

# COMPLAINT FORM

Alleging a Violation of the Georgia Government Transparency and Campaign Finance Act

**JURISDICTION:** This office has jurisdiction ONLY in matters involving financial disclosure, campaign finance, and lobbyist disclosure. O.C.G.A. §45-1-6 covers state vendor disclosure law as outlined in the Campaign Finance Act in O.C.G.A. Title 21-5 et seq and O.C.G.A. §45-1-6 covering state vendor disclosure law. Please ensure that your complaint is within the Commission's jurisdiction.

Mail or hand delivery original signed/notarized form and attachments to above address.

### I. PERSON BRINGING COMPLAINT = COMPLAINANT:

<b>Name:</b>	Georgia Republican Party, Inc. c/o Vincent Russo, Deputy General Counsel					
<b>Address:</b>	3110 Maple Drive NE					
<b>City:</b>	Atlanta	<b>State:</b>	GA	<b>County:</b>	Fulton County	<b>Zip:</b> 30305
<b>Telephone:</b>	(404) 856-3260	<b>E-mail (optional):</b>	vrusso@robbinsfirm.com			

### II. PARTY AGAINST WHOM COMPLAINT IS BROUGHT = RESPONDENT:

<b>Name:</b>	AFG Group, Inc. d/b/a Stacey Abrams for Governor					
<b>Address:</b>	1270 Caroline Street, Suite D120-447					
<b>City:</b>	Atlanta	<b>State:</b>	GA	<b>County:</b>	Fulton County	<b>Zip:</b> 30307
<b>Telephone:</b>	(678) 210-1495					
<b>Title of office held or sought:</b> <small>(if applicable)</small>	info@staceyabrams.com					

### III. STATEMENT OF FACTS:

State the actions of the Respondent upon which your complaint is based along with an ALLEGATION that such facts constitute one or more violations of the Georgia Government Transparency and Campaign Finance Act. See JURISDICTION above. Include relevant dates and the names and addresses of other persons who you believe have knowledge of the facts and attach any documentation/evidence that support the facts alleged in this complaint. Please see § 21-5-6.23 regarding attorneys' fees.

See Attachment.

(If continued on other side or additional paper, please check here \_\_\_\_\_)

### IV. VERIFICATION BY OATH OR AFFIRMATION – ORIGINAL NOTARY & SIGNATURES REQUIRED

STATE OF GEORGIA COUNTY OF FULTON

I, the undersigned Complainant, being duly sworn, depose (affirm) and say that the information in this Complaint is true and correct to the best of my knowledge and belief.

Notary Stamp/Crimp: Sworn to and subscribed before me  
 on November 14, 2018  
Janice W. English  
 Signature of Notary Public

My Commission Expires: March 10, 2022

#### SIGNATURE AND STATEMENT OF COMPLAINANT:

I AM,  I AM NOT, in filing this complaint acting as an agent, paid or otherwise, for any other person.

Vincent Russo

DATE: 11-14-2018

## COMPLAINT FORM INFORMATION

### COMPLAINANT *(To be completed on attached submission form)*

**Name:** Georgia Republican Party, Inc. c/o Vincent Russo, Deputy General Counsel

**Address:** 3110 Maple Drive NE

**City/State/County/Zip:** Atlanta, Georgia (Fulton County) 30305

**Telephone:** (404) 856-3260

**E-Mail:** [vrusso@robbinsfirm.com](mailto:vrusso@robbinsfirm.com)

### PARTY AGAINST WHOM COMPLAINT IS BROUGHT - RESPONDENT *(To be completed on attached submission form)*

**Name:** AFG Group, Inc. d/b/a Stacey Abrams for Governor

**Address:** 1270 Caroline Street, Suite D120-447

**City/State/County/Zip:** Atlanta, GA, Fulton County, 30307

**Telephone:** (678) 210-1495

**E-Mail:** [info@staceyabrams.com](mailto:info@staceyabrams.com)

**Title or Office Sought:** Governor

### STATEMENT OF FACTS *(To be completed on attached complaint submission form or included as separate addendum to the complaint)*

The present complaint is submitted against AFG Group, Inc. d/b/a Stacey Abrams for Governor (“SAFG”) - the principal candidate committee of Democrat gubernatorial nominee Ms. Stacey Yvonne Abrams - in light of actions and conduct undertaken by the committee that appears to be in violation of the Georgia Government Transparency and Campaign Finance Act (the “Act”). Based upon the facts highlighted herein, as well as reasonable belief formed from media coverage of SAFG’s activities in the wake of Governor-Elect Brian Kemp’s victory on Tuesday November 6, 2018, there is a substantial basis to believe that SAFG has violated multiple tenets of Georgia campaign finance law that fall within the investigative and enforcement jurisdiction of the Georgia Government Transparency and Campaign Finance Commission (the “GGTCFC” or the “Commission”).

In light of the facts set forth herein, we hereby request that the GGTCFC open an immediate investigation into the improper and unlawful conduct of SAFG and pursue all viable remedies available by law to bring an end to these blatant violations of Georgia’s campaign finance laws.

**Violation: Improper Disposition, Expenditure and Custodial Protection of Campaign Funds in Contravention of Sections 21-5-33 and 21-5-43 of the Act**

On or about November 8, 2018 - just two days after losing the General Election race for Georgia's Governor to Governor Elect Brian Kemp - SAFG began disseminating a variety of campaign materials and seeking to purchase media advertising focused on matters related to a supposed 2018 general runoff election for Governor of Georgia. These materials and advertisements vary in tone and context, but singularly focus on the promotion and support of Stacey Abrams' candidacy for elective office in an election that does not exist and will not take place. For the sake of Commission review, we have compiled a handful of these materials as attachments to this complaint, including:

- A screen capture of a Twitter post by Ms. Lauren Groh-Wingo - Campaign Manager for SAFG - publicly alerting her several thousand followers and supporters of Ms. Abrams' campaign to the fact that SAFG was disseminating the aforementioned mailer related and purchasing the aforementioned radio ad buy for \$250,000 (*see* Attachment A);
- Examples of purchasing documentation for an attempted radio advertising buy across multiple outlets in Georgia promoting support for Ms. Abrams' candidacy in a non-existent 2018 gubernatorial general run-off election (*see* Attachment B);<sup>1</sup>
- A November 13, 2018 advertisement promoting support for Stacey Abrams' candidacy in a non-existent 2018 gubernatorial general runoff election, which is paid for by the Democratic Party of Georgia and approved by Stacey Abrams. This might also amount to an excessive in-kind contribution by the Democratic Party of Georgia to SAFG. (*see* <https://politics.myajc.com/blog/politics/new-abrams-count-every-vote/RqXsCoRI9Mlixj4Ld70hNJ/>);
- A television clip from WSB mentioning that SAFG attempted to place an ad buy with WSB, which was subsequently rejected by WSB but accepted by other stations. (*see* [http://mms.tveyes.com/transcript.asp?StationID=770&DateTime=11/11/2018%207:36:27%20AM&playclip=true&pbcs=search%3a%2b\(abrams+ad\)](http://mms.tveyes.com/transcript.asp?StationID=770&DateTime=11/11/2018%207:36:27%20AM&playclip=true&pbcs=search%3a%2b(abrams+ad))).

Additional examples of such 2018 general election run-off campaign activity by SAFG can be found in the public domain (in the multi-media context) and across the state (in the hard copy context).

Given the singular focus of the above materials and communications on supporting the candidacy of Ms. Abrams in a fictional 2018 gubernatorial general runoff election, there is ample

---

<sup>1</sup> Upon request, we would be happy to provide the Commission staff with a MP3 copy of the identified radio advertising spot designed and funded by SAFG. Please feel free to contact us to arrange for access to the associated audio file.

reason to believe that one or more violations of the Act have occurred. Although there is no transparency as to how SAFG is funding the above communications and related staff actions designed to promote Ms. Abrams' "candidacy" in a non-existent 2018 general runoff election for Georgia Governor, reasonable information and belief point to the fact that such expenses are being paid from one of two monetary sources - contributions taken in by SAFG for the 2018 general election or contributions taken in by SAFG in anticipation of a potential 2018 general run-off election. Spending of funds from either of these sources for the activities described in this complaint constitutes a violation of one or more provisions of the Act and should be immediately investigated by the Commission and punished to the full extent of the law.

If SAFG is utilizing 2018 general election contributions in its possession to defray costs associated with campaigning for a non-existent future election, such activity violates Sections 21-5-33 and 21-5-43 of the Act. As set forth in Section 21-5-33(a), contribution funds to a campaign committee can only be utilized to defray "ordinary and necessary expenses" incurred in connection with a candidate's campaign for elective office or such public officer's fulfillment or retention of such office. Concurrently, in Section 21-5-43(c), the Act specifies that contributions remaining unexpended after the date of an election may be expended for a future election in the same election cycle (to the extent one exists), or may be used as provided in 21-5-33 when no further elections exist in the election cycle or when the candidate of the campaign committee is not on the ballot of a further election in the election cycles.

Given the non-existence of a 2018 general run-off election for Georgia governor, it violates both the spirit and letter of the Act for SAFG to use 2018 general election funds for the advertising, material and staff costs identified above. Spending on campaign activities for a fictional future election that has no mathematical possibility of occurring is on its face neither ordinary nor necessary campaign spending by SAFG. In turn, it is a prospective violation of Section 21-5-33 (a) of the Act. Similarly, even if SAFG has excess funds from the 2018 general election to spend on advertising, material and staff costs in the wake of the November 6<sup>th</sup> election, it is not permissible to spend such costs on activities not delineated in Section 21-5-33(b) of the Act. Paying for radio advertising, media buys and staff costs associated with a 2018 general run-off election that will not take place using excess general election funds does not fit into any of the permissible categories under Section 21-5-33(b) (*e.g.*, charitable contributions, committee transfers, refunds, debt repayment for past election, or for use in actual future campaigns). As such, SAFG is prospectively violating both Sections 21-5-33(b) and 21-5-43(c) of the Act by funding activities for a non-existent general run-off election from excess general election funds.

If SAFG is utilizing 2018 general run-off election contributions (as opposed to 2018 general election contributions) in its possession to defray costs associated with the described campaign activities, such activity expressly violates Section 21-5-43 of the Act. The language of Section

21-5-43(d) prohibits a candidate's campaign committee that accepts contributions for a potential future election and separately accounts for such funds by way of an "Option to Choose Separate Accounting" (COOSA) from spending such contributions on the future election if it does NOT occur or if the candidate does not qualify for such future election. In such a setting, a candidate is required to return all accepted and accounted for funds to his or her applicable contributors pro rata without interest.

Given the non-existence of a 2018 general run-off election for Georgia Governor, it violates both the spirit and letter of the Act for SAFG to expend any 2018 general run-off funds it has accepted during the 2018 election cycle. Spending of these embargoed funds for any purpose - whether on the activities described herein or on activities related to litigation and SAFG wind down - runs directly afoul of SAFG's contribution custodial duties under Georgia campaign finance law and ostensibly prevents the campaign committee from fulfilling its legal obligation to donors to refund such contributions because of Ms. Abrams recent loss. In light of these facts, the Commission should take immediate action to investigate SAFG's potential spending of 2018 general run-off election contribution funds in violation of the Act and take all appropriate action to halt such behavior and assess appropriate penalties under Georgia law.

# **Attachment A**



**Lauren Groh-Wargo**  
@gwilauren

Follow

The Abrams campaign has been preparing for all possibilities. Voters who previously elected to vote by mail are receiving by mail today an absentee ballot application for the Dec 4 runoff, and we just approved a \$250k TV buy. #CountEveryVote #CantTrustKemp #gapol #teamabrams

10:15 AM - 9 Nov 2018

336 Retweets 966 Likes



39



336



966



**ex Democrat real Cherokee indian** @timmoore1973 · Nov 9

Replying to @gwilauren

How about the one where you admit you lost and stop embarrassing our state and our elections!



1



3



9



**PNB** @NaldrettPat · Nov 9  
#StopTheSteal



0



2



2



**Candace Walker** @candaceconvo · Nov 9

Replying to @gwilauren

Keeping fighting!!



0



1



7



**ex Democrat real Cherokee indian** @timmoore1973 · Nov 9

Replying to @gwilauren



**Lauren Groh-Wargo**  
@gwilauren

Campaign Manager, Stacey Abrams for Governor

Atlanta, GA

[staceyabrams.com](http://staceyabrams.com)

Joined April 2011

# **Attachment B**



SNAPSHOT ( GA - Gov. )

11/8/2018 - 11/12/2018



ALBANY	TV	GRP	CABLE	RADIO	\$5,699
Abrams	\$0	0	\$0	\$5,699	\$5,699
ATLANTA	TV	GRP	CABLE	RADIO	\$7,761
Abrams	\$0	0	\$0	\$7,761	\$7,761
AUGUSTA	TV	GRP	CABLE	RADIO	\$5,822
Abrams	\$0	0	\$0	\$5,822	\$5,822
COLUMBUS	TV	GRP	CABLE	RADIO	\$5,839
Abrams	\$0	0	\$0	\$5,839	\$5,839
MACON	TV	GRP	CABLE	RADIO	\$950
Abrams	\$0	0	\$0	\$950	\$950
TALLAHASSEE - THOMASVILLE	TV	GRP	CABLE	RADIO	\$1,434
Abrams	\$0	0	\$0	\$1,434	\$1,434

DMA	STATION	START	END	\$
ColumbusGA	WAGH-FM	11/8/2018	11/18/2018	\$2,904
ColumbusGA	WHTY-FM	11/8/2018	11/18/2018	\$2,935
AlbanyGA	WJIZ-FM	11/8/2018	11/18/2018	\$1,960
AlbanyGA	WJYZ-AM	11/8/2018	11/18/2018	\$495
AlbanyGA	WMRZ-FM	11/8/2018	11/18/2018	\$1,445
AugustaGA	IKSP-FM	11/8/2018	11/12/2018	\$330
AugustaGA	IPRW-FM	11/8/2018	11/12/2018	\$380
AugustaGA	WKSP-FM	11/8/2018	11/12/2018	\$2,707
AugustaGA	WPRW-FM	11/8/2018	11/12/2018	\$2,405
Macon	WFXM-FM	11/8/2018	11/12/2018	\$950.00
Naylor	WHLJ-FM	11/8/2018	11/12/2018	\$1,050.00
Douglas	WULS-FM	11/8/2018	11/12/2018	\$832.50
Pine Lake	WGFS-AM	11/8/2018	11/12/2018	\$600.00
Manchester	WFDR-FM*	11/8/2018	11/12/2018	\$600.00
Scottdale	WWSZ-AM*	11/8/2018	11/12/2018	\$6,250.00
Valdosta	WHLJ-AM	11/8/2018	11/12/2018	\$526.00
Albany	WMRG-FM	11/8/2018	11/12/2018	\$440.00
Thomasville	WSTT-AM	11/8/2018	11/12/2018	\$384.00
Eatonton	WYTH-AM	11/8/2018	11/12/2018	\$310.64
				\$27,504

SNAPSHOT (GA - Gov.)

11/9/2018 - 11/18/2018



	TV	GRP	CABLE	RADIO	
<b>ALBANY</b>					<b>\$6,829</b>
Abrams	\$0		\$0	\$4,559	\$4,559
Color of Change	\$0		\$0	\$2,270	\$2,270
<b>ATLANTA</b>					<b>\$188,209</b>
Abrams	\$0		\$0	\$6,209	\$6,209
DPG- Abrams	\$182,000		\$0	\$0	\$182,000
<b>AUGUSTA</b>					<b>\$4,658</b>
Abrams	\$0		\$0	\$4,658	\$4,658
<b>COLUMBUS</b>					<b>\$5,181</b>
Abrams	\$0		\$0	\$4,671	\$4,671
Color of Change	\$0		\$0	\$510	\$510
<b>JACKSONVILLE</b>					<b>\$700</b>
Abrams	\$0		\$0	\$700	\$700
<b>Macon</b>					<b>\$5,255</b>
Abrams	\$0		\$0	\$4,225	\$4,225
Color of Change	\$0		\$0	\$1,030	\$1,030
<b>Savannah</b>					<b>\$8,860</b>
Abrams	\$0		\$0	\$8,860	\$8,860
<b>Tallahassee - Thomasville</b>					<b>\$1,147</b>
Abrams	\$0		\$0	\$1,147	\$1,147

DMA	STATION	START	END	\$
ColumbusGA	WAGH-FM	11/8/2018	11/18/2018	\$2,904
ColumbusGA	WHTY-FM	11/8/2018	11/18/2018	\$2,935
AlbanyGA	WJIZ-FM	11/8/2018	11/18/2018	\$1,960
AlbanyGA	WJYZ-AM	11/8/2018	11/18/2018	\$495
AlbanyGA	WMRZ-FM	11/8/2018	11/18/2018	\$1,445
AugustaGA	IKSP-FM	11/8/2018	11/12/2018	\$330
AugustaGA	IPRW-FM	11/8/2018	11/12/2018	\$380
AugustaGA	WKSP-FM	11/8/2018	11/12/2018	\$2,707
AugustaGA	WPRW-FM	11/8/2018	11/12/2018	\$2,405
Macon	WFXM-FM	11/8/2018	11/12/2018	\$950.00
Naylor	WHLJ-FM	11/8/2018	11/12/2018	\$1,050.00
Douglas	WULS-FM	11/8/2018	11/12/2018	\$832.50
Pine Lake	WGFS-AM	11/8/2018	11/12/2018	\$600.00
Manchester	WFDR-FM*	11/8/2018	11/12/2018	\$600.00
Scottdale	WWSZ-AM*	11/8/2018	11/12/2018	\$6,250.00
Valdosta	WHLJ-AM	11/8/2018	11/12/2018	\$526.00
Albany	WMRG-FM	11/8/2018	11/12/2018	\$440.00
Thomasville	WSTT-AM	11/8/2018	11/12/2018	\$384.00
Eatonton	WYTH-AM	11/8/2018	11/12/2018	\$310.64
BrunswickG	WBGA-AM	11/9/2018	11/12/2018	\$700
SavannahG	WQBT-FM	11/9/2018	11/12/2018	\$4,430
SavannahG	WQBT-FM	11/9/2018	11/12/2018	\$4,430
MaconGA	IIBB-FM	11/8/2018	11/12/2018	\$30
MaconGA	IRBV-FM	11/8/2018	11/12/2018	\$102
MaconGA	WIBB-FM	11/8/2018	11/12/2018	\$1,721
MaconGA	WRBV-FM	11/8/2018	11/12/2018	\$1,612

DMA	STATION	START	END	\$
ColumbusGA	WAGH-FM	11/9/2018	11/9/2018	\$240
ColumbusGA	WHTY-FM	11/9/2018	11/9/2018	\$270
AtlantaGA	WRDG-FM	11/9/2018	11/9/2018	\$1,500
AlbanyGA	WJIZ-FM	11/9/2018	11/9/2018	\$590
AlbanyGA	WMRZ-FM	11/9/2018	11/9/2018	\$180
MaconGA	WIBB-FM	11/9/2018	11/9/2018	\$560
MaconGA	WRBV-FM	11/9/2018	11/9/2018	\$470



Order Confirmation

Advertiser No: 519937      Order No: 1311216531  
 Start Date: 11/08/2018      Co-op: No  
 End Date: 11/18/2018      Package: No  
 Month Type: Calendar      Agency Comm.: 15%  
 Revision #: 0  
 CPE: SAbams - GAPOLIT - 10/8-15-22  
 AE: HOUSE  
 Entered: 11/07/2018 02:13 PM by Fusion  
 Last Update: 11/07/2018 03:47 PM by MiriamD  
 Note:  
 Note 2: CIA  
 Spl Req Inv:

Stacey Abrams for Governor (GA  
 c/o Gateway Marketing  
 Attn:  
 5218 Spruce St  
 Bellaire, TX 77401

Market Station	Bind To	Start Date	End Date	No Of Weeks	Rate Rev. Type	Skip W. M T W T F S S	Spots/ W.	Spot Length	Ord Spots	Ord Cost
1 Columbus WHTY-FM	06:00-10:00 Commercial	11/08/18	11/09/18	1	17.00	0 0 0 0 11 11 0 0	22	60	22	374.00
					Local Agency-Political					
2 Columbus WHTY-FM	10:00-15:00 Commercial	11/08/18	11/09/18	1	19.00	0 0 0 0 14 14 0 0	28	60	28	532.00
					Local Agency-Political					
3 Columbus WHTY-FM	15:00-19:00 Commercial	11/08/18	11/09/18	1	19.00	0 0 0 0 14 14 0 0	28	60	28	532.00
					Local Agency-Political					
4 Columbus WHTY-FM	19:00-23:00 Commercial	11/08/18	11/09/18	1	7.00	0 0 0 0 14 14 0 0	28	60	28	196.00
					Local Agency-Political					
5 Columbus WAGH-FM	06:00-10:00 Commercial	11/08/18	11/09/18	1	24.00	0 0 0 0 10 9 0 0	19	60	19	456.00
					Local Agency-Political					
6 Columbus WAGH-FM	10:00-15:00 Commercial	11/08/18	11/09/18	1	24.00	0 0 0 0 12 12 0 0	24	60	24	576.00
					Local Agency-Political					
7 Columbus WAGH-FM	15:00-19:00 Commercial	11/08/18	11/09/18	1	30.00	0 0 0 0 10 10 0 0	20	60	20	600.00
					Local Agency-Political					
8 Columbus WAGH-FM	19:00-23:00 Commercial	11/08/18	11/09/18	1	7.00	0 0 0 0 10 10 0 0	20	60	20	140.00
					Local Agency-Political					
9 Columbus WAGH-FM	06:00-10:00 Commercial	11/12/18	11/12/18	1	24.00	0 10 0 0 0 0 0 0	10	60	10	240.00
					Local Agency-Political					
10 Columbus WAGH-FM	10:00-15:00 Commercial	11/12/18	11/12/18	1	24.00	0 12 0 0 0 0 0 0	12	60	12	288.00
					Local Agency-Political					
11 Columbus WAGH-FM	15:00-19:00 Commercial	11/12/18	11/12/18	1	30.00	0 10 0 0 0 0 0 0	10	60	10	300.00
					Local Agency-Political					
12 Columbus WAGH-FM	19:00-23:00 Commercial	11/12/18	11/12/18	1	7.00	0 10 0 0 0 0 0 0	10	60	10	70.00
					Local Agency-Political					
13 Columbus WHTY-FM	06:00-10:00 Commercial	11/12/18	11/12/18	1	17.00	0 16 0 0 0 0 0 0	16	60	16	272.00
					Local Agency-Political					
14 Columbus WHTY-FM	10:00-15:00 Commercial	11/12/18	11/12/18	1	19.00	0 16 0 0 0 0 0 0	16	60	16	304.00
					Local Agency-Political					
15 Columbus WHTY-FM	15:00-19:00 Commercial	11/12/18	11/12/18	1	19.00	0 16 0 0 0 0 0 0	16	60	16	304.00
					Local Agency-Political					



**Order Confirmation**

Page 2 of 3  
 Printed: 11/12/2018 15:08:20  
 Order No: 1311216531

Market Station	Bind To	Start Date	End Date	No Of Weeks	Rate Rev. Type	Skip W. M T W T F S S	Spots/ W.	Spot Length	Ord Spots	Ord Cost
16 Columbus WHTY-FM	19:00-23:00 Commercial	11/12/18	11/12/18	1	7.00 Local Agency-Political	0 16 0 0 0 0 0 0 0 0	16	60	16	112.00
17 Columbus WHTY-FM	06:00-23:59 Commercial	11/17/18	11/17/18	1	7.00 Local Agency-Political	0 0 0 0 0 0 30 0	30	60	30	210.00
18 Columbus WHTY-FM	10:00-15:00 Commercial	11/18/18	11/18/18	1	9.00 Local Agency-Political	0 0 0 0 0 0 0 11	11	60	11	99.00
19 Columbus WAGH-FM	06:00-23:59 Commercial	11/17/18	11/17/18	1	8.00 Local Agency-Political	0 0 0 0 0 0 18 0	18	60	18	144.00
20 Columbus WAGH-FM	10:00-15:00 Commercial	11/18/18	11/18/18	1	9.00 Local Agency-Political	0 0 0 0 0 0 0 10	10	60	10	90.00

No. of Spots/Misc/Digital:	364/0/0	Ordered Gross:	\$5,839.00
		Agency Commission:	\$875.85
		Ordered Net:	\$4,963.15
		<b>Total Net Due:</b>	<b>\$4,963.15</b>

	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov
<b>Amt. Ord.:</b>	364	0	0	0	0	0	0	0	0	0	0	0	0
<b>Gross:</b>	5,839.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Net:</b>	4,963.15	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

**Participating Customers**

Stacey Abrams for Governor (GA) 100%



Order Confirmation

Advertiser No: 519937      Order No: 1311216531  
 Start Date: 11/08/2018      Co-op: No  
 End Date: 11/18/2018      Package: No  
 Month Type: Calendar      Agency Comm.: 15%  
 Revision #: 0  
 CPE: SAbams - GAPOLIT - 10/8-15-22  
 AE: HOUSE  
 Entered: 11/07/2018 02:13 PM by Fusion  
 Last Update: 11/07/2018 03:47 PM by MiriamD  
 Note:  
 Note 2: CIA  
 Spl Req Inv:

Stacey Abrams for Governor (GA  
 c/o Gateway Marketing  
 Attn:  
 5218 Spruce St  
 Bellaire, TX 77401

Market Station	Bind To	Start Date	End Date	No Of Weeks	Rate Rev. Type	Skip W. M T W T F S S	Spots/ W. Length	Spot	Ord Spots	Ord Cost
1 Columbus WHTY-FM	06:00-10:00 Commercial	11/08/18	11/09/18	1	17.00 Local Agency-Political	0 0 0 0 11 11 0 0	22	60	22	374.00
2 Columbus WHTY-FM	10:00-15:00 Commercial	11/08/18	11/09/18	1	19.00 Local Agency-Political	0 0 0 0 14 14 0 0	28	60	28	532.00
3 Columbus WHTY-FM	15:00-19:00 Commercial	11/08/18	11/09/18	1	19.00 Local Agency-Political	0 0 0 0 14 14 0 0	28	60	28	532.00
4 Columbus WHTY-FM	19:00-23:00 Commercial	11/08/18	11/09/18	1	7.00 Local Agency-Political	0 0 0 0 14 14 0 0	28	60	28	196.00
5 Columbus WAGH-FM	06:00-10:00 Commercial	11/08/18	11/09/18	1	24.00 Local Agency-Political	0 0 0 0 10 9 0 0	19	60	19	456.00
6 Columbus WAGH-FM	10:00-15:00 Commercial	11/08/18	11/09/18	1	24.00 Local Agency-Political	0 0 0 0 12 12 0 0	24	60	24	576.00
7 Columbus WAGH-FM	15:00-19:00 Commercial	11/08/18	11/09/18	1	30.00 Local Agency-Political	0 0 0 0 10 10 0 0	20	60	20	600.00
8 Columbus WAGH-FM	19:00-23:00 Commercial	11/08/18	11/09/18	1	7.00 Local Agency-Political	0 0 0 0 10 10 0 0	20	60	20	140.00
9 Columbus WAGH-FM	06:00-10:00 Commercial	11/12/18	11/12/18	1	24.00 Local Agency-Political	0 10 0 0 0 0 0 0	10	60	10	240.00
10 Columbus WAGH-FM	10:00-15:00 Commercial	11/12/18	11/12/18	1	24.00 Local Agency-Political	0 12 0 0 0 0 0 0	12	60	12	288.00
11 Columbus WAGH-FM	15:00-19:00 Commercial	11/12/18	11/12/18	1	30.00 Local Agency-Political	0 10 0 0 0 0 0 0	10	60	10	300.00
12 Columbus WAGH-FM	19:00-23:00 Commercial	11/12/18	11/12/18	1	7.00 Local Agency-Political	0 10 0 0 0 0 0 0	10	60	10	70.00
13 Columbus WHTY-FM	06:00-10:00 Commercial	11/12/18	11/12/18	1	17.00 Local Agency-Political	0 16 0 0 0 0 0 0	16	60	16	272.00
14 Columbus WHTY-FM	10:00-15:00 Commercial	11/12/18	11/12/18	1	19.00 Local Agency-Political	0 16 0 0 0 0 0 0	16	60	16	304.00
15 Columbus WHTY-FM	15:00-19:00 Commercial	11/12/18	11/12/18	1	19.00 Local Agency-Political	0 16 0 0 0 0 0 0	16	60	16	304.00





Order Confirmation

Page 2 of 3  
 Printed: 11/12/2018 15:08:20  
 Order No: 1311216531

Market Station	Bind To	Start Date	End Date	No Of Weeks	Rate Rev. Type	Skip W. M T W T F S S	Spots/ W.	Spot Length	Ord Spots	Ord Cost
16 Columbus WHTY-FM	19:00-23:00 Commercial	11/12/18	11/12/18	1	7.00	0 16 0 0 0 0 0 0 0	16	60	16	112.00
					Local Agency-Political					
17 Columbus WHTY-FM	06:00-23:59 Commercial	11/17/18	11/17/18	1	7.00	0 0 0 0 0 0 30 0	30	60	30	210.00
					Local Agency-Political					
18 Columbus WHTY-FM	10:00-15:00 Commercial	11/18/18	11/18/18	1	9.00	0 0 0 0 0 0 0 11	11	60	11	99.00
					Local Agency-Political					
19 Columbus WAGH-FM	06:00-23:59 Commercial	11/17/18	11/17/18	1	8.00	0 0 0 0 0 0 18 0	18	60	18	144.00
					Local Agency-Political					
20 Columbus WAGH-FM	10:00-15:00 Commercial	11/18/18	11/18/18	1	9.00	0 0 0 0 0 0 0 10	10	60	10	90.00
					Local Agency-Political					

No. of Spots/Misc/Digital:	364/0/0	Ordered Gross:	\$5,839.00
		Agency Commission:	\$875.85
		Ordered Net:	\$4,963.15
		<b>Total Net Due:</b>	<b>\$4,963.15</b>

	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov
<b>Amt. Ord.:</b>	364	0	0	0	0	0	0	0	0	0	0	0	0
<b>Gross:</b>	5,839.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Net:</b>	4,963.15	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Participating Customers

Stacey Abrams for Governor (GA) 100%



**Order Confirmation**

Advertiser No: 519937      Order No: 1310523655  
 Start Date: 11/14/2018      Co-op: No  
 End Date: 11/16/2018      Package: No  
 Month Type: Calendar      Agency Comm.: 15%  
 Revision #: 0  
 CPE: SAbams - ALBANY - 7  
 AE: House  
 Entered: 11/13/2018 01:28 PM by Fusion  
 Last Update: 11/13/2018 03:46 PM by csg1cgt  
 Note: PD WireTrans: 247041852  
 Note 2: CIA  
 Spl Req Inv:

Stacey Abrams for Governor (GA  
 c/o Gateway Marketing  
 Attn:  
 5218 Spruce St  
 Bellaire, TX 77401

Market Station	Bind To	Start Date	End Date	No Of Weeks	Rate Rev. Type	Skip W. M T W T F S S	Spots/ W.	Spot Length	Ord Spots	Ord Cost
1 Albany WJIZ-FM	06:00-10:00 Commercial	11/14/18	11/16/18	1	31.00	0 x x x	8	60	8	248.00
					Local Agency-Political					
2 Albany WJIZ-FM	10:00-15:00 Commercial	11/14/18	11/16/18	1	28.00	0 x x x	12	60	12	336.00
					Local Agency-Political					
3 Albany WJIZ-FM	15:00-19:00 Commercial	11/14/18	11/16/18	1	31.00	0 x x x	13	60	13	403.00
					Local Agency-Political					
4 Albany WJIZ-FM	19:00-23:00 Commercial	11/14/18	11/16/18	1	17.00	0 x x x	11	60	11	187.00
					Local Agency-Political					
5 Albany WJYZ-AM	06:00-10:00 Commercial	11/14/18	11/16/18	1	5.00	0 x x x	14	60	14	70.00
					Local Agency-Political					
6 Albany WJYZ-AM	10:00-15:00 Commercial	11/14/18	11/16/18	1	5.00	0 x x x	14	60	14	70.00
					Local Agency-Political					
7 Albany WJYZ-AM	15:00-19:00 Commercial	11/14/18	11/16/18	1	5.00	0 x x x	14	60	14	70.00
					Local Agency-Political					
8 Albany WJYZ-AM	19:00-23:00 Commercial	11/14/18	11/16/18	1	5.00	0 x x x	14	60	14	70.00
					Local Agency-Political					
9 Albany WMRZ-FM	06:00-10:00 Commercial	11/14/18	11/16/18	1	30.00	0 x x x	9	60	9	270.00
					Local Agency-Political					
10 Albany WMRZ-FM	10:00-15:00 Commercial	11/14/18	11/16/18	1	22.00	0 x x x	11	60	11	242.00
					Local Agency-Political					
11 Albany WMRZ-FM	06:00-19:00 Commercial	11/14/18	11/16/18	1	22.00	0 x x x	10	60	10	220.00
					Local Agency-Political					
12 Albany WMRZ-FM	19:00-23:00 Commercial	11/14/18	11/16/18	1	13.00	0 x x x	10	60	10	130.00
					Local Agency-Political					

No. of Spots/Misc/Digital: 140/0/0

Ordered Gross:	\$2,316.00
Agency Commission:	\$347.40
Ordered Net:	\$1,968.60
<b>Total Net Due:</b>	<b>\$1,968.60</b>

	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov
<b>Amt. Ord.:</b>	140	0	0	0	0	0	0	0	0	0	0	0	0
<b>Gross:</b>	2,316.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Net:</b>	1,968.60	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

**Participating Customers**

Stacey Abrams for Governor (GA) 100%

## AGREEMENT FORM FOR POLITICAL CANDIDATE ADVERTISEMENTS

(check applicable box)

**FEDERAL CANDIDATE**

**STATE/LOCAL CANDIDATE**

**To Avail Themselves Of The Lowest Unit Charge During A Political Window, Federal Candidates Must Sign The Certification On Page 3**

<b>Station and Location:</b> WAGH-WHTY-WJIZ-WJYZ-WMRZ	<b>Date:</b> <i>11-13-18</i>
--	---------------------------------

I, Stephanie Lewis of Gateway Management

being/on behalf of: Stacey Abrams

a legally qualified candidate of the Democratic National Committee

political party for the office of: Governor

in the RUN OFF

election to be held on: DEC. 4, 2018

do hereby request station time as follows:

Broadcast Length	Time of Day, Rotation or Package	Days	Class	Times per Week	Number of Weeks
ATTACHED					

**Attach proposed schedule with charges (if available):** Attached

I represent that the payment for the above described broadcast time has been furnished by:

Stacey Abrams for Governor

and you are authorized to announce the time as paid for by such person or entity. I represent that this person or entity is either a legally qualified candidate or an authorized committee/organization of the legally qualified candidate.

The name of the treasurer of the candidate's authorized committee is:

Emily Ellison


This station has disclosed to me its political advertising policies, including: applicable classes and rates; and discount, promotional and other sales practices (not applicable to federal candidates).

**THIS STATION DOES NOT DISCRIMINATE OR PERMIT DISCRIMINATION ON THE BASIS OF RACE OR ETHNICITY IN THE PLACEMENT OF ADVERTISING.**

***To Be Signed By Candidate or Authorized Committee***

8.31.18

Date

  
Signature

***To Be Signed By Station Representative***

Accepted

Accepted in Part

Rejected



CGThompson III

SVPS-Cols&Alb GA

Signature

Printed Name

Title