FILED MCLENNAN COUNTY 4/9/2025 4:43 PM JON R. GIMBLE DISTRICT CLERK

Tiffany Madkins

NO. 2025-131-3

HON. PAT CURRY, STATE REPRESENTATIVE FOR HOUSE DISTRICT 56, and CURRY FOR TEXAS (A CAMPAIGN),	\$ \$ \$	IN THE 74th
TEAAS (A CAMPAIGN),	8	
Plaintiffs,	s §	
	§	
v.	§	
	§	JUDICIAL DISTRICT OF
COURAGEOUS CONSERVATIVES	§	
PAC, CHRISTOPHER EKSTROM,	§	
CHAIRMAN, and JOHN OR JANE	§	
DOES #1-5,	§	MCLENNAN COUNTY, TEX.
	§	
Defendants.	§	

#### DEFENDANT COURAGEOUS CONSERVATIVES PAC'S MOTION TO DISMISS PURSUANT TO TCPA<sup>1</sup>

TO THE HONORABLE JUDGE OF SAID COURT:

"[P]ublic speech relating to the election of the Speaker is subject to all the protections of the First Amendment." *Free Mkt. Found. v. Reisman*, 540 F. Supp. 2d 751, 756 (W.D. Tex. 2008). Plaintiffs' claims must be dismissed pursuant to the Texas Citizens' Participation Act, Tex. Civ. Prac. & Rem. Code § 27.001 *et seq.* Expedited dismissal is particularly appropriate where, as here, a lawsuit threatens or chills protected activity without any sound basis. *See King Street Patriots v. Texas Democratic Party*, 521 S.W.3d 729, 739 (Tex. 2017).

### I. Background

Defendant Courageous Conservatives PAC ("the PAC") is an independent-

<sup>&</sup>lt;sup>1</sup> Christopher Ekstrom has been named as a defendant but has not been served.

expenditure only political committee established in 2015 and registered with the Federal Election Commission. Def's Appx. 1 (Declaration of Christopher Ekstrom on Behalf of Courageous Conservatives PAC).<sup>2</sup>

The PAC authorized the distribution of the communications in Plaintiff's Appendix, i.e., text and Facebook messages urging registered Republicans to contact certain Texas House representatives regarding the then-upcoming vote for speaker of the Texas House of Representatives. Pat Curry was one of the House members referenced in these messages, having newly won both a regular and special election for District 56. There was no cost associated with the Facebook posts, which were simply posted to the PAC's own Facebook page. Def's Appx. 1-2. The text messages were sent to registered Republican voters in the respective districts of each referenced Member. Def's Appx. 2. Accordingly, the text messages referencing Curry were distributed to registered Republicans in Curry's House district. The PAC paid a vendor to distribute the text messages; the cost to distribute the messages regarding Curry was \$2,711.61. Def's Appx. 2, 66-67 (FEC report).

The texts and Facebook posts were both planned, designed, and distributed independently, i.e., Courageous Conservatives PAC did not have any communications with David Cook (or other prospective speaker candidates) regarding the communications nor did the PAC seek or receive any speaker candidate's consent or

<sup>&</sup>lt;sup>2</sup> Information about the Committee, and its campaign finance reports, is available at the Federal Election Commission website, see <u>https://www.fec.gov/data/committee/C00587022/?tab=filings</u>. The committee's page reflects its original registration date of Sept. 16, 2015.

authorization for such communications. Def's Appx. 2-3. They were, in short, speech, fully protected by the First Amendment and the Texas constitution's free-speech guarantees, directed at the general public on a matter of public concern.

#### II. Standard for Dismissal Under the TCPA

"[O]n the motion of a party under [CPRC] Section 27.003, a court shall dismiss a legal action against the moving party if the moving party demonstrates that the legal action is based on or is in response to: (1) the party's exercise of: (A) the right of free speech; (B) the right to petition; or (C) the right of association." Tex. Civ. Prac. & Rem. Code § 27.005(b). The TCPA sets out a multi-step process to adjudicate a motion to dismiss.

Initially, the defendant must show "by a preponderance of the evidence that the legal action is based on, relates to, or is in response to' defendant's exercise of' a right of free speech, association, or petition. *Martin v. Walker*, 606 S.W.3d 565, 567 (Tex. App.—Waco 2020) (quoting CPRC § 27.005(b). "If the [defendant] meets that burden, then under the second step, the burden shifts to the [plaintiff] to establish "by clear and specific evidence a prima facie case for each essential element of the claim in question." *Id.* (quoting § 27.005(c)). If the plaintiff fails to satisfy its burden to present a prima-facie case under section 27.005(c), the trial court must dismiss the action. *Id.* However, even if the plaintiff responds to the TCPA motion by establishing a prima facie case on each element of a claim, the court shall dismiss the action if the defendant establishes an affirmative defense or other grounds on which the defendant is entitled to judgment as a matter of law. CPRC § 27.005(d).

#### III. The TCPA Applies

# a. Curry's lawsuit implicates the right to free speech, association, and the right to petition.

The TCPA clearly applies to all of Plaintiffs' claims. Plaintiffs' lawsuit, on its face, is expressly "based on" and "in response to" Courageous Conservatives PAC's communications criticizing Pat Curry (and other state representatives) and imploring Republican (and other concerned citizens) to contact them regarding their positions and forthcoming votes in the race for Speaker of the House. Curry's lawsuit<sup>3</sup> seeks damages and a speech-prohibiting injunction against these communications—which communications were made in Defendant's exercise of all three enumerated and fundamental rights which the TCPA was enacted to protect. Courageous Conservatives PAC's communications at issue were prototypical "issue advertisements" that come within the very core of First Amendment protections. But more to the point here, they constitute "free speech" in connection with the House vote for speaker, which is clearly a matter of public concern for TCPA purposes under CPRC 27.001(7)(A), (B), and (C). See Polk Cnty. Publ'g Co. v. Coleman, 685 S.W.3d 71, 76 (Tex. 2024) (suit filed in response to newspaper reports about notable case plainly implicate TCPA). They also constitute communications within the right of association (a PAC by nature exists to pool resources for effective political advocacy

<sup>&</sup>lt;sup>3</sup> Defendant refers to Plaintiffs Pat Curry and "Curry for Texas" collectively as "Curry."

by more than one individual)<sup>4</sup> and within the right to petition (*inter alia*, communications "pertaining to" a "legislative proceeding"). CPRC §§ 27.001(2), (4). The vote for Speaker is a proceeding in the legislature, and the communications pertain to the vote. The Texas Supreme Court recently described a lawsuit "by a government official against a reporter in response to a critical news story" as "exactly the kind of lawsuit ... that all can agree has been subjected by the Legislature to early testing of its merits and to early appeals." *Polk Cnty. Publ'g Co. v. Coleman*, 685 S.W.3d 71, 76 (Tex. 2024). The same can be said of Rep. Curry's lawsuit here against a political committee for its critical communications.

#### b. This motion is timely filed.

This motion is timely filed. Plaintiffs' attempted service upon the PAC on February 5, 2025, was defective. The citation identifies the PAC's agent for service as Stella Deen at 441 North Lee Street, Suite 100, Alexandria, Virginia 22134 (Def's Appx. 105), but Plaintiffs' return of service reflects that process was served upon Trey Mayfield, "attorney at Juris Day Attorneys," at 10521 Judicial Dr, 200-A, Fairfax, VA

<sup>&</sup>lt;sup>4</sup> The basic associational principle underlying political committees was expressed by the Supreme Court in *Citizens Against Rent Control/Coal. for Fair Hous. v. City of Berkeley, Cal.*, 454 U.S. 290, 294 (1981):

We begin by recalling that the practice of persons sharing common views banding together to achieve a common end is deeply embedded in the American political process. The 18th-century Committees of Correspondence and the pamphleteers were early examples of this phenomena and the Federalist Papers were perhaps the most significant and lasting example. The tradition of volunteer committees for collective action has manifested itself in myriad community and public activities; in the political process it can focus on a candidate or on a ballot measure. Its value is that by collective effort individuals can make their views known, when, individually, their voices would be faint or lost.

22030 (Def's Appx. 106). "[A] corporation is not a person capable of accepting process, and it must be served through its agents." All Com. Floors, Inc. v. Barton & Rasor, 97 S.W.3d 723, 727 (Tex. App.—Fort Worth 2003, no pet.). When the citation names one person as agent for service, but the return of service shows it was served on another person, the trial court does not acquire jurisdiction over the defendant. Uvalde Country Club v. Martin Linen Supply Co., 690 S.W.2d 884 (Tex. 1985) (per curiam) (citation identified "Henry Bunting, Jr.," as agent, but return of service reported "Henry Bunting"; service invalid because record did not affirmatively establish the latter was authorized to receive service for country club); Pharmakinetics Labs v. Katz, 717 S.W.2d 704, 706 (Tex. App.-San Antonio 1986, no writ); Hall v. Mansfield Indep. Sch. Dist., No. 02-24-00201-CV, 2024 WL 5162468, at \*4 (Tex. App.—Fort Worth Dec. 19, 2024) (citation identified school district superintendent as agent for service, but return reflects service upon different individual, who was neither the superintendent nor president of school board (the other statutory agent of a school district for service of process)); GEICO Cnty. Mut. Ins. Co. v. Kuye, No. 01-21-00393-CV, 2022 WL 3452324, at \*3-4 (Tex. App.—Houston [1st Dist.] Aug. 18, 2022, no pet.) (mem. op.) (collecting cases).

The office address at which Service was alleged to have occurred became the office address of the PAC pursuant to filings made with the FEC on January 29, 2025, shortly after issuance of the citation. The address is also that of PAC Management Services LLC, an FEC compliance firm for which Stella Deen is an independent contractor, and by the law firm of Chalmers, Adams, Backer & Kaufman LLC (CABK), which represents PAC Management Services LLC for certain matters. The PAC was not a client of CABK at the time of service. Mr. Mayfield joined as a Member of CABK in 2024, but neither Mayfield nor "Juris Day Attorneys," his former firm, nor CABK, is or was a formal designated agent for service of process for the PAC. The process server's statement in the Affidavit of Service that Mayfield is "authorized by appointment or by law to receive service of process for Courageous Conservatives PAC" (Def's Appx. 106) is incorrect and presented without any foundation. Likewise, the server's statement, "Confirmed that they accept legal documents for Courageous Conservatives PAC"-which the server does not attribute to any particular individual—is incorrect and lacks any foundation. See Def's Appx. 106. While Mayfield acknowledges receiving a document directed to the PAC, he did not have any substantive conversation with the process server, did not know what the document was, and did not represent that he could accept formal service of process. For all Mayfield knew, the document could have simply been a compliance notice from a regulatory body.<sup>5</sup> Plaintiffs have not, and cannot, demonstrate the person upon whom service was attempted was, in fact, the registered agent. *Pharmakinetics Labs.*, 717 S.W.2d ("It should be noted that when serving an agent for a corporation or other entity, the citation must affirmatively show that the individual served is in fact the agent for service."). Further, even if Mayfield had been an attorney representing the PAC on February 5 (as stated above, neither Mayfield nor CABK represented the

<sup>&</sup>lt;sup>5</sup> Plaintiffs have no basis on which to challenge these facts, but in the event they move to strike the motion for timeliness, Defendant will respond appropriately.

PAC at the time), and even if, as the PAC's attorney he knowingly agreed to accept process, such delivery still would not have satisfied Plaintiff's burden to establish formal service without a formal written acceptance of service, signed by Mayfield, filed on the docket. Tex. R. Civ. P. 119; *Grant v. Pivot Tech. Sols., Ltd.*, 556 S.W.3d 865, 886 (Tex. App.—Austin 2018, pet. denied), *superseded by statute on other grounds as recognized in McLane Baseball Champions v. Houston Baseball Partners LLC*, (Tex. 2023) ("In the absence of such a [TRCP 119] memorandum of service, however, the trial court could not have concluded that these defendants, or their attorney on their behalf, ever agreed to accept or waive service of process prior to the filing of their answer.").

While the attempted service on February 5 was defective, the PAC validly waived service upon voluntarily filing its Answer on March 3, 2025. Tex. R. Civ. P. 121 (filing of answer "dispens[es] with the necessity for the issuance or service of citation upon him"); *Grant*, 556 S.W.3d at 886. Consequently, the 60-day deadline in CPRC 27.003(b) began to run as of March 3. Grant, supra, at 886 (60-day deadline to file motion to dismiss under TCPA began to run when defendant voluntarily filed answer); *Jordan v. Hall*, 510 S.W.3d 194, 198 (Tex. App.—Houston [1st Dist.] 2016, no pet.), *overruled on other grounds, Montelongo v. Abrea*, 622 S.W.3d 290 (Tex.2021) (same). This motion is filed well within the 60-day period.

#### IV. Curry Cannot Establish a Prima Facie Case for Any of His Claims

Upset over Courageous Conservatives PAC's public messaging in December 2024 regarding the House's then-imminent vote for speaker, Curry filed this lawsuit

lodging a bevy of claims. Most of Curry's claims are predicated on the suggestion that Defendant's expenditures for the messages violate the Election Code. However, as explained herein, Texas law has long treated expenditures regarding the competition for House speaker as categorically distinct from the public elections governed under title 15 of the Election Code. Accordingly, Defendant's communications do not implicate title 15 (or other provisions) of the Election Code *at all*. Curry, therefore, cannot make a prima facie case for any Election Code violations. Defendants' messages, if anything, implicate Chapter 302 of the Government Code, which *does* specifically regulate expenditures intended to influence the election or defeat of a speaker candidate. However, Curry has no cause of action under Chapter 302 because he has no statutory standing to enforce Chapter 302, which—in any event—is unconstitutional to the extent it would purport to prohibit the communications at issue.

# a. Curry cannot establish any Election Code violations to support an injunction.

Notably, Curry's petition betrays his own uncertainty as to whether the Election Code even applies to Defendant's activity. In his "Summary of Claims for Relief," he alleges "Defendants caused to be sent ... text messages containing *political advocacy* ... without the disclosures required to accompany such advertisement as provided by Title 15 of the Tex. Elec. Code, *and/or* in violation of Title 3, Chapter 302 of the Tex. Gov't Code rules governing races for Speaker of the House." Orig. Pet. ¶1 (emphasis added). To be sure, this is a summary, and alternative pleading is permitted in typical Texas practice. But a review of the Election Code forecloses any

suggestion the PAC's expenditures are implicated anywhere in Title 15, and a lawsuit by a sitting officeholder to shut down critical speech by a political committee is anything but a typical civil action.

Curry seeks an injunction under Election Code § 273.081, which pertains only to a "violation or threatened violation of *this* code," *i.e.*, the Election Code. Orig. Pet. ¶¶3, 55-56, 69. He suggests Courageous Conservatives PAC violated Election Code § 252.001 by "fail[ing] to file a treasurer designation prior to expending the funds used to send these messages." Orig. Pet. ¶64; *see also id.* at ¶¶47-51. But this allegation wholly ignores the *specific* definitions and provisions in the Election Code distinguishing, quite appropriately, between Texas political committees and "out of state political committees,." *and* ignores the very information contained in the PAC's FEC reports—reports that Curry relies upon but mischaracterizes. See Orig. Pet. ¶¶50, 51. Courageous Conservatives PAC was not required to appoint a treasurer because it is an "out-of-state political committee," and its expenditures for the text messages communicating with Curry's constituents did not otherwise incur any Texas filing obligation.

# i. The PAC is an "out-of-state political committee" expressly exempted from filing obligations.

An "out-of-state political committee" is not required to designate a treasurer under chapter 252 or file reports of its activity (with a Texas authority) unless it "performs an activity that removes the committee from out-of-state status as defined by Section 251.001(15)." Tex. Elec. Code §§ 251.005(a), (c).

"Out-of-state political committee" means a political committee that:

(A) makes political expenditures outside this state; and

(B) in the 12 months immediately preceding the making of a *political expenditure* by the committee inside this state (other than an expenditure made in connection with a campaign for a federal office or made for a federal officeholder), makes 80 percent or more of the committee's total political expenditures in any combination of elections outside this state and federal offices not voted on in this state.

Tex. Elec. Code § 251.001(15). The Texas Ethics Commission has promulgated a

rule—conspicuously unmentioned in Curry's petition—explaining in detail how this

calculation is to be performed. That rule provides:

A political committee must determine if it is an "out-of-state political committee" each time the political committee plans to make a *political expenditure* in Texas (other than an expenditure in connection with a campaign for a federal office or an expenditure for a federal officeholder). The determination is made as follows.

(1) Before making the expenditure (other than an expenditure in connection with a campaign for a federal office or an expenditure for a federal officeholder), the committee must calculate its total political expenditures made during the 12 months immediately preceding the date of the planned expenditure. This total does not include the planned political expenditure triggering the calculation requirement.

(2) If 80% or more of the total political expenditures are in connection with elections not voted on in Texas, the committee is an out-of-state committee.

(3) If less than 80% of the total political expenditures are in connection with elections not voted on in Texas, the committee is no longer an out-of-state committee.

1 Tex. Admin. Code § 20.13(c) (emphasis added).

Courageous Conservatives PAC is an "out-of-state political committee." As

Plaintiffs acknowledge, Defendant is registered with the FEC (since 2015) and, as its

campaign finance reports filed with the FEC show, makes expenditures supporting

and opposing federal and nonfederal candidates outside Texas. (Courageous

Conservative PAC reports filed with the FEC, covering July 1, 2023 through

December 31, 2024, are included in Def's Appx.<sup>6</sup> These, and all prior reports, are available via the FEC website linked above.). The expenditures for the text messages at issue were made in December 2024 (in-kind contributions from Christopher Ekstrom, described as "In Kind – In Kind Non Federal Digital Advertising").<sup>7</sup> Ekstrom has averred that the texts regarding Curry were distributed first, and therefore the expenditure of \$2,711.61 reflects that expenditure in early December 2024. Ekstrom decl. ¶6. Even if this was a "political expenditure" as defined in title 15 (it is demonstrably not, as explained above), Election Code § 251.001(15) and Rule 20.13 explain that the PAC would only lose its out-of-state status if, in the 12 monthperiod before this expenditure, "less than 80% of [its] total political expenditures are in connection with elections not voted on in Texas." A review of the PAC's FEC-filed reports (Def's Appx. 005-104) demonstrates that far more than 80% of its political expenditures were for elections not voted on in Texas. Specifically, the PAC made only \$2,000 in political expenditures on races voted on in Texas in the 12-month period, but well over \$160,000 in political expenditures in races not voted on in

<sup>&</sup>lt;sup>6</sup> Defendant has removed the "Schedule C" pages from all reports included in the Appendix except for in the last report included (the 2024 Year End report). These pages pertain merely to loans which Mr. Ekstrom has made to the PAC, and are regenerated and included in each FEC report. They represent more than 20 pages per report and have been excluded from the Appendix to avoid unnecessary duplication, but are available in the full reports as presented on the FEC website.

<sup>&</sup>lt;sup>7</sup> In FEC reporting, in-kind contributions (contributions where the contributor pays a vendor directly for a reportable expenditure on behalf of the PAC) are reported both on the contribution ledger as in-kind contributions and on the disbursement ledger, because such is necessary to balance the bottom line.

Texas.<sup>8</sup>

# ii. The PAC's communications regarding the Speaker's race are not regulated under title 15 *whatsoever*.

The foregoing section demonstrates the PAC retains its "out of state" status and was not required to appoint a treasurer. This section explains that the text expenditure itself is not regulated under title 15 at all, and therefore Curry cannot make any prima facie case of *any* title 15 violation.<sup>9</sup>

Title 15, which regulates the campaign finances of candidates as well as political party committees, political committees, and other individuals/persons making *relevant* contributions or expenditures, contains a definitional section. For purposes of "this title," "[p]olitical expenditure' means a *campaign expenditure* or an *officeholder expenditure*." Tex. Elec. Code §§ 251.001, 251.001(10) (emphasis added). "Campaign expenditure' means an expenditure made by any person in connection with a campaign for an elective office or on a measure." *Id.* § 251.001(7).<sup>10</sup> But Speaker of the Texas House of Representatives is not an "elective office" or a

<sup>&</sup>lt;sup>8</sup> The \$2,000 is comprised of two separate \$1,000 disbursements supporting Trump for President on October 15, 2024 (Pre-General Report) (Def's Appx. 135) and on October 29, 2024 (Post-General Report) (Def's Appx. 60). Defendant made no disbursements in the first quarter of 2024. See Def's Appx. 19. Its July 2024 Quarterly FEC report alone (covering 4/1/24-6/30/24) reflects more than \$150,000 in Schedule E independent expenditures supporting and opposing candidates for Virginia Congressional District 5 and \$10,000 in contributions to a PAC in Ohio and a nonfederal committee in South Carolina. Def's Appx. 24, 28-39. Its next report, covering July 1-10, 2024, shows Defendant paid \$8,450 opposing a candidate for Arizona's 1<sup>st</sup> Congressional District. Def's Appx. 47.

<sup>&</sup>lt;sup>9</sup> The same analysis applies to all the PAC's expenditures for text messages, i.e., those regarding Leach and Hull as well as Curry. However, Curry has no standing, even under his purported theories, to raise any "harm" caused to other Members, and therefore those messages are irrelevant for this analysis.

<sup>&</sup>lt;sup>10</sup> There is no allegation "officeholder expenditures" are at issue here.

measure<sup>11</sup> within the purview of title 15.

Section 252.005 confirms this point, because it identifies the authority with whom a candidate incurring filing obligations under title 15 must file his or her treasurer designation (and, consequently, his or her finance reports). The provision includes several subsections listing candidates by category, but candidate for House Speaker does not fit within any such category. There is even a catch-all provision, but it applies only to candidates for officers of certain "political subdivisions" spanning more than one county, which clearly would not include Speaker of the House. Tex. Elec. Code § 252.005(5). This provision is directly relevant to where *political* committees incurring a filing obligation must file their treasurer appointments (and subsequent reports), because depending on the nature of the political committee, the appointment is required to be filed either with the same authority with whom the relevant candidate (supported or opposed by the committee) files (if a specific-purpose committee), or with the Texas Ethics Commission (if a general-purpose committee). Id. §§ 252.006, .007. In other words, if expenditures advocating the election or defeat of a House Speaker candidate came within the purview of title 15, Speaker candidates would be accounted for within § 252.005; they would be required to appoint a treasurer under chapter 252 and file reports under chapter 254. But Speaker candidates are not accounted for there, because the office of Speaker of the House is

<sup>&</sup>lt;sup>11</sup> "Measure' means a question or proposal submitted in an election for an expression of the voters' will and includes the circulation and submission of a petition to determine whether a question or proposal is required to be submitted in an election for an expression of the voters' will." "Voters' will" in the title 15 context plainly refers to the electorate at large in the elections held pursuant to title 15, not to the Members of the House voting in session, and Plaintiffs have not alleged otherwise.

not an elective office within the purview of title 15.

Instead, Speaker candidates, and financial transactions related to Speaker elections, have always been regulated under separate provisions of Texas law. They are dealt with in Chapter 302 of the Government Code, subchapter B of which is entitled, "Candidate for Speaker: Campaign Finance." The subchapter includes its own set of definitions, including a definition of "campaign expenditure" (which differs from the definition given in Election Code title 15), and its own penalties and enforcement provisions. Tex. Gov't Code §§ 302.021, .022. Indeed, in prior litigation, the Texas Ethics Commission, represented by the Texas Attorney General, took the position on the record that "[t]he Speaker's race is an *internal legislative affair*, not a general election," distinguishing the "campaign" for speaker, which pertains to "an internal vote by the 150 members of the House," from independent expenditures in "support of candidates for popular vote." (Def's Appx. 117-18) (Tex. Ethics Com'n Defendants' Resp. to Mtn. for Prelim. Inj. [ECF No. 31], filed in Free Market Found. v. Reisman, No. 1:08-cv-116-SS (W.D. Tex. Feb. 28, 2008). The Ethics Commission defendants in that case argued that group-funded independent expenditures regarding the House speaker's race and directed to the public (rather than expenditures for direct communications with legislators) would be subject to *lobbying* regulations under Government Code chapter 305.12 While the federal district court

<sup>&</sup>lt;sup>12</sup> Chapter 305 applies to a group "who, by direct communication with government officers, engage in efforts to persuade members of the legislative or executive branch to take specific actions." Tex. Gov't Code § 305.001; see also id. §§ 305.003(a)(1); 305.006(b). But Defendant here sought to influence the speaker's race by communication with the public, calling upon concerned and like-minded individuals to express their views to legislators-elect.

did not accept that argument (instead holding such expenditures would fall under Chapter 302 and proceeding to declare statutory limits on such expenditures unenforceable, *nobody* in the case argued such expenditures were regulated by title 15. *See Def's Appx. 110-120.*; *see also Free Mkt. Found.*, 573 F.Supp.2d at 955.

The PAC's paid text messages, on their face, clearly oppose Dustin Burrows as Speaker and urge recipients to contact Curry "to demand that [he] fulfill his promise to Texas." Plfs' Appx. 1. Curry acknowledges the text message urged recipients to contact him and "ask him to oppose Rep. Burrows for Speaker of the House" and, as he understood it, to "cast his vote for Rep. Cook." Orig. Pet. ¶32. He characterizes the communication as "part of a campaign to harass and cajole him into feeling the pressure of outside forces attempting to direct his vote at all times," *id.* ¶3 (the "outside forces" being, of course, his Republican constituents). On their face and according to Curry's own petition, therefore, the text messages were not "campaign expenditures" under title 15 because they were not made "in connection with a campaign for an elective office or on a measure." Tex. Elec. Code § 251.001(7). They were, instead, pure issue advocacy outside the purview of title 15.

The enforcement provisions of Chapter 302 provide no civil enforcement mechanism that would support this lawsuit; Curry therefore has no cause of action affording him standing to sue Defendant over its communications. Whether a TCPA non-movant has a private right of action to assert a claim is a merits question and an element on which Curry must establish prima facie to avoid dismissal. *Texas Right to Life v. Van Stean*, 702 S.W.3d 348, 353-54 (Tex. 2024). Without statutory standing

supporting a cause of action, Curry cannot establish the first element of his suit challenging the PAC's spending on the communications at issue.

Curry also tangentially-hesitatingly-refers to potential violations of Election Code §§ 253.034, .0341 (prohibiting "knowingly mak[ing] a political contribution" within 30 days of session to a member of the legislature), Orig. Pet. ¶67, but then notes even David Cook disavows the notion of any coordination that would have made the expenditures *contributions* to Cook. See Tex. Elec. Code § 251.001(8) ("A campaign expenditure does not constitute a contribution by the person making the expenditure to a candidate or officeholder if the expenditure is made without the prior consent or approval of the candidate or officeholder on whose behalf the expenditure is made."). Defendant's declaration by Mr. Ekstrom states unequivocally the PAC did not seek or receive consent or authorization from Cook or any other speaker candidate for the communications at issue. Ekstrom decl. ¶8. Curry himself acknowledges that he has no evidence that the paid texts were in-kind contributions to anyone; he even admits that Cook himself disavows the notion. He clearly can make no prima facie case for such a violation-even if the text were a campaign expenditure.

#### b. Political advertising without required disclaimer

Curry claims the PAC's communications are "political advertising" under

Election Code §  $251.001(16)^{13}$  and therefore required the political advertising disclaimer required by § 255.001 (though he mis-cites the relevant statute in the petition as § 255.003). See Orig. Pet. ¶¶ 61-62. Curry cannot establish a prima facie case the communications are "political advertising" requiring any disclosure under § 255.001.

First, the messages plainly fall outside the limited application of § 255.001 according to its text. The provision only requires the disclosure on certain "political advertising containing express advocacy." *Id.* § 255.001(a). "Express advocacy" is not defined in the statute, but derived from Supreme Court caselaw described by the Texas Supreme Court as limited to "communications containing express words of advocacy of election or defeat, such as 'vote for,' 'elect,' 'support,' 'cast your ballot for,' 'Smith for Congress,' 'vote against,' 'defeat,' 'reject.' " *Osterberg v. Peca*, 12 S.W.3d 31, 52 (Tex. 2000) (quoting *Buckley v. Valeo*, 424 U.S. 1, 44 n. 52 (1976) (per curiam)). *Osterberg* continued: "In *Massachusetts Citizens for Life*, the Court clarified that a message can be "marginally less direct" than the examples listed in *Buckley* so long

<sup>&</sup>lt;sup>13</sup> "Political advertising" means a communication supporting or opposing a candidate for nomination or election to a public office or office of a political party, a political party, a public officer, or a measure that:

<sup>(</sup>A) in return for consideration, is published in a newspaper, magazine, or other periodical or is broadcast by radio or television; or

<sup>(</sup>B) appears:

<sup>(</sup>i) in a pamphlet, circular, flier, billboard or other sign, bumper sticker, or similar form of written communication; or

<sup>(</sup>ii) on an Internet website.

Tex. Elec. Code § 251.001(16).

as its essential nature "goes beyond issue discussion to express electoral advocacy." *Id.* 

The PAC's communications here—by Curry's admission—advocate a position on a legislative debate/vote, not a candidate election for title 15 purposes—and therefore are not "express advocacy" under title 15. Lastly, while the statute states that "political advertising" authorized by "... a political committee filing reports under [title 15] shall be deemed to contain express advocacy," Tex. Elec. Code § 255.001(b), Courageous Conservatives PAC does not file reports under title 15.

Nonetheless—even if § 255.001 were applicable—Curry's allegation seems misleading on its face, because the text messages *do* contain the "political advertising" disclaimer, in the text at the bottom of the image. Curry claims it is illegible but counsel can read it even in the very poor-quality copy of the exhibits attached to Plaintiff's petition, in the Facebook post and the text messages. Moreover, with regard to text messages containing an image (as these do), a recipient can open the image and zoom in to enlarge the text if he or she requires additional visual assistance. Curry does not even purport to explain his claim that these legible disclaimers are illegible. Accordingly, even if these messages were "political advertising" containing "express advocacy" requiring a disclosure, any necessary information is already there.

#### c. Curry cannot establish a claim for damages under TEC § 253.131.

Curry seeks damages under Election Code § 253.131. The statute provides:

(a) A person who knowingly makes or accepts a campaign contribution or makes a campaign expenditure in violation of this chapter is liable

for damages as provided by this section.

(b) If the contribution or expenditure is in support of a candidate, each opposing candidate whose name appears on the ballot is entitled to recover damages under this section.

(c) If the contribution or expenditure is in opposition to a candidate, the candidate is entitled to recover damages under this section.

For the reasons given above, this provision is entirely inapplicable because the expenditures at issue are not "campaign expenditures" and not otherwise in violation of "this chapter," because such chapter does not apply at all.

But even if § 253.131 did apply to communications regarding the vote for House speaker (which it does not), Curry still has no claim for damages here. Even if the communication criticizing Curry's posturing on the Speaker vote were construed as "supporting" David Cook (or some other Speaker candidate), Curry was not a candidate for speaker himself, and therefore has no claim under subsection (b). And if the communications were interpreted as in opposition to Dustin Burrows as Speaker (which would not apply because speaker candidates are not "candidates" for title 15 purposes), then Curry would not have a claim for damages himself under subsection (c). Nor can the communications be construed as opposing Curry himself as a "candidate" in any relevant sense; he was not a candidate for re-election or otherwise in December 2024. Accordingly, Curry cannot establish the first element of his claim for damages under § 253.131—the existence of a private right of action on his behalf—and his claim must be dismissed. *Tex. Right to Life*, 702 S.W.3d at 353-54.

# d. Curry cannot establish that Government Code Chapter 302 prohibits Defendant's communications about the Speaker's race.

Curry alleges that he does not have sufficient information to know, but suggests that the PAC may have violated Chapter 302's "prohibition on the expenditure of funds collected under [title] 15 of the [Election Code] on a race for Speaker of the House." Orig. Pet. ¶68. This is a reference to Tex. Gov't Code § 302.021(e-1), providing that "[a] person commits an offense if the person knowingly makes a contribution to a speaker candidate's campaign or an expenditure to aid or defeat a speaker candidate from political contributions, interest earned on political contributions, or an asset purchased with political contributions in violation of Section 302.0191."

First, as explained above, Curry cannot make any prima facie case establishing a violation of Chapter 302 because he has no private right of action to enforce the Chapter (the first element for TCPA purposes), and this claim must be dismissed. Accordingly, any potential violation of Chapter 302 is irrelevant in this case.

Nonetheless, even if Chapter 302 were properly before the Court, to the extent that Chapter 302 prohibits Defendant's communications about the Speaker race (see Orig. Pet. ¶¶ 52, 68), especially the fully independent communications at issue here, the statute is unconstitutional and unenforceable. Texas has no cognizable interest in prohibiting independent speech (uncoordinated with any relevant candidate for Speaker or even any other House Member), regardless of whether such speech is funded with title 15 "political contributions." The only legitimate government interest that can support limits on expenditures of campaign funds is the interest in preventing quid pro quo corruption or its appearance. *McCutcheon v. FEC*, 572 U.S.

185, 207-08 (2014). Expenditures, even if fully candidate-election-related (advocating the election or defeat of a candidate in a popular vote) present no cognizable threat of quid pro quo corruption that would justify any limitation on such expenditures, as a matter of law. Catholic Leadership Coal. of Tex. v. Reisman, 764 F.4th 409, 428-29 (5th Cir. 2014) ("The Supreme Court has been unequivocal that, as a matter of law, independent expenditures do not give rise to corruption or the appearance of corruption.") (Texas statute limiting a new PAC's uncoordinated campaign expenditures violates First Amendment); Texans for Free Enter. v. TEC, 732 F.3d 535, 537-38 (5th Cir. 2013). Accordingly, for the same reasons that the State may not prohibit corporate contributions to a PAC (or a corporation's own expenditures) for express advocacy, or limit the dollar amount of expenditures for independent speech or of contributions to a PAC to fund its independent expenditures, or impose temporal limitations on independent expenditures, the State may not prohibit independent communications related to the race for Speaker.

Moreover, a law prohibiting a political committee from using title 15 political contributions to speak about the selection of a Speaker is an express, content-based restriction (prohibiting PAC speech about the Speaker's race while allowing title 15 contributions to fund speech about popular candidate elections); Texas must therefore defend this distinction under strict scrutiny, which it cannot do. See Reed v. Town of Gilbert, Az., 576 U.S. 155 (2015). Accordingly, and essentially for the same reasons animating the holding in *Free Market Foundation v. Reisman*, 573 F.Supp.2d 952 (W.D. Tex. 2008), Government Code § 302.021(e-1) and § 302.0191 violate the First

Amendment and Texas constitutional speech guarantees.

The court need not reach this constitutional issue, however, because Curry's claims under Chapter 302 must be dismissed because he lacks a private right of action

### V. Affirmative Defenses

Even if Curry could make out a prima facie case for any claim, Defendant has several affirmative defenses, including that the relevant definitions of campaign contribution/expenditure, and political advertising, and out-of-state political committee, are void for vagueness if construed to be applicable to the communications at issue here; and any statute prohibiting these communications to the general public about matters of public concern under the Government Code chapters 302 or 305 (those at issue in *Free Market Foundation* and/or § 302.0191) is unconstitutional as a content-based prohibition on speech that fails strict or exacting scrutiny and/or as an impermissible restriction on political speech unsupported by any cognizable government interest and insufficiently tailored.

#### VI. Motion for Attorneys' Fees

Courageous Conservatives PAC requests its court costs and reasonable attorneys' fees incurred in this matter, pursuant to TCPA § 27.009 and/or Election Code § 253.131. Fees incurred so far include approximately 38 hours by Jerad Najvar (including preparing and filing the original answer, reviewing the many statutes put at issue by Curry's petition and related TEC Rules, researching TCPA requirements and standards including reviewing recent caselaw, drafting, communications with Trey Mayfield and the client to ascertain relevant facts), plus any additional time

incurred through the court's order on this motion and judgment, and anticipated fees for any interlocutory appeal or mandamus proceeding, and for potential litigation in the Texas Supreme Court, and for any petition for review by certiorari or otherwise to the U.S. Supreme Court should same be necessary.

Mr. Najvar will testify at the hearing on this motion based on his personal knowledge of the tasks performed by himself and any other CABK attorneys or paraprofessionals involved in defending this matter, his (and their) hourly rates, and the reasonableness and necessity of all work performed and billed. He will also testify as an expert on such matters. Mr. Najvar's current hourly rate for litigation in campaign finance or constitutional matters (his primary area of focus and experience) is \$500 (for a current, rough total of \$19,000). A summary of some of Mr. Najvar's relevant experience is attached. Def's Appx. 136-39.<sup>14</sup> CABK member Dan Backer<sup>15</sup> (current billing rate of \$750/hour) has spent approximately 6 hours (primarily communications with the client, strategic oversight and review/revision of draft pleadings and arguments) (aggregating to a preliminary total of \$4,500). Defendant reserves the right to amend and/or supplement its request for fees and provide additional evidence supporting same as necessary and appropriate as this matter progresses.

#### VII. Motion for Sanctions

Courageous Conservatives PAC further moves for sanctions. CPRC

<sup>&</sup>lt;sup>14</sup> A brief biography is at https://chalmersadams.com/attorneys/jerad-w-najvar/.

<sup>&</sup>lt;sup>15</sup> A brief biography is at https://chalmersadams.com/attorneys/dan-backer-2/.

§ 27.009(a)(2). Sanctions under the TCPA are limited to monetary sanctions that would be awarded to the Defendant (i.e., nonmonetary sanctions are not appropriate). Sanctions are fully warranted here for multiple reasons. *See* O'CONNOR'S TEXAS RULES: CIVIL TRIAL 2025 Ch. 5-K § 3.1.2(2) (describing factors for sanctions for pleading abuse).

First, Curry and his attorneys abused the pleading process. As noted above, they made factually insupportable claims, in particular claiming that the PAC's spending in the prior twelve months divested it of out of state committee status. This fact is demonstrably refuted by a simple review of the FEC filings. Inexplicably, Curry claimed that he reviewed the filings and that his allegations were predicated upon them, but if any review was undertaken, it was clearly cursory and irresponsible. Any reasonable party or attorney reviewing the FEC reports would easily see that Curry's allegation was false. And this false representation regarding the PAC's prior spending underlies Curry's primary complaint: that the PAC was subject to title 15 filing requirements. Curry's claim that the PAC lost its out of state status also completely ignores the very Rule on this topic promulgated by the Ethics Commission, 1 Tex. Admin. Code § 20.13. The application of that Rule, which was left out of Curry's half-baked petition, forecloses the claim that the PAC became subject to the treasurer appointment requirement. Curry also alleges violations of the "political advertising" disclosure requirement under 255.001 but ignored the "express advocacy" limitation to same, which precludes its application here. Curry proceeds to claim damages under § 253.131, despite the fact that he is not even within the class of potential damages plaintiffs, as explained above, and therefore has no private cause of action. Curry's lawsuit is unfounded but served as a springboard for him to allege nefarious activity and statutory violations against a political association opposed to certain of his policy preferences.

Another factor is any history of sanctionable conduct by the offender. It should be considered in this regard that Pat Curry has a demonstrated history of fraudulent activity, specifically in attempting to defraud an opponent in litigation. A jury determined that Pat Curry was personally liable for fraudulent transfers of assets which he undertook in an attempt to avoid paying a judgment for sexual harassment and retaliatory discharge. *See Key v. Richards*, No. 03-14-00116-CV, 2016 WL 240773 (Tex. App.—Austin 2016) (mem. op.) (Def's Appx. 122-27) (affirming fraudulent transfer finding and individual liability for Curry and partner) (holding, among other things, "We conclude that the jury's affirmative finding in Question 1 that a fraudulent transfer occurred, combined with an affirmative finding to Questions 2 and 3 finding Key and Curry responsible for such tortious conduct, support imposing individual liability on Key and Curry."). Sanctions are warranted to dissuade Pat Curry from his apparent penchant for dishonest behavior in Texas courts.

The PAC reserves the right to supplement and elaborate on the request for sanctions as appropriate.

#### VIII. Prayer

Defendant respectfully requests that the Court dismiss all of Plaintiffs' claims under the TCPA; award reasonable attorneys' fees, costs, and expenses, pursuant to

the TCPA or any other applicable authority, an additional award of monetary sanctions against Curry, and any further relief to which Defendant may be entitled.

Respectfully submitted,

Jerad Wayne Najvar Texas Bar No. 24068079 CHALMERS, ADAMS, BACKER & KAUFMAN LLC 2180 North Loop West, Ste. 255 Houston, TX 77018 [Tel.] (281) 404-4696 jnajvar@chalmersadams.com

### **<u>Certificate of Service</u>**

I hereby certify that a true and correct copy of the foregoing document, and any accompanying exhibit(s)/appendix, was served on April 9, 2025, by means of the court's e-filing system, upon all counsel of record.

Amy Miller amy@guestandgray.com *Counsel for Pat Curry* 

Elizabeth Alvarez alvarez@guestandgray.com Counsel for Curry for Texas

> <u>/s/ Jerad Najvar</u> Jerad Najvar

### NO. 2025-131-3

HON. PAT CURRY, STATE	§	IN THE 74th
REPRESENTATIVE FOR HOUSE	§	
DISTRICT 56, and CURRY FOR	§	
TEXAS (A CAMPAIGN),	§	
	§	
Plaintiffs,	§	
	§	
v.	§	
	§	JUDICIAL DISTRICT OF
COURAGEOUS CONSERVATIVES	§	
PAC, CHRISTOPHER EKSTROM,	§	
CHAIRMAN, and JOHN OR JANE	§	
DOES #1-5,	§	MCLENNAN COUNTY, TEX.
	§	
Defendants.	§	

## Defendant's Appendix to Motion to Dismiss Under TCPA

NO.	Description	Appx. Pages
1	Unsworn declaration of Christopher Ekstrom for Courageous Conservatives PAC	001-004
2	Courageous Conservatives PAC FEC reports (covering 7/1/2023 – 12/31/2024): 2023 Year End 2024 April quarterly 2024 July quarterly 2024 Pre-Primary 2024 Oct quarterly 2024 Pre-General [included as item 7, below] 2024 Post-General 2024 Year End	005-104
3	Citation to Courageous Conservatives PAC	105
4	Affidavit of Service as to Courageous Conservatives PAC	106-109
5	TEC Defendants' Resp. to Mtn. for Prelim. Inj., filed in Free Market Found. v. Reisman (W.D. Tex. 2008)	110-121
6	Key v. Richards, Third Court of Appeals (2016)	122-127
7	Courageous Conservatives PAC FEC – Pre-General Report excerpts (covering 10/1/24 – 10/16/24)	128-135
8	Jerad Najvar Campaign Finance Experience re attorneys' fees	136-139

## Table of Contents: Appendix

#### NO. 2025-131-3

HON. PAT CURRY, STATE	§	IN THE 74th
REPRESENTATIVE FOR HOUSE	§	
DISTRICT 56, and CURRY FOR	§	
TEXAS (A CAMPAIGN),	Š	
	§	
Plaintiffs,	§	
	§	
v.	§	
	§	JUDICIAL DISTRICT OF
COURAGEOUS CONSERVATIVES	§	
PAC, CHRISTOPHER EKSTROM,	§	
CHAIRMAN, and JOHN OR JANE	§	
DOES #1-5,	§	MCLENNAN COUNTY, TEX.
	§	
Defendants.	§	

#### <u>Declaration of Christopher Ekstrom on Behalf of Courageous</u> <u>Conservatives PAC, Pursuant to Texas Civ. Prac. & Rem. Code 132.001</u>

1. I am the Chairman of Courageous Conservatives PAC, a defendant in the above-captioned matter, which was registered with the Federal Election Commission in 2015.

2. Courageous Conservatives PAC has engaged and continues to engage in paying for communications supporting and opposing federal and nonfederal candidates in various states throughout the United States, as reflected on its campaign finance reports.

3. Courageous Conservatives PAC distributed the communications reflected in Plaintiffs' Appendix, filed with their Original Petition, via text message and Facebook posts on the PAC's Facebook page (regarding Pat Curry, Jeff Leach, and Lacey Hull).

4. There was no cost associated with the Facebook posts. These were simply posted on the PAC Facebook page and the PAC did not pay any fee to boost them or otherwise pay for distribution.

5. Courageous Conservatives PAC did pay a vendor to distribute the text messages to a list of registered Republican voters in each respective legislator's district, urging the recipients to contact their House member regarding his or her position and upcoming vote for House speaker (as reflected in the messages themselves). As reflected in the relevant FEC reports, I made an in-kind contribution of my personal funds to the PAC by way of payment on its behalf to a vendor to distribute the messages.

6. The texts and Facebook messages referencing Pat Curry were distributed before the messages regarding Hull or Leach. The costs for the text messages regarding Curry cost \$2,711.61 and are reported as an in-kind contribution to Courageous Conservatives PAC for "Non Federal Digital Advertising."

7. Courageous Conservatives PAC used Curry's personal cell phone number in the message because the matter was extremely urgent considering the fluid nature of the race for House speaker, the news cycles considering the same, and since Curry was approaching his inaugural term as a Member of the House, I was uncertain of his district or Capitol office number and wanted to ensure that recipients of the message had a way to contact him regarding his position on House speaker. His cell number was readily available on the internet.

8. Neither I nor anyone else on behalf of Courageous Conservatives PAC ever spoke with Representative David Cook or any other prospective candidate for House speaker, nor with anyone from Cook's (or any prospective speaker candidate's) official

Defs' Appx. 2

or campaign staff or other agents, regarding the PAC's plans or expenditures. The communications at issue were planned, designed, and distributed independently by the PAC, without any consent or authorization from Cook or any other potential or prospective House speaker candidate.

My name is Christopher Ekstrom, my date of birth is 11/29/1967, and my address is 12060 NW 62<sup>nd</sup> Court, Coral Springs, FL 33076. I declare under penalty of perjury that the foregoing is true and correct.

Executed in Broward County, State of Florida, on the 7<sup>th</sup> day of April, 2025.

Signature:

Christopher Ekstrom (Apr 7, 2025 22:54 EDT)

Christopher Ekstrom

# UNITED STATES DISTRICT COURT

Final Audit Report

2025-04-08

Created:	2025-04-08
Ву:	Jerad Najvar (jnajvar@chalmersadams.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAAgWbON-OqSN1Z8dftrjG6wbnp_DMD-2jV

## "UNITED STATES DISTRICT COURT" History

- Document created by Jerad Najvar (jnajvar@chalmersadams.com) 2025-04-08 2:51:57 AM GMT- IP address: 98.196.52.129
- Document emailed to Christopher Ekstrom (csekstrom@aol.com) for signature 2025-04-08 2:52:01 AM GMT
- Email viewed by Christopher Ekstrom (csekstrom@aol.com) 2025-04-08 - 2:53:23 AM GMT- IP address: 104.28.110.104
- Document e-signed by Christopher Ekstrom (csekstrom@aol.com) Signature Date: 2025-04-08 - 2:54:07 AM GMT - Time Source: server- IP address: 97.213.38.234

Agreement completed. 2025-04-08 - 2:54:07 AM GMT



Image# 202401049599970806
---------------------------

#### 01/04/2024 12 : 01

PAGE 1 / 48

FEC FORM 3X	AND	ORT OF DISBUR er Than An Autl	SEMEN	rs	Off	fice Use Only	Γ
1. NAME OF COMMITTEE (in	-	PRINT ▼	Example: If ty over the lines		12FE4M5		
COURAGEOU	SCONSERVA	TIVES PAC					
ADDRESS (number and	d street)						
Check if diffe than previous reported. (AC	sly Marito	n 1			NJ (	08053             -	
2. FEC IDENTIFIC	ATION NUMBER	CIT	Y ▲	S		ZIP CODI	E 🔺
C C0058702	2		EPORT X	NEW (N) <b>OR</b>	AMENI (A)	DED	
<ul> <li><b>4. TYPE OF REP</b> (Choose One)</li> <li>(a) Quarterly Rep</li> </ul>	- (2) III Ri Di	eport ue On: Mar	20 (M2)	May 20 (M5) Jun 20 (M6) Jul 20 (M7)	Aug 20 ( Sep 20 ( Oct 20 (	(M9)	Nov 20 (M11) Non-Election (ear Only) Dec 20 (M12) Non-Election (ear Only) lan 31 (YE)
July 15 Quarterly October Quarterly	Report (Q3)	12-Day PRE-Election Report for the:	Primary (1 Convention	2P)	General (12G Special (12S)	à) <b>F</b>	Runoff (12R)
Year-Enc July 31 I Report (I Year Onl	I Report (YE) Mid-Year (d) Non-election y) (MY)	Electio 30-Day <b>POST</b> -Election Report for the:	n on General (3	30G)	Runoff (30R)	State of	pecial (30S)
(TER)	on Report	Electio	n on	/ D D /	Y Y Y Y	in the State of	
5. Covering Period		01 / Y Y Y 2023	Y through	12 M	/ D D / Y 31	2023	
I certify that I have ex		and to the best of Stella, , ,	my knowledge an	d belief it is true	e, correct and co	mplete.	
Type or Print Name o	f Treasurer						
Signature of Treasure	. Denn, Stella, , ,			Da	ate 01 /	04 / Y	2024 Y Y
NOTE: Submission of f	alse, erroneous, or ir	complete information	n may subject the p	erson signing thi	is Report to the p	enalties of 52 U	.S.C. § 30109
Office Use Only						FEC FORM Rev. 05/201	6
					Defs' /	Аррх.	5

#### SUMMARY PAGE OF RECEIPTS AND DISBURSEMENTS

Page 2

Write or Type Committee Name

FEC Form 3X (Rev. 05/2016)

_	COURAGEOUS CONSERVATIVE	ES PAC	
F	Report Covering the Period: From:	07 / D D / Y Y Y Y 01 2023 To:	12 / D D / Y Y Y Y 12 31 2023
		COLUMN A This Period	COLUMN B Calendar Year-to-Date
6.	(a) Cash on Hand January 1, 2023		9567.86
	(b) Cash on Hand at Beginning of Reporting Period	38253.84	
	(c) Total Receipts (from Line 19)	25000.00	69469.38
	<ul> <li>(d) Subtotal (add Lines 6(b) and</li> <li>6(c) for Column A and Lines</li> <li>6(a) and 6(c) for Column B)</li> </ul>	63253.84	79037.24
7.	Total Disbursements (from Line 31)	56002.58	71785.98
8.	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	7251.26	7251.26
9.	Debts and Obligations Owed <b>TO</b> the Committee (Itemize all on Schedule C and/or Schedule D)	0.00	
10	Debts and Obligations Owed <b>BY</b> the Committee (Itemize all on Schedule C and/or Schedule D)	324251.32	

This committee has qualified as a multicandidate committee. (see FEC FORM 1M)

For further information, contact the Federal Election Commission at 800-424-9530 or visit www.fec.gov

Defs' Appx. 6

mano#	202401	049599	920808

### DETAILED SUMMARY PAGE

of Receipts

FEC Form 3X (Rev. 05/2016)

Write or Type Committee Name

### COURAGEOUS CONSERVATIVES PAC

Report Covering the Period: From:	01 / Y Y Y Y Y 2023 To:	12 / D D / Y Y Y Y 12 31 2023
I. Receipts	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
1. Contributions (other than loans) From:		
(a) Individuals/Persons Other Than Political Committees		
(i) Itemized (use Schedule A)	25000.00	25000.00
(ii) Uniterrined	0.00	0.00
(ii) Unitemized (iii) TOTAL (add		
Lines 11(a)(i) and (ii)	25000.00	25000.00
(b) Political Party Committees	0.00	0.00
(c) Other Political Committees	0.00	14469.38
(such as PACs)(d) Total Contributions (add Lines		
11(a)(iii), (b), and (c)) (Carry		
Totals to Line 33, page 5)	25000.00	39469.38
. Transfers From Affiliated/Other Party Committees	0.00	0.00
. All Loans Received	0.00	30000.00
		41 41 45
. Loan Repayments Received	0.00	0.00
. Offsets To Operating Expenditures		
(Refunds, Rebates, etc.) (Carry Totals to Line 37, page 5)	0.00	0.00
. Refunds of Contributions Made		
to Federal Candidates and Other		
Political Committees	0.00	0.00
. Other Federal Receipts (Dividends, Interest, etc.)	0.00	0.00
. Transfers from Non-Federal and Levin Funds		
(a) Non-Federal Account	0.00	0.00
(from Schedule H3)	0.00	
(b) Levin Funds (from Schedule H5)	0.00	0.00
(c) Total Transfers (add 18(a) and 18(b)).	0.00	0.00
<ul> <li>(c) Total Transfers (add 18(a) and 18(b))</li> <li>9. Total Receipts (add Lines 11(d),</li> </ul>	0.00	0.00
12, 13, 14, 15, 16, 17, and 18(c))	25000.00	69469.38
. Total Federal Receipts	25000.00	20102.00
(subtract Line 18(c) from Line 19)▶	25000.00	69469.38

Defs' Appx. 7

Page 3

of Disbursements

FEC Form 3X (Rev. 05/2016) Page 4 COLUMN A COLUMN B **II. Disbursements Total This Period Calendar Year-to-Date** 21. Operating Expenditures: Allocated Federal/Non-Federal (a) Activity (from Schedule H4) 0.00 0.00 Federal Share ..... (i) 0.00 0.00 (ii) Non-Federal Share..... (b) Other Federal Operating 5297.00 6093.55 Expenditures ..... (c) Total Operating Expenditures 6093.55 (add 21(a)(i), (a)(ii), and (b)) 5297.00 22. Transfers to Affiliated/Other Party Committees..... 0.00 0.00 23 Contributions to Federal Candidates/Committees 0.00 0.00 and Other Political Committees... 24. Independent Expenditures (use Schedule E).... Coordinated Party Expenditures (52 U.S.C. § 30116(d)) (use Schedule F).... 50705.58 65692.43 25. 0.00 0.00 26. Loan Repayments Made..... 0.00 0.00 Loans Made.... Refunds of Contributions To: (a) Individuals/Persons Other 0.00 27. 28. 0.00 Than Political Committees 0.00 0.00 (b) Political Party Committees ..... 0.00 0.00 Other Political Committees (C) (such as PACs)..... 0.00 0.00 Total Contribution Refunds (d) (add Lines 28(a), (b), and (c))...... 0.00 0.00 29. Other Disbursements (Including 0.00 Non-Federal Donations)..... 0.00 30. Federal Election Activity (52 U.S.C. § 30101(20)) (a) Allocated Federal Election Activity (from Schedule H6) (i) Federal Share .... 0.00 0.00 (ii) "Levin" Share..... 0.00 0.00 (b) Federal Election Activity Paid Entirely With Federal Funds ..... 0.00 0.00 Total Federal Election Activity (add (C) Lines 30(a)(i), 30(a)(ii) and 30(b)) ..... 0.00 0.00 31. Total Disbursements (add Lines 21(c), 22, 23, 24, 25, 26, 27, 28(d), 29 and 30(c)).. 56002.58 71785.98 32. Total Federal Disbursements (subtract Line 21(a)(ii) and Line 30(a)(ii) from Line 31)..... 56002.58 71785.98

of Disbursements

COLUMN A

**Total This Period** 

FFC	Form	3X	(Rev	05/2016	١
1 20	1 01111	57	(110 v.	05/2010	,

### III. Net Contributions/ Operating Expenditures

33.	Total Contributions (other than loans)
	(from Line 11(d), page 3)
34.	Total Contribution Refunds
	(from Line 28(d))
35.	Net Contributions (other than loans)
	(subtract Line 34 from Line 33)
36.	Total Federal Operating Expenditures
	(add Line 21(a)(i) and Line 21(b))
37.	Offsets to Operating Expenditures
	(from Line 15, page 3)
38.	Net Operating Expenditures

(subtract Line 37 from Line 36) .....

		-7			-7	25000.00
	Ţ	-	ī.	Ţ	-	0.00
_	-			-		25000.00
÷	÷	-	÷	÷	-	5297.00
÷	÷	7	÷	÷	7	
÷	÷	7	+	+	-7	0.00
L.		-7-			-7-	5297.00

Г	1				39469.38
_		-7		-7	00400.00
					0.00
_	1	-7	1	-	0.00
Г					39469.38
_		7		- 7	
Г					6093.55
_		-7		-7	
Г	1				0.00
-	-	-7		-7	0.00
					6093.55
_		 -7-		 -7-	

COLUMN B

Calendar Year-to-Date





## SCHEDULE A (FEC Form 3X)

Use separate schedule(s)

FOR LINE NUMBER:

(check only one)

PAGE 6 OF

48

• •	EMIZED RECEIPTS		for each category of the Detailed Summary Page	X 11a 11b 11c 12				12							
					13 14 15 16							17	,		
	y information copied from such Reports and Stat for commercial purposes, other than using the na													s	
	NAME OF COMMITTEE (In Full) COURAGEOUS CONSERVATIV	ES PAG	C												
A.	Full Name of Individual (Last, First, Middle Initial Lamon, James, , , Mailing Address 7300 N 70th St	) or Full O	organization Name	_		te of	Re	ceipt	D /	Y	Y	Ý	Y		
	City	State	Zip Code	08 31 2023 Transaction ID : SA11AI.6187											
	Paradise Valley	AZ	85253		Am	nount	of	Each F	Rece	pt this	s Pe	eriod			
	FEC ID number of contributing federal political committee.	С								-	25	5000.	00		
	Name of Employer (for Individual) Retired	Occi Reti	upation (for Individual) ired			Me	emo	Item							
		Aggregate	Year-to-Date ▼												
	Other (specify) ▼		25000.00												
B.	Full Name of Individual (Last, First, Middle Initial	) or Full O	organization Name		Da	te of	Re	ceipt							
	Mailing Address			M	M	/	D	D /	Y	Y	Y	Y			
	City	State	Zip Code		Am	nount	of	Each F	Rece	ipt this	s Pr	eriod			
	FEC ID number of contributing federal political committee.	С													
	Name of Employer (for Individual)	Occ	upation (for Individual)			Me	emo	Item							
	Receipt For: Primary General Other (specify) ▼	Aggregate	Year-to-Date ▼												
С.	Full Name of Individual (Last, First, Middle Initial	) or Full O	organization Name		Da	te of	Re	ceipt							
	Mailing Address				M	M	/	D	D /	Y	Y	Y	Y		
	City	State	Zip Code		Am	nount	of	Each F	Rece	ipt this	s Pi	eriod	_		
	FEC ID number of contributing federal political committee.	С		Amount of Each Receipt this Pe											
	Name of Employer (for Individual)	Occi	upation (for Individual)		Memo Item										
	Receipt For: Primary General Other (specify)	Aggregate	Year-to-Date ▼												
s	UBTOTAL of Receipts This Page (optional)							,		,	25	5000.	00		
т	OTAL This Period (last page this line number on				Г						25	5000.	00		

TOTAL This Period (last page this line number only)......

SCHEDULE B (FEC Form 3X)		arate schedule(s)											= 48			
TEMIZED DISBURSEMENTS		category of the		neck	only	one)	,	23	Г	26	<b></b>	27				
		Summary Page			210 28a	28	, ⊢	23 28c	-	20	-	27 30b				
Any information copied from such Reports and Stat				any	persc	on for th	e pu	irpose		solicitir		ntributio				
or for commercial purposes, other than using the na																
/ COURAGEOUS CONSERVATIV	ES PAC															
Full Name (Last, First, Middle Initial)						Date	of D	isburse	eme	ent						
Neighborhood Research and Media	l					M		/ D			Y Y	YY				
Mailing Address PO Box 297						09 19 2023										
City	State	Zip Code				FEC	lden	tificatio	n N	Numbe	r					
Rodanthe Purpose of Disbursement	NC	27968									-	- T				
Digital Management			<b></b>			С										
Candidate Name						-				) : SB2			مراجع			
			Cate Ty	egory /pe	/	Amol	int o	⊺ ⊢ach	Di	spurse	ment	this Pe	eriod			
	ement For:											137.35				
Senate	Primary	General														
State: District:	Other (spe	спу) 🔻				N	/lemo	b Item								
Full Name (Last, First, Middle Initial)																
PAC Management Services LLC							Date of Disbursement									
Mailing Address 441 N Lee St Ste 100	-								07 01 2023							
City	State	Zip Code				FEC	Iden	tificatio	n N	Numbe	r					
Alexandria Purpose of Disbursement	VA	22314				Transaction ID : SB21B.6191 Amount of Each Disbursement this Period										
Compliance Services																
Candidate Name			Cate		/											
Office Sought: House Disburs	ement For:		Ty	vpe	_							250.00				
Senate	Primary	General						-				1.45				
President	Other (spe	cify)					/lemo	o Item								
State: District:																
Full Name (Last, First, Middle Initial)						Date	of D	isburs	em	ent						
" PAC Management Services LLC						M	M	/ D			Y Y	YY				
Mailing Address 441 N Lee St Ste 100						30	}		31			)23				
City	State	Zip Code				FEC	Iden	tificatio	n N	Numbe	r					
Alexandria	VA	22314				100					-	-				
Purpose of Disbursement Compliance Services					۱ ۲	С										
Candidate Name			Cate	egory /pe	/	Transaction ID : SB21B.6183 Amount of Each Disbursement this Period										
Office Sought: House Disburs	ement For:		iy	he								450.00				
Senate	Primary	General						-		-						
President	Other (spe	cify) 🔻					/lem/	o Item								
State: District:																
State:       District:         SUBTOTAL of Disbursements This Page (optional)         TOTAL This Period (last page this line number onl)					_		-	-y		<b>F</b>	-	837.35	5			

SCHEDULE B (FEC Form 3X)	1.1					NUME	ER	:			PA	GE	8 O	F 48			
ITEMIZED DISBURSEMENTS		arate schedule(s) category of the		eck	only		2		200	Г	06		-				
		Summary Page			21b 28a		2 8b	$\vdash$	23 28c	┝	26 29	-	27 30b				
Any information copied from such Reports and State or for commercial purposes, other than using the nar				any j	oerso				pose		solicitir		ntributi				
NAME OF COMMITTEE (In Full)																	
angle COURAGEOUS CONSERVATIVE	ES PAC																
Full Name (Last, First, Middle Initial)						Date of Disbursement											
A. PAC Management Services LLC							e o	_	sourse			YY	Y	Ý			
Mailing Address 441 N Lee St Ste 100						10 05 2023											
5	State VA	Zip Code				FE	C Id	lenti	ficatio	on I	Numbe	r					
Alexandria Purpose of Disbursement	VA	22314				0	Ē			-			- T				
Compliance Services					11	С	Ļ						_				
Candidate Name			Cata		,	٨٣					): SB2		186 this P	oriod			
			Cateo Typ		′	AII	Jun	ιUΓ	Lach	שו	isbur se	ment					
Office Sought: House Disburse Senate	ment For: Primary	General					_		<b>y</b>		-		250.00				
State: District:	Other (spe	cify) 🔻					Me	emo	Item								
						_											
Full Name (Last, First, Middle Initial) <b>B.</b> Southern Pines Strategies						Da	e o	f Di	sburse	em	ent						
						Μ	M	/	D		/		- Y - Y	Y			
Mailing Address 1406 Cherokee Trl							07			12		20	023				
City Sanford	State NC	Zip Code 27332				FE	C Id	lenti	ficatio	on I	Numbe	r					
Purpose of Disbursement		27332			_	С											
List Acquisition						Transaction ID : SB21B.6180											
Candidate Name			Categ	gory	/	Amount of Each Disbursement t								eriod			
			Тур				-		-								
	ment For:						_		,			2	1000.00	)			
President	Primary Other (spe	General				-											
State: District:	Other (spec	city)				Ш	Me	emo	Item								
Full Name (Last, First, Middle Initial)						De		f Di	sburse	. m	ont						
<b>C</b> .						Da	.e 0			-			Y	<i>i</i>			
Mailing Address						M	= M	/	D		/	Y = Y	- Y - '	Ŷ			
City	State	Zip Code				FE	C Id	lenti	ficatio	on I	Numbe	r					
Purpose of Disbursement			_	-		С	Γ										
Candidate Name																	
			Cateo Typ		/	Amount of Each Disbursement this Period											
	ment For:	General	_	_			_	-	,								
President	Primary Other (spe	General															
State: District:	ound (she	∽y) ▼					Me	emo	Item								
							-		-			-		_			
SUBTOTAL of Disbursements This Page (optional).						L			7		y-		4250.0	0			
TOTAL This Period (last page this line number only	)												5087.3	5			



ITEMIZED INDEPENDENT EXPENDITURES					46 OF 48 E 24 OF FORM 3X
NAME OF COMMITTEE (In Full)					ATION NUMBER V
COURAGEOUS CONSERVATIVES	PAC				
				C C005870	22
Check if 24-hour report 48-hour report	New rep	oort Amends repo	ort filed on	M M / D D	/ Y Y Y Y
Full Name of Payee		Memo	Item Date	of Public Distributi	on/Dissemination
Neighborhood Research and Media			- I r	M M / D D	/ Y Y Y Y
Mailing Address DO Box 207			— L	08 17	2023
PO Box 297			Amou	unt	
City	State	Zip Code			7422.92
Rodanthe	NC	27968	Tran	saction ID : SE.610	7
Purpose of Expenditure				of Disbursement o	3
Radio Advertising		Category/ Type		08 / 16	/ Y Y Y Y Y 2023
Name of Federal Candidate:		Support	Office Soug	ht: House	District: 00
HALEY, NIKKI, , ,		X Oppose	X Presid	dent Senate	State: IA
Calendar Year-To-Date Per Election for Office Sought		7422.92	Disburseme	ent For: X Prim	ary General
Full Name of Davias	* *			of Public Distributi	
Full Name of Payee Neighborhood Research and Media		Memo			
Marthur Address				08 17	2023
Mailing Address PO Box 297			Amou	unt	
					7400.00
City	State	Zip Code		agentian ID - SE 61	7422.92
Rodanthe	NC	27968		of Disbursement o	
Purpose of Expenditure Radio Advertising		Category/ Type		08 / <sup>D</sup> 16	/ Y Y Y Y 2023
Name of Federal Candidate:		Support	Office Soug	ht: House	District. 00
SCOTT, TIMOTHY E., , ,		X Oppose	Rine eesig		State: <u>IA</u>
			Disburseme		
Calendar Year-To-Date Per Election for Office Sought		14845.84	2024	Other (specify) ► _	
(a) SUBTOTAL of Itemized Independent Expenditures	3		•		14845.84
(b) SUBTOTAL of Unitemized Independent Expenditu	res		•		
(c) TOTAL Independent Expenditures					
Under penalty of perjury I certify that the independent with, or at the request or suggestion of, any candid party committee) any political party committee or its	ate or authorized				
Dann Stalla			M = M /		Y Y Y
Denn, Stella, , , Signature		Date	9 01	04	2024
~				FEC Schedula E	(Form 3X) Rev. 05/2016
			Defs	s' Appx.	

ITEMIZED INDEPENDENT EXPENDITURES			PAGE	47 OF 48
NAME OF COMMITTEE (In Full)			FEC IDENTI	FICATION NUMBER V
COURAGEOUS CONSERVATIVES F	PAC		<b>C</b> C005	587022
Check if 24-hour report 48-hour report	New repo	ort Amends repo	t filed on	D / Y Y Y Y
Full Name of Payee		Memo	tem Date of Public Distr	ibution/Dissemination
Neighborhood Research and Media			08 / D2	29 / Y Y Y Y 2023
Mailing Address PO Box 297			Amount	
City	State	Zip Code		5994.95
Rodanthe	NC	27968	Transaction ID : SI Date of Disburseme	E.6168
Purpose of Expenditure Radio Advertising		Category/ Type		25 <sup>7</sup> 2023
Name of Federal Candidate:		Support	Office Sought: Ho	use District: 00
SCOTT, TIMOTHY E., , ,		X Oppose	President Ser	nate State: <u>IA</u>
Calendar Year-To-Date Per Election for Office Sought		20840.79	Disbursement For: X 2024 Other (specify)	Primary General
	, ,			
Full Name of Payee Neighborhood Research and Media		Memo	M M / D	ibution/Dissemination
Mailing Address			082	2023
PO Box 297			Amount	
City	State	Zip Code		5994.95
Rodanthe	NC	27968	Transaction ID : S	
Purpose of Expenditure Radio Advertising		Category/ Type	08 / D	25 / Y Y Y Y 2023
Name of Federal Candidate:		Support	Office Sought:	use District: 00
HALEY, NIKKI, , ,		X Oppose		nate State: IA
Calendar Year-To-Date Per Election for Office Sought	7 7	26835.74	Disbursement For: X 2024 Other (specify)	Primary General
(a) SUBTOTAL of Itemized Independent Expenditures			►	11989.90
(b) SUBTOTAL of Unitemized Independent Expenditur	es		Image: A state of the state	
(c) TOTAL Independent Expenditures			•	
Under penalty of perjury I certify that the independent with, or at the request or suggestion of, any candida party committee) any political party committee or its	te or authorized			
			M M / D D /	YYYYY
Denn, Stella, , , Signature		_ Date	01 04	2024
			Defs' App	le E (Form 3X) Rev. 05/2016 X. 14

ITEMIZED INDEPENDENT EXPENDITURES	6				AGE 48	OF 48 24 OF FORM 3X
NAME OF COMMITTEE (In Full)					-	ON NUMBER ▼
COURAGEOUS CONSERVATIVES	PAC				C00587022	
Check if 24-hour report 48-hour report	New rep	port Amends repo	ort filed on	M /	D D /	Y Y Y Y Y
Full Name of Payee		Memo	Item Date of	of Public	Distribution	/Dissemination
Neighborhood Research and Media			N	09 <sup>//</sup>	06 /	Y Y Y Y 2023
Mailing Address PO Box 297			Amou	nt		
City	State	Zip Code				11934.92
Rodanthe	NC	27968			: SE.6173 sement or 0	Obligation
Purpose of Expenditure Radio Advertising		Category/ Type		09 <sup>M</sup>	D D / 05	2023
Name of Federal Candidate:		Support	Office Sough	nt.	House	District: 00
HALEY, NIKKI, , ,		X Oppose	Preside		Senate	State: IA
Calendar Year-To-Date Per Election for Office Sought		38770.66	Disbursemen 2024	t For:	✓ Primary cify) ►	/ General
Full Name of Payee		Memo	Item Date of	of Public	Distribution	/Dissemination
Neighborhood Research and Media				09 /	D D /	Y Y Y Y 2023
Mailing Address PO Box 297			L			
			Amou	nt		
City	State	Zip Code				11934.92
Rodanthe	NC	27968			: SE.6174 sement or (	
Purpose of Expenditure Radio Advertising		Category/ Type		09 /	05 /	Y Y Y Y 2023
Name of Federal Candidate:					1	Diatriat: 00
SCOTT, TIMOTHY E., , ,		Support	Office Sough		House Senate	District:00 State:IA
Calendar Year-To-Date Per Election for Office Sought		50705.58	Disbursemen 2024	t For:	<b>X</b> Primary	/ General
	1 1			ther (spe	cify) ►	
(a) SUBTOTAL of Itemized Independent Expenditure	S					23869.84
(b) SUBTOTAL of Unitemized Independent Expendit	ures		•			
(c) TOTAL Independent Expenditures					7	50705.58
Under penalty of perjury I certify that the independ with, or at the request or suggestion of, any candic party committee) any political party committee or its	date or authorized					
Denn, Stella, , ,			M = M /	DDD		Y Y
Signature		Date	e 01	04	202	24
			Defs		•	orm 3X) Rev. 05/2016

/2024 09 : 07

Image# 202404019627435528				<b>04/01/2024 09 : 0</b> 7 PAGE 1 / 42
FEC A	REPORT OF R AND DISBURS or Other Than An Author	SEMENTS	Office	Jse Only
1. NAME OF T COMMITTEE (in full)	TYPE OR PRINT ▼	Example: If typing, typ over the lines.	be 12FE4M5	
	ERVATIVES PAC			<u> </u>
ADDRESS (number and street)	5 Halifax Ct			
Check if different than previously reported. (ACC)	Mariton		NJ 0809	53 
2. FEC IDENTIFICATION NUI		▲	STATE 🔺	ZIP CODE ▲
C C00587022	3. IS T REF	PORT X NEW (N)	OR AMENDED (A)	)
<ul> <li>4. TYPE OF REPORT (Choose One)</li> <li>(a) Quarterly Reports:</li> <li>April 15 Quarterly Report (Q1</li> <li>July 15 Quarterly Report (Q2</li> <li>October 15 Quarterly Report (Q3</li> <li>January 31 Year-End Report (YE</li> </ul>	(C) 12-Day PRE-Election Report for the:	0 (M3)       Jun 20         0 (M4)       Jul 20         Primary (12P)         Convention (12C)	(M6) Sep 20 (M9) (M7) Oct 20 (M10) General (12G) Special (12S)	(Non-Election Year Only) Dec 20 (M12) (Non-Election Year Only)
July 31 Mid-Year Report (Non-election Year Only) (MY) Termination Report (TER)	(d) 30-Day	General (30G)	Runoff (30R)	Special (30S) in the State of
5. Covering Period 01		through		
I certify that I have examined this Type or Print Name of Treasurer	B Report and to the best of m Denn, Stella, , ,	y knowledge and belief	it is true, correct and compl	ete.
Signature of Treasurer	Stella, , ,		Date 04 / C	1 / Y Y Y Y 2024

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 52 U.S.C. § 30109.

I	Office Use Onlv					FEC FORM 3X Rev. 05/2016	
	Only			[	Defs'	Appx. 16	

#### SUMMARY PAGE OF RECEIPTS AND DISBURSEMENTS

Page 2

Write or Type Committee Name

FEC Form 3X (Rev. 05/2016)

_	COURAGEOUS CONSERVATIVE	ES PAC	
F	Report Covering the Period: From:	01 / 01 / 2024 To:	M m         /         D = D         /         Y = Y = Y = Y         Y           03         31         2024         2024
		COLUMN A This Period	COLUMN B Calendar Year-to-Date
6.	(a) Cash on Hand January 1, 2024	[	7251.26
	(b) Cash on Hand at Beginning of Reporting Period	7251.26	
	(c) Total Receipts (from Line 19)	0.00	0.00
	<ul><li>(d) Subtotal (add Lines 6(b) and</li><li>6(c) for Column A and Lines</li><li>6(a) and 6(c) for Column B)</li></ul>	7251.26	7251.26
7.	Total Disbursements (from Line 31)	0.00	0.00
8.	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	7251.26	7251.26
9.	Debts and Obligations Owed <b>TO</b> the Committee (Itemize all on Schedule C and/or Schedule D)	0.00	
10	. Debts and Obligations Owed <b>BY</b> the Committee (Itemize all on Schedule C and/or Schedule D)	324251.32	

This committee has qualified as a multicandidate committee. (see FEC FORM 1M)

For further information, contact the Federal Election Commission at 800-424-9530 or visit www.fec.gov

Imaga #	2024040	10627/17	25520
IIIIaue#	2024040	1302/4.	0000

of Receipts

FEC Form 3X (Rev. 05/2016)

Write or Type Committee Name

## COURAGEOUS CONSERVATIVES PAC

R	eport Covering the Period: From:		: 03 / D D / Y Y Y Y 31 2024
	I. Receipts	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
11.	Contributions (other than loans) From:	'	
	(a) Individuals/Persons Other		
	Than Political Committees	0.00	0.00
	(i) Itemized (use Schedule A)		0.00
	(ii) Unitemized	0.00	0.00
	(iii) TOTAL (add		
	Lines 11(a)(i) and (ii)	0.00	0.00
	(b) Political Party Committees	0.00	0.00
	(c) Other Political Committees		
	(such as PACs)	0.00	0.00
	(d) Total Contributions (add Lines		
	11(a)(iii), (b), and (c)) (Carry		0.00
	Totals to Line 33, page 5)▶	0.00	0.00
12.	Transfers From Affiliated/Other		0.00
	Party Committees	0.00	0.00
		0.00	0.00
13.	All Loans Received		
		0.00	0.00
	Loan Repayments Received	0.00	0.00
15.	Offsets To Operating Expenditures		
	(Refunds, Rebates, etc.)	0.00	0.00
16	(Carry Totals to Line 37, page 5) Refunds of Contributions Made		
10.	to Federal Candidates and Other		
	Political Committees	0.00	0.00
17.	Other Federal Receipts		
	(Dividends, Interest, etc.)	0.00	0.00
18.	Transfers from Non-Federal and Levin Funds		43. 43. 43.
	(a) Non-Federal Account		
	(from Schedule H3)	0.00	0.00
	(b) Levin Funds (from Schedule H5)	0.00	0.00
	(c) Total Transfers (add 18(a) and 18(b))	0.00	0.00
19.	Total Receipts (add Lines 11(d),		
	12, 13, 14, 15, 16, 17, and 18(c))	0.00	0.00
			474 474 1
20.	Total Federal Receipts		
	(subtract Line 18(c) from Line 19)►	0.00	0.00
		, , , , , , , , , , , , , , , , , , , ,	

Page 3

of Disbursements

FEC Form 3X (Rev. 05/2016) Page 4 COLUMN A COLUMN B **II. Disbursements Total This Period Calendar Year-to-Date** 21. Operating Expenditures: Allocated Federal/Non-Federal (a) Activity (from Schedule H4) 0.00 0.00 Federal Share ..... (i) 0.00 0.00 (ii) Non-Federal Share..... (b) Other Federal Operating 0.00 0.00 Expenditures ..... (c) Total Operating Expenditures 0.00 (add 21(a)(i), (a)(ii), and (b)) 0.00 22. Transfers to Affiliated/Other Party Committees..... 0.00 0.00 23 Contributions to Federal Candidates/Committees 0.00 0.00 and Other Political Committees... 24. Independent Expenditures (use Schedule E).... Coordinated Party Expenditures (52 U.S.C. § 30116(d)) (use Schedule F).... 0.00 0.00 25. 0.00 0.00 26. Loan Repayments Made..... 0.00 0.00 19 Loans Made..... Refunds of Contributions To: 0.00 27. 28. 0.00 Individuals/Persons Other (a) Than Political Committees 0.00 0.00 (b) Political Party Committees ..... 0.00 0.00 Other Political Committees (C) (such as PACs)..... 0.00 0.00 Total Contribution Refunds (d) (add Lines 28(a), (b), and (c))...... 0.00 0.00 29. Other Disbursements (Including 0.00 Non-Federal Donations)..... 0.00 30. Federal Election Activity (52 U.S.C. § 30101(20)) (a) Allocated Federal Election Activity (from Schedule H6) (i) Federal Share .... 0.00 0.00 (ii) "Levin" Share..... 0.00 0.00 (b) Federal Election Activity Paid Entirely With Federal Funds ..... 0.00 0.00 Total Federal Election Activity (add (C) Lines 30(a)(i), 30(a)(ii) and 30(b)) ..... 0.00 0.00 31. Total Disbursements (add Lines 21(c), 22, 23, 24, 25, 26, 27, 28(d), 29 and 30(c)).. 0.00 0.00 32. Total Federal Disbursements (subtract Line 21(a)(ii) and Line 30(a)(ii) from Line 31)..... 0.00 0.00

of Disbursements

III. Net Contributions/ Operating Expenditures	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
<ul> <li>Total Contributions (other than loans) (from Line 11(d), page 3)</li> </ul>	0.00	0.00
. Total Contribution Refunds (from Line 28(d))	0.00	0.00
. Net Contributions (other than loans) (subtract Line 34 from Line 33)	0.00	0.00
. Total Federal Operating Expenditures (add Line 21(a)(i) and Line 21(b))►	0.00	0.00
. Offsets to Operating Expenditures (from Line 15, page 3)	0.00	0.00
. Net Operating Expenditures (subtract Line 37 from Line 36)	0.00	0.00

Defs' Appx. 20

Image#	202407	02965	2557059
--------	--------	-------	---------

FEC FORM 3X

07/02/2024 14 : 49

PAGE 1 / 56

# **REPORT OF RECEIPTS** AND DISBURSEMENTS For Other Than An Authorized Committee

							Office	Use Only	
1.	NAME ( COMMI	DF TTEE (in full)	TYPE OR PRINT	EAG	mple: If typing, r the lines.	type 1	2FE4M5		
C	OURA								
ADI	DRESS (r	number and street)	5 Halifax Ct						
		eck if different n previously	Marlton			<u> </u>	NJ 1 080		
		orted. (ACC)							
2.	FEC ID	ENTIFICATION N	UMBER 🔻	CITY A		STA	ATE 🔺	ZIP COI	DE ▲
	C	C00587022		3. IS THIS REPORT	× NEV (N)	OR	AMENDE (A)	C	
4.	<b>TYPE</b> (Choose	OF REPORT One)	(b) Monthly Report	Feb 20 (M2)	Мау	20 (M5)	Aug 20 (M8	)	Nov 20 (M11) (Non-Election Year Only)
	(a) Qua	arterly Reports:	Due On:	Mar 20 (M3)	Jun	20 (M6)	Sep 20 (M9	)	Dec 20 (M12) (Non-Election Year Only)
		April 15		Apr 20 (M4)	Jul	20 (M7)	Oct 20 (M10	))	Jan 31 (YE)
	×	Quarterly Report (	(C) 12-Da	y Election	Primary (12P)		General (12G)		Runoff (12R)
	п	Quarterly Report ( October 15	Repor	t for the:	Convention (120	;)	Special (12S)		
		Quarterly Report ( January 31 Year-End Report ()		Election on	M M / D	D / Y	Y Y Y	in the State of	f
		July 31 Mid-Year Report (Non-electio Year Only) (MY)	POST	y -Election t for the:	General (30G)		Runoff (30R)		Special (30S)
		Termination Report (TER)		Election on	M M / D	D / Y	Y Y Y	in the State of	f
5.	Covering	g Period 0		2024	through	M M /		2024	
l ce	ertify that	I have examined th		he best of my know	wledge and belie	ef it is true,	correct and comp	lete.	
Тур	e or Prin	t Name of Treasure	Denn, Stella, , , er						
Sig	nature of	Treasurer Den	n, Stella, , ,			Date		)2	2024 Y
NO		ission of false, error	neous, or incomplete	information may su	bject the person	signing this	Report to the pena	Ities of 52	U.S.C. § 30109
L	U	fice se nly					FE	C FOR Rev. 05/20	
						D	efs' Ap	рх. 2	21

#### SUMMARY PAGE OF RECEIPTS AND DISBURSEMENTS

Page **2** 

Write or Type Committee Name

FEC Form 3X (Rev. 05/2016)

-	COURAGEOUS CONSERVATIVES	S PAC	
F	Report Covering the Period: From: 04	1 1 0 0 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	: 06 / D D / Y Y Y Y 06 30 / 2024
		COLUMN A This Period	COLUMN B Calendar Year-to-Date
6.	(a) Cash on Hand January 1, 2024		7251.26
	(b) Cash on Hand at Beginning of Reporting Period	7251.26	
	(c) Total Receipts (from Line 19)	175597.15	175597.15
	<ul> <li>(d) Subtotal (add Lines 6(b) and</li> <li>6(c) for Column A and Lines</li> <li>6(a) and 6(c) for Column B)</li> </ul>	182848.41	182848.41
7.	Total Disbursements (from Line 31)	165014.08	165014.08
8.	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	17834.33	17834.33
9.	Debts and Obligations Owed <b>TO</b> the Committee (Itemize all on Schedule C and/or Schedule D)	0.00	
10	Debts and Obligations Owed <b>BY</b> the Committee (Itemize all on Schedule C and/or Schedule D)	324251.32	

This committee has qualified as a multicandidate committee. (see FEC FORM 1M)

For further information, contact the Federal Election Commission at 800-424-9530 or visit www.fec.gov

Image#	202407	029652	2557061
--------	--------	--------	---------

of Receipts

FEC Form 3X (Rev. 05/2016)

Write or Type Committee Name

## COURAGEOUS CONSERVATIVES PAC

Report Covering the Period: From:	/ D D / Y Y Y Y 01 2024	M         M         /         D         D         /         Y
I. Receipts	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
. Contributions (other than loans) From:		
(a) Individuals/Persons Other		
Than Political Committees		
(i) Itemized (use Schedule A)	10597.15	10597.15
(ii) Unitemized	0.00	0.00
(iii) TOTAL (add		
Lines 11(a)(i) and (ii)	10597.15	10597.15
(b) Political Party Committees	0.00	0.00
(c) Other Political Committees	105000.00	
(such as PACs)	165000.00	165000.00
(d) Total Contributions (add Lines		
11(a)(iii), (b), and (c)) (Carry		175507.45
Totals to Line 33, page 5)▶	175597.15	175597.15
. Transfers From Affiliated/Other		
Party Committees	0.00	0.00
	0.00	0.00
All Loans Received		
. Loan Repayments Received	0.00	0.00
6. Offsets To Operating Expenditures		
(Refunds, Rebates, etc.)		
(Carry Totals to Line 37, page 5)	0.00	0.00
. Refunds of Contributions Made		
to Federal Candidates and Other		
Political Committees	0.00	0.00
7. Other Federal Receipts		0.00
(Dividends, Interest, etc.)	0.00	0.00
(a) Non-Federal Account (from Schedule H3)	0.00	0.00
	0.00	0.00
(b) Levin Funds (from Schedule H5)	0.00	
(c) Total Transfers (add 18(a) and 18(b))	0.00	0.00
		0.00
9. Total Receipts (add Lines 11(d),		
12, 13, 14, 15, 16, 17, and 18(c))	175597.15	175597.15
. Total Federal Receipts		
(subtract Line 18(c) from Line 19)▶	175597.15	175597.15

Defs' Appx. 23

Page 3

of Disbursements

FEC Form 3X (Rev. 05/2016) Page 4 COLUMN A COLUMN B **II. Disbursements Total This Period Calendar Year-to-Date** 21. Operating Expenditures: Allocated Federal/Non-Federal (a) Activity (from Schedule H4) 0.00 0.00 Federal Share ..... (i) 0.00 0.00 (ii) Non-Federal Share..... (b) Other Federal Operating 2420.00 2420.00 Expenditures ..... (c) Total Operating Expenditures 2420.00 (add 21(a)(i), (a)(ii), and (b)) 2420.00 22. Transfers to Affiliated/Other Party Committees..... 0.00 0.00 23 Contributions to Federal Candidates/Committees 10000.00 10000.00 and Other Political Committees... 24. Independent Expenditures (use Schedule E).... Coordinated Party Expenditures (52 U.S.C. § 30116(d)) (use Schedule F).... 152594.08 152594.08 25. 0.00 0.00 26. Loan Repayments Made..... 0.00 0.00 Loans Made.... Refunds of Contributions To: (a) Individuals/Persons Other 0.00 27. 28. 0.00 Than Political Committees 0.00 0.00 (b) Political Party Committees ..... 0.00 0.00 Other Political Committees (C) (such as PACs)..... 0.00 0.00 Total Contribution Refunds (d) (add Lines 28(a), (b), and (c))...... 0.00 0.00 29. Other Disbursements (Including 0.00 Non-Federal Donations)..... 0.00 30. Federal Election Activity (52 U.S.C. § 30101(20)) (a) Allocated Federal Election Activity (from Schedule H6) (i) Federal Share .... 0.00 0.00 (ii) "Levin" Share..... 0.00 0.00 (b) Federal Election Activity Paid Entirely With Federal Funds ..... 0.00 0.00 Total Federal Election Activity (add (C) Lines 30(a)(i), 30(a)(ii) and 30(b)) ..... 0.00 0.00 31. Total Disbursements (add Lines 21(c), 22, 23, 24, 25, 26, 27, 28(d), 29 and 30(c)).. 165014.08 165014.08 32. Total Federal Disbursements (subtract Line 21(a)(ii) and Line 30(a)(ii) from Line 31)..... 165014.08 165014.08

of Disbursements

III. Net Contributions/ Operating Expenditures	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
<ol> <li>Total Contributions (other than loans) (from Line 11(d), page 3)</li> </ol>	175597.15	175597.15
<ol> <li>Total Contribution Refunds (from Line 28(d))</li> </ol>	0.00	0.00
35. Net Contributions (other than loans) (subtract Line 34 from Line 33)	175597.15	175597.15
6. Total Federal Operating Expenditures (add Line 21(a)(i) and Line 21(b))►	2420.00	2420.00
7. Offsets to Operating Expenditures (from Line 15, page 3)	0.00	0.00
8. Net Operating Expenditures (subtract Line 37 from Line 36)	2420.00	2420.00

## SCHEDULE A (FEC Form 3X) ITEMIZED DECEIDTS

Use separate schedule(s)

FOR LINE NUMBER:

(check only one)

PAGE 6 OF

56

	EMIZED RECEIPTS			or each category of the Detailed Summary Page		_	11a 13		] 11   14	·	11		$\square$	12 16	<b>1</b> 1	7
	y information copied from such Reports and State for commercial purposes, other than using the na					fo	r the		pos	se of	solic	iting	con	ntribu	tions	
	NAME OF COMMITTEE (In Full) COURAGEOUS CONSERVATIV	ES PAC	)													
	Full Name of Individual (Last, First, Middle Initial)         Ekstrom, Christopher, , ,         Mailing Address 25 Highland Park Village         Suite 100         City         Dallas         FEC ID number of contributing         federal political committee.         Name of Employer (for Individual)         Self-employed         Receipt For:         Primary         General         Other (specify) ▼	State TX C Occu Inves	ipat	Zip Code 75205 tion (for Individual)		[	ate of 06 Trans mount	/ acti	ion Ea	14 1 <b>D</b> :	SA1		20 5 <b>258</b>			]
В.	Full Name of Individual (Last, First, Middle Initial) Green, Margaret, , , Mailing Address 787 W Shannon Rd City						Date of Receipt									
	Bridgeport FEC ID number of contributing federal political committee. Name of Employer (for Individual) Retired	State Zip Code WV 26330						Transaction ID : SA11AI.6239         Amount of Each Receipt this Period         10000.00         Memo Item							]	
	Receipt For: Primary General Other (specify) ▼	Aggregate `	pregate Year-to-Date ▼ 10000.00													
C.	Full Name of Individual (Last, First, Middle Initial) Mailing Address	) or Full Or	rgar	nization Name			ate of	Re	_	ipt	) /	Y	Y	Ŷ	Ŷ	
	City FEC ID number of contributing	State	_	Zip Code		Ar	mount	: of	Ea	ch R	leceip	ot thi	s P	eriod		_
	In Lo ib number of contributing       federal political committee.       Name of Employer (for Individual)	Occu	ıpat	ion (for Individual)			М	emc	۳ D Ite	em		9				1
	Receipt For: Primary General Other (specify)	Aggregate `	Yea	ar-to-Date ▼												
s	UBTOTAL of Receipts This Page (optional)			•	• •				7			9	10	)597.	15	]
т	OTAL This Period (last page this line number onl	y)		•	-				-,-			,	10	)597.	15	



## SCHEDULE A (FEC Form 3X) ITEMIZED RECEIPTS

Use separate schedule(s) for each category of the Detailed Summary Page FOR LINE NUMBER:

(check only one)

PAGE 7 OF

56

				etailed Summa			11a	۱ 	_	11b 14	×	11c	$\square$	12 16	<b>1</b> 1	7	
Ar or	y information copied from such Reports and State for commercial purposes, other than using the na	ements ma ame and a	ay not	t be sold or us s of any polition	ed by any pe al committee	ersor e to s	n for th	ne p cont	ourp	ose o	of s fro	oliciting	cor cor	ntribut	ons		
$\setminus$	NAME OF COMMITTEE (In Full)																
$\sum$	COURAGEOUS CONSERVATIV	ES PAG	C														
A.	Full Name of Individual (Last, First, Middle Initial) NEVER BACK DOWN INC.	or Full O	Drganiz	zation Name			Date	of	Red	ceipt							
	Mailing Address P.O. BOX 341027	1					M 0		/	D 03		/ Y	Y 20	)24	Y		
	City AUSTIN	State TX	Z	Zip Code 78734						-	-	A11C.6					
				10134	_	_	Amo	unt	of I	Each	Re	ceipt th	is P	eriod		1	
	FEC ID number of contributing federal political committee.	C co	083407	77			Ŀ	_		7	_	-	165	5000.0	0	I,	
	Name of Employer (for Individual)	Occ	upatior	n (for Individua	al)			Mei	mo	Item							
		Year-t	to-Date 🔻														
	Primary     General       Other (specify) ▼	16	5000.00														
в.	Full Name of Individual (Last, First, Middle Initial)	Organiz	zation Name			Date	of	Red	ceipt								
	Mailing Address						M = M / D = D / Y = Y = Y = Y										
	City	State	Z	Zip Code		_	Amount of Each Receipt this Period										
	FEC ID number of contributing federal political committee.	С					П									1	
	Name of Employer (for Individual)	Occ	upatio	on (for Individu	al)	_	Memo Item										
	Receipt For:																
	Primary General	Aggregate	Year-t	to-Date ▼	1												
	Other (specify) V		,	,													
с.	Full Name of Individual (Last, First, Middle Initial)	or Full O	rganiz	zation Name			Date	of	Red	ceipt							
	Mailing Address						М	М	/	D	D	/ Y	Y	Y	Y		
	City	State	Z	Zip Code		_	Amo	unt	of I	Each	Re	ceipt th	is P	eriod			
	FEC ID number of contributing federal political committee.	С					Amount of Each Receipt this Period									]	
	Name of Employer (for Individual)	Occi	upatior	n (for Individua	al)		Ц	Me	mo	Item							
		Aggregate	Year-t	to-Date 🔻													
	Other (specify)		-														
s	UBTOTAL of Receipts This Page (optional)				•••••	<u> </u>				,		9	165	5000.0	0	Ī	
т	OTAL This Period (last page this line number only	y)			•••••	•				,		-	165	5000.0	0	1	



S	SCHEDULE B (FEC Form 3X)			F	FOR LINE NUMBER: PAGE 8 OF 56									
IT	EMIZED DISBURSEMENTS		arate schedule(s) category of the		heck	only	( one)							
			Summary Page		X		22		23		26		27	
						28a	28b 28c 29 30b							
	y information copied from such Reports and State for commercial purposes, other than using the na													
$\backslash$	NAME OF COMMITTEE (In Full)													
	COURAGEOUS CONSERVATIVE	ES PAC												
	Full Name (Last, First, Middle Initial)													
Α.	Bright for SC Senate						Date of Disbursement							
	Mailing Address 775 Spartan Blvd Ste 106B						05		2	29		20	)24	
	City	State SC	Zip Code				FEC I	denti	ficatio	n Nu	Imber			
	Spartanburg Purpose of Disbursement	30	29301					1					-	
	Nonfederal Contribution					11	С						_	
	Candidate Name				_	- 1			action		-			
	Candidate Name				egory ype	/	Amou	nt of	Each	Dist	oursen	nent	this I	Period
	Office Sought: House Disburse	ment For:			71		1000.00							0
	Senate	Primary	General						7		-7-	-		
	State: District:	Other (spec	cify) 🔻				М	Memo Item						
	Full Name (Last, First, Middle Initial)		_											
В.	Bright for SC Senate						Date of		sburse	emer	ıt			
	Mailing Address 775 Spartan Blvd Ste 106B						06 / 14 / 2024				Y			
	City	State	Zip Code				FEC I	denti	ficatio	n Nu	Imber			
	Spartanburg Purpose of Disbursement	SC	29301										-	
	Nonfederal Contribution						С						_	
	Candidate Name							Transaction ID : SB21B.6257						
					egory		Amount of Each Disbursement this Period						Period	
	Office Sought: House Disburse	ment For:	Type nent For: Primary General Other (specify)				1000.00							
	Senate	1												
	President													
	State: District:	]					Memo Item							
	Full Name (Last, First, Middle Initial)													
C.	PAC Management Services LLC						Date of		sburse		it	Y	Y	Y
	Mailing Address 441 N Lee St Ste 100						06		0	)5		20	)24	
	City	State	Zip Code				FEC I	denti	ficatio	n Nu	Imber			
	Alexandria	VA	22314									-	-	
	Purpose of Disbursement					п I.	C						.	
	Compliance Services Candidate Name			0.1			Tı Amoui		action					Dariad
					egory ype	′	Anoul		Laun	DISL		nent	115	enou
	Office Sought: House Disbursement For:												250.0	
	Senate     Primary     General       President     Other (specify)     ▼								,		7			
							М	emo	Item					
_	State: District:													
													2250.	00
L <sup>s</sup>	<b>UBTOTAL</b> of Disbursements This Page (optional).								-		7		2200.	
т	OTAL This Period (last page this line number only	/)											2250.	00
I .		,						-	1		,	1.0	1.1	



SCHEDULE B (FEC Form 3X)			FOR LINE I	NUMBER: PAGE 9 OF 56					
ITEMIZED DISBURSEMENTS	for each	arate schedule(s) category of the Summary Page	(check only 21b 28a	one) 22 X 23 26 27 28b 28c 29 30b					
Any information copied from such Reports and State or for commercial purposes, other than using the na									
	ES PAC								
Full Name (Last, First, Middle Initial) A. DEFEATING COMMUNISM PAC				Date of Disbursement					
Mailing Address 555 METRO PLACE S STE. 525									
City DUBLIN	State OH	Zip Code 43017							
Purpose of Disbursement		[		C C00728386 Transaction ID : SB23.6246					
Candidate Name			Category/ Type	Amount of Each Disbursement this Period					
Office Sought: House Disburse Senate President	ment For: Primary Other (spec	General cify) ▼		10000.00					
State: District:		Memo Item							
Full Name (Last, First, Middle Initial) B.				Date of Disbursement					
Mailing Address									
City	State	Zip Code		FEC Identification Number					
Purpose of Disbursement		1		C					
Candidate Name			Category/ Type	Amount of Each Disbursement this Period					
Senate	ment For: Primary	General							
State: District:	Other (spec	cify)		Memo Item					
Full Name (Last, First, Middle Initial)				Date of Disbursement					
Mailing Address									
City	State	Zip Code		FEC Identification Number					
Purpose of Disbursement		[		C					
Candidate Name Office Sought: House Disburse	mont For		Category/ Type	Amount of Each Disbursement this Period					
Office Sought: House Disburse Senate President	ment For: Primary Other (spec	General		Memo Item					
State: District:		- ,, +							
SUBTOTAL of Disbursements This Page (optional).			····· ►	10000.00					
TOTAL This Period (last page this line number only	/)		••••••	10000.00					



ITEMIZED INDEPENDENT EXPENDITURES				PAGE 47 OF 56
NAME OF COMMITTEE (In Full)				FOR LINE 24 OF FORM 3X
COURAGEOUS CONSERVATIVES I	PAC			C IDENTIFICATION NUMBER ▼
			C	C00587022
Check if 24-hour report 48-hour report	New rep	ort Amends repo	ort filed on	
Full Name of Payee		Memo	Item Date of P	Public Distribution/Dissemination
Bright Images			M 06	
Mailing Address 3022 Memorial Ave				
			Amount	
City	State	Zip Code		597.15
Lynchburg	VA	24501		tion ID : SE.6236
Purpose of Expenditure		Category/		Disbursement or Obligation
Voter Guide		Туре	06	
Name of Federal Candidate:		Support	Office Sought:	K House District: 05
GOOD, ROBERT G. HON., , ,		Oppose	President	
Calendar Year-To-Date			Disbursement Fo	or: X Primary General
Per Election for Office Sought		152594.08	2024	er (specify)
Full Name of Payee		Memo		Public Distribution/Dissemination
Go Right Strategies			M	M / D D / Y Y Y Y
Mailing Address			06	10 2024
500 Westover Dr #7975			Amount	
City	State	Zip Code		20000.00
Sanford	NC	27330		tion ID : SE.6194 Disbursement or Obligation
Purpose of Expenditure	-	Category/	M	M / D D / Y Y Y
Digital Advertising		Туре	06	06 2024
Name of Federal Candidate:		X Support	Office Sought:	House District: 05
GOOD, ROBERT G. HON., , ,		Oppose	President	Senate State: VA
Calendar Year-To-Date		20000.00	Disbursement Fe	or: 🗙 Primary 🗌 General
Per Election for Office Sought	7 7	20000.00	2024 🗌 Othe	er (specify) ►
(a) SUBTOTAL of Itemized Independent Expenditures	;			20597.15
				,,
(b) SUBTOTAL of Unitemized Independent Expenditu	res			7
(c) TOTAL Independent Expenditures			•	
Under penalty of perjury I certify that the independe with, or at the request or suggestion of, any candida party committee) any political party committee or its	ate or authorized			
party committee, any pointer party committee of its	~90III.			
Denn, Stella, , ,		5		02 / Y Y Y Y 2024
Signature		_ Date	e 07 0	
			FI	EC Schedule E (Form 3X) Rev. 05/2016
			Defs'	Appx. 30

ITEMIZED INDEPENDENT EXPENDITURES				PAGE 48 OF 56 FOR LINE 24 OF FORM 3X
NAME OF COMMITTEE (In Full)			FF	C IDENTIFICATION NUMBER ▼
COURAGEOUS CONSERVATIVES I	PAC			
			C	C00587022
Check if 24-hour report 48-hour report	New rep	ort Amends repo	ort filed on	
Full Name of Payee		Memo	Item Date of Pu	ublic Distribution/Dissemination
Go Right Strategies			M	
Mailing Address 500 Westover Dr #7975			06	10 2024
5 500 Westover DI #7975			Amount	
City	State	Zip Code		20000.00
Sanford	NC	27330	Transactio	on ID : SE.6196
Purpose of Expenditure				sbursement or Obligation
Digital Advertising		Category/ Type	06	/ D D / Y Y Y Y 06 / 2024
Name of Federal Candidate:		Support	Office Sought:	House District:05
MCGUIRE, JOHN, , ,		X Oppose	President	Senate State: VA
Calendar Year-To-Date Per Election for Office Sought		40000.00	Disbursement Fo	
	, , , , , , , , , , , , , , , , , , , ,			(specify) ►
Full Name of Payee Go Right Strategies		Memo		
Mailing Address			06	10 2024
Mailing Address 500 Westover Dr #7975			Amount	
21				00000.00
City Sanford	State	Zip Code	Transacti	20000.00
	NC	27330		sbursement or Obligation
Purpose of Expenditure TV Advertising		Category/ Type	06	/ D D / Y Y Y Y 06 / 2024
Name of Federal Candidate:		Support	Office Sought:	House District:05
GOOD, ROBERT G. HON., , ,		Oppose	President	Senate State: VA
Calendar Year-To-Date			Disbursement Fo	
Per Election for Office Sought		60000.00	2024	(specify) ►
				(======================================
(a) SUBTOTAL of Itemized Independent Expenditures	;			40000.00
				(j)
(b) SUBTOTAL of Unitemized Independent Expenditu	res			
(c) TOTAL Independent Expenditures			•	· · · · · · · · ·
Under penalty of perjury I certify that the independe with, or at the request or suggestion of, any candida party committee) any political party committee or its	ate or authorized			
David Skalla				
Denn, Stella, , , Signature		Date	9 07 0	2 2024
, , , , , , , , , , , , , , , , , , ,				C Schedule E (Form 3X) Rev. 05/2010
				Appx. 31

ITEMIZED INDEPENDENT EXPENDITURES				PAGE	49 OF 56
NAME OF COMMITTEE (In Full)					
COURAGEOUS CONSERVATIVES	PAC				
	-			C C0058	37022
Check if 24-hour report 48-hour report	New rep	ort Amends repo	ort filed on	/ M / D I	D / Y Y Y Y
Full Name of Payee		Memo	Item Date	of Public Distrib	bution/Dissemination
Go Right Strategies			- I r	M M / D	
Mailing Address 500 Westover Dr #7975			- L	06 10	2024
			Amou	unt	
City	State	Zip Code			20000.00
Sanford	NC	27330		saction ID : SE.	
Purpose of Expenditure		Cotogony		of Disbursemer	5
TV Advertising		Category/ Type		06 06	
Name of Federal Candidate:		Support	Office Soug	ht: 🗙 Hous	se District: 05
MCGUIRE, JOHN, , ,		X Oppose	Presic		1/4
Calendar Year-To-Date			Disburseme	nt For: X P	Primary General
Per Election for Office Sought	7	80000.00	2024	Other (specify)	
Full Name of Payee		Memo			bution/Dissemination
Go Right Strategies			_	M M / D	
Mailing Address			L	06 10	2024
500 Westover Dr #7975			Amou	unt	
City	State	Zip Code			20668.20
Sanford	NC	27330		saction ID : SE of Disbursemer	
Purpose of Expenditure		Category/		M M / D	D / Y Y Y Y
Radio Advertising		Туре	-   L	06 06	6 2024
Name of Federal Candidate:		X Support	Office Soug	ht: 🗙 Hous	se District: 05
GOOD, ROBERT G. HON., , ,		Oppose	Presic	lent Sena	ate State: VA
Calendar Year-To-Date Per Election for Office Sought		100668.20	Disburseme 2024	nt For: 🗙 P	rimary General
				Other (specify)	▶
			_		
(a) SUBTOTAL of Itemized Independent Expenditures			• •		40668.20
(b) SUBTOTAL of Unitemized Independent Expenditur	res		• •		7
(c) TOTAL Independent Expenditures			• •		
Under penalty of perjury I certify that the independe with, or at the request or suggestion of, any candida party committee) any political party committee or its	ate or authorized				
Denn, Stella, , ,		Date	e 07	02 / Y	2024
Signature					
			Defs	FEC Schedule	E (Form 3X) Rev. 05/201 X. 32

ITEMIZED INDEPENDENT EXPENDITURES					AGE 50	OF 56 4 OF FORM 3X
NAME OF COMMITTEE (In Full)					-	
COURAGEOUS CONSERVATIVES	PAC				C00587022	
				C	500587022	
Check if 24-hour report 48-hour report	New rep	ort Amends repo	ort filed on	M M /	D D /	Y Y Y Y Y
Full Name of Payee		Memo	Item Date	of Public	Distribution/I	Dissemination
Go Right Strategies				M M /	D D /	Y Y Y Y
Mailing Address 500 Westover Dr #7975			_	06	10	2024
			Amo	unt		
City	State	Zip Code				20668.21
Sanford	NC	27330		saction ID		
Purpose of Expenditure		Cotogony	Date	e of Disburs	ement or O	bligation
Radio Advertising		Category/ Type		06	06	2024
Name of Federal Candidate:		Support	Office Sou	ght: 🗙	House	District:05
MCGUIRE, JOHN, , ,		X Oppose	Presi	dent	Senate	State: VA
Calendar Year-To-Date Per Election for Office Sought		121336.41	Disburseme 2024	ent For:	Primary	General
Full Name of Payee	, ,	Memo				Dissemination
Go Right Strategies				M M /		
Mailing Address 500 Westsure Dr #7075			_	06	10	2024
500 Westover Dr #7975			Amo	unt		
City	State	Zip Code				1062.50
Sanford	NC		Tra	nsaction ID	) : SE.6202	1002.00
Purpose of Expenditure	INC.	27330	Date	of Disburs	sement or O	bligation
TV/Radio Ad Production		Category/ Type		<sup>M</sup> 06	<sup>D</sup> <sup>D</sup> /	Y Y Y Y Y 2024
Name of Federal Candidate:		Support	Office Soug	ght: 🗙	House	District:05
GOOD, ROBERT G. HON., , ,		Oppose	Presi		Senate	State: VA
Calendar Year-To-Date Per Election for Office Sought		122398.91	Disburseme	ent For:	Primary	General
Per Election for Onice Sought	/]			Other (spe	cify) 🕨	
(a) SUBTOTAL of Itemized Independent Expenditures						21730.71
(b) SUBTOTAL of Unitemized Independent Expenditu	res		•			
				,	,	
(c) TOTAL Independent Expenditures			•		7	
Under penalty of perjury I certify that the independe with, or at the request or suggestion of, any candida party committee) any political party committee or its	ate or authorized					
Danie Skalla			M M /	DDD		Y Y
Denn, Stella, , , Signature		_ Date	e 07	02	202	4
				FEC SAL	pedule E (Ec	rm 3X) Rev. 05/2016
			Def			,

ITEMIZED INDEPENDENT EXPENDITURES				- F	PAGE 51	OF 56 24 OF FORM 3X	_
NAME OF COMMITTEE (In Full)					-		
COURAGEOUS CONSERVATIVES F	PAC						1
	-			С	C00587022		I,
Check if 24-hour report 48-hour report	New rep	ort Amends repo	ort filed on	M M /	D D /	Y Y Y Y	
Full Name of Payee		Memo	Item Date	e of Public	: Distribution/	/Dissemination	_
Go Right Strategies				<sup>M</sup> 06	<sup>D</sup> <sup>D</sup> <sup>/</sup>	Y Y Y Y	1
Mailing Address 500 Westover Dr #7975				00	10	2024	ł
			Amo	bunt			
City	State	Zip Code				1062.50	1
Sanford	NC	27330			D : SE.6203		T
Purpose of Expenditure		Category/	Date		rsement or C		÷.
TV/Radio Ad Production		Туре		06	10	2024	
Name of Federal Candidate:		Support	Office Sou	ght: D	K House	District: 05	_
MCGUIRE, JOHN, , ,		X Oppose		ident	Senate	State: VA	_
Calendar Year-To-Date			Disbursem		Primary		 I
Per Election for Office Sought	· · · ·	123461.41	2024	Other (sp			
Full Name of Payee		Memo	Item Date			/Dissemination	-
Go Right Strategies				M M /	D D /	Y Y Y Y	n.
Mailing Address				06	14	2024	J,
500 Westover Dr #7975			Amo	ount			
City	State	Zip Code				2092.50	1
Sanford	NC	27330			ID : SE.6222		ľ
Purpose of Expenditure		Category/		M M /	rsement or C	Y Y Y Y	n.
Radio Advertising		Туре		06	12	2024	J,
Name of Federal Candidate:		Support	Office Sou	ght: 🔰	K House	District: 05	_
GOOD, ROBERT G. HON., , ,		Oppose	Pres	ident	Senate	State: VA	_
Calendar Year-To-Date		120226.02	Disbursem	ent For:	Primary	/ General	I
Per Election for Office Sought	7 7	138336.93	2024	Other (sp	ecify) ►		
(a) SUBTOTAL of Itemized Independent Expenditures			• •			3155.00	
							1
(b) SUBTOTAL of Unitemized Independent Expenditur	res		• •				L
			_				1
(c) TOTAL Independent Expenditures			• •				I.
Under penalty of perjury I certify that the independe with, or at the request or suggestion of, any candida	ate or authorized						
party committee) any political party committee or its	agont.						
Denn, Stella, , ,		-	M M			Y Y	
Signature		_ Date	e 07	02	202		
L				FEC S	chedule E (Fo	orm 3X) Rev. 05/20	016
			Def	s' Al	ppx.	34	

ITEMIZED INDEPENDENT EXPENDITURES			PAGE 52 OF 56 FOR LINE 24 OF FORM 3X
NAME OF COMMITTEE (In Full)			FEC IDENTIFICATION NUMBER ▼
COURAGEOUS CONSERVATIVES F	PAC		C C00587022
Check if 24-hour report 48-hour report	New rep	ort Amends repo	ort filed on
Full Name of Payee		Memo	Item Date of Public Distribution/Dissemination
Go Right Strategies			06 / <sup>D</sup> / <sup>Y</sup> Y Y Y 06 14 2024
Mailing Address 500 Westover Dr #7975			Amount
City	State	Zip Code	2092.50
Sanford	NC	27330	Transaction ID : SE.6223 Date of Disbursement or Obligation
Purpose of Expenditure Radio Advertising		Category/ Type	M 06 / D D / Y Y Y Y 2024
Name of Federal Candidate:		Support	Office Sought: X House District: 05
MCGUIRE, JOHN, , ,		X Oppose	President State: VA
Calendar Year-To-Date Per Election for Office Sought	5	140429.43	Disbursement For:    X    Primary    General      2024     Other (specify) ▶
Full Name of Payee	Item Date of Public Distribution/Dissemination		
Go Right Strategies			06 / Y Y Y Y Y Y Y Y
Mailing Address Foo Westsver Dr #7075			06 13 2024
500 Westover Dr #7975			Amount
City	State	Zip Code	4500.00
Sanford	NC	27330	Transaction ID : SE.6226 Date of Disbursement or Obligation
Purpose of Expenditure Digital Advertising		Category/ Type	M 06 / D D / Y Y Y Y 12 / 2024
Name of Federal Candidate:		X Support	Office Sought: X House District: 05
GOOD, ROBERT G. HON., , ,		Oppose	President Senate State: VA
Calendar Year-To-Date Per Election for Office Sought	 л л	144929.43	Disbursement For:
(a) SUBTOTAL of Itemized Independent Expenditures.			6592.50
(b) SUBTOTAL of Unitemized Independent Expenditure	9S		Image: A state of the state
(c) TOTAL Independent Expenditures			
Under penalty of perjury I certify that the independer with, or at the request or suggestion of, any candidat party committee) any political party committee or its a	te or authorized		
Dann Stalla			MIM / DID / YIYIYIY
Denn, Stella, , , Signature		_ Date	e 07 02 2024
			FEC Schedule E (Form 3X) Rev. 05/20 Defs' Appx. 35

ITEMIZED INDEPENDENT EXPENDITURE	ES			PAGE 53 OF 56 FOR LINE 24 OF FORM 3X
NAME OF COMMITTEE (In Full)			F	FEC IDENTIFICATION NUMBER
COURAGEOUS CONSERVATIVES	S PAC			C C00587022
Check if 24-hour report 48-hour report	New rep	port Amends repo	ort filed on	M / D D / Y Y Y Y
Full Name of Payee		Memo	Item Date of	Public Distribution/Dissemination
Go Right Strategies				6 / D D / Y Y Y Y 2024
Mailing Address 500 Westover Dr #7975			Amount	
City	State	Zip Code		4500.00
Sanford	NC	27330		ction ID : SE.6227 Disbursement or Obligation
Purpose of Expenditure Digital Advertising		Category/ Type	M	66 / 12 / Y Y Y 2024
Name of Federal Candidate:		Support	Office Sought:	House District:05
MCGUIRE, JOHN, , ,		X Oppose	Presiden	
Calendar Year-To-Date Per Election for Office Sought	7 1 1 7	149429.43	Disbursement	For: X Primary General ner (specify) ▶
Full Name of Payee		Memo	Item Date of	Public Distribution/Dissemination
Go Right Strategies				13 Y Y Y Y Y 2024
Mailing Address 500 Westover Dr #7975				
			Amount	
City	State	Zip Code		357.50
Sanford	NC	27330		ction ID : SE.6228 Disbursement or Obligation
Purpose of Expenditure Graphic Design		Category/ Type		06 / D D / Y Y Y Y 12 / 2024
Name of Federal Candidate:		X Support	Office Sought:	House District:05
GOOD, ROBERT G. HON., , ,			Presiden	
Calendar Year-To-Date Per Election for Office Sought		149786.93	Disbursement 2024	For:
(a) SUBTOTAL of Itemized Independent Expenditu	res		•	4857.50
(b) SUBTOTAL of Uniternized Independent Expendent	litures		•	
(c) TOTAL Independent Expenditures			•	· · · · · · · · · ·
Under penalty of perjury I certify that the indepe with, or at the request or suggestion of, any can party committee) any political party committee or	didate or authorized			
Denn, Stella, , ,		D-4		02 / Y Y Y Y 02 2024
Signature		Date		
				FEC Schedule E (Form 3X) Rev. 05/2010 Appx. 36

ITEMIZED INDEPENDENT EXPENDITURES			PAGE 54 OF 56 FOR LINE 24 OF FORM 3X
NAME OF COMMITTEE (In Full)			FEC IDENTIFICATION NUMBER ▼
COURAGEOUS CONSERVATIVES F	PAC		C C00587022
Check if 24-hour report 48-hour report	New rep	ort Amends repo	rt filed on
Full Name of Pavee		Memo	Item Date of Public Distribution/Dissemination
Go Right Strategies			06 / Y Y Y Y Y 06 14 2024
Mailing Address 500 Westover Dr #7975			Amount
City	State	Zip Code	1105.00
Sanford	NC	27330	Transaction ID : SE.6229 Date of Disbursement or Obligation
Purpose of Expenditure Radio and TV Production		Category/ Type	06 / D D / Y Y Y Y 2024
Name of Federal Candidate:		Support	Office Sought: X House District: 05
GOOD, ROBERT G. HON., , ,		Oppose	President Senate State: VA
Calendar Year-To-Date Per Election for Office Sought	7	150891.93	Disbursement For:
Full Name of Payee	Item Date of Public Distribution/Dissemination		
Go Right Strategies			
Mailing Address			06142024
500 Westover Dr #7975			Amount
City	State	Zip Code	1105.00
Sanford	NC	27330	Transaction ID : SE.6230 Date of Disbursement or Obligation
Purpose of Expenditure Radio and TV Production		Category/ Type	06 / 12 / Y Y Y Y 2024
Name of Federal Candidate:		Support	Office Sought: X House District: 05
MCGUIRE, JOHN, , ,		Support	
Calendar Year-To-Date Per Election for Office Sought	7 7	151996.93	Disbursement For: X Primary General 2024 Other (specify) ▶
(a) SUBTOTAL of Itemized Independent Expenditures			2210.00
(b) SUBTOTAL of Unitemized Independent Expenditur	es		•
(c) TOTAL Independent Expenditures			•
Under penalty of perjury I certify that the independer with, or at the request or suggestion of, any candida party committee) any political party committee or its	te or authorized		
Dava Stalla			M M / D D / Y FY FY
Denn, Stella, , , Signature		_ Date	9 07 02 2024
			FEC Schedule E (Form 3X) Rev. 05/201 Defs' Appx. 37

ITEMIZED INDEPENDENT EXPENDITURES				-	PAGE 55	OF S	56 M 3X
NAME OF COMMITTEE (In Full)				I	-		-
COURAGEOUS CONSERVATIVES F	PAC			С	C00587022		
Check if 24-hour report 48-hour report	New rep	oort Amends repo	ort filed on	M M /	D D /	Y Y Y	Ŷ
							_
Full Name of Payee Neel & Partners		Memo	Item Date	of Public		Dissemination	Y
Mailing Address 8601 Ice House Dr		Amo				_	
Unit 7108		1					
City N Richland Hills	State TX	Zip Code 76180			D : SE.6219		2
Purpose of Expenditure			Date		rsement or		
Texting Voter Outreach		Category/ Type		06 /	11	Y Y Y 2024	
Name of Federal Candidate:		Support	Office Souce	ht: 🔉	K House	District:	05
GOOD, ROBERT G. HON., , ,		Oppose	Presi		Senate	State:	VA
Calendar Year-To-Date Per Election for Office Sought	7 7 7	136244.43	Disburseme	ent For: Other (sp	Primar ecify) ►	y Gei	neral
Full Name of Payee		Memo	Item Date	of Public	Distributior	/Disseminati	on
Woods, Waverly, , ,				M M /	11 D	Y Y Y 2024	
Mailing Address 2035 Lyndora Rd				_			
			Amo	unt			
City	State	Zip Code				1250.00	0
Virginia Beach	VA	23464			ID: SE.6204 rsement or		
Purpose of Expenditure Canvassing		Category/ Type		M M /	<sup>D</sup> 10	Y Y Y 2024	
Name of Federal Candidate:		Support	Office Souce	uht: N	K House	District:	05
GOOD, ROBERT G. HON., , ,		Oppose	Presi		Senate		/A
Calendar Year-To-Date Per Election for Office Sought		124711.41	Disburseme 2024		Primar	y Gei	neral
				Other (sp	ecity) 🕨		
(a) SUBTOTAL of Itemized Independent Expenditures			•			11533.02	
(b) SUBTOTAL of Unitemized Independent Expenditu	res						
				7			
(c) TOTAL Independent Expenditures			•				
Under penalty of perjury I certify that the independe with, or at the request or suggestion of, any candida party committee) any political party committee or its	ate or authorized						
Davie Challe			M = M /	D D		Y Y	
Denn, Stella, , , Signature		Date	e 07	02	20		
			Defs		<sup>chedule E (F</sup>	orm 3X) Rev.	05/2016

ITEMIZED INDEPENDENT EXPENDITURES				PAGE 56 OF 56 FOR LINE 24 OF FORM 3X
NAME OF COMMITTEE (In Full)				FEC IDENTIFICATION NUMBER ▼
COURAGEOUS CONSERVATIVES PAC				C C00587022
Check if 24-hour report 48-hour report N	lew repor	rt Amends repo	ort filed o	
Full Name of Payee		Memo	Item	Date of Public Distribution/Dissemination
Woods, Waverly, , ,				06 / Y Y Y Y 06 11 2024
Mailing Address 2035 Lyndora Rd				Amount
City State		Zip Code		1250.00
5	'A	23464		Transaction ID : SE.6206 Date of Disbursement or Obligation
Purpose of Expenditure Canvassing		Category/ Type		M 06 / D D / Y Y Y Y 2024
Name of Federal Candidate:		Support	Office	Sought: X House District: 05
MCGUIRE, JOHN, , ,		X Oppose		President Senate State: VA
Calendar Year-To-Date Per Election for Office Sought		125961.41	Disbur 2024	sement For: X Primary General
				Other (specify)
Full Name of Payee		Memo	Item	Date of Public Distribution/Dissemination
Mailing Address				
Mailing Address				Amount
City State		Zip Code		
				Date of Disbursement or Obligation
Purpose of Expenditure		Category/ Type		M M / D D / Y Y Y Y
Name of Federal Candidate:	I	Support	Office	Sought: House District:
		Oppose		President Senate State:
Calendar Year-To-Date Per Election for Office Sought			Disbur	sement For: Primary General
	7			Other (specify) ►
(a) SUBTOTAL of Itemized Independent Expenditures				1250.00
(b) SUBTOTAL of Unitemized Independent Expenditures				· · · · · · · · · · · · · · · · · · ·
(c) TOTAL Independent Expenditures				152594.08
Under penalty of perjury I certify that the independent expen with, or at the request or suggestion of, any candidate or aut party committee) any political party committee or its agent.				
Down Stalla			M	M / D D / Y Y Y Y
Denn, Stella, , , Signature		Date	9 07	02 2024
			De	FEC Schedule E (Form 3X) Rev. 05/2016 Efs' Appx. 39

FEC FORM 3X

10/15/2024 10 : 35

PAGE 1 / 45

# **REPORT OF RECEIPTS** AND DISBURSEMENTS For Other Than An Authorized Committee

					Of	fice Use Only
1. NAME OF COMMITTEE (in fu		OR PRINT ▼	Example: over the l	If typing, type ines.	12FE4M5	
COURAGEOUS		VATIVES PAC				
	154	alifax Ct				
ADDRESS (number and						
Check if differ						
than previously reported. (ACC		rlton				08053
2. FEC IDENTIFICA	TION NUMBE		TY 🔺		STATE A	ZIP CODE
C C00587022		· · · · · ·	IS THIS REPORT	NEW (N) OR	× AMEN (A)	DED
4. TYPE OF REPO	DRT (b)		b 20 (M2)	May 20 (M5)	) Aug 20 (	(M8) Nov 20 (M11) (Non-Election
(Choose One)		Report Due On: Ma	ır 20 (M3)	Jun 20 (M6)	Sep 20 (	Year Only) (M9) Dec 20 (M12)
(a) Quarterly Repo	orts:		r 20 (M4)	Jul 20 (M7)	Oct 20 (	Year Only)
April 15 Quarterly	Report (Q1)			<u> </u>		
July 15 Quarterly	Report (Q2)	(C) 12-Day PRE-Election	× Prima	ry (12P)	General (120	a) Runoff (12R)
October 1	5	Report for the:	Conve	ention (12C)	Special (12S)	)
January 3	Report (Q3) 1 Report (YE)	Electi	on on	7 / <sup>D</sup> D / 30	2024	in the AZ
July 31 Mi Report (No Year Only)	on-election	(d) 30-Day POST-Election Report for the:	Gene	ral (30G)	Runoff (30R)	Special (30S)
Terminatio (TER)	n Report	·	on on	M / D D /	Y Y Y Y Y	in the State of
5. Covering Period	07	01 / Y Y Y 01 2024		ough 07	/ D D / Y 10	Y Y Y 2024
I certify that I have exa			f my knowledge	e and belief it is tr	rue, correct and co	mplete.
Type or Print Name of	Treasurer De	nn, Stella, , ,				
Signature of Treasurer	Denn, Stella	.,,			Date 10 /	D D / Y Y Y Y 15 / 2024
NOTE: Submission of fal	se, erroneous, o	or incomplete information	on may subject t	the person signing	this Report to the p	enalties of 52 U.S.C. § 30109.
Office Use Only						FEC FORM 3X Rev. 05/2016
	I		1	1	Defs' A	ppx. 40
						I I I I I I I I I I I I I I I I I I I

#### SUMMARY PAGE OF RECEIPTS AND DISBURSEMENTS

Page 2

Write or Type Committee Name

FEC Form 3X (Rev. 05/2016)

	COURAGEOUS CONSERVATIVE	ES PAC	
	Report Covering the Period: From:	07 / 01 / Y Y Y Y 2024 To	o: 07 / 10 / Y Y Y Y 10 2024
		COLUMN A This Period	COLUMN B Calendar Year-to-Date
6.	(a) Cash on Hand January 1, 2024		7251.26
	(b) Cash on Hand at Beginning of Reporting Period	17834.33	
	(c) Total Receipts (from Line 19)	10000.00	185597.15
	<ul> <li>(d) Subtotal (add Lines 6(b) and</li> <li>6(c) for Column A and Lines</li> <li>6(a) and 6(c) for Column B)</li> </ul>	27834.33	192848.41
7.	Total Disbursements (from Line 31)	10450.00	175464.08
8.	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	17384.33	17384.33
9.	Debts and Obligations Owed <b>TO</b> the Committee (Itemize all on Schedule C and/or Schedule D)	0.00	
10	<ol> <li>Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)</li> </ol>	324251.32	

This committee has qualified as a multicandidate committee. (see FEC FORM 1M)

For further information, contact the Federal Election Commission at 800-424-9530 or visit www.fec.gov

Imano#	202/101	15968543995	a

of Receipts

FEC Form 3X (Rev. 05/2016)

Write or Type Committee Name

## COURAGEOUS CONSERVATIVES PAC

Report Covering the Period:         From:         M m         / D + D         / Y + Y + Y         Y <th< th=""></th<>					
I. Receipts	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date			
. Contributions (other than loans) From:					
(a) Individuals/Persons Other					
Than Political Committees					
(i) Itemized (use Schedule A)	10000.00	20597.15			
(ii) Unitemized	0.00	0.00			
(iii) TOTAL (add					
Lines 11(a)(i) and (ii)	10000.00	20597.15			
	0.00	0.00			
(b) Political Party Committees	0.00	0.00			
(c) Other Political Committees	0.00	165000.00			
(such as PACs) (d) Total Contributions (add Lines					
(d) Total Contributions (add Lines 11(a)(iii), (b), and (c)) (Carry					
Totals to Line 33, page 5)	10000.00	185597.15			
Transfers From Affiliated/Other					
Party Committees	0.00	0.00			
All Loans Received	0.00	0.00			
Loan Repayments Received	0.00	0.00			
Offsets To Operating Expenditures	-757555.				
(Refunds, Rebates, etc.)					
(Carry Totals to Line 37, page 5)	0.00	0.00			
Refunds of Contributions Made					
to Federal Candidates and Other					
Political Committees	0.00	0.00			
Other Federal Receipts					
(Dividends, Interest, etc.)	0.00	0.00			
Transfers from Non-Federal and Levin Funds					
(a) Non-Federal Account					
(from Schedule H3)	0.00	0.00			
(b) Levin Funds (from Schedule H5)	0.00	0.00			
(c) Total Transfers (add 18(a) and 18(b))	0.00	0.00			
Total Receipts (add Lines 11(d),		105507.45			
12, 13, 14, 15, 16, 17, and 18(c))▶	10000.00	185597.15			
Total Federal Receipts					
(subtract Line 18(c) from Line 19)▶	10000.00	185597.15			

Defs' Appx. 42

Page 3

of Disbursements

FEC Form 3X (Rev. 05/2016) Page 4 COLUMN A COLUMN B **II. Disbursements Total This Period Calendar Year-to-Date** 21. Operating Expenditures: Allocated Federal/Non-Federal (a) Activity (from Schedule H4) 0.00 0.00 Federal Share ..... (i) 0.00 0.00 (ii) Non-Federal Share..... (b) Other Federal Operating 2000.00 4420.00 Expenditures ..... (c) Total Operating Expenditures 4420.00 (add 21(a)(i), (a)(ii), and (b)) 2000.00 22. Transfers to Affiliated/Other Party Committees..... 0.00 0.00 23 Contributions to Federal Candidates/Committees 10000.00 0.00 and Other Political Committees... 24. Independent Expenditures (use Schedule E).... Coordinated Party Expenditures (52 U.S.C. § 30116(d)) (use Schedule F).... 8450.00 161044.08 25. 0.00 0.00 26. Loan Repayments Made..... 0.00 0.00 Loans Made.... Refunds of Contributions To: (a) Individuals/Persons Other 0.00 27. 28. 0.00 Than Political Committees 0.00 0.00 (b) Political Party Committees ..... 0.00 0.00 Other Political Committees (C) (such as PACs)..... 0.00 0.00 Total Contribution Refunds (d) (add Lines 28(a), (b), and (c))...... 0.00 0.00 29. Other Disbursements (Including 0.00 Non-Federal Donations)..... 0.00 30. Federal Election Activity (52 U.S.C. § 30101(20)) (a) Allocated Federal Election Activity (from Schedule H6) (i) Federal Share .... 0.00 0.00 (ii) "Levin" Share..... 0.00 0.00 (b) Federal Election Activity Paid Entirely With Federal Funds ..... 0.00 0.00 Total Federal Election Activity (add (C) Lines 30(a)(i), 30(a)(ii) and 30(b)) ..... 0.00 0.00 31. Total Disbursements (add Lines 21(c), 22, 23, 24, 25, 26, 27, 28(d), 29 and 30(c)).. 10450.00 175464.08 32. Total Federal Disbursements (subtract Line 21(a)(ii) and Line 30(a)(ii) from Line 31)..... 10450.00 175464.08

of Disbursements

COLUMN A

**Total This Period** 

#### III. Net Contributions/ Operating Expenditures

33.	Total Contributions (other than loans)
	(from Line 11(d), page 3)
34.	Total Contribution Refunds
	(from Line 28(d))
35.	Net Contributions (other than loans)
	(subtract Line 34 from Line 33)
36.	Total Federal Operating Expenditures
	(add Line 21(a)(i) and Line 21(b))
37.	Offsets to Operating Expenditures
	(from Line 15, page 3)
38.	Net Operating Expenditures

(subtract Line 37 from Line 36) .....

Γ.	Ţ	-	Ţ	Ţ	-	10000.00
						0.00
+	÷	-	÷	÷	-	
<u>_</u>	÷	-	÷	÷	-7	10000.00
		-			7	2000.00
						0.00
		1000				
÷	÷	-7-	÷	÷	7	2000.00

185597.15				
103397.13	-7		-7	<u></u>
0.00				
0.00	-		-7	
185597.15				
100007.10	-		7	<u> </u>
4420.00				
1120.00	7		7	<u></u>
0.00				
0.00	-7		-7	<u></u>
4420.00				
		 		 1.1.1

COLUMN B

Calendar Year-to-Date



## SCHEDULE A (FEC Form 3X) ITEMIZED RECEIPTS

Use separate schedule(s) for each category of the

FOR LINE NUMBER:

(check only one)

PAGE 6 OF

45

			Detailed Summary Page		X	11a		11b	11c		12		_
Ar	ny information copied from such Reports and Stat for commercial purposes, other than using the n	ements ma	ay not be sold or used by a	any pers	on f	13 or the picit corr	purp	14 ose of	15 soliciting		16 ntribut	ions	7
	NAME OF COMMITTEE (In Full) COURAGEOUS CONSERVATIV								ITOTT SUC			90.	
<u> </u>	Full Name of Individual (Last, First, Middle Initial LPL Financial LLC Mailing Address 4707 Executive Dr	) or Full O	Organization Name			Date of	Red	ceipt	) / Y	2(	024	Y	
	City San Diego	State CA	Zip Code 92121		A	Trans		on ID :	SA11AI. Receipt th	.6268	8		
	FEC ID number of contributing federal political committee.	С						,	-	1(	0000.0	00	]
	Name of Employer (for Individual)	Occ	cupation (for Individual)			Me	emo	ltem					
	Receipt For:         Primary       General         Other (specify) ▼	Aggregate	Year-to-Date ▼ 10000.00	)									
B.	Full Name of Individual (Last, First, Middle Initial	) or Full O	Organization Name			Date of	Ree	ceipt					
	Mailing Address	State	Zip Code			M = M	/		) / Y	Y	Y	Y	
					4	Mount	of	Each F	Receipt th	nis P	'eriod	_	l
	FEC ID number of contributing federal political committee.	С						-		_	1 40		I.
	Name of Employer (for Individual)	Occ	cupation (for Individual)			Me	emo	Item					
	Receipt For:         Primary       General         Other (specify) ▼	Aggregate	Year-to-Date V										
c.	Full Name of Individual (Last, First, Middle Initial	) or Full O	Organization Name		[	Date of	Ree	ceipt					
	Mailing Address	01-1-	Zie Oste			M = M	/	D E	D / Y	Y	Y	Y	
	City	State	Zip Code		A	Amount	of	Each F	Receipt th	nis P	'eriod		
	FEC ID number of contributing federal political committee.	С						,	9	_			]
	Name of Employer (for Individual)	Occi	supation (for Individual)			Me	emo	ltem					
	Receipt For: Primary General Other (specify)	Aggregate	Year-to-Date V										
s	UBTOTAL of Receipts This Page (optional)			····· <b>Þ</b>				,	7	10	0000.0	0	]
-	OTAL This Pariod (last page this line number on	[v)			- [					1(	0000.0	00	1

TOTAL This Period (last page this line number only)......



SCHEDULE B (FEC Form 3X)				INE NUMBER: PAGE 7 OF 45						
ITEMIZED DISBURSEMENTS	VENELING for each actoriary of the									
		Summary Page			2 8b	23 28c	2		27 30b	
Any information copied from such Reports and State		not be cold or use						-		ne
or for commercial purposes, other than using the na										
NAME OF COMMITTEE (In Full)										
COURAGEOUS CONSERVATIVI	ES PAC									
Full Name (Last, First, Middle Initial)				_						
A. PAC Management Services LLC						isburse				_
Mailing Address 441 N Lee St Ste 100					07	/ D	)1		2024	
City	State	Zip Code		FE		tificatio	n Num	hor		
Alexandria	VA	22314				lincalio	ii inuiii	Dei		
Purpose of Disbursement										
Compliance Services					Trans	saction	ID : S	B21B.6	6264	
Canuluale Manie			Category/	Am	ount c	f Each	Disbu	semer	nt this Pe	eriod
Office Sought: House Disburse	ement For:		Туре	$\neg \Box$					1000.00	
Senate	Primary	General						-		
State: District:	Other (spe	cify) ▼			Mem	o Item				
Full Name (Last, First, Middle Initial)										
D				Da	e of D	isburse	ement			
B. Woods, Waverly, , ,				М	M	/ D	D /	Y	Y Y Y	
Mailing Address 2035 Lyndora Rd	ress 2035 Lyndora Rd				07 09 2024					
City	State	Zip Code		FE	C Iden	tificatio	n Num	ber		
Virginia Beach	VA	23464								
Purpose of Disbursement Admin Services			C							
Candidate Name						action				
			Category/ Type	Am	ount c	t Each	Disbui	semer	nt this Pe	eriod
Office Sought: House Disburse	ement For:		.)po						1000.00	
Senate	Primary	General				-			1.45	
President	Other (spe	cify)			Mem	o Item				
State: District:	-				wichti					
Full Name (Last, First, Middle Initial)				_						
С.				Da	e of D	lisburse	ement			
Mailing Address				М	М	/ D	D /	Y	Y Y Y	
Maning Address					-			<u> </u>		
City	State	Zip Code		FE	C Iden	tificatio	n Num	ber		
Purpose of Disbursement				C						
							_	_		
Candidate Name			Category/ Type	Am	Amount of Each Disbursement this Period				eriod	
Office Sought: House Disburse	ement For:	·				-		-	1.40	
Senate	Primary	General								
President	Other (spe	cify) 🔻			Mem	o Item				
State: District:										
SUBTOTAL of Disbursements This Page (optional).			••••••			-		,	2000.00	)
									2000.00	)
TOTAL This Period (last page this line number only	/)		•••••• •	· L		,	_	,	2000.00	·



### SCHEDULE E (FEC Form 3X) ITEMIZED INDEPENDENT EXPENDITURES

ITEMIZED INDEPENDENT EXPENDITURES	6			PAGE 45 OF 45 FOR LINE 24 OF FORM 3X
NAME OF COMMITTEE (In Full)				FEC IDENTIFICATION NUMBER ▼
COURAGEOUS CONSERVATIVES	PAC			C C00587022
Check if 24-hour report 48-hour report	New rep	ort Amends repo	ort filed	on/ D = D / Y = Y = Y
Full Name of Payee		Memo	Item	Date of Public Distribution/Dissemination
Go Right Strategies				07 / <sup>D</sup> / <sup>Y</sup> Y Y Y 10 2024
Mailing Address 500 Westover Dr #7975				Amount
City	State	Zip Code		8450.00
Sanford	NC	27330		Transaction ID : SE.6260 Date of Disbursement or Obligation
Purpose of Expenditure Radio Ads		Category/ Type		07 / D D / Y Y Y Y 2024
Name of Federal Candidate:		Support	Office	Sought: X House District: 01
SCHWEIKERT, DAVID S., , ,		X Oppose		President Senate State: AZ
Calendar Year-To-Date Per Election for Office Sought		8450.00	Disbu 2024	rsement For: X Primary General
			<u> </u>	Other (specify) ►
Full Name of Payee		🗌 Memo	ltem	Date of Public Distribution/Dissemination
Mailing Address				
				Amount
City	State	Zip Code		
				Date of Disbursement or Obligation
Purpose of Expenditure		Category/ Type		
Name of Federal Candidate:		Support Oppose	Office	Sought:     House     District:       President     Senate     State:
Calendar Year-To-Date Per Election for Office Sought	7 7		Disbu	rsement For: Primary General Other (specify) ►
(a) SUBTOTAL of Itemized Independent Expenditure	S		•	8450.00
(b) SUBTOTAL of Unitemized Independent Expendit	ures		•	
(c) TOTAL Independent Expenditures			•	8450.00
Under penalty of perjury I certify that the independ with, or at the request or suggestion of, any candid party committee) any political party committee or it	date or authorized			
Dann Stalla			М	M / D D / Y Y Y Y
Denn, Stella, , , Signature		Date	e 1(	0 15 2024
			D	FEC Schedule E (Form 3X) Rev. 05/2016 efs' Appx. 47

Image#	20241	002968	4778183
--------	-------	--------	---------

FEC FORM 3X

10/02/2024 12 : 15

PAGE 1 / 43

## **REPORT OF RECEIPTS** AND DISBURSEMENTS For Other Than An Authorized Committee

									Office U	se Only	
1.	NAME ( COMMI	DF ITEE (in full)	TYPE (	or print ▼		ample: If ty er the lines		12FI	E4M5		
	OURA	GEOUS CON	ISER\	ATIVES							
AD	DRESS (r	number and street)	5 Ha	lifax Ct							
	, Che	eck if different									
		n previously orted. (ACC)	Marl	ton 				NJ	08053	3	
2.	FEC ID	ENTIFICATION N	UMBER	. ▼	CITY <b>A</b>			STATE		ZIP CO	DE 🔺
	C	C00587022			3. IS THIS REPORT	×	NEW (N) <b>OR</b>		AMENDED (A)		
4.	(Choose		(b)	Monthly Report	Feb 20 (M2	)	May 20 (M5)	)	Aug 20 (M8)		Nov 20 (M11) (Non-Election
		arterly Reports:		Due On:	Mar 20 (M3	)	Jun 20 (M6)		Sep 20 (M9)		Year Only) Dec 20 (M12) (Non-Election
	(a) Qua	2			Apr 20 (M4)		Jul 20 (M7)		Oct 20 (M10)		Year Only) Jan 31 (YE)
	<u> </u>	April 15 Quarterly Report (	Q1) (	c) 12-Day		Primary (1	12P)	Ge	neral (12G)		Runoff (12R)
	Ц.	July 15 Quarterly Report (	Q2)	<b>PRE</b> -Elec Report fo		Conventio	n (12C)	Sp	ecial (12S)		
	×	October 15 Quarterly Report (	Q3)			M	/ D D /	YY	YY	in the	
		January 31 Year-End Report (	YE)		Election on			L		State o	f
		July 31 Mid-Year Report (Non-electi Year Only) (MY)	on	d) 30-Day <b>POST</b> -El Report fo		General (	30G)	Ru	noff (30R)		Special (30S)
		Termination Repor (TER)	t	·	Election on	M = M =	/ D D /	YYY	Y Y	in the State o	f
5.	Covering	g Period 0	M / )7	D D / Y 11	2024	through	n 09	/ D 30	D / Y Y 20	24	
l ce	ertify that	I have examined t	his Repo	ort and to the	best of my kno	owledge an	id belief it is tr	rue, corre	ct and comple	te.	
Тур	e or Print	t Name of Treasur	er	n, Stella, , ,							
Sig	nature of	Treasurer Der	ın, Stella, ,	,				Date	10 / D2	D /	Y Y Y Y 2024
NO	TE: Subm	ission of false, error	neous, or	incomplete in	formation may s	ubject the p	person signing	this Repo	rt to the penalti	es of 52	U.S.C. § 30109
-	U	fice se nly								<b>FOR</b> Rev. 05/20	
		,		<u>    I                                </u>		1		Def	s' App	)X. 4	48

#### SUMMARY PAGE OF RECEIPTS AND DISBURSEMENTS

Page 2

Write or Type Committee Name

FEC Form 3X (Rev. 05/2016)

	COURAGEOUS CONSERVATIVE	ES PAC	
	Report Covering the Period: From:	07 / D D / Y Y Y Y 11 2024 To:	09 / D D / Y Y Y Y 30 / 2024
		COLUMN A This Period	COLUMN B Calendar Year-to-Date
6.	(a) Cash on Hand January 1, 2024	[	7251.26
	(b) Cash on Hand at Beginning of Reporting Period	17384.33	
	(c) Total Receipts (from Line 19)	0.00	185597.15
	<ul> <li>(d) Subtotal (add Lines 6(b) and</li> <li>6(c) for Column A and Lines</li> <li>6(a) and 6(c) for Column B)</li> </ul>	17384.33	192848.41
7.	Total Disbursements (from Line 31)	1775.00	177239.08
8.	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	15609.33	15609.33
9.	Debts and Obligations Owed <b>TO</b> the Committee (Itemize all on Schedule C and/or Schedule D)	0.00	
10	<ol> <li>Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)</li> </ol>	324251.32	

This committee has qualified as a multicandidate committee. (see FEC FORM 1M)

For further information, contact the Federal Election Commission at 800-424-9530 or visit www.fec.gov

Image#	20241	0029684	778185
--------	-------	---------	--------

of Receipts

FEC Form 3X (Rev. 05/2016)

Write or Type Committee Name

## COURAGEOUS CONSERVATIVES PAC

Report Covering the Period: From: 07	M / D D / Y Y Y Y 11 2024 To:	09 30 2024
I. Receipts	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
11. Contributions (other than loans) From:		
(a) Individuals/Persons Other		
Than Political Committees	0.00	20597.15
(i) Itemized (use Schedule A)		20097.10
(ii) Unitemized	0.00	0.00
(iii) TOTAL (add		
Lines 11(a)(i) and (ii)	0.00	20597.15
(b) Political Party Committees	0.00	0.00
(c) Other Political Committees		
(such as PACs)	0.00	165000.00
(d) Total Contributions (add Lines		
11(a)(iii), (b), and (c)) (Carry		
Totals to Line 33, page 5)▶	0.00	185597.15
12. Transfers From Affiliated/Other		
Party Committees	0.00	0.00
	0.00	0.00
13. All Loans Received	0.00	0.00
14. Loan Repayments Received	0.00	0.00
15. Offsets To Operating Expenditures		
(Refunds, Rebates, etc.)		
(Carry Totals to Line 37, page 5)	0.00	0.00
<ol><li>Refunds of Contributions Made</li></ol>		
to Federal Candidates and Other		
Political Committees	0.00	0.00
17. Other Federal Receipts		0.00
(Dividends, Interest, etc.)	0.00	0.00
18. Transfers from Non-Federal and Levin Funds		
(a) Non-Federal Account	0.00	0.00
(from Schedule H3)	0.00	0.00
	0.00	0.00
(b) Levin Funds (from Schedule H5)	0.00	0.00
(c) Total Transfers (add 18(a) and 18(b))	0.00	0.00
<ol> <li>Total Receipts (add Lines 11(d), 12, 13, 14, 15, 16, 17, and 18(c))</li> </ol>	0.00	185597.15
	1	
20. Total Federal Receipts		
(subtract Line 18(c) from Line 19)▶	0.00	185597.15



Defs' Appx. 50	
----------------	--

Page 3

I

## DETAILED SUMMARY PAGE

of Disbursements

	FEC Form 3X (Rev. 05/2016)	of Disbursements	Page <b>4</b>		
	II. Disbursements	II. Disbursements COLUMN A Total This Period			
1. Operating Expenditures: (a) Allocated Federal/Non-Federal Activity (from Schedule H4)			Calendar Year-to-Date		
	(i) Federal Share	0.00	0.00		
	(ii) Non-Federal Share	0.00	0.00		
(b)	) Other Federal Operating Expenditures	1775.00	6195.00		
(C)		1775.00	6195.00		
	(add 21(a)(i), (a)(ii), and (b))				
Сс	ommitteesontributions to ontributions to ederal Candidates/Committees	0.00	0.00		
an	d Other Political Committees	0.00	10000.00		
(u: Cc	se Schedule E)	0.00	161044.08		
(5)	2 U.S.C. § 30116(d)) se Schedule F)	0.00	0.00		
Lo	an Repayments Made	0.00	0.00		
Lo	ans Made	0.00	0.00		
Refunds of Contributions To: (a) Individuals/Persons Other					
	Than Political Committees	0.00	0.00		
(b) (c)	·	0.00	0.00		
( -1)	(such as PACs)	0.00	0.00		
(d)	) Total Contribution Refunds (add Lines 28(a), (b), and (c))	0.00	0.00		
	her Disbursements (Including				
	on-Federal Donations)	0.00	0.00		
Fe (a)	<ul> <li>deral Election Activity (52 U.S.C. § 30101)</li> <li>Allocated Federal Election Activity (from Schedule H6)</li> </ul>	20))			
	(i) Federal Share	0.00	0.00		
	(ii) "Levin" Share	0.00	0.00		
(b)	) Federal Election Activity Paid Entirely With Federal Funds	0.00	0.00		
(C)	Total Federal Election Activity (add Lines 30(a)(i), 30(a)(ii) and 30(b))	0.00	0.00		
-					
	tal Disbursements (add Lines 21(c), 22, , 24, 25, 26, 27, 28(d), 29 and 30(c))	1775.00	177239.08		
	tal Federal Disbursements				
	ubtract Line 21(a)(ii) and Line 30(a)(ii) m Line 31)	1775.00	177239.08		

of Disbursements

COLUMN A

**Total This Period** 

FEC	Form	3X	(Rev.	05/2016	)
1 20		0/1	(110 .	00/2010	,

#### III. Net Contributions/ Operating Expenditures

33.	Total Contributions (other than loans)
	(from Line 11(d), page 3)
34.	Total Contribution Refunds
	(from Line 28(d))
35.	Net Contributions (other than loans)
	(subtract Line 34 from Line 33)
36.	Total Federal Operating Expenditures
	(add Line 21(a)(i) and Line 21(b))
37.	Offsets to Operating Expenditures
	(from Line 15, page 3)
38.	Net Operating Expenditures
	(subtract Line 37 from Line 36)

E.							0.00	
		-7			7	-		
							0.00	
			1		-		- 49- 1	
							0.00	
	1	- 7	1		- 7			_
<b>_</b>						1	775.00	
		-			,		775.00	
E	-	-7-	-	-	-7-	-		
						-		
	+		-	-		-	0.00	

185597.15						
100007.10	7			7		<u></u>
0.00						
0.00	-7			-1		
185597.15						
	-	-	-	-J-	-	
6195.00						
	-7			7		
0.00						
	7			7		
6195.00						
				-7-		1. A. A.

COLUMN B

Calendar Year-to-Date



SCHEDULE B (FEC Form 3X)		arato schodula(a)	-	FOR LINE NUMBER: PAGE 6 OF 43 (check only one)		
TEMIZED DISBURSEMENTS	NTS Use separate schedule(s) for each category of the Detailed Summary Page (check or 21 28			22 23 26 27		
Any information copied from such Reports and State or for commercial purposes, other than using the na						
NAME OF COMMITTEE (In Full)						
COURAGEOUS CONSERVATIV	ES PAC					
Full Name (Last, First, Middle Initial)						
A. Camelback Fundraising				Date of Disbursement		
Mailing Address 3104 E Camelback Rd #7357				07 24 2024		
City Phoenix	State AZ	Zip Code 85016		FEC Identification Number		
Purpose of Disbursement				С		
Fundraising Commission				Transaction ID : SB21B.6270		
Candidate Name			Category/ Type	Amount of Each Disbursement this Period		
Office Sought: House Disburse	ement For:		.,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	1000.00		
President	Other (spe	General cify) ▼		Memo Item		
State: District:						
Full Name (Last, First, Middle Initial) PAC Management Services LLC				Date of Disbursement		
	-					
Mailing Address 441 N Lee St Ste 100	-					
City	State	Zip Code		FEC Identification Number		
Alexandria Purpose of Disbursement	VA	22314				
Compliance Services				С		
Candidate Name				Transaction ID : SB21B.6272		
			Category/ Type	Amount of Each Disbursement this Period		
Office Sought: House Disburse	ement For:		.,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	700.00		
Senate	Primary	General				
President	Other (spe	cify)		Memo Item		
State: District:				Mento item		
Full Name (Last, First, Middle Initial)				Date of Disbursement		
Mailing Address				M = M / D = D / Y = Y = Y = Y		
City	State	Zip Code		FEC Identification Number		
Purpose of Disbursement		С				
Candidate Name	Category/ Type	Amount of Each Disbursement this Period				
Office Sought: House Disburse	ement For:					
Senate	Primary	General				
President	Other (spe	cify) 🔻		Memo Item		
State: District:						
SUBTOTAL of Disbursements This Page (optional)			••••••	1700.00		
				4700.00		
TOTAL This Period (last page this line number only	y)		••••••	1700.00		



Image#	202411	269720	052087
--------	--------	--------	--------

2.

Termination Report

(TER)

11/26/2024 16 : 28

PAGE 1 / 44

Nov 20 (M11) (Non-Election Year Only)

Dec 20 (M12) (Non-Election Year Only)

Jan 31 (YE)

Runoff (12R)

Special (30S)

in the

State of

1

Image# 202411269720052087		<b>11/26/20</b> PAGE 1 /
	PORT OF RECEIPTS ID DISBURSEMENTS Other Than An Authorized Committee	Office Use Only
1. NAME OF TYP COMMITTEE (in full)	E OR PRINT ▼ Example: If typing, type over the lines.	12FE4M5
ADDRESS (number and street)	Halifax Ct	NJ 08053 -
2. FEC IDENTIFICATION NUMB	CITY▲ 3. IS THIS REPORT X NEW (N) OR	AMENDED (A)
<ul> <li>4. TYPE OF REPORT (Choose One)</li> <li>(a) Quarterly Reports:</li> <li>April 15</li> </ul>	b) Monthly Report Due On: Apr 20 (M2) May 20 (M5) Jun 20 (M5) Jun 20 (M6) Jul 20 (M7)	Aug 20 (M8)         Nov (Non-E Year C           Sep 20 (M9)         Dec (Non-f Year C           Oct 20 (M10)         Jan
Quarterly Report (Q1) July 15 Quarterly Report (Q2) October 15 Quarterly Report (Q3) January 31 Year-End Report (YE)	(c) 12-Day PRE-Election Report for the: Convention (12C) Election on Convention (12C)	General (12G) Runo Special (12S) In the State of
July 31 Mid-Year Report (Non-election Year Only) (MY)	(d) 30-Day <b>POST</b> -Election X General (30G) Report for the:	Runoff (30R) Spec

24 2. § 30109.						
Type or Print Name of Treasurer						
-						

M M

11

Election on

D D

05

Y

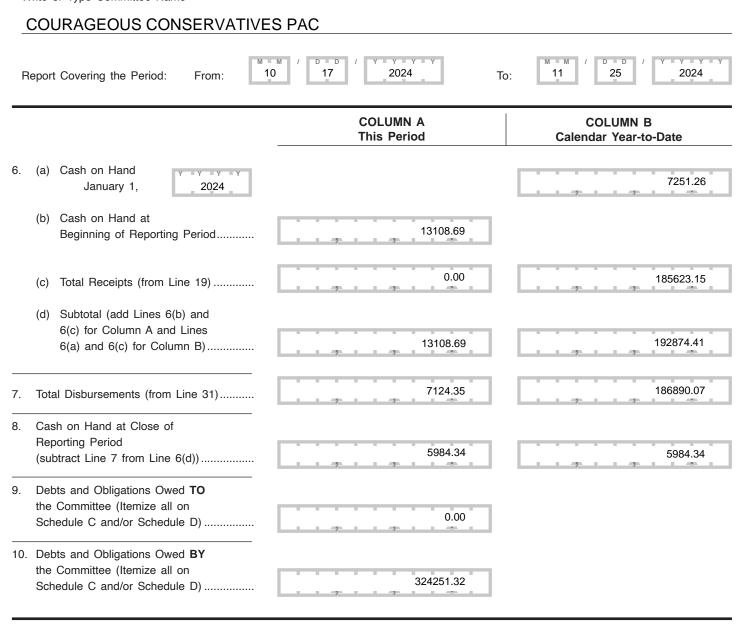
2024

#### SUMMARY PAGE OF RECEIPTS AND DISBURSEMENTS

Page 2

Write or Type Committee Name

FEC Form 3X (Rev. 05/2016)



This committee has qualified as a multicandidate committee. (see FEC FORM 1M)

For further information, contact the Federal Election Commission at 800-424-9530 or visit www.fec.gov

Image#	202411	269720	052089
mugen	202411	200120	002000

of Receipts

FEC Form 3X (Rev. 05/2016)

Write or Type Committee Name

## COURAGEOUS CONSERVATIVES PAC

Report Covering the Period: From:		b: 11 / 25 / Y Y Y Y 2024
I. Receipts	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
11. Contributions (other than loans) From:		I
(a) Individuals/Persons Other		
Than Political Committees	0.00	20622.15
(i) Itemized (use Schedule A)	0.00	20022.13
(ii) I laiteaning d	0.00	1.00
(ii) Unitemized (iii) TOTAL (add		
Lines 11(a)(i) and (ii)	0.00	20623.15
(b) Political Party Committees	0.00	0.00
(c) Other Political Committees		
(such as PACs)	0.00	165000.00
(d) Total Contributions (add Lines		
11(a)(iii), (b), and (c)) (Carry		
Totals to Line 33, page 5)	0.00	185623.15
12. Transfers From Affiliated/Other		
Party Committees	0.00	0.00
13. All Loans Received	0.00	0.00
14. Loan Repayments Received	0.00	0.00
15. Offsets To Operating Expenditures		
(Refunds, Rebates, etc.)		
(Carry Totals to Line 37, page 5)	0.00	0.00
16. Refunds of Contributions Made		
to Federal Candidates and Other		
Political Committees	0.00	0.00
17. Other Federal Receipts		
(Dividends, Interest, etc.)	0.00	0.00
18. Transfers from Non-Federal and Levin Funds		
(a) Non-Federal Account		
(from Schedule H3)	0.00	0.00
(b) Levin Funds (from Schedule H5)	0.00	0.00
(c) Total Transfers (add 18(a) and 18(b))	0.00	0.00
19. Total Receipts (add Lines 11(d),		
12, 13, 14, 15, 16, 17, and 18(c))▶	0.00	185623.15
12, 10, 17, 10, 17, and 10(0))	0.00	
20. Total Federal Receipts		
(subtract Line 18(c) from Line 19)▶	0.00	185623.15

Defs' Appx. 56

Page 3

I

## DETAILED SUMMARY PAGE

of Disbursements

FEC Form 3X (Rev. 05/2016)	of Disbursements	Page 4
II. Disbursements	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
Operating Expenditures: (a) Allocated Federal/Non-Federal Activity (from Schedule H4)		
(i) Federal Share	0.00	0.00
(ii) Non-Federal Share	0.00	0.00
(b) Other Federal Operating Expenditures	6124.35	13845.99
(c) Total Operating Expenditures		
(add 21(a)(i), (a)(ii), and (b))► Transfers to Affiliated/Other Party	6124.35	13845.99
Committees Contributions to	0.00	0.00
Federal Candidates/Committees and Other Political Committees	0.00	10000.00
Independent Expenditures (use Schedule E)	1000.00	163044.08
Coordinated Party Expenditures (52 U.S.C. § 30116(d)) (use Schedule F)	0.00	0.00
Loan Repayments Made	0.00	0.00
Loans Made Refunds of Contributions To:	0.00	0.00
(a) Individuals/Persons Other Than Political Committees	0.00	0.00
(b) Political Party Committees	0.00	0.00
(c) Other Political Committees (such as PACs)	0.00	0.00
(d) Total Contribution Refunds		
(add Lines 28(a), (b), and (c))	0.00	0.00
Other Disbursements (Including Non-Federal Donations)	0.00	0.00
,	0.00	
Federal Election Activity (52 U.S.C. § 30101( (a) Allocated Federal Election Activity	20))	
(from Schedule H6)		
(i) Federal Share	0.00	0.00
<ul><li>(ii) "Levin" Share</li><li>(b) Federal Election Activity Paid</li></ul>	0.00	0.00
(b) Federal Election Activity Paid Entirely With Federal Funds	0.00	0.00
(c) Total Federal Election Activity (add Lines 30(a)(i), 30(a)(ii) and 30(b))	0.00	0.00
		0.00
Total Disbursements (add Lines 21(c), 22, 23, 24, 25, 26, 27, 28(d), 29 and 30(c))	7124.25	186890.07
	7124.35	100090.07
Total Federal Disbursements (subtract Line 21(a)(ii) and Line 30(a)(ii)		
from Line 31)	7124.35	186890.07

of Disbursements

COLUMN A

**Total This Period** 

#### III. Net Contributions/ Operating Expenditures

33.	Total Contributions (other than loans)
	(from Line 11(d), page 3)
34.	Total Contribution Refunds
	(from Line 28(d))
35.	Net Contributions (other than loans)
	(subtract Line 34 from Line 33)
36.	Total Federal Operating Expenditures
	(add Line 21(a)(i) and Line 21(b))
37.	Offsets to Operating Expenditures
	(from Line 15, page 3)
38.	Net Operating Expenditures

(subtract Line 37 from Line 36) .....

							0.00
1.1.1		7			-7		0.00
						1	0.00
		-7	1	1	-7-	1	0.00
							0.00
1.1.1.1		-			-		0.00
							6124.35
		-			-	Ì	
F	-	4			-7-	-	6124.35
		-1-			-1-	-	6124.35
	-		-	-	-	-	6124.35 0.00

185623.15				
100020.10	-7		7	 <u> </u>
0.00				
	-		-7	
185623.15				
	-		-7	
13845.99				
	-7		-7	
0.00				
	-7		-7	
13845.99				

- 21

.

COLUMN B

Calendar Year-to-Date

#### Page 5

SCHEDULE B (FEC Form 3X)	Use separate schedule(s)		FOR LINE	
ITEMIZED DISBURSEMENTS	for each	category of the Summary Page	(check only 21b 28a	y one) 22 23 26 27 28b 28c 29 30b
Any information copied from such Reports and State or for commercial purposes, other than using the na			d by any pers	on for the purpose of soliciting contributions
NAME OF COMMITTEE (In Full)				
	ES PAC			
Full Name (Last, First, Middle Initial)				
<sup>A.</sup> Chain Bridge Bank				Date of Disbursement
Mailing Address 1445A Laughlin Ave				10 / 29 / 2024
City McLean	State VA	Zip Code 22314		FEC Identification Number
Purpose of Disbursement		· · · · · · · · · · · · · · · · · · ·		С
Bank Fees				Transaction ID : SB21B.6286
Candidate Name			Category/	Amount of Each Disbursement this Period
Office Sought: House Disburse	ement For:		Туре	25.00
Senate	Primary	General		
State: District:	Other (spe	cify) ▼		Memo Item
Full Name (Last, First, Middle Initial)				
B. Chain Bridge Bank				Date of Disbursement
Mailing Address 1445A Laughlin Ave				10 30 Y Y Y Y Y 2024
City	State	Zip Code		FEC Identification Number
McLean Purpose of Disbursement	VA	22314		
Bank Fees				C
Candidate Name			Category/ Type	Transaction ID : SB21B.6287 Amount of Each Disbursement this Period
Office Sought: House Disburse	ement For:		.)po	25.00
Senate	Primary	General		
State: District:	Other (spe	cify)		Memo Item
Full Name (Last, First, Middle Initial)				Date of Disbursement
C. Political Consulting				
Mailing Address 21218 St Andrews Blvd. #704				
City	State	Zip Code		FEC Identification Number
Boca Raton Purpose of Disbursement	FL	33433		
Non-Federal Advertising				C
Candidate Name			Category/ Type	Transaction ID : SB21B.6288 Amount of Each Disbursement this Period
Office Sought: House Disburse	ement For:		.140	6000.00
Senate	Primary	General		
State: District:	Other (spe	cify) 🔻		Memo Item
SUBTOTAL of Disbursements This Page (optional)				6050.00
			F	6050.00
TOTAL This Period (last page this line number only	y)		····· ►	6050.00

### SCHEDULE E (FEC Form 3X) ITEMIZED INDEPENDENT EXPENDITURES

ITEMIZED INDEPENDENT EXPENDITURES				PAGE 44 OF 44 FOR LINE 24 OF FORM 3X
NAME OF COMMITTEE (In Full)				FEC IDENTIFICATION NUMBER V
COURAGEOUS CONSERVATIVES F	PAC			C C00587022
Check if 24-hour report 48-hour report	New rep	port Amends repo	ort filed on	
Full Name of Payee		Memo	Item Date	e of Public Distribution/Dissemination
American Campaign Services, LLC				10 / Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y
Mailing Address 5830 E 2nd St			Amo	
Ste 8			Am	
City	State	Zip Code		1000.00
Casper	WY	82609		nsaction ID : SE.6283 e of Disbursement or Obligation
Purpose of Expenditure Email Voter Contact		Category/ Type		10 / D D / Y Y Y Y 29 / 2024
Name of Federal Candidate:		Support	Office Sou	ght: House District: 00
TRUMP, DONALD J, , ,		Oppose	X Pres	ident Senate State:
Calendar Year-To-Date Per Election for Office Sought		2000.00	Disbursem	
Full Name of Payee	, ,	Memo		e of Public Distribution/Dissemination
			item but	
Mailing Address				
			Amo	ount
City	State	Zip Code	- F	
Oity	Olale	Zip Code		9 9 9
Purpose of Expenditure			Date	e of Disbursement or Obligation
		Category/ Type		M M / D D / Y Y Y Y
Name of Federal Candidate:		Support	Office Sou	ght: House District:
		Oppose	Pres	ident Senate State:
Calendar Year-To-Date			Disbursem	ent For: Primary General
Per Election for Office Sought	7 7			Other (specify)
(a) SUBTOTAL of Itemized Independent Expenditures				1000.00
(b) SUBTOTAL of Unitemized Independent Expenditur	'es			
(c) TOTAL Independent Expenditures				1000.00
Under penalty of perjury I certify that the independe with, or at the request or suggestion of, any candida party committee) any political party committee or its	te or authorize			
Dann Stalla			M M	
Denn, Stella, , , Signature		Date	9 11	26 2024
				FEC Schedule E (Form 3X) Rev. 05/2016
			Def	s' Appx. 60

	Image#	202501	30974	8394001
--	--------	--------	-------	---------

01/30/2025 15 : 54

PAGE 1 / 44

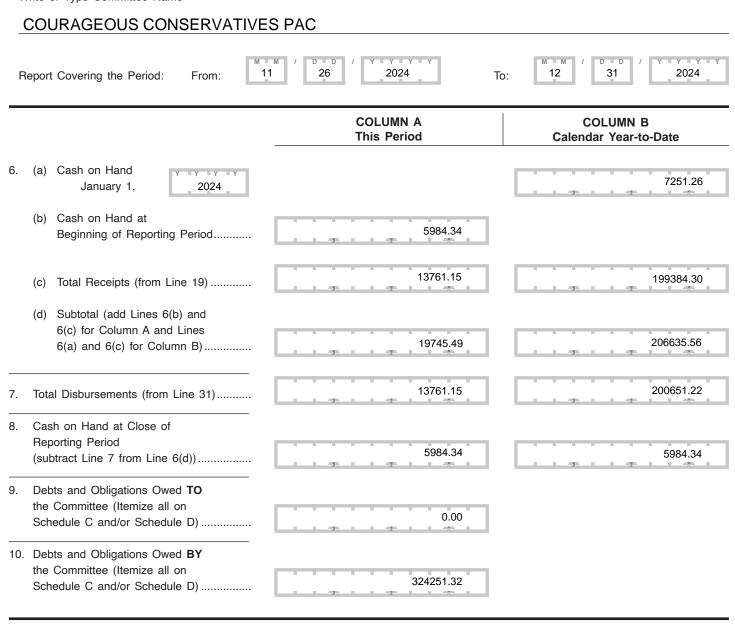
FEC FORM 3X	REPORT OF RECEIPTS AND DISBURSEMENTS For Other Than An Authorized Committee
1. NAME OF COMMITTEE (in f	TYPE OR PRINT ▼Example: If typing, type over the lines.12FE4M5
ADDRESS (number and Check if differ than previous reported. (AC 2. FEC IDENTIFICA	Ste 200-A         Fairfax         VA       22030         VA       22030         VA       2200-A         STATION NUMBER       CITY $\blacktriangle$ STATE $\bigstar$ ZIP CODE $\bigstar$
C C00587022	REPORT (N) OR (A)
July 15 Quarterly October 1 Quarterly January 3 Year-End July 31 M Report (N Year Only	Report       Due On:       Mar 20 (M3)       Jun 20 (M6)       Sep 20 (M9)       Dec 20 (M12)         Non-Election       Year Only)       Due On:       Apr 20 (M4)       Jul 20 (M7)       Oct 20 (M10)       X       Jan 31 (YE)         Report (Q1)       (c)       12-Day       Primary (12P)       General (12G)       Runoff (12R)         Report (Q2)       Report for the:       Convention (12C)       Special (12S)       in the State of         15       Election on       Min / Dub / Yuy Yuy       in the State of       State of         Mid-Year Non-election       30-Day       Occurrent (020)       Occurrent (020)       Occurrent (020)
<ol> <li>Covering Period</li> <li>I certify that I have example.</li> </ol>	amined this Report and to the best of my knowledge and belief it is true, correct and complete.
Type or Print Name of Signature of Treasurer NOTE: Submission of fa	
Office Use Only	FEC FORM 3X       Rev. 05/2016       Defs' Appx. 61

#### SUMMARY PAGE OF RECEIPTS AND DISBURSEMENTS

Page 2

Write or Type Committee Name

FEC Form 3X (Rev. 05/2016)



This committee has qualified as a multicandidate committee. (see FEC FORM 1M)

For further information, contact the Federal Election Commission at 800-424-9530 or visit www.fec.gov

Image#	202501	309748	394003
--------	--------	--------	--------

of Receipts

FEC Form 3X (Rev. 05/2016)

Write or Type Committee Name

## COURAGEOUS CONSERVATIVES PAC

Report Covering the Period: From:	26 / 2024 To:	12 31 Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y
I. Receipts	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
. Contributions (other than loans) From:		
(a) Individuals/Persons Other		
Than Political Committees	13761.15	24202.20
(i) Itemized (use Schedule A)	13/01.13	34383.30
(ii) Unitemized	0.00	1.00
(iii) TOTAL (add		
Lines 11(a)(i) and (ii)	13761.15	34384.30
(b) Political Party Committees	0.00	0.00
(c) Other Political Committees		
(such as PACs)	0.00	165000.00
(d) Total Contributions (add Lines		
11(a)(iii), (b), and (c)) (Carry		
Totals to Line 33, page 5)	13761.15	199384.30
Transfers From Affiliated/Other		
Party Committees	0.00	0.00
All Loans Received	0.00	0.00
	47. 47. 47.	
Loan Repayments Received	0.00	0.00
Offsets To Operating Expenditures	-72 -72 -72	
(Refunds, Rebates, etc.)		
(Carry Totals to Line 37, page 5)	0.00	0.00
Refunds of Contributions Made		
to Federal Candidates and Other		
Political Committees	0.00	0.00
Other Federal Receipts		
(Dividends, Interest, etc.)	0.00	0.00
Transfers from Non-Federal and Levin Funds		
(a) Non-Federal Account		
(from Schedule H3)	0.00	0.00
(b) Lovin Europa (from Schodula HE)	0.00	0.00
(b) Levin Funds (from Schedule H5)		
(c) Total Transfers (add 18(a) and 18(b))	0.00	0.00
Total Receipts (add Lines 11(d), 12, 13, 14, 15, 16, 17, and 18(c))▶	13761.15	199384.30
Total Federal Receipts		
(subtract Line 18(c) from Line 19)▶	13761.15	199384.30

Defs' Appx. 63

Page 3

L

## DETAILED SUMMARY PAGE

of Disbursements

FEC Form 3X (Rev. 05/2016)	of Disbursements	Page 4	
II. Disbursements	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date	
(a) Allocated Federal/Non-Federal		Galendar Tear-to-Date	
Activity (from Schedule H4) (i) Federal Share	0.00	0.00	
(ii) Non-Federal Share	0.00	0.00	
(b) Other Federal Operating			
Expenditures	13761.15	27607.14	
(c) Total Operating Expenditures (add 21(a)(i), (a)(ii), and (b))▶	13761.15	27607.14	
Transfers to Affiliated/Other Party			
Committees Contributions to	0.00	0.00	
Federal Candidates/Committees and Other Political Committees	0.00	10000.00	
Independent Expenditures		49. 49. 49.	
(use Schedule E) Coordinated Party Expenditures	0.00	163044.08	
(use Schedule F)	0.00		
		0.00	
Loan Repayments Made	0.00	0.00	
Loans Made	0.00	0.00	
Refunds of Contributions To: (a) Individuals/Persons Other			
Than Political Committees	0.00	0.00	
(b) Political Party Committees	0.00	0.00	
(c) Other Political Committees		4 4 4	
(such as PACs)	0.00	0.00	
(d) Total Contribution Refunds			
(add Lines 28(a), (b), and (c))	0.00	0.00	
Other Disbursements (Including			
Non-Federal Donations)	0.00	0.00	
Federal Election Activity (52 U.S.C. § 30101(20 (a) Allocated Federal Election Activity (from Schedule H6)	)))		
(i) Federal Share	0.00	0.00	
(ii) "Levin" Share		0.00	
(ii) Levin Share (b) Federal Election Activity Paid	0.00	0.00	
Entirely With Federal Funds	0.00	0.00	
(c) Total Federal Election Activity (add			
Lines 30(a)(i), 30(a)(ii) and 30(b))	0.00	0.00	
Total Disbursements (add Lines 21(c), 22, 23, 24, 25, 26, 27, 28(d), 29 and 30(c))	13761.15	200651.22	
Total Federal Disbursements			
(subtract Line 21(a)(ii) and Line 30(a)(ii)			
from Line 31)	13761.15	200651.22	

of Disbursements

COLUMN A

**Total This Period** 

FEC	Form	3X	(Rev.	05/2016)
		~	(1101.	00,2010)

#### **III. Net Contributions/ Operating Expenditures**

33.	Total Contributions (other than loans)
	(from Line 11(d), page 3)
34.	Total Contribution Refunds
	(from Line 28(d))
35.	Net Contributions (other than loans)
	(subtract Line 34 from Line 33)
36.	Total Federal Operating Expenditures
	(add Line 21(a)(i) and Line 21(b))
37.	Offsets to Operating Expenditures
	(from Line 15, page 3)
38.	Net Operating Expenditures

(subtract Line 37 from Line 36) .....

						13761.15
	-	7	1		-7	1 1 25 1
						0.00
	1	-	1	1	-7	
						13761.15
	1	-7	1	1	- 7	
			1			13761.15
				1.1		
				1	-	0.00
		-		Ì	-7-	0.00
F	-	-1-			-	0.00 13761.15

199384.30						
100001.00	7	1	1	7	1	
0.00						
0.00	-		1	-		la de
199384.30						
100004.00				-		
27607.14						
21001111	-7			7		
0.00						
0.00	7			7		
27607.14						
27007.14				-7-		

COLUMN B

Calendar Year-to-Date

#### Page 5

# SCHEDULE A (FEC Form 3X)

Use separate schedule(s)

FOR LINE NUMBER:

PAGE 6 OF

44

ITEMIZED RECEIPTS		Use separate schedule(s)	(check only one)					
		for each category of the Detailed Summary Page	X         11a         11b         11c         12           13         14         15         16         17					
			person for the purpose of soliciting contributions ee to solicit contributions from such committee.					
NAME OF COMMITTEE (In Full)								
	TIVES PAG	C						
Full Name of Individual (Last, First, Middle Ekstrom, Christopher, , ,	Initial) or Full C	rganization Name	Date of Receipt					
Mailing Address 25 Highland Park Village <u>Suite 100</u>			12 09 2024					
City Dallas	State TX	Zip Code 75205	Transaction ID : SA11AI.6290 Amount of Each Receipt this Period					
FEC ID number of contributing federal political committee.	С		2711.61					
Name of Employer (for Individual)		upation (for Individual)	Memo Item					
Self-employed	Inve	estor	In-kind - Non-Federal Digital Advertising					
Receipt For:	Aggregate	Year-to-Date ▼	-					
Other (specify) ▼		3333.76						
Full Name of Individual (Last, First, Middle <b>B.</b> Ekstrom, Christopher, , ,	Initial) or Full C	rganization Name	Date of Receipt					
Mailing Address 25 Highland Park Village Suite 100	1		12 / D D / Y Y Y Y Y 12 21 2024					
City	State	Zip Code	Transaction ID : SA11AI.6295					
Dallas	TX	75205	Amount of Each Receipt this Period					
FEC ID number of contributing federal political committee.	С		3374.01					
Name of Employer (for Individual)		upation (for Individual)	Memo Item					
Self-employed Receipt For:		estor	In-kind - In-kind - Non-Federal Digital Advertis					
Primary General	Aggregate	Year-to-Date ▼	-					
Other (specify)	_ L	6707.77						
Full Name of Individual (Last, First, Middle <b>C. Ekstrom, Christopher</b> , , ,	Initial) or Full C	rganization Name	Date of Receipt					
Mailing Address 25 Highland Park Village <u>Suite 100</u>			12 27 2024					
City Dallas	State TX	Zip Code 75205	Transaction ID : SA11AI.6291 Amount of Each Receipt this Period					
FEC ID number of contributing federal political committee.	С		7675.53					
Name of Employer (for Individual) Self-employed	Occ Inve	upation (for Individual) stor	In-kind - In-kind - Non-Federal Digital Advertis					
Receipt For: Primary General Other (specify)	Aggregate	Year-to-Date ▼ 14383.30	]					
SUBTOTAL of Receipts This Page (optional)			▶ 13761.15					
TOTAL This Period (last page this line numb	er only)		13761.15					

SCHEDULE B (FEC Form 3X)		Lisa saparata schodula(s)			FOR LINE NUMBER: PAGE 7 OF				: 44		
ITEMIZED DISBURSEMENTS		Use separate schedule(s) for each category of the			ck only one)				07		
		Summary Page		21b 28a	22 28b		23 28c	26		27 30b	
Any information and the LD I I D								_			
Any information copied from such Reports and State or for commercial purposes, other than using the na											
NAME OF COMMITTEE (In Full)											
COURAGEOUS CONSERVATIV	ES PAC										
Full Name (Last, First, Middle Initial)											
<sup>A.</sup> Ekstrom, Christopher, , ,					Date o	f Disk	ourser	ment			
Mailing Address 25 Highland Park Village					. M ■ M 12	/	09			024	1
Suite 100		1									
City Dallas	State TX	Zip Code 75205			FEC Id	lentific	cation	Numbe	ər		
Purpose of Disbursement		15205									
In-kind - Non-Federal Digital Advertising					С						
Candidate Name			Cata	n./				ID : SB		6 <b>294</b> t this Pe	riod
			Catego Type		Amoun	UTE	ach I	Sours	emen	ι uns Pe	100
	ement For:								2	2711.61	
Senate	Primary	General									
State: District:	Other (spe	ecny) ▼			Me	emo It	tem				
Full Name (Last, First, Middle Initial)											
<sup>3.</sup> Ekstrom, Christopher, , ,					Date o	f Dist	ourser	ment			
					M = M / D = D / Y = Y = Y						
Mailing Address 25 Highland Park Village Suite 100					12		21		2	024	
City Dallas	State TX	Zip Code 75205			FEC Id	lentific	cation	Numbe	ər		
Purpose of Disbursement		13205		_	С	-					
In-kind - In-kind - Non-Federal Digital Advertising							41.000	D - 00		200	
Candidate Name			Catego					D : SB2 Disburs		<b>296</b> t this Pe	riod
Office Sought: House Disburs	ement For:		Туре							3374.01	
Senate	Primary	General							_		
President	Other (spe						torr				
State: District:						emo It	iem				
Full Name (Last, First, Middle Initial)								_			
<sup>C.</sup> Ekstrom, Christopher, , ,					Date o						
Mailing Address 25 Highland Park Village Suite 100					м м 12	/	D 27			024	
City	State	Zip Code			FEC Id	lentific	cation	Numbe	ər		
Dallas Purpose of Disbursement	ТХ	75205								-	
In-kind - In-kind - Non-Federal Digital Advertising			· · · ·		С						
Candidate Name			Catego					ID : SB: Disburs		5 <b>293</b> t this Pe	riod
Office Sought: House Disburs	ement For:		Туре							7675.53	
Senate	Primary	General								1 485	
President	Other (spe	ecify) 🔻			Me	emo li	tem				
State: District:							1				
						-			1	3761.15	
SUBTOTAL of Disbursements This Page (optional)				• •			_	7		5701.15	_
TOTAL This Period (last page this line number onl	v)			•					1	3761.15	
	<i>,</i> ,		•••••	•				,		1.00	1.0

Defs Appx. 05/2016

CHEDULE C (FEC F	orm 3X)		_					
DANS				Use separate schedule for each category of the Detailed Summary Page	ne			
ME OF COMMITTEE (In Full)	)				Insaction ID : SC/10.4280			
COURAGEOUS CONS	,	S PAC		110				
LOAN SOURCE Full Name Ekstrom, Christopher, , ,	e (Last, First, Mi	ddle Initial)		N 🗌 Memo Iten	n Election: Primary General			
Mailing Address 25 Highland Suite 100	Park Village				Other (specify) ▼			
City		State	ZIP Code	9	╡			
Dallas		тх	75205					
Original Amount of Loan		Cumulative Pa	ayment To D	ate Ba	lance Outstanding at Close of This Peric			
	12000.00			0.00	12000.00			
TERMS			Data Dua	Interest De	to Coouradu			
Date Incurred	2015		Date Due	Interest Ra				
List All Endorsers or Guara	antors (if any) t	to Loan Source	)					
1. Full Name (Last, First, Mid	ddle Initial)			Name of Employer				
Mailing Address				Occupation				
City	State ZIP Code			Amount Guaranteed Outstanding:				
2. Full Name (Last, First, Mid	ddle Initial)			Name of Employer				
Mailing Address				Occupation				
City	State	ZIP Code		Amount Guaranteed Outstanding:				
3. Full Name (Last, First, Mid	ddle Initial)			Name of Employer				
Mailing Address				Occupation				
City	State	ZIP Code		Amount Guaranteed Outstanding:				
4. Full Name (Last, First, Mid	ddle Initial)			Name of Employer				
Mailing Address				Occupation				
City	State	ZIP Code		Amount Guaranteed Dutstanding:				
UBTOTALS This Period This	Page (optional)			······ •	12000.00			
OTALS This Period (last page	e in this line onl	y)		····· •				

Defset Appr 500 Ber 1	05/2016
-----------------------	---------

## :97 `A=G79 @@5 B9CIG`H9LH`F9 @5 H98 `HC`5 `F9DCFHžG7<98 I@9 `CF`=H9A=N5 H=CB

Form/Schedule: SC/10 Transaction ID : SC/10.4280

This loan has a due date of 'On Demand' and the interest rate is 0.00%

Form/Schedule: Transaction ID:

CHEDULE C (FEC	Form 3X)		I				
DANS				Use separate schedule(s) for each category of the Detailed Summary Page	PAGE 10 OF 44 FOR LINE 13 OF FORM 3X		
AME OF COMMITTEE (In Fi	111)				action ID : SC/10.4281		
		S PAC					
LOAN SOURCE Full Nan Ekstrom, Christopher, , ,	ne (Last, First, Mic	ddle Initial)		N 🗌 Memo Item	Election: Primary General		
Mailing Address 25 Highlar Suite 100	nd Park Village				Other (specify) ▼		
City		State	ZIP Cod	de			
Dallas		тх	7520	5			
Original Amount of Loan		Cumulative Pag	yment To	Date Baland	ce Outstanding at Close of This Perio		
	15000.00			0.00	15000.00		
TERMS Date Incurre	ed		Date Due	Interest Rate	Secured:		
M M / D D / Y 11 05		M M / D D	/ Y	Y I Y I Y	₩ (apr) Yes X No		
List All Endorsers or Gua	rantors (if anv) to	o Loan Source					
1. Full Name (Last, First, N				Name of Employer			
Mailing Address				Occupation			
City	State	ZIP Code		Amount Guaranteed Outstanding:			
2. Full Name (Last, First, N	Middle Initial)			Name of Employer			
Mailing Address				Occupation			
City	State	ZIP Code		Amount Guaranteed Outstanding:	7		
3. Full Name (Last, First, N	Middle Initial)			Name of Employer			
Mailing Address				Occupation			
City	State	ZIP Code		Amount Guaranteed Outstanding:			
4. Full Name (Last, First, N	Middle Initial)			Name of Employer			
Mailing Address				Occupation			
City	State	ZIP Code		Amount Guaranteed Outstanding:	т. т		
SUBTOTALS This Period This	s Page (optional).			······ •	15000.00		
OTALS This Period (last pag	ge in this line only	/)		······ •			



## :97 A = G79 @ G5 B9CIG H9LH F9 @ 5 H98 HC 5 F9DCFH 2G7 < 98 I @ CF + H9A = N5 H= CB

Form/Schedule: SC/10 Transaction ID : SC/10.4281

This loan has a due date of 'On Demand' and the interest rate is 0.00%

Form/Schedule: Transaction ID:

CHEDULE C (FEC	Form 3X)					
DANS			Use separate schedule(s for each category of the Detailed Summary Page	PAGE 12 OF 44 FOR LINE 13 OF FORM 3X		
AME OF COMMITTEE (In Fi					action ID : SC/10.4283	
	,	S PAC		Tans	20101112 - 00/10.4200	
LOAN SOURCE Full Nam Ekstrom, Christopher, , ,	ne (Last, First, Mi	ddle Initial)		N 🗌 Memo Item	Election: Primary General	
Mailing Address 25 Highlar	nd Park Village				Other (specify) ▼	
Suite 100 City	1	State	ZIP Cod	10		
		State	211 000			
Dallas		ТХ	75205			
Original Amount of Loan		Cumulative	Payment To I		nce Outstanding at Close of This Period	
	30000.00		7 7	0.00	30000.00	
TERMS Date Incurr 11 17	ed 2015	M M / D	Date Due	Interest Rate	Secured:	
List All Endorsers or Gua	arantors (if anv) t	o Loan Sour	ce			
1. Full Name (Last, First, I				Name of Employer		
				O second the second		
Mailing Address				Occupation		
City	State	ZIP Code		Amount Guaranteed Outstanding:		
2. Full Name (Last, First, I	Middle Initial)			Name of Employer		
Mailing Address				Occupation		
City	State	ZIP Code		Amount Guaranteed Outstanding:		
3. Full Name (Last, First, I	Middle Initial)			Name of Employer		
Mailing Address				Occupation		
City	State	ZIP Code		Amount Guaranteed Outstanding:		
4. Full Name (Last, First, I	Middle Initial)			Name of Employer		
Mailing Address				Occupation		
City	State	ZIP Code		Amount Guaranteed Outstanding:	<del>т </del>	
<b>SUBTOTALS</b> This Period Thi				<u></u>	30000.00	



## :97 `A=G79 @@5 B9CIG`H9LH`F9 @5 H98 `HC`5 `F9DCFHžG7<98 I@9 `CF`=H9A=N5 H=CB

Form/Schedule: SC/10 Transaction ID : SC/10.4283

This loan has a due date of 'On Demand' and the interest rate is 0.00%

Form/Schedule: Transaction ID:

-	orm 3X)						
DANS				Use separate schedul for each category of t Detailed Summary Pa	he		
AME OF COMMITTEE (In Full)				-	ansaction ID : SC/10.4404		
COURAGEOUS CONS		S PAC					
LOAN SOURCE Full Name Ekstrom, Christopher, , ,	(Last, First, Mi	ddle Initial)		N 🗌 Memo Iter	Primary		
Mailing Address 25 Highland I Suite 100	Park Village				General Other (specify) ▼		
City		State	ZIP Co	de			
Dallas		тх	7520	5			
Original Amount of Loan		Cumulative P	ayment To	Date Ba	alance Outstanding at Close of This Perio		
	6500.00			0.00	6500.00		
TERMS Date Incurred			Date Due	Interest Ra	ate Secured:		
M M / D D / Y	Y Y Y	M M / D	D / Y	YYYY			
01 05	2016			11/8/16 0.0	00 % (apr) Yes X No		
List All Endorsers or Guara		o Loan Source	9				
1. Full Name (Last, First, Mic	Idle Initial)			Name of Employer			
Mailing Address				Occupation			
City	State	ZIP Code		Amount Guaranteed Outstanding:	· · · · · · · · · · · ·		
2. Full Name (Last, First, Mic	Idle Initial)			Name of Employer			
Mailing Address				Occupation			
City	State	ZIP Code		Amount Guaranteed Outstanding:	· · · · · · · · · ·		
3. Full Name (Last, First, Mic	Idle Initial)			Name of Employer			
Mailing Address				Occupation			
City	City State ZIP Code				· · · · · · · · · · ·		
4. Full Name (Last, First, Mic	Idle Initial)			Outstanding:     Name of Employer			
Mailing Address				Occupation			
City	State	ZIP Code		Amount Guaranteed Outstanding:	<u>. т </u>		
UBTOTALS This Period This F							



## :97 `A=G79 @@5 B9CIG`H9LH`F9 @5 H98 `HC`5 `F9DCFHžG7<98 I@9 `CF`=H9A=N5 H=CB

Form/Schedule: SC/10 Transaction ID : SC/10.4404

This loan has a due date of 'On Demand' and the interest rate is 0.00%

Form/Schedule: Transaction ID:

CHEDULE C (FEC FO	orm 3X)							
DANS	,		Use separate schedul for each category of t Detailed Summary Pa	the				
			-	-				
AME OF COMMITTEE (In Full)	ERVATIVE	S PAC		l ra	ansaction ID : SC/10.4405			
LOAN SOURCE Full Name Ekstrom, Christopher, , ,	(Last, First, Mi	ddle Initial)		N 🗌 Memo Iter	m Election: Primary General			
Mailing Address 25 Highland F	Park Village				Other (specify) ▼			
Suite 100		State	ZIP Co	de	_			
Dallas Original Amount of Loan		TX	7520 Payment To	-	alance Outstanding at Close of This Period			
	20000.00	Cumulative	Payment to	0.00	20000.00			
TERMS Date Incurred			Date Due	Interest R	ate Secured:			
M M / D D / Y		M M / D	D / Y	YYYY				
01 22	2016			11/8/16 0.	.00 % (apr) Yes X N			
List All Endorsers or Guaran	ntors (if any) t	o Loan Sour	се					
1. Full Name (Last, First, Mid	dle Initial)			Name of Employer				
Mailing Address				Occupation				
City	State	ZIP Code		Amount Guaranteed Outstanding:				
2. Full Name (Last, First, Mid	dle Initial)			Name of Employer				
Mailing Address				Occupation				
City	State	ZIP Code		Amount Guaranteed Outstanding:	· · · · · · · · · · · ·			
3. Full Name (Last, First, Mid	dle Initial)			Name of Employer				
Mailing Address				Occupation				
City State ZIP Code				Amount Guaranteed Outstanding:				
4. Full Name (Last, First, Mid	dle Initial)			Name of Employer				
Mailing Address				Occupation				
City	State	ZIP Code		Amount Guaranteed Outstanding:	· · · · · · · · · · ·			
UBTOTALS This Period This F				i	20000.00			



CHEDULE C (FEC F	orm 3X)		r				
OANS				Use separate schedu for each category of Detailed Summary Pa	the		
AME OF COMMITTEE (In Full)	<u> </u>			Transaction ID : SC/10.4406			
COURAGEOUS CONS		S PAC					
LOAN SOURCE Full Name Ekstrom, Christopher, , ,	(Last, First, Mi	ddle Initial)		N 🗌 Memo Ite	Primary		
Mailing Address 25 Highland Suite 100	Park Village				General Other (specify) ▼		
City		State	ZIP Coc	le			
Dallas		ТΧ	75205	5			
Original Amount of Loan		Cumulative Payment To [		Date B	alance Outstanding at Close of This Perio		
	8000.00			0.00	8000.00		
TERMS Date Incurred			Date Due	Interest R	ate Secured:		
01 / Y	2016	M M / D		1/8/16 0.	.00 % (apr) Yes 🕅 No		
List All Endorsers or Guara	intors (if any) t	o Loan Sourc	ce				
1. Full Name (Last, First, Mid				Name of Employer			
Mailing Address				Occupation			
City	State	ZIP Code		Amount Guaranteed Outstanding:	· · · · · · · · · ·		
2. Full Name (Last, First, Mid	ddle Initial)			Name of Employer			
Mailing Address				Occupation			
City	State	ZIP Code		Amount Guaranteed Outstanding:			
3. Full Name (Last, First, Mid	ddle Initial)	ł		Name of Employer			
Mailing Address				Occupation			
City	State	ZIP Code		Amount Guaranteed Outstanding:			
4. Full Name (Last, First, Mid	ddle Initial)			Name of Employer			
Mailing Address				Occupation			
City	State	ZIP Code		Amount Guaranteed Outstanding:	· · · · · · · · · · ·		
UBTOTALS This Period This					8000.00		



	orm 3X)					
DANS				Use separate schedule( for each category of the Detailed Summary Page		
AME OF COMMITTEE (In Full)					action ID : SC/10.4500	
		S PAC		Tan	Saction 12 . 30/10.4300	
LOAN SOURCE Full Name Ekstrom, Christopher, , ,	(Last, First, Mi	ddle Initial)		N 🗌 Memo Item	Election: Primary General	
Mailing Address 25 Highland	Park Village				Other (specify) ▼	
Suite 100					-	
City		State	ZIP Cod	le		
Dallas		ТΧ	75205	5		
Original Amount of Loan		Cumulative F	ayment To I	Date Bala	nce Outstanding at Close of This Period	
	8500.00			0.00	8500.00	
TERMS Date Incurred			Date Due	Interest Rate	e Secured:	
02 / D D / Y 03 / Y	2016	M M / D	D / Y	Y Y Y Y 0.00	% (apr) Yes 🗙 No	
List All Endorsers or Guara	intors (if any) t	o Loan Sourc	e			
1. Full Name (Last, First, Mic				Name of Employer		
Mailing Address				Occupation		
City	State	ZIP Code		Amount Guaranteed Outstanding:		
2. Full Name (Last, First, Mid	ddle Initial)			Name of Employer		
Mailing Address				Occupation		
City	State	ZIP Code		Amount Guaranteed Outstanding:		
3. Full Name (Last, First, Mid	ddle Initial)			Name of Employer		
Mailing Address				Occupation		
City	State	ZIP Code		Amount Guaranteed Outstanding:		
4. Full Name (Last, First, Middle Initial)				Name of Employer		
Mailing Address				Occupation		
City	State	ZIP Code		Amount Guaranteed Outstanding:	т. г. г. г. г. г. 	



## :97 `A=G79 @@5 B9CIG`H9LH`F9 @5 H98 `HC`5 `F9DCFHžG7<98 I@9 `CF`=H9A=N5 H=CB

Form/Schedule: SC/10 Transaction ID : SC/10.4500

This loan has a due date of 'On Demand' and the interest rate is 0.00%

Form/Schedule: Transaction ID:

CHEDULE C (FEC F	orm 3X)						
DANS				Use separate schedule for each category of th Detailed Summary Pag			
AME OF COMMITTEE (In Full)	)			Transaction ID : SC/10.4505			
COURAGEOUS CONS		S PAC					
LOAN SOURCE Full Name Ekstrom, Christopher, , ,	(Last, First, Mi	ddle Initial)		N 🗌 Memo Item	Primary		
Mailing Address 25 Highland Suite 100	Park Village				General Other (specify) ▼		
City		State	ZIP Coo	le			
Dallas		ТХ	75205	5			
Original Amount of Loan		Cumulative F	Payment To I	Date Bal	ance Outstanding at Close of This Period		
	30000.00			0.00	30000.00		
TERMS Date Incurred			Date Due	Interest Rat	te Secured:		
	2016	M M / D		Y Y Y Y 0.0			
					0 <b>%</b> (apr) Yes X No		
List All Endorsers or Guara		o Loan Sourc	e	Nome of Employeer			
1. Full Name (Last, First, Mic	ddle Initial)			Name of Employer			
Mailing Address				Occupation			
City	State	ZIP Code		Amount Guaranteed Outstanding:	· · · · · · · · · ·		
2. Full Name (Last, First, Mid	ddle Initial)			Name of Employer			
Mailing Address				Occupation			
City	State	ZIP Code		Amount Guaranteed Outstanding:	· · · · · · · · · ·		
3. Full Name (Last, First, Mic	ddle Initial)			Name of Employer			
Mailing Address				Occupation			
City	State	ZIP Code		Amount Guaranteed Outstanding:	· · · · · · · · · · ·		
4. Full Name (Last, First, Mid	ddle Initial)	·		Name of Employer			
Mailing Address				Occupation			
City	State	ZIP Code		Amount Guaranteed Outstanding:			
CUBTOTALS This Period This I				L	30000.00		



## :97 `A=G79 @@5 B9CIG`H9LH`F9 @5 H98 `HC`5 `F9DCFHžG7<98 I@9 `CF`=H9A=N5 H=CB

Form/Schedule: SC/10 Transaction ID : SC/10.4505

This loan has a due date of 'On Demand' and the interest rate is 0.00%

Form/Schedule: Transaction ID:

CHEDULE C (FEC F	orm 3X)		_				
OANS				Use separate sched for each category of Detailed Summary P	the	PAGE 22	OF 44 13 OF FORM 3X
AME OF COMMITTEE (In Full)	1			Transaction ID : SC/10.4510			
		S PAC					
LOAN SOURCE Full Name Ekstrom, Christopher, , ,	(Last, First, Mid	ddle Initial)		N 🗌 Memo Ite	em Ele	ection: Primary	
Mailing Address 25 Highland Suite 100	Park Village					General Other (specify	) 🔻
City		State	ZIP Cod	le			
Dallas		тх	75205	5			
Original Amount of Loan		Cumulative Pa	ayment To I	Date E	Balance	Outstanding at	Close of This Peri
	17000.00			0.00			17000.00
TERMS Date Incurred		,	Date Due	Interest F	Pata	, , ,	Secured:
M M / D D / Y		M M / D I		YYYY			
02 22	2016				0.00	<b>%</b> (apr)	Yes X N
List All Endorsers or Guara	ntors (if any) to	o Loan Source					
1. Full Name (Last, First, Mic	ddle Initial)			Name of Employer			
Mailing Address				Occupation			
City	State	ZIP Code		Amount Guaranteed Outstanding:	,		
2. Full Name (Last, First, Mic	ddle Initial)			Name of Employer			
Mailing Address				Occupation			
City	State	ZIP Code		Amount Guaranteed Outstanding:			
3. Full Name (Last, First, Mic	ddle Initial)			Name of Employer			
Mailing Address				Occupation			
City	State	ZIP Code		Amount Guaranteed Outstanding:			
4. Full Name (Last, First, Mic	ddle Initial)			Name of Employer			
Mailing Address				Occupation			
City	State	ZIP Code		Amount Guaranteed Outstanding:			
SUBTOTALS This Period This I							17000.00



## :97 `A=G79 @@5 B9CIG`H9LH`F9 @5 H98 `HC`5 `F9DCFHžG7<98 I@9 `CF`=H9A=N5 H=CB

Form/Schedule: SC/10 Transaction ID : SC/10.4510

This loan has a due date of 'On Demand' and the interest rate is 0.00%

Form/Schedule: Transaction ID:

CHEDULE C (FEC I	Form 3X)				
DANS				Use separate schedule for each category of the Detailed Summary Pag	e
					e FOR LINE 13 OF FORM 3X
AME OF COMMITTEE (In Fu	,	SPAC		Irar	1Saction ID : SC/10.4555
1				<b>N</b>	Floation
LOAN SOURCE Full Nam Ekstrom, Christopher, , ,	e (Last, First, Mi	ddle Initial)		N 🗌 Memo Item	Election: Primary General
Mailing Address 25 Highland Suite 100	d Park Village				Other (specify) ▼
City		State	ZIP Coo	le	1
Dallas		ТХ	75205	5	
Original Amount of Loan		Cumulative I	Payment To I	Date Bala	ance Outstanding at Close of This Period
	10000.00		, ,	0.00	10000.00
TERMS			Data Dua	Interest Dat	c. Coouvedu
Date Incurre		M M / D	Date Due	Interest Rat	
03 18	2016				% (apr) Yes X No
List All Endorsers or Guar	rantors (if any) t	o Loan Sourd	се		
1. Full Name (Last, First, M	liddle Initial)			Name of Employer	
Mailing Address				Occupation	
City	State	ZIP Code		Amount Guaranteed Outstanding:	· · · · · · · · · ·
2. Full Name (Last, First, M	liddle Initial)			Name of Employer	
Mailing Address				Occupation	
City	State	ZIP Code		Amount Guaranteed Outstanding:	
3. Full Name (Last, First, M	liddle Initial)			Name of Employer	
Mailing Address				Occupation	
City	State	ZIP Code		Amount Guaranteed Outstanding:	· · · · · · · · · ·
4. Full Name (Last, First, M	liddle Initial)			Name of Employer	
Mailing Address				Occupation	
City	State	ZIP Code		Amount Guaranteed Outstanding:	
<b>CUBTOTALS</b> This Period This					



## :97 `A=G79 @@5 B9CIG`H9LH`F9 @5 H98 `HC`5 `F9DCFHžG7<98 I@9 `CF`=H9A=N5 H=CB

Form/Schedule: SC/10 Transaction ID : SC/10.4555

This loan has a due date of 'On Demand' and the interest rate is 0.00%

Form/Schedule: Transaction ID:

CHEDULE C (FEC F	orm 3X)						
DANS				Use separate schedule for each category of th Detailed Summary Pag	FOR LINE 13 OF FORM 3X		
AME OF COMMITTEE (In Full	)			Transaction ID : SC/10.4892			
COURAGEOUS CONS		S PAC					
LOAN SOURCE Full Name Ekstrom, Christopher, , ,	e (Last, First, Mi	ddle Initial)		N 🗌 Memo Item	Primary		
Mailing Address 25 Highland Suite 100	Park Village				General Other (specify) ▼		
City		State	ZIP Coo	le	-		
Dallas		тх	75205	5			
Original Amount of Loan		Cumulative	Payment To	Date Bal	ance Outstanding at Close of This Period		
	4567.89		· · · · ·	0.00	4567.89		
TERMS Date Incurred			Date Due	Interest Rat	e Secured:		
	2016	M M / D		Y Y Y Y 0.0			
List All Endorsers or Guara	antors (if any) t	o Loan Sour	ce				
1. Full Name (Last, First, Mi	ddle Initial)			Name of Employer			
Mailing Address				Occupation			
City	State	ZIP Code		Amount Guaranteed Outstanding:	· · · · · · · · · · ·		
2. Full Name (Last, First, Mi	ddle Initial)			Name of Employer			
Mailing Address				Occupation			
City	State	ZIP Code		Amount Guaranteed Outstanding:	· · · · · · · · · · ·		
3. Full Name (Last, First, Mi	ddle Initial)			Name of Employer			
Mailing Address				Occupation			
City	State	ZIP Code		Amount Guaranteed Outstanding:	· · · · · · · · · ·		
4. Full Name (Last, First, Mi	ddle Initial)			Name of Employer			
Mailing Address				Occupation			
City	State	ZIP Code		Amount Guaranteed Outstanding:			
SUBTOTALS This Period This				L	4567.89		



## :97 A = G79 @ G5 B9CIG H9LH F9 @ 5 H98 HC 5 F9DCFH 2G7 < 98 I @ CF + H9A = N5 H= CB

Form/Schedule: SC/10 Transaction ID : SC/10.4892

This loan has a due date of 'On Demand' and the interest rate is 0.00%

Form/Schedule: Transaction ID:

CHEDULE C (FEC F	-orm 3X)		1		e(s) PAGE 28 OF 44		
DANS				Use separate schedule for each category of the Detailed Summary Page	he		
AME OF COMMITTEE (In Ful	II)			Transaction ID : SC/10.4891			
COURAGEOUS CON		S PAC					
LOAN SOURCE Full Name Ekstrom, Christopher, , ,	e (Last, First, Mic	ddle Initial)		N 🗌 Memo Iter	Primary		
Mailing Address 25 Highland Suite 100	d Park Village				General Other (specify) ▼		
City		State	ZIP Coo	de	-		
Dallas		ТХ	7520	5			
Original Amount of Loan		Cumulative I	Payment To	Date Ba	lance Outstanding at Close of This Period		
	6000.00			0.00	6000.00		
TERMS Date Incurred	d		Date Due	Interest Ra	te Secured:		
	2016	M M / D					
					00 % (apr) Yes X No		
List All Endorsers or Guar		o Loan Sourd	ce	Name of Employer			
1. Full Name (Last, First, M	iiddie initial)			Name of Employer			
Mailing Address				Occupation			
City	State	ZIP Code		Amount Guaranteed Outstanding:			
2. Full Name (Last, First, M	liddle Initial)			Name of Employer			
Mailing Address				Occupation			
City	State	ZIP Code		Amount Guaranteed Outstanding:	· · · · · · · · · · · · · · · · · · ·		
3. Full Name (Last, First, M	liddle Initial)			Name of Employer			
Mailing Address				Occupation			
City	State	ZIP Code		Amount Guaranteed Outstanding:			
4. Full Name (Last, First, M	liddle Initial)	·		Name of Employer			
Mailing Address				Occupation			
City	State	ZIP Code		Amount Guaranteed Outstanding:	· · · · · · · · · · · · · · · · · · ·		
SUBTOTALS This Period This				L	6000.00		



## :97 `A=G79 @@5 B9CIG`H9LH`F9 @5 H98 `HC`5 `F9DCFHžG7<98 I@9 `CF`=H9A=N5 H=CB

Form/Schedule: SC/10 Transaction ID : SC/10.4891

This loan has a due date of 'On Demand' and the interest rate is 0.00%

Form/Schedule: Transaction ID:

CHEDULE C (FEC Fo	orm 3X)		Г		le(s) PAGE 30 OF 44			
DANS				Use separate schedu for each category of	·/			
				Detailed Summary Pa	•			
AME OF COMMITTEE (In Full)	ERVATIVE	S PAC		Ir	ansaction ID : SC/10.4918			
LOAN SOURCE Full Name ( Ekstrom, Christopher, , ,	(Last, First, Mi	ddle Initial)		N ☐ Memo Ite	Primary			
Mailing Address 25 Highland P Suite 100	ark Village				General Other (specify) ▼			
City		State	ZIP Cod	e				
Dallas		тх	75205					
Original Amount of Loan		Cumulative Pa	ayment To E	Date Ba	alance Outstanding at Close of This Perio			
	10013.46	· · · · ·		0.00	10013.46			
TERMS Date Incurred			Date Due	Interest R	ate Secured:			
M M / D D / Y	2016	M M / D I	D / Y	YYYY	00 % (apr) Yes X No			
List All Endorsers or Guaran	ntors (if any) t	o Loan Source	;					
1. Full Name (Last, First, Mide	dle Initial)			Name of Employer				
Mailing Address				Occupation				
City	State	ZIP Code		Amount Guaranteed Outstanding:				
2. Full Name (Last, First, Mide	dle Initial)			Name of Employer				
Mailing Address				Occupation				
City	State	ZIP Code		Amount Guaranteed Outstanding:	· · · · · · · · · ·			
3. Full Name (Last, First, Mide	dle Initial)			Name of Employer				
Mailing Address				Occupation				
City	State	ZIP Code		Amount Guaranteed Outstanding:	· · · · · · · · · ·			
4. Full Name (Last, First, Mide	dle Initial)			Name of Employer				
Mailing Address				Occupation				
City	State	ZIP Code		Amount Guaranteed Outstanding:	· · · · · · · · · · ·			
UBTOTALS This Period This P	age (optional)			····· •	10013.46			
OTALS This Period (last page i	in this line only	y)		····· •				



CHEDULE C (FEC DANS	Form 3X)			Use separate schedu	le(s) PAGE 31 OF 44			
JANS				for each category of t Detailed Summary Pa	FOR LINE 13 OF FORM 3X			
AME OF COMMITTEE (In Fi	ull)			Transaction ID : SC/10.4934				
COURAGEOUS CON		S PAC						
LOAN SOURCE Full Nan Ekstrom, Christopher, , ,	ne (Last, First, Mid	dle Initial)		N 🗌 Memo Ite	m Election: Primary General			
Mailing Address 25 Highlar Suite 100	nd Park Village				Other (specify) ▼			
City		State	ZIP Coc	le				
Dallas		ТХ	75205	5				
Original Amount of Loan	I	Cumulative P	ayment To I	Date Ba	alance Outstanding at Close of This Perio			
	9500.00			0.00	9500.00			
TERMS	a d		Data Dua		ata Casuradu			
Date Incurre	ea Y Y Y Y N	I M / D		Interest R				
09 19	2016		12/	/31/2020 0.	00 (apr) Yes X No			
List All Endorsers or Gua		Loan Source	e					
1. Full Name (Last, First, I	Middle Initial)			Name of Employer				
Mailing Address				Occupation				
City	State	ZIP Code		Amount Guaranteed Outstanding:	· · · · · · · · · · ·			
2. Full Name (Last, First, I	Middle Initial)	-		Name of Employer				
Mailing Address				Occupation				
City	State	ZIP Code		Amount Guaranteed Outstanding:	· · · · · · · · · ·			
3. Full Name (Last, First, I	Middle Initial)			Name of Employer				
Mailing Address				Occupation				
City	State	ZIP Code		Amount Guaranteed Outstanding:	· · · · · · · · · · ·			
4. Full Name (Last, First, I	Middle Initial)			Name of Employer				
Mailing Address				Occupation				
City	State	ZIP Code		Amount Guaranteed Outstanding:	· · · · · · · · · ·			
SUBTOTALS This Period Thi				······	9500.00			



CHEDULE C (FEC F	orm 3X)							
DANS	,			Use separate sched for each category of Detailed Summary F	f the	PAGE 32	OF 44	M 3X
AME OF COMMITTEE (In Full)	)			Detailed Summary Page FOR LINE 13 OF FORM 3X Transaction ID : SC/10.4948				
	·	S PAC						
LOAN SOURCE Full Name Ekstrom, Christopher, , ,	(Last, First, Mi	ddle Initial)		N ☐ Memo It	tem El	lection: Primary		
Mailing Address 25 Highland Suite 100	Park Village					General Other (specify	) ▼	
City		State	ZIP Cod	e				
Dallas		ТХ	75205	5				
Original Amount of Loan		Cumulative F	Payment To [	Date	Balance	Outstanding at	Close of Th	is Period
	15420.00			0.00			15420.	00
TERMS Date Incurred			Date Due	Interest	Rate		Secured:	
		M M / D	D / Y	YYYY	0.00	<b>%</b> (apr)		X No
	(:f					<b>70</b> (upi)		
List All Endorsers or Guara 1. Full Name (Last, First, Mid		o Loan Sourc		Name of Employer				
Mailing Address				Occupation				
City	State	ZIP Code		Amount Guaranteed Outstanding:		<del>у</del> у		
2. Full Name (Last, First, Mic	ddle Initial)			Name of Employer				
Mailing Address				Occupation				
City	State	ZIP Code		Amount Guaranteed Outstanding:				
3. Full Name (Last, First, Mic	ddle Initial)			Name of Employer				
Mailing Address				Occupation				
City	State	ZIP Code		Amount Guaranteed Outstanding:		т т		
4. Full Name (Last, First, Mic	ddle Initial)			Name of Employer				
Mailing Address				Occupation				
City	State	ZIP Code		Amount Guaranteed Outstanding:			1 1 1	
SUBTOTALS This Period This I							15420.	.00



CHEDULE C (FEC F	orm 3X)						
DANS				Use separate schedule(s) for each category of the Detailed Summary Page		FOR LINE 13 OF FORM 3X	
AME OF COMMITTEE (In Ful	1)					tion ID : SC/10.4	
		S PAC			TTATISAU		+990
LOAN SOURCE Full Name	e (Last, First, Mi	ddle Initial)		N 🗌 Mem	o Item E	lection: Primary	
Ekstrom, Christopher, , ,						General	
Mailing Address 25 Highland Suite 100	l Park Village					Other (specify	/) 🔻
City		State	ZIP Coo	le			
Dallas		ТХ	75205	5			
Original Amount of Loan		Cumulative F	Payment To I	Date	Balance	Outstanding at	Close of This Period
	12500.00			0.00			12500.00
TERMS Date Incurred	ł		Date Due	Intere	est Rate		Secured:
08 07	2017	M M / D		/31/2021	0.00	9/ ()	Yes 🗙 No
					1.14	<b>%</b> (apr)	
List All Endorsers or Guara 1. Full Name (Last, First, M		o Loan Sourc	e I	Name of Employer			
Mailing Address				Occupation			
City	State	ZIP Code		Amount Guaranteed Outstanding:			
2. Full Name (Last, First, M	iddle Initial)			Name of Employer			
Mailing Address				Occupation			
City	State	ZIP Code		Amount Guaranteed Outstanding:			· · · · ·
3. Full Name (Last, First, M	iddle Initial)			Name of Employer			
Mailing Address				Occupation			
City	State	ZIP Code		Amount Guaranteed Outstanding:			
4. Full Name (Last, First, M	iddle Initial)			Name of Employer			
Mailing Address				Occupation			
City	State	ZIP Code		Amount Guaranteed Outstanding:			
SUBTOTALS This Period This							12500.00



CHEDULE C (FEC F	orm 3X)						
DANS	<b>,</b>			Use separate sched for each category of Detailed Summary F	the	PAGE 34 OF 44 FOR LINE 13 OF FORM 3X	
AME OF COMMITTEE (In Full)	1			Transaction ID : SC/10.4996			
		S PAC			ransaction ib .	00/10.4330	
LOAN SOURCE Full Name Ekstrom, Christopher, , ,	(Last, First, Mic	ddle Initial)		N ☐ Memo It	em Election: Prima Gener	<b>,</b>	
Mailing Address 25 Highland Suite 100	Park Village					(specify) ▼	
City		State	ZIP Cod	de			
Dallas		тх	7520	5			
Original Amount of Loan		Cumulative P		-	Balance Outstan	nding at Close of This Period	
	300.00			0.00		300.00	
TERMS Date Incurred			Date Due	Interest	Rate	Secured:	
M M / D D / Y	Y Y Y	M M / D	D / Y	YYYY			
08 31	2017		12	/31/2021	%	(apr) Yes X No	
List All Endorsers or Guara		o Loan Source	e				
1. Full Name (Last, First, Mic	ddle Initial)			Name of Employer			
Mailing Address				Occupation			
City	State	ZIP Code		Amount Guaranteed Outstanding:			
2. Full Name (Last, First, Mid	ddle Initial)			Name of Employer			
Mailing Address				Occupation			
City	State	ZIP Code		Amount Guaranteed Outstanding:			
3. Full Name (Last, First, Mic	ddle Initial)			Name of Employer			
Mailing Address				Occupation			
City	State	ZIP Code		Amount Guaranteed Outstanding:			
4. Full Name (Last, First, Mic	ddle Initial)			Name of Employer			
Mailing Address				Occupation			
City	State	ZIP Code		Amount Guaranteed Outstanding:			
GUBTOTALS This Period This I						300.00	



CHEDULE C (FEC	Form 3X)		_				
OANS				Use separate s for each catego Detailed Summ	ory of the	PAGE 35	OF 44
				Detailed Summ		Ction ID : SC/10.5	13 OF FORM 3X
AME OF COMMITTEE (In Fu	,	S PAC			Transad	ction ID : 5C/10.5	0028
LOAN SOURCE Full Nam	ne (Last First Mi	dle Initial)		N Mer	mo Item E	lection:	
Ekstrom, Christopher, , ,	Ekstrom, Christopher, , ,				Primary General		
Mailing Address 25 Highlan Suite 100	d Park Village					Other (specify	() <b>V</b>
City		State	ZIP Cod	е	-		
Dallas		ТХ	75205	;			
Original Amount of Loan		Cumulative P	ayment To E	Date	Balance	e Outstanding at	Close of This Perio
	5014.97			0.00			5014.97
TERMS Date Incurre	d		Date Due	Inte	rest Rate		Secured:
M M / D D / Y 09 01	2017	M M / D		31/2017	0.00	<b>%</b> (apr)	Yes 🗙 No
						<b>70</b> (apr)	
List All Endorsers or Guar		o Loan Source		Name of Employe	~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~		
1. Full Name (Last, First, M	Alddie Initial)			Name of Employe	-I		
Mailing Address				Occupation			
City	State	ZIP Code		Amount Guaranteed Outstanding:			
2. Full Name (Last, First, M	Aiddle Initial)			Name of Employe	ər		
Mailing Address				Occupation			
City	State	ZIP Code		Amount Guaranteed Outstanding:			
3. Full Name (Last, First, M	liddle Initial)			Name of Employe	ər		
Mailing Address				Occupation			
City	State	ZIP Code		Amount Guaranteed Outstanding:			
4. Full Name (Last, First, M	liddle Initial)			Name of Employe	ər		
Mailing Address				Occupation			
City	State	ZIP Code		Amount Guaranteed Outstanding:		<del>,</del>	
SUBTOTALS This Period This							5014.97



CHEDULE C (FEC I	Form 3X)		r			44
DANS			for each	arate schedule(s) category of the	PAGE 36	OF 44
			Detailed	Summary Page	FOR LINE 13 OF FORM 3X	
AME OF COMMITTEE (In Fu	,	S PAC		Transac	ction ID : SC/10.	5068
LOAN SOURCE Full Nam Ekstrom, Christopher, , ,	ie (Last, First, Mi	ddle Initial)	N	Memo Item	Election:	
Mailing Address 25 Highland Suite 100	d Park Village				General Other (specify	/) ▼
City		State	ZIP Code			
Dallas		тх	75205			
Original Amount of Loan			ayment To Date	Balance	e Outstanding at	Close of This Perio
	11000.00			.00		11000.00
TERMS Date Incurre	d		Date Due	Interest Rate		Secured:
10 / 16 / Y	2017	M = M / D =		0.00	<b>%</b> (apr)	Yes X N
List All Endorsers or Guar	rantors (if any) t	o Loan Source	)			
1. Full Name (Last, First, N	Iiddle Initial)		Name of E	Employer		
Mailing Address			Occupation	n		
City	State	ZIP Code	Amount Guarantee Outstandir			
2. Full Name (Last, First, M	Aiddle Initial)		Name of E	-		
Mailing Address			Occupation	n		
City	State	ZIP Code	Amount Guarantee Outstandir			
3. Full Name (Last, First, N	Aiddle Initial)		Name of E	Employer		
Mailing Address			Occupation	n		
City	State	ZIP Code	Amount Guarantee Outstandir			
4. Full Name (Last, First, M	Aiddle Initial)		Name of E	Employer		
Mailing Address			Occupation	n		
City	State	ZIP Code	Amount Guarantee Outstandir		р. I. Эр. I.	
UBTOTALS This Period This	Page (optional)			···· •		11000.00
OTALS This Period (last pag	ge in this line only	y)		···· • [.	. ,	

CHEDULE C (FEC	Form 3X)							
DANS			[	Use separate schedu for each category of	the	PAGE 37		
				Detailed Summary Page				
AME OF COMMITTEE (In COURAGEOUS CO	,	S PAC		т	ransacti	on ID : SC/10	.5091	
LOAN SOURCE Full Name (Last, First, Middle Initial) Ekstrom, Christopher, , ,				N 🗌 Memo Ite	em Ele	Election: Primary		
Mailing Address 25 High						General Other (speci	fy) ▼	
City		State	ZIP Cod	e	$\dashv$ _			
Dallas		ТХ	75205	i				
Original Amount of Loar	1	Cumulative Pa			Balance (	Outstanding a	t Close of TI	nis Perio
	750.00			0.00		-		.00
TERMS	weed	r	Data Dua	Interest [	) oto		Coourod	
Date Incu 11 / 10 /	2017			31/2022	1ate ).00	<b>%</b> (apr)	Secured	
List All Endorsers or G	uarantors (if any) t	o Loan Source	I					
1. Full Name (Last, First	, Middle Initial)			Name of Employer				
Mailing Address				Occupation				
City	State	ZIP Code		Amount Guaranteed Outstanding:				
2. Full Name (Last, First, Middle Initial)				Name of Employer				
Mailing Address				Occupation				
City	State	ZIP Code		Amount Guaranteed Outstanding:				
3. Full Name (Last, First	, Middle Initial)			Name of Employer				
Mailing Address				Occupation				
City	State	ZIP Code		Amount Guaranteed Outstanding:				
4. Full Name (Last, First, Middle Initial)				Name of Employer				
Mailing Address				Occupation				
City	State	ZIP Code		Amount Guaranteed Outstanding:				
OTALS This Period T							, 750	0.00
Carry outstanding balance	only to LINE 3, Sch	nedule D, for thi	is line. If n	o Schedule D, carry f	forward	to appropriat	e line of Su	immary



CHEDULE C (FEC For	rm 3X)						
OANS			Use separate schedule( for each category of the	· · · · · · · · · · · · · · · · · · ·			
				Detailed Summary Page			
AME OF COMMITTEE (In Full) COURAGEOUS CONSE	RVATIVE	S PAC		Tran	saction ID : SC/10.5104		
LOAN SOURCE Full Name (Last, First, Middle Initial) Ekstrom, Christopher, , ,				N 🗌 Memo Item	Election:		
Mailing Address 25 Highland Pa Suite 100	ark Village				General Other (specify) ▼		
City		State	ZIP Cod	le	·		
Dallas		тх	7520	5			
Original Amount of Loan		Cumulative	Payment To	Date Bala	nce Outstanding at Close of This Period		
2	2185.00		, , , ,	0.00	22185.00		
TERMS Date Incurred			Date Due	Interest Rate	e Secured:		
	017	M M / D		/31/2021 0.00	₩ (apr) Yes X No		
List All Endorsers or Guarant	ors (if anv) t	o Loan Sour	се				
1. Full Name (Last, First, Midd				Name of Employer			
Mailing Address				Occupation			
City	City State ZIP Code			Amount Guaranteed Outstanding:			
2. Full Name (Last, First, Midd	le Initial)			Name of Employer			
Mailing Address				Occupation			
City	City State ZIP Code			Amount Guaranteed Outstanding:			
3. Full Name (Last, First, Midd	le Initial)			Name of Employer			
Mailing Address				Occupation			
City	State	ZIP Code		Amount Guaranteed Outstanding:			
4. Full Name (Last, First, Middle Initial)			Name of Employer				
Mailing Address				Occupation			
City	State	ZIP Code		Amount Guaranteed Outstanding:			
SUBTOTALS This Period This Pa					22185.00		



CHEDULE C (FEC Fo	orm 3X)						
OANS	- /			Use separate schedule(s) for each category of the Detailed Summary Page FOR LINE 13 OF FORM 3X			
AME OF COMMITTEE (In Full)				Transaction ID : SC/10.5102			
COURAGEOUS CONSE	ERVATIVE	S PAC					
LOAN SOURCE Full Name (Last, First, Middle Initial) Ekstrom, Christopher, , ,				N Memo Item Election:			
Mailing Address 25 Highland Pa	ark Village			Other (specify) ▼			
Suite 100		Otata		4			
City		State	ZIP Coo	de			
Dallas		ТХ	75205	15			
Original Amount of Loan		Cumulative I	Payment To I	Date Balance Outstanding at Close of This Per			
7 7	5000.00		<u> </u>	0.00 5000.00			
	2017	M M / D		2/31/2021 Interest Rate Secured:			
List All Endorsers or Guaran	tors (if any) t	o Loan Sourc	20				
1. Full Name (Last, First, Mido				Name of Employer			
Mailing Address				Occupation			
City	State	ZIP Code		Amount Guaranteed Outstanding:			
2. Full Name (Last, First, Mido	dle Initial)			Name of Employer			
Mailing Address				Occupation			
City	State	ZIP Code		Amount Guaranteed Outstanding:			
3. Full Name (Last, First, Mido	dle Initial)			Name of Employer			
Mailing Address				Occupation			
City	State	ZIP Code		Amount Guaranteed Outstanding:			
4. Full Name (Last, First, Middle Initial)				Name of Employer			
Mailing Address				Occupation			
City	State	ZIP Code		Amount Guaranteed Outstanding:			
SUBTOTALS This Period This Pa							



CHEDULE C (FEC F	orm 3X)						
DANS	,			Use separate schedu for each category of Detailed Summary Pa	the		
AME OF COMMITTEE (In Full)				-	ransaction ID : SC/10.5103		
COURAGEOUS CONS		S PAC					
LOAN SOURCE Full Name (Last, First, Middle Initial) Ekstrom, Christopher, , ,				N 🗌 Memo Ite	m Election: Primary General		
Mailing Address 25 Highland I Suite 100	Park Village				Other (specify) ▼		
City		State	ZIP Co	de			
Dallas		тх	7520	5			
Original Amount of Loan		Cumulative	Payment To	Date Ba	alance Outstanding at Close of This Peric		
	6500.00		<del>,</del> ,,,,	0.00	6500.00		
TERMS Date Incurred			Date Due	Interest R	ate Secured:		
	2017	M M / D		/31/2021 0.	.00 % (apr) Yes X N		
List All Endorsers or Guara	ntors (if any) t	o Loan Sour	се				
1. Full Name (Last, First, Mic				Name of Employer			
Mailing Address				Occupation			
City	State	ZIP Code		Amount Guaranteed Outstanding:			
2. Full Name (Last, First, Mic	Idle Initial)			Name of Employer			
Mailing Address				Occupation			
City	State	ZIP Code		Amount Guaranteed Outstanding:	· · · · · · · · · ·		
3. Full Name (Last, First, Mic	Idle Initial)			Name of Employer			
Mailing Address				Occupation			
City	State	ZIP Code		Amount Guaranteed Outstanding:			
4. Full Name (Last, First, Middle Initial)			Name of Employer				
Mailing Address				Occupation			
City	State	ZIP Code		Amount Guaranteed Outstanding:	· · · · · · · · · ·		
SUBTOTALS This Period This F				L	6500.00		

Defs' Approx. (F1000 ev. 05/2016

CHEDULE C (FEC F	orm 3X)		-				
DANS	ANS			Use separate schedu for each category of Detailed Summary Pa	the		
AME OF COMMITTEE (In Full	)			Transaction ID : SC/10.5146			
COURAGEOUS CONS		S PAC					
LOAN SOURCE Full Name (Last, First, Middle Initial) Ekstrom, Christopher, , ,				N Memo Item Election:			
Mailing Address 25 Highland Suite 100	Park Village				General Other (specify) ▼		
City		State	ZIP Coo	le			
Dallas		ТХ	7520	5			
Original Amount of Loan		Cumulative F	Payment To	Date Ba	alance Outstanding at Close of This Period		
	500.00			0.00	500.00		
TERMS Date Incurred			Date Due	Interest R	ate Secured:		
M M / D D / Y	YYYY	M M / D	D / Y	Y Y Y Y			
04 14	2018		12	/31/2025 0.	00 % (apr) Yes X No		
List All Endorsers or Guara	antors (if any) t	o Loan Sourc	e				
1. Full Name (Last, First, Mi	ddle Initial)			Name of Employer			
Mailing Address				Occupation			
City	State	ZIP Code		Amount Guaranteed Outstanding:	· · · · · · · · · · ·		
2. Full Name (Last, First, Mi	ddle Initial)			Name of Employer			
Mailing Address				Occupation			
City	State	ZIP Code		Amount Guaranteed Outstanding:	· · · · · · · · · · ·		
3. Full Name (Last, First, Mi	ddle Initial)			Name of Employer			
Mailing Address				Occupation			
City	State	ZIP Code		Amount Guaranteed Outstanding:	· · · · · · · · · · ·		
4. Full Name (Last, First, Mi	ddle Initial)	·		Name of Employer			
Mailing Address				Occupation			
City	State	ZIP Code		Amount Guaranteed Outstanding:			
UBTOTALS This Period This OTALS This Period (last page				L	500.00		

Defs' Appx: "10" Rev. 05/2016

CHEDULE C (FEC I DANS	HEDULE C (FEC Form 3X) ANS			Use separate scher		PAGE 42	OF 44
				for each category on Detailed Summary	of the Page	FOR LINE 13 OF FORM 3X	
AME OF COMMITTEE (In Fu	ll)			l	Transac	tion ID : SC/10.5	187
COURAGEOUS CON	SERVATIVE	S PAC					
LOAN SOURCE Full Name (Last, First, Middle Initial) Ekstrom, Christopher, , ,				N Memo Item Election:			
Mailing Address 25 Highland Suite 100	d Park Village					Other (specify	) 🔻
City		State	ZIP Coo	de			
Dallas		тх	7520	5			
Original Amount of Loan		Cumulative	Payment To	Date	Balance	Outstanding at	Close of This Peric
	22000.00		р. н. т. т. р. н. т. т.	0.00			22000.00
TERMS Date Incurre	d		Date Due	Interest	Rate		Secured:
M M / D D / Y 05 11	2018	M M / D		/31/2022	0.00	<b>9/</b> (apr)	Yes X N
						<b>%</b> (apr)	
List All Endorsers or Guar 1. Full Name (Last, First, N		o Loan Sourd	ce	Name of Employer			
Mailing Address				Occupation			
City	State	ZIP Code		Amount Guaranteed Outstanding:		<del>у</del>	- 480
2. Full Name (Last, First, N	liddle Initial)			Name of Employer			
Mailing Address				Occupation			
City	State	ZIP Code		Amount Guaranteed Outstanding:		<del>.</del>	
3. Full Name (Last, First, N	liddle Initial)			Name of Employer			
Mailing Address				Occupation			
City	State	ZIP Code		Amount Guaranteed Outstanding:		<del>,</del> , , ,	
4. Full Name (Last, First, N	liddle Initial)			Name of Employer			
Mailing Address				Occupation			
City	State	ZIP Code		Amount Guaranteed Outstanding:			
SUBTOTALS This Period This	Page (optional)						22000.00
<b>OTALS</b> This Period (last pag	e in this line only	/)		►		, ,	

Defs' Appx: "102"

HEDULE C (FEC I	Form 3X)		r				
DANS	ANS		Use separate schedule for each category of the Detailed Summary Page	ne			
ME OF COMMITTEE (In Fu	11)				Insaction ID : SC/10.5243		
	,	S PAC		110	15action 10 . 30/10.3243		
LOAN SOURCE Full Name (Last, First, Middle Initial) Ekstrom, Christopher, , ,				N Memo Item Election:			
Mailing Address 25 Highland Suite 100	d Park Village				General Other (specify) ▼		
City		State	ZIP Cod	le	1		
Dallas		ТΧ	75205	5			
Original Amount of Loan		Cumulative F	Payment To I	Date Ba	lance Outstanding at Close of This Period		
	6000.00			0.00	6000.00		
TERMS Date Incurre	d		Date Due	Interest Ra	te Secured:		
M M / D D / Y 06 08	2018	M M / D		y y y y /31/2020 0.0	00 % (apr) Yes 🗙 No		
List All Endorsers or Guar	rantors (if any) t	o Loan Sourc	e				
1. Full Name (Last, First, M				Name of Employer			
Mailing Address				Occupation			
City	State	ZIP Code		Amount Guaranteed Outstanding:			
2. Full Name (Last, First, M	liddle Initial)			Name of Employer			
Mailing Address				Occupation			
City	State	ZIP Code		Amount Guaranteed Outstanding:			
3. Full Name (Last, First, M	liddle Initial)	·		Name of Employer			
Mailing Address				Occupation			
City	State	ZIP Code		Amount Guaranteed Outstanding:			
4. Full Name (Last, First, M	liddle Initial)			Name of Employer			
Mailing Address				Occupation			
City	State	ZIP Code		Amount Guaranteed Outstanding:	· · · · · · · · · ·		
UBTOTALS This Period This OTALS This Period (last pag				· _	6000.00		

Defs' Appx: "103"

CHEDULE C (FEC	Form 3X)						
DANS	,			Use separate schedu for each category of	the	AGE 44	OF 44
				Detailed Summary Page			13 OF FORM 3X
AME OF COMMITTEE (In Fu		Ti	ransaction	ID : SC/10.6	152		
	SERVATIVE	S PAC					
LOAN SOURCE Full Name Ekstrom, Christopher, , ,		N Memo Item Election:					
Mailing Address 25 Highland Suite 100	d Park Village				C C	other (specify	) 🔻
City		State	ZIP Cod	de			
Dallas		ТХ	7520	5			
Original Amount of Loan		Cumulative P	ayment To	Date E	alance Ou	tstanding at	Close of This Peri
	30000.00			0.00		<del>,</del> ,,,,,	30000.00
TERMS Date Incurre			Date Due	Interest F	late	_	Secured:
02 / D D / Y	2023	M M / D		Demand 0	.00	<b>%</b> (apr)	Yes X N
List All Endorsers or Guar	rantors (if any) to	o Loan Source	е				
1. Full Name (Last, First, M		Name of Employer					
Mailing Address				Occupation			
City	State	ZIP Code		Amount Guaranteed Outstanding:			
2. Full Name (Last, First, M	liddle Initial)			Name of Employer			
Mailing Address				Occupation			
City	State	ZIP Code		Amount Guaranteed Outstanding:	· · ·		
3. Full Name (Last, First, M	liddle Initial)			Name of Employer			
Mailing Address				Occupation			
City	State	ZIP Code		Amount Guaranteed Outstanding:			· · · ·
4. Full Name (Last, First, Middle Initial)			Name of Employer				
Mailing Address				Occupation			
City	State	ZIP Code		Amount Guaranteed Outstanding:			
UBTOTALS This Period This			I	. 1			
				▶		<del>,</del> , ,	30000.00
<b>OTALS</b> This Period (last pag	je in this line only	/)		····· ►		, ,	324251.32

Defs' Appx: "104"

### **NON-RESIDENT CITATION**

### THE STATE OF TEXAS

Cause No: 2025-131-3

TO: COURAGEOUS CONSERVATIVE PAC, AN INDEPENDENT EXPENDITURE-ONLY POLITICAL ACTION COMMITTEE, DEFENDANT - BY SERVING STELLA DENN, 441 NORTH LEE STREET, SUITE 100, ALEXANDRIA, VIRGINIA 22134

#### **GREETINGS**:

**YOU ARE HEREBY COMMANDED** to appear before the Honorable District Court below, of McLennan County, Texas, at the Courthouse of said County located at 501 Washington Avenue in Waco, Texas, by filing a written answer with the Clerk of the Court, at or before 10 o'clock A.M. of the Monday next after the expiration of twenty days after the date of service of this citation, to the pleading described below, in the cause number described below on the docket of said court, and styled,

#### PARTIES TO THIS ACTION ARE:

### THE HON. PAT CURRY AND PAT CURRY FOR TEXAS

Plaintiffs

VS.

### COURAGEOUS CONSERVATIVE PAC, AN INDEPENDENT EXPENDITURE-ONLY POLITICAL ACTION COMMITTEE, CHRISTOPHER EKSTROM, AND JOHN OR JANE DOES 1-5

Defendants

Court: 74TH JUDICIAL DISTRICT

Pleading: PLAINTIFFS CURRY & CURRY FOR TEXAS' ORIGINAL PETITION FOR RELIEF UNDER TEX. ELEC. CODE § 273.81 AND PLAINTIFFS CURRY & CURRY FOR TEXAS' APPENDIX IN SUPPORT OF THEIR ORIGINAL PETITION FOR RELIEF UNDER TEX. ELEC. CODE § 273.81 Pleading File Date: JANUARY 17, 2025 Cause No: 2025-131-3

### NOTICE

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty days after you were served this citation and the above pleading, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org

The officer executing this citation shall promptly serve the same according to requirements of law, and the mandates hereof, and make due return as the law directs.

By:

**ISSUED AND GIVEN UNDER MY HAND AND SEAL OF OFFICE,** at Waco, McLennan County, Texas. Issue Date: **JANUARY 24, 2025.** 

ELIZABETH D. ALVAREZ 315 SOUTH BOIS D'ARC STREET FORNEY, TEXAS 75126 Attorney for Plaintiffs Jon R. Gimble, District Clerk 501 Washington Ave., Suite 300 Annex Waco, McLennan County, Texas 76701

SANDRA COTH

Defs' Appx. 105

, Deputy

## CAUSE NO. 2025-131-3

FILED MCLENNAN COUNTY 2/10/2025 9:29 AM JON R. GIMBLE DISTRICT CLERK

Defs' Appx. 106 Page 1

HON. PAT CuRRY, STATE	Paige Edmundson		
REPRESENTATIVE FOR TEXAS HOUSE DISTRICT 56, AND CURRY FOR TEXAS (A CAMPAIGN)	\$ \$	IN THE 74TH DISTRICT COURT	
Plaintiff(s),	8 §		
V.	§ §	OF	
COURAGEOUS CONSERVATIVES PAC; CHRISTOPHER EKSTROM, CHAIRMAN;	\$ \$ 8	MCLENNAN COUNTY, TEXAS	

Defendant(s).

### **RETURN OF SERVICE**

§

I, Monique Bernardo, state:

AND JOHN OR JANE DOES #1-5;

I am not a party to or interested in the outcome of this suit.

I received the following documents on February 4, 2025, at 1:11 pm. I delivered these documents to Courageous Conservatives PAC in VA on February 5, 2025 at 1:57 pm at 10521 Judicial Dr, 200-A, Fairfax, VA 22030 by leaving the following documents with Trey Mayfield who as Attorney at Juris Day Attorneys is authorized by appointment or by law to receive service of process for Courageous Conservatives PAC.

Citation, Plaintiffs Curry & Curry For Texas' Original Petition For Relief Under Tex. Elec. Code § 273.81; Plaintiffs Curry & Curry For Texas' Appendix In Support Of Their Original Petition For Relief Under Tex. Elec. Code § 273.81, and Exhibits

Additional Description: Confirmed that they accept legal documents for Courageous Conservatives PAC

White Male, est. age 45-54, glasses: Y, Brown hair, 180 lbs to 200 lbs, 5' 6" to 5' 9". Geolocation of Serve: https://google.com/maps?q=38.8689373412,-77.3202824864 Photograph: See Exhibit 1

Total Cost: \$320.00

My name is Monique Bernardo, I am 18 years of age or older, and my address is 5886 1st St S, Arlington, VA 22204, and USA.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in

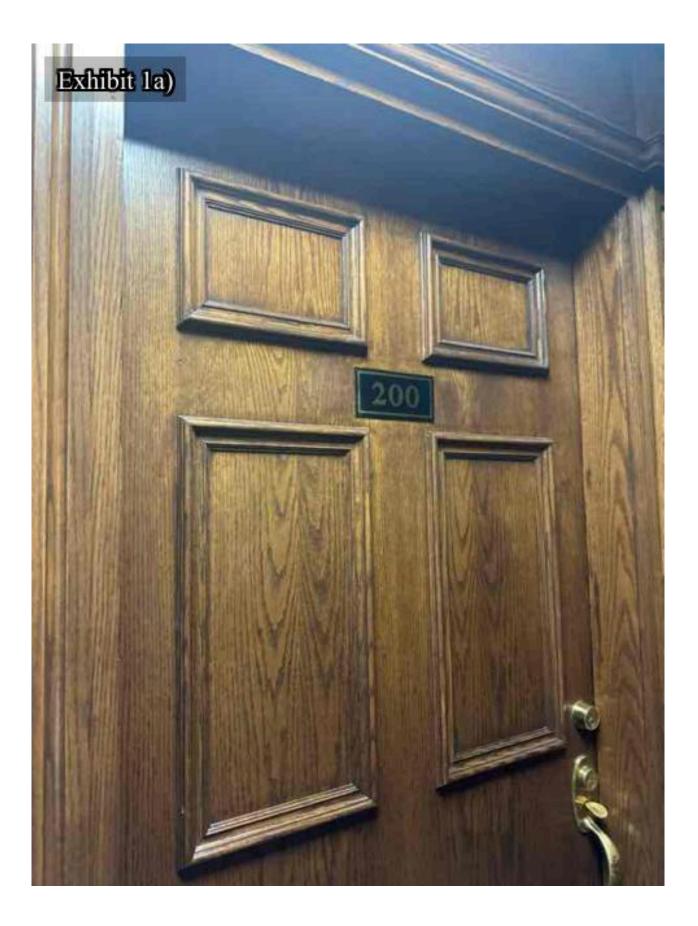
Fairfax County

VA on 2/7/2025

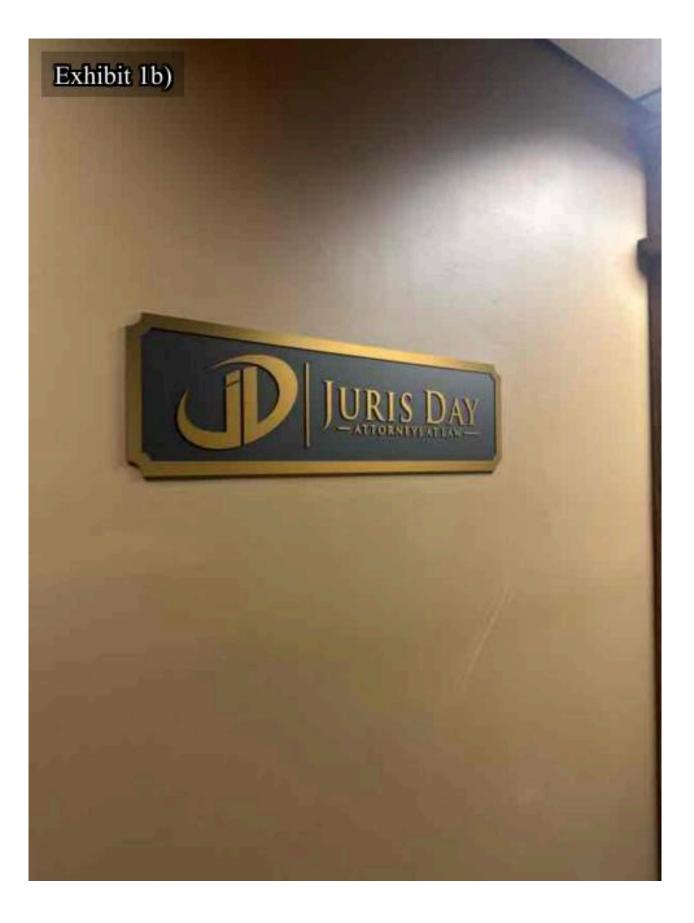
/s/ Monique Bernardo

Monique Bernardo +1 (703) 851-3697 Certification Number: N/A Expiration Date: N/A

# Defs' Appx. 107 Page 2



# Defs' Appx. 108 Page 3



# Defs' Appx. 109 Page 4

## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS AUSTIN DIVISION

FREE MARKET FOUNDATION, AMERICAN CIVIL LIBERTIES UNION OF TEXAS, TEXAS EAGLE FORUM PAC, KELLY SHACKELFORD, DAVID BROILES, <i>Plaintiffs.</i>	§ § § §	
V.	§ 8	CASE NO. 1:08cv116SS
	ş Ş	
DAVID A. REISMAN, in his official capacity	§	
as Executive Director of the Texas Ethics Commission;	§	
RAYMOND R. DAVENPORT, III, WILHELMINA	§	
DELCO, ROSS FISCHER, JIM GRAHAM, TOM	§	
HARRISON, PAULA M. MENDOZA, DAVID	§	
MONTAGNE, NICHOLAS C. TAYLOR, in their	§	
official capacity as members of the Texas Ethics	§	
Commission; JOHN R. ROACH, in his official	§	
capacity as District Attorney for Collin County, Texas	§	
and as representative of the class of District and	§	
County Attorneys in the state of Texas,	§	
Defendants.	§	

### DEFENDANTS' RESPONSE TO PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION

### TO THE HONORABLE LEE YEAKEL:

COME NOW The Texas Ethics Commission and its Executive Director and members in their official capacities, and file this response to Plaintiffs' Motion For Preliminary Injunction, and would show as follows:

### Introduction

Plaintiffs seek a Preliminary Injunction from this Court to prevent the enforcement of sections 302.017 and 302.019 of the Texas Government Code - two provisions that contain restrictions on contributions and expenditures in a campaign for the position of Speaker of the House. Although Plaintiffs' motion details a number of hypothetical restrictions on the ability to

contribute campaign funds and make independent expenditures, Plaintiffs' argument that a preliminary injunction is needed "before March 4 [or] it will be too late for Plaintiffs to engage in speech intended to persuade fellow Texans of how they should vote in that primary election" boldly ignores two critical points. First, their motion views chapter 302 of the Government Code in isolation while completely ignoring the entire Texas Election Code. Second, there is simply no demonstrable injury to Plaintiffs that will occur prior to March 4<sup>th</sup>, making an injunction improper.

### Statutory Background

Chapter 302 of the Government Code was passed on the heels of a massive scandal that forever altered the political landscape in Texas. The scandal centered on charges that state officials had made profitable bank-financed stock purchases in return for the passage of legislation desired by Houston banker Frank W. Sharp.<sup>1</sup> The Securities and Exchange Commission (SEC) investigated and indicted several Texas officials at the highest levels of government on charges of conspiracy to commit bribery. By the time the scandal, which became known as the "Sharpstown scandal," died down, state officials also had been charged with numerous other offenses, including nepotism and improper use of state funds. Texas Speaker of the House, Gus Mutscher, Jr., was among those implicated in the scandal. In 1972, Speaker Mutscher was found guilty and sentenced to five years' probation for conspiracy to accept bribes. The Sharpstown scandal ushered in a wave of new lawmakers to the Texas House and Senate in 1973. The 63<sup>rd</sup> Legislature passed a series of reform laws that, among other things, required state officials to disclose their sources of income, forced candidates to make public more details about their campaign finances, opened up governmental

<sup>&</sup>lt;sup>1</sup> See generally Mutscher v. State, 514 S.W.2d 905 (Tex. Crim. App. 1974) (summarizing the events of the Sharpstown scandal).

### Case 1:08-cv-00116-SS Document 31 Filed 02/22/08 Page 3 of 12

records to citizen scrutiny, expanded the requirement for open meetings of governmental policymaking agencies, and imposed new disclosure regulations on lobbyists. The reform bill requiring disclosure of campaign financing for the Speaker's race overwhelmingly passed the House 119-11, and the Senate 31 - 0. *See* "Speaker Candidate Bill Gets House OK, Goes to Senate," Houston Post, February 23, 1973; and "Senate Passes Reform For Speaker Campaign," Austin American, April 5, 1973, attached as Exhibit 1.

The campaign finance restrictions of Chapter 302 of the Government Code must be examined in light of this history. The reforms instituted in 1973, including the passage of Chapter 302, were a clear reaction to Sharpstown, and passed out of a fervent desire by the legislature to create absolute accountability over funds used in the campaign of a house member for Speaker of the House, and to remove the specter of bribery and corruption from the process of how an individual would gain election by his fellow members of the House to this position.

### **First Amendment Balancing Test**

In determining the constitutionality of campaign finance regulations, courts balance the government's legitimate interests in preserving the integrity of the election process with the speech rights of political participants. The Supreme Court has held that limits on campaign contributions can be permissible as long as the limits are "closely drawn to match a sufficiently important interest." *Randall v. Sorrell*, 126 S.Ct. 2479, 2491 (2007) (Breyer, J., plurality), *quoting Buckley v. Valeo*, 424 U.S. 1, 25 (1976). Expenditures, because they constitute core political expression, invoke even stronger First Amendment protection, and can only be restricted upon a showing of a compelling state interest. *Buckley*, 423 U.S. at 14-20. Courts have held that the governmental interest in preventing corruption and the appearance of corruption can be a sufficiently compelling reason to

justify campaign finance restrictions. *See Federal Election Comm'n v. Nat'l Conservative Political Action Committee*, 470 U.S. 480, 496-97 (1985); *Buckley*, 424 U.S. at 25-26. Moreover, when balancing First Amendment rights against legitimate governmental interests, another relevant factor is the availability of alternative means of communication. *Bell v. Wolfish*, 441 U.S. 520, 551-52 (1979) (internal quotation marks and citation omitted).

In 1973, the Texas legislature was clearly concerned about corruption and the appearance of corruption. This was no abstract concern - the bribery conviction of the Speaker in 1972 highlighted the need for strong campaign finance reforms, particularly in the area of the Speaker's race. Given the events of 1971-72, the Texas Legislature had an immediate and compelling interest in preventing any further corruption of the leadership of the legislature, as well as restoring public confidence in the integrity of the House members' internal election of the Speaker. That these regulations were narrowly tailored and provided ample alternate means of expression becomes clear when the challenged code sections are placed in the greater context of how campaigns for public office are regulated under the Texas Election Code.

### **Texas Election Code**

Plaintiffs' argument in this case is built upon two alleged propositions stressed in their motion: (1) Texas Government Code § 302.017 operates as a complete ban on contributions to a speaker candidate from any organization or group; and (2) § 302.019 restricts independent expenditures regarding a speaker candidate to an impermissibly low level (\$100). Claiming that they wish to give money as a group to a "speaker candidate" or make individual, independent expenditures on behalf of his or her candidacy, Plaintiffs have asked this Court to enjoin the operation of these two Government Code provisions.

Plaintiffs' assertions, however, are exaggerated, and carefully ignore the avenues of political expression available to corporations, political committees, and individuals under the Texas laws relating to the time period that Plaintiffs have made the focus of their motion for injunction (the period preceding the March primary and extending through the November general election); the type of election they seek to influence (the election of candidates to public office in the House of Representatives); and the types of contributions and expenditures they propose to make, including "independent expenditures."<sup>2</sup> These are the campaign finance laws found in Title 15 of the Texas Election Code, TEX. ELEC. CODE §§ 251.001 *et seq.* ("Title 15")<sup>3</sup>.

Indeed, Plaintiffs' argument requires this Court to skip over an essential fact as well as gloss over an entire body of Texas Law. First, no member of the public ever casts a ballot for Speaker of the House, because no person who ever succeeds to the position of Speaker can do so without first being elected to the Texas House of Representatives.<sup>4</sup> Second, anyone seeking election to the Texas House of Representatives is subject to the Texas Election Code - and specifically Title 15. Thus,

<sup>&</sup>lt;sup>2</sup> See Plaintiffs' Complaint at  $\P$  4,9,10,11,12,13,21,22,23,24,27,29,30,33,37,38,39,42. Although Plaintiffs use the term "independent expenditures," Texas law terms such expenditures "direct expenditures." *Id.* at § 251.001(8); 1 T.AC. § 20.1 (5). The Ethics Commission's rules define direct expenditure as follows:

<sup>(5)</sup> Direct campaign expenditure--A campaign expenditure that does not constitute a contribution by the person making the expenditure. A campaign expenditure is not a contribution from the person making the expenditure if:

<sup>(</sup>A) it is made without the prior consent or approval of the candidate or officeholder on whose behalf the expenditure was made; or

<sup>(</sup>B) it is made in connection with a measure, but is not a political contribution to a political committee supporting or opposing the measure.

Id.

<sup>&</sup>lt;sup>3</sup> Substantive portions of title 15 are attached to Exhibit 2.

<sup>&</sup>lt;sup>4</sup> See TEX. GOV'T CODE §302.001 (Speaker is elected by members of the house of representatives).

every candidate for the House of Representatives, including those candidates who may, if elected, seek the position of Speaker, is subject to the regulations of the Texas Election Code.

### **Texas Election Code, Title 15**

Title 15 regulates political funds and campaigns for public office,<sup>5</sup> including the appointment of a campaign treasurer;<sup>6</sup> restrictions on political contributions and expenditures in connection with a campaign for elective office;<sup>7</sup> and campaign reporting requirements.<sup>8</sup> These requirements differ depending, in part, on the type of entity making a political contribution or expenditure.<sup>9</sup>

As relates to the two individual plaintiffs in this lawsuit (Shackleford and Broiles), Title 15 imposes *no* dollar limits on the campaign contributions an individual may make to a candidate for the House of Representatives. Likewise, there are no limits on the amount of campaign expenditures an individual may make, although there are reporting requirements for direct or independent expenditures exceeding \$100.00. *Id.*, § 253.061, §253,062, § 254.031.

<sup>&</sup>lt;sup>5</sup> "[T]o be elected to a public office a candidate must receive more votes than any other candidate for the office." TEX.ELEC.CODE ANN. § 2.001 (Vernon 1986); *Moore v. Barr*, 718 S.W.2d 925, 927 (Tex. App.--Houston [14 Dist.]1986, no writ). A candidate cannot receive any votes unless the general election is held. *Id*.

<sup>&</sup>lt;sup>6</sup> *Id.*, Ch. 252, § 252.001 *et seq*.

<sup>&</sup>lt;sup>7</sup> Id., Ch. 253, § 253.001 et seq.

<sup>&</sup>lt;sup>8</sup> *Id.*, Ch. 254, § 254.001 *et seq.* 

<sup>&</sup>lt;sup>9</sup> A "political contribution" under Title 15 means a contribution to a candidate or political committee that is given with the intent that it be used in connection with a campaign for elective office or on a measure. *Id.* at §§ 251.001(3), (5). A "political expenditure" means an expenditure made in connection with a campaign for an elective office or on a measure. *Id.* at §§ 251.001(7), (10).

#### Case 1:08-cv-00116-SS Document 31 Filed 02/22/08 Page 7 of 12

Likewise, as to Texas Eagle Forum PAC, the "political committee" plaintiff in this lawsuit,<sup>10</sup> Title 15 imposes *no* dollar limits on the campaign contributions the committee may make to a candidate for the House of Representatives, nor are its campaign expenditures limited, provided the committee has first appointed a campaign Treasurer in conformance with Chapter 252, TEX. ELEC. CODE § 252.001 *et seq*. Moreover, political committees such as Texas Eagle Forum are not prohibited from making direct expenditures. *Id.* § 253.002(b)(4). Reporting requirements do apply. *Id.* § 254.031.

As for the corporate plaintiffs, (Free Market Foundation and ACLU of Texas), Texas law conforms with federal law in prohibiting political contributions and expenditures by corporations except as authorized by law.<sup>11</sup> Such restrictions, however, do not leave corporations without substantial opportunity for political speech and activity. For example, although contributions to candidates are not allowed,<sup>12</sup> corporations may make political expenditures to finance the establishment or administration of a general-purpose committee,<sup>13</sup> and to finance the solicitation of political contributions to such a committee from stockholders and employees. *Id.* § 253.100. Corporations may also make unreported direct campaign expenditures to communicate with their stockholders or members. *Id.* § 253.098.

The laws applicable to political committees would apply to any of the plaintiffs in this lawsuit should they choose to join together with another person to form their own political

<sup>&</sup>lt;sup>10</sup> Title 15 defines "political committee" as a group of persons that has as a principal purpose accepting political contributions or making political expenditures." *Id.* § 251.001(12).

<sup>&</sup>lt;sup>11</sup> *Id.* § 253.094. Title 15 applies to corporations organized under the Texas Business Corporation Act, the Texas Non-Profit Corporation Act, federal law, or the law of another state or nation. *Id.* § 253.091. It also applies to certain unincorporated associations not relevant here. *Id.* § 253.093.

<sup>&</sup>lt;sup>12</sup> *Id.* § 253.094.

<sup>&</sup>lt;sup>13</sup> A "general purpose committee" is defined at § 251.001(14).

committee, which is exactly what they say they want to do. Once a general purpose committee is formed, its allowable activities are virtually unlimited, subject to reporting requirements.

#### **Texas Election Code and Tex. Gov't Code, Chapter 302**

Texas statutes are construed with a presumption of their constitutionality, as well as a presumption that separate statutory provisions will be reconciled to give effect to all provisions. *See* TEX. GOV'T CODE §311.021. A plain reading of Title 15 of the Texas Election Code and Chapter 302 of the Government Code shows that the restrictions contained in ch. 302 relate only to the specific campaign for Speaker, but an entirely different set of campaign laws are in effect for all candidates for the House of Representatives - regardless of whether they will seek to become Speaker of the House if they are elected in November. *See* TEX. GOV'T CODE §302.0191 (referencing Title 15 contributions); TEX.ELEC.CODE § 251.001(1) (definition of "candidate" clearly encompasses individual running for State House of Representatives).

Reading these Texas laws in concert, the alleged constitutional injuries to the Plaintiffs can be addressed in short order. Citations to the Elections Code, *supra*, show that individuals, unincorporated organizations and groups, and political committees may contribute to the general campaign fund of a candidate for the House of Representatives, regardless of whether he or she may seek the position of Speaker after the general election. Furthermore, individuals and political committees may make independent expenditures regarding their preferred candidate's run for the House of Representatives, though there are reporting requirements for individuals who make independent expenditures exceeding \$100.

This leaves only the restrictions regarding the separate campaign fund, and independent expenditures regarding, the internal race among the elected 150 members of the Texas House of

Representatives as to who will be the Speaker of the House. And since there are minimal restrictions in Title 15 regarding donations and expenditures to the general campaign fund, the focus of any restrictions in this case must shift to the time period after the general election of the candidate for the House. It is only then that a candidate becomes, exclusively, a "speaker candidate" as opposed to a candidate for the House of Representatives who may seek to become the Speaker.

The cases cited by Plaintiffs in their motion (regarding the parameters of the First Amendment and campaign contributions and individual expenditures) uniformly address general elections and support of candidates for popular vote. As shown, above, Title 15 satisfies these legal standards - providing organizations and individuals ample opportunity to contribute and expend for and on behalf of a candidate for a publicly-elected position.

But the restrictions contained in TEX. GOV'T CODE §§ 302.017 and 302.019 pertain to an internal vote by the 150 members of the House of Representatives, and only make restrictions in relation to this internal "campaign" for the position of Speaker. The Texas Constitution states that "each House may determine the rules of its own proceedings . . . ." Tex. Const., Art. 3 § 11. The Texas Legislature, like all legislatures, has substantial discretion over its own affairs. The Speaker's race is an internal legislative affair, not a general election. It has been held that a tailored temporal prohibition of donations just before and during the legislative session will survive strict scrutiny when it advances a compelling state interest to prevent corruption and the appearance of corruption. *North Carolina Right to Life, Inc. v. Bartlett*, 168 F.3d 705, 715 (4<sup>th</sup> Cir. 1999)(affirming constitutionality of prohibition of lobbyist contributions to legislators immediately before and during legislative session).

#### Conclusion

Members of the Texas House are elected in November of even-numbered years, and the internal vote on Speaker occurs the following January. In order to protect the public from corruption in the election of the Speaker of the House, TEX. GOV'T CODE §§ 302.017 and 302.019 create transparency by effectively removing external, anonymous monetary influences from the House members' internal vote. Texas law, and especially the Texas Elections Code, provides Plaintiffs with ample - and constitutional - opportunities to support and expend on behalf of candidates for publicly elected offices. Considering the breadth of donations and expenditures permitted under the Elections Code, the restrictions regarding the internal Speaker's race are narrowly tailored to serve a compelling state interest.

Finally, Plaintiffs are seeking an injunction from this Court to prevent the enforcement of two sections of the Texas Government Code. Plaintiffs ask for this extraordinary relief on the basis of the most drastic of findings - requiring this Court to make a preliminary finding that two code sections that have been in effect for 35 years are unconstitutional. Despite an injunction standard that requires that Plaintiffs show they will suffer "irreparable injury" should this injunction not issue by March 4<sup>th</sup>, Plaintiffs have only alleged a hypothetical injury based on an incomplete assessment of Texas election law. Despite the requirement that Plaintiffs demonstrate that the injunction they seek will not disserve the public interest, Plaintiffs baldly assert their desire to invalidate laws that were passed with the clear intent, and decades of subsequent affect, of protecting the public from corruption.

#### Prayer

ACCORDINGLY, Defendants pray this Court deny Plaintiffs' Motion for Preliminary Injunction.

10

Respectfully submitted,

GREG ABBOTT Attorney General of Texas

KENT C. SULLIVAN First Assistant Attorney General DAVID S. MORALES Deputy Attorney General for Civil Litigation

ROBERT B. O'KEEFE, Chief General Litigation Division

<u>/s/ James "Beau" Eccles</u> JAMES "BEAU" ECCLES Assistant Attorney General Texas Bar No. 00793668 Attorney-in-Charge General Litigation Division P.O. Box 12548, Capitol Station Austin, Texas 78711-2548 (512) 463-2120 (512) 320-0667 FAX

ATTORNEYS FOR DEFENDANT

11

### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document has been sent *via* electronic transmission on February 22, 2008, to:

James C. Ho Lawrence J.C. VanDyke Gavin S. Martinson GIBSON DUNN & CRUTCHER LLP 2100 McKinney Avenue, Suite 1100 Dallas, Texas 75201

Hiram S. Sasser III LIBERTY LEGAL INSTITUTE 903 e. 18<sup>TH</sup> Street, Suite 230 Plano, Texas 75074

Lisa Graybill AMERICAN CIVIL LIBERTIES UNION FOUNDATION OF TEXAS 1210 Rosewood Avenue Austin, Texas 78702

> <u>/s/ James "Beau" Eccles</u> JAMES "BEAU" ECCLES Assistant Attorney General

KeyCite Yellow Flag - Negative Treatment

Declined to Follow by Morello v. State, Tex.App.-Austin (3 Dist.), May 6, 2016

2016 WL 240773 Only the Westlaw citation is currently available.

SEE TX R RAP RULE 47.2 FOR DESIGNATION AND SIGNING OF OPINIONS.

Court of Appeals of Texas, Austin.

Steve KEY; Pat Curry; PJC Properties, L.L.C.; and PJC Central Texas Freight Lines, L.L.C., Appellants

Daniel R. RICHARDS, as Receiver for Centex Freight Lines, L.L.C. and Prudence Adams, Appellees

> NO. 03–14–00116–CV | Filed: January 13, 2016

### FROM THE COUNTY COURT AT LAW NO. 1 OF TRAVIS COUNTY, NO. C-1-CV-12-000159, HONORABLE J. DAVID PHILLIPS, JUDGE PRESIDING

#### **Attorneys and Law Firms**

David Michael Walsh IV, Henry Inga, William H. Chamblee, Chamblee, Ryan, Kershaw & Anderson, P.C., Dallas, TX, for Appellant.

Clark Richards, Richards Rodriguez & Skeith, LLP, B. Russell Horton, George, Brothers, Kincaid & Horton L.L.P., Austin, TX, for Appellee.

Before Justices Puryear, Pemberton, and Bourland

#### **MEMORANDUM OPINION**

#### David Puryear, Justice

\*1 Steve Key, Pat Curry, PJC Properties, L.L.C. (PJC Properties), and PJC Central Texas Freight Lines, L.L.C. (PJC Centex), appeal the trial court's final judgment awarding damages and equitable relief on appellees' fraudulent-transfer and veil-piercing claims. Appellants argue that the trial court improperly applied the veil-piercing doctrine to impose

individual liability on Key and Curry, that the evidence was insufficient to support the jury's fraudulent-transfer finding, and that appellees' claims were barred by the applicable statute of limitations. We will affirm the judgment.

After unsuccessful attempts to collect on a judgment that she obtained against Centex Freight Lines, L.L.C. (Centex) in a lawsuit alleging sexual harassment and retaliatory discharge, Prudence Adams and court-appointed receiver for Centex, Daniel R. Richards, filed this lawsuit alleging appellants' fraudulent transfer of Centex's assets to its owners' alterego company, PJC Properties, <sup>1</sup> for the unlawful purpose of evading payment of the judgment. The challenged transaction was a foreclosure and sale of Centex's assets to PJC Properties after default on a loan purportedly secured by all of Centex's assets. The jury found that the asset transfer was fraudulent under the Uniform Fraudulent Transfer Act (UFTA) because PJC Properties did not have an enforceable security interest in the assets and that, therefore, Centex did not receive "reasonably equivalent value" in exchange for the assets. See Tex. Bus. & Com.Code § 24.006(a). The jury also found that Key, Curry, and PJC Properties were "responsible" for the unfair conduct of Centex, PJC Properties, and PJC Centex and that holding only Centex responsible for liability on the Adams judgment would result in injustice. Accordingly, the trial court awarded Adams damages in the full amount of her prior judgment jointly and severally against Key, Curry, and PJC Properties as well as attorney's fees and awarded the receiver possession and title of all assets owned or held by Centex as of the date of the Adams judgment.

1

Curry owns 99% of PJC Properties, and Key owns the remaining 1%. PJC Properties wholly owns PJC Centex. According to its company agreement and IRS records, Centex (no longer an active entity) was wholly owned by Walkabout Transportation, LLC, which, in turn, was wholly owned by Curry (although Key testified in his deposition that Walkabout was owned 41% by Key, 49% by PJC Properties, and 10% by an individual not party to this suit).

#### Fraudulent-transfer finding

Appellants contend that there was legally and factually insufficient evidence to support the jury's finding in Question 1 that the transfer of Centex's assets to PJC Properties was fraudulent as to Adams. Specifically, they complain that the evidence was insufficient to support the necessary finding that PJC Properties did not have an enforceable security interest in Centex's assets. *See id.* Appellants argue that appellees' claim about the security interest was based merely on suspicion rather than evidence, based on attempts at trial to characterize the "primary evidence" (in the form of a signed promissory note, dated before the Adams judgment, in which Centex gave PJC Properties a security interest in its assets) as a sham document that had been backdated.

\*2 After reviewing the record, we conclude that there was sufficient evidence to support the jury's finding. Evidence at trial included the following: responses to post-judgment discovery after the first trial in which Key stated that there was no property of Centex that had been pledged as security for a debt and no documents referring to any liabilities of Centex or assets securing any debts; two UCC financing statements noting a purported security interest in certain trucks and in all of Centex's property that were filed, respectively, just before the initial lawsuit and the day after the jury reached its verdict in the first lawsuit; Key's testimony in his May, 2011 deposition that the only documents of which he was aware or had ever seen identifying PJC Properties as a secured lender were the two financing statements;<sup>2</sup> the inability of Lynn Maxwell and Curry, the two individuals who maintain business records of PJC Properties, to produce a promissory note or security agreement or to identify their existence or location during their depositions; and inconsistency between the terms of the promissory note that appellants eventually produced (dated 2007) requiring annual payments and Key's deposition testimony indicating that the loan required monthly payments. The jury was free to believe evidence such as this, disbelieve trial testimony and documentary evidence to the contrary, and conclude that the purported security interest was a sham. See City of Keller v. Wilson, 168 S.W.3d 802, 807, 827-28 (Tex.2005) (in legal-sufficiency review, we must view evidence in light most favorable to verdict, crediting favorable evidence if reasonable jurors could, and disregarding contrary evidence unless reasonable jurors could not); Cain v. Bain, 709 S.W.2d 175, 176 (Tex. 1986) (in factual-sufficiency review, we may set aside verdict only if evidence that supports jury finding is so weak as to be clearly wrong and manifestly unjust). We overrule appellants' third issue.

<sup>2</sup> The financing statements could not have created a security interest because they are not signed by the debtor as required by the UCC. *See* Tex. Bus. & Com.Code § 9.203(b)(3)(A).

Appellants also argue that the trial court improperly pierced the corporate veil to impose individual liability against Key and Curry. We begin our discussion of this issue by noting the longstanding common law in Texas recognizing that courts may disregard the corporate structure and hold a corporate agent responsible for corporate liabilities "when the corporate form has been used as part of a basically unfair device to achieve an inequitable result." SSP Partners v. Gladstrong Investments (USA) Corp., 275 S.W.3d 444, 454 (Tex.2008) (noting that Texas law has long permitted corporate structure to be disregarded on showing of constructive fraud, citing Castleberry v. Branscum, 721 S.W.2d 270, 271-72 (Tex.1986), and that legislature's amendments to former Business Corporations Act began requiring actual fraud to disregard structure for corporation's contractual obligations); see also Shook v. Walden, 368 S.W.3d 604, 614 (Tex.App. -Austin 2012, pet. denied) (noting that "Texas courts ... have uniformly held (or at least assumed) that an LLC's veil could be pierced under extra-statutory equitable principles, although the Texas Supreme Court has yet to definitively address that question"); McCarthy v. Wani Venture, A.S., 251 S.W.3d 573, 590 (Tex.App.—Houston [1st Dist.] 2007, pet. denied) (noting that, despite LLC statute providing that members are not individually liable for obligations of LLC, "Texas courts and other jurisdictions ... have applied to LLCs the same state law principles for piercing the corporate veil that they have applied to corporations.").

Secondly, we note the well-established rule in Texas thatindependently of the equitable doctrine of veil-piercingan entity's agent is personally liable for his own fraudulent or tortious acts. See Miller v. Keyser, 90 S.W.3d 712, 717 (Tex.2002); Leyendecker & Assocs., Inc. v. Wechter, 683 S.W.2d 369, 375 (Tex.1984); JJJJ Walker, LLC v. Yollick, 447 S.W.3d 453, 470 (Tex.App.—Houston [14th Dist.] 2014, pet. filed); Sanchez v. Mulvaney, 274 S.W.3d 708, 712 (Tex.App. -San Antonio 2008, no pet.). Thus, the corporate veil "is not required to be pierced" in an action seeking to hold a corporate agent individually liable for his tortious or fraudulent acts. Sanchez, 274 S.W.3d at 712 (drawing distinction between contract claims, for which plaintiff may pierce LLC's veil upon showing of actual fraud, and tort claims, for which LLC member is individually liable for own tortious acts); see also Shook, 368 S.W.3d at 621 (noting that case law and legislature have long recognized distinction "between the perceived relative equities of veil-piercing claimants who are asserting tort theories of recovery versus those suing in contract").

#### Piercing the corporate veil

\*3 Here, the relevant jury questions and instructions (Questions 2 and 3) inquiring whether appellants were "responsible" for the conduct of PJC Properties and Centex defined "responsible" as, among other illustrations, "transferr[ing] the assets ... to avoid a judgment or debt" or "us[ing] the entity as a means of evading an existing legal obligation."<sup>3</sup> We conclude that the jury's affirmative finding in Question 1 that a fraudulent transfer occurred, combined with an affirmative finding to Questions 2 and 3 finding Key and Curry responsible for such tortious conduct, support imposing individual liability on Key and Curry. See Walker v. Anderson, 232 S.W.3d 899, 918 (Tex.App.-Dallas 2007, no pet.) (fraudulent transfer of assets is tort); In re Texas Am. Express, Inc., 190 S.W.3d 720, 725 (Tex.App.-Dallas 2005, orig. proceeding) (same). While the instructions in Questions 2 and 3 tracked language in veil-piercing case law, see, e.g., SSP Partners, 275 S.W.3d at 451, it was not necessary for the trial court to employ the equitable doctrine to impose individual liability on Key and Curry in light of the jury's findings and on this record; Key and Curry are individually liable for their own tortious conduct in participating in and directing the wrongdoing.<sup>4</sup> See Walker, 232 S.W.3d at 918.

<sup>3</sup> Questions 2 and 3, respectively, inquired whether each Curry and Key were "responsible for [Centex LLC, PJC Properties, or PJC Centex's] conduct" and provided a separate "yes" or "no" answer line with respect to each entity. The instructions provided the following definitions of being "responsible" for an entity's conduct:

> [Defendant] used the entity as a sham to perpetrate a fraud, and holding only the entity responsible would result in injustice, or

[Defendant] used the entity as a means of evading an existing legal obligation, and holding only the entity responsible would result in injustice, or

[Defendant] used the entity as a means of circumventing a statute, and holding only the entity responsible would result in injustice, or

[Defendant] used the entity to protect a crime or to justify a wrong, and holding only the entity responsible would result in injustice, or

[Defendant] transferred the assets of Centex Freight Lines, LLC to PJC Central Texas Freight Lines, LLC to avoid a judgment or debt and holding only Centex Freight Lines, LLC, PJC Properties, LLC or PJC Central Texas Freight Lines, LLC responsible would result in injustice.

4

We acknowledge that the legislature has broadly insulated LLC members from liability for an LLC's obligations, see Tex. Bus. Orgs.Code § 101.114 ("Except as and to the extent the company agreement specifically provides otherwise, a member or manager is not liable for a debt, obligation, or liability of a limited liability company, including a debt, obligation, or liability under a judgment, decree, or order of a court."); however, without clear direction from the Supreme Court holding that the legislature has thereby abrogated longstanding common law recognizing that corporate agents are liable for their own tortious conduct and may even be liable for an entity's liabilities based on the equitable principles of veil piercing, we refuse to hold that section 101.114 shields Key and Curry from their tortious fraudulent transfer under the circumstances in this case.

In this same issue, appellants complain about the jury charge's "insufficient guidance" on the issue of veil-piercing in Questions 2 and 3, arguing that each question (a) erroneously listed all three of the entities involved in this lawsuit (Centex, PJC Properties, and PJC Centex) when asking whether Key and Curry were "responsible" for the entities' conduct and (b) improperly defined what "responsible for the conduct" means by taking a "kitchen sink" approach in listing several improper theories of veil-piercing. With respect to each challenged question's containing multiple entities in asking whether defendants were responsible for their respective conduct, appellants did not specifically object to the instructions on this basis and have, therefore, waived any alleged error. *See* Tex.R.App. P. 33.1; Tex.R. Civ. P. 274.

\*4 With respect to the instructions' allegedly improper "kitchen sink" definition of "responsible conduct," we conclude that the trial court did not abuse its discretion, both because of our conclusion that application of the veilpiercing doctrine was not necessary to impose individual liability on appellants and because, in any case, the definitions were supported by applicable case law. *See Texas Dep't of Human Servs. v. E.B.*, 802 S.W.2d 647, 649 (Tex.1990) (op. on reh'g) (jury charge is reviewed for abuse of discretion, which occurs only if trial court acts without reference to any guiding principles); *Connell Chevrolet Co., Inc. v. Leak*, 967 S.W.2d 888, 894 (Tex.App.—Austin 1998, no pet.) ("If the charge resolves the controlling issues raised by the pleadings and any evidence in a feasible manner that does not confuse the jury. no error occurs."). The court's instructions were derived from applicable case law and are accurate statements of the law. See SSP Partners, 275 S.W.3d at 451 (citing Castleberry for first four examples court provided in instructions of circumstances under which veil-piercing may be justified); Noorani Gas & Convenience, Inc. v. State, No. 03-06-00463-CV, 2008 WL 1827605, \*18-19 (Tex.App.-Austin Apr. 24, 2008, no pet.) (mem.op.) (supporting fifth example in instructions by noting that "[c]ourts have consistently pierced the corporate veil when an indebted corporation transfers assets to another corporation to avoid a judgment or debt"); see also Klein v. Sporting Goods, Inc., 772 S.W.2d 173, 176 (Tex.App.-Houston [14th Dist.] 1989, writ denied) (holding evidence legally and factually sufficient to pierce veil and support jury finding of constructive fraud where evidence showed that defendant formed new entity that was "merely a continuation" of previous entity and foreclosed on secured debt to avoid unsecured creditors).

Lastly in this same issue, appellants contend that the evidence was legally and factually insufficient to support imposing individual liability on them for the fraudulent transfer. See Wilson, 168 S.W.3d at 827 (outlining legal-sufficiency standard of review); Cain, 709 S.W.2d at 176 (outlining factual-sufficiency standard of review). Our review of the entire record leads us to conclude that the evidence is legally and factually sufficient to support the jury's findings and the court's judgment imposing individual liability on Key and Curry. Evidence demonstrating appellants' ownership and control of the various entities (e.g., Key was the president of Centex at the relevant times and oversaw its day-to-day operations, while Curry wholly owned Centex and 99% of PJC Properties and was responsible for its management, which allegedly included making a loan to Centex); the relationship between the timing of occurrences such as: the prior Adams lawsuit, the UCC filings, the purported foreclosure by PJC Properties, the formation of PJC Centex (which included the carry over of the same employees, offices, and business operations of Centex without interruption), and the eventual production of documents purportedly creating a secured loan; Curry and Key's use of the same attorney to represent both creditor (PJC Properties) and debtor (Centex) in the purported foreclosure and UCC filings; and the admitted purpose of the purported foreclosure to prevent Adams from collecting on her judgment all support the jury's findings and trial court's conclusions, which are not contrary to the overwhelming

weight of the evidence. Accordingly, we overrule appellants' first issue.

#### Damages

5

In their second issue, appellants contend that the judgment is "irreconcilably flawed" because it provides for a "double recovery" by awarding Adams damages in the amount of \$157,280.93 against them jointly and severally while also granting the receiver equitable relief in the form of possession and title to all of Centex's assets as of the date of the Adams judgment.<sup>5</sup> Cf. Tex. Bus. & Com.Code § 24.008 (listing remedies under UFTA to include avoidance of fraudulent transfer, attachment of assets, injunction against further disposition of assets, appointment of receiver, and "any other relief the circumstances may require"). However, appellants have waived the complaint by not making it to the trial court. See Tex.R.App. P. 33.1; Major Help Ctr., Inc. v. Ivy, Crews & Elliott, P.C., No. 03-99-00285-CV, 2000 WL 298282, at \*5 (Tex.App.—Austin 2000, no pet.) (mem.op.) (defendant waives issue of double recovery if not raised before trial court); see also Eagle Fabricators, Inc. v. Rakowitz, 344 S.W.3d 414, 423 (Tex.App.—Houston [14th Dist.] 2011, no pet.) (defendant who fails to raise issue of improper measure of damages waives error).

We note that the judgment does not award *Adams* any assets or other property of Centex but awards such property only to the receiver.

\*5 In the same issue, appellants also contend that there was legally and factually insufficient evidence of the amount of damages awarded to Adams and that she did not request and obtain necessary jury findings to support the award. See Tex. Bus. & Com.Code § 24.009 (when fraudulent transfer is voidable by creditor under section 24.008, creditor may recover judgment for value of asset transferred or amount necessary to satisfy creditor's claim, whichever is less). However, appellants have failed to preserve this issue as well. See Cecil v. Smith, 804 S.W.2d 509, 510-11 (Tex.1991) (challenges to legal sufficiency of evidence must be preserved by: motion for instructed verdict, motion for judgment notwithstanding verdict, objection to submission of issue to jury, motion to disregard jury's answer to vital fact issue, or motion for new trial specifically raising complaint); Tex.R. Civ. P. 324(b)(2) (challenges to factual sufficiency of evidence must be raised in motion for new trial). Accordingly, we overrule appellants' second issue.

#### Statute of limitations

In their last issue, appellants contend that appellees' UFTA claims were barred by a one-year statute of limitations instead of the four-year period that appellees claim applies. See Tex. Bus. & Com.Code § 24.010(a)(2), (3) (cause of action for fraudulent transfer is extinguished unless brought within four years if brought under section 24.006(a) or within one year if brought under section 24.006(b)). We agree with appellees, who brought their claim under section 24.006(a) as a "reasonably equivalent value" claim, not as an "insider" claim under section 24.006(b).<sup>6</sup> The mere fact that Key and Curry may have been insiders does not transform appellees' claim from one alleging that the transfer or obligation at issue was made without the debtor (Centex) receiving equivalent value in exchange, see id. § 24.006(a), into one alleging that the transfer was made to an insider for an antecedent debt, see id. § 24.006(b). The jury was asked, in Question 1, whether the transfer of Centex's assets to PJC Properties was fraudulent as to Adams, and the definition of a fraudulent transfer contained therein tracked the language of subsection (a). Accordingly, appellees' claims were not barred by limitations, and we overrule appellants' fourth issue.

6

The respective sections defining actionable fraudulent transfers provide:

(a) A transfer made or obligation incurred by a debtor is fraudulent as to a creditor whose claim arose before the transfer was made or the obligation was incurred *if the debtor made the transfer or incurred the obligation without receiving a reasonably equivalent value in exchange* for the transfer or obligation and the debtor was insolvent at that time or the debtor became insolvent as a result of the transfer or obligation.

(b) A transfer made by a debtor is fraudulent as to a creditor whose claim arose before the transfer was made *if the transfer was made to an insider for an antecedent debt*, the debtor was insolvent at that time, and the insider had reasonable cause to believe that the debtor was insolvent.

Tex. Bus. & Com.Code § 24.006 (emphases added).

Having overruled all of appellants' issues, we affirm the judgment.

Concurring Opinion by Justice Pemberton

#### **CONCURRING OPINION**

#### Bob Pemberton, Justice

I join the Court's judgment, although I respectfully differ in my reasoning, chiefly in regard to the judgment award of money damages against Curry and Key individually. I cannot agree with the Court that Curry or Key's personal monetary liability can rest upon a theory of direct tort liability-indeed, not even appellees have advocated that we can affirm on such a theory. Instead, as appellees have recognized, Curry and Key's individual monetary liability must rest upon the "veil-piercing" theories that were submitted in Question 2, 3, or 4 of the jury charge. As to those bases for individual liability, I would hold there was no reversible error. But in doing so, I would emphasize that appellants did not preserve below, and thus we are not called upon to address, the broadest challenge they now advance on appeal against the jury's veil-piercing findings-that Texas law simply does not allow the piercing of an LLC's veil as one can with a business corporation, or at least does not allow it to the same extent. This is potentially a more vexing question than one might assume initially because of the curious phrasing of section 101.002 of the Business Organizations Code, which applies to LLCs the statutory provisions governing veil-piercing of business corporations, but with the preceding qualifier, "Subject to Section 101.114," a reference to the general statutory limitations on the liability of LLC members.<sup>1</sup> Nor did we resolve this question in  $Shook^2$  with respect to either section 101.002 (which took effect after the trial in that case)<sup>3</sup> or the prior law—there, as here, the defendant had conceded below the general proposition that Texas LLC veils can be pierced in some circumstances and preserved only arguments regarding the elements that one would have to prove if that were so.<sup>4</sup> Absent more definitive guidance from the Legislature or Texas Supreme Court, that is a question for another day.

See Tex. Bus. Orgs.Code § 101.002 ("Subject to Section 101.114, Sections 21.223, 21.224, 21.225, and 21.226 [i.e., the statutory veil-piercing standards applicable to business corporations] apply to a limited liability company and the company's members, owners, assignees, affiliates,

1

and subscribers.") (emphasis added); *id.* § 101.114 ("Except as and to the extent the [LLC] company agreement specifically provides otherwise, a member or manager is not liable for a debt, obligation, or liability of a limited liability company, including a debt, obligation, or liability under a judgment, decree, or order of a court.").

- <sup>2</sup> Shook v. Walden, 368 S.W.3d 604 (Tex.App.— Austin 2012, pet. denied).
- <sup>3</sup> See id. at. 607 n.1.
- 4 See id. at 607 ("Specifically, we must determine whether, assuming these ['equitable "veilpiercing" principles that have evolved in regard to business corporations'] can be applied to LLCs, a claimant seeking to 'pierce' an LLC's 'veil' with respect to the entity's contractual liabilities must prove—as has long been required by statute when piercing the veil of a business corporation—that the person against whom liability is sought to be imposed used the LLC to perpetrate actual fraud

for the person's direct personal benefit.") (emphasis added); id. at 611 ("Shook asserts that neither of these [veil-piercing] findings was legally sufficient to support the judgment because the Waldens were required also to prove, and failed to prove, that he had used [the LLC] to perpetrate actual fraud upon the Waldens for his 'direct personal benefit' before the district court could validly pierce [the LLC's] veil and impose the entity's contractual obligations on him individually."); id. at 614 ("Shook has not disputed that, as a general proposition, the veil of an LLC, like that of a corporation, may be pierced in some circumstances," but argued that "it follows ... that the same standards, restrictions, and limitations govern the availability and application of the veilpiercing remedy against both types of entities.") (emphases added).

\*6 With these caveats, I join in the Court's judgment.

#### **All Citations**

Not Reported in S.W. Rptr., 2016 WL 240773

End of Document

© 2025 Thomson Reuters. No claim to original U.S. Government Works.

	Image#	20241	024971	0305862
--	--------	-------	--------	---------

PAGE 1 / 45

FEC A	EPORT OF F ND DISBURS	SEMENTS	Office Use Only
1. NAME OF T COMMITTEE (in full)	YPE OR PRINT ▼	Example: If typing, type over the lines.	12FE4M5
ADDRESS (number and street)  Check if different than previously reported. (ACC)  FEC IDENTIFICATION NUM	5 Halifax Ct Marlton		Image: NJ       08053       -       Image: NJ       08053         STATE ▲       ZIP CODE ▲
C C00587022	3. IS RE	THIS NEW PORT (N) OR	AMENDED (A)
<ul> <li>4. TYPE OF REPORT (Choose One)</li> <li>(a) Quarterly Reports:</li> <li>April 15 Quarterly Report (Q1)</li> <li>July 15 Quarterly Report (Q2)</li> <li>October 15 Quarterly Report (Q3)</li> <li>January 31 Year-End Report (YE)</li> <li>July 31 Mid-Year Report (Non-election Year Only) (MY)</li> <li>Termination Report (TER)</li> </ul>	Report Due On: Apr 20 (c) 12-Day PRE-Election Report for the:	Primary (12P) Convention (12C) on 11 05 / General (30G)	) Sep 20 (M9) Dec 20 (M12) (Non-Election Year Only) Pear Only)
5. Covering Period	Beport and to the best of m	through 10	true, correct and complete
Type or Print Name of Treasurer Signature of Treasurer	Denn, Stella, , ,		Date 10 / 24 2024 this Report to the penalties of 52 U.S.C. § 30109.
Office Use Only			FEC FORM 3X Rev. 05/2016
		[	Def's Appx. 128

#### SUMMARY PAGE OF RECEIPTS AND DISBURSEMENTS

Page 2

Write or Type Committee Name

FEC Form 3X (Rev. 05/2016)

_	COURAGEOUS CONSERVATIVE	ES PAC	
F	Report Covering the Period: From:	10 / 01 / Y Y Y Y 2024 To:	10 / D D / Y Y Y Y 10 16 2024
		COLUMN A This Period	COLUMN B Calendar Year-to-Date
6.	(a) Cash on Hand January 1, 2024	[	7251.26
	(b) Cash on Hand at Beginning of Reporting Period	15609.33	
	(c) Total Receipts (from Line 19)	26.00	185623.15
	<ul> <li>(d) Subtotal (add Lines 6(b) and</li> <li>6(c) for Column A and Lines</li> <li>6(a) and 6(c) for Column B)</li> </ul>	15635.33	192874.41
7.	Total Disbursements (from Line 31)	2526.64	179765.72
8.	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	13108.69	13108.69
9.	Debts and Obligations Owed <b>TO</b> the Committee (Itemize all on Schedule C and/or Schedule D)	0.00	
10	. Debts and Obligations Owed <b>BY</b> the Committee (Itemize all on Schedule C and/or Schedule D)	324251.32	

This committee has qualified as a multicandidate committee. (see FEC FORM 1M)

For further information, contact the Federal Election Commission at 800-424-9530 or visit www.fec.gov

Image#	20241	024971	0305864
--------	-------	--------	---------

### **DETAILED SUMMARY PAGE**

of Receipts

FEC Form 3X (Rev. 05/2016)

Write or Type Committee Name

# COURAGEOUS CONSERVATIVES PAC

Report Covering the Period: From:	/ D D / Y Y Y Y 01 / 2024 To	10 / D D / Y Y Y Y 10 16 / 2024
I. Receipts	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
1. Contributions (other than loans) From: (a) Individuals/Persons Other		
Than Political Committees (i) Itemized (use Schedule A)	25.00	20622.15
(ii) Unitemized	1.00	1.00
(iii) TOTAL (add Lines 11(a)(i) and (ii)►	26.00	20623.15
(b) Political Party Committees (c) Other Political Committees	0.00	0.00
(d) Total Contributions (add Lines	0.00	165000.00
11(a)(iii), (b), and (c)) (Carry Totals to Line 33, page 5)	26.00	185623.15
2. Transfers From Affiliated/Other Party Committees	0.00	0.00
3. All Loans Received	0.00	0.00
<ol> <li>Loan Repayments Received</li> <li>Offsets To Operating Expenditures</li> </ol>	0.00	0.00
(Refunds, Rebates, etc.) (Carry Totals to Line 37, page 5) 3. Refunds of Contributions Made	0.00	0.00
to Federal Candidates and Other Political Committees	0.00	0.00
<ul> <li>7. Other Federal Receipts (Dividends, Interest, etc.)</li></ul>	0.00	0.00
(a) Non-Federal Account (from Schedule H3)	0.00	0.00
(b) Levin Funds (from Schedule H5)	0.00	0.00
(c) Total Transfers (add 18(a) and 18(b))	0.00	0.00
<ol> <li>Total Receipts (add Lines 11(d),</li> <li>10, 10, 14, 15, 10, 17, and 10(a))</li> </ol>		405000 45
12, 13, 14, 15, 16, 17, and 18(c))▶	26.00	185623.15
0. Total Federal Receipts (subtract Line 18(c) from Line 19)►	26.00	185623.15

Def's Appx. 130

Page 3

### DETAILED SUMMARY PAGE

of Disbursements

FEC Form 3X (Rev. 05/2016) Page 4 COLUMN A COLUMN B **II. Disbursements Total This Period Calendar Year-to-Date** 21. Operating Expenditures: Allocated Federal/Non-Federal (a) Activity (from Schedule H4) 0.00 0.00 Federal Share ..... (i) 0.00 0.00 (ii) Non-Federal Share..... (b) Other Federal Operating 1526.64 7721.64 Expenditures ..... (c) Total Operating Expenditures 7721.64 (add 21(a)(i), (a)(ii), and (b)) 1526.64 22. Transfers to Affiliated/Other Party Committees..... 0.00 0.00 23 Contributions to Federal Candidates/Committees 10000.00 0.00 and Other Political Committees... 24. Independent Expenditures (use Schedule E).... Coordinated Party Expenditures (52 U.S.C. § 30116(d)) (use Schedule F).... 1000.00 162044.08 25. 0.00 0.00 26. Loan Repayments Made..... 0.00 0.00 Loans Made..... Refunds of Contributions To: 0.00 27. 28. 0.00 Individuals/Persons Other (a) Than Political Committees 0.00 0.00 (b) Political Party Committees ..... 0.00 0.00 Other Political Committees (C) (such as PACs)..... 0.00 0.00 Total Contribution Refunds (d) (add Lines 28(a), (b), and (c))...... 0.00 0.00 29. Other Disbursements (Including 0.00 Non-Federal Donations)..... 0.00 30. Federal Election Activity (52 U.S.C. § 30101(20)) (a) Allocated Federal Election Activity (from Schedule H6) (i) Federal Share .... 0.00 0.00 (ii) "Levin" Share..... 0.00 0.00 (b) Federal Election Activity Paid Entirely With Federal Funds ..... 0.00 0.00 Total Federal Election Activity (add (C) Lines 30(a)(i), 30(a)(ii) and 30(b)) ..... 0.00 0.00 31. Total Disbursements (add Lines 21(c), 22, 23, 24, 25, 26, 27, 28(d), 29 and 30(c)).. 2526.64 179765.72 32. Total Federal Disbursements (subtract Line 21(a)(ii) and Line 30(a)(ii) from Line 31)..... 2526.64 179765.72

### DETAILED SUMMARY PAGE

of Disbursements

COLUMN A

**Total This Period** 

### III. Net Contributions/ Operating Expenditures

33.	Total Contributions (other than loans)
	(from Line 11(d), page 3)
34.	Total Contribution Refunds
	(from Line 28(d))
35.	Net Contributions (other than loans)
	(subtract Line 34 from Line 33)
36.	Total Federal Operating Expenditures
	(add Line 21(a)(i) and Line 21(b))
37.	Offsets to Operating Expenditures
	(from Line 15, page 3)
38.	Net Operating Expenditures

(subtract Line 37 from Line 36) .....

							26.00
		-7			-7		1 /85 1
							0.00
		- <b>J</b>			-7-		
							26.00
		7			- 7		
							4500.04
							1526.64
<u></u>		-7			-7		1526.64
÷	-	-7	+	÷	-1	÷	
Ľ.	÷	-7-	ì		-7-		
Ë	+		+	+		+	

							185623.15
_	-	1	7		1	7	
		1					0.00
_		1	-	-		7	0.00
							185623.15
		1	-	1	1	-	1 48 1
				1			
			-				7721.64

COLUMN B

Calendar Year-to-Date

				0.00
	-7		-7	
				7721.64



# SCHEDULE A (FEC Form 3X) ITEMIZED RECEIPTS

Use separate schedule(s) for each category of the

FOR LINE NUMBER:

(check only one)

PAGE 6 OF

45

	EIVIZED RECEIPTS		Detailed Summary Pag		X	11a		11b	11c		12		
				J-		13		14	15		16	1	7
Ar or	y information copied from such Reports and Stat for commercial purposes, other than using the n	tements ma ame and a	ay not be sold or used by address of any political co	/ any pers mmittee to	on fo	or the icit cor	purp ntrib	oose of utions	f soliciting from such	COI 1 CO	ntributi mmitte	ions e.	
$\backslash$	NAME OF COMMITTEE (In Full)												
	COURAGEOUS CONSERVATIV	ES PA	C										
Α.	Full Name of Individual (Last, First, Middle Initial Ekstrom, Christopher, , ,	l) or Full C	organization Name			ate of	Re	ceipt					
	Mailing Address 25 Highland Park Village Suite 100	Chata	Zin Code			10 <sup>M</sup>	/	D 14		20	024	Y	
	City Dallas	State TX	Zip Code 75205		A				<b>SA11AI.</b> Receipt th				
	FEC ID number of contributing federal political committee.	С				_				_	25.0	0	
	Name of Employer (for Individual) Self-employed		upation (for Individual) estor			Me	emo	Item					
	Receipt For:         Primary       General         Other (specify) ▼	Aggregate	Year-to-Date ▼ 622.	15									
В.	Full Name of Individual (Last, First, Middle Initial	l) or Full C	organization Name			Date of	Re	ceipt					
	Mailing Address					M = M	/	D	D / Y	Y	Y	Y	
	City	State	Zip Code		A	mount	of	Each F	Receipt th	is P	eriod		
	FEC ID number of contributing federal political committee.	С			ļ					_			
	Name of Employer (for Individual)	Occ	upation (for Individual)			Me	emo	Item					
	Receipt For: Primary General Other (specify) ▼	Aggregate	Year-to-Date ▼		-								
с.	Full Name of Individual (Last, First, Middle Initial	l) or Full C	Organization Name			Date of	Re	ceipt					
	Mailing Address					M M	/	D	D / Y	Y	Y	Y	
	City	State	Zip Code			mount	of	Fach F	Receipt th	is F	Period		
	FEC ID number of contributing federal political committee.	С						,	,				
	Name of Employer (for Individual)	Occ	upation (for Individual)			Me	emo	Item					
	Receipt For: Primary General Other (specify)	Aggregate	Year-to-Date ▼		-								
s	UBTOTAL of Receipts This Page (optional)			····· ►	[			, .			25.0	0	]
т	OTAL This Period (last page this line number on	ly)		····· ►	ĺ			<b>,</b> ,			25.0		

SC	HEDULE B (FEC Form	3X)			F	OR L	INE	NUMBER:				PA	GE	7 OF	45				
ITE	EMIZED DISBURSEMENT	S	for each	arate schedule(s) category of the Summary Page		heck	only	one) 22 28b		23 28c		26 29		27 30b					
Any or 1	y information copied from such Report for commercial purposes, other than u	s and State sing the na	ements may r me and addr	not be sold or use ress of any politica	ed by al con	any nmitte	perso ee to	on for the solicit co	pur ntrik	pose o outions	of s s fro	olicitin m suc	g co ch co	ntributio	ns e.				
	NAME OF COMMITTEE (In Full)																		
	COURAGEOUS CONSER	RVATIV	ES PAC																
Α.	Full Name (Last, First, Middle Initial)						Date of Disbursement												
	Political Consulting							MM	/	D	D	/ Y	Y	YY	1				
	Mailing Address 21218 St Andrews Blv #704	d.						10	5	0	)3		20	)24					
	City Boca Raton		State FL	Zip Code 33433				FEC ld	enti	ficatio	n N	umber							
	Purpose of Disbursement		ΓL	33433				C											
	Issue based Geocaching						Ш												
i	Candidate Name			Cate	egory	/	Transaction ID : SB21B.6280 Amount of Each Disbursement this Period												
					ype	,													
	Office Sought: House	Disburse	ement For:					1500.00											
	Senate President		Primary Other (spec	General															
	State: District:	Other (spec	City) 🔻	Memo Item															
	Full Name (Last, First, Middle Initial)																		
B.					Date of	f Di	sburse	eme	nt										
									M = M / D = D / Y = Y = Y										
	Mailing Address																		
	City		State						FEC Identification Number										
Ī	Purpose of Disbursement																		
-	Candidate Name								Amount of Each Disbursement this Period										
			Category Type					Amoun											
	Office Sought: House	Disburse	ement For:	I															
	Senate		Primary	General															
	State: District:		Other (spec	Other (specify)						Memo Item									
	Full Name (Last, First, Middle Initial)																		
C.								Date of	f Di	sburse	eme	nt							
								M M	/	D	D	/ Y	Y	YY	1				
	Mailing Address																		
	City	State	Zip Code				FEC Id	FEC Identification Number											
	Purpose of Disbursement			_	_		C												
	Candidate Name		Category/ Type					Amount of Each Disbursement this Period											
	Office Sought: House	ement For:																	
	Senate		Primary	General				Memo Item											
	State: District:		Other (spec	city) 🔻															
								_		_					_				
รเ	JBTOTAL of Disbursements This Page	e (optional)												1500.00					
	-													1500.00					
т	<b>DTAL</b> This Period (last page this line r	number only	/)											1500.00					

# $Def's \overset{\text{Ferry Let B}}{AppX} \overset{\text{(Form 3)}}{34} \overset{\text{(Form 3)}}{34}$

## SCHEDULE E (FEC Form 3X) ITEMIZED INDEPENDENT EXPENDITURES

ITEMIZED INDEPENDENT EXPENDITURES				PAGE 45 OF 45 FOR LINE 24 OF FORM 3X		
NAME OF COMMITTEE (In Full)				FEC IDENTIFICATION NUMBER ▼		
COURAGEOUS CONSERVATIVES	PAC			C C00587022		
Check if 24-hour report 48-hour report	New rep	oort Amends repo	ort filed or			
Full Name of Payee		Memo	ltem [	Date of Public Distribution/Dissemination		
American Campaign Services, LLC				10 / D D / Y Y Y Y 10 16 2024		
Mailing Address 5830 E 2nd St						
Ste 8			F	Amount		
City	State	Zip Code		1000.00		
Casper	WY	82609		Transaction ID : SE.6278 Date of Disbursement or Obligation		
Purpose of Expenditure Email Voter Contact		Category/ Type		10 / D D / Y Y Y Y 2024		
Name of Federal Candidate:		Support	Office S	Sought: House District: 00		
TRUMP, DONALD J, , ,		Oppose	X P	President Senate State:		
Calendar Year-To-Date Per Election for Office Sought		1000.00	Disburs 2024	ement For:		
Full Name of Payee		Memo	Item [	Date of Public Distribution/Dissemination		
				M M / D D / Y Y Y Y		
Mailing Address						
			A	Amount		
City	State	Zip Code				
		P		Dete of Diskursement or Obligation		
Purpose of Expenditure		Category/	<u> </u>	Date of Disbursement or Obligation		
		Type				
Name of Federal Candidate:		Support	Office S	Sought: House District:		
		Oppose	P	President Senate State:		
Calendar Year-To-Date			Disburs	ement For: Primary General		
Per Election for Office Sought	7 7		[	Other (specify)		
(a) SUBTOTAL of Itemized Independent Expenditures			•	1000.00		
(b) SUBTOTAL of Unitemized Independent Expenditu	res		•			
(c) TOTAL Independent Expenditures			•	1000.00		
Under penalty of perjury I certify that the independe with, or at the request or suggestion of, any candida party committee) any political party committee or its	ate or authorized					
Denn, Stella, , ,			M			
Signature		Date	e 10	24 2024		
			Def	FEC Schedule E (Form 3X) Rev. 05/2016		

### JERAD NAJVAR, CAMPAIGN FINANCE EXPERIENCE

Jerad Wayne Najvar CHALMERS, ADAMS, BACKER & KAUFMANN LLC 2180 North Loop West, Ste. 255 Houston, TX 77018 Cell: (281) 684-1227 jnajvar@chalmersadams.com

### Brief practice background as relevant to campaign finance/First Amendment issues:

Najvar graduated *cum laude* from University of Houston Law Center in May 2008. From 2008-2009, he worked for a local political consultant managing campaigns in Harris County (County and Appellate judicial races, state legislative races, statewide races, and other local races), gaining practical insight into campaign finance laws and reporting requirements. He worked briefly at a Houston firm thereafter in insurance defense (Edison, McDowell & Hetherington, now McDowell Hetherington), before establishing a solo practice in 2011 focused in political compliance and election litigation. The practice was initially focused nearly completely in such matters, but has broadened over the years to include litigation in various constitutional issues (Fourth Amendment; due process; separation of powers) and administrative law. In mid-2024, Najvar joined Chalmers, Adams, Backer & Kaufmann LLC as member, as the firm's first attorney in Texas. This summary will first highlight the campaign finance matters.

Since 2011, Najvar has represented clients including candidates, prospective candidates, political party committees, politically-active nonprofits, and individuals, in enforcement actions in state and local regulatory bodies, including the Texas Ethics Commission, Federal Election Commission, and local entities, as well as providing compliance support for reporting obligations (initiating campaigns and navigating the regulatory environment). This is ongoing.

Since 2012, Najvar has aggressively litigated challenges to local, state, and federal campaign finance restrictions, including in the following reported matters:

- *McCutcheon v. Federal Election Commission*, 572 U.S. 185 (2014) (U.S. Supreme Court held the federal aggregate contribution limits facially unconstitutional)
  - *McCutcheon* is the first case in which the Supreme Court has found a federal limit on campaign contributions to violate the First Amendment.
  - As a solo attorney at the time focusing in campaign finance compliance, Najvar identified the basic argument that, following the Court's reiteration in

Citizens United of the limited nature of the government's interest in restricting campaign finances—limited to actual *quid pro quo* corruption or its appearance—a challenge to the federal aggregate limits was particularly ripe, despite the fact that such limits had been on the books since 1974's FECA and were upheld in *Buckley* in 1976). He pitched the argument to Dan Backer and Stephen Hoersting (fellow campaign finance litigators), who agreed the argument was promising, and the three of them initiated the case with Shaun McCutcheon.

- Najvar served as co-counsel from filing in the three-judge district court in D.C. through the D.C. Circuit Court of Appeals and the Supreme Court.
- *Catholic Leadership Coal. of Tex. v. Reisman*, 764 F.3d 409 (5th Cir. 2014) (holding a Texas statute, requiring new political committees to wait 60 days and collect contributions from ten different persons before spending more than \$500, to be facially unconstitutional under the First Amendment (reversing the trial court)).
  - Najvar represented plaintiffs from initiation in trial court through the Fifth Circuit, including oral argument.
  - Ten years ago, there was very little Fifth Circuit precedent dealing with challenges to campaign finance restrictions. *Catholic Leadership* therefore established much of the framework interpreting Texas's relevant campaign finance definitions, recognizing burdens from temporal restrictions on campaign finance activity, both as to contributions and expenditures, and justiciability issues.
- Zimmerman v. City of Austin, Tex., 881 F.3d 378 (5th Cir. 2018), reh'g denied, 888 F.3d 163, cert. denied, 139 S. Ct. 639 (affirming judgement against the City, after a twoday bench trial, striking down two provisions of the City campaign finance code which had restricted fundraising by city candidates to the last six months before election day and then required the disgorgement of campaign funds between elections).
  - Najvar represented Plaintiff Zimmerman from initiation in trial court through the Fifth Circuit, including oral argument. Also represented Zimmerman before the Austin Ethics Review Commission in a related citizen complaint.
- *Gordon v. City of Houston, Tex.*, 79 F. Supp. 3d 676 (S.D. Tex. 2015) (J. Sim Lake) (granting a preliminary and permanent injunction from enforcing a charter provision that limited city candidate fundraising to the last nine months before election day).

- Najvar represented Plaintiff from initiation through judgment, including contested hearings.
- *Virden v. City of Austin*, 127 F.4th 960 (5th Cir. 2025) (affirming judgment that Austin's new, one-year fundraising window, enacted after the six-month window was declared unconstitutional in *Zimmerman*, violated the First Amendment for the same reasons).
  - Najvar represented Plaintiffs (Virden and a contributor) from initiation through the Fifth Circuit, including oral argument in August 2024.
- In 2025, Najvar and Chalmers Adams colleagues represented a nationally-active nonprofit organization in defense of a citizen complaint under Arizona's new "Citizens Right to Know" Act. This Act aims to require infinite "look through" disclosure (purportedly requiring disclosure of the "true source" of monies regardless of how many organizations the funds passed through on their way to the ultimate recipient who then spends money in AZ elections). Such legislation is the centerpiece of current reform efforts by organizations supporting more robust disclosure, but it raises significant new constitutional and compliance concerns. We filed a 50+ page brief outlining these concerns and raising other defenses; the regulatory agency dismissed the complaint without reaching the constitutional issues.
- Amicus brief filed Feb. 28, 2025 in Arizona Supreme Court on behalf of Make Liberty Win and Young Americans for Liberty in *Ctr. for Arizona Policy v. Arizona Sec'y of State*, CV-24-0295-PR, supporting petitioner's argument that the Citizens Right to Know Act violates free speech and association guarantees. Petition for review remains pending.

Other litigation experience includes:

- *Cervini et al v. Cisneros et al.*, No. 21-cv-565-RP (W.D. Tex., Austin Div.) (securing unanimous jury verdict in Sept. 2020 after two-week trial against claims under Civil Rights Act of 1871 related to campaign activity in 2020).
- *Bidi Vapor LLC v. FDA*, 2022 WL 3594073 (11th Cir. 2022), in which the Eleventh Circuit held that FDA had arbitrarily denied applications for marketing authorization sought by four small vapor manufacturers for bottled e-liquids, in violation of the APA
  - Najvar argued this case in the Eleventh Circuit in 2022, and has argued the same issue in oral arguments in several other circuits from 2021-2023, including the Eighth, Ninth, Tenth, and D.C. Circuits (all of which ruled for the

FDA, splitting from the Eleventh and Fifth Circuits), and secured a judgment from the Fifth Circuit which is now pending the FDA's petition for certiorari in the Supreme Court.

- *Pool v. City of Houston*, 978 F.3d 307 (5th Cir. 2020), in which the Fifth Circuit reinstated constitutional claims against a Houston charter provision over the City's standing and mootness objections (reversing the trial court), later resulting in a declaratory judgment for NLF's clients;
- Davidson v. City of Stafford, Tex., 848 F.3d 384 (5th Cir. 2017), in which the Fifth Circuit held that two police officers were not entitled to qualified immunity for arresting Davidson, in violation of his Fourth Amendment rights, as he was protesting and praying outside an abortion clinic (reversing the trial court). The Circuit Court remanded for trial against the officers, and directed entry of a declaratory judgment against the City for chilling Davidson's speech in violation of the First Amendment.
- Villarreal v. Texas Southern Univ., 570 S.W.3d 916 (Tex. App.—Houston [1st Dist.] 2018), in which the court of appeals revived NLF's client's due process claim challenging dismissal from law school based on the administration's alleged badfaith cover up of a law school exam grading controversy (reversing the trial court). The Supreme Court granted TSU's petition for review, and reversed the judgment, dismissing the claims, following oral argument (Najvar argued for Villareal in Texas Supreme Court).
- *Pool, et al. v. City of Houston, Tex.*, 4:19-cv-02236 (S.D. Tex. 2019), in which the federal district court granted an emergency temporary restraining order, prohibiting the City from enforcing a charter provision requiring anyone circulating initiative petitions to be a registered voter of the City.
- *Rivera v. Lopez*, 13-14-00581-CV (Tex. App.—Corpus Christi May 14, 2014), in which the Texas Thirteenth Court of Appeals affirmed a judgment for NLF's client after a four-day trial in Hidalgo County, proving thirty illegal votes cast in a council race and ordering a new election.

# Automated Certificate of eService

This automated certificate of service was created by the efiling system. The filer served this document via email generated by the efiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Jerad Najvar on behalf of Jerad Najvar Bar No. 24068079 jnajvar@chalmersadams.com Envelope ID: 99483284 Filing Code Description: Motion (No Fee) Filing Description: Motion (No Fee) Status as of 4/9/2025 4:59 PM CST

Associated Case Party: Pat Curry

Name	BarNumber	Email	TimestampSubmitted	Status
Scott Gray		scott@guestandgray.com	4/9/2025 4:43:28 PM	SENT
Elizabeth Alvarez		alvarez@guestandgray.com	4/9/2025 4:43:28 PM	SENT
Amy Miller		amy@guestandgray.com	4/9/2025 4:43:28 PM	SENT

Associated Case Party: Curry for Texas

Name	BarNumber	Email	TimestampSubmitted	Status
Scott Gray		scott@guestandgray.com	4/9/2025 4:43:28 PM	SENT
Elizabeth Alvarez		alvarez@guestandgray.com	4/9/2025 4:43:28 PM	SENT
Amy Miller		amy@guestandgray.com	4/9/2025 4:43:28 PM	SENT

# **Case Contacts**

Name	BarNumber	Email	TimestampSubmitted	Status
Jerad Najvar	24068079	jnajvar@chalmersadams.com	4/9/2025 4:43:28 PM	SENT
Gail Brand		gail@guestandgray.com	4/9/2025 4:43:28 PM	SENT
Jonathan Alvarez		jonathan.alvarez@guestandgray.com	4/9/2025 4:43:28 PM	SENT
Dan Backer		dbacker@chalmersadams.com	4/9/2025 4:43:28 PM	SENT