

Campaign Legal Center v. Iowa Values

Highlights of Evidence

In Campaign Legal Center's [groundbreaking suit against the dark money group Iowa Values](#), CLC has filed proposed [Findings of Fact](#) and [Conclusions of Law](#) that detail how Iowa Values broke federal campaign finance law by raising and spending millions of dollars in undisclosed, secret money to help re-elect U.S. Senator Joni Ernst in 2020. Iowa Values accomplished this by purporting to operate as a 501(c)(4) "social welfare" nonprofit when, in reality, it functioned as an unregistered, single-candidate political committee (PAC) supporting Ernst.

CLC's proposed Findings of Fact explain the story of Iowa Values, including its activities, and the intent behind them, as revealed in vivid detail in more than 4,000 pages of documents and testimony, and numerous digital advertisements. The sweeping record lays bare how, between 2017 and 2020, individuals and entities associated with Senator Joni Ernst—including two former campaign managers, her lawyer, and her fundraiser—collaborated to execute a scheme to secretly help re-elect Ernst to the Senate while evading federal campaign finance disclosure laws that require transparency about fundraising and spending to influence federal elections.

Although Iowa Values continues to insist that "its mission was only 'to educate the public about . . . public policy issues of national importance,'" the evidence overwhelmingly proves otherwise.

A full analysis of the more than 4,000-page evidentiary record is available in CLC's [Findings of Fact](#) and [Conclusions of Law](#). But even a small snapshot of the evidence in this case exposes Iowa Values's indisputable plans and strategy for re-electing Ernst.

Below are highlights from the voluminous evidentiary record, which reveal and confirm Iowa Values's overarching purpose of re-electing Ernst in 2020.

ILLUSTRATIVE EVIDENCE FROM THE IOWA VALUES CASE

1. [April 2017 email exchange re: 2015 & 2016 Roast & Ride Raw Footage \(see Findings of Fact ¶¶ 110, 418-20\)](#):

In this April 2017 email exchange, Iowa Values's and Ernst's shared lawyer, Ronald Jacobs, invokes his overlapping roles as legal counsel for both Ernst and Iowa Values to obtain access to footage and finished video content of Ernst for use by Iowa Values in its advertising. Jacobs explains, "I handle legal issues for Senator Ernst (campaign, leadership PAC, Roast & Ride, etc.). . . . I'm working with Jon Kohan on a new 501(c)(4) that will be supportive of Senator Ernst, and the c4 is interested in seeing the raw footage to see what we have."

2. [May-June 2017 email exchange re: Iowa Values Shoot Opportunity \(see Findings of Fact ¶¶ 421-28, 581\)](#):

In this subsequent email chain following up on Iowa Values's successful purchase of past Roast & Ride footage, Iowa Values's then-Executive Director Jon Kohan proposes to the Iowa Values Board, Jacobs, and Iowa Values's fundraiser Claire Holloway Avella that Iowa Values

acquire additional Ernst footage by shooting an upcoming Roast & Ride event. Kohan specifically proposes “get[ting] tons of shots of Joni hugging, talking, listening, with lots of groups of everyday Iowans in casual attire,” noting the plan to “shoot it in a way that makes it look[] like a backyard barbecue, or fair atmosphere, rather than a Joni branded event.”

After filming the event, Kohan reported back to the group that Iowa Values “got everything we came for”: “tons of Joni hugs, smiles, handshakes, selfies, autographs, you name it with all sorts of different folks. All the warm, big smile Joni stuff we want to compile.”

3. [September 19, 2017 strategy memo re: “Iowa Values Data Initiative” \(see Findings of Fact ¶¶ 172-78\)](#)

This 2017 strategy memo explains Iowa Values’s early data efforts and states explicitly Iowa Values’s goal of supporting Ernst’s re-election efforts: “Looking ahead to next cycle, we believe that investing time and resources now in creating a database that can interface with all the vehicles associated with, or interested in helping Joni Ernst, is a potentially significant advantage heading into her reelection effort in 2020.”

The memo explains the importance of starting this work in 2017, to “ensure we have the runway necessary to establish standard operating procedures across organizations to maximize the usefulness of the data set.” This would “pay off” “[d]own the road . . . when communication across entities is legally restricted, but everyone understands what is required of them to ensure that everyone has access to the best data possible.”

Iowa Values’s fundraiser provided this memo, and a nearly identical version from 2018, to numerous potential donors when soliciting contributions to Iowa Values.

4. [January 2018 email exchange between Iowa Values’s Executive Director, its Board, lawyer, fundraiser, and data vendor \(see Findings of Fact ¶ 111\)](#)

In this email, Iowa Values’s then-Executive Director Jon Kohan proposed that Iowa Values retain two vendors because of their connections to Ernst, noting that one was “tightly involved with Team Joni,” and the other was “a crossover vendor with Joni.”

5. [February 2018 email exchange re: “Welcome to Spark!” \(see Findings of Fact ¶¶ 121, 610\)](#)

This email exchange reflects how vendors handling Iowa Values donations understood and treated donations to Iowa Values as donations for an “Ernst entity,” while also understanding that Iowa Values was “supposed to be an unrelated” social welfare nonprofit.

6. [August 2018 Iowa Values email solicitation \(see Findings of Fact ¶ 618\)](#)

Iowa Values’s fundraiser Claire Holloway Avella routinely referenced prior introductions by Ernst when soliciting contributions to Iowa Values. This August 2018 solicitation includes an introductory email *from Ernst herself*, noting for the redacted donor how “wonderful” it was “catching up with you yesterday” and thanking them “for your pledge to contribute \$10,000

to my Ernst Victory Iowa committee.” Ernst explained that she had “also copied Claire Holloway Avella on this email who will be in touch with you regarding the other effort we discussed.”

Iowa Values’s fundraiser, Holloway Avella, followed up with the prospective donor the next day to “attach[] a brief update on our activities through Iowa Values,” as well as an Iowa Values contribution form.

7. [“Strategy Overview: Iowa Values - 2019” \(see Findings of Fact ¶¶ 264-66\)](#)

This 2019 strategy memo is one of numerous strategy documents articulating Iowa Values’s plan to identify and target a subset of Iowa voters to persuade them to support, turn out, and vote for Ernst in November 2020. Iowa Values named its multi-year strategy “Operation Firewall.” This particular version of Iowa Values’s strategy memo confesses at the outset that “Iowa Values goal is first and foremost helping re-elect Senator Joni Ernst,” later describing Iowa Values’s focus on “the most critical segments of the electorate for Senator Ernst in 2019 and 2020.”

The memo elaborates on Iowa Values’s planned voter identification and mobilization activities in 2019 and 2020, explaining that ultimately, “moving into election season, [Iowa Values’s] field force will pivot to turn out each Joni Ernst supporter on November 3rd.”

8. [“Strategy Overview and Update: Iowa Values - 2019” \(see Findings of Fact ¶¶ 267-74\)](#)

In another version of Iowa Values’s 2019 strategy memo, Iowa Values emphasizes that the “strong frequency” of Iowa Values’s voter contact was “meant to burn in a favorable impression of Senator Ernst on the issues most important to specific voters.”

This strategy memo spells out Iowa Values’s intent to counter anti-Ernst advertisements, describing in detail attack ads that had been aired against Ernst, and Iowa Values’s plan to react to them to “help Senator Ernst maintain her edge in polling and not allow the opposition to define her early.”

Iowa Values’s fundraiser provided this memo to numerous potential donors when soliciting contributions to Iowa Values in August and September 2019.

9. [May 2019 email exchange with Ernst’s chief of staff regarding Iowa Values solicitation \(see Findings of Fact ¶¶ 700-01\)](#)

In this May 2019, email exchange, the shared fundraiser for Iowa Values and the Ernst campaign, Claire Holloway Avella, coordinates with Ernst’s chief of staff, Lisa Goeas, about

Holloway Avella staffing a meeting with a prospective donor who would “have checks for Joni” to ensure that Holloway Avella could also “ask them about Iowa Values.”

10. [June 2019 “Iowa Values Re-Launch Talkers” \(see Findings of Fact ¶¶ 393-99\)](#)

This list of talking points for Iowa Values canvassers includes a section titled “What’s the message?” with the responsive talking point that “Joni Ernst has been fighting for our Iowa values her whole life, whether serving . . . [a]s the Montgomery County Auditor, [i]n the state senate representing southwest Iowa, [a]s a Lt. Colonel in combat in the middle east, [o]r as our US Senator.”

The talking points also include response to a question asking if Iowa Values is “just a front for a pro-Joni pac?”—which does not answer that question “no,” but instead suggests that Iowa Values “is focused on issues that matter to Iowans,” listing particular issues, and then providing “[e]xamples of Joni working hard for Iowans,” as “pulled from [Iowa Values’s] canvassing palmcard.”

11. [July 2019 Iowa Values press release – “Conservative Organization Begins Voter Outreach: Iowa Values Announces Digital Advertising Blitz and Door to Door Voter Canvassing” \(see Findings of Fact ¶¶ 361-63, 446\)](#)

In July 2019, in conjunction with its first round of pro-Ernst digital ads, Iowa Values issued a press release (which it promoted on Facebook), announcing that it had “launched a six-month voter education and data collection blitz across Iowa last week” and had “invested six-figures in a digital advertising campaign that will touch swing voters in all 99 counties.” Iowa Values’s press release describes this “large-scale effort” as “just the beginning of an election-long effort by Iowa Values to highlight the work of Sen. Joni Ernst,” and features a quote from Iowa Values’s Board member Paula Dierenfeld praising Ernst for having “selflessly served our community, state, and nation, and made a lifetime of tough choices,” and explaining Iowa Values’s plan “to make sure everyone knows how she’s fighting for all Iowans in Washington.”

12. [June-July 2019 digital ads promoting Ernst as the leader “We deserve.” \(see Findings of Fact ¶¶ 449-53\)](#)




In the summer of 2019, Iowa Values began its 2019 pro-Ernst advertising campaign, with digital video and display ads featuring and promoting Ernst. This particular video ad promotes Ernst as a leader “we deserve,” while touting her “Iowa Values.” It lasts 30 seconds long (with 22 of those seconds featuring Ernst on screen), and it ran on Facebook and YouTube in June and July 2019.

The voiceover states: “What are the values that make Iowans different? Caring for our neighbors. Putting service over self. And doing the right thing even when it’s hard. We deserve leaders who have walked in our shoes and share these beliefs. Like Joni Ernst.

Standing up for Iowans all across our state and fighting for what we believe in. We are Iowans. These are our Iowa Values.”

13. [Iowa Values Modeling Slide Deck \(see Findings of Fact ¶¶ 342-43\)](#)

This slide presentation reflects Iowa Values’s internal analysis and assessment of the Iowa Values electorate. Iowa Values engaged in three rounds of modeling of the Iowa electorate in 2019 and 2020, to identify which voters to target with door-to-door canvassing and advertising. Slide decks like this one presented results and analysis of each round of modeling, including specifically identifying Iowa Values’s universes of voters to target for “persuasion,” “turnout,” or “both”:

 Persuasion: 374,322  Turnout: 249,123  Both: 370,859	High Turnout, Hard Greenfield 211,790 [DJT -71.7%]	High Turnout, Lean Greenfield 103,433 [DJT -52.5%]	High Turnout, Swing 174,005 [DJT -17.0%]	High Turnout, Lean Ernst 96,884 [DJT +29.9%]	High Turnout, Hard Ernst 397,228 [DJT +67.7%]
	Mid Turnout, Hard Greenfield 128,972 [DJT -62.7%]	Mid Turnout, Lean Greenfield 87,093 [DJT -41.5%]	Mid Turnout, Swing 225,098 [DJT -11.0%]	Mid Turnout, Lean Ernst 145,761 [DJT +27.1%]	Mid Turnout, Hard Ernst 192,214 [DJT +61.2%]
	Low Turnout, Hard Greenfield 57,698 [DJT -70.4%]	Low Turnout, Lean Greenfield 50,030 [DJT -27.6%]	Low Turnout, Swing 142,618 [DJT -15.3%]	Low Turnout, Lean Ernst 75,064 [DJT +14.5%]	Low Turnout, Hard Ernst 56,909 [DJT +46.9%]

14. [Iowa Values “2020 Recap” Slide Deck \(see Findings of Fact ¶¶ 736-40\)](#)

This post-2020 election slide deck reflects on the collaborative efforts by Iowa Values and Iowa Values Action, the super PAC it set up in 2020 to collectively support Ernst’s re-election efforts, describing the two organizations’ intertwined goals, plans, fundraising and spending between 2019 and 2020 as a single, unified project to re-elect Ernst.

One slide revealingly claims credit for “Iowa Values’ Unique Position” as the “Only Entity Focused on Senator Ernst.”