

# CREW | citizens for responsibility and ethics in washington

December 17, 2015

Honorable Johnny Isakson, Chair  
Honorable Barbara Boxer, Vice Chair  
Senate Select Committee on Ethics  
Hart Building, Room 220  
Washington, DC 20510

## By Facsimile (202-224-7416) and First Class Mail

Re: Request for Investigation of Senator Marco Rubio (R-FL)

Dear Chairman Isakson and Vice Chairwoman Boxer:

Citizens for Responsibility and Ethics in Washington ("CREW") respectfully requests that the Senate Select Committee on Ethics investigate whether Sen. Marco Rubio (R-FL) violated Senate rules by converting campaign funds to personal use. According to a recent news report, Sen. Rubio used money contributed to his leadership political action committee to pay a writer to help with his memoir, for which Sen. Rubio received an \$800,000 advance.<sup>1</sup>

Since 2011, Sen. Rubio has been the sponsor of Reclaim America PAC, a leadership PAC.<sup>2</sup> Leadership PACs are a type of political committee that are "directly or indirectly established, financed, maintained or controlled by a federal candidate or officeholder."<sup>3</sup> Between May 14 and October 3, 2012, Reclaim America PAC paid Mark Salter a total of \$20,000, all purportedly for "strategic consulting."<sup>4</sup>

Sen. Rubio published his memoir, *An American Son*, in June 2012.<sup>5</sup> Sen. Rubio was the only named author, but he received assistance from Mr. Salter, who previously coauthored numerous books with Sen. John McCain (R-AZ) and allegedly wrote an anonymously-published novel about President Obama titled *O: A Presidential Novel*.<sup>6</sup> The extent of Mr. Salter's help with the memoir is not clear. A 2013 news report stated "Rubio used his PAC to pay \$20,000 to Mark Salter, a strategist who helped run John McCain's 2008 presidential campaign, for help writing a memoir," suggesting Mr. Salter played a significant role.<sup>7</sup> At a minimum, Sen. Rubio

<sup>1</sup> S.V. D  te, Did Marco Rubio's Donors Fund a Book That Put \$800,000 Into Rubio's Pocket?, *National Journal*, December 13, 2015 (attached as Exhibit A).

<sup>2</sup> Reclaim America PAC, FEC Form 1, Statement of Organization, August 2, 2011 (attached as Exhibit B).

<sup>3</sup> 11 C.F.R.   100.5(e)(6).

<sup>4</sup> Reclaim America PAC, FEC Form 3X, Reports of Receipts and Disbursements, June 20, 2012, July 20, 2012, October 19, 2012, and October 25, 2012 (excerpts attached as Exhibit C).

<sup>5</sup> Alex Leary, Sen. Marco Rubio's Autobiography Presents Obsessive Politician With Compelling Family Story, *Tampa Bay Times*, June 18, 2012 (attached as Exhibit D).

<sup>6</sup> Howard Fineman, Mark Salter: McCain's Closest Aide, *Newsweek*, July 18, 2008, available at <http://www.newsweek.com/mark-salter-mccains-closest-aide-92769>; Mark Halperin, O, Mark Salter!!, *Time*, January 27, 2011, available at <http://thepage.time.com/2011/01/27/o-mark-salter/#ixzz1CFCnf8vY>.

<sup>7</sup> Alex Leary and Adam C. Smith, Building the Marco Rubio Brand, *Tampa Bay Times*, February 16, 2013 (attached as Exhibit E).

wrote in *An American Son*'s acknowledgments he was "grateful to Mark Salter for helping me organize and revise the manuscript on a tight schedule."<sup>8</sup>

It is also unclear if the \$20,000 Sen. Rubio's leadership PAC paid Mr. Salter was for work on the book. The payments were made around the time Mr. Salter was helping Sen. Rubio at least organize and revise the memoir, and the only other payment to Mr. Salter by either Reclaim America PAC or any of Sen. Rubio's campaign committees was made in January 2015, years after the book was published.<sup>9</sup> In response to recent questions from the *National Journal*, however, Mr. Salter claimed he was paid for his work on Sen. Rubio's memoir directly by the publisher, and the \$20,000 was for "projects unrelated to the book."<sup>10</sup>

According to Sen. Rubio's personal financial disclosure forms, he was paid an \$800,000 advance for the book by the publisher.<sup>11</sup>

Under Senate Rule 38, "[n]o contribution (as defined in section 301(e) of the Federal Election Campaign Act of 1971 (2 U.S.C. 431)) shall be converted to the personal use of any Member or any former Member." As the Senate Ethics Manual explains, "the Senate's antipathy to the conversion of campaign funds to personal use was established even before the enactment of the FECA or the rule."<sup>12</sup> Pointing to the censure of Sen. Thomas J. Dodd (D-CT) for using campaign funds for his personal benefit, the Ethics Manual notes that while Sen. Dodd's conduct was not, at that time, illegal, the Senate nevertheless deemed it "contrary to accepted morals . . . [and] the public trust expected of a Senator."<sup>13</sup>

The FECA also prohibits the conversion of campaign funds to personal use.<sup>14</sup> The two prohibitions, however, are separate. Limits on enforcing the statutory prohibition do not apply to the Senate rule, and while the FECA and Federal Election Commission ("FEC") regulations implementing it can provide guidance for interpreting the Senate rule, that guidance is not binding on the Senate. In particular, while FECA prohibits the conversion of contributions "accepted by a candidate" or a candidate's campaign committee, there is no corresponding provision applying the ban to leadership PACs.<sup>15</sup> By contrast, Senate Rule 38, on its face, applies to all contributions under the FECA.

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<sup>8</sup> Marco Rubio, *An American Son* 305 (2012) (excerpts attached as Exhibit F).

<sup>9</sup> Reclaim America PAC, FEC Form 3X, FEC Form 3X, Reports of Receipts and Disbursements, July 31, 2015 (attached as Exhibit G).

<sup>10</sup> D  te, *National Journal*, Dec. 13, 2015.

<sup>11</sup> *Id.*

<sup>12</sup> Senate Select Committee on Ethics, Senate Ethics Manual, at 154-55 (108th Cong., 1st Sess. 2003 ed.).

<sup>13</sup> *Id.*

<sup>14</sup> Senate Rule 38.2; 52 U.S.C.    30114(b).

<sup>15</sup> 52 U.S.C.    30114(a); Federal Election Commission, Legislative Recommendations of the Federal Election Commission 2013, at 12 (Dec. 17, 2013), available at <http://www.fec.gov/law/legrec2013.pdf>.

Senate Rule 38, therefore, appears to apply to Reclaim America PAC's payments to Mr. Salter. Money given to leadership PACs like Reclaim America PAC are "contributions" under the FECA, defined as anything of value given by any person "for the purpose of influencing any election for Federal office."<sup>16</sup> In fact, Reclaim America PAC reported receiving \$1.16 million in contributions in 2012, which constituted nearly all of its receipts.<sup>17</sup>

If Reclaim America PAC's payments to Mr. Salter were for his work on the book, they likely would have been converted to Sen. Rubio's personal use. Neither Senate rules nor the Ethics Manual provide relevant authority on what constitutes a personal use. FEC guidance, however, suggests providing a senator assistance with a book is a personal use. For example, expenses associated with marketing a book written by a member of Congress that is published by a commercial publisher and for which royalties are paid would constitute a personal use if paid using campaign funds.<sup>18</sup> The FEC similarly found a payment to the co-author of a senator's book to be a personal use when made by the senator's campaign committee.<sup>19</sup>

Further, Sen. Rubio may have engaged in improper conduct that reflects unfavorably upon the Senate. The Ethics Manual provides that "[c]ertain conduct has been deemed by the Senate in prior cases to be unethical and improper even though such conduct may not necessarily have violated any written law, or Senate rule or regulation. Such conduct has been characterized as 'improper conduct which may reflect upon the Senate.'"<sup>20</sup> This rule is intended to protect the integrity and reputation of the Senate as a whole.<sup>21</sup> The Ethics Manual explains that "improper conduct" is given meaning by considering "generally accepted standards of conduct, the letter and spirit of laws and Rules . . ."<sup>22</sup> The Senate may discipline a member for any misconduct that reflects unfavorably upon the Senate as a whole. As the censure of Sen. Dodd demonstrates, converting campaign contributions to personal use would reflect unfavorably upon the Senate.

The allegations that Sen. Rubio may have converted contributions to his leadership PAC to personal use by paying Mr. Salter to help with his memoir warrant investigation by the committee. Campaign contributions should be used for their intended purpose – to further

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<sup>16</sup> 52 U.S.C. § 30101(8)(A)(i). Leadership PACs also are a type of political committee, defined in part to include any group that receives more than \$1,000 in contributions in a year. 52 U.S.C. § 30101(4)(A).

<sup>17</sup> Reclaim America PAC, FEC Form 3X, Reports of Receipts and Disbursements, January 31, 2013 (excerpts attached as Exhibit H).

<sup>18</sup> Advisory Opinion 2006-7 (Hayworth), at 3; Advisory Opinion 2006-18 (Granger), at 3; Advisory Opinion 2011-2 (Brown), at 6; 2014-6 (Ryan), at 7.

<sup>19</sup> Advisory Opinion 2008-17 (Missourians for Kit Bond), at 3. Due to slight differences in the language of FEC regulations applying to payments by campaign committees and third parties, the FEC concluded the same payment would not be a personal use if made by the senator's leadership PAC, but, as noted, the FECA's ban and FEC regulations implementing it are distinct from the Senate rule.

<sup>20</sup> Improper Conduct Reflecting Upon the Senate and General Principles of Public Service, *Senate Ethics Manual*, Appendix E, at 432 (citation omitted).

<sup>21</sup> *Id.*

<sup>22</sup> *Id.* at 433 & n.10.

Hon. Johnny Isakson  
Hon. Barbara Boxer  
December 17, 2015  
Page 4

political campaigns – and not diverted to the personal use of a senator. Thank you for your prompt attention to this matter.

Sincerely,



Noah Bookbinder  
Executive Director  
Citizens for Responsibility and Ethics in Washington

Encls.

# **EXHIBIT A**

www.nationaljournal.com

# Did Marco Rubio's Donors Fund a Book That Put \$800,000 Into Rubio's Pocket?

One way or the other, the campaign knows, but it won't say.

S.V. Dáte

@SVDATE

🕒 December 13, 2015

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Marco Rubio didn't intend to write a mystery when he sat down to pen his life's story, but that's what *An American Son* has turned into—or at least the tale of its writing has.

Here's what's known:

- 1) In 2012, Marco Rubio's "leadership PAC" paid \$20,000 to Mark Salter, Sen. John McCain's longtime coauthor. It says so in the group's filings with the Federal Election Commission.
- 2) Salter helped the Florida senator write his book. Rubio thanks him for this in the book's acknowledgements: "I am grateful to Mark Salter for helping me organize and revise the manuscript on a tight schedule."
- 3) Rubio in 2012 netted an \$800,000 advance for the book, which he reported as outside income on his Senate financial disclosure form for that year ([http://pfds.opensecrets.org/N00030612\\_2012.pdf](http://pfds.opensecrets.org/N00030612_2012.pdf)).

And here's what is not known, what the campaign has thus far declined to discuss, and what could land Rubio on the wrong side of Senate Ethics rules:

- 4) Was the \$20,000 from Rubio's Reclaim America PAC to Salter for his work on the book?

For his part, Salter says no. In emails to me last month, he said he was paid for his work on the book directly by the publisher, Penguin, through its Sentinel imprint. Salter said the \$20,000 from Rubio's PAC was for "projects unrelated to the book." He declined to specify what that work was, and suggested asking Rubio's campaign.

The *Tampa Bay Times*, though, says the answer is yes. In 2013, toward the end of a [lengthy article about how Rubio built his brand](http://www.tampabay.com/news/politics/stateroundup/building-the-marco-rubio-brand/1275513) (<http://www.tampabay.com/news/politics/stateroundup/building-the-marco-rubio-brand/1275513>), the paper wrote: "Rubio used his PAC to pay \$20,000 to Mark Salter, a strategist who helped run John McCain's 2008 presidential campaign, for help writing a memoir." Rubio's aides, who have a reputation of demanding corrections for even the smallest perceived errors, never complained to the paper.

And for its part, Rubio's presidential campaign has been unwilling to clear up the discrepancy. When I first asked Rubio's campaign about Salter and his payments on Nov. 3, spokesman Alex Conant replied: "I'll refer you to his book's acknowledgments." Six weeks and four follow-up queries later, Conant still has not answered what exactly that means.

Why does a \$20,000 ghostwriting fee from three years ago matter? Because if Rubio used leadership PAC money to help produce a book that put money in his own pocket, he may have violated Senate Ethics rules—not something a presidential candidate in the heat of primary season wants to be dealing with.

It appears unlikely that even if they were for the book, the leadership PAC's payments to Salter violated any laws. While it is illegal for a candidate to benefit personally from an actual campaign committee for a particular office, there appears to be no election-law prohibition against using "leadership PAC" money in ways that personally benefit candidates. The committees are lightly regulated, and are often used by would-be presidential candidates to travel the country, pay consultants, and otherwise lay the groundwork for a presidential run before formally starting a campaign. (For the 2016 election cycle, New Jersey Gov. Chris Christie, Sen. Ted Cruz of Texas, former Florida Gov. Jeb Bush, Maryland Gov. Martin O'Malley, and even Sen. Bernie Sanders of Vermont, among others, had leadership PACs.)

Robert Maguire of the nonpartisan Center for Responsive Politics said that even if Rubio's payments to Salter were for his help with the book, they were probably legal from an election-law standpoint. "The rules of what you can and can't do for leadership PACs is pretty much wide open," he said. "This doesn't strike me as even the most egregious."

Rubio's problem is that he is a sitting senator, and that Senate Rule XXXVIII, paragraph 2, states: "No (political) contribution ... shall be converted to the personal use of any member or any former member."

The Campaign Legal Center's Paul Ryan (*not* the current House speaker—different Paul Ryan) said that Senate Ethics rule could well be interpreted as banning the use of leadership PAC money on a book that winds up personally profiting a member. "Then it becomes a question of, well, has Senate Ethics ever enforced this?" Ryan said.

Just seven weeks shy of the Iowa caucuses, Rubio worst-case scenario isn't what the Ethics Committee might do to him following a lengthy investigation, given that he's already made it clear he plans to leave the chamber next year either way. It's what his GOP rivals might do with this new tidbit in those seven weeks, given Rubio's already well-documented problems with money (<http://www.nationaljournal.com/s/125800/marco-rubio-is-just-like-average-american-except-all-really-big-paychecks?mref=landing-list-bottom>).

*We will update this story if Rubio or his campaign does detail what that \$20,000 to Salter in 2012 was for.*



## **EXHIBIT B**

**FEC  
FORM 1**

**STATEMENT OF  
ORGANIZATION**

(See instructions)

RECEIVED

2011 AUG -3 AM 11:08

Office use only

1. NAME OF COMMITTEE (in full) ☐ (Check if name is changed) Example: If typing, type over the lines

FEC MAIL CENTER  
12FE4M5

Reclaim America PAC

ADDRESS (number and street)

228 S. Washington St., Ste. 115

(Check if address is changed)

Alexandria

VA

22314

CITY

STATE

ZIP CODE

COMMITTEE'S E-MAIL ADDRESS (Please provide only one e-mail address)

(Check if address is changed)

llisker@hdafe.com

COMMITTEE'S WEB PAGE ADDRESS (URL)

(Check if address is changed)

2. DATE

MM / DD / YYYY  
08 / 02 / 2011

3. FEC IDENTIFICATION NUMBER

C

4. IS THIS STATEMENT ☒ NEW (N) OR ☐ AMENDED (A)

I certify that I have examined this Statement and to the best of my knowledge and belief it is true, correct and complete

Type or Print Name of Treasurer Lisa Lisker

Signature of Treasurer *Lisa Lisker* Electronically Filed by Lisa Lisker

Date

MM / DD / YYYY  
08 / 02 / 2011

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. §437g.

ANY CHANGE IN INFORMATION SHOULD BE REPORTED WITHIN 10 DAYS

Office Use Only				
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For further information contact:  
Federal Election Commission  
Toll Free 800-424-9530  
Local 202-694-1100

**FEC FORM 1**  
(Revised 02/2009)

11030644861

## 5. TYPE OF COMMITTEE (Check One)

## Candidate Committee:

- (a) ☐ This committee is a principal campaign committee. (Complete the candidate information below.)
- (b) ☐ This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)

Name of  
CandidateCandidate  
Party AffiliationOffice  
Sought:☐

House

☐

Senate

☐

President

State

District

- (c) ☐ This committee supports/opposes only one candidate, and is NOT an authorized committee.

Name of  
Candidate

## Party Committee:

- (d) ☐ This committee is a ☐ (National, State  
(or subordinate) committee of the ☐ (Democratic,  
Republican, etc.) Party.

## Political Action Committee (PAC):

- (e) ☐ This committee is a separate segregated fund. (Identify connected organization on line 6.) Its connected organization is a:
- ☐ Corporation ☐ Corporation w/o Capital Stock ☐ Labor Organization
- ☐ Membership Organization ☐ Trade Association ☐ Cooperative
- (f) ☐ In addition, this committee is a Lobbyist/Registrant PAC.
- ☒ This committee supports/opposes more than one Federal candidate, and is NOT a separate segregated fund or party committee. (i.e., nonconnected committee)
- ☐ In addition, this committee is a Lobbyist/Registrant PAC.
- ☒ In addition, this committee is a Leadership PAC. (Identify sponsor on line 6.)

## Joint Fundraising Representative:

- (g) ☐ This committee collects contributions, pays fundraising expenses and disburses net proceeds for two or more political committees/organizations, at least one of which is an authorized committee of a federal candidate.
- (h) ☐ This committee collects contributions, pays fundraising expenses and disburses net proceeds for two or more political committees/organizations, none of which is an authorized committee of a federal candidate.

## Committees Participating in Joint Fundraiser

- |    |                      |               |                      |
|----|----------------------|---------------|----------------------|
| 1. | <input type="text"/> | FEC ID number | <input type="text"/> |
| 2. | <input type="text"/> | FEC ID number | <input type="text"/> |
| 3. | <input type="text"/> | FEC ID number | <input type="text"/> |
| 4. | <input type="text"/> | FEC ID number | <input type="text"/> |

11030644862

Write or Type Committee Name

Reclaim America PAC

## 6. Name of Any Connected Organization, Affiliated Committee, Joint Fundraising Representative, or Leadership PAC Sponsor

MARCO RUBIO

Mailing Address

2030 SOUTH DOUGLAS ROAD

CORAL GABLES

FL

33134

CITY ▲

STATE ▲

ZIP CODE ▲

Relationship:



Connected Organization



Affiliated Committee



Joint Fundraising Representative



Leadership PAC Sponsor

## 7. Custodian of Records: Identify by name, address, (phone number -- optional), and position of the person in possession of Committee books and records.

Full Name

Lisa Lisker

Mailing Address

228 S. Washington St., Ste. 115

Alexandria

VA

22314

Title or Position ▼

CITY ▲

STATE ▲

ZIP CODE ▲

Treasurer

Telephone number 703 - 549 - 7705

## 8. Treasurer: List the name and address (phone number -- optional) of the treasurer of the committee; and the name and address of any designated agent (e.g., assistant treasurer).

Full Name

of Treasurer

Lisa Lisker

Mailing Address

228 S. Washington St., Ste. 115

Alexandria

VA

22314

Title or Position ▼

CITY ▲

STATE ▲

ZIP CODE ▲

Treasurer

Telephone number 703 - 549 - 7705

11030644863

Full Name of  
Designated  
Agent

Keith Davis

Mailing Address

228 S. Washington St., Ste. 115

Alexandria

VA

22314 -

Title or Position ▼

CITY ▲

STATE ▲

ZIP CODE ▲

Assistant Treasurer

Telephone number 703 - 549 - 7705

9. **Banks or Other Depositories:** List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of Bank, Depository, etc.

BB&amp;T

Mailing Address

1909 K St., NW

Washington

DC

20006 -

CITY ▲

STATE ▲

ZIP CODE ▲

Name of Bank, Depository, etc.

Chain Bridge Bank

Mailing Address

1445-A Laughlin Ave.

McLean

VA

22101 -

CITY ▲

STATE ▲

ZIP CODE ▲

11030644864

## **EXHIBIT C**

Image# 12952193115

PAGE 1 / 78

**FEC  
FORM 3X****REPORT OF RECEIPTS  
AND DISBURSEMENTS**  
For Other Than An Authorized Committee

Office Use Only

1. NAME OF COMMITTEE (in full) TYPE OR PRINT ▼ Example: If typing, type over the lines. 12FE4M5

Reclaim America PAC

ADDRESS (number and street) ▼

228 S Washington Street

Ste 115

Check if different  
than previously  
reported. (ACC)

Alexandria

VA

22314

2. FEC IDENTIFICATION NUMBER ▼ CITY ▲ STATE ▲ ZIP CODE ▲

C C00500025

3. IS THIS REPORT ☒ NEW (N) OR ☐ AMENDED (A)

## 4. TYPE OF REPORT

(Choose One)

(a) Quarterly Reports:

April 15  
Quarterly Report (Q1)July 15  
Quarterly Report (Q2)October 15  
Quarterly Report (Q3)January 31  
Year-End Report (YE)July 31 Mid-Year  
Report (Non-election  
Year Only) (MY)Termination Report  
(TER)(b) Monthly  
Report  
Due On:

Feb 20 (M2)

May 20 (M5)

Aug 20 (M8)

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

Mar 20 (M3)

☒ Jun 20 (M6)

Sep 20 (M9)

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

Apr 20 (M4)

Jul 20 (M7)

Oct 20 (M10)

Jan 31 (YE)

(c) 12-Day

PRE-Election

Report for the:

Primary (12P)

General (12G)

Runoff (12R)

Convention (12C)

Special (12S)

Election on

in the  
State of

(d) 30-Day

POST-Election

Report for the:

General (30G)

Runoff (30R)

Special (30S)

Election on

in the  
State of

5. Covering Period 05 01 2012 through 05 31 2012

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer Lisa Lisker

Signature of Treasurer

Lisa Lisker

[Electronically Filed]

Date

06 20 2012

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

Office  
Use  
Only**FEC FORM 3X**  
Rev. 12/2004

**SCHEDULE B (FEC Form 3X)  
ITEMIZED DISBURSEMENTS**Use separate schedule(s)  
for each category of the  
Detailed Summary PageFOR LINE NUMBER:  
(check only one)

PAGE 51 OF 78

<input checked="" type="checkbox"/> 21b	<input type="checkbox"/> 22	<input type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25	<input type="checkbox"/> 26
<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c	<input type="checkbox"/> 29	<input type="checkbox"/> 30b

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

Reclaim America PAC

Full Name (Last, First, Middle Initial)

**A. On The Mark**

Date of Disbursement

MM	DD	YY
05	11	2012

Mailing Address 807 Gervais Street  
Suite 202

City	State	Zip Code
Columbia	SC	29201

Transaction ID : B450D012F658E4C3592E

Purpose of Disbursement  
Direct Mail/Postage

Amount of Each Disbursement this Period

Candidate Name

Category/  
Type

38502.85

Office Sought: ☐ House  
☐ Senate  
☐ President

Disbursement For:

☐ Primary ☐ General  
☐ Other (specify) ▼

State: District:

Full Name (Last, First, Middle Initial)

**B. US Airways**

Date of Disbursement

MM	DD	YY
05	14	2012

Mailing Address 4000 E. Sky Harbor Blvd.

City	State	Zip Code
Phoenix	AZ	85034

Transaction ID : BDD9CD5327E194264BF7

Purpose of Disbursement  
Travel

Amount of Each Disbursement this Period

Candidate Name

Category/  
Type

593.60

Office Sought: ☐ House  
☐ Senate  
☐ President

Disbursement For:

☐ Primary ☐ General  
☐ Other (specify) ▼

State: District:

Full Name (Last, First, Middle Initial)

**C. Marshall Salter**

Date of Disbursement

MM	DD	YY
05	14	2012

Mailing Address 308 W. Myrtle Street

City	State	Zip Code
Alexandria	VA	22301-2429

Transaction ID : B2CD3EF5D05CE4E56918

Purpose of Disbursement  
Strategic Consulting

Amount of Each Disbursement this Period

Candidate Name

Category/  
Type

5000.00

Office Sought: ☐ House  
☐ Senate  
☐ President

Disbursement For:

☐ Primary ☐ General  
☐ Other (specify) ▼

State: District:

SUBTOTAL of Disbursements This Page (optional).....▶

44096.45

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



Image# 12952532858

PAGE 1 / 51

**FEC  
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Check if different  
than previously  
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Alexandria

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22314

2. FEC IDENTIFICATION NUMBER ▼ CITY ▲ STATE ▲ ZIP CODE ▲

C C00500025

3. IS THIS REPORT ☒ NEW (N) OR ☐ AMENDED (A)

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(Choose One)

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Mar 20 (M3)

Jun 20 (M6)

Sep 20 (M9)

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

Apr 20 (M4)

☒ Jul 20 (M7)

Oct 20 (M10)

Jan 31 (YE)

(c) 12-Day

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Report for the:

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Runoff (12R)

Election on

in the  
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POST-Election

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Special (30S)

Election on

in the  
State of

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Type or Print Name of Treasurer Lisa Lisker

Signature of Treasurer

Lisa Lisker

[Electronically Filed]

Date

07 20 2012

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Office  
Use  
Only**FEC FORM 3X**  
Rev. 12/2004

**SCHEDULE B (FEC Form 3X)  
ITEMIZED DISBURSEMENTS**Use separate schedule(s)  
for each category of the  
Detailed Summary PageFOR LINE NUMBER:  
(check only one)

PAGE 36 OF 51

<input checked="" type="checkbox"/> 21b	<input type="checkbox"/> 22	<input type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25	<input type="checkbox"/> 26
<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c	<input type="checkbox"/> 29	<input type="checkbox"/> 30b

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NAME OF COMMITTEE (In Full)

**Reclaim America PAC**

Full Name (Last, First, Middle Initial)

**A. Marshall Salter**

Date of Disbursement

MM	DD	YY	YY
06	04	2012	

Mailing Address 308 W. Myrtle Street

City	State	Zip Code
Alexandria	VA	22301-2429

**Transaction ID : BD427B354E99447908FD**Purpose of Disbursement  
Strategic Consulting

Amount of Each Disbursement this Period

5000.00

Candidate Name

Category/  
TypeOffice Sought: ☐ House  
☐ Senate  
☐ President

Disbursement For:

☐ Primary ☐ General  
☐ Other (specify) ▼

State: District:

Full Name (Last, First, Middle Initial)

Date of Disbursement

MM	DD	YY	YY
06	04	2012	

**B. United Air**

Mailing Address 77 West Wacker Dr.

City	State	Zip Code
Chicago	IL	60601

**Transaction ID : B382E3A15C61A43FD91D**Purpose of Disbursement  
Travel

Amount of Each Disbursement this Period

593.60

Candidate Name

Category/  
TypeOffice Sought: ☐ House  
☐ Senate  
☐ President

Disbursement For:

☐ Primary ☐ General  
☐ Other (specify) ▼

State: District:

Full Name (Last, First, Middle Initial)

Date of Disbursement

MM	DD	YY	YY
06	04	2012	

**C. Doubletree Hotel-Cincinnati**

Mailing Address 6300 East Kemper Road

City	State	Zip Code
Cincinnati	OH	45241

**Transaction ID : BF1915C37E6EC4A9FAA7**Purpose of Disbursement  
Travel

Amount of Each Disbursement this Period

347.27

Candidate Name

Category/  
TypeOffice Sought: ☐ House  
☐ Senate  
☐ President

Disbursement For:

☐ Primary ☐ General  
☐ Other (specify) ▼

State: District:

**SUBTOTAL** of Disbursements This Page (optional).....▶

5940.87

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

Image# 12940329913

PAGE 1 / 51

**FEC  
FORM 3X****REPORT OF RECEIPTS  
AND DISBURSEMENTS**  
For Other Than An Authorized Committee

Office Use Only

1. NAME OF COMMITTEE (in full) TYPE OR PRINT ▼

Example: If typing, type over the lines.

12FE4M5

Reclaim America PAC

ADDRESS (number and street) ▼

228 S Washington Street

Ste 115

Check if different  
than previously  
reported. (ACC)

Alexandria

VA

22314

2. FEC IDENTIFICATION NUMBER ▼

CITY ▲

STATE ▲

ZIP CODE ▲

C C00500025

3. IS THIS  
REPORT

X

NEW  
(N)

OR

AMENDED  
(A)

## 4. TYPE OF REPORT

(Choose One)

(a) Quarterly Reports:

April 15  
Quarterly Report (Q1)July 15  
Quarterly Report (Q2)October 15  
Quarterly Report (Q3)January 31  
Year-End Report (YE)July 31 Mid-Year  
Report (Non-election  
Year Only) (MY)Termination Report  
(TER)(b) Monthly  
Report  
Due On:

Feb 20 (M2)

May 20 (M5)

Aug 20 (M8)

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

Mar 20 (M3)

Jun 20 (M6)

Sep 20 (M9)

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

Apr 20 (M4)

Jul 20 (M7)

X Oct 20 (M10)

Jan 31 (YE)

(c) 12-Day

PRE-Election

Report for the:

Primary (12P)

Convention (12C)

General (12G)

Special (12S)

Runoff (12R)

Election on

in the  
State of

(d) 30-Day

POST-Election

Report for the:

General (30G)

Runoff (30R)

Special (30S)

Election on

in the  
State of

5. Covering Period

09

01

2012

through

09

30

2012

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer Lisa Lisker

Signature of Treasurer

Lisa Lisker

[Electronically Filed]

Date

10

19

2012

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

Office  
Use  
Only**FEC FORM 3X**  
Rev. 12/2004

**SCHEDULE B (FEC Form 3X)  
ITEMIZED DISBURSEMENTS**Use separate schedule(s)  
for each category of the  
Detailed Summary PageFOR LINE NUMBER:  
(check only one)

PAGE 51 OF 51

<input checked="" type="checkbox"/> 21b	<input type="checkbox"/> 22	<input type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25	<input type="checkbox"/> 26
<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c	<input type="checkbox"/> 29	<input type="checkbox"/> 30b

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NAME OF COMMITTEE (In Full)

Reclaim America PAC

Full Name (Last, First, Middle Initial)

**A. Marshall Salter**

Date of Disbursement

MM	DD	YY	YY
09	30	2012	

Mailing Address 308 W. Myrtle Street

City	State	Zip Code
Alexandria	VA	22301-2429

Transaction ID : BDEA468B65FC94102BF7

Purpose of Disbursement  
Strategic Consulting

Amount of Each Disbursement this Period

Candidate Name

Category/  
Type

5000.00

Office Sought:	House
	Senate
	President

Disbursement For:

<input type="checkbox"/> Primary	<input type="checkbox"/> General
<input type="checkbox"/> Other (specify) ▼	

State: District:

Full Name (Last, First, Middle Initial)

**B. Capital One**

Date of Disbursement

MM	DD	YY	YY
09	30	2012	

Mailing Address 11697 Wstheimer

City	State	Zip Code
Houston	TX	77077

Transaction ID : B41BF3BDA7B5943CEA65

Purpose of Disbursement  
Bank Fee

Amount of Each Disbursement this Period

Candidate Name

Category/  
Type

23.31

Office Sought:	House
	Senate
	President

Disbursement For:

<input type="checkbox"/> Primary	<input type="checkbox"/> General
<input type="checkbox"/> Other (specify) ▼	

State: District:

Full Name (Last, First, Middle Initial)

**C.**

Date of Disbursement

MM	DD	YY	YY
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Mailing Address

City	State	Zip Code
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Purpose of Disbursement

Amount of Each Disbursement this Period

Candidate Name

Category/  
Type

Office Sought:	House
	Senate
	President

Disbursement For:

<input type="checkbox"/> Primary	<input type="checkbox"/> General
<input type="checkbox"/> Other (specify) ▼	

State: District:

SUBTOTAL of Disbursements This Page (optional)..... 5023.31

TOTAL This Period (last page this line number only)..... 49014.64

Image# 12961012370

PAGE 1 / 35

**FEC  
FORM 3X****REPORT OF RECEIPTS  
AND DISBURSEMENTS**  
For Other Than An Authorized Committee

Office Use Only

1. NAME OF COMMITTEE (in full) TYPE OR PRINT ▼ Example: If typing, type over the lines. 12FE4M5

Reclaim America PAC

ADDRESS (number and street) ▼

228 S Washington Street

Ste 115

Check if different  
than previously  
reported. (ACC)

Alexandria

VA

22314-5404

2. FEC IDENTIFICATION NUMBER ▼ CITY ▲ STATE ▲ ZIP CODE ▲

C C00500025

3. IS THIS REPORT ☒ NEW (N) OR AMENDED (A)

## 4. TYPE OF REPORT

(Choose One)

(a) Quarterly Reports:

April 15  
Quarterly Report (Q1)July 15  
Quarterly Report (Q2)October 15  
Quarterly Report (Q3)January 31  
Year-End Report (YE)July 31 Mid-Year  
Report (Non-election  
Year Only) (MY)Termination Report  
(TER)(b) Monthly  
Report  
Due On:

Feb 20 (M2)

May 20 (M5)

Aug 20 (M8)

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

Mar 20 (M3)

Jun 20 (M6)

Sep 20 (M9)

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

Apr 20 (M4)

Jul 20 (M7)

Oct 20 (M10)

Jan 31 (YE)

(c) 12-Day

PRE-Election

Report for the:

Primary (12P)

☒

General (12G)

Runoff (12R)

Convention (12C)

Special (12S)

Election on

M M / D D / Y Y Y Y  
11 06 2012in the  
State of

(d) 30-Day

POST-Election

Report for the:

General (30G)

Runoff (30R)

Special (30S)

Election on

M M / D D / Y Y Y Y

in the  
State of

5. Covering Period 10 01 2012 through 10 17 2012

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer Lisa Lisker

Signature of Treasurer Lisa Lisker

[Electronically Filed]

Date

10 25 2012

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

Office  
Use  
Only**FEC FORM 3X**  
Rev. 12/2004

**SCHEDULE B (FEC Form 3X)  
ITEMIZED DISBURSEMENTS**Use separate schedule(s)  
for each category of the  
Detailed Summary PageFOR LINE NUMBER:  
(check only one)

PAGE 28 OF 35

<input checked="" type="checkbox"/> 21b	<input type="checkbox"/> 22	<input type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25	<input type="checkbox"/> 26
<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c	<input type="checkbox"/> 29	<input type="checkbox"/> 30b

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NAME OF COMMITTEE (In Full)

**Reclaim America PAC**

Full Name (Last, First, Middle Initial)

**A. Rob Noel**

Date of Disbursement

10	03	2012
----	----	------

Mailing Address 2424 Pennsylvania Ave NW  
Unit #804

City	State	Zip Code
Washington	DC	20037-1721

**Transaction ID : BB92A24110A0D4F26BDA**Purpose of Disbursement  
Strategic Consulting

Amount of Each Disbursement this Period

1000.00

Candidate Name

Category/  
TypeOffice Sought: 

<input type="checkbox"/>	House
<input type="checkbox"/>	Senate
<input type="checkbox"/>	President

Disbursement For:

<input type="checkbox"/> Primary	<input type="checkbox"/> General
<input type="checkbox"/> Other (specify) ▼	

State: District:

Full Name (Last, First, Middle Initial)

**B. Marshall Salter**

Date of Disbursement

10	03	2012
----	----	------

Mailing Address 308 W. Myrtle Street

City	State	Zip Code
Alexandria	VA	22301-2429

**Transaction ID : B896B99B4FAFA440DBAE**Purpose of Disbursement  
Strategic Consulting

Amount of Each Disbursement this Period

5000.00

Candidate Name

Category/  
TypeOffice Sought: 

<input type="checkbox"/>	House
<input type="checkbox"/>	Senate
<input type="checkbox"/>	President

Disbursement For:

<input type="checkbox"/> Primary	<input type="checkbox"/> General
<input type="checkbox"/> Other (specify) ▼	

State: District:

Full Name (Last, First, Middle Initial)

**C. Pepco**

Date of Disbursement

10	03	2012
----	----	------

Mailing Address 702 Eighth Street NW

City	State	Zip Code
Washington	DC	20001

**Transaction ID : B1FF3E2D6675046ABB67**Purpose of Disbursement  
Utilities

Amount of Each Disbursement this Period

924.79

Candidate Name

Category/  
TypeOffice Sought: 

<input type="checkbox"/>	House
<input type="checkbox"/>	Senate
<input type="checkbox"/>	President

Disbursement For:

<input type="checkbox"/> Primary	<input type="checkbox"/> General
<input type="checkbox"/> Other (specify) ▼	

State: District:

**SUBTOTAL** of Disbursements This Page (optional).....▶

6924.79

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

## **EXHIBIT D**

# Tampa Bay Times



WINNER OF 10 PULITZER PRIZES

## RNC Tampa 2012

Follow local preparations and national politics

### Sen. Marco Rubio's autobiography presents obsessive politician with compelling family story



Alex Leary, Times Washington Bureau Chief

Monday, June 18, 2012 5:29pm

Marco Rubio was so consumed making fundraising calls for his U.S. Senate race that he didn't notice his youngest son had slipped out of their Miami home and nearly drowned.

It is one of many regrets about his political career that Rubio shares in *An American Son*, his memoir out today. Even when his campaign looked hopeless in summer 2009, Rubio interrupted a family vacation to fly to Washington for meetings.

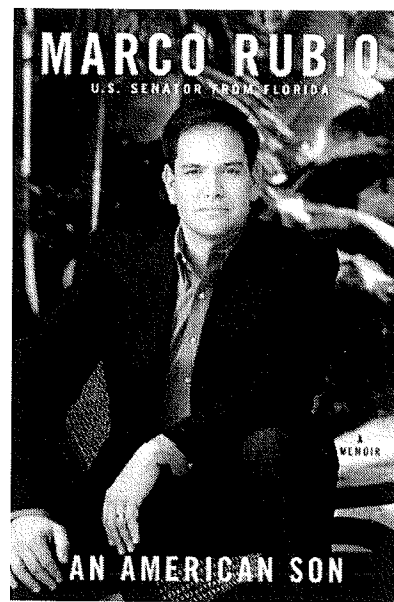
Rubio impressed the editors at *National Review* and his picture made the cover with the title, "Yes, HE CAN." The exposure led to a landslide of media attention and campaign donations.

What happened next is well known, how Rubio went from an underdog against then-Gov. Charlie Crist to Republican star and potential running mate to presumed GOP presidential nominee Mitt Romney.

The book presents a paradox. Rubio's rise has been fueled by a rich family narrative, the son of hard-working Cuban immigrants, but a relentless political drive leaves him questioning whether he entered politics too early and missed too much time with his wife and four children. "If I'm focused only on my dreams, who will help them pursue theirs?" he wonders in the 303-page book.

Landing as the immigration debate has raced back into view, the book reveals Rubio's conflicted feelings on the issue, wrestling the law-and-order views he espoused in his Senate run with the compassion of a immigrant son. "If my kids went to sleep hungry every night and my country didn't give me an opportunity to feed them, there isn't a law, no matter how restrictive, that would prevent me from coming here."

Rubio leaves a portrait of an obsessive, smart and sometimes insecure politician who had to be persuaded by his wife to stick with the Senate campaign. Readers who did not follow the 41-year-old until now or are under the





impression he is a tea party creation will be surprised by how long he has been in politics.

He tells a story about campaigning for Bob Dole in New Hampshire in 1996 and afterward getting into a vodka shot contest with friends. Then a law student, Rubio got sick on the plane home, choosing to vomit on a fellow volunteer rather than on influential U.S. Rep. Ileana Ros-Lehtinen, R-Miami. "I was convinced my brief career in Republican politics had just come to an abrupt and humiliating end thanks to my own immaturity."

By taking on past controversies such as his use of a Florida GOP-issued credit card, Rubio seems eager to address future impediments to his ascendancy. Still, critics may not be satisfied with his ultimate conclusion that he was "sometimes sloppy" with bookkeeping.

The release of *An American Son*, originally set for October, was rushed to match today's publication of an unauthorized biography by *Washington Post* reporter Manuel Roig-Franzia. (Rubio credits GOP speechwriter Mark Salter with helping him "organize and revise the manuscript on a tight schedule.") Roig-Franzia's *The Rise of Marco Rubio* presents a more analytical take on the Rubio narrative, including questions about Rubio's description of his parents as "exiles." Rubio's parents left Cuba in 1956 before Fidel Castro took power.

Rubio uses his book to defend against the suggestion he embellished the story for political gain. "All I had really said was that my parents were exiles who'd lost their country and made a better life for their children in America. If I had known the exact date of their immigration during the campaign during the claim, I would have made the same claim."

His father, who quit school in Cuba at age 8 to begin working, tried to start his own businesses in the United States but failed and mostly worked as a bartender; his mother held various blue-collar jobs. Money was tight but Rubio describes a warm upbringing, including a time when the family moved to Las Vegas in his youth and briefly joined the Mormon church.

He talks lovingly of his grandfather who instilled in him a love for politics (and Ronald Reagan) and tells of being at his father's deathbed as he slipped into delusion. "In a brief moment of lucidity, he told me, 'Yo se que te estoy molestando mucho' — I know I'm bothering you a lot.' A few minutes later, he fell asleep. I would never see him open his eyes again."

The overarching themes — family, ambition and the American Dream — are woven throughout the book.

"On the streets of the small city of West Miami, in the early months of 1998, I discovered who I was," he wrote of his first campaign, for a city commission seat that put him in intimate contact with Cuban exiles who dominate Miami politics. "I was an heir to two generations of unfulfilled dreams. I was the end of their story."

He was not on the commission long, seizing an opportunity to run in a special election for the Florida House, mindful that the winner would have a seniority edge over a big freshman class of legislators. Rubio quickly set about rising in leadership and campaigning for House speaker, arousing suspicions (false, he says) that he undercut another Miamian vying to be the first Cuban-American speaker in Florida. Rubio claimed that title in 2006 and began a two-year tenure that would begin his confrontations with Crist.

Rubio devotes much of the book to the 2010 Senate race. There are illuminating nuggets, such as a full telling of previously reported efforts by his advisers to get him out of the race when Crist looked invincible. Rubio acknowledges he planned to run for attorney general, but was angered when Crist's team leaked it to the press.

His disdain for Crist, whom he views as a man without convictions, comes through vividly — and humorously. Rubio describes showing up to a TV studio for a debate and Crist was already in position. "I was immediately struck by the smell of Red Bull ... he reeked of it," Rubio wrote. "Plus he had a mug in front of him filled with coffee. I'm in for quite a ride, I thought to myself."

Crist, who had failed to recognize Rubio's slow but steady rise, unleashed a torrent of questions about Rubio's use of a Republican Party of Florida-issued credit card and raised other issues. But Rubio felt he had stood up to the scrutiny, telling debate viewers Crist could not be trusted to challenge President Barack Obama.

Rubio devotes a lot of space to the issues raised by Crist and reporters and dismisses them as political attacks. He concedes that the decision for him and his wife to manage the books for a political committee he used in his run for speaker was a "disaster," but only because it was difficult to keep track of personal versus campaign expenses.

He also dismisses the questions about his use of the GOP credit card. Rubio explains that some of the personal charges that showed up were mistakes, either by his aides or his own doing. "For example, I pulled the wrong card from my wallet to pay for pavers," he wrote.

Throughout, Rubio reflects on his relentless political climb, recounting how he almost lost his girlfriend and future wife to long hours working on the Dole campaign, late nights as a city commissioner and time away from home while campaigning to be House speaker and presiding in Tallahassee. Yet nothing is more stark than when he was making fundraising calls and then found his son Dominick face down in their shallow pool.

"I jumped in and pulled him out. He was silent for a few seconds — seconds that felt like minutes. Then he began to cry and vomit pool water."

Rubio, the hungry politician, returned to the campaign, but says the incident left a lasting lesson. "We hurry on and attend to our business because we need to matter, and we don't always realize that we already do."

*Alex Leary can be reached at [leary@tampabay.com](mailto:leary@tampabay.com).*

#### Book signing in Tampa

Sen. Marco Rubio will be at Inkwood Books in Tampa at 7 p.m. July 1 to sign copies of his memoir. Inkwood Books is at 216 S Armenia Ave.

#### The other Rubio book

Read a *Tampa Bay Times* review of the unauthorized biography *The Rise of Marco Rubio* at [links.tampabay.com](http://links.tampabay.com).

**Sen. Marco Rubio's autobiography presents obsessive politician with compelling family story 06/18/12**  
**Photo reprints | Article reprints**

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4

Twice

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## **EXHIBIT E**

# Tampa Bay Times



WINNER OF 10 PULITZER PRIZES

## Building the Marco Rubio brand

By Alex Leary and Adam C. Smith, Times Staff Writers

Saturday, February 16, 2013 3:30am

WASHINGTON

Sen. Marco Rubio is on a breathless rise, a testament to his political skill and demographic appeal that last week saw him delivering the Republican State of the Union response and appearing on the cover of *Time* as "The Republican Savior." But behind the scenes is a relentless, methodical effort to build the Rubio brand, aided by a team of strategists and media handlers positioning the 41-year-old Floridian for an expected presidential run.

They include members of Rubio's Senate staff and presidential campaign veterans who work for the political committee Rubio formed ostensibly to help elect other conservatives.

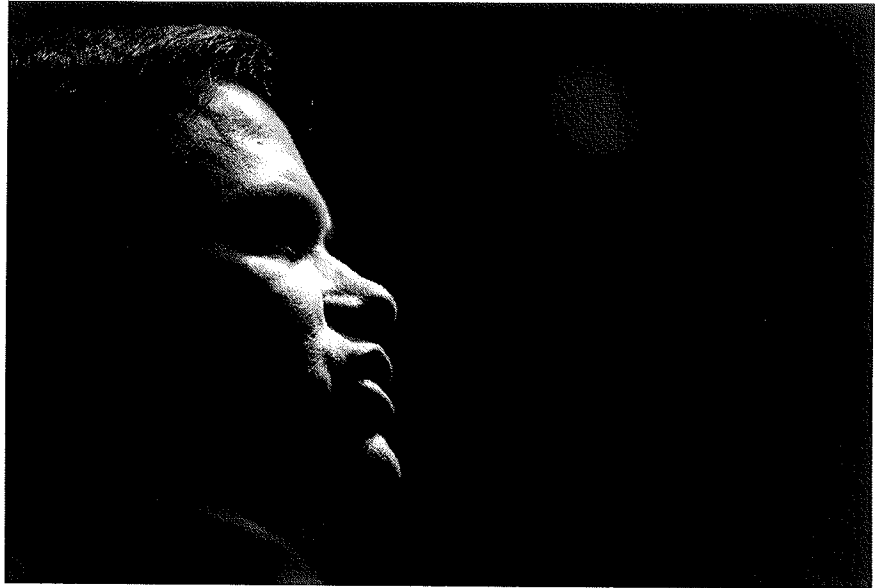
Instead, the Reclaim America PAC has focused on consultants and building a national fundraising network. Last year, his PAC spent more than \$1.7 million, with the vast majority going toward staff and fundraising, and about \$110,000 going to other candidates, according to the Center for Responsive Politics.

"It connotes a machine, someone who is grooming his image for a jump to higher position," said the center's executive director Sheila Krumholz.

Rubio's team plots policy and publicity moves, including his recent foray into the immigration debate. He was among eight senators working on a proposal, but Rubio took them by surprise — and ensured he would be front and center — with a *Wall Street Journal* piece laying out the framework before the group announced it.

The Rubio machine cultivates the image of a new breed of Republican, youthful, and as at ease talking about Tupac and the Miami Dolphins as talking about budget deficits. At the same time advisers dole out nuggets to the news media, they aggressively contest even the smallest points in articles.

The political fascination with Rubio has made it easier for his team to build helpful story lines. When he first took office in the U.S. Senate, it was Rubio the humble, political star keeping his head down. That was followed with periodic "major" policy rollouts — foreign policy, job creation, the middle class. When Rubio gives a speech it's invariably a "major" address. A young assistant is always there to record it on video and take photographs.



Getty Images

"It's almost like he's the Backstreet Boy of American politics, a Hollywood creation of what a model political candidate should be," said Chris Ingram, a Republican communications consultant from Tampa who has been critical of Rubio. "He has to deliver on the hype, but from a P.R. perspective, it's textbook."

And constant. Last week, Rubio issued 17 press releases. By comparison, former vice presidential candidate Paul Ryan, another potential 2016 candidate, released three.

...

Rubio's political inner circle includes PAC employees Heath Thompson and Terry Sullivan, two operatives who made their names in South Carolina's bare-knuckled political culture and are close with former Sen. Jim DeMint. The hyper-competitive Thompson is a college football fanatic more comfortable in a baseball cap than suit and tie.

For broad messaging strategy, there is the roguishly charming Todd Harris who knows practically everybody in the political media and is never shy about excoriating reporters.

The Senate staff includes Alberto Martinez, who goes back to Rubio's days as speaker of the Florida House and can anticipate where critics might attack Rubio, and Alex Burgos, another Rubio campaign alum and true believer who pushes back at any hint of negativity in Rubio coverage.

At the center is Rubio himself: charming, articulate and calculating. He long ago recognized the power of personal narrative and stepping into the right moment. On immigration he has reinvented himself as a reformer, backing away from the hardliner he was two years ago as a candidate moving to the right to meet a rising tea party.

In his speech after the State of the Union, he spoke of his Cuban immigrant parents and said the words "middle class" 16 times, part of an effort to show himself as a regular guy, the anti-Mitt Romney, even though the underlying big-government-is-bad theme struck many as old school Republicanism.

The image-building has been so well executed that it made Rubio's awkward grab for water even more startling — an unscripted moment that showed him at once human and un-savior like.

Rubio deftly poked fun at himself, tweeting a picture of the Poland Spring bottle. But well before the gaffe, his press handlers ensured he would control the message the next morning, having booked a string of TV appearances, including *Fox and Friends* and *Good Morning America*. Rubio also went on CNN en Espanol, where, speaking fluent Spanish, he reached an audience mostly untapped by other politicians.

He finished the day on conservative radio. When host Mark Levin asked how Rubio could put up with "stupid interviewers" (meaning the mainstream media), Rubio made a sports analogy about a warm weather team having to play in cold areas and added:

"You've got to play the game."

...

The stated purpose of the Reclaim America PAC, which sustains much of Rubio's political team, is to help elect other conservatives.

But of the \$1.7 million spent through Dec. 31, only about \$110,000 went to candidates, among the least generous of all PACs, according to an analysis conducted by the Center for Responsive Politics. About \$98,000 of that was earmarked by donors, meaning Rubio's PAC directed very little contributions itself.

Instead the PAC was used to pay Rubio's political consultants, generate fundraising lists and mailers, conduct polling and travel.

Neither Rubio nor any of his Senate or political staffers would comment for this article. Sullivan emailed a

statement: "Using his PAC's resources and organization, Marco was able to attend over 100 political events for nearly two dozen Republican candidates last year. He headlined rallies and fundraisers in 21 states across the country raised several million dollars for Republicans. No other elected official not on the ballot did more to help elect Republicans in 2012."

Harris and Thompson are partners in Something Else Strategies, a firm that earned \$157,000 through the end of the year from the PAC. Sullivan collected more than \$140,000, while also working on Rubio's Senate staff. Martinez earned \$75,000 from the PAC before recently replacing Sullivan as Rubio's deputy chief of staff.

Krumholz of the Center for Responsive Politics said Rubio's PAC spending reflects the "kittys" other top-name politicians set up to advance their careers. That would include then-Sen. Barack Obama, who gave more to candidates than Rubio but assembled a political team through his committee.

Rubio also spent hundreds of thousands on his fundraising effort, which includes direct mail nationwide. In one piece that landed last week, Rubio gives a strong clue of his next move, saying the 2012 election showed the GOP must not do a better job of explaining how its policies help Americans but "that it's time new messengers came forward to carry the torch."

"As the son of immigrants, I firmly believe that our time for reaching out is now," Rubio says. "We must act fast."

In a savvy move after the water bottle incident, the PAC on Wednesday began offering water bottles with Rubio's name on them to anyone who donated at least \$25. "Send the liberal detractors a message that not only does Marco Rubio inspire you ... he hydrates you too," the pitch read.

Rubio used his PAC to pay \$20,000 to Mark Salter, a strategist who helped run John McCain's 2008 presidential campaign, for help writing a memoir. *An American Son* came out last year, and Rubio parlayed it into a highly-publicized bus tour through key election states. Loads of gushing national TV exposure followed.

...

An early favorite for the GOP presidential nomination in 2016, his State of the Union response brought new recognition but also more scrutiny.

Rubio, who paid a company nearly \$50,000 to do research into his background, has his team ready to push back. Nothing seems to small or far-flung.

A common example: A *Pittsburgh Post-Gazette* reporter in 2011 posted a blog item about a news conference and mentioned how Rubio showed up late and "did his best to steal the show" with stirring talk about his elderly mother. The reporter was startled when an hour later Burgos reached out to complain. Still, Burgos managed to get the blog updated.

"It certainly is a long time to try to stay safe until 2016, if he's running," said Republican strategist Alex Castellanos. "You have to have real substance to last that long. Image alone won't do it." He said Rubio's speech was a good first step, and the lawmaker followed the next day by introducing a bill that would give tax credits so poor kids can attend private school.

"Rubio may be fortunate that he got this early attention so that stories like inflating his resume about his Cuban roots and the credit card have been raised enough at the national level that they won't be treated as news," said Norm Ornstein, resident scholar at the conservative American Enterprise Institute, and a longtime watcher of Congress. "But if I were a political figure and had a cover on *Time* that said 'the savior,' I would have at best mixed emotions. The more you get built up, the more the temptation (of the media) to show the chinks in your armor and bring you down."

Rubio knows that. Shortly after the cover came out, he went to Twitter. "There is only one savior," he wrote, "and

it's not me. #Jesus."

*Times staff writer Connie Humburg* contributed to this report. Alex Leary can be reached at [leary@tampabay.com](mailto:leary@tampabay.com). Adam C. Smith can be reached at [asmith@tampabay.com](mailto:asmith@tampabay.com).

## Building the Marco Rubio brand 02/16/13

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## **EXHIBIT F**



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One of the first things I learned while writing an account of my life was not to rely entirely on my fallible memory. Luckily, I had a great deal of help reconstructing my family's past, none more valuable than the contributions my sister Veronica made both to recalling our story and then writing it. I am much indebted to her. My brother, Mario, and sister Barbara were very helpful as well, especially in recalling the family's early years in America before I was born. My aunts Georgina and Magda also supplied important recollections as did, of course, my mother, Oriaes Rubio.

I was fortunate to be represented and advised by my experienced and wise lawyer Bob Barnett, and to be in the care of an excellent publishing house, Sentinel. I want to thank especially my publisher, Adrian Zackheim, for his encouragement and counsel; associate publisher, Will Weisser; and the indefatigable Niki Papadopoulos, who edited the book with great skill and intelligence. I am grateful to Mark Salter for helping me organize and revise the manuscript on a tight schedule.

Thanks are also due to Allison McLean and Christy D'Agostini for arranging publicity for the book; Natalie Horbachevsky for the interior art and jacket routing and for coordinating the Spanish edition; and everyone in Sentinel's production team, who worked diligently to bring this book to market in record time.

Writing about my Senate campaign reminded me again how much I owe the people who worked so hard to help elect me. Good campaigns make good candidates, and they are the work of many talented, dedicated individuals. I was fortunate to have more than my fair share of some of the best people in the business. In no specific order I want to thank each of you. David Rivera, Alina Garcia, Ralph Arza, Steve and Viviana Bovo, Esther Nuhfer and Gaston Cantens. My campaign chairman, Al Hoffman. My finance chairman, Jay Demetree. My campaign manager, Jose Mallea. Heath Thompson, Todd Harris, Malorie Thompson, Julio Rebull Jr., Albert Martinez, Alex Burgos, Pat Shortridge, Anthony Bustamante, Brandon Patty, Whit Ayres, Zach Burr, Carmen Miller Spence, Ann Herberger, Michael Beach, Dawn Dettling, Patrick Mooney, Eileen Pineiro, JR Sanchez, Luke Marchant, Joe Pounder, Jeff Bechdel, Orlando "Landy" Cicilia, Emily Bouck, Jessica Fernandez,

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# **EXHIBIT G**

**FEC  
FORM 3X****REPORT OF RECEIPTS  
AND DISBURSEMENTS**  
For Other Than An Authorized Committee

Office Use Only

1. NAME OF COMMITTEE (in full) TYPE OR PRINT ▼ Example: If typing, type over the lines. 12FE4M5

Reclaim America PAC

ADDRESS (number and street) ▼

228 S WASHINGTON ST STE 115

Check if different  
than previously  
reported. (ACC)

Alexandria

VA

22314

2. FEC IDENTIFICATION NUMBER ▼ CITY ▲ STATE ▲ ZIP CODE ▲

C C00500025

3. IS THIS REPORT X NEW (N) OR AMENDED (A)

## 4. TYPE OF REPORT

(Choose One)

(a) Quarterly Reports:

April 15  
Quarterly Report (Q1)July 15  
Quarterly Report (Q2)October 15  
Quarterly Report (Q3)January 31  
Year-End Report (YE)X July 31 Mid-Year  
Report (Non-election  
Year Only) (MY)Termination Report  
(TER)(b) Monthly  
Report  
Due On:

Feb 20 (M2)

May 20 (M5)

Aug 20 (M8)

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

Mar 20 (M3)

Jun 20 (M6)

Sep 20 (M9)

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

Apr 20 (M4)

Jul 20 (M7)

Oct 20 (M10)

Jan 31 (YE)

(c) 12-Day

PRE-Election

Report for the:

Primary (12P)

General (12G)

Runoff (12R)

Convention (12C)

Special (12S)

Election on

in the  
State of

(d) 30-Day

POST-Election

Report for the:

General (30G)

Runoff (30R)

Special (30S)

Election on

in the  
State of

5. Covering Period 01 01 2015 through 06 30 2015

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer Lisa Lisker

Signature of Treasurer

Lisa Lisker

[Electronically Filed]

Date

07 31 2015

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

Office  
Use  
Only**FEC FORM 3X**  
Rev. 12/2004

**SCHEDULE B (FEC Form 3X)  
ITEMIZED DISBURSEMENTS**Use separate schedule(s)  
for each category of the  
Detailed Summary PageFOR LINE NUMBER:  
(check only one)

PAGE 328 OF 490

<input checked="" type="checkbox"/> 21b	<input type="checkbox"/> 22	<input type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25	<input type="checkbox"/> 26
<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c	<input type="checkbox"/> 29	<input type="checkbox"/> 30b

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

Reclaim America PAC

Full Name (Last, First, Middle Initial)

**A. MARSHALL SALTER**

Date of Disbursement

M	M	/	D	D	/	Y	Y	Y	Y
01			08			2015			

Mailing Address 308 W. MYRTLE ST.

City	State	Zip Code
ALEXANDRIA	VA	22301

Purpose of Disbursement  
STRATEGIC CONSULTING

Candidate Name

Category/  
Type

Transaction ID : SB21B.I10174

Amount of Each Disbursement this Period

7000.00

Office Sought:	<input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President
State:	District:

Disbursement For:

☐ Primary ☐ General  
☐ Other (specify) ▼

Full Name (Last, First, Middle Initial)

**B. TERRY SULLIVAN**

Date of Disbursement

M	M	/	D	D	/	Y	Y	Y	Y
01			07			2015			

Mailing Address 503 C ST. NE

City	State	Zip Code
WASHINGTON	DC	20002

Purpose of Disbursement  
STRATEGIC CONSULTING

Candidate Name

Category/  
Type

Transaction ID : SB21B.I9638

Amount of Each Disbursement this Period

16500.00

Office Sought:	<input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President
State:	District:

Disbursement For:

☐ Primary ☐ General  
☐ Other (specify) ▼

Full Name (Last, First, Middle Initial)

**C. TERRY SULLIVAN**

Date of Disbursement

M	M	/	D	D	/	Y	Y	Y	Y
01			26			2015			

Mailing Address 503 C ST. NE

City	State	Zip Code
WASHINGTON	DC	20002

Purpose of Disbursement  
STRATEGIC CONSULTING

Candidate Name

Category/  
Type

Transaction ID : SB21B.I9639

Amount of Each Disbursement this Period

16500.00

Office Sought:	<input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President
State:	District:

Disbursement For:

☐ Primary ☐ General  
☐ Other (specify) ▼

SUBTOTAL of Disbursements This Page (optional).....▶

40000.00

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

## **EXHIBIT H**

Image# 13960613020

PAGE 1 / 57

**FEC  
FORM 3X****REPORT OF RECEIPTS  
AND DISBURSEMENTS**  
For Other Than An Authorized Committee

Office Use Only

1. NAME OF  
COMMITTEE (in full)

TYPE OR PRINT ▼

Example: If typing, type  
over the lines.

12FE4M5

Reclaim America PAC

ADDRESS (number and street)

228 S Washington Street

Ste 115

Check if different  
than previously  
reported. (ACC)

Alexandria

VA

22314-5404

2. FEC IDENTIFICATION NUMBER ▼

CITY ▲

STATE ▲

ZIP CODE ▲

C C00500025

3. IS THIS  
REPORT

X

NEW  
(N)

OR

AMENDED  
(A)

4. TYPE OF REPORT

(Choose One)

(a) Quarterly Reports:

April 15  
Quarterly Report (Q1)July 15  
Quarterly Report (Q2)October 15  
Quarterly Report (Q3)X January 31  
Year-End Report (YE)July 31 Mid-Year  
Report (Non-election  
Year Only) (MY)Termination Report  
(TER)(b) Monthly  
Report  
Due On:

Feb 20 (M2)

May 20 (M5)

Aug 20 (M8)

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

Mar 20 (M3)

Jun 20 (M6)

Sep 20 (M9)

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

Apr 20 (M4)

Jul 20 (M7)

Oct 20 (M10)

Jan 31 (YE)

(c) 12-Day

PRE-Election

Report for the:

Primary (12P)

Convention (12C)

General (12G)

Special (12S)

Runoff (12R)

Election on

in the  
State of

(d) 30-Day

POST-Election

Report for the:

General (30G)

Runoff (30R)

Special (30S)

Election on

in the  
State of

5. Covering Period

11

27

2012

through

12

31

2012

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer Lisa Lisker

Signature of Treasurer

Lisa Lisker

[Electronically Filed]

Date

01

31

2013

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

Office  
Use  
Only**FEC FORM 3X**  
Rev. 12/2004

# SUMMARY PAGE OF RECEIPTS AND DISBURSEMENTS

FEC Form 3X (Rev. 02/2003)

Page 2

Write or Type Committee Name

Reclaim America PAC

Report Covering the Period: From: 11 / 27 / 2012 To: 12 / 31 / 2012

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. (a) Cash on Hand January 1, 2012		275313.53
(b) Cash on Hand at Beginning of Reporting Period.....	64574.37	
(c) Total Receipts (from Line 19).....	173218.44	1297914.85
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B).....	237792.81	1573228.38
7. Total Disbursements (from Line 31).....	76272.35	1411707.92
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d)).....	161520.46	161520.46
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).....	0.00	

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

## For further information contact:

Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

Toll Free 800-424-9530  
Local 202-694-1100

# **DETAILED SUMMARY PAGE** of Receipts

FEC Form 3X (Rev. 06/2004)

Page 3

Write or Type Committee Name

Reclaim America PAC

Report Covering the Period:

From:

11

27

2012

To:

12

31

2012

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		
(i) Itemized (use Schedule A).....	40651.00	534804.67
(ii) Unitemized .....	43490.17	335756.93
(iii) TOTAL (add Lines 11(a)(i) and (ii))..... ►	84141.17	870561.60
(b) Political Party Committees .....	0.00	0.00
(c) Other Political Committees (such as PACs).....	32000.00	292850.00
(d) Total Contributions (add Lines 11(a)(iii), (b), and (c)) (Carry Totals to Line 33, page 5) .....	116141.17	1163411.60
12. Transfers From Affiliated/Other Party Committees.....	57005.27	129812.99
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).....	72.00	4690.26
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))..... ►	173218.44	1297914.85
20. Total Federal Receipts (subtract Line 18(c) from Line 19)..... ►	173218.44	1297914.85



# **DETAILED SUMMARY PAGE** of Disbursements

FEC Form 3X (Rev. 02/2003)

Page 4

II. Disbursements	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
21. 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 .....	78772.35	1321324.02
(c) Total Operating Expenditures (add 21(a)(i), (a)(ii), and (b)) .....	78772.35	1321324.02
22. Transfers to Affiliated/Other Party Committees .....	0.00	0.00
23. Contributions to Federal Candidates/Committees and Other Political Committees .....	-2500.00	72984.67
24. Independent Expenditures (use Schedule E) .....	0.00	2399.23
25. Coordinated Party Expenditures (2 U.S.C. §441a(d)) (use Schedule F) .....	0.00	0.00
26. Loan Repayments Made .....	0.00	0.00
27. Loans Made .....	0.00	0.00
28. Refunds of Contributions To:		
(a) Individuals/Persons Other Than Political Committees .....	0.00	15000.00
(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	15000.00
29. Other Disbursements .....	0.00	0.00
30. Federal Election Activity (2 U.S.C. §431(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
(c) Total Federal Election Activity (add 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)) ..	76272.35	1411707.92
32. Total Federal Disbursements (subtract Line 21(a)(ii) and Line 30(a)(ii) from Line 31) .....	76272.35	1411707.92

**DETAILED SUMMARY PAGE**  
of Disbursements

FEC Form 3X (Rev. 02/2003)

Page 5

III. Net Contributions/Operating Expenditures	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
33. Total Contributions (other than loans) (from Line 11(d), page 3) .....	116141.17	1163411.60
34. Total Contribution Refunds (from Line 28(d)) .....	0.00	15000.00
35. Net Contributions (other than loans) (subtract Line 34 from Line 33) .....	116141.17	1148411.60
36. Total Federal Operating Expenditures (add Line 21(a)(i) and Line 21(b)) .....	78772.35	1321324.02
37. Offsets to Operating Expenditures (from Line 15, page 3) .....	72.00	4690.26
38. Net Operating Expenditures (subtract Line 37 from Line 36) .....	78700.35	1316633.76