SHADOW GOVERNORS

How nonprofits with anonymous donors influence politics and policy in the states

BY MAYA GOLD
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KEY FINDINGS

- More than one in three governors holding office as of January 31, 2017 can be linked to state-level dark money or shadow governance groups. In all, CREW identified 30 nonprofits associated with 19 governors.

- Nearly half of all Republican governors and one quarter of all Democratic governors in office as of January 31, 2017 could be linked to a dark money or shadow governance nonprofit. Fifteen Republican governors (out of 33) and four Democratic governors (out of 16) can be connected to dark money or shadow governance nonprofits.¹

- Seventy percent of identified groups did not voluntarily disclose their donors to the public.²

- Three state governors connected to dark money or shadow governance groups have declared their intention to run for re-election in 2018.³ More than two-thirds of the governors connected to these types of nonprofits (68%) are currently serving their second or third term in office. Four governors that can be linked to these types of groups (21%) hold office in states with no term limits.⁴

- Two governors holding office as of January 31, 2017 have resigned amidst scandals in which shadow governance groups played a role. Former Gov. Robert Bentley (R-AL) resigned after impeachment proceedings had begun regarding his use of public resources to conceal an affair with his senior adviser. That adviser was on the nonprofit Alabama Council for Excellent Government (ACEGov)’s payroll, and ACEGov was named as a co-defendant alongside the governor in at least two lawsuits. Former Gov. Eric Greitens (R-MO) resigned amidst an investigation by the Missouri legislature for a number of alleged offenses. A New Missouri’s records were subpoenaed by the Missouri House committee in the course of investigating these charges.


² Seven of the 30 nonprofits identified have not yet disclosed any financial information, as section 501(c) organizations are only required to submit annual reports.


INTRODUCTION

Why influence politics and policy publicly when you can do it in secret? Increasingly, nonprofit groups funded by anonymous donors are doing just that, and not just at the federal level — significant sums of untraceable money are being spent in states, both to elect governors and to push their agendas. Even more concerning, many of these nonprofits are run by close allies of those very same governors. This means these politicians likely know who is paying to promote and support them, even as voters and constituents are kept in the dark. As documented in this report, secret nonprofit spending is now widespread in the states: 19 governors in office as of January 31, 2017 have benefitted from 30 closely-aligned groups boosting their campaigns and agendas.

One way donors can secretly exert influence is through dark money groups: nonprofit organizations that, under campaign finance rules loosened in the aftermath of Wisconsin Right to Life v. FEC (2007) and Citizens United v. FEC (2010), are not subject to any contribution limits and can spend virtually unlimited amounts of money in elections without disclosing their donors. As such, dark money groups allow special interests to anonymously donate unchecked amounts of money that is then used to influence elections. This lack of transparency has in turn eroded accountability. In races where dark money groups are active, voters and constituents do not know who paid to support their elected representatives or, consequently, who their representatives are beholden to.

The rise of dark money spending has been well-documented at the federal level. Overall, political spending by section 501(c)(4) groups — the nonprofit type most commonly associated with dark money — was 115 times greater in 2016 than it was in 2006, the last year before Wisconsin Right to Life, and 45 times greater than it was in 2004, the last presidential election before Wisconsin Right to Life. States have seen a similar influx of anonymous spending. The Brennan Center examined a subset of states and found that, on average, dark money spending was 38 times greater in 2014 than it had been in 2006. Some of that money flowed through groups that are not only funded secretly, but also have close ties to the governors they worked to elect, potentially providing donors more direct influence.

Another avenue for donors to influence governors using secretly-funded nonprofits has received comparably less attention: groups with close ties to a governor already in office that spend money to advance that governor’s policy agenda or pet projects. This is not dark money spending in the classical sense, as these organizations are not solely involved in influencing elections. Instead, they are also spending to advance the agenda and/or elevate the status of the governor with whom they are linked. However, these shadow governance groups are similar to dark money nonprofits in that spending is uncapped and does not legally have to be disclosed, aiding officeholders while preventing voters and constituents from knowing who their elected officials rely on for fiscal support. Additionally, since spending by shadow governance groups is not covered by rules surrounding political contributions, the individuals behind shadow governance nonprofits can coordinate with the governors they are supporting.

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5 “Political Nonprofits (Dark Money).” Center for Responsive Politics.  

Dark Money Groups
Don't disclose donors
Spend to elect officeholders

Shadow Governance Groups
Don't disclose donors
Spend to support an already elected officeholder

A New Missouri, Inc., a nonprofit aligned with former Gov. Eric Greitens (R-MO), is an example of how closely and blatantly a shadow governance group can coordinate with a governor to bolster their political platform. The group was founded by Gov. Greitens’ campaign treasurer and run in part by his sister-in-law; Gov. Greitens’ senior adviser, Austin Chambers, also works with the group. In March 2017, Chambers told The Kansas City Star that there would be “coordination between ANM, the governor’s state office, and his campaign.”7 The group ran ads supporting the governor’s budget proposal and attacked Republican lawmakers who were critical of Gov. Greitens or his legislative priorities.8 The group also paid for travel to, and food and beverages for, a “campaign-style event” supporting Gov. Greitens, and provided Gov. Greitens’ airfare to travel between rallies.9

The group became embroiled in the Missouri state legislature’s investigation of then-Gov. Greitens after a former campaign staffer testified that the governor directed him to meet with donors who were interested in having their identities concealed.10 Gov. Greitens announced his resignation on May 29, 2018.11

CREW investigated all 50 state governors holding office as of January 31, 2017 for connections to nonprofit groups involved in politics or policy. Specifically, from February to October 2017, CREW looked for organizations that directly benefited the governor — by either bolstering their election prospects or supporting agenda items that could be concretely connected to the governor — that could also be tied to the governor through a combination of timing (established during or after the governor’s initial campaign), scope (operated predominately at the state level), personnel (led by staffers and board members with established connections to the governor) and other shared logistics (used resources such as office space and contractors that were also used by the governor’s campaign), and publicly reported ties (the governor makes appearances on behalf of the nonprofit, media reports directly link it to the governor).

While individual governor-affiliated nonprofits have previously been scrutinized by the local media, there has not been a systematic review of these groups across all 50 states until now. CREW found 30 nonprofit groups connected to 19 state governors: 24 shadow governance groups, one classic dark money group, and five groups that spent both on elections and to advance a sitting governor’s agenda.

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CREW found that shadow governance groups were created for a variety of purposes. Fourteen shadow governance groups supported a governor’s overall agenda, including the New Energy to Reinvent and Diversify Fund (NERD), which essentially functioned as an off the books source for additional discretionary funding for Gov. Rick Snyder’s (R-MI) office, and New Mexico Competes, which defended Gov. Susana Martinez’s (R-NM) policies, praising her handling of a Medicaid defrauding scandal and attacking a school district superintendent who opposed her education platform.

Twelve other shadow governance groups targeted more specific goals. In Tennessee, for example, Tennesseans for Student Success, closely tied to Gov. Bill Haslam (R-TN), sponsored a $137,000 ad buy to support the state’s version of the Common Core State Standards, which the governor had helped pass in his first term as governor. In New York, New Yorkers United Together advocated for Gov. Andrew Cuomo’s (D-NY) immigration policy, promoting his administration’s program that offers legal defense for immigrants. Indeed, nonprofits with close ties to governors work on issues as diverse as budget and pension reform, term limits, and education (see Table 1).

Five groups were created to fund a governor’s inaugural celebrations or to cover other transition costs. These types of groups provide an easy channel for special interests to donate tens of thousands of dollars to newly-established governors, often with limited or no disclosure. For example, in 2011, Real Georgia raised over $1.7 million for Gov. Nathan Deal’s (R-GA) first gala and disclosed its donors to the press. Of the 170 donors, at least 100 were affiliated with lobbyists at the state level. Utilities gave over $200,000 and insurance companies contributed $240,000. The group also received $25,000 from Koch Companies Public Sector, a lobbying arm of Koch Industries. Real Georgia did not disclose its donors for Gov. Deal’s 2015 inaugural festivities.

Once these types of groups are established, there is also little stopping them from pivoting to support the governor in other ways. In Michigan, for example, the group Celebrating the Power of Michigan was initially established to fund Gov. Rick Snyder’s (R-MI) 2011 inauguration. However, it also funneled money to other nonprofits working to support Gov. Snyder’s policy agenda and provide additional outside funding to his office. Similarly, in Maine, the group Maine People Before Politics was initially set up to fund Gov. Paul LePage’s (R-ME) transition into office, but later launched a series of ads to generate support for several of the governor’s policy proposals.

Some governors are actively and publicly involved with shadow governance groups. Gov. Bruce Rauner (R-IL) and Gov. John Bel Edwards (D-LA) appeared in advertisements paid for by shadow governance groups; Gov. Edwards, Gov. Chris Christie (R-NJ), and Gov. Roy Cooper (D-NC) have appeared at events and fundraisers held by them. Additionally, the staff of these nonprofits often have clear ties to the governor. For example, Tennesseans for Student Success, Education Voters of Idaho, and Real Georgia were run by campaign managers for Gov. Haslam, Gov. Butch Otter (R-ID), and Gov. Deal, respectively.

While shadow governance groups come in a variety of different shapes and sizes, what they have in common is a troubling lack of transparency while maintaining close ties to sitting governors. Seventy percent of identified groups did not voluntarily disclose any donor information to the public. Those that did disclose...

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15 Ibid.
released their records with plenty of caveats: Early Edge Action, aligned with Gov. Steve Bullock (D-MT), listed names and amounts for some donors, but not others; Maine People Before Politics, the transition committee for Gov. LePage, originally disclosed its donors (though not amounts), but stopped after the inauguration and its subsequent rebranding; and while Moving Michigan Forward (MMF) fully discloses its donors every quarter, much of its funding comes from other nonprofits connected to Gov. Snyder, including Making Government Accountable, which does not disclose its donors. Indeed, the inconsistency of these organizations with respect to their voluntary disclosures only underscores the importance of full transparency to ensure the accountability of public officials.

All in all, dark money groups and shadow governance groups alike allow state governors to gain from unlimited spending by anonymous sources. This unchecked spending means that special interests and deep-pocketed donors can exert more influence than ever before.
# TABLE 1: 30 dark money and shadow governance groups with ties to state governors

<table>
<thead>
<tr>
<th>State</th>
<th>Group</th>
<th>Governor</th>
<th>Party</th>
<th>Type of Support</th>
<th>Activities</th>
<th>Group Type</th>
</tr>
</thead>
<tbody>
<tr>
<td>Georgia</td>
<td>Georgia League of Education</td>
<td>Nathan Deal</td>
<td>Republican</td>
<td>Education</td>
<td>Allegedly used to promote the governor’s proposed constitutional amendment that will allow the state to take over failing schools.</td>
<td>Shadow Governance</td>
</tr>
<tr>
<td>Georgia</td>
<td>Georgia League of Georgia First Inc.</td>
<td>Nathan Deal</td>
<td>Republican</td>
<td>Education</td>
<td>Allegedly used to promote the governor’s proposed constitutional amendment that will allow the state to take over failing schools.</td>
<td>Shadow Governance</td>
</tr>
<tr>
<td>Georgia</td>
<td>Coalition for Georgia’s Future</td>
<td>Nathan Deal</td>
<td>Republican</td>
<td>Education, elections</td>
<td>Likely used to fund Governor Deal’s 2011 and 2015 legislative campaigns, both involving in education and education-related issues.</td>
<td>Shadow Governance</td>
</tr>
<tr>
<td>Georgia</td>
<td>Real Georgia</td>
<td>Nathan Deal</td>
<td>Republican</td>
<td>Inauguration</td>
<td>Bought airtime on state-run television, created a website to support Gov. Deal's education reform package.</td>
<td>Shadow Governance</td>
</tr>
<tr>
<td>Indiana</td>
<td>Imagine Indiana, Inc.</td>
<td>Eric Holcomb</td>
<td>Republican</td>
<td>Inauguration</td>
<td>Helped claim the governor's transition team.</td>
<td>Shadow Governance</td>
</tr>
<tr>
<td>Kansas</td>
<td>Road Map Solutions</td>
<td>Sam Brownback</td>
<td>Republican</td>
<td>Overall agenda, elections</td>
<td>Brought airtime during Gov. Brownback's re-election campaign, supported Gov. Brownback's school finance plan.</td>
<td>Dark Money, Shadow Governance</td>
</tr>
<tr>
<td>Louisiana</td>
<td>Rebuild Louisiana</td>
<td>John Bel Edwards</td>
<td>Democrat</td>
<td>Budget</td>
<td>Promoted various aspects of Governor Edwards' political platform, including Medicaid expansion and his budget plan.</td>
<td>Shadow Governance</td>
</tr>
<tr>
<td>Michigan</td>
<td>Celebrating the Power of Michigan</td>
<td>Rick Snyder</td>
<td>Republican</td>
<td>Overall agenda, elections</td>
<td>Initially created to fund Gov. Snyder's inauguration gala, then rebranded to focus on education and education-related issues.</td>
<td>Shadow Governance</td>
</tr>
<tr>
<td>Michigan</td>
<td>Making Government Accountable</td>
<td>Rick Snyder</td>
<td>Republican</td>
<td>Inauguration</td>
<td>Initially created to raise funds for Gov. Snyder to travel around the country, the nonprofit was used to further bolster candidates to other nonprofits linked to supporting Gov. Snyder's political agenda and fund his office.</td>
<td>Shadow Governance</td>
</tr>
<tr>
<td>Michigan</td>
<td>Moving Michigan Forward</td>
<td>Rick Snyder</td>
<td>Republican</td>
<td>Overall agenda</td>
<td>Advocacy and media strategy focused on educating voters about the governor's record and defending his administration.</td>
<td>Dark Money, Shadow Governance</td>
</tr>
<tr>
<td>Michigan</td>
<td>New Energy to Reinvent and Divest Funds</td>
<td>Rick Snyder</td>
<td>Republican</td>
<td>Overall agenda</td>
<td>Functional as an offshore source for additional donations funding for the governor's office. This included a policy that would allow for renewable energy sources to be used in the governor's office.</td>
<td>Shadow Governance</td>
</tr>
<tr>
<td>Missouri</td>
<td>A New Missouri</td>
<td>Eric Greitens</td>
<td>Republican</td>
<td>Overall agenda</td>
<td>Ran numerous ads attacking state lawmakers who were critical of Gov. Greitens' policies, and played a key role in the governor's re-election campaign.</td>
<td>Shadow Governance</td>
</tr>
<tr>
<td>Missouri</td>
<td>Committee for a New Missouri</td>
<td>Eric Greitens</td>
<td>Republican</td>
<td>Inauguration</td>
<td>Created to fund Gov. Greitens' 2017 inauguration festivities.</td>
<td>Shadow Governance</td>
</tr>
<tr>
<td>Montana</td>
<td>Early Edge Action</td>
<td>Steve Bullock</td>
<td>Democrat</td>
<td>Education</td>
<td>Paid for message attacking the benefits of Early Edge, Gov. Bullock's proposal to allow teachers to use loudspeakers in public schools.</td>
<td>Shadow Governance</td>
</tr>
<tr>
<td>Nevada</td>
<td>Nevada Gun Do Better</td>
<td>Brian Sandoval</td>
<td>Republican</td>
<td>Education</td>
<td>Convened a task force to support Gov. Sandoval's plan to increase taxes for education spending, used digital advertisements and social media to advocate for reform in Nevada's tax and education systems.</td>
<td>Shadow Governance</td>
</tr>
<tr>
<td>New Jersey</td>
<td>Committee for Our Children's Future</td>
<td>Chris Christie</td>
<td>Republican</td>
<td>Overall agenda</td>
<td>Paid for a series of ads attacking so-called “sanctuary cities” that were critical of Gov. Christie's policies.</td>
<td>Shadow Governance</td>
</tr>
<tr>
<td>New Jersey</td>
<td>Reform New Jersey</td>
<td>Chris Christie</td>
<td>Republican</td>
<td>Overall agenda</td>
<td>Paid for a series of ads attacking so-called “sanctuary cities” that were critical of Gov. Christie's policies.</td>
<td>Shadow Governance</td>
</tr>
<tr>
<td>New Mexico</td>
<td>New Mexico Competes, Inc.</td>
<td>Susan Martinez</td>
<td>Republican</td>
<td>Overall agenda</td>
<td>Ran an ad campaign supporting Gov. Martinez's handling of a Medicaid debate, focused on the governor's ability to pass legislation.</td>
<td>Shadow Governance</td>
</tr>
<tr>
<td>New York</td>
<td>New Yorkers United Together</td>
<td>Andrew Cuomo</td>
<td>Democrat</td>
<td>Budget, pension</td>
<td>Television and radio advertising supporting Gov. Cuomo's budget and proposed pension cut changes.</td>
<td>Shadow Governance</td>
</tr>
<tr>
<td>New York</td>
<td>Committee to Save New York</td>
<td>Andrew Cuomo</td>
<td>Democrat</td>
<td>Immigration</td>
<td>Paid for advertising promoting Gov. Cuomo's immigration policy.</td>
<td>Shadow Governance</td>
</tr>
<tr>
<td>North Carolina</td>
<td>Moving NC Forward</td>
<td>Roy Cooper</td>
<td>Democrat</td>
<td>Overall agenda</td>
<td>Held multiple events featuring Gov. Cooper and members of his administration to promote their reform packages.</td>
<td>Shadow Governance</td>
</tr>
<tr>
<td>Ohio</td>
<td>Balanced Budget Forever</td>
<td>John Kasich</td>
<td>Republican</td>
<td>Budget</td>
<td>Funded Gov. Kasich's travel for a multi-state tour to advocate for a balanced budget constitutional amendment.</td>
<td>Shadow Governance</td>
</tr>
<tr>
<td>Ohio</td>
<td>Two Paths America</td>
<td>John Kasich</td>
<td>Republican</td>
<td>Overall agenda, elections</td>
<td>Paid for advertising promoting the two paths policy.</td>
<td>Dark Money, Shadow Governance</td>
</tr>
<tr>
<td>Tennessee</td>
<td>Tennesseeans for Student Success</td>
<td>Bill Haslam</td>
<td>Republican</td>
<td>Education</td>
<td>Paid for a series of ads attacking state universities for their support of Gov. Haslam's education policy.</td>
<td>Shadow Governance</td>
</tr>
<tr>
<td>Tennessee</td>
<td>Tennessee Business Partnership</td>
<td>Bill Haslam</td>
<td>Republican</td>
<td>Overall agenda</td>
<td>Ran an ad campaign supporting Gov. Haslam's handling of the state's financial affairs, focused on the governor's budget proposal.</td>
<td>Shadow Governance</td>
</tr>
<tr>
<td>Wisconsin</td>
<td>Wisconsin Club for Growth</td>
<td>Scott Walker</td>
<td>Republican</td>
<td>Elections</td>
<td>Paid for a series of ad advocating for the governor's re-election.</td>
<td>Dark Money</td>
</tr>
</tbody>
</table>
METHODOLOGY

CREW investigated all state governors in office as of January 31, 2017. From February to October 2017, CREW identified groups of interest by searching news reports for a combination of each governor’s name and a set of relevant keywords, including “dark money,” “nonprofit,” “501(c)(4),” and “tax exempt.”

Next, CREW compiled additional information about each group from a variety of different sources, including organizational websites, public records, and reports by state-based government watchdog groups, including:

- Public website (if available)
- Official mission statement
- Tax status: All groups had one of three nonprofit tax status classifications:
  - 501(c)(3): Charitable organizations. These groups cannot participate in any political activities and can participate in a limited amount of lobbying.\(^{16}\)
  - 501(c)(4): Social welfare organizations. These groups can participate in some political activities, but politics cannot be their primary activity. They can also participate in an unlimited amount of lobbying.\(^{17}\)
  - 501(c)(6): Business leagues. These groups can participate in some political activities, but politics cannot be their primary activity. They can also participate in an unlimited amount of lobbying.\(^{18}\)
- Dates of activity: Dates of activity were determined by each group’s corporate business registration. However, it is important to note that organizations registered as “active” in their corporate filings may not currently engage with politics or policy.
- Type of support: These determinations were made by looking at nonprofits’ activities and materials, rather than their official mission statements. Type of support was classified into the following categories:
  - Overall agenda
  - Inauguration
  - Budget
  - Education
  - Elections
  - Other subject-specific topics, including taxes, immigration, and pension
- Ties to the governor: Direct connections between the individuals who established and/or manage the nonprofit and the governor. Direct involvement by the governor in either the creation of the nonprofit and/or its activities.
- Activities: Specific actions the nonprofit has taken to provide support for the governor.
- Other information: Other relevant groups and individuals associated with the nonprofit, including any evidence that they may have received favorable treatment from the governor.

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Donors and revenue (when available): Nonprofits are required to file annual tax reports which include gross revenue and expenditures. Consequently, this information was collected for organizations that were established before 2016 and thus have filed tax returns. Though donor information is not publicly released, some nonprofits voluntarily disclosed donors or had their donors disclosed by media reports. This information was also collected when available.

CREW analyzed all of this information to determine whether each nonprofit met two key characteristics of a shadow governance or dark money group: first, the group was unambiguously engaged in actions that benefitted a governor, such as supporting a governor’s campaign or working to pass governor’s favored policy proposal. Second, the group was not required to disclose donors.

Finally, CREW determined the extent to which the remaining nonprofits could be linked to the governor they were supporting. Groups were evaluated to be closely linked to sitting governors if they met at least three of the following four criteria:

- Articulated Ties: Do the governor and/or nonprofit openly admit affiliation with each other? Has the governor made appearances on behalf of the nonprofit? Does media reporting on the nonprofit directly link it to the governor?
- Personal Relationships: Do staffers of the nonprofit have past ties to the governor? Can the named board members of the nonprofit be directly linked to the governor?
- Timing: Was the nonprofit established after the governor began their campaign for office? (i.e., during the campaign, prior to inauguration, or after inauguration). In general, the scope of the research was confined to nonprofits lending support to governors currently in office or running for office. In a few cases, however, there was substantial evidence that individuals used nonprofits to their advantage prior to announcing their gubernatorial campaign, leading to exceptions.
- Locality: Does the nonprofit operate mainly within the state where the governor serves as chief executive?

This method produced a set of 30 groups tied to 19 state governors, each of which is discussed in detail below.
Table 2: Assessment Criteria Scoring for All Groups

<table>
<thead>
<tr>
<th>Group</th>
<th>Characteristics Necessary for Inclusion</th>
<th>Inclusion Requires 3 out of 4 Characteristics</th>
</tr>
</thead>
<tbody>
<tr>
<td>A New Missouri</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Alabama Council for Excellent Government</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Balanced Budget Forever (OH)</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Celebrating the Power of Michigan</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Committee for a New Missouri</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Committee For Our Children’s Future (NJ)</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Committee to Save New York</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Early Edge Action (MT)</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Education Voters of Idaho</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Georgia Leads</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Georgia Leads on Education</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Maine People Before Politics</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Making Government Accountable (MI)</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Moving Michigan Forward</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Moving North Carolina Forward</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Nevada Can Do Better</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>New Energy to Reinvent and Diversify Fund (MI)</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>New Mexico Competes</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>New Yorkers United Together</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Imagine Indiana</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Real Georgia</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Rebuild Louisiana</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Reform Jersey Now</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Road Map Solutions (KS)</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Tennesseans for Student Success</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Tennessee Business Partnership</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>The Coalition for Georgia’s Future</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Turnaround Illinois</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Two Paths America (OH)</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Wisconsin Club for Growth</td>
<td>X</td>
<td>X</td>
</tr>
</tbody>
</table>
Alabama: Former Governor Robert Bentley

Republican
Assumed office January 17, 2011
Resigned April 10, 2017, roughly halfway into his second term

Alabama Council for Excellent Government (ACEGov)

www.ACEGov.com/ (defunct)20

Type of group: Dark money/Shadow governance
Type of support: Overall agenda, elections
Tax status: 501(c)(4)
Active: February 18, 2015 – present21

Stated mission: “[T]o support Gov. Bentley in his efforts to solve real problems and to make Alabama greater, stronger and more excellent for all the hardworking men and women who call this great state our home.”22

Ties to the governor: Established by Cooper Shattuck, Gov. Bentley’s former legal adviser. Shattuck said the organization was formed at the governor’s request.23

Activities: ACEGov worked to support Gov. Bentley’s tax plan, which would have resulted in a $541 million tax increase, and planned to support his position on healthcare reform.24 The group commissioned a poll which showed Alabama Republicans’ support of tax hikes; the poll was sent to members of the Alabama legislature to raise support for the governor’s tax reform.25 The reform ultimately failed.26

ACEGov donated $2,500 to the Alabama Republican Executive Committee on August 19, 2015.27

ACEGov was involved in the scandal that led to Gov. Bentley’s resignation. In March 2016, ex-Alabama Law Enforcement Agency Secretary Spencer Collier, who had been terminated from his position the day before,

23 Ibid.
25 LaPorta, “Bentley Admin. pushes poll declaring Alabama Republicans want tax increases, not spending cuts.”
27 Gore, “Gov. Bentley’s ‘dark money’ group: Alabama Council for Excellent Government donates $2,500 to GOP.”
alleged in a press conference that Gov. Bentley had an affair with Rebekah Mason.28 Mason served as Gov. Bentley’s highly influential political adviser, but she was not on the state payroll. Unnamed sources told AL.com, the website of the Birmingham News, that she was being paid an undisclosed amount through ACEGov.29

After news of Gov. Bentley’s alleged affair became public, ACEGov took steps to lower its own public profile. The group’s website was disabled following the scandal. While Shattuck denied that the governor’s actions were the cause, explaining that an expired web contract was actually the culprit, the website remained defunct as of January 2018.30 ACEGov’s Facebook page and Twitter account were also closed.31

Shattuck also sought to distance ACEGov from the governor after the scandal broke, saying that “[t]he entity was formed to support the Governor’s legislative initiatives; however, the Governor does not manage or direct this entity. This is not a public entity, and it is not a governmental entity. Therefore, no public funds have been sought or used by this entity, nor has it sought to fulfill any public or governmental purpose.”32

Despite Shattuck’s efforts to separate ACEGov from Gov. Bentley, the group was implicated in the governor’s illicit activities. ACEGov was named as a co-defendant, alongside Gov. Bentley, in at least two lawsuits. Ex-Alabama Law Enforcement Agency Secretary Collier filed a lawsuit claiming several violations, including wrongful termination.33 Wendell Ray Lewis, Gov. Bentley’s ex-security chief, also filed a wrongful termination suit against Gov. Bentley, including ACEGov as a defendant.34 In September 2016, Richard Raleigh, the attorney representing ACEGov in the Collier lawsuit, told WHNT News 19 that the nonprofit “was considering corporate dissolution.”35 The extent of ACEGov’s ties to Gov. Bentley’s administration was further revealed over the course of preliminary impeachment proceedings. As part of efforts to cooperate with Special Counsel for the Alabama House Judiciary Committee Jack Sharman’s impeachment investigation, the Office of the Governor turned over a “Suggested ACEGov Call List,” which was sent to Gov. Bentley and members of his staff from one of his chief fundraisers.36 On April 7, 2017, Special Counsel Sharman released a report investigating whether Gov. Bentley should be impeached. ACEGov appeared 48 times in the 131-page report.37


35 Kumbroch, "Pulling back the curtain on Governor Bentley's dark money organization."


37 Special Counsel Jack Sharman, "The impeachment investigation of Governor Robert Bentley: Pre-hearing submission of Special Counsel."
Gov. Bentley resigned April 10, 2017, the same day that an Alabama legislative committee started hearings to impeach him.\textsuperscript{38}

On April 11, 2017, a circuit judge ruled that ex-Security Chief Lewis’ wrongful termination lawsuit against Bentley could proceed with ACEGov as a co-defendant.\textsuperscript{39}

**Donor disclosure and revenue:** ACEGov does not disclose its donors.

During Gov. Bentley’s impeachment investigation, Special Counsel Sharman “requested information from ACEGov, including the identity of the donors and attempted to serve ACEGov through its counsel,” but the “service was refused.”\textsuperscript{40} Indeed, while text messages between Gov. Bentley and others about ACEGov were provided, they were “almost entirely blacked out.”\textsuperscript{41}

Lawyers in ongoing lawsuits attempting to determine who donated to ACEGov have been largely unsuccessful as of April 2017. According to ex-Alabama Law Enforcement Agency Secretary Spencer Collier, a complainant in one of the lawsuits, "I don't think we know anything more about ACEGov than we did a year ago.”\textsuperscript{42}

In ACEGov’s 2015 filings, it reported a total revenue of $90,600.\textsuperscript{43}

\textsuperscript{40} Ibid.
\textsuperscript{41} Ibid.
\textsuperscript{42} Ibid.
\textsuperscript{43} Kumbroch, "Pulling back the curtain on Governor Bentley's dark money organization."
Georgia: Governor Nathan Deal

Republican
Assumed office January 10, 2011
Currently serving second term, which will end January 2019; two consecutive term limit

Coalition for Georgia’s Future, Inc. (CGF)

No public website
Type of group: Dark money/Shadow governance
Type of support: Elections, education
Tax status: 501(c)(4)
Active: July 30, 2014 – December 7, 2016

Stated mission: “Educating Georgians (and all Americans) about the importance of investing in public policy choices that promote economic freedom, individual liberty, greater educational choice and increased opportunity for all.”

Ties to the governor: According to Governing magazine, the nonprofit was founded by Gov. Deal’s allies. Chip Lake, the director of CGF as of May 24, 2017, was also the head of the Georgia Victory Fund, a super PAC established to assist Gov. Deal in his 2014 reelection bid.

Activities: CGF spent about $200,000 on ads to support Gov. Deal’s 2014 election campaign. In 2015, Gov. Deal championed a school takeover plan — the proposal, which was a 2016 ballot question, would have created a new statewide school district to “take control of some of Georgia’s most distressed schools.” CGF created an ad to support the plan. The proposal failed, 60% to 40%.

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49 Bluestein, “School Takeover Plan’s Supporters, Opponents Now Turn to Georgia Voters.”
Other information: In its IRS filing for 2014, CGF also reported a $225,000 grant to American Freedom Builders, a nonprofit with ties to Gov. John Kasich (R-OH) that has spent money to promote Ohio political candidates.52

Donor disclosure and revenue: CGF does not disclose its donors.

In 2014, CGF reported a revenue of $665,000 and expenditures of $596,472.53 CGF reported $0 in revenue in 2016 and $0 in expenditures in 2016; it was deactivated at the end of the year.54

Real Georgia, Inc.

No public website

Type of group: Shadow governance

Type of support: Inauguration

Tax status: 501(c)(4)

Active: Nov. 8, 2010 – March 9, 2016

Stated mission: “To organize inauguration [sic] and transition committee activities for the newly elected Governor of the state of Georgia.”56

Ties to the governor: Real Georgia was originally established as the Gubernatorial Inauguration and Transition Committee of 2011 Inc. to fund Gov. Deal’s inaugural gala. Tom Willis was Real Georgia’s CEO.57 Willis began his career as an intern in then Congressman Deal’s D.C. office when he was serving in the House of Representatives, then served as Gov. Deal’s special assistant and local government liaison. Willis also worked as Gov. Deal’s campaign manager for both his initial 2010 race and 2014 re-election.58


Activities: Real Georgia was used to fund Governor Deal’s 2011 and 2015 inaugurations, covering both swearing-in ceremonies and both galas, as well as salaries, security, and other costs.\(^{59}\) Real Georgia was dissolved shortly after the 2015 inaugural events. According to Willis, “[o]ur intention was always to dissolve Real Georgia following the inauguration, and we did so in a timely manner in full compliance with all reporting requirements for both federal and state laws.”\(^{60}\)

Donor disclosure and revenue: While Real Georgia has disclosed its donors in the past, it did not after the 2015 inauguration and gala.\(^{61}\)

In 2011, Real Georgia raised over $1.7 million for Governor Deal’s first gala and disclosed its donors to the press.\(^{62}\) Of 170 donors, at least 100 were affiliated with lobbyists at the state-level. Utilities gave over $200,000 and insurance companies contributed $240,000. The group also received $25,000 from Koch Companies Public Sector, a lobbying arm of Koch Industries.\(^{63}\) Real Georgia did not publicly disclose the donors of the second gala. An Atlanta Journal-Constitution investigation linked about $162,000 in contributions or ticket sales to Real Georgia by reviewing reported expenses of lawmakers and PACs. The 26 identified donors included four lawmakers, the Georgia Republican Party, the Georgia Chamber, the Georgia Trial Lawyer Association PAC, United Health Services, AT&T, and Lockheed Martin. The nonprofit raised $1.4 million for the 2015 gala.\(^{64}\)

### Georgia Leads, Inc. (GL)/Georgia First, Inc. (GFI)

No public website

**Type of group:** Shadow governance

**Type of support:** Education

**Tax status:** 501(c)(4)

**Active:** February 18, 2015 – present \(^{65}\)

**Stated mission:** Georgia Leads “will spearhead initiatives of critical importance to Georgia, including passage of the 2016 Opportunity School District ballot amendment.”\(^{66}\)

**Ties to the governor:** Tom Willis left his position in the governor’s office to run the organization.\(^{67}\) Willis began his career as an intern in then Congressman Deal’s D.C. office when he was serving in the House of

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\(^{61}\) Ibid.


\(^{63}\) Ibid.


\(^{67}\) Ibid.
Representatives, then served as Gov. Deal’s special assistant and local government liaison. Willis also worked as Gov. Deal’s campaign manager for both his initial 2010 race and 2014 re-election.68

Willis was also the CEO of Real Georgia.69 When the governor’s office was asked to comment on recent Opportunity School District backlash, they forwarded the request to Willis.70

**Activities:** While not much is known about the nonprofit’s activities, it allegedly planned to promote the governor’s proposed constitutional amendment that would allow the state to take over failing schools.71 The plan narrowly passed both chambers and was placed on the ballot in November 2016.72 When asked, Willis stated that the goal of Georgia Leads is “to push for public policies across Georgia that will advance a pro-jobs and pro-family agenda.”73 The measure ultimately failed.74

The organization changed its name to Georgia First, Inc. on March 1, 2017.75

**Donor disclosure and revenue:** GL/GFI does not publicly disclose its donors. An *Atlanta Journal-Constitution* investigation revealed the identities of contributors who gave a total of $150,000. Donors included AT&T, the Georgia retail store lobby, well-connected lobbying firm McGuireWoods, and the Hospital Corporation of America.76

The group also received donations from multiple beverage distributors, including the beer distributors lobby and Georgia Crown Distributing. As *The Atlanta Journal-Constitution* noted, beer distributors have been fighting Georgia’s craft beer brewers over the existing distribution system, which prevents craft beer brewers from selling directly to customers who visit their breweries.77

Revenue is not yet reported.

**Georgia Leads on Education (GLoE)**

www.gaopportunity.org/ (defunct)78

*Type of group:* Shadow governance

*Type of support:* Education

*Tax status:* 501(c)(3)

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76 Ibid.

Active: May 21, 2015 - present


Ties to the governor: The organization’s CEO is Benjamin Keane as of November 9, 2017, who served as co-counsel for Gov. Deal and his gubernatorial campaign committee.

Activities: While not much is known about the nonprofit, it allegedly planned to promote the governor’s proposed constitutional amendment that would allow the state to take over failing schools. The plan narrowly passed both chambers and was placed on the ballot in November. The measure ultimately failed.

Donor disclosure and revenue: GLoE does not disclose its donors. Revenue is not yet reported.

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80 “GA Leads | In Development,” Georgia Leads on Education (stored on Wayback Machine).


82 “GA Leads | In Development,” Georgia Leads on Education (stored on Wayback Machine). Because GLOE is 501c3 educational organization, it should be limited in the amount of activity it can undertake to support a ballot initiative.


Idaho: Governor C.L. “Butch” Otter

Republican
Assumed office January 1, 2007
Currently serving third term, which will end January 2019; no term limit

Education Voters of Idaho, Inc. (EVI)85

No public website
Type of group: Shadow governance
Type of support: Education
Tax status: 501(c)(4)
Active: Aug. 16, 2012 – Dec. 20, 201386

Stated mission: “To serve as an information resource for questions about education reform issues and legislation in Idaho and to promote education reform through lobbying and general advocacy.”87

Ties to the governor: Debbie Field, Gov. Otter’s campaign manager, was on EVI’s founding board of directors.88 Gov. Otter and his wife solicited donations for EVI, including $200,000 from former New York City Mayor Michael Bloomberg.89

Activities: The Students Come First reform package was passed by the Idaho Legislature in 2011.90 Spearheaded by Idaho Superintendent of Public Instruction Tom Luna, reforms included new limits to the collective bargaining rights of Idaho teachers, performance-based merit pay, and a phasing out of the tenure system.91

The package was quickly challenged, with opponents gathering enough signatures to put the Students Come First initiatives on the November 2012 ballot, essentially turning the already passed legislation into a referendum question.92 Because the Students Come First package was passed through a series of three bills, the ballot had three propositions — Propositions 1-3 — that, if rejected, would have struck down the package in its entirety.93

85 EVI also did business as Engage Idaho.
93 “Idaho Voters Resoundingly Reject Propositions 1,2 And 3.”
EVI spent over $600,000 in campaign ads and other political activity supporting the package.94 In its financial statements, the group lists the expenditures as “survey of public opinion, promotion of education reform proposals on state ballot, dissemination of information to the public detailing the issues and financial support to like-focused organizations.”95 EVI gave $400,350 of that $600,000 to Parents for Education Reform (PER), which in turn spent at least a portion of the money to pay for a television ad supporting the laws.96 EVI and PER share both addresses and leaders.97 EVI also spent $126,169 on “voter programs.”98

The Students Come First package was struck down after all three ballot measures resoundingly failed by margins of 14% to 34%.99

Donor disclosure and revenue: EVI was established as a 501(c)(4), which would allow it to keep its donors secret; however, the group was forced to disclose its contributors in October 2012.100 Secretary of State Ben Ysursa filed suit against EVI, arguing that voters would “suffer irreparable harm if they couldn't find out who put up the money for the ads.” The judge, citing Idaho’s Sunshine initiative, agreed that EVI was a political committee under state law, with an obligation to publicly disclose its donors.101

EVI collected more than $641,000 in donations. The two largest donors were Albertson’s supermarket heir Joseph B. Scott and Michael Bloomberg, who at the time was serving his third term as mayor of New York City. Scott, whose foundation ran newspaper ads promoting the original Students Come First reform plan in 2011, donated $250,000. Bloomberg donated $200,000.102

Other donors included the Republican Governors Public Policy Committee, which donated $50,000, and Wyoming’s Foster Friess, the financier of Rick Santorum’s super PAC, who donated $25,000. Oregon’s John D. Bryan, a top funder of conservative nonprofit the Club for Growth, Intermountain Gas Co., Idaho Forest Group, M3 Eagle LLC, and Clear Springs Foods of Buhl each gave $10,000. Out of 25 donors, ten were from out-of-state. Their total donations of $320,000 nearly matched the in-state donations of $321,000. Out of the 25 donors, 12 were organizations or businesses.103

95 “Form 990: Education Voters of Idaho DBA Engage Idaho” (2012).
100 “Nonprofit must disclose donors to campaign ads, Idaho judge rules.”
101 Ibid.
102 Russell, “NY mayor among secret donors to Idaho school campaign.”
103 Ibid.
Illinois: Governor Bruce Rauner

Republican
Assumed office January 12, 2015
Currently serving first term, which will end January 2019; no term limit

Turnaround Illinois, Inc. (TI)
www.fixillinois.com (defunct)\textsuperscript{104}
Type of group: Shadow governance
Type of support: Overall agenda
Tax status: 501(c)(4)
Active: April 24, 2015 - March 17, 2016\textsuperscript{105}

Stated mission: “Advancing social welfare by promoting policies, ideas, and/or legislation to address major problems burdening Illinois and stifling economic growth and freedom; conducting other lawful activities.”

Ties to the governor: The \textit{Chicago Tribune} billed TI as “an organization controlled by Gov. Bruce Rauner.”\textsuperscript{106} In its 2015 tax return, TI listed Gov. Rauner as its “controlling principal” and Citizens for Rauner, Gov. Rauner’s candidate political committee, as a related organization.\textsuperscript{107}

Activities: TI bought extensive ad time to promote a constitutional amendment to create term limits. As of August 2016, the nonprofit had booked over $1 million “in broadcast, satellite and cable TV ads.”\textsuperscript{108} Gov. Rauner appears at the end of the advertisement TI ran, informing watchers that they should sign a petition for term limits.\textsuperscript{109}

The \textit{Chicago Tribune} opined that the issue was “pretty much solely political and more than a bit phony.”\textsuperscript{110} Since Gov. Rauner’s own popularity was flagging at the time of TI’s ad campaign, the \textit{Tribune} speculated that pushing for term limits could be a safe way for Gov. Rauner to boost his polling numbers in advance of his 2018 reelection campaign.\textsuperscript{111} The Illinois Senate passed term limits for its legislators on January 11, 2017.\textsuperscript{112} In the months after the vote, the TI website was repurposed to promote the “Rauner Balanced Budget Plan,”

\begin{footnotesize}
\begin{enumerate}
\item \textsuperscript{105} The last date that Turnaround Illinois filed paperwork was March 16, 2016; however, the website fixillinois.com remained active until at least October 2017 (https://www.web.archive.org/web/20171015021553/https://fixillinois.com/). The group’s status is now listed as dissolved. See DC.gov, Department of Consumer and Regulatory Affairs Business Filings Search, “Turnaround Illinois, Inc. - Initial File Number: N00005185366,” https://www.corponline.dcrade.gov/BizEntry.aspx?ViewEntryData&entID=4153298 \(\text{Accessed September 6, 2017}\).
\item \textsuperscript{108} Miller, “Rauner looks to improve poll numbers with term limits media blitz.”
\item \textsuperscript{109} Ibid.
\item \textsuperscript{110} Ibid.
\item \textsuperscript{111} Ibid.
\end{enumerate}
\end{footnotesize}


**Donor disclosure and revenue:** TI does not publicly disclose its donors. It received $1 million from the Republican Governors Public Policy Committee.\footnote{“Form 990: Turnaround Illinois, Inc.” (2015).} It reported $2.5 million in revenue in 2015.\footnote{“Form 990: Turnaround Illinois, Inc.” (2015).}
Indiana: Governor Eric Holcomb

Republican
Assumed office January 9, 2017
Currently serving first term, which will end January 2021; two consecutive term limit

Imagine Indiana, Inc. (II)
www.nextlevelindiana.com (defunct)\(^{120}\)
Type of group: Shadow governance
Type of support: Inauguration
Tax status: 501(c)(4)
Active: November 9, 2016 – present\(^{121}\)

Stated mission: II was “formed to manage [Gov. Holcomb’s] transition and inaugural activities.”\(^{122}\)

Ties to the governor: II was formed by William W. Barrett, who donated $5,400 to Gov. Holcomb’s campaign.\(^{123}\) As of November 9, 2016, its directors include Kyle Hupfer, a “trusted longtime friend of [Gov.] Holcomb” and co-chair of Gov. Holcomb’s transition board who Gov. Holcomb also nominated as Indiana Republican Party chief;\(^{124}\) Earl Goode, Gov. Holcomb’s chief of staff;\(^{125}\) and Jeff Knight, who also served on Gov. Holcomb’s transition board.\(^{126}\)

Activities: II, formerly known as Next Level Indiana, Inc., was created the day after Gov. Holcomb won the 2016 gubernatorial race.\(^{127}\) Taking Indiana to the “next level” is a catchphrase for Gov. Holcomb; it was a repeated theme of his first State of the State address, where he also announced the creation of the Next Level Indiana Fund.\(^{128}\) In April 2017, II retweeted a Twitter ad from American Policy Coalition, a nonprofit

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previously associated with Missouri Governor Eric Greitens, advocating for Gov. Holcomb’s infrastructure plan.\textsuperscript{129}

II changed its name to Imagine Indiana, Inc. on July 11, 2017.\textsuperscript{130}

**Donor disclosure and revenue:** II has not disclosed its donors. Its revenue has not yet been reported to the IRS.

\textsuperscript{129} Niki Kelly, “Nonprofit backs roads plan,” *The Journal Gazette (Indiana)*, Apr. 19, 2017,  

\textsuperscript{130} “Certificate of Amendment: Next Level Indiana, Inc.” State of Indiana, Office of the Secretary of State.
Kansas: Governor Sam Brownback

Republican
Assumed office January 10, 2011
Currently serving second term, which will end January 2019; two consecutive term limit

Road Map Solutions, Inc. (RMS)

No public website
Type of group: Dark money/Shadow governance
Type of support: Overall agenda, elections
Tax status: 501(c)(4)
Active: December 6, 2011 - present

Stated mission: “Research public policy and public attitudes and report to the public the advancements made toward Kansas Governor Sam Brownback’s Road Map for Kansas.”

Ties to the governor: David Kensinger, the group’s president as of RMS’ 2016 tax filings, left his position as Gov. Brownback’s chief of staff to oversee RMS. Trella Anderson, the group’s director as of RMS’ 2016 tax filings, was Gov. Brownback’s treasurer during his campaign; her husband, T.C. Anderson, is also listed as a director in RMS’ 2016 tax filings and is the treasurer of the Kansas GOP.

Activities: RMS was named for the policy “road map” platform Gov. Brownback ran on in 2010. The Road Map PAC, which T.C. Anderson also runs, is Gov. Brownback’s personal leadership committee. RMS bought $82,000 worth of airtime in 2014 during Gov. Brownback’s re-election campaign, using the ads to “emphasize economic growth in Kansas” and Gov. Brownback’s “policy proposals for education.” RMS ran an ad praising Gov. Brownback for a new school finance bill after it cleared the legislature with only Republicans voting in approval.

Other information: The nonprofit’s chairman has been implicated in a federal investigation involving Gov. Brownback’s office and accusations of influence peddling. In 2014, Parallel Strategies, a lobbying firm co-founded by RMS chairman David Kensinger, was the subject of an inquiry by the FBI that also implicated

137 Burns, “Brownback TV ads to air.”
Gov. Brownback’s office. A *Topeka Capital-Journal* article covering the inquiry noted that “[q]uestions center on whether Brownback representatives pressured companies or organizations to hire specific lobbying firms or whether entities that showed inadequate deference were targeted for political or financial punishment.”¹³⁹ The outcome of the investigation has yet to be reported.

**Donor disclosure and revenue:** RMS does not publicly disclose its donors. RMS reported a total revenue of $115,780 in 2016.¹⁴⁰

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Louisiana: Governor John Bel Edwards

Democrat
Assumed office January 11, 2016
Currently serving first term, which will end January 2020; two consecutive term limit

Rebuild Louisiana

www.rebuildlouisiana.com

Type of group: Shadow governance
Type of support: Budget
Tax status: 501(c)(4)
Active: February 16, 2016 – present

Stated mission: “Tell the legislature to work with the Governor to find responsible solutions that combine reasonable cuts with the new revenue necessary to save higher education, critical healthcare services, and TOPS.”

Ties to the governor: Mary Olive Pierson, director of Rebuild Louisiana as of February 2, 2017, represented Gov. Edwards in a case that reviewed his gubernatorial authority in passing an executive order banning discrimination based on sexual orientation and gender identity. Renee Lapeyrolerie, another director of Rebuild Louisiana as of February 2, 2017, was selected by then Governor-elect Edwards to serve on the newly-formed Higher Education Transition Committee in 2015. Gov. Edwards spoke at a fundraiser for Rebuild Louisiana in May 2016, which was attended by supporters of his gubernatorial campaign; his press secretary said that “[t]he governor was there to offer his support for the organization and their goals.” Rebuild Louisiana’s television ads were created by Jared Arsement, who also created Gov. Edwards’ videos during his gubernatorial campaign. Gov. Edwards also appeared in an ad the group released supporting his budget plan, which was retweeted by his spokesman.

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146 Ibid., “Group raises money”
Activities: Rebuild Louisiana ran a TV ad praising Medicaid expansion in Louisiana, a policy enacted by Gov. Edwards. The group also sent mail fliers and paid for robocalls as well as a digital ad campaign to influence lawmakers on budget and tax issues during the second special session of the state legislature in 2016.148

In January 2017, Gov. Edwards was featured in a Rebuild Louisiana online ad, listing major accomplishments during his first year in office. Among other state issues, Gov. Edwards touted stabilizing the budget, securing federal funding for flood damages, and the benefits of Medicare expansion.149 In April 2017, Gov. Edwards again partnered with Rebuild Louisiana to air a TV and digital ad supporting his budget plan.150

Donor disclosure and revenue: Rebuild Louisiana does not disclose its donors. However, The Advocate interviewed attendees of the organization’s May 2016 fundraiser, several of whom went on the record as having donated to the nonprofit. Some of the notable donors who attended the event were lobbyists, including Pete Martinez of the Pharmaceutical Research and Manufacturers of America; Bud Courson and Jim Nickel, who represent a broad roster of clients including AT&T and the Coushatta Tribe of Louisiana; Alton Ashy, representing the video poker industry; and trial attorneys Ravi Sangisetty and Dan Foley.151

Its 2016 revenue has not yet been reported to the IRS. The attendees of the May 2016 fundraising event donated at least $5,000 apiece. 152

151 Ibid., “Group raises money”
152 Ibid., et al
Maine: Governor Paul LePage

Republican
Assumed office January 1, 2011
Currently serving second term, which will end January 2019; two consecutive term limit

Maine People Before Politics (MPBP)

www.mainepeoplebeforepolitics.com
Type of group: Shadow governance
Type of support: Transition, budget
Tax status: 501(c)(6)\(^{153}\)
Active: November 9, 2010 – present\(^{154}\)

Stated mission: “To ensure the people of Maine are informed about issues related to their government’s priorities”\(^{155}\)

Ties to the governor: MPBP was originally known as LePage Transition 2010.\(^{156}\) Jason Savage, a LePage campaign staffer, was MPBP's director; he has since left the group to become the executive director of the Maine Republican Party.\(^{157}\) Lauren LePage, Gov. LePage’s daughter, was the executive director of MPBP from January 2015 to June 2017.\(^{158}\)

Activities: MPBP was originally Gov. LePage’s 2010 transition fund. Its name was changed from LePage Transition 2010 to Maine People Before Politics in 2011.\(^{159}\)

After its rebranding, MPBP launched a series of ad campaigns to support various components of Gov. LePage’s platform. In April 2012, the group aired an ad criticizing Gov. LePage’s predecessor and expressing support for Gov. LePage’s plan to repay the $484 million debt the state of Maine owed its hospitals. The group also created a companion online petition.\(^{160}\) The debt was successfully paid off in September 2013.\(^{161}\)

In June 2013, MPBP launched a television ad campaign to pressure lawmakers to oppose tax increases. After

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\(^{153}\) U.S. Department of the Treasury, Internal Revenue Service, “Form 990: Maine People Before Politics”
http://990s.foundationcenter.org/990_pdf_archive/273/273923887/273923887_201510_990O.pdf (2014);
While MPBP is registered as a 501(c)(6), by all appearances and actions MPBP acts as a 501(c)4. It is not a trade association and does not have a dues-paying membership.

\(^{154}\) Search Corporate Names, “Information Summary: Maine People Before Politics”
State of Maine, Office of the Secretary of State.

\(^{155}\) Ibid.

\(^{156}\) Mike Tipping, “LePage’s Dark Money Political Operation,” The Tipping Point: Bangor Daily News, Apr. 04, 2013,

\(^{157}\) Ibid., “LePage’s Dark Money”


\(^{159}\) U.S. Department of the Treasury, Internal Revenue Service, “Form 990: Maine People Before Politics”

http://www.bangordailynews.com/2013/06/10/politics/state-house/lepage-supporters-launch-ad-opposing-budget-deal/

\(^{161}\) Alanna Durkin, “Maine pays off $500M debt owed to hospitals,” Modern Healthcare (AP), Sept. 18, 2013,
http://www.modernhealthcare.com/article/20130918/INFO/309180984
Gov. LePage threatened to veto the budget deal in his weekly radio message, MPBP purchased $14,000 in advertising in Portland and Bangor; it was estimated that the statewide ad buy was worth $30,000 - $35,000. In June 2015, the group paid for a series of robocalls featuring Gov. LePage’s daughter, Lauren LePage, criticizing Republican senators for their support of a bipartisan budget.

**Donor disclosure and revenue:** While Gov. LePage initially disclosed contributors to the LePage Transition 2010 fund — though not the amounts they gave — MPBP has not disclosed any donors since then.

Donors to the LePage Transition 2010 fund were almost all corporations and lobbyists. LogistiCare Solutions, LLC, a Georgia-based medical transportation company that did not have business in Maine before Gov. LePage took office donated to the fund; they have since won a $50 million contract to provide non-emergency transportation to Medicaid patients. Another contributor was Mallinckrodt, a company with a vested interest in preventing chemical cleanup: Mallinckrodt is the former owner of a plant responsible for dumping mercury and other chemicals into Maine’s Penobscot River. The business is now under court mandated orders to clean the river.

MPBP reported revenue of $1,167 in its 2016 tax return.

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162 Ibid., “LePage supporters launch ad”
163 Ibid., “Political group’s calls”
165 Ibid., “Mike Tipping: ‘Yes’ on”
166 Ibid., et al
Michigan: Governor Rick Snyder
Republican
Assumed office January 1, 2011
Currently serving second term, which will end January 2019; two term limit

Celebrating the Power of Michigan, Inc. (CPM)
No public website
Type of group: Shadow governance
Type of support: Inauguration, overall agenda
Tax status: 501(c)(4)
Active: November 17, 2010 – present

Stated mission: “To promote the social welfare in the state of Michigan, including engaging in activities to educate the public and elected leaders in the state of Michigan, and activities necessary for the preparation of the governor-elect of the state of Michigan to prepare for and assume the office of governor.”

Ties to the governor: Originally established to fund Gov. Snyder’s inauguration. Rich Baird, the president/director of CPM, has worked for Gov. Snyder as a top aide since 2011. Originally paid by the New Energy to Reinvent and Diversify Fund, another nonprofit with ties to Gov. Snyder, Baird was added to the state payroll in 2013. Linda Gobler, CPM’s secretary/director, was appointed to the Michigan Civil Rights Commission by Gov. Snyder. Patricia Mooradian, secretary/director through October 31, 2012, was appointed to the Central Michigan University Board of Trustees by Gov. Snyder.

Activities: CPM was initially created to fund Gov. Snyder’s inauguration gala. After the inaugural events, however, a large portion of the money was funneled to other nonprofits linked to supporting Gov. Snyder’s policy agenda and funding his office. For the 2011 event, CPM raised $1.4 million and spent $301,667 on the inauguration itself; another $900,000 went to New Energy to Reinvent and Diversify (NERD), another nonprofit established by Gov. Snyder. For the 2015 event, CPM raised about $837,000 and spent $480,000.
on the inauguration itself. Another $350,000 went to Moving Michigan Forward (MMF), the nonprofit founded to replace NERD. CPM was MMF’s primary donor in 2015, donating 85% of its revenue for the year.

**Donor disclosure and revenue:** Donors were listed on the programs for both Gov. Snyder’s 2011 and 2015 inaugurations, as well as on the now defunct inauguration websites. Donors to the 2015 inauguration included the Amway Corporation, Anheuser-Busch Companies, Delta Air Lines, Ford Motor Company, General Motors, the Michigan Chamber of Commerce, Microsoft, and UnitedHealth Group. Neither the programs nor the websites disclosed how much each donor contributed.

### New Energy to Reinvent and Diversify Fund (NERD)

**No public website**

**Type of group:** Shadow governance  
**Type of support:** Overall agenda  
**Tax status:** 501(c)(4)  
**Active:** February 4, 2011 – present

**Stated mission:** “To operate exclusively for the promotion of civic action and social welfare by promoting the common good and general welfare of the residents of, and visitors to the state of Michigan. To support public policies on the federal, state, and local levels, that will bring about civic betterments and social improvements to Michigan residents. To support programs aimed at improving Michigan’s business climate and employment opportunities. To encourage and advocate citizen participation in political, civic and governmental events and associated activities. To support activities and programs that improve the quality and effectiveness of government for the state of Michigan. To promote charitable causes, including lessening the burdens of government in the state of Michigan. To receive and administer funds to sponsor, conduct research, secure goods and services, or to hold events in conjunction with the promotion of these purposes.”

**Ties to the governor:** Gov. Snyder established NERD with the stated aim of “lessening the financial burdens of government in the state of Michigan.” The acronym “NERD” was a homage to Gov. Snyder’s

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179 Paul Egan, "Snyder fund still collects cash from undisclosed donors.


nickname, “one tough nerd.”

David Nicholson, former vice chairperson of NERD, was appointed to the Wayne State University Board of Governors by Gov. Snyder. Brad Canale, former secretary/treasurer, was appointed to the Michigan Natural Resources Trust Fund Board by Gov. Snyder. Richard DiBartolomeo, former assistant secretary/treasurer in 2012, was Gov. Snyder’s former campaign aide and one of two paid NERD officers.

Activities: NERD essentially functioned as an off-the-books source for additional discretionary funding for the governor’s office. Rich Baird, one of Gov. Snyder’s top aides, was paid by NERD. NERD also covered the $4,200 monthly rent of Detroit Emergency Manager Kevyn Orr. The nonprofit paid to upgrade an auditorium in the governor’s office, bought an alarm system for his private residence and covered travel expenses for his staff.

In October 2013, activist Robert Davis filed suit against NERD in an attempt to force the nonprofit to disclose its donors. While NERD was already in the process of shutting down, the judge extended an order to prevent the destruction of any documents. Gov. Snyder testified under oath that he did not know who donated to NERD. NERD closed shortly afterwards: Snyder’s spokesperson explained that it had “become an unnecessary distraction.”

Donor disclosure and revenue: NERD did not publicly disclose its donors. Company documents revealed that CVS donated $1,000 to NERD in March 2012. In 2013, Detroit Emergency Manager Kevyn Orr awarded CVS a $60 million pharmacy contract.

In 2011, NERD raised over $1.3 million. In 2013, it raised $513,000.

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183 "Snyder appoints David Nicholson to Wayne State University Board of Governors," Office of Governor Rick Snyder, Feb. 4, 2013 http://www.michigan.gov/snyder/0,4668,7-277--294275--,00.html. CREW has been unable to definitively confirm that the David Nicholson who was appointed to the Wayne State University board is the same David Nicholson associated with NERD.

184 Ryan J. Stanton, "Gov. Rick Snyder appoints Ann Arbor’s Brad Canale to Michigan Natural Resources Trust Fund Board," Ann Arbor News, Nov. 11, 2012. http://www.annarbor.com/news/gov-rick-snyder-appoints-ann-arbors-brad-canale-to-michigan-natural-resources-trust-fund-board/. CREW has been unable to definitively confirm that the Brad Canale who was appointed to the Wayne State University board is the same Brad Canale associated with NERD.


188 Oosting, "Michigan Gov. Rick Snyder's NERD Fund to close amidst ongoing calls for transparency."


192 Beckel, "CVS backs Michigan Gov. Rick Snyder’s NERD Fund."

193 Kroll, "All the Governors’ Dark-Money Funds."

Making Government Accountable (MGA)

No public website

Type of group: Shadow governance/Dark money

Type of support: Overall agenda, elections

Tax status: 501(c)(4)

Active: March 23, 2015 – present

Stated mission: “To promote the social welfare as defined in 501(c)4 of the Internal Revenue Code, including engaging in activities to educate the public and elected leaders in the United States of America, the states, and local governments, to advance ideas and programs that reinvent, innovate and create responsive, productive government institutions at the federal, state, and local level, to promote responsible public policy, and to promote the free markets and economic vitality of the United States of America”

Ties to the governor: Formed by Gov. Snyder’s supporters to fund a national tour by the governor in advance of the 2016 presidential primaries.

Activities: MGA was initially created to raise funds for Gov. Snyder to travel around the country, potentially in advance of a possible presidential bid. However, the nonprofit was used to further obfuscate donations to another nonprofit, Moving Michigan Forward, and to purchase issue ads to help elect Republicans to the Michigan legislature.

When MGA was initially formed, many reporters theorized it was to set the stage for a potential presidential bid; Gov. Snyder never confirmed or denied this, instead saying that “I’ve got a full plate right now, and I am focused on being governor.” An anonymous aide confirmed that Gov. Snyder was considering a presidential run at the time.

MGA donated $350,000 to Moving Michigan Forward, the nonprofit established to replace NERD, and $250,000 to The Governor’s Club, Gov. Snyder’s PAC.

In the 2016 election, MGA paid for internet and television advertising to promote six GOP Michigan House candidates.

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196 However, a project of MGA, Michigan Comeback Story, has a website available at https://michigancomebackstory.org/


204 Egan, "Snyder nonprofit airs ads to boost GOP House hopefuls."
Donor disclosure and revenue: MGA does not publicly disclose its donors. Former Michigan Republican Party Chairman Bobby Schostak has helped raise money for MGA.205

MGA reported revenue of $2,248,433 in 2015.206

Moving Michigan Forward (MMF)

www.movingmiforward.com

Type of group: Shadow governance
Type of support: Overall agenda
Tax status: 501(c)(4)
Active: October 11, 2013 – present207

Stated mission: “To operate exclusively for the promotion of civic action and social welfare by promoting the common good and general welfare of the residents of, and visitors to the State of Michigan. To support the public policies on the federal, state, and local levels, that will bring about civic betterments and social improvements to Michigan residents. To support programs aimed at improving Michigan’s business climate and employment opportunities. To encourage and advocate citizen participation in political, civic and governmental events and associated activities. To support activities and programs that improve the quality and effectiveness of government for the State of Michigan. To promote charitable causes, including lessening the burdens of government in the State of Michigan. To receive and administer funds to sponsor, conduct research, secure goods and services, or to hold events in conjunction with the promotion of these purposes.”208

Ties to the governor: Bill Martin, chairman of MMF through October 2015, was appointed to the State Officers Compensation Commission — responsible for determining the salaries and expense allowances of the legislature, judiciary, and members of the executive branch, including the lieutenant governor and governor — by Gov. Snyder.209 Wendy Wisniewski, assistant secretary/treasurer as of December 2015, is an executive assistant to both the deputy chief of staff and cabinet director in Gov. Snyder’s administration.210 Renae Moore, assistant secretary/treasurer as of December 2015, was also the assistant secretary/treasurer for NERD.211

Activities: MMF was established as a “transparent alternative” to NERD, with the nonprofit consistently listing donors online.212 According to MMF’s self-disclosed reports through the third quarter of 2017,

212 Oosting, "Snyder shifts anonymous donations to aid Flint efforts."
however, over 45% of MMF’s contributions have come from two other nonprofits tied to Gov. Snyder that
do not fully disclose their donors: Celebrating the Power of Michigan and Making Government
Accountable.213

MMF has spent a large amount of its revenue on “recovery and outreach efforts” in Flint, which faced a
massive public health crisis after lead pipes poisoned public drinking water.214 President Obama declared a
federal state of emergency in 2016.215 MMF spent “$179,000 on direct mail, telephone town halls, robocalls,
text alerts, and billboards in Flint” in the first quarter of 2016.216 As of the third quarter of 2017, MMF has
spent over $380,000 on Flint outreach.217

The group attracted controversy when it was revealed that Gov. Snyder was also using MMF to contract with
the public relations firm Mercury and Bill Nowling of the public relations firm Finn Partners in order to
respond to the Flint crisis.218 Both firms had previous connections to Gov. Snyder. Mercury Senior Vice
President Bettina Inclán is the wife of Gov. Snyder’s former chief of staff. Bill Nowling, a senior partner at
Finn Partners, had served as the spokesman for Gov. Snyder’s 2010 gubernatorial campaign. Indeed, Nowling
had previously been an indirect beneficiary of one of the governor’s other affiliated nonprofits: he “ran press”
for former Detroit emergency manager Kevyn Orr, whose office rent was paid for by NERD. 219

Donor disclosure and revenue: MMF discloses its donors online in quarterly reports. From 2013–2014, the
fund listed donors such as PVS Chemicals ($25,000), insurance company Jackson National ($75,000), and
businessman William Parfet ($25,000).220 However, many of MMF’s donations came from Gov. Snyder’s
other nonprofits, significantly limiting transparency. Since the start of 2013 through the third quarter of 2017,
MMF reported $350,000 in donations from CPM and $355,500 from MGA.221

MMF self-reported a revenue of $507,692 in 2016.222

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213 CREW analysis of MMF’s contributions.
214 Oosting, "Snyder shifts anonymous donations to aid Flint efforts."
215 "Merrit Kennedy, "Lead-Laced Water In Flint: A Step-By-Step Look At The Makings Of A Crisis," NPR, Apr. 20, 2016,
crisis
216 Oosting, "Snyder shifts anonymous donations to aid Flint efforts."
217 CREW analysis of MMF’s reported expenditures.
219 Jonathan Oosting, "Snyder fund foots bill for PR firms in Flint crisis"; Chris Gautz, "Snyder defends using nonprofit NERD fund to pay
defends-using-nonprofit-nerd-fund-to-pay-for-orr-s-expenses; For information about Bill Nowling’s position at Finn Partners, see
https://www.lambert-edwards.com/team/william-nowling/
221 CREW analysis of MMF’s reported contributions.
Missouri: Former Governor Eric Greitens
Republican
Assumed office January 9, 2017
Currently serving first term, which will end January 2021; two term limit

The Committee for a New Missouri, Inc. (CNM)

www.newmissouri.org (defunct)223
Type of group: Shadow governance
Type of support: Inauguration
Tax status: 501(c)(4)
Active: November 19, 2016 - January 3, 2018224

Stated mission: To “…plan, coordinate, provide a source of funds, and stage events related to the inauguration of the newly elected Governor of Missouri and all activities incident or related thereto, including without limitation, soliciting funds to defray the expenses associated with some or all of its activities.”225

Ties to the governor: CNM was created to fund Gov. Greitens’ 2017 inauguration festivities. It was founded by Gov. Greitens’ campaign treasurer and his attorney, who is also a lawyer for the Republican Governors Association.226

Activities: Gov. Greitens used CNM to raise private funds for his inauguration. While this practice is not uncommon for Missouri, both of Gov. Greitens’ immediate predecessors disclosed donor and spending information; Gov. Greitens did not disclose how much money was raised or spent.227

Donor disclosure and revenue: Gov. Greitens did not fully disclose donor information. Instead, he shared a list of “benefactors” that did not include donation amounts.228 There were more than 85 benefactors,

223 “Schedule of Events.” Greitens Inauguration 2017 (stored on Wayback Machine)
224 “Missouri Online Business Filing: The Committee for a New Missouri, Inc.” State of Missouri, Office of the Secretary of State
227 Jason Hancock, “Cost of Missouri Gov. Eric Greitens’ Inauguration Still Unknown,” The Kansas City Star, Feb. 27, 2017,
228 “Benefactors,” The Committee for a New Missouri, Inc., St. Louis Post-Dispatch,
including Anheuser-Busch, Boeing, Centene, Enterprise, Express Scripts, Kansas City Power & Light, Kansas City Southern, Monsanto, Pfizer, Uber, and Walmart, and many Missouri lobbyists.229

CNM’s revenue has not yet been reported to the IRS. In December 2016, the Osage Nation tribe in Oklahoma, which is hoping to build a new casino in Missouri, donated $52,700 to Committee for A New Missouri Inc.230 The donation was disclosed by Osage Nation public records and Osage Nation leader Chief Standing Bear’s comments to his tribe’s gaming board.231 As Chief Standing Bear explained to the St. Louis Post-Dispatch, “That was me trying to establish a good relationship with the governor of Missouri…We thought we should show him respect.”232

### A New Missouri, Inc. (ANM)

[www.newmissouri.com](http://www.newmissouri.com)

**Type of group:** Shadow governance  
**Type of support:** Overall agenda  
**Tax status:** 501(c)(4)  
**Active:** February 5, 2017 - present233

**Stated mission:** “[C]onducting activities allowed pursuant to the Act, including, but not limited to, the advancement of social welfare by promoting ideas, policies and/or legislation to create more jobs, higher pay, safer streets, better schools, and more, for all Missourians.”234

**Ties to the governor:** Gov. Greitens’ sister-in-law, Catherine Chestnut, is ANM’s executive director as of March 8, 2017.235 ANM was founded by Gov. Greitens’ campaign finance director, Meredith Gibbons; his campaign treasurer, Jeff Stuerman; and Michael Adams, an attorney who is employed by both the nonprofit and Gov. Greitens’ campaign fund.236 Austin Chambers, Gov. Greitens’ senior adviser, reportedly works with ANM, the governor’s campaign, and his state office; he is reportedly paid by ANM and is not on the state’s payroll, though he is a “regular fixture in the governor’s Capitol office.”237 The Kansas City Star reported that Meredith Gibbons, Gov. Greitens’ campaign finance director, would work out of ANM’s office.238

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230 Ibid.

231 Ibid.

232 Ibid.


236 Hancock, *The Kansas City Star*, July 12, 2017;


When asked about ANM, Gov. Greitens has said that “[t]he organization that you're referring to is one that I have no day-to-day responsibilities with” but that “[i]t does represent the interests of thousands of people around the state who care about our priorities getting passed.”

**Activities:** ANM was established a month after Gov. Greitens’ inauguration. Chambers, Gov. Greitens’ senior adviser, told *The Kansas City Star* that there will be coordination between ANM, the governor’s state office, and his campaign. According to Chambers, ANM’s role is “to advocate for and promote the governor’s agenda,” using various techniques to “make sure Missourians know what the governor is doing and what he’s trying to get passed.”

ANM has run ads attacking Republican lawmakers who were critical of Gov. Greitens or voiced opposition to legislation the governor backed. In April 2017, newspapers reported the group was running digital ads, radio ads, and robocalls against Republican state Senator Rob Schaaf. At least two of the digital ads included Sen. Schaaf’s personal cell phone number. Sen. Schaaf had previously criticized Gov. Greitens for his ties to dark money and his connection to Centene, a business that received a managed care contract.

Gov. Greitens’ senior adviser Chambers told *The Kansas City Star* that ANM targeted Schaaf because “important pieces of reform are being held up because Sen. Schaaf is playing personal political games.” After the ads received criticism for disclosing Sen. Schaaf’s private information, Gov. Greitens denied involvement, saying that ANM was “separate from the governor’s office.”

In May 2017, the *Springfield News-Leader* reported that ANM had prepared negative ads to attack five state senators for their opposition to the Blue Alert system, a program that alerts the public with information about suspects when law enforcement officers are assaulted. The program was a priority for Gov. Greitens. The ads were taken off ANM’s website and never used. The legislation passed the state Senate and the system was ultimately installed in August 2017.

ANM paid for buses to transport Republican supporters to the Capitol for a special legislative session that started May 22, 2017. Gov. Greitens called the session to push a bill allowing the state’s Public Service Commission to negotiate with local power company Ameren to offer large industrial users lower electric

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241 Ibid.


245 Ibid.

246 Ibid.


249 Ibid.


On June 7, 2017, ANM announced a rally with Gov. Greitens and former Arkansas Gov. Mike Huckabee.258 The rally took place in Springfield ahead of a special session on legislation related to abortion.259 Gov. Greitens held similar rallies in Joplin and St. Charles; ANM paid for Gov. Greitens’ flight to the St. Charles rally.260

In July 2017, ANM spent over $500,000 on television ads focusing on the state budget and taxes.261 According to Chambers, the ads advocated for Gov. Greitens to continue “to balance the budget without raising taxes.”262

In the summer of 2017, ANM donated $350,000 to a PAC named Missourians for Worker Freedom. The PAC was created to combat the repeal of Missouri’s right-to-work law, which Gov. Greitens had signed earlier that year.263

In the spring of 2018, Gov. Greitens was under investigation by the Missouri legislature for a number of alleged offenses, including accusations that shell companies were used to funnel money into his 2016 campaign.264 After a former campaign staffer testified that the governor directed him to meet with donors who were interested in having their identities concealed, A New Missouri’s records were subpoenaed by the Missouri House committee investigating Gov. Greitens.265 The Missouri House committee alleged that ANM...
was formed “for the express purpose of promoting the governor’s political agenda, is run by persons subject to the governor’s control, and is represented...by the same counsel who also represents the governor’s candidate committee, Greitens for Missouri.” 266

On May 29, a judge ordered ANM to release the records.267 Later that day, Gov. Greitens announced his resignation as part of a deal with the St. Louis Circuit Attorney to dismiss a felony computer tampering charge against him.268

**Donor disclosure and revenue:** ANM does not disclose its donors. Its revenue has not yet been reported to the IRS.

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Montana: Governor Steve Bullock

Democrat
Assumed office January 7, 2013
Currently serving second term, which will end January 2021; two consecutive term limit

Early Edge Action (EEA)

www.earlyedgeaction.org (defunct)

Type of group: Shadow governance
Type of support: Education
Tax status: 501(c)(4)
Active: January 12, 2015 - September 14, 2017

Stated mission: “Early Edge Action is a 501(c)4 coalition of private and public sector leaders, parents, and others who support Governor Steve Bullock’s vision for high-quality early education for all Montana 4-year-olds…”

Ties to the governor: Both Gov. Bullock and Lieutenant Gov. Angela McLean fundraised for EEA, and Gov. Bullock spoke at an EEA rally. When asked about EEA, Gov. Bullock spokesperson Dave Parker noted that “[w]e think it’s a good organization that is trying to help out on a key priority for the governor.” Additionally, Gov. Bullock has well-established ties to EEA founder Niles Hushka. Hushka is a Bullock donor whom the governor had previously appointed to be co-chair of a public-private business partnership. According to the Independent Record, Hushka stated that a year before EEA launched, he had promised Gov. Bullock that he would support early education funding if the governor proposed a plan. Once Gov. Bullock announced his “Early Edge” plan, Hushka created EEA. While involved with EEA, Hushka was also a member of Gov. Bullock’s State Workforce Investment Board. Gov. Bullock and EEA

271 “About Us,” Early Edge Action.
273 Ibid.
275 Ibid.
276 Mike Dennison, “Governor fundraising for nonprofit formed to promote his early education plan,” Independent Record, Jan. 27, 2015.
also share ties to the public relations firm Hilltop Solutions. The firm was hired by Gov. Bullock’s 2012 gubernatorial campaign, and in 2015 by EEA. In 2013, both the Bullock campaign and Hilltop Solutions were named in a complaint alleging that the campaign had used the PR firm to illegally coordinate with outside groups supporting the governor. The complaint was dismissed in 2015.

**Activities:** EEA focused on messaging, hiring public relations firm Hilltop Solutions in its efforts to promote the benefits of Early Edge, Gov. Bullock’s proposal to provide early childhood education grants to Montana public schools. EEA also partnered with Missoula-based parenting magazine, *Mamalode*, to organize a rally on the Montana state Capitol steps promoting Gov. Bullock’s plan. In its 2015 tax filing, EEA reported spending $86,171 for media production and placement.

Ultimately, the Montana legislature voted against including Early Edge in its 2016 budget. According to Montana corporate records, Early Edge Action was dissolved on September 14, 2017.

**Donor disclosure and revenue:** EEA lists donors on its website, though Huskha has said that anonymity is an option. Contributor information does not include amount donated.

KLJ Solutions donated at least $20,000 to the organization, making it the largest reported donor; EEA founder Niles Hushka was the president of KLJ Solutions at the time. Montana Quality Education Coalition also donated $5,000. Other listed donors include two PACs, about ten individuals associated with the healthcare industry, and at least twenty individuals associated with education. One Republican lawmaker noted that the group received multiple donations from healthcare companies that would benefit from a concurrent Medicaid expansion program in the same budget proposal.

EEA reported $169,415 in revenue for 2015.

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279 Ibid.


281 Ibid.; “Governor fundraising for nonprofit”

282 Alexander Deedy, “‘Let them learn’ rally at Capitol supports childhood education.”


285 Ibid.; “View Business Details”


290 Ibid.; “Governor fundraising for nonprofit”
Nevada: Governor Brian Sandoval

Republican
Assumed office January 3, 2011
Currently serving second term, which will end January 2019; two term limit

Nevada Can Do Better, Inc. (NCDB)

www.nevadacandobetter.com (defunct)

Type of group: Shadow governance
Type of support: Taxes, education
Tax status: 501(c)(4)

Stated mission: “To advocate reform in Nevada’s education system.”

Ties to the governor: NCDB was founded by Gov. Sandoval’s former campaign manager, Jeremy Hughes.

Activities: NCDB commissioned a poll, released in March 2015, to show support for Gov. Sandoval’s plan to increase taxes for education spending; the results were promoted on its now defunct website. According to the nonprofit’s tax filings, the group also utilized “[d]igital advertisements and social media to promote reform in Nevada tax and education system.”

Other information: Hughes, the president of the group, was also registered as a state-level lobbyist in 2015, representing SB Strategic Consulting, Inc. and Uber, as well as NCDB. Hughes currently works at November Inc., a political consulting firm.

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292 Entity Details - Secretary of State, Nevada “Nevada Can Do Better, Inc.” https://nvsos.gov/sosentitysearch/CorpDetails.aspx?lx8nvq=3IzA%252bZ21%252bRRRA3g?7D%252fImQ%253d%253d&m7=0 (Accessed February 9, 2018).


**Donor disclosure and revenue:** NCDB does not publicly disclose its donors. However, the identically named Nevada Can Do Better PAC, which also shares an address with the group, donated $23,900 to NCDB in May 2015.299 The PAC’s only recorded revenue was $25,000 from MGM Resorts International, received in April 2015.300 NCDB reported revenue of $183,900 in 2015.301 NCDB gave $23,103 to Engage Nevada, a nonprofit that registered 30,000 new voters in 2015, reportedly tipping some close state races.302

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New Jersey: Former Governor Chris Christie

Republican
Assumed office January 19, 2010
Second term ended January 2018; two consecutive term limit

Committee for Our Children’s Future, Inc (COCF)

No public website
Type of group: Shadow governance
Type of support: Overall agenda
Tax status: 501(c)(4)
Active: July 12, 2011 - unknown

Stated mission: “The organization’s primary exempt purpose is to further the common good and general welfare of citizens of the U.S. by educating the public about policies that will enhance the lives of taxpayers, families, and children by advocating for and raising awareness about short and long-term policies to reduce and restructure government costs, prioritize how tax dollars are spent, and ensure that today’s leaders make decisions for a brighter future for the next generation.”

Ties to the governor: The group was “formed by Christie friends dating back to his undergraduate days at the University of Delaware.” Gov. Christie has denied involvement with the group.

Activities: An anonymous source affiliated with COCF told The New York Times that the group was formed to defend Gov. Christie against labor union attacks. COCF spent over $6 million in pro-Gov. Christie advertising by July 2012, including praising Gov. Christie’s budget and a New Jersey teacher tenure bill his office worked on. COCF spent $8 million on ads by the end of 2012. The group does not appear to have been active since.

Gov. Christie said he would not tell COCF to disclose its donors: “It’s up to them, it’s their group…I have nothing to do with the group. If they are out there helping me, I say thank you very much.”

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303 Registered with the IRS as “Committee for Our Childrens Future”
304 See State of New Jersey Division of Revenue and Enterprise Services Business Name Search at https://www.njportal.com/DOR/BusinessNameSearch/Search/BusinessName
309 Confessore, “Wealthy, Influential, Leaning Republican and Pushing a Christie Bid for President.”
311 Hassan, “Christie says it’s up to Committee for Our Children’s Future if they want to disclose funding sources.”
also said that “[t]hey are supporting me because they like my policies...People like the policies we are pursuing. It’s a happy circumstance.”

**Donor disclosure and revenue:** COCF does not publicly disclose its donors. It reported no revenue in its 2013-2014 fiscal year.

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**Reform Jersey Now, Inc. (RJN)**

No public website

**Type of group:** Shadow governance

**Type of support:** Overall agenda

**Tax status:** 501(c)(4)

**Active:** May 3, 2010 – December 31, 2011

**Stated mission:** “Further the common good and general welfare of the citizens of New Jersey by promoting public policies that foster an environment to create more jobs in New Jersey, while making the state a more affordable place to live for its citizens.”

**Ties to the governor:** Members of the RJN volunteer advisory board reportedly included Bill Palatucci, “[Gov.] Christie’s closest political confidante” and Mike DuHaime, Gov. Christie’s chief strategist for his 2009 gubernatorial campaign, though the two were not named in RJN’s tax filings. Before serving as RJN’s treasurer in 2010 and 2011, Ron Gravino was on Gov. Christie’s 2009 transition team. Gov. Christie also appeared at a fundraiser for the group in 2010.

**Activities:** In its 2010 tax filings, RJN noted that it engaged in “public education, grassroots lobbying, and other similar activities through the purchase of television and radio air time, advertising space in print media, and informational brochures.” For example, RJN made a robocall urging listeners to contact Democratic State Senator Paul Sarlo and “tell him to stop blocking Governor Christie’s efforts to end abuse of public employee benefits.” State Sen. Sarlo called RJN “an extension of the governor.” The group also sent mailers to state Senate President Stephen Sweeney’s district, telling constituents to call upon the senator to push through a “tool kit” of reforms proposed by Gov. Christie.

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312 Ibid.


318 Friedman, “Reform Jersey Now has raised $624K to push Gov. Christie’s agenda.”

319 “Form 990: Reform Jersey Now” (2010).


321 Ibid.

Donor disclosure and revenue: RJN voluntarily disclosed its donors at the end of 2010. Top donors included state contractors such as Ferreira Construction, a company that was awarded $174 million from the New Jersey Turnpike Authority in joint contracts; George Harms Construction, a company that received over $130 million combined from the New Jersey Department of Transportation, NJ Transit, and the New Jersey Turnpike Authority; and Langan Engineering & Environmental, which received approximately $2 million from a combination of state government departments. RJN reported revenue totaling $586,887 in 2010, but only $1,257 in 2011.

325 “Form 990: Reform Jersey Now” (2010); “Form 990: Reform Jersey Now” (2011).
New Mexico: Governor Susana Martinez

Republican
Assumed office January 1, 2011
Currently serving second term, which will end January 2019; two consecutive term limit

New Mexico Competes, Inc. (NMC)

www.newmexicocompetes.org (defunct) 326
Type of group: Shadow governance
Type of support: Overall agenda
Tax status: 501(c)(4)

Stated mission: “[T]o register voters in targeted areas of the state, advocate for sound fiscal policy to help diversify and grow New Mexico’s economy and to advocate for education reform in New Mexico.” 328

Ties to the governor: Sara Lister, NMC’s first executive director, was a deputy cabinet secretary in the Workforce Solutions Department of Gov. Martinez’s administration. 329 Lister was replaced in February 2014 by Alexis Valdez Darnell, who was previously Gov. Martinez’s operations director; Darnell is married to Scott Darnell, Gov. Martinez’s deputy chief of staff. 330 Attorney Pat Rogers, who served as NMC’s secretary and treasurer, has been called Gov. Martinez’s “close political ally” by the Santa Fe New Mexican. 331

Activities: In 2013, 15 of New Mexico’s largest mental health providers were under criminal investigation to determine whether the companies had defrauded Medicaid of $36 million. 332 NMC ran an ad campaign supporting Gov. Martinez’s handling of the scandal, saying that Gov. Martinez was “cracking down” on the fraud. 333

When Albuquerque Public Schools Superintendent Winston Brooks opposed some of Gov. Martinez’s education policies, NMC sent fliers attacking Brooks for “putting up roadblocks to education reform.” 334

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326 “New Mexico Competes.” New Mexico Competes (stored on Wayback Machine)


328 U.S. Department of the Treasury, Internal Revenue Service, “Form 990: New Mexico Competes Inc.”

329 “Sara Lister.” LinkedIn.


331 Justin Horwath, “In defense of adviser, governor says nothing ‘improper,’ but experts differ.” Santa Fe Reporter, Mar. 18, 2017.


333 Terrell, “Special interest group cozy but unaffiliated with gov.”

334 Ibid.
By the end of 2013, the Democratic Party of New Mexico filed formal complaints with the IRS and FEC about NMC, alleging that the nonprofit was illegally coordinating with Gov. Martinez’s campaign; the complaints do not appear to have been investigated.335

While only active in New Mexico, NMC was registered in Washington, D.C. It filed a certificate of withdrawal in New Mexico on December 15, 2015.336

Other information: Pat Rogers, NMC’s secretary and treasurer, helped negotiate a gambling contract with two Louisiana developers that later came under scrutiny for the appearance of pay-to-play politics at the governor’s office.337

Donor disclosure and revenue: NMC did not disclose its donors. Its reported revenue for 2013 was $846,503.338

New York: Governor Andrew Cuomo

Democrat
Assumed office January 1, 2011
Currently serving second term, which will end January 2019; no term limit

New Yorkers United Together, Inc. (NYUT)

No public website
Type of group: Shadow governance
Type of support: Immigration
Tax status: 501(c)(3)
Active: March 31, 2017 - present

Stated mission: “To raise funds for the legal defense of immigrant populations within the State of New York...To raise public awareness and promote acceptance of the rich culture and diverse populations within the State of New York...To advance New York’s efforts as the leader in the fight against discrimination.”

Ties to the governor: The group’s co-founders are Gov. Cuomo’s close friends, including his former aide Steven M. Cohen; Ken Sunshine, a public relations consultant; and Christine C. Quinn, a former speaker of the New York City council. Three celebrities who spoke in NYUT’s first ad, in which Gov. Cuomo also appeared, told The New York Times that they were asked to participate by Gov. Cuomo’s office.

Activities: In the spring of 2017, an ad paid for by NYUT was circulated online. It advocated for Gov. Cuomo’s immigration policy and ended with a promotion for the Liberty Defense Project, a Cuomo administration initiative that offers legal defense for immigrants. The Liberty Defense Project was announced about a week before NYUT registered with New York.

Christine Quinn, one of the co-founders of NYUT, denied Gov. Cuomo’s involvement in NYUT. Gov. Cuomo’s office released a statement noting that NYUT’s co-founders “came to the governor and the video is what came out of that group discussion.”

Donor disclosure and revenue: NYUT has not disclosed its donors. Its revenue is not yet reported.

Committee to Save New York, Inc. (CSNY)

www.letsfixalbany.com (defunct)
Type of group: Shadow governance

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340 Ibid.


342 Ibid.

343 Ibid.

344 Ibid.

345 Ibid.

346 Ibid.
Type of support: Budget, pension
Tax status: 501(c)(4)
Active: November 18, 2010 – October 3, 2013

Stated mission: “To educate New Yorkers regarding the state budget process, to participate in the budget process in a nonpartisan manner, and to evaluate and support proposals to reform the budget process that will allow for the fiscal and economic recovery of the Empire State.”

Ties to the governor: The organization was reportedly founded at the urging of the governor. CSNY initially retained the public relations firm DKC; its chairman, Dan Klores, is a close friend of the governor. In late 2011, CSNY dropped DKC and commissioned the lobbying firm Mercury Public Affairs and partner Michael McKeon; McKeon was the executive director of Republicans for Cuomo during Gov. Cuomo’s 2010 campaign.

Activities: In the first 18 months of Gov. Cuomo’s term, CSNY supported his policy agenda with television and radio advertising. These ad campaigns included support for Gov. Cuomo’s budget and proposed pension cuts. Many of the campaigns, such as a property tax cap and millionaire’s tax repeal, were criticized as benefiting wealthy New Yorkers, specifically businesses with ties to the nonprofit. CSNY reportedly spent more money on state lobbying than any other organization in New York in both 2011 and 2012.

Two grassroots advocacy groups filed a complaint against CSNY in 2011, alleging that the nonprofit should register as a lobbying group, file its expenditures, and list Gov. Cuomo as the person for whom the group was lobbying. The group drew further fire when gambling interests donated $2 million to CSNY shortly before Gov. Cuomo supported legalizing Vegas-style casinos in New York, making it a “centerpiece of his State of the State address.” Shortly afterward, Gov. Cuomo signed a state ethics law which required lobbying groups to disclose the sources of their funds. After the law was passed, he distanced himself from the...
nonprofit, fundraising for his agenda through the state Democratic Party instead.\textsuperscript{358} CSNY became dormant after the law took effect, and was officially disbanded in 2013.\textsuperscript{359}

\textbf{Other information:} CSNY was founded by some of New York’s wealthiest citizens, including bank CEOs, real estate developers, media owners, and hedge fund managers.\textsuperscript{360} It was run by a three-person executive committee that included Partnership for New York City (PNYC) President and CEO Kathryn Wylde, Real Estate Board of New York President Steven Spinola, and Rob Speyer, CEO of commercial real estate company Tishman Speyer.\textsuperscript{361}

\textbf{Donor disclosure and revenue:} CSNY did not disclose its donors.

A \textit{New York Times} investigation revealed that CSNY’s largest donor in 2011 was PNYC, a section 501(c)(3) nonprofit comprised of nearly 300 New York business leaders, which donated over $3 million to CSNY.\textsuperscript{362} PNYC members Citigroup and JPMorgan Chase also donated individually.\textsuperscript{363} A gambling association was the second largest donor, contributing $2 million.\textsuperscript{364} Additionally, real estate companies Brookfield Properties, the Durst Organization, and Newmark Knight Frank contributed to CSNY.\textsuperscript{365} CSNY’s identified backers include some of the state’s biggest recipients of bank bailouts and corporate subsidies.\textsuperscript{366} While identifying information was redacted, 20 donors gave $12 million to CSNY in 2011.\textsuperscript{367}

In all, CSNY raised over $17 million between 2010 and 2013.\textsuperscript{368}


\textsuperscript{361} Public Accountability Initiative, June 2012.


\textsuperscript{365} Ibid.

\textsuperscript{366} Ibid.

\textsuperscript{367} Public Accountability Initiative, June 2012.


North Carolina: Governor Roy Cooper

Democrat
Assumed office January 1, 2017
Currently serving first term, which will end January 2021; two consecutive term limit

Moving NC Forward (MNCF)

No public website
Type of group: Shadow governance
Type of support: Overall agenda
Tax status: 501(c)(4)
Active: Dec. 28, 2016 - present

Stated mission: “The organization will promote the social welfare by advocating for policies that advance economic growth, stronger schools, tolerance, and fair and legal electoral districts.”

Ties to the governor: MNCF shares an address, suite number, and phone number with Nexus Strategies, a local political campaign and government relations firm that ran Gov. Cooper’s 2016 election campaign, and both organizations also share an address and phone number with Gov. Cooper’s campaign committee, Cooper for North Carolina. The New York Times described Nexus Strategies co-founder Morgan Jackson as Gov. Cooper’s “chief strategist.” Scott Falmlen, Nexus Strategies’ other co-founder, was treasurer of Gov. Cooper’s campaign committee during Gov. Cooper’s gubernatorial campaign through January 2017 and is currently the “custodian of books” for the campaign committee. Falmlen was on Gov. Cooper’s inaugural committee. Gov. Cooper paid Nexus Strategies hundreds of thousands of dollars over the course of his gubernatorial campaign. When a WRAL reporter asked Gov. Cooper’s office about MNCF, a spokeswoman said she “did not know about the group and referred questions to Cooper’s campaign.”

consultants at Nexus Strategies.” When Nexus Strategies was contacted, the WRAL reporter was then referred to MNCF President Tom Hendrickson. Hendrickson is a former state Democratic Party chairman, and he and MNCF’s other board members are longtime Democratic Party contributors. According to the News & Observer, Hendrickson stated that MNCF “was not formed to support Cooper’s political ambitions.” Nevertheless, the finance director for Gov. Cooper’s 2016 campaign, Kate Connelly, is also a member of MNCF’s fundraising committee.

**Activities:** Little is known about MNCF, but the group held a two-day event in March 2017 that included a reception with Gov. Cooper as well as “policy talks” that were “led by special guests from the Governor’s Leadership Team.” Donations to attend the event ranged from $10,000 to $100,000. MNCF held another two-day event in June 2017 that was also attended by Gov. Cooper and “key members of his administration,” including his health and human services secretary, transportation secretary, and state budget director. While the invitation to the event did not list donation amounts, it did provide an address to mail contributions to, and noted that those contributions would not be tax-deductible. WRAL reported that Gov. Cooper was listed as the headliner for the gathering. According to Gov. Cooper’s spokesperson, he was only speaking at a lunch and was not involved in any fundraising efforts. Hendrickson said that MNCF plans to hold three meetings each year.

**Donor disclosure and revenue:** MNCF does not publicly disclose its donors. When asked if MNCF would be releasing donor information, Hendrickson said the prospect had not been discussed but that MNCF would “fully comply with the law.” Paperwork filed with North Carolina’s secretary of state reveals that MNCF raised $370,000 in its fiscal year ending 6/30/2017. Kate Connelly, Gov. Cooper’s finance director for his 2016 gubernatorial campaign, reported that she had raised $493,000 for MNCF from March - November 2017.

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377 Ibid.
378 Ibid.
381 Binker, WRAL, Mar. 18, 2017.
382 Ibid.
383 Ibid.
384 Ibid.
386 Ibid.
387 Ibid.
388 Ibid.
Ohio: Governor John Kasich

Republican
Assumed office January 10, 2011
Currently serving second term, which will end January 2019; two consecutive term limit

Balanced Budget Forever (BBF)
www.balancedbudgetforever.com (defunct)\(^{390}\)
Type of group: Shadow governance
Type of support of support: Budget
Tax status: 501(c)(4)
Active: November 13, 2014 – October 21, 2016\(^{391}\)

Stated mission: “Promote an amendment to the Constitution to require a Balanced Federal Budget.”\(^{392}\)

Ties to the governor: In December 2014, Politico reported that Gov. Kasich had “created a 501(c)(4) nonprofit, called Balanced Budget Forever.”\(^{393}\) A few months later, The Washington Post confirmed the link, describing BBF as “a non-profit advocacy group founded by Kasich associates.”\(^{394}\) Jo Ann Davidson, the president of BBF, is a friend of Gov. Kasich’s and a “member of [his] inner circle.”\(^{395}\) A previous speaker of the Ohio House of Representatives, she was appointed by Gov. Kasich to the Ohio Casino Control Commission in 2011.\(^{396}\) Davidson is also connected to Two Paths America (TPA), another nonprofit supporting Gov. Kasich’s agenda — she signed the paperwork changing its name and is reportedly serving on the board.\(^{397}\) BBF Secretary Ron Hartman, also referred to as a “longtime friend,” has been an adviser to Gov. Kasich in the past.\(^{398}\) Directors Don Thibaut and Bob Klafky are considered “key members of Kasich’s

\(^{390}\) “Balanced Budget Forever,” Balanced Budget Forever (stored on Wayback Machine).
\(^{391}\) Corporation Details: “Balanced Budget Forever” Ohio, Office of the Secretary of State.
\(^{392}\) U.S. Department of the Treasury, Internal Revenue Service, “Form 990: Balanced Budget Forever.”
kitchen cabinet.” They both have been Columbus lobbyists. Finally, Jai Chabria, a former senior adviser to Gov. Kasich, who worked for him from 2010 to 2016, listed “develop[ing] and launch[ing] the Balanced Budget Forever national tour” as part of his biography on his consulting firm’s website.

Activities: In December 2014, Gov. Kasich visited Arizona as part of a tour to advocate for a balanced budget constitutional amendment. This trip was “aided” by BBF. In January 2015, Gov. Kasich visited North and South Dakota, Montana, Wyoming, Utah, and Idaho on the tour. BBF published a number of videos in January and February 2015, most of which featured Gov. Kasich, that focused on the balanced budget amendment, targeting South Carolina, South Dakota, Wyoming, and Arizona.

The high profile trips led to speculation about Gov. Kasich’s 2016 presidential aspirations. Gov. Kasich ultimately entered the race on July 21, 2015; he failed to secure a nomination as the Republican candidate, dropping out on May 4, 2016. BBF was dissolved October 21, 2016.

Donor disclosure and revenue: BBF’s contributors were included in a public version of its 2015 tax return. This type of identifying information is usually redacted in publicly available tax filings, though it is unclear whether this additional disclosure was intentional or released by mistake. BBF reported $370,105 in revenue in its 2015 filings, including $100,000 from Centene Corp, $50,000 from CBI Ventures LLC, $40,000 from One Ohio United, Inc, $15,000 from 55 Green Meadows LLC, and $154,500 from individuals.

Two Paths America (TPA)

www.twopathsamerica.com

Type of group: Dark money/Shadow governance
Type of support: Overall agenda, elections
Tax status: 501(c)(4)
Active: September 23, 2015 – present

Stated mission: “Two Paths America is focused broadly on public policy that encourages a Balanced Budget Amendment to the United States Constitution, the need for a strong national defense rooted in America’s international leadership, a forward-looking national energy plan that meets current needs economically while...”

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400 Ibid.
409 “Corporation Details: Two Paths America” Ohio, Office of the Secretary of State. https://www.5.sos.state.oh.us/ords/ftp=100?:7=P7_CHARTER_NUM2431342 (Accessed February 1, 2018).
developing renewable energy resources for the future, and a renewal of a national sense of community and exemplary citizenship.”410

Ties to the governor: Brooke Bodney, Gov. Kasich’s political fundraiser, was the nonprofit’s primary fundraiser in 2015, when it was known as Public Policy Matters (PPM).411 Gov. Kasich’s political advisors John Weaver and Chris Schrimpf, who served respectively as chief strategist and senior communications adviser his 2016 presidential campaign, are leading TPA as of February 10, 2017.412

Activities: TPA was originally active as PPM in the 2016 Republican presidential primary, but has since been rebranded as Two Paths America and shifted to supporting Gov. Kasich’s agenda. It first emerged in New Hampshire, mailing out voter shaming letters that tried to push voter turnout by providing recipients with information about their and their neighbors’ voting histories.413 The letters warned the recipients that “[y]ou and your friends, your neighbors, and other people you know will all know who voted and who did not vote.”414 The mail was delivered to voters ahead of the state’s 2016 presidential primary415 Ohio corporate records identified J.B. Hadden as PPM’s director.416 Mr. Hadden previously served as campaign treasurer for Ohio Attorney General, and Gov. Kasich supporter, Mike DeWine.417

On February 7, 2017, PPM changed its name to Two Paths America.418 On February 10, 2017, it was announced as a “new” organization that, according to CNN, would “champion [Gov. Kasich’s] campaign themes.”419 The name is also similar to Gov. Kasich’s book title, “Two Paths: America Divided or United,” which was revealed a little over a week before TPA’s launch.420

When asked about the organization’s voter shaming work as PPM after the group’s ties to Gov. Kasich’s political operation had been identified, Schrimpf replied, “(t)he organization (Public Policy Matters) believed that it is important to encourage citizens to vote. The practice referenced is a common one developed by political scientists. It wasn’t affiliated with the campaign. It was an independent organization.”421

Donor disclosure and revenue: TPA does not disclose its donors. TPA reported $313,370 in revenue in 2016.422

415 Ibid.
418 Citizens for Responsibility and Ethics in Washington, Jul. 18, 2017
420 Citizens for Responsibility and Ethics in Washington, Jul. 18, 2017
SHADOW GOVERNORS

Tennessee: Governor Bill Haslam
Republican
Assumed office January 15, 2011
Currently serving second term, which will end January 2019; two consecutive term limit

Tennesseans for Student Success, Inc. (TSS)

www.tnsuccess.org
Type of group: Shadow governance
Type of support: Education
Tax status: 501(c)(4)
Active: November 24, 2014 – present

Stated Mission: “T]o support and pursue a better education system and improved student achievement in Tennessee.”

Ties to the governor: Jeremy Harrell, the first executive director of TSS, was Gov. Haslam’s campaign manager in his 2014 re-election effort. He has also worked for the Haslam administration overseeing government appointments to boards and commissions as well as the Tennessee Republican Party. Mark Cate, Gov. Haslam’s former chief of staff, started a consulting firm, Stones River Group (SRG), that worked with TSS in 2015. Harrell joined the firm after leaving TSS. As recently as August 2016, TSS worked out of an office on the same floor and in the same building as the office of SRG.

Activities: TSS was created during a political battle over Tennessee Standards, the state’s version of Common Core. Gov. Haslam was credited with helping to usher in the standards during his first term in office. While Gov. Haslam was calling for a “full vetting” of the plan by the time of TSS’ creation, he still
defended the standards as key to the state’s recent educational gains. A number of Tennessee state legislators opposed the standards. TSS’ reported motto was “Going Backwards is Unacceptable.” Harrell, in his capacity as executive director of TSS, noted that “[t]he education gains we’ve made in recent years are worth celebrating, worth defending and worth continuing.” When the Chattanooga Times Free Press asked the Haslam administration about its ties to TSS, a spokesman replied that “[TSS] is an independent organization that supports continued education gains in Tennessee.”

TSS paid for various ad campaigns in support of Tennessee Standards in 2015. The group sponsored a $137,000 ad buy, which included a spot during the local Nashville broadcast of the Super Bowl featuring parents and teachers saying, "We have the fastest-improving schools in the nation. Yet some politicians want to drag us back to the days of lower standards, less accountability and fewer choices for parents. And that's why they need to hear from us." The group ran cable ads in all of Tennessee’s major markets; the nonprofit also ran radio ads. The ad campaigns were described as “one of the most visible efforts to counter” the arguments made by Tennessee state legislators that Common Core constituted federal overreach. TSS sent direct mail flyers in support of multiple state legislators, including state Sen. Steven Dickerson and state Rep. Joe Pitts. Sen. Dickerson is on the Senate Education Committee; Rep. Pitts is on the House Education Committee. TSS also organized constituents to attend a House subcommittee hearing about Common Core State Standards.

In October 2016, TSS was a sponsored of a negative ad attacking a state House Democratic candidate. Gloria Johnson, the subject of the ad, noted that TSS “claims to be an education focused non-profit but they have spent tremendous resources launching negative attacks that have nothing to do with education.”

In November 2016, TSS announced in a press release that it had spent $975,000 since April 2016 “to make sure Tennesseans knew about the great things happening in their classrooms.” Reporting on the press release, the Tennessee Journal blog noted that “[i]n general, [TSS] takes the same positions on education issues as does Gov. Bill Haslam.”

TSS had six lobbyists registered as of September 2017.

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433 Ibid.
434 Ibid.
440 Ibid.
441 Ibid.
443 Ibid.
Gov. Haslam quietly signed a bill to review and replace the Common Core standards in May 2015. The standards were officially phased out and replaced with a different policy in April 2016.

Then TSS board member Darrell Cobbins wrote a June 2017 op-ed supporting further education reform for the Commercial Appeal, noting that during the most recent legislative session, TSS “supported six pieces of legislation that would bring positive changes to all our classrooms and celebrated their ultimate passage.” The first bill mentioned was “a bill to highlight the need to keep our Tennessee-specific standards aligned to our Tennessee-specific assessment.”

**Donor disclosure and revenue:** TSS does not disclose donors. When asked about funders in 2015, then Executive Director Harrell said they "[p]eople who care very deeply about improving student achievement in Tennessee, and want to continue to build on the progress we've made."

TSS reported $750,000 in contributions and grants in 2015.

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**Tennessee Business Partnership (TBP)**

www.tnbp.org (defunct)

**Type of group:** Shadow governance

**Type of support:** Overall agenda

**Tax status:** 501(c)(4)

**Active:** January 7, 2014 – November 21, 2017

**Stated mission:** “The Tennessee Business Partnership (the ‘Partnership’) is an alliance of business leaders and organizations who support policy solutions that foster economic growth and enhance Tennessee’s competitiveness[,] The partnership advances its policy initiatives through a statewide effort that combines educating the public, engaging with policymakers, and supporting other like-minded organizations including making grants[,] In 2015, the partnership engaged primarily in education reform issues[.]”

**Ties to the governor:** TBP’s plans were first announced by Gov. Haslam’s legal counsel, Herbert Slatery. Stephen Susano, the executive director of TBP until August 31, 2015, is a principal and COO at the public...
SHADOW GOVERNORS

affairs firm Stones River Group, where a number of former Haslam staffers are currently employed:455 the firm was founded by Gov. Haslam’s ex-chief of staff and 2010 campaign manager, Mark Cate.456 Gov. Haslam’s 2014 re-election campaign manager, Jeremy Harrell, is another principal.457 Additionally, several other individuals with links to Gov. Haslam also work for TBP: Johnny Pitts, the secretary of TBP as of December 31, 2015, was the Memphis co-chair of one of Gov. Haslam’s inauguration committees.458 Raja Jubran, who served as TBP’s treasurer, was appointed by Gov. Haslam to the University of Tennessee Board of Trustees in 2012.459 Gov. Haslam’s chief fundraiser, Kim Kaegi, was also the lead fundraiser for TBP when the group first launched.460 Finally, TBP provided a $200,000 grant to another group, Tennesseans for Student Success, Inc., with ties to Gov. Haslam (see previous group above).461

Activities: TBP launched in early 2014, announcing that it would focus on supporting Tennessee’s K-12 educational reforms and two of Gov. Haslam’s other educational projects: Tennessee Promise, which would make the state’s community, applied technology, and other eligible colleges offering associate degrees free for qualifying high school students,462 and Drive to 55, which set a benchmark of 55% of Tennesseans achieving a college degree or certificate by 2025.463 Additionally, the group also planned to support a constitutional amendment which would allow the governor to appoint appellate judges.464

While little is known about TBP’s activity supporting Gov. Haslam’s educational platforms, TBP was a main financial backer of the constitutional amendment, which was listed on the 2014 ballot as Amendment 2.465 Gov. Haslam’s legal counsel, Herbert Slatery, was the first to announce TBP’s plan to back the amendment at a Tennessee Business Roundtable breakfast.466 “Vote YES on 2” was included in TBP’s tax filing as a related organization.467 Gov. Haslam became a co-chair of the “Vote YES on 2” campaign, appearing in a TV ad

456 Humphrey, “Consulting group poaches another member of Gov. Haslam’s administration.”
457 Ibid.
spot to support the amendment. TBP donated over $1.2 million to the official “Vote YES on 2” committee — nearly three-quarters of the total raised by the campaign. Amendment 2 was approved with 60% of the vote.

In early 2015, the leader of the opposition to the amendment filed a complaint with the Registry of Election Finance, alleging that TBP’s anonymous donors were used to obscure the source of funding to the “Vote YES on 2” campaign, pointing out that TBP had the same address and registered agent as the official “Vote Yes on 2” committee: “Due to these associations between [TBP] and the Vote Yes on 2 LLC committee, no meaningful disclosure of the source of the $1,225,000 has ever been made. Point of fact, these two entities appear to be synonymous.” The complaint was dismissed in May 2015.

In 2015, TBP also gave a grant for $250,000 to Tennesseans for Student Success LLC, an entity listed as a related entity by both TBP and a second nonprofit connected to both Gov. Haslam and Stones River Group, Tennesseans for Student Success, Inc. In 2014, TBP gave a grant of over $200,000 to Tennesseans for Student Success, Inc.

**Donor disclosure and revenue:** TBP does not publicly disclose its donors. It reported $826,000 in revenue in 2015, and $2,935,872 in 2014.

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471 Shrader, “Complaint Filed Against ‘Yes on 2’ Group.”


Wisconsin: Governor Scott Walker

Republican
Assumed office January 3, 2011
Currently serving second term, which will end January 2019; no term limit

Wisconsin Club for Growth, Inc. (WCG)
www.wicfg.com
Type of group: Dark money
Type of support: Elections
Tax status: 501(c)(4)
Active: August 24, 2004 – present

Stated mission: “[E]ducates and rallies citizens to embrace and enact policies that lead to sustained economic growth, limited government, and minimal taxation.”

Ties to the governor: In 2016, The Guardian released 1,500 pages of leaked documents purporting to show that Gov. Walker’s staff had directly coordinated with WCG on efforts to keep Gov. Walker and his allies in the state Senate in power during recall elections in 2011 and 2012. R.J. Johnson, a top consultant for WCG, was also a key adviser in Gov. Walker’s 2010 campaign, his recall election, and his 2014 election bid.

Activities: The Wisconsin Democracy Campaign estimates that WCG spent over $9 million on advertisements supporting Gov. Walker and state senators in the 2011 and 2012 recall elections. According to the leaked documents released by The Guardian, Gov. Walker’s staff had directly coordinated with WCG on these efforts. Kate Doner, Gov. Walker’s fundraiser, sent out an email stating that the campaign wanted to raise nine million in six weeks to pay for advertising in the senatorial recall races. She went on to explain that Gov. Walker wanted the ads streamlined — “run thru [sic] one group to ensure correct messaging” — and that group was to be WCG. In turn, the emails detail how Gov. Walker fundraised directly for WCG. Gov. Walker and his fundraising team approached big corporate donors such as Sheldon Adelson, hedge-fund manager Stephen Cohen, and Home Depot co-founder Ken Langone. Shortly after these meetings, the billionaires donated hundreds of thousands of dollars to WCG.

In 2015, the Wisconsin Supreme Court had investigated allegations of improper coordination between Gov. Walker’s staff and WCG, but ultimately dismissed the case, ruling that the citizens involved were “wholly...
innocent of any wrongdoing.” The decision was appealed to the U.S. Supreme Court, with opponents of the state’s ruling arguing that Wisconsin Supreme Court Justice David Prosser had directly profited from WCG’s efforts. However, the U.S. Supreme Court rejected the appeal in October 2016.

**Other information:** In February 2017, the *Wisconsin Gazette* reported that Wisconsin Supreme Court Justice Michael Gableman and WCG director Eric O’Keefe would be speakers at a Republican Party fundraiser set for March. WCB spent over $500,000 on Justice Gableman’s campaign in 2008. While Justice Gableman did not ultimately attend the event, a state Democratic party official filed a complaint against him for appearing in promotional materials; O’Keefe’s involvement in the fundraiser was also noted in the complaint.

**Donor disclosure and revenue:** WCG does not disclose its donors; however, the 2016 *Guardian* exposé revealed a list that included then candidate Donald Trump, high profile Republican donor Paul Singer, and other corporate donors. WCG also received $750,000 from the owner of NL Industries, which produced lead-based paint; Gov. Walker signed into law legislation to mitigate compensation claims against companies for lead poisoning, though this was later overruled by federal courts.

While WCG most recently reported a revenue of $44,624 in 2015, it has reported revenue as high as $12.5 million in 2011.
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