Calendar" urged viewers to call Senator Michael Bennet to urge him to "stop the spending spree" by voting against Senate Amendment 4594.
- Paragraph 44 of the Complaint refers to "Lawsuit," which is an issue ad under the *Wisconsin Right to Life* test. "Lawsuit" was distributed prior to the electioneering communications period. "Lawsuit" urged viewers to call Robin Carnahan to urge her to support the Obamacare legal challenge and the Missouri Lieutenant Governor's lawsuit.
- Paragraph 45 of the Complaint refers to "Thanks Harry," which is an issue ad under the *Wisconsin Right to Life* test. "Thanks Harry" was distributed prior to the electioneering communications period. "Thanks Harry" urged viewers to contact Senator Harry Reid to urge him to help Nevada by rejecting new stimulus spending.

Complainants expend considerable effort attempting to establish that the express advocacy standard set forth at 11 C.F.R. § 100.22(b) is valid and applicable. See Complaint at ¶¶ 19-21. The validity of section 100.22(b) is largely irrelevant in this matter because Crossroads GPS fully acknowledges making express advocacy communications, and it has filed independent expenditure reports for those communications.¹⁶ The communications that Crossroads GPS classifies as grassroots lobbying, education, and issue advocacy do not meet any express advocacy standard. To the extent that Complainants argue that "all or most" of Crossroads GPS's television advertisements contain express advocacy, they are simply incorrect, and their own Complaint demonstrates as much. Complainants offer only unwarranted, incorrect, and overbroad legal conclusions that are unsupported by the facts.

None of the communications classified by Crossroads GPS as grassroots lobbying or issue advocacy contain the "magic words" of 11 C.F.R. § 100.22(a), nor does any contain an "electoral portion" that is "unmistakably, unambiguous, and suggestive of only one meaning" of which "reasonable minds could not differ as to whether it encourages actions to elect or defeat one or more clearly identified candidates." See 11 C.F.R. § 100.22(b). With respect to those advertisements that qualify as statutory electioneering communications, each satisfies Chief

¹⁶ Because we do not believe that any aspect of this matter turns on the validity or applicability of 11 C.F.R. § 100.22(b), we have not included discussion of its constitutionality. If any such discussion is needed, we direct your attention to MLJR 5974 (New Summit Republicans), Statement of Reasons of Vice Chairman Petersen and Commissioners Hunter and McGahn at 4-5, n.10.

Justice Roberts' test in *FEC v. Wisconsin Right to Life, Inc.* for identifying communications that are *not* the functional equivalent of express advocacy.

Scripts of Crossroads GPS's television advertisements are included in the attached materials. The advertisements themselves are available on Crossroads GPS's YouTube channel, at <http://www.youtube.com/user/crossroadsgpschannel>.

3. Other Activities

In addition to the particular television advertisements discussed above, Crossroads GPS has engaged in a broad range of other advocacy activities that Complainants choose to ignore.

- Both before and after the national elections, Crossroads GPS sponsored issue advocacy print advertisements on the tax relief extension issue. See the attached advertisement, urging support for S.3773, the Tax Hike Prevention Act, which was published in *Roll Call* and *Politico* on September 28, 2010, and in *Roll Call* and *The Hill* on November 17, 2010.
- Crossroads GPS sponsored numerous issue advocacy mailings and phone calls.
- Crossroads GPS made grants to other Section 501(c)(4) organizations in calendar year 2010. These grants were made under the condition that the funds be spent on activities consistent with each organization's Section 501(c)(4) exempt purpose.
- In December 2010, Crossroads GPS conducted and publicly released a nationwide public opinion study showing strong support for extending the Bush-era tax rates for all taxpayers, as part of a multifaceted effort to build support for broad-based tax relief.
- Also in December 2010, Crossroads GPS spent hundreds of thousands of dollars on radio advertisements urging the House majority to act on extending the Bush-era tax rates for all taxpayers. The ads ran during a time period when there was considerable uncertainty over what the House leadership would do and whether it would attempt to modify the White House-Senate "deal" on tax rates. Within days after the ads began, the House majority signaled that it would move forward with a straightforward vote to accept the White House-Senate "deal." (The script for these advertisements, titled "Deal," is included in the attachments.)
- Crossroads GPS built and maintains a website, which is described in more detail on pages 15-16 of this Response.
- As noted earlier, Crossroads GPS developed and publicized its "7 in '11" National Action Plan, which lists "seven key priorities for legislative action this fall or in a 'lame-duck' session of Congress or in 2011."

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- Crossroads GPS engaged in extensive research to create lists of citizens who are concerned about issues including those in the "7 in '11" National Action Plan.

Altogether, Crossroads GPS spent approximately \$23.7 million on activities in furtherance of its Section 501(c)(4) exempt purpose, including issue advocacy and grassroots lobbying communications.

As of December 15, 2010, Crossroads GPS had approximately \$4 million cash on hand, most of which will be spent on activities related to legislative and policy issues in 2011. To put this figure into context, the budget for the Crossroads GPS issue advocacy program in 2011 (although not finalized and approved) is anticipated to be at least \$20 million.

C. Express Advocacy

Crossroads GPS spent \$15,445,039.50 on televised independent expenditures, all of which were reported to the FEC. Crossroads GPS's 48-hour, 24-hour, and quarterly independent expenditure reports are publicly available on the FEC's website. An additional \$4,500 was spent on express advocacy phone calls, also reported to the FEC, bringing Crossroads GPS's total calendar year 2010 independent expenditure figure to \$15,749,171. This figure represents approximately 39% of Crossroads GPS's calendar year 2010 spending (and does not include the additional \$4 million that Crossroads GPS has already designated for spending on legislative and policy advocacy in 2011).

IV. The Major Purpose of Crossroads GPS is Issue Advocacy, Grassroots Lobbying and Education of the General Public

As noted above, Crossroads GPS has publicly acknowledged making more than \$1,000 in independent expenditures.¹⁷ Thus, unlike most prior political committee status cases, the major

¹⁷ Following the repeal of critical portions of 11 C.F.R. § 100.57, there does not appear to be clear standard for determining when a donation is treated as a "contribution." We presume that the court-ordered repeal of 11 C.F.R. § 100.57 was also a rejection of the standard set forth in *FEC v. Survival Education Fund, Inc.*, 65 F.3d 285 (2d Cir. 1995). Regardless of what standard the Commission currently uses for determining when a donation is treated as a "contribution," Crossroads GPS's fundraising was conducted in a manner appropriate for a Section 501(c)(4) organization. No funds were solicited for the purpose of supporting or opposing the election of clearly identified Federal candidates or for otherwise engaging in Federal political campaign activity. Rather, all solicitations emphasized that any funds raised would support the general mission of Crossroads GPS, which is to educate, equip and mobilize millions of American citizens to take action on the critical economic and legislative issues that will shape our nation's future in the years ahead. Additionally, no funds were solicited or received for the specific purpose of funding electioneering communications or independent expenditures.

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point of contention in this case is *not* whether the organization engaged in express advocacy, but rather, whether Crossroads GPS has Federal campaign activity as its "major purpose."

A. Overall Activities and Spending

Like another Section 501(c)(4) organization found by the FEC *not* to be a "political committee," Crossroads GPS "has engaged in a wide range of activities that are not directly related to federal campaign activity." MUR 5988 (American Future Fund), Factual and Legal Analysis at 7. Crossroads GPS also continues to operate *after* Election Day 2010.

B. Major Purpose Test Considerations

The Commission has no established test for "major purpose" that is reducible to a multi-factor test – *i.e.*, no "bright lines" exist. Rather, the Commission seeks to evaluate the major purpose of an organization based on relatively cryptic judicial statements. The Commission previously explained that "the major purpose doctrine . . . requires the flexibility of a case-by-case analysis of an organization's conduct that is incompatible with a one-size-fits-all rule." Supplemental Explanation and Justification on Political Committee Status, 72 Fed. Reg. at 5601. Those seeking to comply with the law are left to navigate a "totality of the circumstances" approach to "major purpose."

As three Commissioners recently explained, the "major purpose" test is a shield, not a sword:

The "major purpose" test is a judicial construct that spares some organizations from political committee registration and reporting, even though they have raised or spent more than \$1,000 on express advocacy; it is not the first prong of a two-prong test for political committee status. Instead, it is a judicial doctrine designed to protect organizations from the burdens of political committee registration, reporting and limitations, the reach of which is limited to "only encompass organizations that are under the control of a candidate or the major purpose of which is the nomination or election of a candidate."

MURs 5977 and 6005 (American Leadership Project), Statement of Reasons of Vice Chairman Petersen and Commissioners Hunter and McGahn at 8.

We bring to the Commission's attention the following passage from a recent decision of the Tenth Circuit Court of Appeals:

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There are two methods to determine an organization's 'major purpose': (1) examination of the organization's central organizational purpose; or (2) comparison of the organization's objectionable spending with overall spending to determine whether the preponderance of expenditures is for express advocacy or contributions to candidates.

New Mexico Youth Organized v. Herrera, 611 F.3d 669, 678 (10th Cir. 2010). The Commission's past practices appear to accord reasonably well with the 10th Circuit's formulation.

1. The Organization's Own Materials and Statements

Past enforcement cases often begin with an examination of the organization's own materials and statements, in accordance with *FEC v. Malenick*, 310 F.Supp.2d 230, 234-35 (D.D.C. 2004) and *FEC v. GOPAC, Inc.*, 917 F.Supp. 851, 859 (D.D.C. 1996). This inquiry is consistent with the first method described in *New Mexico Youth Organized* ("examination of the organization's central organizational purpose").

In its Articles of Incorporation, Crossroads GPS "is established primarily to further the common good and general welfare of the citizens of the United States of America by engaging in research, education, and communication efforts regarding policy issues of national importance that will impact America's economy and national security in the years ahead."

A more detailed mission statement of Crossroads GPS is publicly available on its website. It reads:

Crossroads GPS is a policy and grassroots advocacy organization that is committed to educating, equipping and mobilizing millions of American citizens to take action on the critical economic and legislative issues that will shape our nation's future in the years ahead.

Our goal is to provide a clear road map for concerned Americans on the most consequential issues facing our country, empowering them to set the direction of policymaking in Washington rather than being the disenfranchised victims of it.

It is no exaggeration to say that this is a watershed moment in America's history. Cataclysmic levels of debt, expansive government power, a nationalized health care system, a struggling economy and looming tax increases are all on the brink of reshaping and potentially devastating the great country we've all known.

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Meanwhile, enduring American values such as freedom, limited government, low taxes and individual responsibility are being trampled underfoot by Washington's political elite.

Crossroads GPS is dedicated to the belief that most Americans don't support the big-government agenda being forced upon them by Washington – and that most people, if equipped with the facts and a road map for action, will work to restore the core principles and values on which this country was founded.

Mission Statement of Crossroads GPS available at <http://crossroadsgps.org/learn-more>.

Crossroads GPS's website highlights the organization's policy goals, including its "7 in '11" National Action Plan, which lists "seven key priorities for legislative action this fall or in a 'lame-duck' session of Congress or in 2011." See <http://crossroadsgps.org/7-in-11>. The seven points in this plan are:

- 1. Guarantee Low Tax Rates that Encourage American Economic Growth*
- 2. Stop Congress' Reckless Waste of Taxpayer Money*
- 3. Aggressively Attack the National Debt*
- 4. Reform Health Care Responsibility, not Ideologically*
- 5. End the Bailout Culture*
- 6. Protect our Borders, Enforce our Laws*
- 7. Prioritize American Energy Development*

Each of these "action items" is explained in more detail on dedicated web pages designed to provide the public with educational information. See <http://crossroadsgps.org/7-in-11>.

Crossroads GPS's primary mission in 2010 and beyond is to advance the "7 in '11" National Action Plan. In doing so, the leadership of Crossroads GPS determined that engaging in *limited amounts* of express advocacy activity serves to advance the "7 in '11" National Action Plan. For example, Crossroads GPS's consistent advertising on wasteful spending projects contained in the 2009 "stimulus" legislation helped create a groundswell of opposition to "earmark"-oriented congressional spending, which led to the adoption of a ban on "earmarks" and bipartisan rejection of the "omnibus" spending bill during the most "lame duck" session of Congress. Ending "wasteful 'stimulus' spending and pork-barrel earmarks" is a specific policy objective of the "7 in '11" National Action Plan. In the same way, Crossroads GPS expects that its pointed criticism of the health care legislation passed by Congress in 2010 will enhance prospects for repealing or substantially scaling back that legislation in 2011.

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Complainants offer several statements, at Paragraphs 31-34 of the Complaint, derived from media stories and accounts, as "evidence" of Crossroads GPS's "major purpose." Complainants, however, offer nothing that could be construed as an organizational statement regarding any purpose of Crossroads GPS.

- At Paragraph 31 of the Complaint, Complainants refer to a *Washington Times* article. The language quoted in the Complaint is not a direct quotation from American Crossroads Chairman Mike Duncan, but rather, is nothing more than the author's paraphrasing. The article contains no quoted statements from any representative of Crossroads GPS concerning the "purpose" (major or otherwise) of Crossroads GPS.
- At Paragraph 32 of the Complaint, Complainants refer to statements made by Karl Rove. Mr. Rove holds no formal position with Crossroads GPS. Even so, the language quoted says nothing about the "purpose" of Crossroads GPS. Rather, Mr. Rove made the factually correct statement that donors who have "maxed out to the senatorial committee, the congressional committee or the RNC and would like to do more, under the Citizens United decision, you can give money to the American Crossroads 527, or Crossroads GPS...." Neither the *Think Progress* item cited in the Complaint, nor the original source material on *Fox News*, convey any information about the "purpose" of Crossroads GPS.
- At Paragraph 33 of the Complaint, Complainants cite a *Politico* story reporting "Crossroads GPS micro-targeting effort" was "focused on seven states - Colorado, Florida, Missouri, New Hampshire, Nevada, Ohio and Washington." Crossroads GPS engaged in micro-targeting efforts in these and other states. While Complainants appear to presume that "micro-targeting" is some sort of campaign tactic, it is simply research to identify distinguishing characteristics of people concerned about particular issues. "Micro-targeting" is performed by all manner of advocacy and commercial marketing organizations, and its purpose is to aid in more efficient and effective communications. Crossroads GPS's "micro-targeting" efforts tested its "7 in '11" National Action Plan.
- At Paragraph 34 of the Complaint, Complainants refer to another *Politico* story, but as is the case with the *Washington Times* article, the language highlighted by the Complainants is the author's characterizations. The cited *Politico* report contains no statements from any Crossroads GPS representative regarding the media buys referenced in the Complaint.

In short, the Complainants have not provided a single statement from any representative of Crossroads GPS that in any way suggests that the "major purpose" of Crossroads GPS is something other than the purpose set forth in its Articles of Incorporation or in its website mission statement. Moreover, a thorough review of Crossroads GPS's actual activities over the

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past year, along with its announced intentions for 2011, make clear what the organization's primary and major purpose is, notwithstanding mischaracterizations or stray comments contained in news stories.

2. Sufficiently Extensive Spending

Complainants also pursue the novel theory that "the enormity of Crossroads GPS's express advocacy expenditure activity establishes Crossroads GPS's 'major purpose' as influencing the 2010 federal elections." This language is derived from *Massachusetts Citizens For Life, Inc. v. FEC*, 479 U.S. 238 (1986). In that case, the Supreme Court noted that "should MCFL's independent spending become *so extensive* that the organization's major purpose may be regarded as campaign activity, the corporation would be classified as a political committee." *Id.* at 262 (emphasis added). See also Supplemental Explanation and Justification on Political Committee Status, 72 Fed. Reg. at 5601. While the *Massachusetts Citizens For Life* Court did not explain the "so extensive" standard (and never has), it is readily apparent that the Court examined the whole of the organization's activities. See *Massachusetts Citizens For Life, Inc.*, 479 U.S. at 242 ("Appellee has engaged in diverse educational and legislative activities designed to further its agenda.").

The Complainants do not explain how they reach the conclusion that Crossroads GPS has satisfied the "so extensive" test, but appear to presume that the test can be met simply by crossing some unspecified numeric threshold.

One recent enforcement decision includes language asserting that "[t]he Commission has consistently applied this standard in past matters." See MUR 5988 (American Future Fund), Factual and Legal Analysis at 6, n.2. We disagree with this characterization. In past matters, the Commission has cited the "so extensive" language of *Massachusetts Citizens For Life, Inc.*, and perhaps even claimed to use the standard, but it has never consistently applied the standard in a way that demonstrates any discernible factors. Three Commissioners appear to agree with this assessment:

Though an organization could theoretically satisfy 'the major purpose' test through independent spending that is 'so extensive' that the organization's major purpose may be regarded as campaign activity, neither Congress, nor the Commission, nor the courts have established any guidance on what constitutes sufficiently extensive spending."

MUR 5694 (Americans for Job Security, Inc.), Statement of Reasons of Vice Chairman Petersen and Commissioners Hunter and McGahn at 16-17.

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Two of these Commissioners (Petersen and Hunter) suggested separately that the Commission may lack authority to apply the "so extensive" standard because it has never been explained: "without any 'bright-line' rules that are easily understood and followed by those subject to them – contributors, recipients, and organizations – political committee status cannot be imposed on an entity." MUR 5842 (Economic Freedom Fund), Statement of Reasons of Vice Chairman Petersen and Commissioner Hunter at 24.

The Tenth Circuit Court of Appeals recently determined that the "major purpose" standard cannot be satisfied by simply crossing an arbitrary numeric threshold. The court considered the validity of New Mexico's "political committee" standard, which provided that "a \$500 a year expenditure for political purposes is sufficient to establish that the organization's major purpose is political and thus to trigger the requirement that the organization register as a political committee." *New Mexico Youth Organized v. Herrera*, 611 F.3d 669, 677 (10th Cir. 2010). The court concluded:

here, an organization that spends \$500 on an election-related expense is automatically subject to the reporting requirements and other limitations imposed on a political committee, regardless of what percentage of operating funds that \$500 constitutes or what else the organization spends its resources on. To automatically classify such organizations as political committees contradicts the Supreme Court's repeated admonition that only organizations that have "the major purpose" of electing or defeating a candidate may be forced to register as political organizations.

Id. at 679.

Assuming for the sake of argument that the "so extensive" standard may be fairly applied in this matter, that standard cannot possibly be satisfied by simply crossing an arbitrary numeric threshold, but rather, must necessarily be based on some proportional comparison of Federal campaign activity to overall organizational activity. See *New Mexico Youth Organized v. Herrera*, 611 F.3d at 678 (describing the second method of determining an organization's "major purpose" as a "comparison of the organization's electioneering spending with overall spending to determine whether the preponderance of expenditures is for express advocacy or contributions to candidates").

By inquiring into an organization's "major purpose," it is implied that one is evaluating all of the organization's various purposes in order to determine if Federal campaign activity is indeed the organization's "major purpose." As the Tenth Circuit explained in *New Mexico Youth Organized*, it cannot be the case that if an organization simply spends x amount of dollars on campaign activity, then its "major purpose" is automatically campaign activity.

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For example, the *Wall Street Journal* reported that the American Federation of State, County and Municipal Employees (AFSCME) "is now the biggest outside spender of the 2010 elections" and "is spending a total of \$87.5 million on the elections after tapping into a \$16 million emergency account to help fortify the Democrats' hold on Congress." Brady Mullins and John D. McKinnon, "Campaign's Big Spender; Public-Employees Union Now Leads All Groups in Independent Election Outlays," *Wall Street Journal*, Oct. 22, 2010 available at http://online.wsj.com/article/SB10001424052702303339504575566481761790288.html?mod=djemITP_h. (This figure was raised to \$91 million in an October 26 report in the *New York Times*.¹⁸) Media reports indicate that this figure was virtually the entirety of the union's total assets.¹⁹

As far as we know, Complainants (as of the date of this filing) have not argued to the FEC that the "enormity" of AFSCME's election spending, an amount far greater than that of Crossroads GPS in both nominal and percentage terms, means that AFSCME has the "major purpose" of engaging in Federal campaign activity. Complainants' argument is not rooted in any actual legal authority, is contrary to recent court decisions, and appears to be of value only in filing harassing complaints against those who do not support their far-left agendas. Where the object of the inquiry is "the major purpose" of the organization, the "enormity" of the organization's political expenditures is meaningful only in relation to its overall activities.

The General Counsel's Brief issued in MUR 5542 (Texans For Truth) seems to reflect this view. For example, at pages 11-12, the General Counsel:

In its entire existence, TFT has engaged in no activities (other than routine administrative activities and defending itself in this matter) that did not have to do with the presidential election....TFT was not formed until the week of the Republican National Convention and engaged in no activity after the election. It never advocated a candidate in, or even commented on, any other 2004 election, either federal or non-federal, and engaged in no advocacy, advertising, lobbying or any other activity that did not directly relate to the 2004 presidential election.

¹⁸ Steven Greenhouse, "Union Spends \$91 Million on Midterms," *New York Times*, Oct. 26, 2010, available at <http://thecaucus.blogs.nytimes.com/2010/10/26/union-spends-91-million-on-midterms/>.

¹⁹ Iain Murray and F. Vincent Vernuccio, "The Enemy Within," *National Review* (Dec. 20, 2010) ("The 1.6-million-member organization spent almost \$90 million — a stunning amount given that the union had only \$97.4 million in assets in 2009. AFSCME was forced to use a \$16 million emergency account and take out a \$2 million loan to pay for its political activities.") available at <http://www.nationalreview.com/articles/255038/enemy-within-ian-murray>.

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While perhaps not fully articulated, it appears that – in MUR 5542 at least – the Commission approached the “so extensive” question not in terms of nominal dollars spent, but in terms of campaign activities *in relation to* other activities. In other matters from the same period, however, the Commission’s methodology is far less clear.

A simple comparison of the amount spent by Crossroads GPS on express advocacy communications (\$15,445,039.50) versus the amount spent on other, non-express advocacy activities (approximately \$23.7 million) in its first 6 months of existence, demonstrates quite clearly that the “major purpose” of Crossroads GPS is *not* Federal campaign activity. Rather, the major purpose of Crossroads GPS is grassroots lobbying, issue advocacy and education of the general public.

V. Conclusion

For the reasons set forth above, we urge the Commission to quickly dismiss this Complaint. Complainant has failed to present any actual evidence of wrongdoing. In fact, despite the length of Complainant’s submission, it does not meet the basic requirements for a Complaint set forth in MUR 4960 (Hillary Clinton) as it rests entirely on “unwarranted legal conclusions,” most of which are a product of Complainants’ fabricated legal standards.

Sincerely,



Thomas J. Josefiak

Michael Bayes

Counsel to Crossroads GPS

Attachments

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CROSSROADS GPS TV:30 – "Calendar"

VIDEO	AUDIO
<p>Michael Bennet's Spending Spree</p> <p>Michael Bennet Since his appointment: Voted to spend an average \$2.5 billion/ day. U.S. Senate records, thru 8/5/10.</p> <p><u>We leaf through a calendar and stop on the following pages, with amount spent.</u> <u>(The calendar does not necessarily reflect what is being spent in the VQ copy.)</u></p> <p><u>Graphic/ Calendar:</u> February 13, 2009 Bennet spent \$787 billion H.R. 1, Roll Call Vote #64, 2/13/09</p> <p><u>Graphic/ Calendar:</u> March 10, 2009 Spent \$410 billion H.R. 1105, Roll Call Vote #96, 3/10/09</p> <p><u>Graphic/ Calendar:</u> June 18, 2009 Spent \$106 billion H.R. 2346, Roll Call Vote #210, 6/18/09</p> <p><u>Graphic/ Calendar:</u> August 6, 2009 Spent \$2 billion H.R. 3435, Roll Call Vote #270, 8/6/09</p>	<p>Music Annrc: Michael Bennet's spending spree. Since his appointment, Bennet has voted to spend \$2.5 billion every single day.</p> <p>Spending billions of your tax dollars on everything from the failed stimulus billions in government pork even cash for clunkers.</p>
<p><u>Graphic/ Calendar:</u> December 24, 2009 Vote to increase Debt \$290 Billion H.R. 4314, Vote #397, 12/24/09,</p> <p><u>Graphic/ Calendar:</u> January 28, 2010 Increase Debt again \$1.9 Trillion H.J.Res 45, Vote #14, 1/28/10</p>	<p>And to pay for some of it? ... Bennet voted twice in 35 days to increase the national debt.</p>

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<p>Graphic/ Calendar: March 10, 2010 Spent \$34 billion H.R. 4213, #48, 3/10/10</p> <p>Spend More</p> <p>March 17, 2010 Spent \$18 billion H.R. 2847, Roll Call Vote #55: 3/17/10</p> <p>Borrow More</p> <p>May 27, 2010 Spent \$58.8 billion H.R. 4899, Roll Call Vote #176, 5/27/10</p> <p>Then raise our taxes.</p>	<p>Bennet's way: Spend more ... borrow more</p> <p>... and then raise our taxes.</p>
<p>Michael Bennet's spending spree.</p>	<p>Michael Bennet's spending spree.</p>
<p><u>SUPER:</u> Tell Snnator Bennet Stop the Spending Vote No on S. Amdt. 4594 Call: (866) 455-9866 <u>Paid for by Crossroads GPS</u> <u>www.CrossroadsGPS.org</u></p>	<p>Call Senator Bennet. Stop the Spending.</p>

GPS TV:30 "Thanks Harry"

Scene	VIDEO	AUDIO
1	SUPER: ObamaCare Bad For Health Care In America Worse for Nevada	ANNOUNCER: ObamaCare is bad for health care in America ...and worse for Nevada.
2	SUPER: Because When Senator Harry Reid Needed Votes	Because, when Senator Harry Reid needed votes to push ObamaCare,
3	SUPER: Senator Harry Reid Cut Deals To Push ObamaCare Cite: cbsnews.com 12/21/09	He cut sweet deals across the country...
4	SUPER: Harry Reid Helped Nebraska	to help Nebraska . . .
5	SUPER: Harry Reid Helped Louisiana.	to help Louisiana . . .
6	SUPER: Harry Reid Helped Florida	to even help Florida.
7	SUPER: What has Nevada Gotten From Senator Reid? Nevada Has The Highest Unemployment Rate In Nation	What has Nevada gotten From Senator Reid? Record foreclosures and the highest unemployment rate in the nation.
8	SUPER: Reid's Pushing More Govt. Control Of Your Healthcare	And Reid's still pushing for even more government control of your health care,
9	Super: Help For Nevada? Tell Harry Reid: Nevada Needs Jobs Not Government-Run HealthCare. Call: 775-882-7343	Really Harry, how about some help for Nevada?
10	PAID FOR BY CROSSROADS GRASSROOTS POLICY STRATEGIES. WWW.CROSSROADSGPS.ORG	

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GPS TV:30 -"Lawsuit"

VIDEO	AUDIO
<p>Graphic: 71% Don't Want Government-Mandated Health Care</p> <p>Health Care shots. We want to make <u>our own</u> health care decisions.</p>	<p>Music Annrc: The message is clear.</p> <p>71% of Missouri voters don't want government-mandated health care.</p> <p>We want to make <u>our own</u> health care decisions.</p>
<p>Carnahan Robin Carnahan disagrees With Missouri voters</p>	<p>But Robin Carnahan disagrees.</p>
<p>St. Louis Post-Dispatch: "Missouri voters rejected a federal mandate to purchase health insurance ..."</p> <p>Carnahan: Carnahan sided with Lobbyists/ Unions/ Washington</p>	<p>While 71% of <u>us</u> voted NO ...</p> <p>... Carnahan sided with lobbyists, big unions, and Washington insiders to force ObamaCare on us.</p>
<p>Lt. Governor suing the Federal Government</p>	<p>Missouri's Lt. Governor is suing the Federal Government so we can keep <u>our</u> health care.</p>
<p>SUPER: Tell Robin Carnahan – Get in touch with Missourians Support the health care challenge Call (573) 751-4936 www.CrossroadsGPS.org PAID FOR BY CROSSROADS GRASSROOTS POLICY STRATEGIES</p>	<p>Tell Carnahan to get in touch with Missourians ... and support the health care challenge.</p>

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VIDEO	AUDIO
<p>Video: Image of depressed Pennsylvanians, for sale signs</p>	<p>V/O: We're hurting...</p>
<p>Super: "Unemployment stuck at 9.5%" Source: Philadelphia Inquirer, 8/7/10</p>	
<p>Video: Image pulls back to show Sestak in the "Capitol" with sad Pennsylvanians seen through a window behind him</p>	<p>But what are they doing in Washington?</p>
<p>Super: Joe Sestak voted for Big Government Health Care Source: CQ Vota #165, 3/21/10</p>	<p>Congressman Joe Sestak voted for Obama's big-government health care scheme...</p>
<p>Super: \$525 billions in job killing taxes Source: CBO, April 12th, 2010</p>	<p>...billions in job killing taxes...</p>
<p>Super: Insurance premiums: Additional \$2100 a year for families Source: CBO, November 30, 2009</p>	<p>And higher insurance premiums for hard hit families...</p>
<p>Super: \$500 billion less for Medicare Source: The Washington Post, March 19, 2010</p>	<p>Even worse, Sestak voted to gut Medicare, a \$500 billion dollar cut.</p>
<p>Super: Cutting 850,000 Seniors' Medicare Benefits Source: The Henry J. Kaiser Family Foundation</p>	<p>....Reduced benefits for 850,000 Pennsylvania seniors</p>
<p>Super: Higher taxes & higher premiums, fewer jobs... Medicare cuts</p>	<p>Higher taxes and premiums, fewer jobs... Medicare cuts.</p>
<p>Super: The Sestak/ Obama plan... costs us too much</p>	<p>The Sestak/Obama plan costs us too much.</p>
<p>Super: Call 610-892-8028. Tell Joe Sestak, stop the Medicare cuts. Disclaimer: Paid for by Crossroads Grassroots Policy Strategies www.crossroadsgps.org</p>	<p>Tell Congressman Sestak, stop the Medicare cuts.</p>

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GPS TV:30"Wrong-Way"

Scene	VIDEO	AUDIO
1	Obama. Health care shot. Higher taxes/Medicare Cuts /Higher Premiums/	ANNOUNCER: Obamacare is taking health care in the wrong direction.
2	WRONG WAY sign. Jack Conway (official title) pic comes in. Medical shot in background.	And Jack Conway has gone the WRONG way, too.
3	SUPER: Conway Endorsed ObamaCare Higher Taxes, Medicare Cuts	Conway endorsed ObamaCare, with its higher taxes and Medicare cuts.
4	SUPER: Conway Refused to Defend Kentucky from Obama's Health Care Mandate	And Conway refused to join 13 other attorneys general
5	Shot continues Cite: Tom Loftus, The Courier-Journal, 3/25/10	... and defend Kentucky from Obama's health care mandate.
6	Obama and Conway facing one direction. Wrong Way sign ObamaCare Higher taxes/Medicare Cuts /Higher Premiums	ObamaCare and Jack Conway are taking Kentucky's health care down the wrong road.
7	Conway spins 180 degrees away from Obama. Super: Tell Jack Conway Stop Defending ObamaCare Protect Kentucky from the Insurance Mandate Call: 502-696-5300	Tell Jack Conway: turn around. Stop defending ObamaCare and protect Kentucky from the federal insurance mandate.
8	PAID FOR BY CROSSROADS GRASSROOTS POLICY STRATEGIES. WWW.CROSSROADSGPS.ORG	

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CROSSROADS GPS TV:30 -- "Worried"

VIDEO	AUDIO
<p>U.S. Capitol and Senior B-Roll</p> <p><u>SUPER:</u> California seniors are worried.</p>	<p>(Music Up and Under) <u>ANNOUNCER:</u> California seniors are worried.</p>
<p><u>Barbara Boxer</u> Voted to Cut Medicare \$500 billion <u>CITES:</u> H.R. 4872, Vote #105, 3/25/10 CBSNews.com, 3/21/10</p>	<p>Barbara Boxer voted to cut spending on Medicare benefits by 500 billion dollars.</p>
<p><u>Hospital B-Roll</u> <u>Washington Post Masthead</u> "...hospitals and nursing homes... could stop taking Medicare altogether." <u>CITE:</u> Washington Post, 11/15/09</p>	<p>Cuts "... so costly to hospitals and nursing homes that they could stop taking Medicare altogether."</p>
<p><u>Doctor and Senior B-Roll</u> <u>Washington Post masthead</u> "...would sharply reduce benefits for some senior citizens..." "...could jeopardize access to care for millions of others..." <u>CITE:</u> Washington Post, 11/15/09</p>	<p>Boxer's cuts would "... sharply reduce benefits for some ... and "... could jeopardize access to care for millions of others."</p>
<p><u>Broll</u> Millions WON'T be able to keep plans or doctors Centers for Medicare & Medicaid Services, 4/10</p>	<p>And millions of Americans WON'T be able to keep the plan or doctor they already have.</p> <p>Check the facts and take action.</p>
<p><u>SUPER:</u> Tell Barbara Boxer Stop the Medicare Cuts Call: (415) 403-0100 www.CrossroadsGPS.org PAID FOR BY CROSSROADS GRASSROOTS POLICY STRATEGIES</p>	<p>Call Boxer. Stop the Medicare Cuts</p>

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CROSSROADS GPS TV:30 "Debt Clock"

VIDEO	AUDIO
<p>National Debt Clock Coloradans are in debt to Washington deeply in debt.</p>	<p>Music Anncr: Coloradans are in debt to Washington deeply in debt.</p>
<p>Big Spender Michael Bennet Spending an average \$2.5 Billion per day. U.S. Senate Records, through 8/5/10</p> <p>[Spent <u>Billions</u> on the <u>failed</u> stimulus:H.R. 1, Roll Call Vote #64, 2/13/09]</p> <p>Stimulus? Research on ants H.R. 1, Roll Call Vote #64, 2/13/09</p> <p>Effects of cocaine on monkeys. H.R. 1, Roll Call Vote #64, 2/13/09</p>	<p>Big spenders, like Michael Bennet, are spending an average \$2.5 <u>billion</u> per day...</p> <p>... wasting <u>billions</u> on pork in the <i>failed</i> stimulus program.</p>
<p>The result</p> <p>... over 100,000 Colorado jobs lost The Denver Post, 07/01/10</p> <p>U.S. bankruptcies hit five year high Reuters, 8/17/10</p>	<p>The result?</p> <p>... over 100,000 Colorado jobs lost ...</p> <p>... bankruptcies at a five year high.</p>
<p>Debt Clock National debt could break this country \$13,310,379,000,000.00 \$44,000 PER CITIZEN... Washington Post, 3/21/09</p>	<p>... and our national debt is hitting numbers that could break this country.</p>
<p>Bennet: "In my view we have nothing to show for it." Greeley Gazette, 8/24/10</p>	<p>Now Bennet's admitted, "In my view we have <u>nothing to show for it.</u>" Ya' think?</p>
<p>Debt Clock SUPER: Tell Senator Bennet Stop the Spending Spree Vote No on S. Amdt. 4594 Call: (866) 455-9866 PAID FOR BY CROSSROADS GRASSROOTS POLICY STRATEGIES WWW.CROSSROADSGPS.ORG</p>	<p>Call. Tell Bennet to stop the spending spree.</p>

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GPS TV:30"Bad Sign"

Scene	VIDEO	AUDIO
1	<p>Obama in rearview Sign: "Obamacare: Intrusive Government Mandates!" Wrong way sign, Conway pic Wrong way sign, with 'Conway' dangling.</p>	<p>ObamaCare is the WRONG way for Kentucky. And Jack Conway is going the wrong way too.</p>
2	<p>From car perspective through front window. B-roll shots in rear view mirror. Signs on side of road: ObamaCare: \$525 Billion in Job Killing Taxes Conway face sign, with 'Conway' dangling.</p>	<p>Obamacare means \$525 Billion in job killing taxes</p>
3	<p>Sign on side of road: ObamaCare: Higher Health Insurance Premiums \$2100 per family</p>	<p>It means higher insurance premiums</p>
4	<p>ObamaCare: \$500 billion cut from Medicare Wrong Way sign</p>	<p>\$500 billion cut from Medicare</p>
5	<p>Another sign; senior in rearview mirror Sign: ObamaCare: Cutting 113,000 Kentucky Seniors' Medicare Benefits Wrong Way sign.</p>	<p>Reduced Benefits for 113,000 Kentucky seniors</p>
6	<p>Sign: ObamaCare: Intrusive Government Mandates! Conway face sign, with 'Conway' dangling.</p>	<p>And intrusive big government mandates.</p>
7	<p>Car stops for end signs. Super: Tell Jack Conway Fight the Insurance Mandate Fight ObamaCare Call: 502-696-5300</p>	<p>It's the wrong way, Conway.</p>
8	<p>CROSSROADS GRASSROOTS POLICY STRATEGIES (CROSSROADS GPS) IS RESPONSIBLE FOR THE CONTENT OF THIS ADVERTISING. PAID FOR BY CROSSROADS GRASSROOTS POLICY STRATEGIES. NOT AUTHORIZED BY ANY CANDIDATE OR CANDIDATE'S COMMITTEE. WWW.CROSSROADSGPS.ORG</p>	<p>Crossroads GPS is responsible for the content of this advertising.</p>

14044350788

GPS TV: "Thanks a Lot"

TV :30

Scene	VIDEO	AUDIO
1	Capitol/Money SUPER: Harry Reid's \$814 Billion "Stimulus"	ANNOUNCER: With spending already out of control, Harry Reid spearheaded the stimulus-spending bill.
3	b-roll stock shots of Ants SUPER: \$1.9 million To California.	Harry's stimulus sent nearly \$2 million to California to collect ants in Africa. (SFX: Ants marching)
4	b-roll stock chairlifts, snow-making. SUPER: Over \$25 Million to Vermont.	\$25 million for new chairlifts and snowmaking in Vermont. (SFX: Snow making)
5	b-roll stock shot of Venus. SUPER: \$300,000 to Texas.	Almost \$300K to Texas to study weather on Venus. (SFX: rain and thunder)
6	NV unemployment/foreclosure shot SUPER: Nevada - Highest Unemployment Record Foreclosures	Meanwhile, back in Nevada, we still have the highest unemployment and record foreclosures.
7	Super: Tell Senator Reid: Nevada Needs Jobs – Not More Spending Vote No on S. Amdt. 4594 Call: 775-882-7343 CROSSROADS GRASSROOTS POLICY STRATEGIES (CROSSROADS GPS) IS RESPONSIBLE FOR THE CONTENT OF THIS ADVERTISING. PAID FOR BY CROSSROADS GRASSROOTS POLICY STRATEGIES. NOT AUTHORIZED BY ANY CANDIDATE OR CANDIDATE'S COMMITTEE. WWW.CROSSROADSGPS.ORG	Really Harry, how about some help for Nevada? Crossroads GPS is responsible for the content of this advertising.

14044350789

Crossroads GPS TV30 – "Baby"

VIDEO	AUDIO
<p><u>A newborn baby in a hospital Neo-natal section</u></p> <p><u>Nurse and Baby</u></p> <p><u>Mom and child at doctors</u></p>	<p><u>Music</u> <u>Anngr:</u> She begins her life in the care of others. But what kind of care <i>will</i> be there ... in her <u>future</u>.</p> <p>Missourians want to make their <u>own</u> health care decisions.</p>
<p><u>Carnahan</u> Robin Carnahan disagrees</p>	<p>But Robin Carnahan disagrees.</p>
<p><u>Carnahan and Obama</u> Carnahan Supports Obamacare</p> <p><u>Family</u> Could raise insurance premiums \$2100.</p> <p><u>Seniors</u> Cuts \$600 billion from Medicare</p>	<p>She supports the ObamaCare law... ... and could raise our health insurance premiums.</p> <p>... that cuts billions from Medicare ...</p>
<p><u>Lawsuit:</u> Lt. Governor suing the Federal Government</p> <p><u>Baby, reprise.</u></p>	<p>Now, our Lt. Governor <i>is suing</i> ...</p> <p>... so her health care <i>will be there</i>.</p>
<p><u>SUPER:</u> Tell Robin Carnahan - Start fighting for Missouri! Support the Lieutenant Governor's challenge. Call:(573) 751-4936</p> <p>CROSSROADS GRASSROOTS POLICY STRATEGIES (CROSSROADS GPS) IS RESPONSIBLE FOR THE CONTENT OF THIS ADVERTISING. PAID FOR BY CROSSROADS GRASSROOTS POLICY STRATEGIES. NOT AUTHORIZED BY ANY CANDIDATE OR CANDIDATE'S COMMITTEE. WWW.CROSSROADSGPS.ORG</p>	<p>Tell Carnahan: Start fighting for Missouri, Fight against Obamacare.</p> <p>Crossroads GPS is responsible for the content of this advertising.</p>

14944350790

CROSSROADS GPS TV:30 "Debt Clock Long"

VIDEO	AUDIO
<p>National Debt Clock Coloradans are in debt to Washington deeply in debt.</p>	<p>Music Annrc: Coloradans are in debt to Washington deeply in debt.</p>
<p>Big Spender Michael Bennet Spending an average \$2.5 Billion per day. U.S. Senate Records, through 8/5/10</p> <p>[Spent <u>Billions</u> on the <u>failed</u> stimulus:H.R. 1, Roll Call Vote #64, 2/13/09]</p> <p>Stimulus? Research on ants H.R. 1, Roll Call Vote #64, 2/13/09</p> <p>Effects of cocaine on monkeys. H.R. 1, Roll Call Vote #64, 2/13/09</p>	<p>Big spenders, like Michael Bennet, are spending an average \$2.5 <u>billion</u> per day...</p> <p>... wasting <u>billions</u> on pork in the <i>failed</i> stimulus program.</p>
<p>The result</p> <p>... over 100,000 Colorado jobs lost <i>The Denver Post</i>, 07/01/10</p> <p>U.S. bankruptcies hit five year high Reuters, 8/17/10</p>	<p>The result?</p> <p>... over 100,000 Colorado jobs lost ...</p> <p>... bankruptcies reaching a five year high.</p>
<p>Debt Clock National debt could break this country \$13,310,379,000,000.00 \$44,000 PER CITIZEN... Washington Post, 3/21/09</p>	<p>... and our national debt could break this country.</p>
<p>Bennet: "in my view we have nothing to show for it." Greeley Gazette, 8/24/10</p>	<p>Now Bennet's admitted, "in my view we have nothing to show for it." Ya' think?</p>
<p>Debt Clock SUPER! Tell Senator Bennet Stop the Spending Spree Vote No on S. Amdt. 4594 Call: (866) 465-9866 CROSSROADS GRASSROOTS POLICY STRATEGIES (CROSSROADS GPS) IS RESPONSIBLE FOR THE CONTENT OF THIS ADVERTISING. PAID FOR BY CROSSROADS GRASSROOTS POLICY STRATEGIES. NOT AUTHORIZED BY ANY CANDIDATE OR CANDIDATE'S COMMITTEE. WWW.CROSSROADSGPS.ORG</p>	<p>Call. Tell Bennet to stop spending.</p> <p>Crossroads GPS is responsible for the content of this advertising.</p>

14044350791

**Crossroad GPS
TV:30 "What"**

VIDEO	AUDIO
<p>Video: Sad family Super: 592,349 Pennsylvanians unemployed Source: Bureau of Labor Statistics.</p>	<p>VO: Over half a million Pennsylvanians unemployed... And what's Congressman Joe Sestak done?</p>
<p>Super: Sestak Voted to cut Medicare \$500 billion Source: HR3050, CQ RC Vote 185, March 21, 2010</p>	<p>He voted to gut Medicare....</p>
<p>Super: Reducing benefits for 854,489 seniors Source: Henry J Kaiser Foundation</p>	<p>Slashing benefits for Pennsylvania seniors.</p>
<p>Super: Sestak... "could jeopardize access to care for millions..." Source: Washington Post, 11/15/09</p>	<p>And the Obama-Sestak scheme... "could jeopardize access to care for millions...."</p>
<p>Super: Sestak raised taxes \$525 billion.... Devastating small businesses... killing jobs Source: Congressional Budget Office, 4/12/10</p>	<p>Sestak even voted to raise taxes over five hundred billion dollars, ...devastating Pennsylvania small businesses... killing jobs</p>
<p>Super: Gutting Medicare. Hurting Seniors. Killing jobs.</p>	<p>Gutting Medicare. Hurting seniors. Killing jobs....</p>
<p>Super: Pennsylvania can't afford Joe Sestak.</p>	<p>Pennsylvania can't afford Joe Sestak</p>
<p>Super: CROSSROADS GRASSROOTS POLICY STRATEGIES (CROSSROADS GPS) IS RESPONSIBLE FOR THE CONTENT OF THIS ADVERTISING. PAID FOR BY CROSSROADS GRASSROOTS POLICY STRATEGIES. NOT AUTHORIZED BY ANY CANDIDATE OR CANDIDATE'S COMMITTEE. WWW.CROSSROADSGPS.ORG</p>	<p>Crossroads GPS is responsible for the content of this advertising.</p>

14044350792

Crossroads GPS TV30 - "Review"

VIDEO	AUDIO
<p><u>Hollywood premiere with searchlights</u> <u>Movie Poster of Carnahan</u> Super: New ads, by (signature signs on) Robin Carnahan.</p>	<p>Music Annrc: <u>New ads by Robin Carnahan.</u></p>
<p><u>Hollywood Movie Marquee</u> <u>Carnahan's photo on the marquee</u> Negative Ads Robin Carnahan 'SUPERS "... false ..." "... phony..." "... misleading..."</p>	<p>The reviews are in ...</p> <p>... false phony... ... misleading ...</p>
<p>Movie Poster: Robin Carnahan 30 Seconds of Smear An Obama/Pelosi Production</p>	<p>Robin Carnahan ... co-starring in an Obama/Pelosi production</p>
<p><u>Trophy: Best Fiction</u> Winner: "Best Fiction" for saying her opponent received the most from lobbyists ... "... not true ..." News-Leader</p>	<p>Winner: "Best Fiction" for saying her opponent received the most from lobbyists ... but "<u>not true</u>".</p>
<p><u>The Star Newspaper:</u> Robin Carnahan "should know better". -Kansas City Star</p>	<p>The Star says, Carnahan "should know better".</p>
<p><u>SUPER:</u> Too dishonest. Too Liberal. Two thumbs down. (over disclaimer) Say NO to Robin Carnahan. CROSSROADS GRASSROOTS POLICY STRATEGIES (CROSSROADS GPS) IS RESPONSIBLE FOR THE CONTENT OF THIS ADVERTISING. PAID FOR BY CROSSROADS GRASSROOTS POLICY STRATEGIES. NOT AUTHORIZED BY ANY CANDIDATE OR CANDIDATE'S COMMITTEE. WWW.CROSSROADSGPS.ORG</p>	<p>Robin Carnahan: Too dishonest. Too liberal. Two thumbs down.</p> <p>Crossroads GPS is responsible for the content of this advertising.</p>

14044350793

Crossroads GPS

"Can't Afford Patty"

1 X :30 TV

VIDEO	AUDIO
Back of woman's head in radio station talking into microphone (re-creation) Graphic: Patty Murray, September, 1992 Graphic: KUOW Radio Debate Graphic - Audio text highlighted	WOMAN V/O "A 4 trillion dollar debt, 9 million people out of jobs . . ."
Graphic: Patty Murray 1992 Graphic: \$4 Trillion Nat'l Debt. Graphic: 9 Million Unemployed.	ANNCR: When Patty Murray first ran for senate, she promised to tackle big problems.
Graphic - Audio text highlighted	"We have a federal government that has failed to deal with these problems."
Graphics: Years tick by 18 years of Patty Murray What's Changed?	ANNCR: So, what difference has Patty Murray made after 18 years in Washington, DC?
Patty continues rising on \$\$ \$14 Trillion National Debt Higher Unemployment Tax Increases	She's increased our national debt by trillions And now she wants to raise taxes to help pay for it.
Money pushes her off the screen Graphic: We Can't Afford 6 More Years of Patty Murray	We just can't afford six more years of Patty Murray.
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**Crossroads GPS
:30 TV "Add Up"**

VIDEO	AUDIO
<p>Video: Image of Sestak next to a large calculator...</p> <p>Super: Joe Sestak's Reckless Spending Adds Up.</p> <p>Video: Calculator adds up the spending</p> <p>Super: Joe Sestak... 102 earmarks... \$104 million.</p> <p>Automakers, \$14 Billion Wall Street, \$700 Billion</p> <p>Super: Sestak voted for the failed stimulus... \$814 Billion</p> <p>Super: Sestak voted for massive healthcare takeover \$1 Trillion</p> <p>Video: Calculator breaks</p> <p>Super: Joe Sestak... trillions wasted</p> <p>Super: Sestak increase national debt limit... 4 times</p> <p>Super: Joe Sestak... reckless spending... higher debt... killing jobs. Wrong for Pennsylvania</p>	<p>VO: With Joe Sestak... the reckless spending adds up fast.</p> <p>There's Sestak's earmarks... over a hundred in just 3 years...</p> <p>Sestak backed bailouts for automakers and banks...</p> <p>And Sestak voted for Pelosi's failed stimulus...</p> <p>And Obama's massive healthcare takeover...</p> <p>Trillions of dollars wasted...</p> <p>While Sestak voted repeatedly to increase the national debt limit... adding trillions of dollars</p> <p>Joe Sestak... reckless spending... higher debt... killing jobs... wrong for Pennsylvania.</p>
<p>CROSSROADS GRASSROOTS POLICY STRATEGIES (CROSSROADS GPS) IS RESPONSIBLE FOR THE CONTENT OF THIS ADVERTISING. PAID FOR BY CROSSROADS GRASSROOTS POLICY STRATEGIES. NOT AUTHORIZED BY ANY CANDIDATE OR CANDIDATE'S COMMITTEE. WWW.CROSSROADSGPS.ORG</p>	<p>Crossroads GPS is responsible for the content of this advertising.</p>

14044350795

37

Crossroads GPS

TV:30 "You Guessed It"

Scene	VIDEO	AUDIO
1	Photo album rotates onto screen. Jack Conway OC SUPER: Jack CON-Way	Jack CON-Way sure lives up to his name.
2	SUPER: "I've represented those who can't stand up for themselves."	JACK OC: "I've represented those who can't stand up for themselves."
3	SUPER: CONWay's job to represent the people Shots of water faucet, gas stove, lamp.	Yet it's CON-way's job to represent the people in negotiating utility rates,
4	SUPER: Utility Rates Up \$175 Million sub head: On Kentucky Families.	But under CON-way's watch, rates have gone up millions on Kentucky families.
5	Turo page to shot of Conway. SUPER: Conway Receives Stock Distributions. 2009: \$157,500, 2010: \$106,000 Total: \$263,500	While Jack CON-Way PERSONALLY received huge stock distributions from... you guessed it, a utility company.
6	SUPER: CONway Helps Himself. SUPER: Kentucky Families Pay	Politicians helping themselves, sticking us with the bill. That's the Jack CON-Way.
7	CROSSROADS GRASSROOTS POLICY STRATEGIES (CROSSROADS GPS) IS RESPONSIBLE FOR THE CONTENT OF THIS ADVERTISING. PAID FOR BY CROSSROADS GRASSROOTS POLICY STRATEGIES. NOT AUTHORIZED BY ANY CANDIDATE OR CANDIDATE'S COMMITTEE. WWW.CROSSROADSGPS.ORG	Crossroads GPS is responsible for the content of this advertising.

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Crossroads GPS
:30 TV
"Claim"

14044350797

VIDEO	AUDIO
<p>Video: Shredder and TV Super: Alexi Giannoulias Bright Start</p> <p>Video: Alexi's ad plays</p> <p>Super: "...bad investment choices...leading to outsized losses" Source: Chicago Sun Times, 1/14/09</p> <p>Super: "Parents Suffered A Total Loss Of Around \$150 Million" Crain's Chicago Business, 12/22/09</p> <p>Video: Child getting a diploma... then picture shredded. Super: Parents trusted Alexi... Alexi let them down.</p> <p>Super: Broken promises... financial neglect... a dishonest campaign...</p> <p>Super: Illinois' can't afford any more Alexi.</p> <p>SUPER: CROSSROADS GRASSROOTS POLICY STRATEGIES (CROSSROADS GPS) IS RESPONSIBLE FOR THE CONTENT OF THIS ADVERTISING. PAID FOR BY CROSSROADS GRASSROOTS POLICY STRATEGIES. NOT AUTHORIZED BY ANY CANDIDATE OR CANDIDATE'S COMMITTEE. WWW.CROSSROADSGPS.ORG</p>	<p>VO: It's Alexi Giannoulias' claim to fame... the Bright Start college savings fund.</p> <p>AG: "We're helping parents and grandparents put money away for their kids to go to college."</p> <p>VO: But Illinois families LOST money with Giannoulias in charge...</p> <p>Millions of dollars saved up for kids to go to college... gone...</p> <p>Parents trusted Alexi... and Alexi let them down.</p> <p>Broken promises... financial neglect... a dishonest campaign...</p> <p>Illinois' can't afford any more Alexi.</p> <p>Crossroads GPS is responsible for the content of this advertising.</p>

Crossroads GPS

TV 30:

Title: "Choice"

Video

Audio

VIDEO: Pictures of Rubio and Crist
CG: The choice is clear

The choice is clear.

VIDEO: Pic of Rubio
CG: Rubio Stood up for taxpayers
CG: Opposed Obama's Stimulus

Marco Rubio stood up for taxpayers by saying no to the failed Obama "stimulus".

VIDEO: Hug Photo
CG: Crist Embraced Obama
CG: And Failed Stimulus

Charlie Crist embraced it.

VIDEO: Pic of Rubio
CG: Rubio Opposed ObamaCare
CG: Opposed Medicare cuts

Marco Rubio opposed ObamaCare with its \$500 billion Medicare cuts.

VIDEO: Pic of Crist
CG: Crist flip flopped

Charlie Crist...has flip-flopped

VIDEO: Pic of Rubio
CG: Rubio NO to Obama's job-killing energy tax

Marco Rubio says no to Obama's job-killing cap-and-trade energy tax.

VIDEO: Pic of Crist
CG: Crist SUPPORTS Obama's job-killing energy tax

But Crist was pushing it even before Obama was elected.

VIDEO: Pic of Rubio
CG: A check on Obama's Agenda

Florida needs a strong leader to put a check on Obama's agenda. That's Marco Rubio.

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14044350798

Crossroads GPS

"Problem With Patty"

1 X :30 TV

VIDEO	AUDIO
Strong Davis	Strong "We sent Patty Murray to DC . . ." Davis almost 20 years ago."
Herrington	Herrington "That's plenty for Patty Murray"
McCaughy Bergstrom	McCaughy "We trusted her to fix things." Bergstrom "Heck, Patty's become part of the problem"
Corl	Corl "The debt that Patty has supported is going to effect our children for generations."
Burk	Burk "Her bailouts have done nothing"
Admunson	Admunson "For heaven's sake, she supported Obamacare"
The Nelsons	The Nelsons "And that threatens our lives"
Davis	Davis "She's been there too long"
Bergstrom Raymond Corl	Bergstrom "We can't afford . . ." Raymond . . . six more years . . . Corl of Patty Murray."
Patty Illustration over disclaimer. CROSSROADS GRASSROOTS POLICY STRATEGIES (CROSSROADS GPS) IS RESPONSIBLE FOR THE CONTENT OF THIS ADVERTISING. PAID FOR BY CROSSROADS GRASSROOTS POLICY STRATEGIES. NOT AUTHORIZED BY ANY CANDIDATE OR CANDIDATE'S COMMITTEE. WWW.CROSSROADSGPS.ORG	Crossroads GPS is responsible for the content of this advertising.

14044350799

Crossroads GPS

TV:30"Shocker"

14044350800

Scene	VIDEO	AUDIO
1	Couple at table paying bills. Electronic zap in background.	(SFX: Electric zap noises.) Utility bills have you shocked?
2	Moving video of Conway into shot. More zaps? Family out. Utility line background in, Conway keeps talking SUPER: Increase KENTUCKY Utility Rates by \$6 million	Jack CONway is supposed to represent YOU against the utility companies, yet he's personally profiting as THEY make more.
3	Electric arcs on the power wires. Lots' of zaps. SUPER: \$263,000 in Stock Dividends to Conway PERSONALLY.	Conway made hundreds of thousands in dividends from a company linked to a utility CONway allowed to raise rates.
4	SUPER: \$70,000 to Conway from executives, lobbyists and PACS Capitol falls in behind. Conway. More electricity in the air.	And Conway's taken over \$70,000 from executives, lobbyists and PACS of utilities. (SFX: Electric zap noises.)
5	More lighting, electricity in the air. Wrong way Conway sign pops in.	And another shocking example of why... Jack Con Way is the Wrong Way ...for Kentucky
6	CROSSROADS GRASSROOTS POLICY STRATEGIES (CROSSROADS GPS) IS RESPONSIBLE FOR THE CONTENT OF THIS ADVERTISING. PAID FOR BY CROSSROADS GRASSROOTS POLICY STRATEGIES. NOT AUTHORIZED BY ANY CANDIDATE OR CANDIDATE'S COMMITTEE. WWW.CROSSROADSGPS.ORG	Crossroads GPS is responsible for the content of this advertising.

Crossroads GPS

TV:30 "Story"

Scene	VIDEO	AUDIO
1	Tired, old looking Harry. Spot roams over the Review Journal article.	Harry Reid... "champion of liberal special interests inside the beltway."
2	Pulls out the quotes as they are said. Supports with inset images.	"...disconnected from Nevada and its residents."
3		"...The Obama playbook -- to which Sen. Reid hitched his fortunes -- has failed miserably."
4		"...a vote for Harry Reid is a vote for the status quo in Washington."
5		"More of the same big spending."
6		"More of the same disdain for the job-creating private sector."
7	Harry Reid: Extremely Out Of Touch With Nevada	Nevada just can't afford more of the same old Harry Reid
8	CROSSROADS GRASSROOTS POLICY STRATEGIES (CROSSROADS GPS) IS RESPONSIBLE FOR THE CONTENT OF THIS ADVERTISING. PAID FOR BY CROSSROADS GRASSROOTS POLICY STRATEGIES. NOT AUTHORIZED BY ANY CANDIDATE OR CANDIDATE'S COMMITTEE. WWW.CROSSROADSGPS.ORG	Crossroads GPS is responsible for the content of this advertising."

14044350801

Crossroads GPS

TV 30:

Title: "Colors"

Video

VIDEO: Pic of Crist and news clip
CG: Charlie Crist
CG: "campaign chameleon, shifting shape and changing colors"
CITE: Tampa Tribune-September 1, 2010

VIDEO: Crist-Obama hug photo
CG: embraced Obama's failed economic "stimulus"

VIDEO: ATR Pledge
CG: Broke Pledge, Raised Taxes

VIDEO: Plane-postcards of Europe
London, Paris, St. Petersburg, Madrid
CG: \$400,000 taxpayer trip to Europe

VIDEO: Christ photo stick or fishing pole, images flash through hug photo,
CG: Vote No
[We Can't Afford]
Chameleon Charlie Crist

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Audio

Chameleons change color all the time

So does Charlie Crist

Charlie Crist say's he's a fiscal conservative, but embraced Obama's failed "stimulus" that put us in debt while we lost jobs.

He pledged not to raise taxes - then broke his word.

And spent our taxpayer dollars on a luxury trip to Europe.

Charlie Crist: embracing Obama, raising taxes, and wasting our money.

We don't need another chameleon in Washington.

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14044350802

Crossroads GPS
:30 TV "Consistent"

VIDEO	AUDIO
FOX BUSINESS ANCHOR	"A scandal deepens..."
SUPER: More troubling news about Alexi.	More troubling news about Alexi Giannoulias...
CHRIS MATTHEWS ON CAMERA	"...Giannoulias told voters he left his family's troubled bank back in 2005, but he told the IRS he was still working there in 2008, that enabled him to take a two point seven million dollar tax deduction..."
CUT FROM MATHEWS, HEAR HIS VOICE, SUPER: "Alexi Giannoulias seems to be telling voters one thing, and the Internal Revenue Service another" <i>-SOURCE: CBS News, Sept 29, 2010</i>	
ALEXI on Morning Joe	"I've been consistent from the very beginning..."
SUPER: "Giannoulias' explanation of bank hours changes...again" SOURCE: WLS - AM, October 7, 2010	Not true. His story keeps changing.
ALEXI at debate	
SUPER: Alexi Giannoulias: "We need an income tax increase"	The only thing he's not changed his story on... "we need an income tax increase."
SUPER: Tax scandal for Alexi. More taxes for you.	
Super: CROSSROADS GRASSROOTS POLICY STRATEGIES (CROSSROADS GPS) IS RESPONSIBLE FOR THE CONTENT OF THIS ADVERTISING. PAID FOR BY CROSSROADS GRASSROOTS POLICY STRATEGIES. NOT AUTHORIZED BY ANY CANDIDATE OR CANDIDATE'S COMMITTEE. WWW.CROSSROADSGPS.ORG	Crossroads GPS is responsible for the content of this advertising.

14044350803

Crossroads GPS

TV:30 "Enough"

14044350804

Scene	VIDEO	AUDIO
1	Start of negative ad: Dark music, dark shots of Harry Reid and Capitol. Over the top political ad feel. Graphics: 27 years.	BOB: (very ANNOUNCER-ly): Senator Harry Reid, for 27 years, he's...(SFX: Screech.)
2	Scene freezes. No supers. Just frozen. Cracks, rips open.	Wait a minute.
2	Bob North on camera	Are you tired of all these negative political ads?
3	Bob takes off headset. Pull back and pan left. Putting Bob screen right with left side of screen for supers over foam wall. Scene continues.	(tone turns much more conversational): Ok, how about just the facts?
4	SUPERS (on screen left): Harry Reid's Nevada. (Rest of supers come on as announcer says then one at a time: <ul style="list-style-type: none"> - Highest unemployment - Highest foreclosure rate - ObamaCare - More national debt - Wall Street Bailout 	Nevada has the highest unemployment in the country. The highest foreclosure rate. Instead of fixing these problems, Harry Reid's made it worse pushing ObamaCare, more national debt, the Wall Street Bailout. Pretty simple.
5	Bob puts back on headphones	With that record, that's really all you need to know.
6	SUPER: NO on Harry Reid	Crossroads GPS is responsible for the content of this advertising.
7	CROSSROADS GRASSROOTS POLICY STRATEGIES (CROSSROADS GPS) IS RESPONSIBLE FOR THE CONTENT OF THIS ADVERTISING. PAID FOR BY CROSSROADS GRASSROOTS POLICY STRATEGIES. NOT AUTHORIZED BY ANY CANDIDATE OR CANDIDATE'S COMMITTEE. WWW.CROSSROADSGPS.ORG	

Crossroads GPS

"Patty's Promises"

1 X :30 TV

VIDEO	AUDIO
Patty Murray from 1992 debate	Patty Murray from 1992 debate I will fight on the floor of the US Senate to put in place a long-term budget deficit reduction plan...
Mandy Raymond	Mandy Raymond I wouldn't let Patty balance my checkbook.
Patty from 1992	Patty from 1992 ...we can assure our future generations that there will be jobs.
Jenna Davis	Jenna Davis My brother's unemployed, my friends are losing their homes, and I'm sick of it.
Glenn Avery	Glenn Avery Patty is burying small business under an avalanche of taxes and regulation.
Katie Corl	Katie Corl I think she's been there too long.
Senior Couple	Senior Couple Let's retire Patty Murray
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14044350805

Crossroads GPS
:30 TV
"Known"

VIDEO	AUDIO
<p>Super: Meet the Press, 10/10/10 Super: Alexi Giannoulias</p>	<p>DG: "Did you know that they were crime figures that your Bank was loaning money to?"</p>
<p>Video: MTP, 25:40 <u>http://www.msnbc.msn.com/id/39580664/ns/meet-the-press-transcripts</u></p>	<p>AG: "As I've said, I, we didn't know the extent of that activity"</p>
<p>Super: Alexi's "damning non-denial about loans to criminals" Source: Chicago Tribune, 10/11/10</p>	<p>A "damning non-denial about loans to criminals."</p>
<p>"felons connected to organized crime." -- Source: Chicago Tribune, 10/11/10</p>	<p>Felons and mob figures. <i>[echo "I didn't know the extent..."]</i></p>
<p>"Giannoulias' explanation of bank hours changes...again" WLS - AM, October 7, 2010</p>	<p>Spinning different stories about his fishy tax dodge. <i>[echo "I have been consistent..."]</i></p>
<p>Super: "Parents Suffered A Total Loss Of Around \$150 Million" Source: Crain's Chicago Business, December 22, 2009</p>	<p>And squandering money Illinois families saved for college.</p>
<p>Alexi Giannoulias can't be trusted.</p>	<p>His excuses change, but the facts don't</p>
<p>Alexi Giannoulias can't be trusted.</p>	<p>Alexi Giannoulias can't be trusted.</p>
<p>SUPER: CROSSROADS GRASSROOTS POLICY STRATEGIES (CROSSROADS GPS) IS RESPONSIBLE FOR THE CONTENT OF THIS ADVERTISING. PAID FOR BY CROSSROADS GRASSROOTS POLICY STRATEGIES. NOT AUTHORIZED BY ANY CANDIDATE OR CANDIDATE'S COMMITTEE. WWW.CROSSROADSGPS.ORG</p>	<p>Crossroads GPS is responsible for the content of this advertising.</p>

14044350806

Crossroads GPS

:30 TV

"Claim"

VIDEO	AUDIO
<p>Video: Shredder and TV Super: Alexi Giannoulis Bright Start</p>	<p>VO: It's Alexi Giannoulis' claim to fame... the Bright Start college savings fund.</p>
<p>Video: Alexi's ad plays</p>	<p>AG: "We're helping parents and grandparents put money away for their kids to go to college."</p>
<p>Super: "...bad investment choices...leading to outsized losses" Source: Chicago Sun Times, 1/14/09</p>	<p>VO: But Illinois families LOST money with Giannoulis in charge...</p>
<p>Super: "Parents Suffered A Total Loss Of Around \$150 Million" Crain's Chicago Business, 12/22/09</p>	<p>Millions of dollars saved up for kids to go to college... gone...</p>
<p>Video: Child getting a diploma... then picture shredded. Super: Parents trusted Alexi... Alexi let them down.</p>	<p>Parents trusted Alexi... and Alexi let them down.</p>
<p>Super: Broken promises... financial neglect... a dishonest campaign...</p>	<p>Broken promises... financial neglect... a dishonest campaign...</p>
<p>Super: Illinois' can't afford any more Alexi. SUPER: CROSSROADS GRASSROOTS POLICY STRATEGIES (CROSSROADS GPS) IS RESPONSIBLE FOR THE CONTENT OF THIS ADVERTISING. PAID FOR BY CROSSROADS GRASSROOTS POLICY STRATEGIES. NOT AUTHORIZED BY ANY CANDIDATE OR CANDIDATE'S COMMITTEE. WWW.CROSSROADSGPS.ORG</p>	<p>Illinois' can't afford any more Alexi. Crossroads GPS is responsible for the content of this advertising.</p>

14044350807

**Crossroads GPS
:30 TV "Boondoggle"**

VIDEO	AUDIO
Super: 2,269,948 Californians unemployed	VO: California's economy is reeling...
Super: Jim Costa making it worse	And Congressman Jim Costa is making it worse.
Super: Costa supported Nancy Pelosi's failed agenda	While he should be helping us... He's supporting Nancy Pelosi and her failed agenda....
Super: Voted for billions in reckless spending	Voting for billions in new debt and reckless spending.
Super: Voted for Pelosi's \$814 'stimulus'	Including Pelosi's eight hundred billion dollar stimulus boondoggle
Super: Sweetheart deals and handouts for special interests	Filled with sweetheart deals and handouts to special interests
Super: Reckless spending... massive debt... helping Pelosi, NOT us	Reckless spending... massive debt... helping Pelosi, not us...
Super: Jim Costa... wrong for California	Jim Costa ... wrong for California
SUPER: CROSSROADS GRASSROOTS POLICY STRATEGIES (CROSSROADS GPS) IS RESPONSIBLE FOR THE CONTENT OF THIS ADVERTISING. PAID FOR BY CROSSROADS GRASSROOTS POLICY STRATEGIES. NOT AUTHORIZED BY ANY CANDIDATE OR CANDIDATE'S COMMITTEE. WWW.CROSSROADSGPS.ORG	Crossroads GPS is responsible for the content of this advertising.

14044350808

**Crossroads GPS
:30 TV "Boondoggle"**

VIDEO	AUDIO
Super: 277,604 Missourians unemployed.	VO: Missouri's economy is reeling...
Super: Russ Carnahan making it worse	And Congressman Russ Carnahan is making it worse.
Super: Carnahan supported Nancy Pelosi's failed agenda	While he should be helping us... He's supporting Nancy Pelosi and her failed agenda....
Super: Voted for billions in reckless spending	Voting for billions in new debt and reckless spending.
Super: Voted for Pelosi's \$814 'stimulus'	Including Pelosi's eight hundred billion dollar stimulus boondoggle
Super: Sweetheart deals and handouts for special interests	Filled with sweetheart deals and handouts to special interests
Super: Reckless spending... massive debt... helping Pelosi, NOT us	Reckless spending... massive debt... helping Pelosi, not us...
Super: Russ Carnahan... wrong for Missouri	Russ Carnahan ... wrong for Missouri
SUPER: CROSSROADS GRASSROOTS POLICY STRATEGIES (CROSSROADS GPS) IS RESPONSIBLE FOR THE CONTENT OF THIS ADVERTISING. PAID FOR BY CROSSROADS GRASSROOTS POLICY STRATEGIES. NOT AUTHORIZED BY ANY CANDIDATE OR CANDIDATE'S COMMITTEE. WWW.CROSSROADSGPS.ORG	Crossroads GPS is responsible for the content of this advertising.

14044350809

**Crossroads GPS
:30 TV "Boondoggle"**

VIDEO	AUDIO
Super: 315,655 Indianans unemployed	VO: Indiana's economy is reeling...
Super: Joe Donnelly making it worse	And Congressman Joe Donnelly is making it worse.
	While he should be helping us...
Super: Donnelly supported Nancy Pelosi's failed agenda	He's supporting Nancy Pelosi and her failed agenda....
Super: Voted for billions in reckless spending	Voting for billions in new debt and reckless spending.
Super: Voted for Pelosi's \$814 'stimulus'	Including Pelosi's eight hundred billion dollar stimulus boondoggle
Super: Sweetheart deals and handouts for special interests	Filled with sweetheart deals and handouts to special interests
Super: Reckless spending... massive debt... helping Pelosi, NOT us	Reckless spending... massive debt... helping Pelosi, not us...
Super: Joe Donnelly... wrong for Indiana	Joe Donnelly ... wrong for Indiana
SUPER: CROSSROADS GRASSROOTS POLICY STRATEGIES (CROSSROADS GPS) IS RESPONSIBLE FOR THE CONTENT OF THIS ADVERTISING. PAID FOR BY CROSSROADS GRASSROOTS POLICY STRATEGIES. NOT AUTHORIZED BY ANY CANDIDATE OR CANDIDATE'S COMMITTEE. WWW.CROSSROADSGPS.ORG	Crossroads GPS is responsible for the content of this advertising.

14044350810

**Crossroads GPS
:30 TV "Boondoggle"**

VIDEO	AUDIO
Super: 13,714 North Dakotans unemployed	VO: North Dakota's economy is reeling...
Super: Earl Pomeroy making it worse	And Congressman Earl Pomeroy is making it worse.
Super: Pomeroy supported Nancy Pelosi's failed agenda	While he should be helping us... He's supporting Nancy Pelosi and her failed agenda....
Super: Voted for billions in reckless spending	Voting for billions in new debt and reckless spending.
Super: Voted for Pelosi's \$814 'stimulus'	Including Pelosi's eight hundred billion dollar stimulus boondoggle
Super: Sweetheart deals and handouts for special interests	Filled with sweetheart deals and handouts to special interests
Super: Reckless spending... massive debt... helping Pelosi, NOT us	Reckless spending... massive debt... helping Pelosi, not us...
Super: Earl Pomeroy... wrong for North Dakota	Earl Pomeroy ... wrong for North Dakota
SUPER: CROSSROADS GRASSROOTS POLICY STRATEGIES (CROSSROADS GPS) IS RESPONSIBLE FOR THE CONTENT OF THIS ADVERTISING. PAID FOR BY CROSSROADS GRASSROOTS POLICY STRATEGIES. NOT AUTHORIZED BY ANY CANDIDATE OR CANDIDATE'S COMMITTEE. WWW.CROSSROADSGPS.ORG	Crossroads GPS is responsible for the content of this advertising.

14044350811

**Crossroads GPS
:30 TV "Boondoggle"**

VIDEO	AUDIO
Super: 287,861 Tennesseans unemployed	VO: Tennessee's economy is reeling...
Super: Lincoln Davis making it worse	And Congressman Lincoln Davis is making it worse.
Super: Davis supported Nancy Pelosi's failed agenda	While he should be helping us...
Super: Davis supported Nancy Pelosi's failed agenda	He's supporting Nancy Pelosi and her failed agenda....
Super: Voted for billions in reckless spending	Voting for billions in new debt and reckless spending.
Super: Voted for Pelosi's \$814 'stimulus'	Including Pelosi's eight hundred billion dollar stimulus boondoggle
Super: Sweetheart deals and handouts for special interests	Filled with sweetheart deals and handouts to special interests
Super: Reckless spending... massive debt... helping Pelosi, NOT us	Reckless spending... massive debt... helping Pelosi, not us...
Super: Lincoln Davis... wrong for Tennessee	Lincoln Davis ... wrong for Tennessee
SUPER: CROSSROADS GRASSROOTS POLICY STRATEGIES (CROSSROADS GPS) IS RESPONSIBLE FOR THE CONTENT OF THIS ADVERTISING. PAID FOR BY CROSSROADS GRASSROOTS POLICY STRATEGIES. NOT AUTHORIZED BY ANY CANDIDATE OR CANDIDATE'S COMMITTEE. WWW.CROSSROADSGPS.ORG	Crossroads GPS is responsible for the content of this advertising.

14044350812

**Crossroads GPS
:30 TV "Boondoggle"**

VIDEO	AUDIO
Super: 590,809 Ohioans unemployed	VO: Ohio's economy is reeling...
Super: John Boccleri making it worse	And Congressman John Boccleri is making it worse.
	While he should be helping us...
Super: Boccleri supported Nancy Pelosi's failed agenda	He's supporting Nancy Pelosi and her failed agenda....
Super: Voted for billions in reckless spending	Voting for billions in new debt and reckless spending.
Super: Voted for Pelosi's \$814 'stimulus'	Including Pelosi's eight hundred billion dollar stimulus boondoggle
Super: Sweetheart deals and handouts for special interests	Filled with sweetheart deals and handouts to special interests
Super: Reckless spending... massive debt... helping Pelosi, NOT us	Reckless spending... massive debt... helping Pelosi, not us...
Super: John Boccleri... wrong for Ohio	John Boccleri ... wrong for Ohio
SUPER: CROSSROADS GRASSROOTS POLICY STRATEGIES (CROSSROADS GPS) IS RESPONSIBLE FOR THE CONTENT OF THIS ADVERTISING. PAID FOR BY CROSSROADS GRASSROOTS POLICY STRATEGIES. NOT AUTHORIZED BY ANY CANDIDATE OR CANDIDATE'S COMMITTEE. <u>WWW.CROSSROADSGPS.ORG</u>	Crossroads GPS is responsible for the content of this advertising.

14044350313

**Crossroads GPS
:30 TV "Boondoggle"**

VIDEO	AUDIO
Super: 987,151 Texans unemployed	VO: Our economy is reeling...
Super: Ciro Rodriguez making it worse	And Congressman Ciro Rodriguez is making it worse.
	While he should be helping us...
Super: Rodriguez supported Nancy Pelosi's failed agenda	He's supporting Nancy Pelosi and her failed agenda....
Super: Vetted for billions in reckless spending	Voting for billions in new debt and reckless spending.
Super: Vetted for Pelosi's \$814 'stimulus'	Including Pelosi's eight hundred billion dollar stimulus boondoggle
Super: Sweetheart deals and handouts for special interests	Filled with sweetheart deals and handouts to special interests
Super: Reckless spending... massive debt... helping Pelosi, NOT us	Reckless spending... massive debt... helping Pelosi, not us...
Super: Ciro Rodriguez... wrong for Texas	Ciro Rodriguez ... wrong for Texas
SUPER: CROSSROADS GRASSROOTS POLICY STRATEGIES (CROSSROADS GPS) IS RESPONSIBLE FOR THE CONTENT OF THIS ADVERTISING. PAID FOR BY CROSSROADS GRASSROOTS POLICY STRATEGIES. NOT AUTHORIZED BY ANY CANDIDATE OR CANDIDATE'S COMMITTEE. WWW.CROSSROADSGPS.ORG	Crossroads GPS is responsible for the content of this advertising.

14044350814

**Crossroads GPS
:30 TV "Boondoggle"**

VIDEO	AUDIO
Super: 207,715 Minnesotans unemployed	VO: Minnesota's economy is reeling...
Super: Jim Oberstar making it worse	And Congressman Jim Oberstar is making it worse. While he should be helping us...
Super: Oberstar supported Nancy Pelosi's failed agenda	He's supporting Nancy Pelosi and her failed agenda....
Super: For billions in reckless spending	Voting for billions in new debt and reckless spending.
Super: Voted for Pelosi's \$814 billion 'stimulus'	Including Pelosi's eight hundred billion dollar stimulus boondoggle
Super: Sweetheart deals for special interests	Filled with sweetheart deals and handouts to special interests
Super: Reckless spending... massive debt... helping Pelosi, NOT us	Reckless spending... massive debt... helping Pelosi, not us...
Super: Jim Oberstar... wrong for Minnesota	Jim Oberstar ... wrong for Minnesota
SUPER: CROSSROADS GRASSROOTS POLICY STRATEGIES (CROSSROADS GPS) IS RESPONSIBLE FOR THE CONTENT OF THIS ADVERTISING. PAID FOR BY CROSSROADS GRASSROOTS POLICY STRATEGIES. NOT AUTHORIZED BY ANY CANDIDATE OR CANDIDATE'S COMMITTEE. WWW.CROSSROADSGPS.ORG	Crossroads GPS is responsible for the content of this advertising.

14044350815

**Crossroads GPS
:60 Radb
"Deal"**

Ann: She's baccckkkkk.

Nancy Pelosi's at it again...

Trying to raise taxes while our economy struggles...

On New Year's Day, taxes skyrocket for everyone unless Congress acts. Even low-income families will see their tax rates increase by 50 percent.

But Nancy Pelosi is blocking the bipartisan plan to stop these tax hikes.

Her reckless ploy could bring back the marriage penalty tax, and hike the death tax on family businesses, farms and savings.

And whose side is Congressman XX on? Will he (she) side with Nancy Pelosi to raise job-killing taxes, or with struggling families and small businesses that can create the jobs we need?

After two years of bailouts and wasteful spending, enough is enough.

Call Congressman XX at xxx -xxx -xxxx... Tell him (her) to stand up to Pelosi and demand a vote. It's time to cut spending, NOT raise taxes.

This moment of common sense is sponsored by Crossroads Grassroots Policy Strategies.

Representative	DC Phone
Gabriella Giffords	202-225-2542
Jim Costa	202-225-3341
Sanford Bishop	202-225-3631
Joe Donnelly	202-225-3915
Ben Chandler	202-225-4706
Gary Peters	202-225-5802
Heath Shuler	202-225-6401
Tim Bishop	202-225-3826
Maurice Hinchey	202-225-6335
Bill Owens	202-225-4511
Jason Altmire	202-225-2565
Gerry Connolly	202-225-1492

14044350816

JUST WHEN YOU THOUGHT IT WAS SAFE TO CREATE JOBS...



THE HOUSE'S REVENUE BUDGET CONTAINS A TAX ATTACK

House Budget Committee Chairman Paul Ryan's budget proposal would raise taxes on middle-class families and small businesses, while cutting social programs that help the most vulnerable.

The House's budget would raise taxes on middle-class families and small businesses, while cutting social programs that help the most vulnerable. This is a tax attack on the middle class.

When you think it's safe to create jobs, the House is already planning to raise taxes.

House Budget Committee Chairman Paul Ryan's budget proposal would raise taxes on middle-class families and small businesses, while cutting social programs that help the most vulnerable.

House Budget Committee Chairman Paul Ryan's budget proposal would raise taxes on middle-class families and small businesses, while cutting social programs that help the most vulnerable.

House Budget Committee Chairman Paul Ryan's budget proposal would raise taxes on middle-class families and small businesses, while cutting social programs that help the most vulnerable.

FIGHT FOR AMERICAN JOBS. STOP THE TAX ATTACK.
Support S. 3773, the Tax Hike Prevention Act.

Paid for by Crossroads Concrete Tilt-Up Strategies.



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