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Brendan Fischer and Sophia Gonsalves-Brown / October 30, 2026

How Super PACs Are Hiding Tens of Millions of Dollars in Candidate Spending

Super PACs are coordinating directly with candidates on canvassing – while hiding which candidates they're helping and how much they're spending.

Elon Musk gave a stunning $76.8 million to America PAC in the first two weeks of October alone, bringing his total midterm contributions so far to nearly $450 million. To put that staggering sum in perspective, a person saving $100,000 every single year would need 4,500 years to accumulate that much money.

But America PAC's latest Federal Election Commission (FEC) report reveals something else: The PAC appears to be obscuring which candidates benefit from its massive canvassing operation.

America PAC is supporting dozens of candidates this election cycle and has spent over $43 million on door-to-door canvassing through October 14. But it isn't disclosing which candidates benefit from that canvassing spending, or how much is spent supporting each candidate.

This is significant, because those canvassing expenditures appear to be *directly coordinated* with the candidates themselves.

America PAC isn't alone. Super PACs supporting both parties are spending tens of millions of dollars on canvassing expenditures coordinated with candidates in the 2026 election cycle, but barely reporting any of it.

How are super PACs hiding their coordinated spending?

These transparency gaps are a little-noticed consequence of a 2024 FEC advisory opinion that allowed super PACs – which are supposed to operate independently of campaigns – to coordinate their canvassing expenditures with candidates.

America PAC notoriously exploited this advisory opinion as it openly coordinated its 2024 canvassing activities with the Trump campaign. That cycle, America PAC reported almost all of its canvassing spending on Schedule E, where PACs report "independent

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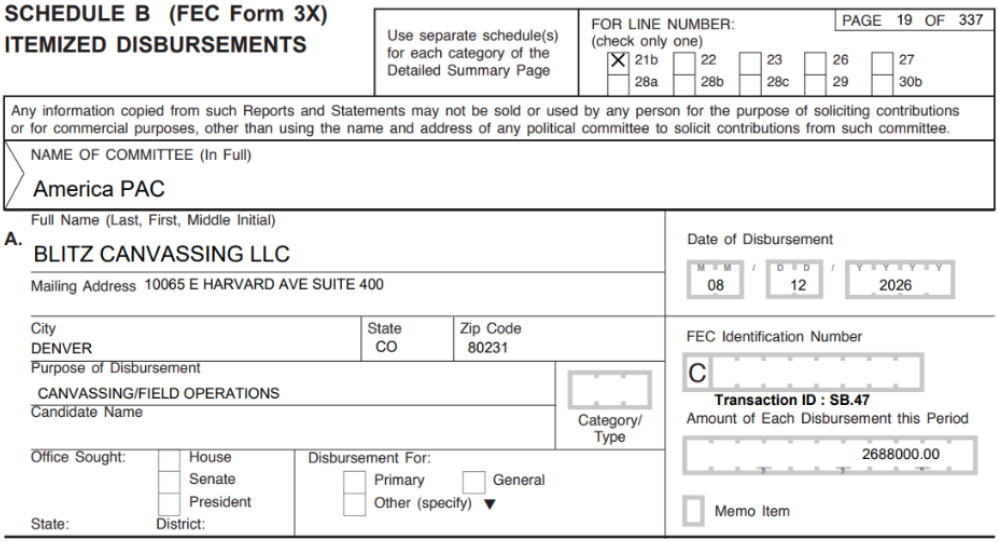
expenditures" and must provide detailed information about the candidates supported and amounts spent.

This cycle, it isn't doing that. Instead, America PAC reports lump-sum payments for "canvassing/field operations" as regular operating expenditures on Schedule B, which committees use to report disbursements like rent and payroll. For example:



SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS

Use separate schedule(s) for each category of the Detailed Summary Page

FOR LINE NUMBER: (check only one)
[X] 21b [ ] 22 [ ] 23 [ ] 26 [ ] 27
[ ] 28a [ ] 28b [ ] 28c [ ] 29 [ ] 30b

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NAME OF COMMITTEE (In Full)
America PAC

A. Full Name (Last, First, Middle Initial)
BLITZ CANVASSING LLC

Mailing Address 10065 E HARVARD AVE SUITE 400

City: DENVER | State: CO | Zip Code: 80231

Purpose of Disbursement: CANVASSING/FIELD OPERATIONS

Candidate Name:

Category/ Type:

Office Sought: [ ] House [ ] Senate [ ] President
State: District:

Disbursement For: [ ] Primary [ ] General [ ] Other (specify)

Date of Disbursement: 08 / 12 / 2026

FEC Identification Number: C

Transaction ID : SB.47

Amount of Each Disbursement this Period: 2688000.00

[ ] Memo Item

Schedule B reports disclose payments to canvassing vendors but – in contrast with Schedule E independent expenditure reports – not which candidates benefit, or how much is spent supporting or opposing each candidate.

The apparent explanation is that if canvassing expenditures are coordinated with candidates, they aren't "independent" and thus not reportable as independent expenditures. But independent expenditure reports provide much more detailed information, and are relied upon by the media, watchdog groups, and policymakers to assess the total amount of money spent in support of or opposition to candidates.

This means that America PAC's spending in support of candidates this cycle is much higher than has been reported. And it obscures which candidates are working with Musk's political operation.

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What super PACs have been concealing spending on coordinated canvassing?

America PAC isn't alone. Other committees are also reporting their coordinated canvassing expenditures as regular operating expenditures, rather than providing the detail required for independent expenditures. For example:

- The Sentinel Action Fund, a super PAC that describes itself as the "only Super PAC on the Right with a year-round ground game committed to turning out absentee, early vote, and 'day of' voters," has reported spending almost $8 million on "canvassing – early vote education" so far this cycle. That is half of the $15.9 million the committee has reported spending on independent expenditures in the midterm elections, potentially obscuring the amount spent to support or oppose candidates by 50 percent.
- Stronger Maine, a super PAC supporting Sen. Susan Collins' reelection efforts, appears to have initially reported its canvassing as independent expenditures, disclosing $275,000 spent in May and June. However, beginning in the summer, Stronger Maine changed their tack. From July through October 14, the committee reported $2.7 million in canvassing payments on Schedule B. In the same period, Stronger Maine reported just over $2 million in independent expenditures supporting Collins or opposing her opponent, Troy Jackson. The committee's reported independent expenditures in Maine may therefore have been less than half its actual spending on the race.

Some super PACs – which are also known as "Independent Expenditure-Only Political Committees" – have not made any independent expenditures at all, and are reporting most or all of their overall spending as canvassing-related Schedule B disbursements:

- Families for an Affordable San Francisco, a super PAC that is openly coordinating with Democrat Scott Wiener in his bid for Nancy Pelosi's Congressional seat, has spent nearly $1.9 million, with most disbursements including "canvassing" in the description. The PAC has not reported making any independent expenditures.
- 49th State PAC, a super PAC that is "focusing [their] statewide voter turnout efforts on Mary Peltola for Senate and Bill Hill for the Congress" in Alaska, has reported just under $2.2 million on canvassing-related spending on Schedule B,

nearly all of the committee's reported spending so far. 49th State PAC has not reported making any independent expenditures.

- Mississippi Forward PAC, a super PAC hiring field organizers to support Democrat Scott Colom's campaign for U.S. Senate, has reported $1.6 million of their total $2.1 million in spending as "canvassing" and "canvassing literature" transactions on Schedule B. This PAC also has not reported making any independent expenditures.

Other committees have reported canvassing-related expenditures on both Schedule B and Schedule E – which suggests that some canvassing activities are coordinated with candidates, and others conducted independently:

- Americans for Prosperity (AFP) Action reported roughly $3 million on canvassing and doorhanger-related expenses as Schedule B disbursements. Unlike most other committees reporting their activity this way, the super PAC voluntarily added some identifying candidate information to their payment descriptions reported to the FEC, including the relevant state and whether the election was for House or Senate. AFP Action has also reported approximately $5.4 million on canvassing and doorhanger production as independent expenditures.
- Texas Organizing Project Political Action Committee (TOP PAC) has reported $421,000 on canvassing services, literature, and related expenses on Schedule B, and another $500,000 on canvassing on Schedule E.

Why does hiding information about coordinated canvassing expenditures matter?

These examples are illustrative of the upside-down consequences of the FEC's 2024 advisory opinion. The PAC expenditures that are *directly coordinated* with candidates and of greatest value to their campaigns are reported on Schedule B, which provides voters minimal information. The expenditures made *independently* of candidates are reported by PACs on Schedule E, which disclose much more detailed information about the candidates supported or opposed, and the amount spent on the overall race.

This is a particular problem with a nationally focused committee like America PAC, which is supporting dozens of candidates in dozens of races this cycle. We have no idea which candidates are benefiting from the PAC's $43 million-plus in canvassing expenditures that are coordinated with those candidates.

The transparency consequences are more significant when dark money groups make coordinated canvassing expenditures. Unlike PACs, dark money groups do not file periodic reports with the FEC disclosing their fundraising and spending; they only file reports when they pay for independent expenditures or certain broadcast ads.

Because spending on coordinated canvassing is not an independent expenditure, dark money groups have *no* reporting obligations when spending potentially tens of millions of dollars on canvassing activities advocating for the election or defeat of a candidate – provided that those expenditures are coordinated with the candidate that benefits.

This may explain why the 501(c)(4) Turning Point Action did not report a single expenditure to the FEC in 2024, despite spending tens of millions of dollars on canvassing expenditures to elect Trump and other Republicans, with some or all of those expenditures made in coordination with the Trump campaign or the Republican National Committee.

Turning Point Action has also not reported any independent expenditures to the FEC in the 2026 election cycle, despite publicly running a ground game in battleground states including Arizona, Nevada and New Hampshire.

Notably, the law generally treats expenditures coordinated with candidates as contributions, which candidates must report as having received, and which are subject to contribution limits and source restrictions (like the ban on corporate contributions). The FEC's legally unsound 2024 advisory opinion gave candidates free rein to coordinate with super PACs and dark money groups on canvassing activities – and permitted candidates to accept unlawful contributions without reporting them. But it does not appear that the FEC considered how the groups paying for those coordinated expenditures would report – or not report – the coordinated canvassing activity, even though it was a foreseeable consequence of their reinterpretation of the law to allow coordinated canvassing.

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What can we do to make political spending more transparent?

Campaign Legal Center and CREW have filed a lawsuit to challenge the FEC advisory opinion that opened the door to concealed canvassing coordination. The stakes extend beyond whether super PACs can coordinate with campaigns: Voters also need to know which candidates benefit from that spending and how much is spent supporting them.