BEFORE THE FEDERAL ELECTION COMMISSION

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END CITIZENS UNITED PAC
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ROGER G. WIEAND
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v.

PROTECT OHIO VALUES PAC (POV PAC)
Vicki Hoffman, Treasurer
100 E Campus View Blvd, Ste 250
Columbus, OH 43235-4682

JD VANCE FOR SENATE INC.
Lisa Lisker, Treasurer
PO Box 6564
Cincinnati, OH 45206

MUR No. __________

COMPLAINT

1. During the 2022 election, Protect Ohio Values PAC, a super PAC, spent over $1 million on polling and voter targeting information — i.e., campaign strategy materials — and developed a detailed campaign advertising proposal, all of which it provided for free, through an obscure website, to J.D. Vance’s campaign for the U.S. Senate in Ohio. Vance’s campaign, in turn, used these materials to advance Vance’s candidacy, including by producing a campaign ad based on the Protect Ohio Values ad script. Accordingly, there is reason to believe that Protect Ohio Values made, and Vance’s campaign knowingly accepted, illegal contributions in violation of federal campaign finance laws.¹

¹ See 52 U.S.C. §§ 30104(b), 30116(a), 30116(f), 30118(a).
2. This complaint is filed pursuant to 52 U.S.C. § 30109(a)(1) and is based on information and belief that Protect Ohio Values PAC (POV PAC) and JD Vance for Senate Inc. violated the Federal Election Campaign Act (“FECA”), 52 U.S.C. § 30101, et seq. “If the Commission, upon receiving a complaint…has reason to believe that a person has committed, or is about to commit, a violation of [FECA]…[t]he Commission shall make an investigation of such alleged violation.”

FACTS

3. Protect Ohio Values PAC (POV PAC) (“Protect Ohio Values”) was originally established as an independent-expenditure only political committee (“IEOPC”) that registered with the FEC on February 24, 2021. It later reorganized as a nonqualified committee that maintains a segregated non-contribution account, i.e., a “hybrid PAC,” amending its FEC registration on November 15, 2021. The committee’s treasurer is Vicki J. Hoffman.

4. J.D. Vance is a candidate for the U.S. Senate in Ohio. His authorized campaign committee, JD Vance for Senate, Inc. (the “Vance Committee”), registered with the Commission on July 1, 2021, and Lisa Lisker is its treasurer.

5. Protect Ohio Values has made over $7.5 million in independent expenditures supporting Vance’s candidacy. It has not reported making independent expenditures supporting or

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2 52 U.S.C. § 30109(a)(2) (emphasis added); see also 11 C.F.R. § 111.4(a).
3 Protect Ohio Values PAC (POV PAC), Statement of Org. (Feb. 24, 2021).
4 Protect Ohio Values PAC (POV PAC), Amend. Statement of Org. (Nov. 15, 2021). Protect Ohio Values has represented to the FEC that the funds maintained in its non-contribution account “will not be used to make contributions, whether direct, in-kind, or via coordinated communications, or coordinated expenditures, to federal candidates or committees.” Id.
5 Id.
6 J.D. Vance, Statement of Candidacy (July 1, 2021).
opposing any other federal candidates. In addition, it has made well over $2 million in other disbursements during the 2022 election cycle.9

6. Vance won the Republican primary election for U.S. Senate in Ohio held on May 3, 2022.

7. Also on May 3, 2022, Politico reported the existence of a “secret website,” operated by Protect Ohio Values for the purpose of directly supporting the efforts of Vance’s campaign committee.10 According to Politico, Luke Thompson, Protect Ohio Values’ Executive Director, set up the website and used it to publish “a trove of sensitive documents — from thousands of pages of polling data, to memos assessing the strengths and weaknesses of Vance’s opponents, to a 177-page opposition research book detailing all of the areas where Vance’s opponents might attack him. There were suggested lines for Vance to use on the campaign trail, and even guidance on how the candidate could win Trump’s endorsement.”11 Politico reported that the “intended audience” for this information was the Vance Committee.12

8. The Protect Ohio Values website was published under the username “@protectohiovaluesforms” on Medium.com, a free online publishing platform that allows registered users to create and publish content.13

9. A Google search for the exact terms “protect ohio values” and “medium.com” as of May 2, 2022 — i.e., the day before the Politico article widely publicized the existence of the

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11 Id.
12 Id.
Protect Ohio Values website — did not return a result for the Protect Ohio Values website.\textsuperscript{14} In other words, before it was identified in the Politico article, the trove of information that Protect Ohio Values posted on Medium.com was essentially hidden from public view, even if someone knew exactly what to search for.

10. A post on the Protect Ohio Values website dated October 4, 2021 (when Protect Ohio Values was still an IEOPC) details Protect Ohio Values’ initial role in directly outsourcing services to aid Vance before he even formally declared his candidacy:\textsuperscript{15}

At Protect Ohio Values (POV), we have worked to amplify JD’s unique strengths while \textit{lightening the challenges he faces} as a rookie candidate. . . . As a result, in addition to fulfilling traditional Super PAC roles, POV has broken new ground. This memo outlines some of the novel roles played by POV. When JD was investigating whether he wanted to run for office, POV began to build out a campaign-in-waiting. JD created an exploratory committee called the Ohio Values Project, which paid for a staffer and allowed him to travel, speak with potential donors, and make an informed choice about running. Operating independently, \textit{POV recruited, vetted, and hired staff who later joined JD as his candidacy approached}. This helped his campaign save resources and get off to a quick start. Before JD’s July 1 announcement, we at POV \textit{sent crews to shoot b-roll} of Middletown, to follow JD around several events in the Cincinnati area, and ultimately to cut together two videos.\textsuperscript{16}

11. In the same post, Protect Ohio Values details its extensive opposition research and polling on behalf of Vance, stating that it “hired pollster Tony Fabrizio and the industry-leading opposition researchers at Prospect Strategic. Our researchers compiled extensive dossiers

\textsuperscript{14} Google Search Results, https://www.google.com/search?q=%22protect+ohio+values%22+medium.com&source=ln&tbm=chr&dr=r&dsr=1&ei=1hPbYq0sC6ZP8Q_SnlIDBw&hl=en&sa=X&ved=2ahUKEwi34e2HPlPfAhV00lQHHRaMB1cQ_AUOAcE&sclient=psy1 (last visited May 14, 2022). See Exhibit C. The same is true for the search terms “JD Vance,” “POV,” and medium.com. See Exhibit D.

\textsuperscript{15} Protect Ohio Values could not lawfully provide pre-candidacy “testing the waters” support for Vance because “[o]nly funds permissible under the Act may be used for such activities,” 11 C.F.R. § 100.131, thus excluding IEOPCs and the noncontribution accounts of hybrid PACs, which can solicit and accept prohibited corporate contributions, see note 39, infra.

on JD and his opponents. Tony then conducted a series of four polls, from April to August, to inform our thinking about the race. We tested a set of policy positions and messages based on JD’s public statements, JD’s vulnerabilities, and the vulnerabilities of our leading opponents.”

12. The post also provided actual poll results, including the following:

13. That October 4, 2021, post went on to detail POV’s further actions to directly “shoulder the cost” of data modeling for Vance by contracting with the same data science company hired by Vance’s campaign and paying that company to test different issues and messages for the campaign, which were intended to then be made available to the campaign without cost:

[W]e hired the data science company DeepRoot to build a series of models and segments around different issue concerns and messages. The campaign is also hiring DeepRoot to provide data services. The campaign will therefore be able to access the modeled universes POV has created, and POV will be able to access voter contact data uploaded into the database by the

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This arrangement allows POV to bring presidential-level targeting sophistication to JD’s campaign without expecting the campaign to shoulder the cost of audience construction.\textsuperscript{18}

The post continued by providing detailed maps, models, and strategic insights apparently obtained from its data vendors, outlining different campaign strategies for Vance.

Examples of the content provided include the following:

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\textsuperscript{18} See POV, “Breaking New Ground,” supra (emphases added).
14. Protect Ohio Values used the Medium website to communicate specific suggestions to the Vance Committee. In a February 17, 2022, post titled “The Next Step,” Protect Ohio Values argued that to “win a Trump endorsement,” Vance should “own a critical issue,” and suggested that should be “the question of immigration”:

For decades Republican voters have demanded we create a merit based immigration system, reduce numbers, and fix our broken borders… JD can personalize our broken border. He has unique credibility on the issue. **He has a compelling personal story about drugs and addiction.** That story is far too common due to the drugs and crime that flow across the southern border. He can connect that story to deindustrialization and the decline of the family. As a result, when he commits to being strong on borders, immigration, and crime, people will believe him.19

15. Protect Ohio Values used the Medium website to provide the Vance Committee with advertising content it developed for Vance, complete with a suggested script and guidance that the ad be shot as “a direct to camera ad” with Vance:

saying something like ‘I was raised by my grandparents because my mother got addicted to opioids. Today, fentanyl pours over our border, poisoning our people. Joe Biden doesn’t care. Career politicians in both parties just talk. Enough is enough. As your senator, I will declare the drug cartels terrorist organizations. Any country that refuses to accept deported illegals will lose its foreign aid. This is personal to me.20

Protect Ohio Values even scripted a candidate disclaimer for Vance: “I’m JD Vance and I approve this message because no kid should have to grow up without a mother.”21

16. The February 17 post also included guidance about how this ad should be disseminated:

“Again, if we could do a direct to camera ad like the one above, we would spend the money

20 Id.
21 Id.
and put it on cable starting at the end of this month at a steady $80k per week burn at the
candidate rates.”

17. Protect Ohio Values made clear that it had developed this advertising content and was
providing this strategic guidance for use by the Vance Committee, repeatedly stating that it
could not produce or run the ad itself because “we’re the Super PAC, so we can’t do
that.”

18. On April 5, 2022, the Vance Committee adopted POV’s suggested campaign expenditures
when it reportedly spent $1 million to air immigration-focused ads that directly drew on the
ideas and language provided in Protect Ohio Values’ February 17 post. The ad featured
Vance speaking directly to the camera saying, “Joe Biden’s open border is killing Ohioans,
with more illegal drugs and more Democrat voters pouring into this country. This issue is
personal. I nearly lost my mother to the poison coming across our border. No child should
grow up an orphan.”

19. The Protect Ohio Values website on Medium.com was theoretically accessible to the
public, but reports indicate that its existence was not widely known, and it did not turn up
from Google searches using even the most obvious terms: “Protect Ohio Values,” “POV”
and “JD Vance.” Protect Ohio Values does not appear to have advertised its Medium
webpage to the public, and there is no indication that anyone else publicized it prior to the
May 3, 2022, Politico article — i.e., the day of the Ohio primary election. When the

22 Id.
23 Id.
24 See Tyler Olson and Paul Steinhauser, JD Vance hits Biden on immigration in $1 million Ohio ad buy as
president set to roll back Title 42, Fox News (April 5, 2022), https://www.foxnews.com/politics/ohio-jd-vance-
biden-immigration-border-wall-title-42.
25 See JD Vance for Senate, Are You A Racist?, YOUTUBE (APR. 5, 2022),
https://www.youtube.com/watch?v=K3qYJoSV0lI (last visited May 10, 2022) (“Vance Committee Ad”).
Politico article was published, the POV website had only a single “follower” or subscriber, and that subscriber was the cofounder of one of Protect Ohio Values’ main media vendors, which had provided some of the materials posted on the website.

Protect Ohio Values’ actions, and statements by its Executive Director, confirm that the Medium website was not intended for the general public. According to Politico, when the campaign of one of Vance’s primary opponents was discovered using a 98-page internal polling memo posted on the Medium website, Protect Ohio Values treated this as a data breach: it initiated an internal investigation to find the “leaker” responsible for this “serious blow.” Protect Ohio Values’ Executive Director, Thompson, reportedly said: “We knew we were going to have less to work with from the start, so we had to take risks [and] [t]hat included risking having all of our research in public.” Thompson reportedly “tried to determine if someone might have accessed the document from the Medium platform by examining the server’s logs.”

SUMMARY OF THE LAW

Under FECA, a “contribution” includes “any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for Federal office.” “Anything of value” includes all in-kind contributions. An in-kind contribution includes the provision without charge (or at less than the usual and normal

28  Isenstadt, Politico Article, supra.
29  Id.
30  Id.
31  52 U.S.C. § 30101(8)(A)(i); see also 11 C.F.R. §§ 100.52(a), 114.1(a)(1).
32  11 C.F.R. § 100.52(d)(1).
charge) of any goods or services, including, but not limited to, “facilities, equipment, supplies, personnel, advertising services, membership lists, and mailing lists.”

22. For the 2022 election cycle, FECA’s statutory limit on the aggregate amount a federal candidate or their authorized campaign committee may accept from an individual contributor is $2,900 per election. Contributions from a multicandidate committee to a candidate or their authorized committee may not exceed $5,000 per calendar year. FECA prohibits any candidate or committee from knowingly accepting any contribution that exceeds these limits.

23. FECA prohibits a corporation or labor organization from making a contribution to a federal candidate or their authorized committee, and prohibits federal candidates and their authorized committees from knowingly accepting any such contribution.

24. Moreover, FECA requires that all political committees file periodic disclosure reports detailing all receipts and disbursements, including all contributions, in-kind or otherwise.

25. Independent-expenditure only political committees (“IEOPCs”) and the segregated non-contribution accounts of hybrid PACs are permitted to solicit and raise unlimited contributions, including contributions from corporations and labor organizations — i.e., funds beyond FECA’s amount limitations and source prohibitions — so long as these funds are used exclusively to make independent expenditures, not contributions to candidates.

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33 Id.
34 52 U.S.C § 30116(a)(1).
38 52 U.S.C. § 30104(a), (b).
CAUSE OF ACTION

COUNT I:

PROTECT OHIO VALUES (POV PAC) MADE AND JD VANCE FOR SENATE INC. KNOWINGLY ACCEPTED PROHIBITED, EXCESSIVE, AND UNREPORTED IN-KIND CONTRIBUTIONS

26. The available information provides reason to believe that Protect Ohio Values paid for a variety of campaign materials, including polling data, demographic voter targeting models, strategic insights based on this data, ideas and scripts for campaign communications, and raw footage of Vance — all of which it published on an obscure website that was not widely publicized, intending for the Vance Committee to obtain and make use of the materials.

27. Despite the website not being widely known to the public, the materials that Protect Ohio Values paid for and provided on the site were incorporated into the Vance Committee’s campaign communications. These facts provide reason to believe that Protect Ohio Values communicated to the Vance Committee that the materials and information would be available on the website and that the Vance Committee accessed the valuable material that Protect Ohio Values provided to it through the obscure website.

28. Under FECA, a “contribution” includes “anything of value” provided “for the purpose of influencing any election for Federal office,” and Commission regulations provide that the term includes “all in-kind contributions.” The Commission’s regulation specifically lists “membership lists” and “mailing lists” as illustrative examples of a good or service which, when provided at no charge or a reduced charge, results in an in-kind contribution to the recipient committee. Like “membership lists” and “mailing lists,” polling, voter targeting data, b-roll of the candidate, and scripts and ideas for campaign communications are

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40 52 U.S.C. § 30101(8)(A)(i); 11 C.F.R. §§ 100.52(d).
intangible “goods” and “services” that, when paid for and provided at no charge by a third
party, convey a potential benefit to — and reduce the attendant costs for — the recipient
campaign committee. Accordingly, there is reason to believe these goods and services were
in-kind contributions, even if the information was also theoretically available to others.

29. As explained above, the Protect Ohio Values website was not “publicly available” in any
meaningful sense. Instead, the website was virtually impossible to find even if someone
had searched for it using the most obvious terms — e.g., “Protect Ohio Values” and “J.D.
Vance” — and thus could only be accessed by someone who knew of its existence and
where to find it. Indeed, Politico’s reporting further corroborates that view: when someone
outside the Vance Committee somehow obtained one of the strategy documents posted on
the website, Protect Ohio Values started looking for a “leaker,” assuming that someone had
tipped off Vance’s opponent’s campaign.

30. The obscurity of the website undermines any reasonable argument that Protect Ohio Values
did not make a contribution because it made campaign materials (that it had paid for)
publicly available, at no charge. Of course, the fact that Protect Ohio Values put materials
that it spent well over $1 million to procure on an obscure website also supports the logical
conclusion that the committee must have taken measures to ensure the materials were
found by the intended recipient — the Vance Committee. And the record contains
information plainly indicating that the Vance Committee did, in fact, find and make use of
the materials on the website. Overall, thus, the website’s obscurity to the general public,
combined with the fact that the Vance Committee apparently made use of the materials on
the site, supports finding reason to believe that Protect Ohio Values effectively used the
website as a private delivery mechanism to provide valuable campaign materials to the Vance Committee at no charge, resulting in illegal in-kind contributions.

31. The Commission has previously found that if a third party uses its resources to provide materials to a campaign free of charge, it has made an in-kind contribution, even if some of the materials provided are based on publicly available information. In MUR 5409, the Commission determined that a third-party organization that had compiled lists of its meeting attendees, and provided those lists to a campaign, thereby made an in-kind contribution.\textsuperscript{41} The Commission rejected the argument that the materials were not a contribution because they conveyed “information [that was] updated regularly and [was] publicly available . . . from various public sources . . . [and] was neither proprietary nor confidential,”\textsuperscript{42} concluding instead that because the third party “utilized its resources to obtain and compile” them — such that “it is not clear that the materials were in fact available except as provided” — the materials given to the campaign met “the Act’s broad definition of ‘contribution.’”\textsuperscript{43}

32. The facts in this complaint present a similar issue. The Commission should, accordingly, find reason to believe that Protect Ohio Values has used its own resources to procure and provide campaign materials free of charge to the Vance Committee, thereby making in-kind contributions, even if the materials were, \textit{arguendo}, publicly available (though as explained above,\textsuperscript{44} it does not appear that these materials were, in fact, readily available to the public).

\textsuperscript{41} First Gen. Counsel’s Report at 10, MUR 5409 (Norquist, \textit{et al.}) (adopted as dispositive); see Certification, MUR 5409 (Oct. 19, 2004), (approving, by a 5-1 vote, all recommendations in the First General Counsel’s Report).
\textsuperscript{42} Resp. of Americans for Tax Reform and Grover Norquist at 1, MUR 5409 (May 24, 2004).
\textsuperscript{43} First Gen. Counsel’s Report at 10, MUR 5409 (Norquist, \textit{et al.}) (adopted as dispositive).
\textsuperscript{44} See ¶¶ 19-20, \textit{supra}. 
33. Specifically, the available facts provide reason to believe that Protect Ohio Values “utilized its resources to obtain and compile”\(^{45}\) a variety of valuable campaign materials, including by establishing its own contracts with the committee’s vendors to ensure the campaign would “be able to access” the material produced by the vendor at Protect Ohio Values’ expense,\(^{46}\) thereby giving the Vance Committee the benefit of these goods or services while sparing it the attendant expenses.

34. According to Politico, Protect Ohio Values set up the website and used it to provide the campaign with “a trove of sensitive documents — from thousands of pages of polling data, to memos assessing the strengths and weaknesses of Vance’s opponents, to a 177-page opposition research book detailing all of the areas where Vance’s opponents might attack him.”\(^{47}\) All of these types of campaign materials are goods or services that Protect Ohio Values “utilized its resources to obtain” and which would provide a potential benefit to the Vance Committee, at no cost.

35. In a post on the website dated October 4, 2021 — i.e., during the period that Protect Ohio Values was organized as an IEOPC, when all of its funds were ineligible for candidate contributions — Protect Ohio Values emphasized that its efforts early in the primary contest saved the Vance Committee from having to spend its own funds: “POV recruited, vetted, and hired staff who later joined JD as his candidacy approached. This helped his campaign save resources and get off to a quick start.”\(^{48}\) The post also acknowledged hiring staffers to take video of Vance, which Protect Ohio Values later made available for the Vance Committee’s use. The post further acknowledged that Protect Ohio Values hired


\(^{46}\) POV, Breaking New Ground, supra.

\(^{47}\) Isenstadt, Politico Article, supra.

\(^{48}\) Breaking New Ground, supra (emphasis added).
well-known pollster and “industry-leading opposition researchers,” and made the results of that polling and research available to the Vance Committee.\textsuperscript{49}

36. The same October 4, 2021, post also noted that the Protect Ohio Values and the Vance Committee had deliberately hired the same data services vendor, DeepRoot, to craft an “arrangement” where “the campaign will therefore be able to access the modeled universes POV has created, and POV will be able to access voter contact data uploaded into the database by the campaign.” The post brazenly admits that this would give the Vance Committee the \textit{benefit} of sophisticated voter targeting data without incurring the attendant cost: “This arrangement allows POV to bring presidential-level targeting sophistication to JD’s campaign \textit{without expecting the campaign to shoulder the cost of audience construction}.”\textsuperscript{50} Protect Ohio Values’ language essentially reflects the Commission’s view in Advisory Opinion 2007-22, stating that “the provision of . . . items without charge \textit{would relieve} [a] \textit{campaign of the expense that it would otherwise incur} to obtain such materials [and thus] . . . would constitute a contribution.”\textsuperscript{51}

37. The post also provides voter targeting maps (images of which are excerpted above, \textit{supra} \textit{¶¶ 13–14}), which bear the DeepRoot logo in the bottom right corner — providing campaign insights like “All Vance Supporters” skew “54% Male” while “Best Vance Prospects / Undecided Voters” skew “60% Female.”\textsuperscript{52}

38. Protect Ohio Values’ Medium website also provided specific suggested content for campaign communications, including suggested advertisement scripts, and the Vance

\textsuperscript{49} See \textit{supra} \textit{¶ 12}.

\textsuperscript{50} Breaking New Ground, \textit{supra} (emphasis added).

\textsuperscript{51} Advisory Op. 2007-22 at 6 (Hurysz) (emphasis added); \textit{see} 11 C.F.R. § 100.52(d)(1) (“[T]he provision of any goods or services without charge or at a charge that is less than the usual and normal charge for such goods or services is a contribution.”).

\textsuperscript{52} See \textit{supra} \textit{¶ 13}. 
Committee appears to have used that material in its campaign communications, providing reason to believe that Protect Ohio Values underwrote or at least subsidized some of the campaign’s advertising costs.

39. In a February 17, 2022, Medium post titled “The Next Step,” Protect Ohio Values posted what appears to be field-tested guidance directed to the Vance Committee about how to earn the primary endorsement of former president Trump. Protect Ohio Values advised that Vance needed to “own a critical issue,” specifically suggesting that he focus on immigration because of his “unique credibility on the issue.” It further advised that Vance’s “compelling personal story about drugs and addiction” made him uniquely believable “when he commits to being strong on borders, immigration, and crime.” Based on the amount of voter research and polling that Protect Ohio Values paid for, there is reason to believe that this strategic advice had been field tested, i.e., that the guidance benefited from and reflected money Protect Ohio Values had spent on polling and message testing.

40. The February 17, 2022, post also provided a proposed advertisement for the Vance Committee — including a full script and even the candidate disclaimer — with Protect Ohio Values asserting that it “would love to shoot” the ad but could not do so because “we’re the Super PAC, so we can’t do that.” Protect Ohio Values proposed shooting “a direct to camera ad” — i.e., an ad where the candidate speaks to the camera, thus making eye contact with the viewer, and even provided detailed guidance on how this ad should be distributed, suggesting it be disseminated “on cable starting at the end of this month at a

54  Id.
55  Id.
56  Id.
steady $80k per week burn at the candidate rates.”57 Based on the amount of voter research and polling that Protect Ohio Values paid for, there is reason to believe that this strategic advertising advice benefited from and reflected money Protect Ohio values had spent on polling and message testing.

41. Less than two months later, on April 5, 2022, the Vance Committee reportedly spent $1 million on an immigration-focused ad.58 Just as Protect Ohio Values had recommended, the Vance Committee ad featured Vance speaking directly into the camera, with several key lines that are simply reconfigurations of (or alternatives for) the words used in the Protect Ohio Values script:

<table>
<thead>
<tr>
<th>Protect Ohio Values Proposed Ad Script59 (Feb. 17, 2022)</th>
<th>Vance Committee Ad60 (April 5, 2022)</th>
</tr>
</thead>
<tbody>
<tr>
<td>I was raised by my grandparents because my mother got addicted to opioids.</td>
<td>I nearly lost my mother to the poison coming across our border.</td>
</tr>
<tr>
<td>Today, fentanyl pours over our border, poisoning our people. Joe Biden doesn’t care.</td>
<td>Joe Biden’s open border is killing Ohioans, with more illegal drugs and more Democrat voters pouring into this country.</td>
</tr>
<tr>
<td>This is personal to me.</td>
<td>This issue is personal.</td>
</tr>
<tr>
<td>No kid should have to grow up without a mother.</td>
<td>No child should grow up an orphan.</td>
</tr>
</tbody>
</table>

42. Indeed, just three days after Protect Ohio Values’ February 17, 2022, post suggested that Vance tell voters “As your senator, I will declare the drug cartels terrorist organizations,”61

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57 Id.
60 Vance Committee Ad, supra.
Vance stated in a February 20, 2022, televised interview and Twitter post from his official campaign account, “We need to declare the Mexican drug cartels terrorist organizations.”  

43. Just ten days after the Vance Committee began airing its immigration-focused ad using much of the same language Protect Ohio Values had proposed, Trump endorsed Vance on April 15, 2022, fulfilling the goal Protect Ohio Values had set out in its February 17 post.  

44. There is reason to believe the materials that Protect Ohio Values provided were things “of value” accepted by the Vance Committee. A review of Protect Ohio’s disbursements — excluding its independent expenditures supporting Vance’s candidacy — during the 2022 election cycle shows that the hybrid PAC spent more than $620,000 on “data management,” $750,000 for polling, and $600,000 on various “consulting” fees, including strategic, communications, and digital consulting.  

45. While a large share of those costs could be attributed to the development and dissemination of the hybrid PAC’s own communications — i.e., over $7.5 million in independent expenditures exclusively supporting Vance’s candidacy — the polling, voter targeting data, strategic insights, and communications materials posted on the Protect Ohio Values website indicate that a substantial proportion of the hybrid PAC’s disbursements for research, polling, and consulting fees paid for materials that were provided to, and thus resulted in prohibited in-kind contributions to, the Vance Committee.

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63 Maggie Haberman and Jazmine Ulloa, Trump Endorses J.D. Vance in Republican Primary for Senate in Ohio, N.Y. TIMES (Apr. 15, 2022), https://www.nytimes.com/2022/04/15/us/politics/ohio-jd-vance-trump-endorsement.html (“Mr. Trump . . . is said to see Mr. Vance as a reliable ally in the Senate on issues he cares about, like trade and immigration.”).

46. As discussed above, the Protect Ohio Values website was not readily accessible to the public. The available facts provide reason to believe the site was an intentionally concealed delivery mechanism for Protect Ohio Values to provide campaign deliverables to the Vance Committee. Prior to May 3, 2022, when Politico publicized its existence, the website would not have appeared as a search result even if someone specifically searched for it on Google — with particular phrases like “JD Vance,” “Protect Ohio Values” or “POV,” and “medium.com.” There is thus reason to believe the site was intended to be found only by someone who not only knew it existed, but also knew exactly where to find it.

47. Politico’s reporting confirms that Protect Ohio Values intended for the materials it posted on the Medium website to remain hidden from the public. According to Politico, when a 98-slide PowerPoint presentation produced by Protect Ohio Values’s polling consultant was accessed by people outside the Vance Committee, “the hunt was on for the leaker,” including efforts by Protect Ohio Values’s Executive Director, along with the committee’s data analytics vendors, “to determine if someone might have accessed the document from the Medium platform by examining the server’s logs.”

48. These actions are inconsistent with any notion that this PowerPoint presentation, as well as the other materials posted on the Protect Ohio Values website, were intended for general public consumption, and instead provide reason to believe the website materials were specifically intended for the Vance Committee’s exclusive use.

49. The available facts, viewed as a whole, provide reason to believe that Protect Ohio Values made in-kind contributions to the Vance Committee, including the amounts that it spent on the research and data that it provided to the Vance Committee via Protect Ohio Values’

65 Isenstadt, Politico Article, supra.
Medium website. Because those contributions were made by an IEOPC or the segregated noncontribution account of a hybrid PAC, they were prohibited under FECA. Moreover, because those contributions appear to have exceeded the applicable contribution limits, they also violated FECA’s contribution amount limits.

50. In addition, neither Protect Ohio Values nor the Vance Committee ever reported the in-kind contributions in their disclosure reports filed with the Commission, as required by FECA. Accordingly, both committees violated FECA’s reporting requirements and thereby denied complainants Campaign Legal Center and Roger Wieand of information regarding the “actual amounts of various expenditures that were in-kind contributions,” which is “information [that] would help . . . evaluate candidates for public office.”

51. The available facts, including the Vance Committee’s use of these materials in preparing its campaign communications, also provide reason to believe that the Vance Committee knowingly accepted, and failed to report, these prohibited in-kind contributions.

52. Accordingly, there is reason to believe that Protect Ohio Values violated 52 U.S.C. §§ 30104(b), 30116(a), and 30118(a), and that the Vance Committee violated 52 U.S.C. §§ 30104(b), 30116(f), and 30118(a).

68 52 U.S.C. § 30104(b); see 11 C.F.R. § 104.13.
53. Wherefore, the Commission should find reason to believe that Protect Ohio Values and the
Vance Committee violated 52 U.S.C. § 30101, et seq., and should conduct an immediate

54. The Commission should seek appropriate sanctions for any and all violations, including
civil penalties sufficient to deter future violations and an injunction prohibiting the
respondents from any and all violations in the future, and should seek such additional
remedies as are necessary and appropriate to ensure compliance with the FECA.

Respectfully submitted,

/s/ Saurav Ghosh
Campaign Legal Center, by
Saurav Ghosh, Esq.
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Washington, DC 20005
(202) 736-2200

/s/ Tiffany Muller
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Saurav Ghosh, Esq.
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Washington, DC 20005
Counsel to the Campaign Legal Center,
Roger G. Wieand

June 6, 2022
VERIFICATION

The complainants listed below hereby verify that the statements made in the attached Complaint are, upon their information and belief, true.


For Complainant Roger G. Wieand

[Signature]

Roger G. Wieand

Sworn to and subscribed before me this 6th day of June 2022.

[Signature]

Notary Public
VERIFICATION

The complainants listed below hereby verify that the statements made in the attached Complaint are, upon their information and belief, true.


For Complainant Campaign Legal Center

Saurav Ghosh, Esq.

Sworn to and subscribed before me this 6 day of June 2022.

Notary Public
VERIFICATION

The complainants listed below hereby verify that the statements made in the attached Complaint are, upon their information and belief, true.


For Complainant End Citizens United

[Signature]

Tiffany Muller

Sworn to and subscribed before me this 6th day of June 2022.

MARK ANDREWS
NOTARY PUBLIC DISTRICT OF COLUMBIA
My Commission Expires July 14, 2024

Notary Public
EXHIBIT A
Breaking New Ground

How POV is Changing the Super PAC Game

POV

A number of people have asked what POV is doing to break from the same-old, same-old approach of traditional Super PACs. After all, we received the largest single primary election contribution in campaign history. It was an opportunity to do new things and break new ground.

With that in mind, we’re publishing an updated version of a memo we sent to key supporters.

***

JD Vance is a unique candidate. He has a compelling biography, of course. But for a first-time candidate, he also has world-class communication skills, a clear political vision that he can articulate persuasively, and broad media interest both among hostile mainstream and generally supportive conservative outlets.

At the same time, like any new candidate, JD entered the race having little name-id with the primary electorate writ large, no staff, and wanting a broad donor network. At Protect Ohio Values (POV), we have worked to amplify JD’s unique strengths while lightening the challenges he faces as a rookie candidate.

As a result, in addition to fulfilling traditional Super PAC roles, POV has broken new ground. This memo outlines some of the novel roles played by POV.

**Supporting the Launch**

When JD was investigating whether he wanted to run for office, POV began
to build out a campaign-in-waiting. JD created an exploratory committee called the Ohio Values Project, which paid for a staffer and allowed him to travel, speak with potential donors, and make an informed choice about running.

Operating independently, POV recruited, vetted, and hired staff who later joined JD as his candidacy approached. This helped his campaign save resources and get off to a quick start.

Before JD’s July 1 announcement, we at POV sent crews to shoot b-roll of Middletown, to follow JD around several events in the Cincinnati area, and ultimately to cut together two videos.

One June 30, a day before JD’s announcement, we released a hype video called “Fighting for Us”, which we gave to FOX News as an exclusive. The video rapidly attracted over 75,000 views.

We had two film crews in place for JD’s announcement rally. Overnight we combined our footage from the event with earlier material to create a launch video, which we called “Shake the System Up”, and which we released the morning of July 2.
“Shake the System Up” has been viewed over a million times on YouTube.

By handling the creation, distribution, and promotion of the hype and launch videos for JD, we allowed the nascent campaign apparatus to focus on his launch event and fundraising.
Finally, in the month leading up to JD’s launch, we began a large-scale small-dollar donor recruitment effort. Based on JD’s message and skills as a communicator, we believed that we could nationalize the primary race. This would allow us to recruit a large cadre of small dollar supporters for his candidacy using Super PAC resources — something no organization has done successfully in a primary before.

Initially, we worked to recruit an email list of prospective supporters. Once JD announced, we pushed these people to become donors while simultaneously taking on board increasingly aggressive prospecting responsibilities. Just based on our own metrics, JD will finish his first quarter as a candidate with several thousand grassroots donors, a genuinely unprecedented feat in a contested primary. These donors will help to close the gap with the other candidates in the race.
So long as we continue to hit our benchmarks, we will continue the small dollar program through the primary.

**Shaping the Landscape**

Shortly before JD’s announcement, POV launched “Ohio War Room” — a Twitter account devoted to promoting positive coverage of JD to conservative media outlets and influencers, and to promoting original videos that highlight aspects of JD’s message and candidacy.

Every time JD is on television, Ohio War Room clips his appearance and tweets out a high-resolution video for his supporters to embed or use. Ohio War Room also produces original videos that amplify JD’s message, dramatize some of his most effective moments, and make fun of the hysterical reaction to his candidacy in the mainstream media.

Clipped videos reliably draw thousands and tens of thousands of views. Our original content does even better. Ohio War Room’s most recent video, “Reward Their Friends”, has been watched more than 220,000 times.

“Reward Their Friends”
POV also supports the campaign in less conspicuous ways. Because JD is his own best messenger, we work to grow attendance at his events. Every time JD’s campaign posts an event announcement, POV sends two rounds of texts and robocalls to likely primary voters in the area letting them know when and where the event is taking place.

POV has also hosted JD for a series of statewide tele-townhalls. We robocall and text tens of thousands of Ohioans before each event and several thousand have attended. These provide a casual and conversational environment for JD to address citizen concerns head-on in a Q&A setting. POV collects, aggregates, and tracks the data from each tele-townhall.

Lastly, we aggressively track digital spending in the state, and have several supporters across Ohio who notify us of direct mail flights. We have been able to counteract spending by the Club for Growth, among others, attempting to smear JD as a RINO and a NeverTrumper.
We have built a custom website that sets the record straight about JD's views of Trump. We have also spent to dominate search results for terms connected to Trump and Vance. Anybody in the Buckeye state who turns to Google to learn about JD and Trump is served our website as the first result. We will continue playing digital defense against this charge for the duration of the campaign.

Research Support

In April, we hired pollster Tony Fabrizio and the industry-leading opposition researchers at Prospect Strategic. Our researchers compiled extensive dossiers on JD and his opponents. Tony then conducted a series of four polls, from April to August, to inform our thinking about the race. We tested a set of policy positions and messages based on JD's public statements, JD's vulnerabilities, and the vulnerabilities of our leading opponents.

Using these insights, we hired the data science company DeepRoot to build a series of models and segments around different issue concerns and
messages. The campaign is also hiring DeepRoot to provide data services. The campaign will therefore be able to access the modeled universes POV has created, and POV will be able to access voter contact data uploaded into the database by the campaign. This arrangement allows POV to bring presidential-level targeting sophistication to JD's campaign without expecting the campaign to shoulder the cost of audience construction.

Substantively, our polling and modeling have separately found that JD has a clear path to victory, that his message and biography fit that trajectory well, and that he's making good progress along the way while his opponents stall or slide.

Fabrizio has polled Ohio Republican primary voters for POV four times. In April, we tested a range of issues that we expected JD to run on should he choose to become a candidate, along with several positive attributes of JD's biography. In June we tested JD's vulnerabilities shortly before his announcement. In July we tested Timken's vulnerabilities and in August we tested Mandel's.

Across these four polls, we find JD rising, Timken collapsing, and Mandel sliding on the ballot. At the same time, a large group of voters remain undecided.

<table>
<thead>
<tr>
<th></th>
<th>Apr</th>
<th>Jun</th>
<th>Jul</th>
<th>Aug</th>
</tr>
</thead>
<tbody>
<tr>
<td>Josh Mandel</td>
<td>25</td>
<td>22</td>
<td>21</td>
<td>19</td>
</tr>
<tr>
<td>J.D. Vance</td>
<td>6</td>
<td>4</td>
<td>12</td>
<td>13</td>
</tr>
<tr>
<td>Mike Turner</td>
<td>7</td>
<td>6</td>
<td>7</td>
<td>5</td>
</tr>
<tr>
<td>Jane Timken</td>
<td>8</td>
<td>8</td>
<td>7</td>
<td>5</td>
</tr>
<tr>
<td>Mike Gibbons</td>
<td>2</td>
<td>2</td>
<td>2</td>
<td>4</td>
</tr>
<tr>
<td>Matt Dolan</td>
<td>n/a</td>
<td>2</td>
<td>1</td>
<td>2</td>
</tr>
<tr>
<td>Bernie Moreno</td>
<td>2</td>
<td>1</td>
<td>2</td>
<td>1</td>
</tr>
<tr>
<td>Undecided</td>
<td>51</td>
<td>55</td>
<td>48</td>
<td>51</td>
</tr>
</tbody>
</table>

Initial Ballot Over Time

We have also seen JD's favorable ratings grow steadily along with awareness
of his candidacy. Most importantly, his Very Favorable rating is growing the fastest.

Vance vs Mandel Fav/Unfav

As a corollary, even though JD is still running behind Mandel in terms of name recognition, he is rapidly closing in on Mandel's consideration score.

Consideration Over Time

Much the same can be said of JD's ideological positioning in the electorate. As the primary continues, he has come to be seen as considerably more conservative. Mandel, for all his antics, is essentially unchanged.
Ideological Positioning Over Time

Finally, our polling indicates that JD has a lot of room to grow. As mentioned, we tested several positive attributes and messages in April, when JD was unknown. He immediately jumped to more than a third of the vote and a commanding lead, with Mandel’s ballot support cut in half.

Informed Ballot: JD Positives

In August we tested negative attributes and messages about Mandel. Mandel’s support fell to nearly an identical level as the April informed ballot survey and JD takes the lead. Interestingly, Timken saw no change in her position. All this is to say that, if we have the resources to put JD and his message in front of voters, he will win.

Data Infrastructure

Moving from the bigger picture to tactical questions, our modeling helped us identify who in the primary electorate needs to hear what. In June, before JD’s announcement, we identified several key segments of the electorate.
We found that JD indexed well with comparatively affluent GOP primary voters, especially college-educated suburbanites — a difficult group to reach with traditional media buying.

These initial supporters, plus a cohort of demographically similar voters, were the shortest path to viability. We focused our initial efforts on getting JD’s announcement video in front of them.
June: Best Targets

Crucially, a large segment of the population remained fully undecided on the ballot. This group clustered in southeastern Ohio because we included Congressman Turner in our modeling survey. Excluding him, the entirety of southern Ohio is full of voters up for grabs. JD is the only non-Cleveland candidate, with a biography and message well-matched to the stretch of counties running from Mahoning County, down the West Virginia border, and across the state south of Columbus.

June: Undecided Ballot

These undecided voters are older, less likely to be married, have lower incomes, and lower rates of college graduation. They consume traditional media, especially broadcast and cable television.
June: Undecided Voter Audience Profile

We found that the messages we tested based on JD’s public statements matched well with the policy priorities of these undecided voters. This group is hungry for a conservative outsider who is tough on immigration, willing to tax companies that outsource jobs, and reign in the Biden administration’s inflation-causing spending spree. JD fits the bill to a tee.
Winning over these undecided voters, while retaining JD’s strong suburbanite support, would reassemble the Trump coalition in miniature, which carried Ohio twice. It would certainly put JD over the percentage needed to win the nomination.

And JD appears to be well on his way. JD has dominated earned media in the state since his July 1 announcement, carrying the lion’s share in every market and across both broadcast and cable.
Targeted Rating Points and Earned Media Metrics, July 1 to Present

His 2,838 television appearances swamp Mandel's 397 and Timken's 226. Indexed to the GOP primary electorate, we estimate JD has earned more than 350 targeted rating points in every market in the state, with 539 in Columbus, 527 in Cleveland, and 483 in Cincinnati. He dominates the secondary markets, where cable is king.

When we refreshed the models earlier this month, we found across-the-board improvement for JD. He continued to consolidate the suburbanite vote and, based solely off earned media, has begun to build support among the previously undecided bloc in southern and far-eastern Ohio.
Vance Growth with Key Segments, June to September

Tripling his vote share among white working-class men in particular shows immense promise. At the same time, he’s growing fastest among the most reliable GOP voters, who make up the lion’s share of the primary electorate and who are the most likely to vote.

Geographically, we see steady and nearly uniform ballot position across the state. This despite having spent nothing on television advertising so far.
Indeed, we saw positive change for JD among every key demographic in the GOP primary. While that in and of itself is not terribly surprising — he was not a declared candidate when we conducted our first round — he is nonetheless growing across the party, and is growing fastest with the largest groups.

As a result, in the second round of modeling, we find JD’s prospective support audience broadening demographically and ballooning proportionally to 22% — the same percentage as Mandel. Clearly, JD has a straightforward path to consolidating support outside of Cleveland and Columbus. Once Turner publicly foregoes a Senate run, that path will broaden still further as JD consolidates support in and around Dayton.
These results contrast favorably to both Mandel and Timken. Mandel has stalled out, and in many places taken a small step back. While he still enjoys meaningful advantages in name-ID and on the ballot, the breadth of his support is narrowing and concentrating in eastern Ohio. Indeed, his modeled universe of likely supporters is now smaller than JD's.
Worse, still, for Josh is he's seeing decay among the highest-propensity GOP primary voters, who are more likely to make their minds up early and thus may be a leading indicator. Josh’s history as State Treasurer will do little to endear him to blue collar voters in the southeast and east of the state. His dependence on them for his current ballot position is an ominous sign for his campaign. As with his earlier support levels in western Ohio, Josh is known but unloved, and voters will clearly move away from him if given an alternative.

Mandel Stagnation Among GOP Segments, June to September

<table>
<thead>
<tr>
<th>Field Name</th>
<th>Grouping</th>
<th>Count</th>
<th>Percent</th>
<th>R2-R1</th>
<th>Round 2 9/14/21</th>
<th>Round 1 5/24/21</th>
</tr>
</thead>
<tbody>
<tr>
<td>Republican Party Framework</td>
<td>Strong Republicans</td>
<td>1,600,440</td>
<td>78%</td>
<td>-1%</td>
<td>29%</td>
<td>30%</td>
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<tr>
<td></td>
<td>Steady Republicans</td>
<td>147,895</td>
<td>7%</td>
<td>-1%</td>
<td>21%</td>
<td>22%</td>
</tr>
<tr>
<td></td>
<td>Volatile Republicans</td>
<td>171,159</td>
<td>8%</td>
<td>-2%</td>
<td>20%</td>
<td>22%</td>
</tr>
<tr>
<td></td>
<td>Volatile Independents</td>
<td>128,341</td>
<td>6%</td>
<td>-1%</td>
<td>20%</td>
<td>21%</td>
</tr>
</tbody>
</table>

Mandel Decay via Vote Likelihood, June to September

<table>
<thead>
<tr>
<th>Field Name</th>
<th>Grouping</th>
<th>Count</th>
<th>Percent</th>
<th>R2-R1</th>
<th>Round 2 9/14/21</th>
<th>Round 1 5/24/21</th>
</tr>
</thead>
<tbody>
<tr>
<td>Turnout Propensity</td>
<td>High</td>
<td>131,746</td>
<td>6%</td>
<td>-6%</td>
<td>29%</td>
<td>35%</td>
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<tr>
<td></td>
<td>Mid</td>
<td>1,477,105</td>
<td>72%</td>
<td>-2%</td>
<td>28%</td>
<td>30%</td>
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<tr>
<td></td>
<td>Low</td>
<td>438,894</td>
<td>21%</td>
<td>0%</td>
<td>23%</td>
<td>23%</td>
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</table>

Mandel Change by DMA, June to September

<table>
<thead>
<tr>
<th>Field Name</th>
<th>Grouping</th>
<th>Count</th>
<th>Percent</th>
<th>R2-R1</th>
<th>Round 2 9/14/21</th>
<th>Round 1 5/24/21</th>
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<tr>
<td>DMA</td>
<td>CHARLESTON-HUNTINGTON</td>
<td>53,849</td>
<td>3%</td>
<td>12%</td>
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<td></td>
<td>CINCINNATI</td>
<td>360,533</td>
<td>18%</td>
<td>-1%</td>
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<td>28%</td>
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<tr>
<td></td>
<td>CLEVELAND-AKRON (CANTON)</td>
<td>580,391</td>
<td>28%</td>
<td>-4%</td>
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<td>33%</td>
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<td></td>
<td>COLUMBUS, OH</td>
<td>419,312</td>
<td>20%</td>
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<td>26%</td>
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<td></td>
<td>DAYTON</td>
<td>262,173</td>
<td>13%</td>
<td>-1%</td>
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<td>20%</td>
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<td></td>
<td>LIMA</td>
<td>49,565</td>
<td>2%</td>
<td>-6%</td>
<td>28%</td>
<td>34%</td>
</tr>
<tr>
<td></td>
<td>TOLEDO</td>
<td>171,336</td>
<td>8%</td>
<td>-3%</td>
<td>30%</td>
<td>33%</td>
</tr>
<tr>
<td></td>
<td>WHEELING-STEUBENVILLE</td>
<td>30,109</td>
<td>1%</td>
<td>7%</td>
<td>31%</td>
<td>24%</td>
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<tr>
<td></td>
<td>YOUNGSTOWN</td>
<td>74,523</td>
<td>4%</td>
<td>6%</td>
<td>33%</td>
<td>27%</td>
</tr>
</tbody>
</table>

JD’s unique message about taxing companies that ship our jobs overseas appears to be especially powerful with these cohorts.
Support for Taxing Outsourcers

That may in part be why we’re beginning to see early movement towards JD concentrated in the southern and western portions of the state.

Movement to Vance: June to September

Timken, by contrast to both Mandel and JD, appears to be in free-fall,
especially in Cincinnati and Columbus. The prospects for her candidacy are grim.

Importantly, Jane’s voters are leaving her in places where we are either uniquely strong geographically, like Cincinnati, or where no candidate has established a regional foothold, like Columbus.
Looking Ahead

As the above makes clear, JD is on a trajectory to win. He has the right message for the primary. His opponents are treading water or sinking. Mandel especially has major vulnerabilities that we have identified and can exploit to let voters know that he is not the America First champion he purports to be.

The momentum is on our side. We have a clear path to victory.
However, we will need resources to put JD in front of voters. His opponents already attack him daily on social media. The campaign and Super PAC have been disciplined and have refused to take the bait. However, we will need to go on offense as 2021 becomes 2022.

POV is already putting together the materials we need to make JD the next United States Senator from Ohio. But we are facing a two-time statewide elected official with a massive campaign war chest, and four self-funders who can commit millions of their own dollars. We have the path, we have the plan, and we have a uniquely talented candidate with a message that matches the moment. We simply need to secure the resources necessary to win.
As we get into the high season, we’re seeing pieces on the board, many that have been sitting on the sideline, come into play. Portman has endorsed Timken. Dolan’s extended family is pouring millions into a Super PAC. We here at POV have gone up on the air.

Everyone is looking earnestly to see what President Trump will do. To the greatest extent possible, the campaigns are working hard to improve their standing in Mar-a-Lago without running out of steam before early voting begins in April.

We’ve seen the limits of spending alone: Gibbons and Timken have paid dearly for middling and, at least in the case of Timken ephemeral, ballot share. Any candidate hoping to break out of this morass needs to stand out
from the field. To win a Trump endorsement, a candidate has to show growing ballot share. To get that, a candidate has to own a critical issue.

JD can do that. Indeed, voters are eager and ready for him to do precisely that.

Washington politicians are furthest from the opinions of Republican primary voters, and even swing voting Americans, on the question of immigration. For decades Republican voters have demanded we create a merit based immigration system, reduce numbers, and fix our broken borders.

Instead, too many Republican leaders have rewarded big business with cheap labor while Democrats simply ignore the worst border crisis in half a century. Caught out in this disconnect, most GOP candidates just fall back on talking points cribbed directly from Trump speeches. It rings false. They move their libs, they utter the words, but they don’t speak from a place of conviction.

Open borders have a real impact on people in Ohio. A broken border means the drug cartels can freely ship fentanyl into our streets and prey upon working-class communities like the one where JD grew up. They kill thousands of Ohioans every year.

JD can personalize our broken border. He has unique credibility on the issue. He has a compelling personal story about drugs and addiction. That story is far too common due to the drugs and crime that flow across the southern border. He can connect that story to deindustrialization and the decline of the family. As a result, when he commits to being strong on borders, immigration, and crime, people will believe him.

But he also needs to be concrete. He needs to give people issues and promises — clear, direct, and credible — that take his personal credibility and translate it into policy, and which help voters see him as a senator.
Voters want to hear JD say “As your senator, I will sponsor a bill to declare the Mexican Drug Cartels international terrorist organizations. The same military that took out Osama Bin Laden will take out the drug lords.”

They want to hear him say “I will vote to fully fund the border wall. And I will fine big businesses that replace Americans with cheap foreign labor.”

They need to have somebody say to them “We should not be giving money to countries that ship us criminals and, when we deport them, refuse to take them back.”

They will believe it when he says “This is my commitment to the people of Ohio. Because if we don’t have a border, we don’t have a country. Every state is a border state.”

The campaign is uniquely positioned to help JD deliver this message by connecting it to his personal story. We hope they do. We would love to shoot a direct to camera ad with JD saying something like

*I was raised by my grandparents because my mother got addicted to opioids.*

*Today, fentanyl pours over our border, poisoning our people. Joe Biden doesn’t care. Career politicians in both parties just talk.*

*Enough is enough. As your senator, I will declare the drug cartels terrorist organizations. Any country that refuses to accept deported illegals will lose its foreign aid.*

*This is personal to me. I’m JD Vance and I approve this message because no kid should have to grow up without a mother.*

But we’re the Super PAC, so we can’t do that.

We can chop together bits of JD’s speeches, and emphasize his important
policy commitments. When he makes a clear, crisp, declarative statement of what he will do as a senator, we’re well positioned to take the footage and audio and run with it.

We’re especially well positioned to cover advertising on broadcast. Right now candidates are enjoying considerable economies on cable, especially FOX News. Again, if we could do a direct to camera ad like the one above, we would spend the money and put it on cable starting at the end of this month at a steady $80k per week burn at the candidate rates. But we don’t have the ability to make such an ad. So instead, we’re trying to make the most compelling set of issue-focused ads that help define JD as a conservative and a prospective senator.

We’re satisfied with our first ad. It hits the central theme of the race on which JD is running: a corrupt oligarchy has plundered the country via outsourcing and mass immigration, and used identity politics to divide and distract from the plundering. Message delivered.

Now we have to translate that into issue commitments on immigration and trade. We have an ad made that features some of JD’s endorsers prominently, but the reality is that he doesn’t have a full slate with high quality video footage. The Tucker endorsement is great, and the MTG endorsement video from Bannon’s show is solid. Kirk doesn’t enjoy the name recognition of MTG, let alone Tucker. We don’t have Hawley on camera making an endorsement.

So we’re inclined to focus on identifying issues. We have an excellent spot cut featuring an angel mom. We’re inclined to run that next to move immigration front and center and make it the featured issue in the debate.
EXHIBIT C
Protect Ohio Values

Mar 15, 2021 — Protect Ohio Values ... Paid for by Protect Ohio Values PAC, ProtectOhioValues.com. Not authorized by any candidate or candidate's committee.

https://protectohiovalues.com

JD Vance pollster issues warning on Ohio Senate race - Politico
Feb 7, 2022 — A 98-page PowerPoint presentation produced by Tony Fabrizio, who has been polling for the pro-Vance Protect Ohio Values super PAC since last year, paints a...

https://www.politico.com/news/2022/02/07/jd-vance-

Vance parleys Trump endorsement into new Thiel money
Apr 19, 2022 — Thiel has donated $3.5 million to Protect Ohio Values, the super PAC backing Vance, according to a person familiar with the contribution — part of a broader...

https://www.politico.com/news/2022/04/19

Ohio War Room (@OhioWarRoom) / Twitter
Jun 28, 2021 — Keeping eyes on #OHSen. A project of Protect Ohio Values PAC supporting @JDVance1 for Senate.

https://twitter.com/ohiowarroom

Ohio's Republican Senate primary attracts big money as ...
Apr 22, 2022 — Protect Ohio Values already spent over $12.3 million this election cycle. After Thiel's latest donation, the pro-Vance PAC paid vendors almost $2.2 million, ...

https://www.opensecrets.org/news/2022/02/peter-t

Two of the GOP’s most powerful forces are facing off in Ohio
Feb 8, 2022 — On Monday, Politico reported on new polling conducted by the firm Fabrizio, Lee & Associates for Protect Ohio Values, the super PAC into which Thiel poured ...

https://www.axios.comPolitics

Ohio's Senate race is flooded with campaign cash - Axios
Apr 21, 2022 — The big picture: Ohio's Senate primary is among the most expensive campaigns in the 2022 election cycle. Zoom in: The Protect Ohio Values PAC supporting J.D ...

https://thehill.com/news/campaign

Thiel donates $3.5M to pro-Vance super PAC after Trump's ...
Apr 20, 2022 — Thiel's donation to Protect Ohio Values, first reported by Politico and confirmed to The Hill by a source familiar with the matter, comes amid a mad... Missing: medium. | Must include: medium.

https://www.washingtontimes.comnews/apr/jd-va-

JD Vance gets Trump bounce in Ohio Senate race: poll
Apr 21, 2022 — That's according to a statewide survey conducted by the pro-Vance Protect
Ohio Senate race: GOP spending hits $66 million ahead of ...
May 2, 2022 — But Vance got a significant boost from a super PAC bankrolled by PayPal co-founder Peter Thiel. That group, dubbed Protect Ohio Values, has spent $9.8 million ...

Peter Thiel is making the biggest political bet of his life - Vox
Mar 15, 2021 — The contribution was made last Friday to Protect Ohio Values, a super PAC formed last month to support a possible Vance bid, a group spokesman confirmed to ...

The Decline of Ohio and the Rise of JD Vance - The New York ...
Apr 29, 2022 — The media calls us racist for wanting to build Trump's wall. ... million in campaign contributions to Protect Ohio Values, a super PAC backing Mr. Vance.

What to watch in Tuesday's primaries in Ohio and Indiana
May 2, 2022 — ... credentials and commitment to Trump in television ads and other media, ... April 25 supporting him, Protect Ohio Values, was mainly funded by Thiel, ...

As Trump Makes Peace With J.D. Vance Here's What Ohio ...
Apr 24, 2022 — But Trump's backing has led to a surge in support, according to recent polling conducted on behalf of Protect Ohio Values, a super PAC supporting Vance, ...

Thanks to self-funders seeking rare open seat, Ohio's ...
Oct 25, 2021 — The PAC also sent a film crew to record Vance at a Republican Senate candidate forum in Versailles earlier this month. Protect Ohio Values paid about $562,800 ...

Not everyone's convinced Trump's nod to J.D. Vance in Ohio's ...
Apr 26, 2022 — But if the post-endorsement poll documents the zenith of Vance's run for Senate so far, its nadir likely was captured by another Protect Ohio Values ...

Peter Thiel's Huge Donation Backing J.D. Vance Could Upend ...
Mar 15, 2021 — While the average amount spent by winning Senate candidates has crept up over the ... went to a super-PAC formed last month called Protect Ohio Values, ...

J.D. Vance on Trump, Israel and his chosen faith - Jewish Insider
Sep 9, 2021 — Peter Thiel, the billionaire venture capitalist, pumped $10 million into a pro-Vance super PAC, Protect Ohio Values, in March.

J.D. Vance Launches Contradiction-Filled Campaign in Ohio
Jul 2, 2021 — At the time, Fitzmartin reportedly worked for one of the lobbyists also indicted in the scandal. Protect Ohio Values did not reply to The Daily Beast's
Super PAC spending $1.4 million to reintroduce J.D. Vance to Ohio's political scene

Feb 14, 2022 — Republican operative Luke Thompson, who works for "Protect Ohio Values," tells Fox News that the new ad buy "is just the beginning" ahead of Ohio's May 3 primary. Thompson is a "political consultant" who "helped with the 'Hillbilly Elegy' campaign." The new ad buy, "is just the beginning," he says. Missing: medium.

Peter Thiel - Ballotpedia

Apr 15, 2021 — Masters was the chief operating officer of Thiel Capital and president of Thiel Foundation. Thiel also donated another $10 million to Protect Ohio Values, a super PAC supporting Vance.

Competitive, chaotic Ohio GOP Senate primary is just three days away

Feb 4, 2022 — (Moreno, however, dropped out of the race Thursday.) Then there's the outside spending. Protect Ohio Values, funded by billionaire Peter Thiel, is backing "Hillbilly Elegy" author J.D. Vance.

Mike Gibbons signs Ohio Gun Owners survey committing to 2nd Amendment

Apr 22, 2022 — Gibbons has been targeted in two recent attack ads - one from Jane Timken, a PAC backing incumbent Sen. Rob Portman, and another from Protect Ohio Values. Gibbons has also self-funded ads, which he says are "legal, appropriate." Gibbons is a multimillionaire who ran for governor in 2018.

'Bhillbilly Elegy' author J.D. Vance gets $10 million boost from Peter Thiel's PAC

Mar 15, 2021 — Bryan Lanza, the communications adviser for the Protect Ohio Values super PAC, confirmed the Thiel donation and said members of the Mercer family also had pledged funds.

Bolstered by millions in self-funded ads, Mike Gibbons is "in it to win it"

Mar 8, 2022 — Gibbons has been targeted in two recent attack ads - one from Jane Timken, a PAC backing incumbent Sen. Rob Portman, and another from Protect Ohio Values.
Trump’s Oz, Vance endorsements bring cash windfall, backlash
Apr 22, 2022 — Protect Ohio Values, the super PAC supporting Vance, said it had brought in $5 million since Trump's endorsement, including a $3.5 million check from ...

Report: Vance “Vulnerable” To His Own “Elite” Criticism
Jul 2, 2021 — ... the meeting: Megan Fitzmartin, who according to a fundraising email now serves as political director of Protect Ohio Values, a super PAC backing Vance.

Peter Thiel donates $10m to PAC supporting Hillbilly Elegy's ...
Mar 16, 2021 — Peter Thiel (right) made the hefty donation to Protect Ohio Values, which is a PAC formed last month to back JD Vance’s (left) potential run for retiring ...

Is JD Vance about to make Trumpism acceptable? - British GQ
Aug 23, 2021 — And Peter Thiel, the Silicon Valley billionaire, has given $10 million to Protect Ohio Values, the political action committee that is supporting Vance’s ...

New Ohio Senate Poll Shows More Bad News For JD Vance
Feb 11, 2022 — The two other candidates who have received major media attention, ... Tony Fabrizio, a pollster who has been working for the pro-Vance Protect Ohio Values ...

Billionaire Thiel Pumps $3.5M More Into Pro-Vance PAC
Apr 19, 2022 — Thiel, a longtime Trump supporter, has donated $3.5 million to Protect Ohio Values, a super PAC that is backing Vance, a source told Politico Tuesday.

Trump's bid to shape GOP faces test with voters in May races
May 2, 2022 — The pro-Vance super PAC known as Protect Ohio Values, meanwhile, has spent $10 million on the primary so far, including a recent barrage of attack ads ...

JD Vance Lead -- in Ohio in Poll From His Super PAC - Mediaite
Apr 28, 2022 — did not note in his tweet that the Protect Ohio Values PAC, which has endorsed Vance in the race and is largely funded by Peter Thiel, commissioned the poll.

Peter Thiel donated to group backing J.D. Vance for Senate
Mar 15, 2021 — Brian Lanza, a spokesman for the pro-Vance PAC Protect Ohio Values, told the local publication that members of the Mercer family, which is influential in ...
Billionaire Thiel pumps $10M into super PAC backing likely Ohio Values

Mar 15, 2021 — A spokesman for the super PAC Protect Ohio Values confirmed Thiel's contribution, as well as a "significant" donation from the conservative mega donor Thiel.

The conversion of JD Vance - UnHerd

Apr 26, 2022 — Luke Thompson, the executive director of Protect Ohio Values, says that it's possible to overstate how far Vance has travelled politically. "He used to think ..."

Billionaires Bet Big to Influence 2022 Elections

Feb 22, 2022 — Thiel donated another $10 million to Protect Ohio Values, a single-candidate super PAC supporting Hillbilly Elegy author and venture capitalist J.D. Vance, ...

Ohio Polls Show GOP Senate Primary Shakeup Two Months ...

Mar 1, 2022 — The Fabrizio, Lee & Associates poll, per a memo from pollsters David Lee and Travis Tunis to the Protect Ohio Values PAC folks obtained by Breitbart News, ...

Trump's Oz, Vance endorsements bring cash windfall, backlash

Apr 24, 2022 — Protect Ohio Values, the super PAC supporting Vance, says it has brought in $5 million since Trump's endorsement. That includes a $3.5 million check from ...

U.S. Senate Republican Primary Debate - WLWT

Apr 6, 2022 — FOR 20 YEARS, TIM RYAN HAS FAILED TO PROTECT AMERICAN JOBS, TO PROTECT OHIO VALUES AND HE WANTS A PROMOTION. ONLY IN POLITICS NCA YOU F...

Trump's Bid to Shape GOP Faces Test With Voters in May Races

May 2, 2022 — The pro-Vance super PAC known as Protect Ohio Values, meanwhile, has spent $10 million on the primary so far, including a recent barrage of attack ads ...

Ohio US Senate candidate profile: JD Vance

Oct 11, 2021 — ... State political science professor Herb Asher told the media this summer. ... Thiel provided $10 million to Protect Ohio Values, a super PAC launched in ...

GOP hopefuls dole out $23M for Senate - Tribune Chronicle

Apr 17, 2022 — Also, Protect Ohio Values, a super PAC that is backing Vance and isn't coordinating with his campaign, spent $5,436,221 in the first quarter to boost ...

Trump's endorsements of Pa., Ohio candidates bring windfall ...

Apr 23, 2022 — Protect Ohio Values, the super PAC supporting Vance, says it has brought in $5 million since Trump's endorsement. That includes a $3.5 million check from ...
Candidates spend millions trying to win Senate races in ...

Apr 28, 2022 — For his part, Vance has the support of Protect Ohio Values, a super PAC into which Thiel has invested $13.5 million. Ted Cruz stumps in Lehigh Valley for ...

Trump's bid to shape GOP faces test with voters in May races

May 2, 2022 — The pro-Vance super PAC known as Protect Ohio Values, meanwhile, has spent $10 million on the primary so far, including a recent barrage of attack ads ...

Insights offered on endorsement power of Trump, other leaders

Apr 22, 2022 — Vance has had the most outside spending in his favor, all coming from the Protect Ohio Values PAC, bankrolled by venture capitalist and PayPal co-founder Peter ...

Trump's Bid to Shape GOP Faces Test with Voters in May Races

May 2, 2022 — The pro-Vance super PAC known as Protect Ohio Values, meanwhile, has spent $10 million on the primary so far, including a recent barrage of attack ads ...

JD Vance Senate run is test of Trump influence on Republican ...

May 1, 2022 — The pro-Vance group Protect Ohio Values has been propped up by $13.5m in donations from the tech investor Peter Thiel, who reportedly lobbied Trump directly ...

J.D. Vance Might Run for Senate With Nothing But Grit ... - VICE

Apr 15, 2021 — Last month, tech billionaire Peter Thiel—who co-founded PayPal and CIA-backed data firm Palantir—donated $10 million to Protect Ohio Values, a super PAC that is ...

Tech Billionaire Thiel And Mercer Family Back Potential J.D. ...

Mar 15, 2021 — Key Facts. Venture capitalist Thiel, who co-founded PayPal and CIA-backed data firm Palantir, donated $10 million to Protect Ohio Values, a ...

J.D. Vance, Man of the People, Jetted Off to a Hamptons ...

Jul 19, 2021 — ... guests reportedly included heiress Rebekah Mercer, media magnate Steven ... to Protect Ohio Values, a super PAC supporting Vance's Senate candidacy.

JD Vance Receives Ohio Right to Life Support in Senate GOP ...

Apr 9, 2022 — A recent statewide opinion poll conducted by the Pro-Vance Super PAC Protect Ohio Values shows businessman Mike Gibbons, Josh Mandel Ohio's former ...

Millionaire candidates pour cash into Ohio Senate race | News

Apr 29, 2022 — For his part, Vance has the support of Protect Ohio Values, a super PAC into ...

But asked last week if someone as wealthy as he is can understand average ...
Peter Thiel Backs Blake Masters For Possible Senate Run ...
Apr 26, 2021 — Thiel likewise donated $10 million to the super PAC Protect Ohio Values, which is looking to support Vance for public office.

Millionaire candidates pour cash into Ohio, PA senate races
Apr 28, 2022 — For his part, Vance has the support of Protect Ohio Values, a super PAC into which Thiel has invested $13.5 million. In Pennsylvania, the state's seven-way ...

Trump's bid to shape GOP faces test with voters - Times Gazette
May 2, 2022 — The pro-Vance super PAC known as Protect Ohio Values, meanwhile, has spent $10 million on the primary so far, including a recent barrage of attack ads ...

Daily Kos Elections Live Digest: 3/1
Mar 1, 2022 — OH-Sen: J.D. Vance's allies at Protect Ohio Values have released a survey of the May Republican primary from Fabrizio Lee arguing that its recent ad ...

Trump's endorsement of Dr. Oz brings influx of cash and ...
Apr 23, 2022 — Protect Ohio Values, the super PAC supporting Vance, says it has brought in $5 million since Trump's endorsement. That includes a $3.5 million check from ...

Inside The Final Days Of Ohio's MAGA Senate Primary
Apr 23, 2022 — Immediately after the endorsement, Thiel pledged an additional $3.5 million to the Vance-aligned super PAC, Protect Ohio Values. Vance started running for ...

Trump poised to endorse far-right JD Vance for Senate in Ohio
Apr 14, 2022 — The survey, done by GOP pollster David Lee for the pro-Vance super PAC, Protect Ohio Values. All three candidates were at 18 percent.

Trump's endorsements of Oz, Vance bring cash windfall - The ...
Apr 24, 2022 — Protect Ohio Values, the super PAC supporting Vance, said it had brought in $5 million since Trump's endorsement, including a $3.5 million check from ...

Trump endorsement brings surge in campaign cash for Ohio ...
Apr 25, 2022 — In addition, Protect Ohio Values, the super PAC supporting Vance, said it had brought in $5 million since Trump's April 15 endorsement, including a $3.5 ...

Everybody Hates JD Vance - Wonkette
Feb 9, 2022 — Looks like JD Vance might have to write an elegy about his own Senate campaign. Politico reports that the pro-Vance Protect Ohio Values super PAC has ...
Candidatos republicanos ricos buscan dos escaños vitales

Apr 28, 2022 — Por su parte Vance tiene el apoyo de Protect Ohio Values, un super PAC en el que Thiel invirtió 13.5 millones de dólares.

Candidates for US Senate in Ohio make last-minute push - 10TV

May 2, 2022 — Vance has spent $354,000 of his own money but the rest is bankrolled by the Political Action Committee Protect Ohio Values which has spent $5.8 million to ...

Missing: medium. | Must include: medium.

Trump speaks at 'Save America' rally in Ohio - WFLA

Apr 23, 2022 — Protect Ohio Values, the super PAC supporting Vance, says it has brought in $5 million since Trump's endorsement. That includes a $3.5 million check from ...

Wealthy - National Memo

Jul 2, 2021 — In March, in advance of Vance's official campaign declaration, former Paypal executive and billionaire Peter Thiel donated $10 million to Protect Ohio Values, a ...

Republican Midterm Message On “Border Security” is Heavy ...

Mar 24, 2022 — In the Republican primary to fill the Ohio Senate seat of retiring Senator Rob Portman, Protect Ohio Values PAC ran a TV ad focusing solely on this message.

Millionaire candidates pour cash into Ohio, Pa. Senate races

Apr 28, 2022 — COLUMBUS, Ohio (AP) — Millionaire candidates and billionaire investors are harnessing their considerable personal wealth to try to win competitive ...

Palantir Stock: The Recovery Will Be Swift (NYSE:PLTR)

Apr 24, 2022 — Protect Ohio Values, the super PAC supporting Vance, said it had brought in $5 million since Trump's endorsement, including a $3.5 million check from ...

Peter Thiel buys new McMansion for his sock puppet

Apr 20, 2022 — Thiel has donated $3.5 million to Protect Ohio Values, the super PAC backing Vance, according to a person familiar with the contribution — part of a broader ...

Trump speaks at 'Save America' rally in Ohio - Netional Dastak

Apr 24, 2022 — Protect Ohio Values, the super PAC supporting Vance, says it has brought in $5
That includes a $3.5 million check from...
In order to show you the most relevant results, we have omitted some entries very similar to the 96 already displayed.
If you like, you can repeat the search with the omitted results included.
EXHIBIT D
J.D. Vance Won Trump's Blessing, Now He's Cashing In

Apr 23, 2022 — In a Friday filing with the Federal Election Commission, J.D. Vance for Senate ...

the super PAC, called "Protect Ohio Values" (POV PAC), was on fumes.

Examining the Problem of 'Hillbilly Elegy' and Proposing ...

Feb 9, 2021 — In 2016, J.D. Vance's Hillbilly Elegy: A Memoir of a Family and a Culture in Crisis was devoured by an American public desperate to understand the ascension ...

Netflix's 'Hillbilly Elegy' is a lazy caricature, but not the one you

Nov 24, 2020 — The film adaptation of J.D. Vance's requiem for Appalachia misfires in its portrayal of Trump era culture wars. ...

Introduction: Let's Start with Hillbilly Elegy - JStor

by JL Stump · 2018 · Cited by 6 — was recently re- popularized in J. D. Vance's memoir Hillbilly. Elegy. My argument centers on three main points. First, I con- cur that the internal colony ...

JD Vance Holds Line Against Warmongering - The American ...

Mar 22, 2022 — Along these lines, I cheered when I saw J.D. Vance, speaking in an Ohio GOP Senate race debate, stick to his guns in opposing NATO instituting a no-fly zone ...

class, culture, and resentment - USC Dornsife

Mar 23, 2017 — the United States, J. D. Vance's Hillbilly ... To people who cannot blame their pov ... media producers, and other people like me are telling!". 7 pages

What Peter Thiel, JD Vance, and Others Are Learning ...

Apr 20, 2022 — What Peter Thiel, J.D. Vance, and Others Are Learning From Curtis Yarvin and the New ...

Does anyone else think the people in Ohio are stuck up and ... Dec 11, 2021
What is the worst book you've ever read and why? - Reddit Aug 15, 2021
I recently read Hillbilly Elegy by J.D. Vance and highly recommend this book not just for its insights into poverty, but also for what I learned from hearing an opposing viewpoint.

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**Reverse Engineering Empathy - Medium**

Feb 19, 2017 — I recently read Hillbilly Elegy by J.D. Vance and highly recommend this book not just for its insights into poverty, but also for what I learned from hearing an opposing viewpoint.

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**JD Vance for Senate - Support JD Vance for US Senate**

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I'm bringing Ohio values to DC, but I can't do it alone. Donate today to help my campaign. I'm running to put America First Again and stop the Left. Donate to support our campaign.

Support JD Vance · Join JD to Save Ohio
Hillbilly Elegy, the book that best explains Trump's America
Mar 9, 2017 — Hillbilly Elegy by JD Vance is a raw and visceral account of the life of a self-proclaimed hillbilly. It's also an exploration of the community that both ...

Trump lays down marker for Vance in Ohio rally - the news on ...
Apr 24, 2022 — ... dialed up the stakes in Ohio's Senate Republican primary contest, holding a big rally with his endorsed candidate, "Hillbilly Elegy" author J.D. Vance.

REVIEW: 'Hillbilly Elegy' (2020) Has an Underlying Authenticity
Mar 5, 2021 — Hillbilly Elegy, based on the memoir of the same name, follows J.D Vance (Gabriel Basso) as he confronts his ... The POV shots are arresting in their use.

IX Center Getting Rid of Iconic Ferris Wheel | Cleveland News
Jan 26, 2022 — Goose's Rick Mitarotonda on Musical Influences, Longer Jams and the Band's Growth Ahead of Ohio · J.D. Vance, Porn Hunter, is Coming for Your Porn.

Jon Stewart Lines Up Irresistible New Film Project, Starring ...
Oct 4, 2018 — Perhaps the satirical edge of Irresistible will make it the project that establishes Stewart's directorial P.O.V., launching him into the heart of the 2020 ...

TSIS essay MI (HOW CAN WE BRIDGE THE DIFFERENT ...) Feb 20, 2019 — Tolerance and recognize the differences POV ... US= diverse outside/ segregated inside <-> Social media 1. Military ... Hibililly Elegy -J.D Vance.

Is the Center for Immigration Studies a hate group ... - PolitiFact
Claim: Is the Center for Immigration Studies a 'hate group'?
Claimed by: Southern Poverty Law Center
Fact check by PolitiFact: CIS says no

YourPaysitePartner Announces Launch of Inserted.com - XBIZ
Jan 14, 2022 — "When everything is shot POV, and the actress is the only one talking, ... Ohio Republican Senate Candidate JD Vance Calls for 'Outright Ban' on Porn.

'Stay Home POV' Site Debuts on Team Skeet Network - XBIZ
May 4, 2020 — "Stay Home POV," a new quarantine-themed site from the Team Skeet Network, has made its debut.
I'm bringing Ohio values to DC, but I can't do it alone. Donate today to help my campaign. I'm running to put America First Again and stop the Left. Donate to support our campaign.

Support JD Vance · Join JD to Save Ohio
JD Vance Puts America First - Support JD Vance for US Senate

America needs politicians who will continue America First Policies. Donate to JD Vance. JD will fight for Ohio values and Make America Great Again. Chip in to join the fight.

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the babadook, and what i read in october and november
Dec 5, 2014 — This is a mother's worst fear: becoming the evil mother of horror movies and fairy tales. At this point, the film's **POV** flips. She's the monster, and her son is ...

https://relevantmagazine.com › culture › the-trailer-for...

**The Trailer for Netflix's 'Clickbait' Dares to Ask What It Would ...**
Aug 11, 2021 — The episodes will apparently follow a revolving **POV** that will detail each family member's memory of Nick and uncover new things about the man they thought they ...

https://anthropology.stanford.edu › sbiybj9346 › PDF

**body / object narratives** - Stanford Anthropology
Jul 28, 2019 — cal framework to understand pov-erty from an outside perspective ... this interplay: J.D. Vance's Hillbilly ... Media representations of male-only.

https://www.kevinrooke.com › book-genres › biography ›

**The Most Recommended Biography Books** - Kevin Rooke

http://bradberens.com › category › books ›

**Category Archives: Books** - BradBerens.com
Mar 27, 2022 — Delightful short SF novel, almost a novella, told from the **POV** of a half-organic, half-robotic "SecUnit" (security unit) working for a landing party that is ...

https://www.aei.org › uploads › 2019/12 › Ameri...

**American Family Diaries**

http://bradberens.com › category › books ›

**Category Archives: Books** - BradBerens.com
Mar 27, 2022 — Delightful short SF novel, almost a novella, told from the **POV** of a half-organic, half-robotic "SecUnit" (security unit) working for a landing party that is ...

https://www.turningpagemag.com › ...

**2017 - Turning Page**
Jun 13, 2017 — Audiobooks may not have netted as much revenue as other media forms in the last ... J.D. Vance's Hillbilly Elegy speaks to what it's like to come up from a ...

https://newleftreview.org › issues › PDF

**ii124.pdf - New Left Review**
Aug 14, 2020 — oned with the uniqueness of cinema as a **medium** and drew resources ... day, the upper line chosen as roughly equivalent to the 2005 us pov-.

https://hatewatchindia.com › files › ebooks › pdf1 › PDF

**American Islamophobia** - hatewatchindia.com
Jan 27, 2017 — Evelyn Alsultany, author of Arabs and Muslims in the Media: Race and ... population live below or dangerously close to the 2017 federal pov-.

https://www.theguardian.com › global › mar › turning-...

**Critics be warned: Turning Red is defiantly Asian and female ...**
Mar 24, 2022 — Like all the best stories, Turning Red speaks from a **POV** that's detailed, specific and idiosyncratic: it's about a Chinese Canadian girl named Mei i ee...
JD Vance Puts America First - Support JD Vance for US Senate

America needs politicians who will continue America First Policies. Donate to JD Vance. JD will fight for Ohio values and Make America Great Again. Chip in to join the fight.

Support JD Vance · Join JD to Save Ohio
Books for Readers Issues 206-210 - Meredith Sue Willis
Oct 24, 2020 — Deborah Clearman, author of Remedios, writes to say. "Cultural appropriation is an issue I deal with all the time, since I often write from the **POV** of...

The Film of the Book - TV Tropes
Mar 15, 2020 — "From J.K. Rowling, the author of the book series that kept Borders open for another few years, comes the movie adaptation for people too lazy to read." - Epic ...

Weekend Music Thread - The Rain Song - PlanetPOV
Mar 26, 2022 — Some of the White House's allies are concerned. [...] How Hollywood and the Media Fueled the Political Rise of J.D. Vance.

The end of American democracy is unimaginable - Crooked...
Jan 30, 2022 — From a Democratic **POV**, that will look like everyone else assigning agency to Democrats but not to themselves. The problem lies in the refusal to notice ...

The Real World SIXTH EDITION | El Bim - Academia.edu
Jan 27, 2020 — Real Culture 88 DATA WORKSHOP: Analyzing Media and Pop Culture: How the Image ... the Scotch-Irish people, including a reference to J.D. Vance have been ...

The Artist's Corner « hl gibson, author
May 9, 2018 — Three is a charm, so I’ll take one of my still lifes, one macro, and my latest from this summer, a multiple **POV**/reection photo. (View Rosita's photographers ...

Amusement Parks In North Carolina: A Huffington Post Travel ...

SOCIOECONOMIC STATUS DISCRIMINATION Danieli Evans ...
Jan 12, 2018 — is a nice way of saying ‘gtfo, pov.’ 5. Discrimination based on socioeconomic status (SES) is routine. Employers screen applicants by residential address ...

Swings in Tech Sector Spark Volatility in Hot SPAC Market
Mar 10, 2021 — ...cial-media research rm Story-ful found more than 100,000 ... Endemic **POV**- ...

Annalachia: a forceful rebuttal to J.D. Vance's "Hillbilly
I'm bringing Ohio values to DC, but I can't do it alone. Donate today to help my campaign. I'm running to put America First Again and stop the Left. Donate to support our campaign.

Support JD Vance · Join JD to Save Ohio
Commack Public Schools Riven by Rage about CRT - Diane …

Jul 29, 2021 — J. D. Vance is running for Portman’s seat in Ohio. … Para 5 of the article nutshells pretty well the MS liberal POV on CRT. All that was 25-35 yrs ago, …

http://www.eatrunread.com: 2011/06

June 2011 - Eat, Run, Read

Jun 30, 2011 — The novel was originally written in first person, why do you think Dostoyevsky decided to change it into third? How did the POV affect the telling of the story?

https://astralcodexten.substack.com: contra-hanania-on-p…

Contra Hanania On Partisanship - by Scott Alexander - Astral …

Aug 12, 2021 — It looks like JD Vance is running on a pro-natalist platform. Is pro-natalism liberal or conservative? To me partisanship is about team red and team blue and …

https://amst.winter-verlag.de: data › article › pdf

Amerikastudien / American Studies 66.1 (2021)

Jun 10, 2021 — January 6 was only the latest in a long history of assaults on the media, in … tators such as Justin Gest, J. D. Vance, Joan C. Williams, and Kather-

https://www.wikiwand.com: Amy_Holmes

Amy Holmes - Wikiwand

Dec 15, 2021 — Documentaries. Independent Lens (episodes); POV (episodes) · Drama. Masterpiece · Music and fine arts. Art:21 · Austin City Limits · History. American Experience ( …

https://slatestarcodex.com: 2019/04/15

Increasingly Competitive College Admissions: Much More …

Apr 15, 2019 — It is still easy to get into medium-to-lower-tier colleges. … That is obviously what you should have been doing from my POV.

https://podcastaddict.com: podcast

The John Batchelor Show - Podcast Addict

Sep 4, 2021 — @Batchelorshow #Ukraine: It’s about supply lines: Kyiv POV …

https://wkdd.iheart.com: movies-with-milan › content

Milan's Movie Capsule December 3, 2020 | 98.1 KDD

Dec 3, 2020 — (A MINUS.) HILLBILLY ELEGY--J.D. Vance's best-selling 2016 memoir about growing up poor and disenfranchised in southwestern Ohio has been turned into an awards …

https://www.mcclernan.com: 2016/09

September 2016 - Heavens to Mergatroyd

Sep 30, 2016 — J. D. Vance, author of Hillbilly Elegy, who has charmed the gullible media with his aw-shucks, white racists is jes folks persona has revealed his true …

https://www.askamanager.org: 2017/07 › european-clien…

European clients are sneering at my American colleagues …

Jul 31, 2017 — It’s a consequence of the fact that American media is everywhere. … I imagine it was much worse for J.D. Vance (the author of Hillbilly Elegy) because not
America needs politicians who will continue America First Policies. Donate to JD Vance. JD will fight for Ohio values and Make America Great Again. Chip in to join the fight.

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Support JD Vance - Join JD to Save Ohio
/snow/ - Leftcows #27 - Dasha's SAGging Face Edition

Mar 26, 2022 — ... Did she not read to the end where JD Vance says Trump should fire every single government employee who's not "one of ... 

Idaho Statesman, Sept. 18, 2016 by Idaho Statesman - Issuu

Jan 25, 2017 — So to the public and media, Friday's successful rocket jump carried a tinge of bewilderment. Where was the showcase? ... "Hillbilly Elegy" by J.D. Vance 6.

Highlight on the Latest Development in Indonesia - FEB UNS

Apr 16, 2019 — This also followed by synergy with the media to provide positive information to build national ... Hillbilly Elegy [Audiobook + ePub] by J. D. Vance !

The Right Time with Bomani Jones by ESPN - Podknife

Mar 16, 2019 — "Hillbilly Elegy" by J.D. Vance; "Sex, Lies and Headlocks: The Real Story of ... Bomani Jones and Michael Smith discuss being "grown" in the social media ... 

document_sitemap_2021_02_6.xml - Course Hero

Feb 6, 2021 — ... https://www.coursehero.com/file/8102281/Jd-vance-paperdocx/ 2022-04-09 ...

#Rebecca Cavallaro | Explore Tumblr Posts and Blogs | Tumgir

May 15, 2011 — For a while now, since my dark academia rec list was such an unexpected success, I've wanted to create a list of all the dark academia books I'm personally ...

#utah werewolf | Explore Tumblr Posts and Blogs | Tumgir

Apr 20, 2020 — Tumblr media. Hillbilly Elegy was panned by critics over politics that had absolutely no role the film. Based on the best-selling memoir by J.D. Vance, ...

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Apr 16, 2022 — There are reports their factories have been located by media reports (their ... Germans or Danes), but from my pov, Romania went from the only civilised ...

V. Putin Ain't No Corn Pop | Kunstler

Mar 19, 2021 — Just like the leftist led media no facts just what they want to be reality. ... The old Liberal Democrats are probably closest to my pov, and they are long ...

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