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HOW THE 2020 ELECTIONS REMAIN VULNERABLE TO SECRET ONLINE INFLUENCE

Spending on digital political ads in 2020 was expected to break new records even before the COVID-19 pandemic moved most political campaigning from in-person to online. Yet four years after the last presidential election demonstrated the risks associated with opaque digital political advertising, Americans still know very little about how groups are spending money to influence federal elections online.

For example, from February through July 2020, the super PAC Senate Leadership Fund reported to the Federal Election Commission (“FEC”) that it spent over \$450,000 on “online advertising” supporting seven Republican Senate incumbents across the country.¹ Yet in an illustration of the limits of self-regulatory efforts by big internet platforms, the ads themselves are a mystery: political ad archives maintained by Facebook, Google, Snapchat, and Reddit failed to capture a single one of these ads.

On the Democratic side, super PACs Future Progress and Democratic Progress together reported to the FEC over \$150,000 in digital advertising promoting Democratic Congressional candidates in Iowa and Indiana. None of those ads can be accounted for in the Facebook, Google, Snap, or Reddit archives either.

These are not isolated examples. So far this cycle, digital ads from more than a dozen other groups that have reported tens or hundreds of thousands of dollars in digital ad spending to the FEC are largely or entirely untraceable. **This report shows that, despite self-imposed transparency measures from some of the big platforms, the public is still left in the dark about the content of many targeted political ads running online.**

Following Russia’s use of social media to secretly meddle in the 2016 elections, and in the face of pressure from Congress and the public, large online platforms like Facebook and Google began voluntarily instituting new transparency measures for political ads.² These companies now maintain public political ad repositories, which include copies of the ads run on their platforms, together with information about whom the ads targeted, the amounts spent, and the groups that funded the ads.

These voluntary measures are a step in the right direction, but a growing body of evidence shows why platform-by-platform efforts are ultimately insufficient: as this report documents, many digital political ads are apparently not running on those big platforms at all.

Instead, it appears that a significant portion of digital political ads are running on streaming services or other platforms that have not created public ad repositories.³ This is the most likely explanation for the discrepancy between the amount that political advertisers are reporting to the FEC and the amount appearing in the Facebook or other ad archives.

As *Protocol's* Issie Lapowsky explained in April, the Facebook and Google archives “are voluntary on the part of the companies, their requirements vary, and they reveal nothing about the ads appearing off their platforms.”⁴ With the current system relying on voluntary platform-by-platform measures rather than across-the-board standards and rules, a significant amount of paid digital political activity is remaining effectively in the dark.

As a result, our elections still remain vulnerable to secret and difficult-to-detect online influence campaigns—from both foreign and domestic sources.

One early illustration of this problem was the secretly funded nonprofit “dark money” group Big Tent Project Fund, which reported to the FEC that it spent \$4.4 million on digital ads in the Democratic presidential primary, yet a mere 4% of that spending could be accounted for via the public digital ad archives.⁵ The new examples in this report suggest that the Big Tent Project Fund was a bellwether of a building 2020 trend.

What’s more, these illustrative examples only provide a glimpse into even broader transparency problems around targeted digital political ads.

Under current law, dark money groups—nonprofits that spend money in federal elections but generally keep their donors secret—only report digital spending to the FEC when the ads expressly advocate for the election or defeat of federal candidates with words like “vote for” or “vote against.” When dark money groups pay for digital ads that praise or attack candidates, but stop short of express advocacy, they need not report the spending to the FEC at all, nor are they legally required to include “paid for by” disclaimers on their ads. Through tools like the Facebook archive, CLC has identified several examples of dark money groups running such ads, yet we cannot know how much has been spent on similar ads on platforms that have not voluntarily adopted transparency measures.

In the 2020 elections and beyond, the transparency loopholes exploited by the groups in this report will almost certainly be used by other political operatives—foreign or domestic—to attack or promote candidates across the political spectrum, leaving the public in the dark about the content of targeted political ads and making it harder to correct misleading information.

The examples in this report—which are by no means a comprehensive or exhaustive list—provide further evidence of the need for Congress to adopt across-the-board digital disclosure legislation.

Evidence Shows that Voluntary, Platform-by-Platform Archiving is Insufficient

CLC identified over a dozen super PACs or dark money groups in the 2020 cycle that reported tens or hundreds of thousands of dollars in digital “independent expenditures” to the FEC, but for which none or only a fraction of the FEC-reported ads could be identified in the Facebook or Google archives. None of these groups ran ads that appeared in the Snap or Reddit archives.⁶ Many of the ads promoted or attacked Senate or House primary candidates.

The FEC requires fairly minimal detail on independent expenditure reports: it is generally sufficient to report spending on “online/digital advertising,” without disclosing on which platforms the ads actually ran.⁷

However, FEC-reported independent expenditures should show up in the Facebook, Google, Snap, or Reddit archives if run on those platforms. By definition, “independent expenditures” are ads that expressly advocate for or against a candidate’s election,⁸ and, therefore, all FEC-reported ads would meet every platform’s definition of “political advertising.”⁹

Between February and July of 2020, Senate Leadership Fund reported spending over \$450,000 on “online advertising” supporting the seven Republican Senate incumbents Mitch McConnell (R-KY), Joni Ernst (R-IA), Susan Collins (R-ME), Martha McSally (R-AZ), Steve Daines (R-MT), Thom Tillis (R-NC), and Cory Gardner (R-CO).¹⁰ Yet as of mid-August, neither the Facebook archive, which includes both Facebook and Instagram ads, nor the Google archive, which includes ads from both Google’s “Adwords” network and YouTube, shows any record of Senate Leadership Fund ads mentioning those candidates. No ads from Senate Leadership Fund appeared in Snap’s archive of political ads that run on Snapchat, or Reddit’s archive of ads run on Reddit.

It was a similar situation with the super PACs Future Progress and Democratic Progress, which together reported to the FEC over \$150,000 in digital independent expenditures promoting Democratic House candidates in Iowa and Indiana, but without any corresponding ads appearing in public archives. Other super PACs, such as Hoosier Heartland Fund, House Freedom Fund, and America’s Constitution PAC, also reported digital independent expenditures promoting Republican House and Senate candidates with no apparent record of those ads in the platform-maintained archives.

As the attached table shows, at least seven other dark money groups or super PACs together told the FEC that they’d spent hundreds of thousands of dollars on digital independent expenditures, but only a fraction of each group’s spending could be accounted for in the Facebook or Google archives. (No ads from these groups appeared in the Snap or Reddit archives.)

For example, the Facebook archive shows that the Democratic Majority for Israel (“DMFI”) PAC spent between \$11,500 and \$13,896 on Facebook and Instagram ads opposing Valerie Plame, a candidate in the Democratic primary for New Mexico’s 3rd

Congressional seat.

But that is only a sliver of the nearly \$97,000 that DMFI PAC told the FEC it spent on digital anti-Plame ads. No such ads from the group can be found in the Google or Snap archives, meaning between 86% and 88% of the PAC's spending is unaccounted for.

Where did the rest of the money go?

The absence of comprehensive, legally required digital political ad disclosure means that we do not know for certain, but the most likely explanation is that many of these FEC-reported ads are appearing on less-transparent digital platforms, such as streaming services. (Ad production costs and commissions are often embedded in total reported independent expenditures, but those input expenses would constitute a relatively small percentage of overall spending—nowhere near 80% or 100%, unless the advertisers were running a scam.¹¹)

Although Facebook and Google are estimated to account for over 75% of digital political ad revenue,¹² many other platforms host political ads, so advertisers seeking to avoid transparency have multiple options. For example, political ads have been flooding Hulu and other streaming services in the 2020 election cycle, but there are no legal requirements that the ads themselves be made publicly available, and streaming platforms have not adopted voluntary transparency measures like Facebook's.¹³

A Google Problem

Google's archive in particular makes it a challenge to monitor political ads and calculate the discrepancy between FEC-reported digital spending and the amount that appears in digital archives.

For one, the Google archive makes some ads almost completely unavailable. The super PAC With Honor Fund, for example, told the FEC that it spent over \$31,000 on digital independent expenditures supporting a Democratic Congressional in Indiana. The Google archive shows the PAC spent between \$602 and \$6,200 on ads in the 2020 cycle, but none of the ads are available, either because they were purchased using a third-party vendor or because they violated Google's policies. Google's archive does not clearly explain why the ads are unavailable, nor does it give users an option to unlock and view the ads. Nor does it even mention which candidates or issues the now-hidden ads pertained to.

Additionally, the Google archive provides only very broad dollar amount ranges for spending on particular ads, limiting the archive's utility and making calculations difficult. For example, Perise Practical told the FEC that it spent \$50,000 on digital ads in support of New Mexico candidate Teresa Leger Fernandez, and Google's archive showed a single Google ad valued between \$1,000 and \$50,000. That could mean that the group's single Google ad accounted for as little as 2% or as much as 100% of the group's FEC-reported digital spending. Perise Practical also reported spending \$180,000 on digital ads in support of Representative Elliot Engel (D-NY-16), and the group's two pro-Engel ads in the Google archive were similarly valued between \$1,000 and \$50,000 each; the Google ads could account for anywhere between 1% and 56% of the group's reported digital spending on the race.

Finally, Google's archive only updates once per week, making it a challenge to monitor political advertising in the midst of a fast-moving election cycle.

Streaming services, like other digital platforms, offer substantial targeting abilities, so an ad microtargeted on a platform like Hulu, Roku, or Tubi is only seen by the viewers to whom it is targeted, and not to the public as a whole. That lack of transparency makes it a challenge to address misinformation, and difficult for candidates who are

the subject of the ads to respond. It also makes it harder for watchdogs, journalists, and law enforcement to track spending and detect potential campaign finance violations.

These transparency problems are unique to the digital space. Broadcast ads are widely distributed and the ads are generally available to the press and public; digital ads are highly targeted and (unless run on a platform that has voluntarily created a public archive) difficult for anybody other than the targeted recipient to obtain. Additionally, federal law *requires* that broadcast stations collect and maintain records from political advertisers.¹⁴ By contrast, campaign finance law's digital blind spot means that for political ads run on digital platforms, there is no equivalent legal requirement for public recordkeeping.

This has created a significant and growing gap in federal campaign finance law that Congress has failed to close, even as paid political activity online surges. Platforms like Facebook and Google have narrowed that gap slightly with their own voluntary archives, but they are insufficient substitutes for across-the-board legislation.

Other Transparency Gaps Also Keep the Public in the Dark

Some of those ads that do appear in the platform-maintained archives highlight other gaps in campaign finance law.

For years, thanks in large part to obstruction by companies like Facebook, the FEC has exempted digital political ads from the disclaimer requirements that apply to ads run on any other medium, even as political ad activity moves increasingly online.¹⁵ Meanwhile, Congress has failed to update campaign finance law for the digital age, omitting many online ads from the reporting requirements that apply to political spending on other mediums.

For example, the Facebook page “A Better Arizona” was created in March 2020, and in just a few months, spent over \$637,000 on ads attacking Senator Martha McSally (R-AZ), according to Facebook's own ad spending estimates.¹⁶



A Better Arizona
Sponsored • Paid for by Priorities USA and Majority Forward

Frontline workers kept our communities safe. Meanwhile, Martha McSally voted against paid sick leave for us.



ABETTERARIZONA.COM
Call Martha McSally
Tell her to pass paid sick leave now.

[Learn ...](#)



A Better Arizona
Sponsored • Paid for by Priorities USA and Majority Forward

Martha McSally voted to take away coverage from people with pre-existing conditions putting millions of Arizonans at risk.




ABETTERARIZONA.COM
Call Martha McSally
Tell her to protect pre-existing conditions.

[Learn ...](#)


The ads critiqued McSally's legislative record but stopped short of expressly urging viewers to "vote against" the candidate, who is up for reelection in November.¹⁷

None of the spending on those ads was reported to the FEC.¹⁸

Similarly, a Facebook page "A Stronger Maine" was created in April 2020, and, according to Facebook's estimates, soon spent over \$210,000 on ads attacking Senator Susan Collins (R-ME), who is also facing a close reelection contest.¹⁹

**A Stronger Maine**
Sponsored • Paid for by Priorities USA and Majority Forward

Why did Susan Collins write a bill that's given nothing to most Maine small businesses while giving taxpayer money to the L.A. Lakers, major hotel chains, and Ruth's Chris Steak House?



ASTRONGERMAINE.COM
Call Susan Collins
Tell her now is the time to protect small businesses.

[Learn ...](#)**A Stronger Maine**
Sponsored • Paid for by Priorities USA and Majority Forward

None of that spending was reported to the FEC, either.²⁰

Because Facebook is now requiring political advertisers to include "paid for by" disclaimers, we know that both pages' ads were funded by two Democratic dark money groups: Priorities USA (the non-profit arm of the super PAC Priorities USA Action) and Majority Forward,²¹ which was the top-spending dark money group in the 2018 election cycle.²²

The reason that these ads were never reported to the FEC is that they don't expressly tell viewers to vote against Senators McSally and Collins. Under current law, political nonprofits like Majority Forward and Priorities USA need only report their spending on digital "independent expenditures" that expressly advocate for or against the election of candidates.²³ Spending on digital ads like these that praise or attack candidates, but stop short of express advocacy, need not be reported.

Because these ads do not include express advocacy, "paid for by" disclaimers are not legally required either: we only know who paid for these ads because Facebook has voluntarily adopted a disclaimer requirement.²⁴

If these ads had been run on TV, however, some would have been subject to legal disclaimer and reporting requirements.

Under current law, “electioneering communications” are defined as broadcast — but not digital — ads run 30 days before a primary election or 60 days before the general election that name a candidate, and are targeted to that candidate’s voters, even if they don’t expressly tell viewers to vote for or against a candidate.²⁵ Spending on electioneering communications must be reported to the FEC, and the ads are legally required to include disclaimers.²⁶

Between \$171,000 and \$218,000 of the anti-McSally ads from “A Better Arizona” ran in the 30 days before the Arizona primary, and therefore fell within the electioneering communication period. Between \$124,000 and \$155,000 of the anti-Collins ads from “A Stronger Maine” also ran in Maine’s electioneering communication period.

As a result, these ads would have been legally required to include “paid for by” disclaimers if broadcast on TV or radio, and Priorities USA and Majority Forward would have had to report their spending on them to the FEC.

But because these ads were run online, they could remain shrouded in secrecy without breaking any laws. Similar ads from these groups that ran on platforms other than Facebook or Google may not have even informed viewers who paid for them.

These were not isolated examples.

The dark money group “Iowa Values”—which has close ties to Senator Joni Ernst (R-IA) and her campaign²⁷—spent between \$11,000 and \$14,000 on pro-Ernst Facebook ads during Iowa’s electioneering communications window, according to Facebook’s archive.²⁸ If the ads were run on TV, they would have been reported to the FEC; because they were run online, they were not reported at all. We don’t know how much Iowa Values may have spent on similar digital ads run on other platforms that have not created archives.

Additionally, both Priorities USA and Majority Forward are also running political ads under the names of other pop-up Facebook pages—which we only know about because Facebook required that the ads include disclaimers. For example:

- Between June 2019 and March 2020, Priorities USA spent nearly \$4.8 million on anti-Trump ads from the Facebook page “Let’s Be Honest,” according to the Facebook archive; none of the ads expressly advocated against Trump’s election, and therefore were never reported to the FEC.²⁹
- Between June 2019 and April 2020, Priorities USA also spent over \$514,000 on anti-Trump ads in Spanish and English from the page “Hablemos Claro USA,” and similarly never reported the spending to the FEC.³⁰
- Majority Forward has also spent over \$193,000 on ads attacking Sen. Steve Daines (R-MT) from the Facebook page “Our Big Sky Country.”³¹

Absent Facebook’s self-imposed disclaimer requirement, voters might have no idea who was really behind these innocuous-sounding Facebook pages. (These ads were largely run outside of existing electioneering communication windows so would not

have been reported to the FEC even if run on TV.)

In fact, before Facebook began requiring disclaimers in 2018, Majority Forward had run ads under the names of similar pop-up Facebook pages without including disclaimers telling viewers that a major Democratic dark money group had paid for them.³²

The Trump campaign, for its part, has also regularly run ads from Facebook pages other than its own. Authorized Trump campaign committees have paid for ads run under the names of at least eight Facebook pages other than the official “Donald J. Trump” page, including pages with names like “Black Voices for Trump” and “Latinos for Trump.”³³ The National Republican Senatorial Committee (“NRSC”) has also spent over \$118,000 on ads attacking the Democratic candidate in Arizona’s Senate race, Mark Kelly, from the Facebook page “Big Money Mark Kelly.”³⁴

All communications from campaign and party committees are legally required to include disclaimers—and, indeed, examples like these underscore the important informational value of such disclaimers—but the FEC still has not finalized regulations making clear that disclaimers are required on the face of *all* digital political ads.

Conclusion and Solutions

Fortunately, there are solutions to these growing problems.

Legislation like H.R. 1, the “For the People Act,”³⁵ which incorporates the Honest Ads Act³⁶—first introduced in 2017 with bipartisan support— would formally subject online ads to the same disclaimer and disclosure requirements that currently apply to ads run on any other medium.

Proposed legislation like this would update campaign finance law for the digital age by extending the “electioneering communication” definition to include digital ads and clarifying disclaimer requirements, so that ads like those run by Priorities USA and Majority Forward would formally be subject to the same transparency rules as ads run on any other medium.

Such legislation would also mandate the creation of publicly available digital political ad archives. As drafted, the Honest Ads Act would require larger platforms with over 50 million unique monthly users to create archives of political ads that run on their platforms. If the Honest Ads Act were enacted, some large platforms that do not currently maintain archives, like Hulu—which claims over 54 million unique users³⁷— would be required to create their own ad repositories, which should help *partially* close the gap between FEC-reported digital ad spending and the availability of those ads in public archives.

Yet, as the first section of this report demonstrates, when only larger platforms maintain archives, political advertisers can sidestep transparency by routing ad spending to smaller platforms that are not required to make ads publicly available. If enacted in its current form, the Honest Ads Act would still not require transparency for all FEC-reported digital ads run by groups like Senate Leadership Fund or Future

Progress. Nor would it solve many of the current problems stemming from inconsistent, platform-by-platform approaches to the archives themselves, where the absence of a single, centralized repository limits usefulness to researchers and watchdogs.

These problems could be addressed by housing the archive within a government agency—likely the FEC—and by requiring that political ad purchasers provide the information directly to that agency. States like New York have already adopted legislation that places the obligation to maintain political ad archives on a state election agency, rather than on platforms like Facebook.

If such legislation were enacted, voters could visit the FEC website and see all of the FEC-reported digital ads disseminated by a super PAC like Senate Leadership Fund, rather than only that subset of ads run on big platforms that created public archives.

Such a model would make it harder to sidestep transparency, easier for journalists to track spending and monitor political messages, and easier for watchdogs and law enforcement to detect violations of campaign finance law. And platforms wouldn't be entirely off the hook: they could be required to prevent evasion by collecting a copy of the information that ad purchasers must provide to the FEC, and to make that information available to the FEC upon request.

The FEC should also require political advertisers to report more detail about their independent expenditures, such as information about the digital platforms or ad-buying networks that are distributing the communications. And the agency should proceed with its long-overdue rulemaking to clarify disclaimer requirements for digital ads.

Finally, platforms like Hulu that host significant and growing volumes of political ads should create their own versions of political ad archives. And Facebook, Google, and other large platforms should strengthen the functionality of their archives. Google's archive routinely fails to include ads purchased through third-party vendors, and provides such broad ad spending ranges that monitoring compliance becomes very difficult; additionally, Google's archive only updates once per week, which limits its utility at the height of a fast-moving campaign cycle. Facebook's archive has begun offering more precise ad spending ranges, and has added additional search functions, but still does not allow useful options for sorting ads, and offers no options for aggregating spending on a subset of ads.

Congress and the FEC have had years to address these transparency gaps, but it is now too late to enact these solutions before voters go to the polls in November 2020. Fixing the problems with dark digital advertising should be a top priority in 2021.

- ¹ Senate Leadership Fund, Independent Expenditures to Targeted Victory (24- and 48-hour reports), Jan. 1, 2020 – July 31, 2020, FEC.GOV, https://www.fec.gov/data/independent-expenditures/?data_type=processed&committee_id=C00571703&is_notice=true&most_recent=true&candidate_office=S&candidate_office_state=AZ&candidate_office_state=CO&candidate_office_state=IA&candidate_office_state=KY&candidate_office_state=ME&candidate_office_state=MT&candidate_office_state=NC&payee_name=targeted+vicinity&min_date=01%2F01%2F2020&max_date=07%2F31%2F2020 (last visited Aug. 10, 2020).
- ² BRIDGET BARRETT, DANIEL KREISS, ASHLEY FOX & TORI EKSTRAND, ADVERTISING ON PLATFORMS IN THE UNITED STATES: A BRIEF PRIMER (2020), https://citapdigitalpolitics.com/wp-content/uploads/2020/01/PlatformAdvertisingPrimer_CITAP.pdf. Twitter initially created an archive of political ads, but later announced a policy that it would no longer accept political ads on its platform. *Id.* at 2, 4.
- ³ See, e.g., Tony Romm, *Political ads are flooding Hulu, Roku and other streaming services, revealing loopholes in federal election laws*, WASH. POST (Feb. 20, 2020), <https://www.washingtonpost.com/technology/2020/02/20/hulu-roku-political-ads-streaming/>; Fredreka Schouten, Political advertising grows on streaming services, along with questions about disclosure, CNN (June 3, 2020), <https://www.cnn.com/2020/06/03/politics/streaming-services-political-ads/index.html>.
- ⁴ Issie Lapowsky, *Big tech's ad rules leave plenty of room for dark money to hide*, PROTOCOL (Apr. 8, 2020), <https://www.protocol.com/dark-money-facebook-political-ads>.
- ⁵ BRENDAN FISCHER & MAGGIE CHRIST, CAMPAIGN LEGAL CTR., DIGITAL TRANSPARENCY LOOPHOLES IN THE 2020 ELECTIONS (Apr. 2020), <https://campaignlegal.org/document/report-digital-transparency-loopholes-2020-elections>.
- ⁶ Snap Political Ads Library, SNAP, INC., <https://www.snap.com/en-US/political-ads/> (last visited Aug. 12, 2020); Reddit Political Ads Transparency Committee, REDDIT, <https://www.reddit.com/r/RedditPoliticalAds/> (last visited Aug. 12, 2020).
- ⁷ See Purposes of Disbursement, FEC.GOV (Aug. 21, 2018), <https://www.fec.gov/help-candidates-and-committees/purposes-disbursements/>.
- ⁸ 52 U.S.C. § 30101(17); 11 C.F.R. § 100.16.
- ⁹ BARRETT, KREISS, FOX & EKSTRAND, *supra* note 2; see also *Comparison of Platforms' Political Advertising Policies*, CTR. FOR INFORMATION, TECHNOLOGY, & PUBLIC LIFE AT UNIVERSITY OF NORTH CAROLINA CHAPEL HILL (Jan. 30, 2020), https://citapdigitalpolitics.com/wp-content/uploads/2020/02/Platform-Tables_AdPolicies_Feb12020.pdf.
- ¹⁰ Senate Leadership Fund, Independent Expenditures to Targeted Victory, *supra* note 1.
- ¹¹ See, e.g., Lapowsky, *supra* note 4 (“While it’s possible that smaller spending discrepancies can be explained” by ad production costs or commissions, “experts say that wouldn’t explain a multi-million dollar difference, like the one the researchers found in Big Tent Project’s reports. ‘It’s pretty unlikely. That would be an all-time rip off job,’ said Jason Rosenbaum, vice president of the public affairs firm SKDKnickerbocker’s digital arm. Rosenbaum was Hillary Clinton’s director of digital advertising in 2016, and led Google’s election and advocacy work before that.”).
- ¹² *Facebook Dominates 2019/2020 Political Ad Spending*, EMARKETER (Feb. 42, 2020), <https://www.emarketer.com/content/facebook-dominates-2019-2020-political-ad-spending>.
- ¹³ Romm, *supra* note 3.
- ¹⁴ 47 U.S.C. § 315(e); 47 C.F.R. § 73.1943.
- ¹⁵ See, e.g., FEC Advisory Opinion Request 2011-09 (Facebook); see also Sarah Frier & Bill Allison, *Facebook Fought Rules That Could Have Exposed Fake Russian Ads*, BLOOMBERG (Oct. 4, 2017), <https://www.bloomberg.com/news/articles/2017-10-04/facebook-fought-for-years-to-avoid-political-ad-disclosure-rules>.
- ¹⁶ Ads by “A Better Arizona,” Facebook Ad Library, FACEBOOK, https://www.facebook.com/ads/library/?active_status=all&ad_type=all&country=US&impression_search_field=has_impressions_lifetime&view_all_page_id=105783027731211 (last visited Aug. 10, 2020).
- ¹⁷ *Id.*
- ¹⁸ Search for “A Better Arizona,” FEC.GOV, <https://www.fec.gov/search/?type=candidates&type=committees&type=site&query=A+Better+Arizona> (last visited Aug. 10, 2020).
- ¹⁹ Ads by “A Stronger Maine,” Facebook Ad Library, FACEBOOK, https://www.facebook.com/ads/library/?active_status=all&ad_type=all&country=US&impression_search_field=has_impressions_lifetime&view_all_page_id=100987421606135 (last visited Aug. 10, 2020).
- ²⁰ Search for “A Stronger Maine,” FEC.GOV, <https://www.fec.gov/search/?type=candidates&type=committees&type=site&query=a+stronger+maine> (last visited Aug. 10, 2020).
- ²¹ See Ads by “A Better Arizona,” *supra* note 16; Ads by “A Stronger Maine,” *supra* note 19.
- ²² Michael Beckel, *In 2018 Midterms, Liberal Dark Money Groups Outspent Conservative Ones for First Time Since Citizens United*, ISSUE ONE (Dec. 2018), <https://www.issueone.org/wp-content/uploads/2019/01/Post-CU-Dark-Money-Mini-Report.pdf>.
- ²³ 52 U.S.C. § 30101(17); 11 C.F.R. § 100.16.

²⁴ Disclaimers are only required for “public communications” that expressly advocate the election or defeat of a clearly identified federal candidate. 52 U.S.C. § 30120(a); 11 C.F.R. § 110.11(a)(2); see *also* 11 C.F.R. § 100.22 (defining “expressly advocating”). The term “public communication” includes “communications placed for a fee on another person’s Web site.” 11 C.F.R. § 100.26.

²⁵ 52 U.S.C. § 30104(f)(3); 11 C.F.R. § 100.29.

²⁶ 52 U.S.C. § 30104(f)(1-2); 11 C.F.R. § 104.20 (reporting requirements for electioneering communications); 52 U.S.C. § 30120(a); 11 C.F.R. § 110.11(a)(4) (disclaimers required on electioneering communications).

²⁷ Brian Slodysko, *‘Dark money’ ties raise questions for GOP Sen. Ernst of Iowa*, ASSOCIATED PRESS (Dec. 6, 2019), <https://apnews.com/eeb44fc06b0cb202bcd1edbd1adee7f7d>.

²⁸ Ads by “Iowa Values,” Facebook Ad Library, FACEBOOK, [https://www.facebook.com/ads/library/?active_status=all&ad_type=political_and_issue_ads&country=US&impression_search_field=has_impressions_lifetime&view_all_page_id=785144711668660&sort_data\[direction\]=desc&sort_data\[mode\]=relevancy_monthly_grouped](https://www.facebook.com/ads/library/?active_status=all&ad_type=political_and_issue_ads&country=US&impression_search_field=has_impressions_lifetime&view_all_page_id=785144711668660&sort_data[direction]=desc&sort_data[mode]=relevancy_monthly_grouped) (last visited Aug. 10, 2020).

²⁹ Ads by “Let’s Be Honest,” Facebook Ad Library, FACEBOOK, https://www.facebook.com/ads/library/?active_status=all&ad_type=all&country=US&impression_search_field=has_impressions_lifetime&view_all_page_id=425408274980132 (last visited Aug. 10, 2020).

³⁰ Ads by “Hablemos Claro USA,” Facebook Ad Library, FACEBOOK, https://www.facebook.com/ads/library/?active_status=all&ad_type=all&country=US&impression_search_field=has_impressions_lifetime&view_all_page_id=102711087850827&sort_data%5bdirection%5d=desc&sort_data%5bmode%5d=relevancy_monthly_grouped (last visited Aug. 10, 2020).

³¹ Ads by “Our Big Sky Country,” Facebook Ad Library, FACEBOOK, https://www.facebook.com/ads/library/?active_status=all&ad_type=all&country=US&impression_search_field=has_impressions_lifetime&view_all_page_id=101910618215076 (last visited Aug. 10, 2020).

³² BRENDAN FISCHER & MAGGIE CHRIST, CAMPAIGN LEGAL CTR., DIGITAL DECEPTION: HOW A MAJOR DEMOCRATIC DARK MONEY GROUP EXPLOITED DIGITAL AD LOOPHOLES IN THE 2018 ELECTION (Mar. 2019), <https://campaignlegal.org/sites/default/files/2019-03/FINAL%20Majority%20Forward%20Issue%20Brief.pdf>.

³³ Ads by “Black Voices for Trump,” Facebook Ad Library, FACEBOOK, https://www.facebook.com/ads/library/?active_status=all&ad_type=political_and_issue_ads&country=US&impression_search_field=has_impressions_lifetime&view_all_page_id=607626319739286&sort_data%5bdirection%5d=desc&sort_data%5bmode%5d=relevancy_monthly_grouped (last visited Aug. 10, 2020); Ads by “Latinos for Trump,” Facebook Ad Library, FACEBOOK, [https://www.facebook.com/ads/library/?active_status=all&ad_type=political_and_issue_ads&country=US&impression_search_field=has_impressions_lifetime&view_all_page_id=612701059241880&sort_data\[direction\]=desc&sort_data\[mode\]=relevancy_monthly_grouped](https://www.facebook.com/ads/library/?active_status=all&ad_type=political_and_issue_ads&country=US&impression_search_field=has_impressions_lifetime&view_all_page_id=612701059241880&sort_data[direction]=desc&sort_data[mode]=relevancy_monthly_grouped)

(last visited Aug. 10, 2020); Ads by “Women for Trump,” Facebook Ad Library, FACEBOOK, [https://www.facebook.com/ads/library/?active_status=all&ad_type=political_and_issue_ads&country=US&impression_search_field=has_impressions_lifetime&view_all_page_id=706716899745696&sort_data\[direction\]=desc&sort_data\[mode\]=relevancy_monthly_grouped](https://www.facebook.com/ads/library/?active_status=all&ad_type=political_and_issue_ads&country=US&impression_search_field=has_impressions_lifetime&view_all_page_id=706716899745696&sort_data[direction]=desc&sort_data[mode]=relevancy_monthly_grouped)

(last visited Aug. 10, 2020); Ads by “Mike Pence,” Facebook Ad Library, FACEBOOK, [https://www.facebook.com/ads/library/?active_status=all&ad_type=political_and_issue_ads&country=US&impression_search_field=has_impressions_lifetime&view_all_page_id=6726182861&sort_data\[direction\]=desc&sort_data\[mode\]=relevancy_monthly_grouped](https://www.facebook.com/ads/library/?active_status=all&ad_type=political_and_issue_ads&country=US&impression_search_field=has_impressions_lifetime&view_all_page_id=6726182861&sort_data[direction]=desc&sort_data[mode]=relevancy_monthly_grouped)

(last visited Aug. 10, 2020); Ads by “Brad Parscale,” Facebook Ad Library, FACEBOOK, [https://www.facebook.com/ads/library/?active_status=all&ad_type=political_and_issue_ads&country=US&impression_search_field=has_impressions_lifetime&view_all_page_id=1745691098822972&sort_data\[direction\]=desc&sort_data\[mode\]=relevancy_monthly_grouped](https://www.facebook.com/ads/library/?active_status=all&ad_type=political_and_issue_ads&country=US&impression_search_field=has_impressions_lifetime&view_all_page_id=1745691098822972&sort_data[direction]=desc&sort_data[mode]=relevancy_monthly_grouped)

(last visited Aug. 10, 2020); Ads by “Evangelicals for Trump,” Facebook Ad Library, FACEBOOK, https://www.facebook.com/ads/library/?active_status=all&ad_type=political_and_issue_ads&country=US&impression_search_field=has_impressions_lifetime&view_all_page_id=100560711450721&sort_data%5bdirection%5d=desc&sort_data%5bmode%5d=relevancy_monthly_grouped

(last visited Aug. 10, 2020); Ads by “Katrina Pierson,” Facebook Ad Library, FACEBOOK, [https://www.facebook.com/ads/library/?active_status=all&ad_type=political_and_issue_ads&country=US&impression_search_field=has_impressions_lifetime&view_all_page_id=147542771956309&sort_data\[direction\]=desc&sort_data\[mode\]=relevancy_monthly_grouped](https://www.facebook.com/ads/library/?active_status=all&ad_type=political_and_issue_ads&country=US&impression_search_field=has_impressions_lifetime&view_all_page_id=147542771956309&sort_data[direction]=desc&sort_data[mode]=relevancy_monthly_grouped)

(last visited Aug. 10, 2020); Ads by “Veterans for Trump,” Facebook Ad Library, FACEBOOK, https://www.facebook.com/ads/library/?active_status=all&ad_type=political_and_issue_ads&country=US&impression_search_field=has_impressions_lifetime&view_all_page_id=105370081104608&sort_data%5bdirection%5d=desc&sort_data%5bmode%5d=relevancy_monthly_grouped (last visited Aug. 10, 2020).

³⁴ Ads by “Big Money Mark Kelly,” Facebook Ad Library, FACEBOOK, https://www.facebook.com/ads/library/?active_status=all&ad_type=political_and_issue_ads&country=US&impression_search_field=has_impressions_lifetime&view_all_page_id=107038924352529 (last visited Aug. 10, 2020).

³⁵ For the People Act of 2019, H.R. 1, 116th Cong. §§ 4201-4209 (2019).

³⁶ Honest Ads Act, S. 1356, 116th Cong. (2019).

³⁷ See, e.g., Anthony Ha, *Hulu Reached More Than 17M Subscribers and \$1B in Ad Revenue Last Year*, TECHCRUNCH (Jan. 9, 2018), <https://techcrunch.com/2018/01/09/hulu-17m-subscribers/>.

Super PAC or Nonprofit	Election(s)	Amount reported to FEC	Amount reflected in available archives	% unaccounted for
Senate Leadership Fund (R) ¹	IA-Senate, KY-Senate, AZ-Senate, MT-Senate, NC-Senate, CO-Senate, ME-Senate	\$451,899	\$0	100%
Future Progress (D) ²	IA-Senate	\$82,000	\$0	100%
Democratic Progress (D) ³	IN-01	\$75,000	\$0	100%
Hoosier Heartland Fund (D) ⁴	IN-05	\$40,000	\$0	100%
With Honor Fund (D) ⁵	IN-01	\$31,443	\$0	100%
House Freedom Fund (R) ⁶	PA-10	\$6,542	\$0	100%
House Freedom Fund (R) ⁷	MT-Senate	\$6,542	\$0	100%
America's Constitution PAC (R) ⁸	IA-04	\$3,000	\$0	100%
LV Strong (R) ⁹	PA-07	\$12,700	\$901 - \$1,197	91% - 93%
LV Strong (R) ¹⁰	NJ-05	\$7,500	\$416 - \$2,281	70% - 94%
DMFI PAC (D) ¹¹	NM-03	\$96,819	\$11,500 - \$13,896	86% - 88%
CHC Bold PAC (D) ¹²	NM-03	\$87,558	\$10,859 - \$21,507	75% - 88%
SEAL PAC (R) ¹³	PA-10	\$15,000	\$2,000 - \$2,500	83% - 87%
Protect Freedom PAC (R) ¹⁴	MT-Senate	\$50,000	\$7,600 - \$9,199	82% - 85%
Perise Practical (D) ¹⁵	NM-03	\$50,000	\$13,500 - \$64,000	0% - 73%
Perise Practical (D) ¹⁶	NY-16	\$180,000	\$20,500 - \$124,500	31% - 89%

¹ Included in this sum are the digital independent expenditures for "online advertising" that Senate Leadership Fund reported to the FEC between February and July 2020 in support of the following seven Republican Senate incumbents: Mitch McConnell (R-KY), Joni Ernst (R-IA), Susan Collins (R-ME), Martha McSally (R-AZ), Steve Daines (R-MT), Thom Tillis (R-NC), and Cory Gardner (R-CO). Senate Leadership Fund, Independent expenditures (24- and 48- hour reports) to Targeted Victory LLC in Arizona, Colorado, Iowa, Kentucky, Maine, Montana, or North Carolina, Jan. 1, 2020 – July 31, 2020, FEC.gov, https://www.fec.gov/data/independent-expenditures/?data_type=processed&committee_id=C00571703&is_notice=true&most_recent=true&candidate_office=S&candidate_office_state=AZ&candidate_office_state=CO&candidate_office_state=IA&candidate_office_state=KY&candidate_office_state=ME&candidate_office_state=MT&candidate_office_state=NC&payee_name=targeted+victory&min_date=01%2F01%2F2020&max_date=07%2F31%2F2020 (last visited Aug. 12, 2020); Ads by Senate Leadership Fund, Facebook Ad Library, FACEBOOK, [https://www.facebook.com/ads/library/?active_status=all&ad_type=political_and_issue_ads&country=US&impression_search_field=has_impressions_lifetime&view_all_page_id=1576552839287418&sort_data\[direction\]=des](https://www.facebook.com/ads/library/?active_status=all&ad_type=political_and_issue_ads&country=US&impression_search_field=has_impressions_lifetime&view_all_page_id=1576552839287418&sort_data[direction]=des)

c&sort_data[mode]=relevancy_monthly_grouped (last visited Aug. 12, 2020) (showing no ads placed by Senate Leadership Fund for the relevant races and time period); Ads by Senate Leadership Fund, Google Transparency Report, GOOGLE, <https://transparencyreport.google.com/political-ads/advertiser/AR230475229367894016> (last visited Aug. 12, 2020) (showing no ads placed by Senate Leadership Fund for the relevant races).

² Future Progress, Independent Expenditures Supporting Eddie J. Mauro (24- and 48- hour reports), 2020, FEC.gov, https://www.fec.gov/data/independent-expenditures/?data_type=processed&committee_id=C00746628&is_notice=true&most_recent=true&min_date=01%2F01%2F2020

(last visited Aug. 12, 2020), Ads by Future Progress, Facebook Ad Library, FACEBOOK, [https://www.facebook.com/ads/library/?active_status=all&ad_type=political_and_issue_ads&country=US&impression_search_field=has_impressions_lifetime&q=future%20progress&sort_data\[direction\]=desc&sort_data\[mode\]=relevancy_monthly_grouped](https://www.facebook.com/ads/library/?active_status=all&ad_type=political_and_issue_ads&country=US&impression_search_field=has_impressions_lifetime&q=future%20progress&sort_data[direction]=desc&sort_data[mode]=relevancy_monthly_grouped) (last visited Aug. 12, 2020) (showing no ads placed by “Future Progress”); Ads by Future Progress, Google Transparency Report, GOOGLE, https://transparencyreport.google.com/political-ads/region/US?creative_by_advertiser=region:US;q:Future%20Progress;start:1527724800000;end:1596671999999;spend;;impressions;;type;;sort:3&lu=creative_by_advertiser (last visited Aug. 12, 2020) (showing no ads placed by “Future Progress”).

³ Democratic Progress, Independent Expenditures Supporting Thomas McDermott Jr. (24- and 48- hour reports), 2020, FEC.gov, https://www.fec.gov/data/independent-expenditures/?data_type=processed&committee_id=C00744813&is_notice=true&most_recent=true&support_oppose_indicator=S&candidate_office=H&candidate_office_state=IN&candidate_office_district=01&min_date=01%2F01%2F2020

(last visited Aug. 12, 2020); Ads by Democratic Progress, Facebook Ad Library, FACEBOOK, [https://www.facebook.com/ads/library/?active_status=all&ad_type=political_and_issue_ads&country=US&impression_search_field=has_impressions_lifetime&q=democratic%20progress&sort_data\[direction\]=desc&sort_data\[mode\]=relevancy_monthly_grouped](https://www.facebook.com/ads/library/?active_status=all&ad_type=political_and_issue_ads&country=US&impression_search_field=has_impressions_lifetime&q=democratic%20progress&sort_data[direction]=desc&sort_data[mode]=relevancy_monthly_grouped) (last visited Aug. 12, 2020) (showing no ads placed by “Democratic Progress”); Ads placed by Democratic Progress, Google Transparency Report, GOOGLE, https://transparencyreport.google.com/political-ads/region/US?creative_by_advertiser=region:US;q:democratic%20progress;start:1527724800000;end:1596671999999;spend;;impressions;;type;;sort:3&lu=creative_by_advertiser (last visited Aug. 12, 2020) (showing no ads placed by “Democratic Progress”).

⁴ Hoosier Heartland Fund, Independent Expenditures Supporting Micah Beckwith (24- and 48- hour reports), 2020, FEC.gov, https://www.fec.gov/data/independent-expenditures/?data_type=processed&committee_id=C00722447&is_notice=true&most_recent=true&min_date=01%2F01%2F2020

(last visited Aug. 12, 2020); Ads placed by Hoosier Heartland, Facebook Ad Library, FACEBOOK, [https://www.facebook.com/ads/library/?active_status=all&ad_type=political_and_issue_ads&country=US&impression_search_field=has_impressions_lifetime&q=Hoosier%20Heartland%20Fund&sort_data\[direction\]=desc&sort_data\[mode\]=relevancy_monthly_grouped](https://www.facebook.com/ads/library/?active_status=all&ad_type=political_and_issue_ads&country=US&impression_search_field=has_impressions_lifetime&q=Hoosier%20Heartland%20Fund&sort_data[direction]=desc&sort_data[mode]=relevancy_monthly_grouped) (last visited Aug. 12, 2020) (showing “Hoosier Heartland Fund” ad record page has been deleted); Ads placed by Hoosier Heartland Fund, Google Transparency Report, GOOGLE, https://transparencyreport.google.com/political-ads/region/US?creative_by_advertiser=region:US;q:Hoosier%20Heartland%20Fund;start:1527724800000;end:1596671999999;spend;;impressions;;type;;sort:3&lu=creative_by_advertiser (last visited Aug. 12, 2020) (showing no ads placed by “Hoosier Heartland Fund”).

⁵ With Honor Fund, Independent Expenditures Supporting Thomas McDermott Jr. (24- and 48- hour reports), 2020, FEC.gov, https://www.fec.gov/data/independent-expenditures/?data_type=processed&committee_id=C00659011&is_notice=true&most_recent=true&candidate_office_state=IN&candidate_office_district=01&min_date=01%2F01%2F2020

(last visited Aug. 12, 2020); Ads by With Honor Fund, Facebook Ad Library, Facebook, [https://www.facebook.com/ads/library/?active_status=all&ad_type=political_and_issue_ads&country=US&impression_search_field=has_impressions_lifetime&q=With%20Honor%20Fund&sort_data\[direction\]=desc&sort_data\[mode\]=relevancy_monthly_grouped](https://www.facebook.com/ads/library/?active_status=all&ad_type=political_and_issue_ads&country=US&impression_search_field=has_impressions_lifetime&q=With%20Honor%20Fund&sort_data[direction]=desc&sort_data[mode]=relevancy_monthly_grouped) (last visited Aug. 12, 2020) (showing no ads placed by “With Honor Fund” in relevant race); Ads by With Honor Fund, Google Transparency Report, Google, https://transparencyreport.google.com/political-ads/region/US?creative_by_advertiser=region:US;q:with%20honor%20fund;start:1527724800000;end:1596671999999;spend;;impressions;;type;;sort:3&lu=creative_by_advertiser (last visited Aug. 12, 2020) (showing no ads placed by “With Honor Fund” in relevant race).

⁶ House Freedom Fund, Independent Expenditures Supporting Scott Perry (24- and 48- hour reports), 2020, FEC.gov, https://www.fec.gov/data/independent-expenditures/?data_type=processed&committee_id=C00552851&is_notice=true&most_recent=true&support_oppose_indicator=S&candidate_office_state=PA&candidate_office_district=10&min_date=01%2F01%2F2020

(last visited Aug. 12, 2020); Ads placed by House Freedom Fund, Facebook Ad Library, FACEBOOK, [https://www.facebook.com/ads/library/?active_status=all&ad_type=political_and_issue_ads&country=US&impression_search_field=has_impressions_lifetime&q=House%20Freedom%20Fund&sort_data\[direction\]=desc&sort_data\[mode\]=relevancy_monthly_grouped](https://www.facebook.com/ads/library/?active_status=all&ad_type=political_and_issue_ads&country=US&impression_search_field=has_impressions_lifetime&q=House%20Freedom%20Fund&sort_data[direction]=desc&sort_data[mode]=relevancy_monthly_grouped)

rt_data[mode]=relevancy_monthly_grouped (last visited Aug. 12, 2020) (showing no ads placed by “House Freedom Fund”); Ads placed by House Freedom Fund, Google Transparency Report, GOOGLE, https://transparencyreport.google.com/political-ads/region/US?creative_by_advertiser=region:US;q:House%20Freedom%20Fund;start:1527724800000;end:1596671999999;spend;;impressions;;type;;sort:3&lu=creative_by_advertiser (last visited Aug. 12, 2020) (showing no ads placed by “House Freedom Fund”).

⁷ House Freedom Fund, Independent Expenditures Supporting Matt Rosendale (24- and 48- hour reports), 2020, FEC.gov, https://www.fec.gov/data/independent-expenditures/?data_type=processed&committee_id=C00552851&is_notice=true&most_recent=true&candidate_office_state=MT&min_date=01%2F01%2F2020 (last visited Aug. 12, 2020); Facebook Ads *supra* note 6; Google Ads placed by House Freedom Fund, *supra* note 6.

⁸ America’s Constitution PAC, Independent Expenditures Opposing James D. Scholten (24- and 48- hour reports), 2020, FEC.gov, https://www.fec.gov/data/independent-expenditures/?data_type=processed&committee_id=C00648899&is_notice=true&most_recent=true&candidate_office_state=IA&min_date=01%2F01%2F2020 (last visited Aug. 12, 2020); Ads placed by America’s Constitution PAC, Facebook Ad Library, FACEBOOK, https://www.facebook.com/ads/library/?active_status=all&ad_type=all&country=US&impression_search_field=has_impressions_lifetime&view_all_page_id=1765859020328311 (last visited Aug. 12, 2020) (showing no ads placed by “America’s Constitution PAC”); Ads placed by America’s Constitution PAC, Google Transparency Report, GOOGLE, [https://www.facebook.com/ads/library/?active_status=all&ad_type=political_and_issue_ads&country=US&impression_search_field=has_impressions_lifetime&q=America%27s%20Constitution%20PAC&sort_data\[direction\]=desc&sort_data\[mode\]=relevancy_monthly_grouped](https://www.facebook.com/ads/library/?active_status=all&ad_type=political_and_issue_ads&country=US&impression_search_field=has_impressions_lifetime&q=America%27s%20Constitution%20PAC&sort_data[direction]=desc&sort_data[mode]=relevancy_monthly_grouped) (last visited Aug. 12, 2020) (showing no ads placed by “America’s Constitution PAC”).

⁹ LV Strong, Independent Expenditures Supporting Lisa Scheller (24- and 48- hour reports), 2020, FEC.gov, https://www.fec.gov/data/independent-expenditures/?data_type=processed&committee_id=C00743377&is_notice=false&most_recent=true&candidate_id=H0PA07132&min_date=01%2F01%2F2020 (last visited Aug. 12, 2020); Ads placed by LV Strong, Facebook Ad Library, FACEBOOK, [https://www.facebook.com/ads/library/?active_status=all&ad_type=political_and_issue_ads&country=US&impression_search_field=has_impressions_lifetime&view_all_page_id=102594174786839&sort_data\[direction\]=desc&sort_data\[mode\]=relevancy_monthly_grouped](https://www.facebook.com/ads/library/?active_status=all&ad_type=political_and_issue_ads&country=US&impression_search_field=has_impressions_lifetime&view_all_page_id=102594174786839&sort_data[direction]=desc&sort_data[mode]=relevancy_monthly_grouped) (last visited Aug. 12, 2020); Ads placed by LV Strong, Google Transparency Report, GOOGLE, https://transparencyreport.google.com/political-ads/region/US?creative_by_advertiser=region:US;q:LV%20Strong;start:1527724800000;end:1596671999999;spend;;impressions;;type;;sort:3&lu=creative_by_advertiser (last visited Aug. 12, 2020) (showing no ads placed by “LV Strong”).

¹⁰ LV Strong, Independent Expenditures Supporting Frank Pallotta (24- and 48- hour reports), 2020, FEC.gov, https://www.fec.gov/data/independent-expenditures/?data_type=processed&committee_id=C00743377&is_notice=false&most_recent=true&candidate_id=H0NJ05174&min_date=01%2F01%2F2020 (last visited Aug. 12, 2020); Facebook ads by LV Strong, *supra* note 9; Google ads by LV Strong, *supra* note 9.

¹¹ DMFI Pac, Independent Expenditures Opposing Valerie Plame (24- and 48- hour reports), 2020, FEC.gov, https://www.fec.gov/data/independent-expenditures/?data_type=processed&committee_id=C00710848&is_notice=true&most_recent=true&candidate_office_state=NM&min_date=01%2F01%2F2020 (last visited Aug. 12, 2020); Ads by DMFI PAC, Facebook Ad Library, FACEBOOK, [https://www.facebook.com/ads/library/?active_status=all&ad_type=political_and_issue_ads&country=US&impression_search_field=has_impressions_lifetime&q=plame&view_all_page_id=259212814698356&sort_data\[direction\]=desc&sort_data\[mode\]=relevancy_monthly_grouped](https://www.facebook.com/ads/library/?active_status=all&ad_type=political_and_issue_ads&country=US&impression_search_field=has_impressions_lifetime&q=plame&view_all_page_id=259212814698356&sort_data[direction]=desc&sort_data[mode]=relevancy_monthly_grouped) (last visited Aug. 12, 2020); Ads by DMFI PAC, Google Transparency Report, GOOGLE, https://transparencyreport.google.com/political-ads/region/US?creative_by_advertiser=region:US;q:DMFI%20Pac;start:1527724800000;end:1596499199999;spend;;impressions;;type;;sort:3&lu=creative_by_advertiser (last visited Aug. 12, 2020) (showing no ads placed by “DMFI PAC” in relevant race).

¹² CHC Bold PAC, Independent Expenditures Supporting Scott Perry (24- and 48- hour reports), 2020, FEC.gov, https://www.fec.gov/data/independent-expenditures/?data_type=processed&committee_id=C00365536&is_notice=true&most_recent=true&candidate_id=H0NM03102&min_date=01%2F01%2F2020 (last visited Aug. 12, 2020); Ads by CHC Bold PAC, Facebook Ad Library, FACEBOOK, [https://www.facebook.com/ads/library/?active_status=all&ad_type=political_and_issue_ads&country=US&impression_search_field=has_impressions_lifetime&view_all_page_id=327120867486483&sort_data\[direction\]=desc&sort_data\[mode\]=relevancy_monthly_grouped](https://www.facebook.com/ads/library/?active_status=all&ad_type=political_and_issue_ads&country=US&impression_search_field=has_impressions_lifetime&view_all_page_id=327120867486483&sort_data[direction]=desc&sort_data[mode]=relevancy_monthly_grouped) (last visited Aug. 12, 2020); Ads by CHC Bold PAC, Google Transparency Report, GOOGLE, https://transparencyreport.google.com/political-ads/region/US?creative_by_advertiser=region:US;q:SEAL%20PAC;start:1527724800000;end:1596671999999;spend;;impressions;;type;;sort:3&lu=creative_by_advertiser

nd;;impressions;;type;;sort:3&lu=creative_by_advertiser (last visited Aug. 12, 2020) (showing no ads placed by "CHC Bold PAC").

¹³ SEAL PAC Supporting Electing American Leaders PAC, Independent Expenditures Supporting Scott Perry (24- and 48- hour reports), 2020, FEC.gov, https://www.fec.gov/data/independent-expenditures/?data_type=processed&committee_id=C00570226&is_notice=true&most_recent=true&candidate_office_state=PA&candidate_office_district=10&min_date=01%2F01%2F2020 (last visited Aug. 12, 2020); Ads by SEAL PAC, Facebook Ad Library, FACEBOOK, [https://www.facebook.com/ads/library/?active_status=all&ad_type=political_and_issue_ads&country=US&impression_search_field=has_impressions_lifetime&view_all_page_id=327120867486483&sort_data\[direction\]=desc&sort_data\[mode\]=relevancy_monthly_grouped](https://www.facebook.com/ads/library/?active_status=all&ad_type=political_and_issue_ads&country=US&impression_search_field=has_impressions_lifetime&view_all_page_id=327120867486483&sort_data[direction]=desc&sort_data[mode]=relevancy_monthly_grouped) (last visited Aug. 12, 2020); Ads by SEAL PAC, Google Transparency Report, GOOGLE, https://transparencyreport.google.com/political-ads/region/US?creative_by_advertiser=region:US;q:SEAL%20PAC;start:1527724800000;end:1596671999999;spend;;impressions;;type;;sort:3&lu=creative_by_advertiser (last visited Aug. 12, 2020) (showing no ads placed by "SEAL PAC").

¹⁴ Protect Freedom PAC, Independent Expenditures Supporting Matt Rosendale (24- and 48- hour reports), 2020, FEC.gov, https://www.fec.gov/data/independent-expenditures/?data_type=processed&committee_id=C00657866&is_notice=true&most_recent=true&candidate_office_state=MT&min_date=01%2F01%2F2020 (last visited Aug. 12, 2020); Ads by Protect Freedom PAC, Facebook Ad Library, FACEBOOK, [https://www.facebook.com/ads/library/?active_status=all&ad_type=political_and_issue_ads&country=US&impression_search_field=has_impressions_lifetime&q=rosendale&view_all_page_id=495950117447546&sort_data\[direction\]=desc&sort_data\[mode\]=relevancy_monthly_grouped](https://www.facebook.com/ads/library/?active_status=all&ad_type=political_and_issue_ads&country=US&impression_search_field=has_impressions_lifetime&q=rosendale&view_all_page_id=495950117447546&sort_data[direction]=desc&sort_data[mode]=relevancy_monthly_grouped) (last visited Aug. 12, 2020); Ads by Protect Freedom PAC, Google Transparency Report, GOOGLE, https://transparencyreport.google.com/political-ads/region/US?creative_by_advertiser=region:US;q:Protect%20Freedom%20PAC;start:1527724800000;end:1596671999999;spend;;impressions;;type;;sort:3&lu=creative_by_advertiser (last visited Aug. 12, 2020) (showing no ads placed by "Protect Freedom PAC").

¹⁵ Perise Practical, Independent Expenditures in Support of Teresa Leger Fernandez (24- and 48- hour reports), 2020, FEC.gov, https://www.fec.gov/data/independent-expenditures/?data_type=processed&committee_id=C90019324&is_notice=true&most_recent=true&candidate_id=HONM03102&min_date=01%2F01%2F2020 (last visited Aug. 12, 2020); Ads by Perise Practical, Facebook Ad Library, FACEBOOK, [https://www.facebook.com/ads/library/?active_status=all&ad_type=political_and_issue_ads&country=US&impression_search_field=has_impressions_lifetime&view_all_page_id=108342997437676&sort_data\[direction\]=desc&sort_data\[mode\]=relevancy_monthly_grouped](https://www.facebook.com/ads/library/?active_status=all&ad_type=political_and_issue_ads&country=US&impression_search_field=has_impressions_lifetime&view_all_page_id=108342997437676&sort_data[direction]=desc&sort_data[mode]=relevancy_monthly_grouped) (last visited Aug. 12, 2020); Ads by Perise Practical, Google Transparency Report, GOOGLE, https://transparencyreport.google.com/political-ads/advertiser/AR405064825316573184?campaign_creatives=start:1588291200000;end:1596067199999;spend;;impressions;;type;;sort:3&lu=campaign_creatives (last visited Aug. 12, 2020). Perise Practical is a 501(c)(4) corporation, rather than a super PAC, and does not publicly disclose its donors.

¹⁶ Perise Practical, Independent Expenditures in support of Eliot Engel (24- and 48- hour reports), 2020, FEC.gov, https://www.fec.gov/data/independent-expenditures/?data_type=processed&committee_id=C90019324&is_notice=true&most_recent=true&min_date=01%2F01%2F2020 (last visited Aug. 12, 2020); Facebook ads by Perise Practical, *supra* note 15; Google ads by Perise Practical, *supra* note 15.