



September 14, 2020

Office of General Counsel
Federal Election Commission
1050 First Street, NE
Washington, DC 20463

To Whom It May Concern:

We respectfully request that your office begin an immediate investigation into the Republican Jewish Coalition Victory Fund (RJC Victory Fund) for what appears to be a clear violation of federal election law to benefit Senator Susan Collins' reelection campaign.

On September 9, 2020, the RJC Victory Fund announced an advertisement that features extensive video footage produced, created, and published by Senator Collins' campaign on its publicly available YouTube channel. The RJC Victory Fund ad can be viewed [here](#).


More than half of the 30-second ad contained footage that the Collins For Senator ("the Collins Committee") had produced, created, and posted online. The use of the footage by RJC Victory Fund qualifies as "republishing" of campaign materials, and therefore RJC Victory Fund made an excessive in-kind contribution to the Collins Committee by spending [\\$400,000 on the ad](#). Under [52 U.S. Code § 30116](#) (a)(7)(B)(iii) and [11 C.F.R. 109.23](#), republication "in whole or in part" of a candidate's campaign material is to be treated as an expenditure or in-kind contribution to the campaign.

An accounting of RJC Victory Fund's use of the Collins Committee's materials is found in Appendix 1, attached to the body of this letter below.

Republication of campaign materials in this wholesale way for a major ad expenditure is no different from an excessive contribution and is prohibited by federal law.

We believe the facts laid out above clearly show that RJC Victory Fund's ad is a clear violation of federal election law to illegally benefit Senator Susan Collins' reelection campaign. We request an immediate investigation into this matter.





Sincerely,

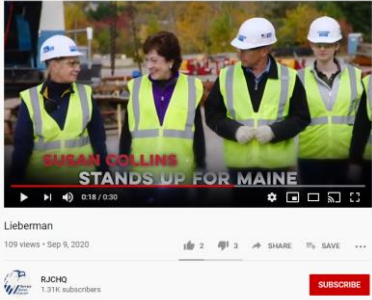




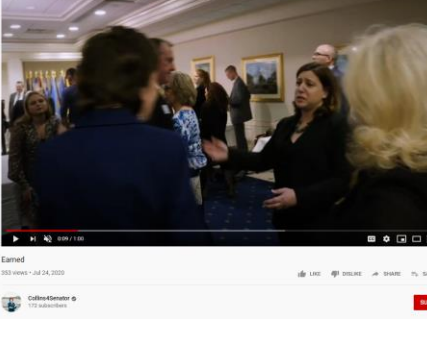


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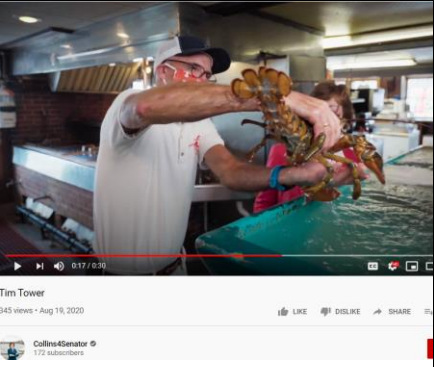


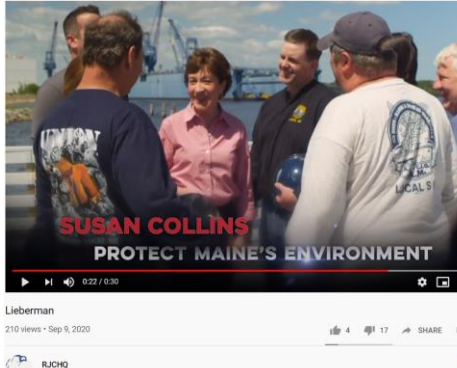


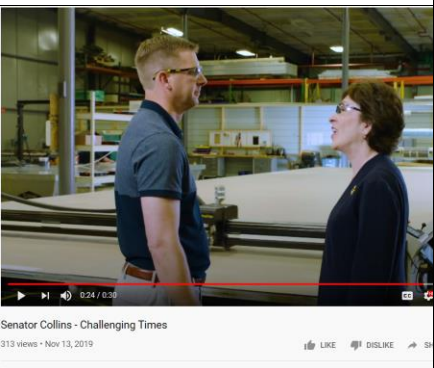
Brad Woodhouse









President

APPENDIX 1

RJC Video	Timestamp	Susan Collins' Ad	Timestamp
 <p>Lieberman 109 views · Sep 9, 2020</p>	RJCHQ, 9/9/20, :10-:12	 <p>Senator Collins - Working to lower drug prices 58,913 views · Jul 7, 2020</p>	Susan Collins For Senate, 7/7/20, :05-:07
 <p>Lieberman 109 views · Sep 9, 2020</p>	RJCHQ, 9/9/20, :06-:08	 <p>Senator Collins - Roads and Bridges 29,808 views · Jul 7, 2020</p>	Susan Collins For Senate, 7/7/20, :10-:12

	RJCHQ, 9/9/20, :18-:19		Susan Collins For Senate, 7/7/20, :26-:27
	RJCHQ, 9/9/20, :16-:17		Susan Collins For Senate, 7/20/20, :07-:09
	RJCHQ, 9/9/20, :14-:16		Collins4Sen tor, 7/24/20, :09-:12
	RJCHQ, 9/9/20, :12-:13		Collins4Sen tor, 1/8/20, :24-:25

	RJCHQ, 9/9/20, :22-:23		Collins4Sen tor, 8/19/20, :16-:18
	RJCHQ, 9/9/20, :17-:18		Collins4Sen tor, 11/13/19, :08-:09
	RJCHQ, 9/9/20, :21-:22		Collins4Sen tor, 11/13/19, :12-:14
	RJCHQ, 9/9/20, :21-:22		Collins4Sen tor, 11/13/19, :23-:24

 <p>Lieberman 210 views · Sep 9, 2020</p> <p>RJCHQ 1.31K subscribers</p>	RJCHQ, 9/9/20, :28-:29	 <p>SC14TV10H The Journey 1080p 1,020 views · Oct 4, 2014</p> <p>Collins4Senator 172 subscribers</p>	Collins4Sen tor, The Journey, :24-:25
 <p>Lieberman 210 views · Sep 9, 2020</p> <p>RJCHQ 1.31K subscribers</p>	RJCHQ, 9/9/20, :13-:14	 <p>Susan Collins - 2019 4k footage 506 views · Jul 18, 2019</p> <p>Collins4Senator 172 subscribers</p>	Collins4Sen tor, 2019 4k Footage, 2:07-2:10
 <p>Lieberman 210 views · Sep 9, 2020</p> <p>RJCHQ 1.31K subscribers</p>	RJCHQ, 9/9/20, :08-:10	 <p>Susan Collins - 2019 4k footage 506 views · Jul 18, 2019</p> <p>Collins4Senator 172 subscribers</p>	Collins4Sen tor, 2019 4k Footage, 3:28-3:30
 <p>Lieberman 210 views · Sep 9, 2020</p> <p>RJCHQ 1.31K subscribers</p>	RJCHQ, 9/9/20, :10-:12	 <p>Susan Collins - 2019 4k footage 506 views · Jul 18, 2019</p> <p>Collins4Senator 172 subscribers</p>	Collins4Sen tor, 2019 4k Footage, 3:37-3:44