

October 24, 2016

The Honorable John A. Koskinen
Commissioner
Internal Revenue Service
1111 Constitution Ave., N.W.
Washington, DC 20224

By electronic mail (IRS.Commissioner@IRS.gov) and First Class mail

Re: Complaint against The Government Integrity Fund, Inc.

Dear Commissioner Koskinen:

Citizens for Responsibility and Ethics in Washington (“CREW”) respectfully requests the Internal Revenue Service (“IRS”) investigate whether The Government Integrity Fund, Inc. (“GIF”), a non-profit organization exempt from taxation pursuant to section 501(c)(4) of the Internal Revenue Code (“Code”), is operated primarily to influence political campaigns in violation of the Code. CREW further requests the IRS investigate whether GIF and its chairman, Joel Riter, violated federal law by failing to disclose at least \$2.45 million it spent on political activity in 2014, and whether GIF violated the Code by filing its 2014 tax return 14 months late.¹

The amount of GIF’s political spending in 2014 appears to have violated its tax-exempt status, and the group seems to have taken extraordinary steps to avoid disclosing information demonstrating that fact. GIF’s 2014 tax return was due in May 2015, but it failed to file it until July 2016. And the tax return GIF finally did file left out millions of dollars in political expenditures – missing spending that is critical to GIF’s apparent attempt to conceal its violation of its tax-exempt status.

While GIF admitted to donating more than \$1.13 million to political action committees in 2014, it failed to disclose an additional \$615,798 in similar contributions, according to Federal Election Commission (“FEC”) filings. GIF also contributed \$735,000 to a non-profit organization that the recipient group admitted to having used immediately for political expenditures, but GIF did not report that spending as political activity. Just accounting for all of GIF’s political contributions, political expenditures make up at least 55% of the group’s overall spending in 2014. GIF also paid between \$1.1 and \$1.4 million dollars for television advertisements supporting a candidate for the Arkansas Senate seat, but again failed to report it as political activity. That spending also is political, ultimately making political expenditures account for as much as 86.7% of GIF’s overall spending.

As a result, politics appears to have been GIF’s primary activity in 2014, a violation of its tax-exempt status. In addition, GIF appears to have violated the Code by filing its tax return 14

¹ CREW submits this letter in lieu of Form 13909; a copy is being sent to the Dallas office.

months late, and both GIF and Mr. Riter appear to have violated federal law by making false representations to the IRS.

The Government Integrity Fund, Inc.'s Political Activity

GIF is a non-profit corporation established in 2011 in Ohio and granted tax-exempt status in January 2012.² Mr. Riter is the group's chairman.³ Mr. Riter also is an officer or director of several other section 501(c)(4) organizations and political action committees, and has experience filing Form 990 tax forms and campaign finance disclosure reports. For example, Mr. Riter serves as president of Citizens for a Working America Inc. ("CWA"), as director and secretary for the Foundation for Economic Prosperity Inc., and as treasurer of the Concrete and Portland Cement Action Network.⁴

During 2014, GIF made a total of \$1,749,066 in contributions to four political action committees, according to reports those organizations filed with the FEC. Mr. Riter or GIF appear to be involved with three of those groups. Between April 18 and May 15, 2014, GIF made two contributions to The Government Integrity Fund Action Network ("GIFAN") totaling \$1,055,000, according to reports GIFAN filed with the FEC.⁵ Even though GIF has not identified GIFAN as a related entity on its tax returns, GIFAN's name strongly suggests it is closely tied to GIF. GIFAN is a federal independent expenditure-only political committee, commonly known as a super PAC.⁶ Super PACs are organized and operated primarily for the purpose of making independent political expenditures, and thus are political organizations under section 527.⁷

GIF also contributed a total of \$444,006 to Citizens for a Working America PAC ("CWA PAC") between June 26 and July 15, 2014,⁸ gave \$85,000 to the Concrete and Portland Cement

² The Government Integrity Fund 2014 Form 990, at 1 (excerpts attached as Exhibit A); The Government Integrity Fund, Form 1024, at 1, *available at* <https://www.propublica.org/documents/item/445423-govt-integrity-fund-1024>.

³ The Government Integrity Fund 2014 Form 990, Part VII.

⁴ Citizens for a Working America Inc. 2013 Form 990, at 1 (excerpts attached as Exhibit B); Foundation for Economic Prosperity Inc. 2014 Form 990, Part VII, Section A, Line 3, *available at* http://990s.foundationcenter.org/990_pdf_archive/465/465333489/465333489_201412_990O.pdf; Concrete and Portland Cement Action Network, FEC Form 3X, 2016 October Quarterly Report, Oct. 12, 2016, *available at* <http://docquery.fec.gov/pdf/518/201610129032267518/201610129032267518.pdf>.

⁵ The Government Integrity Fund Action Network, FEC Form 3X, 2014 May Monthly Report, May 20, 2014, *available at* <http://docquery.fec.gov/pdf/748/14961172748/14961172748.pdf>; The Government Integrity Fund Action Network, FEC Form 3X, 2014 June Monthly Report, June 17, 2014, *available at* <http://docquery.fec.gov/pdf/437/14941324437/14941324437.pdf>.

⁶ The Government Integrity Fund Action Network, FEC Form 1, Statement of Organization, July 11, 2011, *available at* <http://docquery.fec.gov/pdf/605/11030622605/11030622605.pdf>.

⁷ 26 U.S.C. § 527(e)(1).

⁸ Citizens for a Working America PAC, FEC Form 3X, 2014 Pre-Runoff Report, July 10, 2014, *available at* <http://docquery.fec.gov/pdf/940/14961548940/14961548940.pdf>; Citizens for a Working America PAC, FEC Form 3X, 2014 October Quarterly Report, Oct. 15, 2014, *available at* <http://docquery.fec.gov/pdf/792/14978283792/14978283792.pdf>. While CWA has not identified CWA PAC as a related entity on its tax returns, its name strongly suggests it is closely tied to CWA.

Action Network on September 29, 2014,⁹ and made two contributions totaling \$165,000 to the Hometown Freedom Action Network on September 29 and 30, 2014.¹⁰ CWA PAC, the Concrete and Portland Cement Action Network, and Hometown Freedom Action Network are all super PACs.¹¹

In addition to these super PAC contributions, GIF donated hundreds of thousands of dollars to a section 501(c)(4) organization that the recipient group immediately spent on political campaign activity. On October 20, 2014, the Mid America Fund (“MAF”), a section 501(c)(4) organization,¹² received \$435,000 from GIF, plus another \$125,000 from the Republican Governors Association,¹³ according to a report MAF filed with the Rhode Island Board of Elections.¹⁴ The next day, MAF spent \$557,420 – almost the exact same amount it received – for a political expenditure intended to defeat the Democratic candidate running for Rhode Island governor, Gina Raimondo.¹⁵ On October 31, 2014, MAF engaged in a similar set of transactions, receiving \$300,000 from GIF and spending \$302,500 on an expenditure intended to defeat Ms. Raimondo, according to another report MAF filed with the Rhode Island Board of Elections.¹⁶ MAF acknowledged the spending was political on its tax returns, reporting it paid this money to a Republican ad firm for “production and media” of “independent expenditures.”¹⁷

In all, GIF contributed \$2,484,066 to the four super PACs and MAF. In addition to these political contributions, GIF spent more than \$1 million on advertisements supporting then-Rep. Tom Cotton (R-AR) in his successful run for Senate. As noted, GIF contributed \$1,055,000 in 2014 to GIFAN, a super PAC. GIFAN in turn spent \$1,047,880 on “broadcast/cable and digital advertising” independent expenditures supporting now-Sen. Cotton.¹⁸ One of GIFAN’s ads

⁹ Concrete and Portland Cement Action Network, FEC Form 3X, 2014 October Quarterly Report, Oct. 15, 2014, available at <http://docquery.fec.gov/pdf/648/14978217648/14978217648.pdf>.

¹⁰ Hometown Freedom Action Network, FEC Form 3X, 2014 October Quarterly Report, Oct. 15, 2014, available at <http://docquery.fec.gov/pdf/816/14952923816/14952923816.pdf>.

¹¹ Citizens for a Working America PAC, FEC Form 1, Statement of Organization, Amended, Sept. 10, 2010, available at <http://docquery.fec.gov/pdf/372/10030422372/10030422372.pdf>; Hometown Freedom Action Network, FEC Form 1, Statement of Organization, Amended, Aug. 17, 2012, available at <http://docquery.fec.gov/pdf/529/12030883529/12030883529.pdf>; Concrete and Portland Cement Action Network, FEC Form 1, Statement of Organization, Amended, Sept. 29, 2014, available at <http://docquery.fec.gov/pdf/681/14978040681/14978040681.pdf>.

¹² The Government Integrity Fund 2014 Form 990, Schedule I, Part II.

¹³ *Id.*; The RGA is a political organization whose “primary mission is to help elect Republicans to governorships throughout the nation.” See <http://www.rga.org/about/>.

¹⁴ Mid America Fund, Report of Independent Expenditures, Electioneering Communications or Covered Transfers (CF-8), Oct. 21, 2014, available at <http://ricampaignfinance.com/ReportsScanned/Public-INDEPENDENT%20EXPENDITURE-08c9871e-4919-44bf-835e-d46e3236268e.pdf>.

¹⁵ *Id.*

¹⁶ Mid America Fund, Report of Independent Expenditures, Electioneering Communications or Covered Transfers (CF-8), Oct. 31, 2014, available at <http://ricampaignfinance.com/ReportsScanned/Public-INDEPENDENT%20EXPENDITURE-75783b62-24b8-4e3b-beed-3c633db92405.pdf>.

¹⁷ Mid America Fund, Inc. 2014 Form 990, Part VII, Section B, Line 1, Schedule C, Part I-C, Line 1 (excerpts attached as Exhibit C); www.poundfeinstein.com.

¹⁸ The Government Integrity Fund Action Network, FEC Form 3X, 2014 May Monthly Report, May 20, 2014; The Government Integrity Fund Action Network, FEC Form 3X, 2014 June Monthly Report, June 17, 2014.

praised Sen. Cotton's military service, saying: "Tom Cotton has always served our country with honor, integrity, and character. It's something Washington could use a little more of."¹⁹ The ad concluded with the on-screen words, "Tom Cotton. For Arkansas."²⁰ The separate ad apparently run by GIF was nearly identical to GIFAN's, with only a small change to the conclusion in a transparent attempt to make it appear related to issues rather than politics. GIF's ad is word-for-word and image-for-image the same as GIFAN's until the conclusion, when it instead finishes with the on-screen message, "call Representative Tom Cotton (202) 225-3772 keep fighting Obamacare and bailouts."²¹

It is not known exactly how much GIF spent to run the ad or when it was broadcast. According to a July 1, 2014 *Politico* story, GIF planned to spend \$1.1 million to run the ads.²² In addition, GIF reported to the IRS it spent \$1,399,123 on "issues communications" in 2014,²³ at least some which appears to have been for the pro-Cotton ad buy. GIF reported paying that same amount to Target Enterprises for "consulting,"²⁴ and contracts filed with the Federal Communications Commission show that Target Enterprises purchased air time for GIF in Arkansas in July 2014.²⁵

The *Politico* story also reported that starting on July 11, 2014, GIF would run ads boosting Sen. Cotton "over the next six weeks."²⁶ If the ads ran for those six weeks, they would have ended around August 22, 2014, two weeks before the beginning of the 60-day pre-election period during which ads like GIF's would have had to be reported as electioneering communications to the FEC.²⁷

The Government Integrity Fund, Inc.'s Failure to File Its Tax Return on Time

As a section 501(c)(4) tax-exempt organization, GIF is required to file annual Form 990 tax returns.²⁸ The tax returns must be filed within four and a half months after the end of the organization's fiscal year.²⁹ For organizations like GIF that use a calendar year cycle, the annual

¹⁹ See <https://www.youtube.com/watch?v=XUtMPWk2Dks>. GIFAN posted the ad on YouTube, and appears to be the same ad it paid broadcast.

²⁰ See <https://www.youtube.com/watch?v=XUtMPWk2Dks>.

²¹ See <https://www.youtube.com/watch?v=2SU2PoJ53yM>.

²² Maggie Haberman, *Pro-Cotton Super PAC Going Back Up*, *Politico*, July 1, 2014, available at <http://www.politico.com/story/2014/07/tom-cotton-government-integrity-fund-arkansas-senate-election-2014-108482>.

²³ The Government Integrity Fund 2014 Form 990, Part IX, Line 24d.

²⁴ The Government Integrity Fund 2014 Form 990, Part VII, Section B, Line 1.

²⁵ See, e.g., Contract with KHBS-KHOG TV, July 20, 2014 (\$11,942 for ads running July 11-17, 2014), available at <https://www.documentcloud.org/documents/1236368-targetenterprisegif-invoice-7-20-14.html>. Target Enterprises was also the ad buyer GIFAN used for its pro-Cotton ads. See The Government Integrity Fund Action Network, *FEC Form 3X, 2014 May Monthly Report*, May 20, 2014; The Government Integrity Fund Action Network, *FEC Form 3X, 2014 June Monthly Report*, June 17, 2014.

²⁶ Haberman, *Politico*, July 1, 2014.

²⁷ See http://www.fec.gov/info/charts_ec_dates_2014.shtml#General; 52 U.S.C. § 30104(f)(3); 11 C.F.R. § 100.29.

²⁸ 26 U.S.C. § 6033(a)(1); Treas. Reg. § 1-6033-2(a).

²⁹ Treas. Reg. § 1-6033-2(e).

Form 990 is due on May 15 of the following year.³⁰ The IRS automatically grants one three-month extension, and tax-exempt organizations may request – and are routinely granted – a second three-month extension for reasonable cause.³¹

GIF's 2014 Form 990 was due May 15, 2015. The publicly-available copy of GIF's 2014 tax return does not show any requested or granted extensions.³² However, GIF failed to file the tax return until July 10, 2016, nearly 14 months late.³³

It is not even clear that GIF would have filed its 2014 tax return at all if not for repeated requests for it by a member of the news media. Only after *Open Secrets* asked GIF for its 2014 tax return multiple times did GIF's attorney say that it would file the Form 990.³⁴

This also is not the first time GIF has filed its tax return far past the deadline. In fact, GIF has never filed a tax return even close to on time. GIF's 2012 Form 990, the first one it needed to file, was due May 15, 2013. GIF did not request an extension, but failed to file its tax return until January 13, 2014 at earliest, nearly eight months late.³⁵ GIF sent a letter with the Form 990 that “sincerely apologize[d] for filing late” and asked the IRS to take into account several “issues” in “assessing a penalty.”³⁶ GIF further assured the IRS it had hired an accountant to complete its 2012 and subsequent returns, and said “[t]here should not be any issued [*sic*] with filing the returns timely in the future.”³⁷

Despite these assurances, GIF filed its 2013 Form 990 similarly late, just as it did for its 2014 tax return, as discussed above. GIF's 2013 tax return was due May 15, 2014, but the group did not file it until at least February 19, 2015.³⁸

The Government Integrity Fund, Inc.'s Representations to the IRS

As part of the annual Form 990 tax returns section 501(c)(4) organizations like GIF are required to file, tax-exempt groups engaged in any “direct or indirect political campaign activities on behalf of or in opposition to candidates for public office” must file a Schedule C,

³⁰ See <https://www.irs.gov/charities-non-profits/political-organizations/exempt-organization-filing-requirements-form-990-due-date>.

³¹ See <https://www.irs.gov/charities-non-profits/political-organizations/exempt-organization-filing-requirements-extending-due-date-for-form-990>.

³² The Government Integrity Fund 2014 Form 990.

³³ *Id.* at 1 (signed July 10, 2016 and received by the IRS on July 14, 2016).

³⁴ Robert Maguire, [Group That Backed Tom Cotton in '14 Got a Big Boost From Club for Growth](https://www.opensecrets.org/news/2016/06/group-that-backed-tom-cotton-in-14-got-a-big-boost-from-club-for-growth/), *Open Secrets*, June 17, 2016, available at <https://www.opensecrets.org/news/2016/06/group-that-backed-tom-cotton-in-14-got-a-big-boost-from-club-for-growth/>.

³⁵ The Government Integrity Fund 2012 Form 990, at 1 (signed Jan. 13, 2014 and received by the IRS on Jan. 21, 2014) (excerpts attached as Exhibit D).

³⁶ *Id.*, attached letter from Tom Norris, President.

³⁷ *Id.*

³⁸ The Government Integrity Fund 2013 Form 990-EZ, at 1 (signed Feb. 19, 2015) (excerpts attached as Exhibit E).

which requires disclosure of the amount spent on “political expenditures.”³⁹ “Political expenditures” include all “political campaign activities” – defined as “[a]ll activities that support or oppose candidates for elective federal, state, or local public office.”⁴⁰ Reflecting this definition, Schedule C specifically requires disclosure of “all section 527 organizations to which the filing organization made payments.”⁴¹

According to GIF’s 2014 tax return, signed by Mr. Riter on July 10, 2016 under penalty of perjury, the group spent a total of \$4,477,409 during 2014.⁴² GIF filed a Schedule C with the tax return disclosing \$1,133,208 in political expenditures.⁴³ This amount reflects part of the contributions GIF made to GIFAN, as well as the contributions it made to the Hometown Freedom Action Network and the Concrete and Portland Cement Action Network.⁴⁴

The information GIF reported on its Schedule C, however, omitted significant amounts of the group’s spending on political activities. First, GIF underreported the amount it contributed to GIFAN, claiming it only contributed \$883,208 – \$171,792 less than GIFAN reported in its FEC filings that it received from GIF. Second, GIF did not report the \$444,006 it contributed to CWA PAC on its Schedule C, instead listing on its Schedule I a \$410,000 grant to CWA, the similarly-named section 501(c)(4) organization.⁴⁵ Third, GIF failed to report on its Schedule C the \$735,000 it contributed to MAF that was immediately used for political expenditures in Rhode Island, instead listing a \$775,000 grant to MAF on its Schedule I.⁴⁶ Finally, GIF did not report any of its spending on the ad praising Sen. Cotton as political. Rather, it asserted the \$1,399,123 it apparently spent on the “issues communication[]” ad was a “program service expense” that promoted social welfare.⁴⁷

Political Activity Under Section 501(c)(4)

Section 501(c)(4) provides tax-exempt status to organizations “not organized for profit but operated exclusively for the promotion of social welfare.”⁴⁸ IRS regulations interpret the statute to mean a section 501(c)(4) organization must be “primarily engaged in promoting in

³⁹ Form 990, Part IV, Question 3; 2014 Instructions for Form 990, at 12; 2014 Instructions for Schedule C, at 1, 3.

⁴⁰ *Id.* at 1; 2014 Instructions for Form 990, at 64.

⁴¹ Form 990, Schedule C, Part I-C, Line 5.

⁴² The Government Integrity Fund, 2014 Form 990, Part I, Line 18.

⁴³ *Id.*, Schedule C, Part I-A.

⁴⁴ *Id.*, Schedule C, Part I-C.

⁴⁵ *Id.*, Schedule I, Part II. Even that mistaken disclosure is incorrect. One of the contributions CWA PAC reported to the FEC it received from GIF was a \$34,006 in-kind contribution for “direct mail” regarding then-Rep. Jack Kingston, a candidate in the 2014 Georgia Republican Senate runoff. Citizens for a Working America PAC, FEC Form 3x, 2014 October Quarterly Report, Oct. 15, 2014. GIF’s erroneous disclosure of a \$410,000 grant to CWA on its Schedule I leaves out this in-kind contribution.

⁴⁶ The Government Integrity Fund 2014 Form 990, Schedule I, Part II.

⁴⁷ *Id.*, Part IX, Line 24d.

⁴⁸ 26 U.S.C. § 501(c)(4).

some way the common good and general welfare of the people of the community.”⁴⁹ The regulations further provide that “direct or indirect participation or intervention in political campaigns on behalf of or in opposition to any candidate for public office” does not promote social welfare.⁵⁰

The IRS has not further defined the “primary activity” standard, and provides only that all the facts and circumstances are to be taken into account in determining the “primary activity” of a section 501(c)(4) organization.⁵¹ Internal IRS training materials, however, assert section 501(c) organizations (other than section 501(c)(3) charities) “may generally make expenditures for political activities as long as such activities, in conjunction with any other non-qualifying activities, do not constitute the organization’s *primary activity* (51%).”⁵²

Contributions to political organizations are direct or indirect participation or intervention in political campaigns. “Contributions to political campaign funds . . . clearly violate the prohibition on political campaign intervention” for section 501(c)(3) organizations,⁵³ and prohibited political intervention for section 501(c)(3) organizations constitutes political activity for section 501(c)(4) groups like GIF.⁵⁴ Accordingly, GIF’s contributions to GIFAN, CWA PAC, Hometown Freedom Action Network, and the Concrete and Portland Cement Action Network all constitute political campaign activities. In addition, even though MAF is not a political committee, GIF’s contributions to MAF were immediately used for political expenditures. As a result, those contributions should be treated as political spending.

GIF’s advertisement supporting Sen. Cotton also appears to constitute political activity. Advertisements and other communications that support or oppose a candidate but stop short of expressly advocating for or against the candidate’s election also can constitute political campaign

⁴⁹ Treas. Reg. § 1.501(c)(4)-1(a)(2)(i). By allowing section 501(c)(4) organizations to be only “primarily” engaged in social welfare, the regulation misinterprets the plain meaning of the word “exclusively” in the statute. This complaint analyzes GIF’s conduct using the “primarily” standard. Under a correct interpretation of the statute, GIF’s political spending unquestionably would violate its tax-exempt status.

⁵⁰ Treas. Reg. § 1.501(c)(4)-1(a)(2)(ii).

⁵¹ Rev. Rul. 68-45, 1968-1 C.B. 259.

⁵² Exempt Organizations Determinations Unit 2, Student Guide, Training 29450-002 (Rev. 9-2009), at 7-19 (emphasis added), available at [http://www.taxanalysts.com/www/freefiles.nsf/Files/EO%204.pdf/\\$file/EO%204.pdf](http://www.taxanalysts.com/www/freefiles.nsf/Files/EO%204.pdf/$file/EO%204.pdf).

⁵³ IRS, Election Year Activities and the Prohibition on Political Campaign Intervention for Section 501(c)(3) Organizations, FS-2006-17, February 2006; see also, e.g., IRS website, The Restriction of Political Campaign Intervention by Section 501(c)(3) Tax-Exempt Organizations, Mar. 5, 2014, available at [http://www.irs.gov/Charities-&-Non-Profits/Charitable-Organizations/The-Restriction-of-Political-Campaign-Intervention-by-Section-501\(c\)\(3\)-Tax-Exempt-Organizations](http://www.irs.gov/Charities-&-Non-Profits/Charitable-Organizations/The-Restriction-of-Political-Campaign-Intervention-by-Section-501(c)(3)-Tax-Exempt-Organizations).

⁵⁴ See, e.g., Notice of Proposed Rulemaking, Guidance for Tax-Exempt Social Welfare Organizations on Candidate-Related Political Activities, 78 Fed. Reg. 71535, 71536 (proposed Nov. 29, 2013) (“the IRS generally applies the same facts and circumstances analysis under section 501(c)(4)” as it does under section 501(c)(3)); Rev. Rul. 81-95 (citing examples of political intervention prohibited under section 501(c)(3) in determining political activity for section 501(c)(4) organizations); Priv. Ltr. Rul. 9652026 (Oct. 1, 1996) (“[A]ny activities constituting prohibited political intervention by a section 501(c)(3) organization are activities that must be less than the primary activities of a section 501(c)(4) organization.”).

intervention. In Revenue Ruling 2007-41, the IRS promulgated guidance on the distinction between issue advocacy and political campaign intervention. The IRS takes into consideration all the facts and circumstances of a particular communication and identified the key factors as: (1) whether the statement identifies one or more candidates; (2) whether the statement expresses approval or disapproval for a candidate's position; (3) whether the statement is delivered close to an election; (4) whether the statement makes reference to voting or an election; (5) whether the issue addressed has been raised as an issue distinguishing candidates for an office; (6) whether the communication is part of an ongoing series of communications by the organization on the issue that are made independent of the timing of any election; and (7) whether the timing of the communication is related to a non-electoral event such as a scheduled vote on specific legislation by an officeholder running in an election.⁵⁵

GIF's advertisement identified then-Rep. Cotton, a candidate in the general election, was broadcast close to the election (but seemingly timed to avoid triggering FEC disclosure requirements), and expressed approval of Rep. Cotton and his positions. The timing of the advertisement also was not related to any non-electoral event, and it does not appear the ad was part of an ongoing series of communications by GIF on the issues of "Obamacare" or "bailouts." GIF's support for GIFAN and its pro-Cotton advertising, conducted before GIF ran its own advertisement, further suggests the ad was political. Moreover, the strong similarity between GIF's ad and the unquestionably political one broadcast by GIFAN also indicates GIF's ad was political. Despite these factors showing the ad was political, GIF maintained the advertisement was "issues communication[]" that promoted social welfare and not political activity.⁵⁶

GIF's failure to correctly classify all of its political spending is critical to its apparent attempt to avoid violating its tax-exempt status. If only the \$1,133,208 GIF admitted spending on political activity is counted, 25.3% of GIF's 2014 expenditures would have been political activity. However, GIF's additional contributions to the super PACs and to MAF clearly are political, and must be counted in evaluating GIF's spending. Including this spending increases GIF's total spending on political activity to \$2,484,006, or 55.5% of its 2014 expenditures. GIF's advertisement supporting Sen. Cotton further increases its total political spending. Even if GIF only spent \$1.1 million on the ads, as reported by *Politico*, GIF's 2014 political spending would be \$3,584,006, or 80% of its total expenditures. GIF's tax return, however, suggests it spent \$1,399,123 on those ads, which would make GIF's 2014 political spending \$3,883,129 – 86.7% of its total spending.

Violations

26 U.S.C. § 501(c)(4)

Even under the IRS's misinterpretation of section 501(c)(4), and certainly under the plain language of the statute, GIF's political activity in the 2014 election cycle exceeded the amount

⁵⁵ Rev. Rul. 2007-41; *see also* Rev. Rul. 2004-06.

⁵⁶ The Government Integrity Fund 2014 Form 990, Part IX, Line 24d.

permitted, violating the organization's tax-exempt status. If only GIF's contributions to super PACs and MAF are counted, its 2014 political spending constituted 55.5% of its total spending. GIF's spending on the ad supporting Sen. Cotton also was political, and thus its political spending was either 80% or 86.7% of its total spending in 2014.

26 U.S.C. § 6033

Tax-exempt organizations are required to file annual Form 990 tax returns, and must file them on time.⁵⁷ Those tax returns are due within four and a half months after the end of the organization's fiscal year.⁵⁸ Tax-exempt organization with more than \$1 million in gross receipts may be penalized up to \$100 per day for filing late.⁵⁹

GIF's 2014 tax return was due May 15, 2015, but the group did not file until at least July 10, 2016, 422 days later. The publicly available copy of GIF's tax return does not show any requested or granted extensions, and even if GIF was granted six months of extensions (the maximum permitted), its 2014 tax return still was nearly eight months late. In addition, GIF's gross receipts were more than \$1 million.⁶⁰ As a result, GIF's should be penalized at least \$42,200 for failing to file its 2014 tax return on time. GIF also filed its 2012 tax return 243 days late, and even after assuring the IRS its returns would be filed on time in the future, filed its 2013 tax return at least 280 days late. The IRS should therefore consider imposing additional penalties on GIF.

26 U.S.C. § 6652

Under the Code, a tax-exempt organization that, without reasonable cause, fails to include any of the information required on a Form 990 tax return or fails to provide the correct information, is liable for civil penalties.⁶¹ GIF failed to report as political campaign activities on its 2014 tax return: (1) the additional \$171,792 it contributed to GIFAN; (2) its \$444,006 contribution to CWA PAC; (3) the \$735,000 it contributed to MAF that was immediately used for political expenditures; and (4) the between \$1,100,000 and \$1,399,123 it spent on the pro-Cotton ad. Accordingly, GIF appears to have violated 26 U.S.C. § 6652 and should be subject to monetary penalties.

26 U.S.C. § 7206

Under the Code, any person who "[w]illfully makes and subscribes any return, statement, or other document, which contains or is verified by a written declaration that it is made under the penalties of perjury, and which he does not believe to be true and correct as to every material

⁵⁷ 26 U.S.C. § 6033(a)(1); Treas. Reg. § 1-6033-2(a).

⁵⁸ Treas. Reg. § 1-6033-2(e).

⁵⁹ 26 U.S.C. § 6033(n); 26 U.S.C. § 6652(c)(1)(A)(ii); Treas. Reg. § 1-6033-2(f). The maximum penalty for late filing for a group with gross receipts of more than \$1 million is \$50,000. 26 U.S.C. § 6652(c)(1)(A)(ii).

⁶⁰ The Government Integrity Fund 2014 Form 990, Part I, Line 12.

⁶¹ 26 U.S.C. §§ 6652(c)(1)(A)(ii), 6652(c)(4); *see also* 2014 Instructions for Form 990, at 6.

matter,” is guilty of a felony and subject to up to three years in prison and a fine of up to \$100,000.⁶² The money spent on political campaign activities a tax-exempt organization reports to the IRS on its Schedule C is material for several reasons, including: (1) the amounts reported can be used by the IRS to determine whether the organization is complying with its tax-exempt status; (2) the amount an organization expended on section 527 exempt activities in part determines exempt function taxes the organization must pay;⁶³ and (3) accurate public disclosure of the amount of political activity conducted by tax-exempt organizations is critical to the objective of transparency that underlies the reporting required on Form 990.⁶⁴

GIF’s 2014 Form 990 was signed by Mr. Riter under a written declaration that it was made under penalty of perjury, and that Mr. Riter had examined the return and it was true, correct, and complete to the best of his knowledge.⁶⁵ The tax return, however, appears to be false and incorrect as to the material matter of the amount GIF spent on political campaign activities in 2014.

GIF’s representations appear to be willful. As chairman of GIF, president of CWA, and an officer or director of other tax-exempt organizations, Mr. Riter has significant experience filing Form 990 tax returns. In addition, Mr. Riter is familiar with political campaign activities as an officer, director, or treasurer of several political action committees. GIF claimed it contributed \$171,792 less than it actually gave to GIFAN, and reported contributions to CWA PAC, another super PAC, as contributions to the non-profit CWA on its Schedule I. GIF or Mr. Riter have relationships with these groups, making it unlikely the misrepresentations on GIF’s tax return were accidental. GIF also failed to report contributions to another non-profit that were immediately used for political expenditures on its Schedule C and, despite strong evidence to the contrary, claimed that the advertisement supporting Sen. Cotton was a non-political “issues communication[.]” Moreover, GIF had a strong motive to misrepresent its political spending – counting them makes the group’s political spending more than 50% of its total expenditures, a violation of its tax-exempt status. Accordingly, the amount GIF reported spending on political activity appears to be willfully false.

18 U.S.C. § 1001

Federal law further prohibits anyone from “knowingly and willfully” making “any materially false, fictitious, or fraudulent statement or representation” in any matter within the jurisdiction of the executive, legislative, or judicial branch.⁶⁶ The prohibition also includes anyone who “falsifies, conceals, or covers up by any trick, scheme, or device a material fact.”⁶⁷ Violations are punishable by up to five years in prison.⁶⁸ By falsely stating the amount GIF

⁶² 26 U.S.C. § 7206(1).

⁶³ 26 U.S.C. § 527(f)(1).

⁶⁴ IRS, Background Paper, Summary of Form 990 Redesign Process, Aug. 19, 2008, at 1.

⁶⁵ The Government Integrity Fund 2014 Form 990, Part II.

⁶⁶ 18 U.S.C. § 1001(a)(2).

⁶⁷ 18 U.S.C. § 1001(a)(1).

⁶⁸ *Id.*

Hon. John A. Koskinen
October 24, 2016
Page 11

spent on political campaign activities in 2014, Mr. Riter and GIF appear to have violated 18 U.S.C. § 1001.

Conclusion

Based on the publicly available information, GIF's activities do not comport with its claimed status as a section 501(c)(4) tax-exempt organization. Therefore, the IRS should investigate GIF and, should it find that GIF has violated its tax-exempt status, take appropriate action, which may include revoking its section 501(c)(4) status, imposing any applicable excise taxes under section 4958 for excess benefit transactions, and treating GIF as a taxable corporation or a section 527 political organization. Further, it appears GIF and Mr. Riter falsely represented the amount GIF spent on political activity in 2014 on its tax return. The IRS also should investigate GIF and Mr. Riter and, should it find they made false or incomplete statements on GIF's tax return, take appropriate action, including but not limited to referring this matter to the Department of Justice for prosecution. GIF also filed its 2014 tax return at least 422 days late and apparently was not granted any extensions, and filed its 2012 and 2013 tax returns months late, and thus should be liable for at least \$42,200 in penalties.

Thank you for your prompt attention to this matter.

Sincerely,



Noah Bookbinder
Executive Director
Citizens for Responsibility and Ethics in Washington

Encls.

cc: IRS-EO Classification
Tamara W. Ashford, Acting Assistant Attorney General,
Tax Division, Department of Justice

EXHIBIT A

Return of Organization Exempt From Income Tax

Under section 501(c), 527, or 4947(a)(1) of the Internal Revenue Code (except private foundations)
 ▶ Do not enter social security numbers on this form as it may be made public.
 ▶ Information about Form 990 and its instructions is at www.irs.gov/form990.

2014

Open to Public Inspection

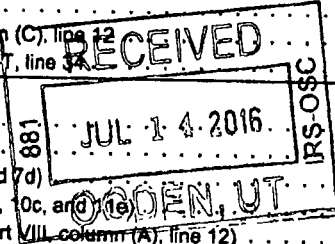
Department of the Treasury
Internal Revenue Service

A For the 2014 calendar year, or tax year beginning 2014, and ending

B Check if applicable: <input type="checkbox"/> Address change <input type="checkbox"/> Name change <input type="checkbox"/> Initial return <input type="checkbox"/> Final return/terminated <input type="checkbox"/> Amended return <input type="checkbox"/> Application pending	C Name of organization THE GOVERNMENT INTEGRITY FUND Doing business as Number and street (or P.O. box if mail is not delivered to street address) Room/suite PO Box 10181 City or town, state or province, country, and ZIP or foreign postal code COLUMBUS OH 43215		D Employer identification number 45-2042274
	F Name and address of principal officer JOEL RITER PO BOX 10181 COLUMBUS OH 43215		E Telephone number (614) 636-1873
	I Tax-exempt status 501(c)(3) <input checked="" type="checkbox"/> 501(c) (4) (insert no) 4947(a)(1) or 527		G Gross receipts \$ 4,709,000.
	J Website: N/A		H(a) Is this a group return for subordinates? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No H(b) Are all subordinates included? <input type="checkbox"/> Yes <input type="checkbox"/> No If "No," attach a list. (see instructions) H(c) Group exemption number ▶
K Form of organization. <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Trust <input type="checkbox"/> Association <input type="checkbox"/> Other ▶		L Year of formation. 2011	M State of legal domicile OH

Part I Summary

	1 Briefly describe the organization's mission or most significant activities: TO CONDUCT RESEARCH AND SUPPORT THE PUBLIC ABOUT VARIOUS PUBLIC POLICY ISSUES ACROSS THE UNITED STATES		
Activities & Governance	2 Check this box <input type="checkbox"/> if the organization discontinued its operations or disposed of more than 25% of its net assets.		
	3 Number of voting members of the governing body (Part VI, line 1a)	3	3
	4 Number of independent voting members of the governing body (Part VI, line 1b)	4	3
	5 Total number of individuals employed in calendar year 2014 (Part V, line 2a)	5	5
	6 Total number of volunteers (estimate if necessary)	6	5
	7a Total unrelated business revenue from Part VIII, column (C), line 12	7a	0.
	7b Net unrelated business taxable income from Form 990-T, line 34	7b	0.
Revenue	8 Contributions and grants (Part VIII, line 1h)	Prior Year	Current Year
	9 Program service revenue (Part VIII, line 2g)	25,000.	4,709,000.
	10 Investment income (Part VIII, column (A), lines 3, 4, and 7d)		
	11 Other revenue (Part VIII, column (A), lines 5, 6d, 8c, 9c, 10c, and 10e)		
	12 Total revenue — add lines 8 through 11 (must equal Part VIII, column (A), line 12)	25,000.	4,709,000.
Expenses	13 Grants and similar amounts paid (Part IX, column (A), lines 1-3)	25,280.	1,202,500.
	14 Benefits paid to or for members (Part IX, column (A), line 4)		
	15 Salaries, other compensation, employee benefits (Part IX, column (A), lines 5-10)		
	16a Professional fundraising fees (Part IX, column (A), line 11a)		
	b Total fundraising expenses (Part IX, column (D), line 25) ▶		0.
	17 Other expenses (Part IX, column (A), lines 11a-11d, 11f-24e)	299,194.	3,274,909.
	18 Total expenses. Add lines 13-17 (must equal Part IX, column (A), line 25)	324,474.	4,477,409.
19 Revenue less expenses. Subtract line 18 from line 12	-299,474.	231,591.	
Net Assets or Fund Balances	20 Total assets (Part X, line 16)	Beginning of Current Year	End of Year
	21 Total liabilities (Part X, line 26)	35,430.	267,021.
	22 Net assets or fund balances. Subtract line 21 from line 20	35,430.	267,021.



Part II Signature Block

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.

Sign Here	Signature of officer <i>Joel Riter</i>	Date 07/10/2016
	Joel Riter, Chairman Type or print name and title.	

Paid Preparer Use Only	Print/Type preparer's name BRAD J. ELGIN	Preparer's signature <i>Brad Elgin</i>	Date 7/10/16	Check <input type="checkbox"/> if self-employed	PTIN P01377405
	Firm's name MICHALAK AND CO. CPA		Firm's EIN ▶ 31-1616376		
	Firm's address PO BOX 645 GROVE CITY OH 43123		Phone no		

May the IRS discuss this return with the preparer shown above? (see instructions) Yes No

SCANNED JUL 28 2016

Part VII Compensation of Officers, Directors, Trustees, Key Employees, Highest Compensated Employees, and Independent Contractors

Check if Schedule O contains a response or note to any line in this Part VII

Section A. Officers, Directors, Trustees, Key Employees, and Highest Compensated Employees

1 **Complete this table for all persons required to be listed. Report compensation for the calendar year ending with or within the organization's tax year.**

- List all of the organization's current officers, directors, trustees (whether individuals or organizations), regardless of amount of compensation. Enter -0- in columns (D), (E), and (F) if no compensation was paid.
- List all of the organization's current key employees, if any. See instructions for definition of 'key employee.'
- List the organization's five current highest compensated employees (other than an officer, director, trustee, or key employee) who received reportable compensation (Box 5 of Form W-2 and/or Box 7 of Form 1099-MISC) of more than \$100,000 from the organization and any related organizations.
- List all of the organization's former officers, key employees, and highest compensated employees who received more than \$100,000 of reportable compensation from the organization and any related organizations.
- List all of the organization's former directors or trustees that received, in the capacity as a former director or trustee of the organization, more than \$10,000 of reportable compensation from the organization and any related organizations.

List persons in the following order: individual trustees or directors; institutional trustees; officers; key employees; highest compensated employees; and former such persons.

Check this box if neither the organization nor any related organization compensated any current officer, director, or trustee.

(A) Name and Title	(B) Average hours per week (list any hours for related organizations below dotted line)	(C) Position (do not check more than one box, unless person is both an officer and a director/trustee)						(D) Reportable compensation from the organization (W-2/1099-MISC)	(E) Reportable compensation from related organizations (W-2/1099-MISC)	(F) Estimated amount of other compensation from the organization and related organizations
		Individual trustee or director	Institutional trustee	Officer	Key employee	Highest compensated employee	Former			
(1) JOEL RITER CHAIRMAN	2.00	X		X				0.	0.	0.
(2) JAMES GEDDES TRUSTEE	2.00	X		X				0.	0.	0.
(3) BRAD ELGN TREASURER	2.00	X		X				0.	0.	0.
(4)										
(5)										
(6)										
(7)										
(8)										
(9)										
(10)										
(11)										
(12)										
(13)										
(14)										

Part VII Section A. Officers, Directors, Trustees, Key Employees, and Highest Compensated Employees (continued)

(A) Name and title	(B) Average hours per week (list any hours for related organizations below dotted line)	(C) Position (do not check more than one box, unless person is both an officer and a director/trustee)					(D) Reportable compensation from the organization (W-2/1099-MISC)	(E) Reportable compensation from related organizations (W-2/1099-MISC)	(F) Estimated amount of other compensation from the organization and related organizations
		Individual trustee or director	Institutional trustee	Officer	Key employee	Highest compensated employee			
(15)									
(16)									
(17)									
(18)									
(19)									
(20)									
(21)									
(22)									
(23)									
(24)									
(25)									
1 b Sub-total									
c Total from continuation sheets to Part VII, Section A						0.	0.	0.	
d Total (add lines 1b and 1c)						0.	0.	0.	

2 Total number of individuals (including but not limited to those listed above) who received more than \$100,000 of reportable compensation from the organization

	Yes	No
3 Did the organization list any former officer, director, or trustee, key employee, or highest compensated employee on line 1a? If 'Yes,' complete Schedule J for such individual		X
4 For any individual listed on line 1a, is the sum of reportable compensation and other compensation from the organization and related organizations greater than \$150,000? If 'Yes' complete Schedule J for such individual		X
5 Did any person listed on line 1a receive or accrue compensation from any unrelated organization or individual for services rendered to the organization? If 'Yes,' complete Schedule J for such person		X

Section B. Independent Contractors

1 Complete this table for your five highest compensated independent contractors that received more than \$100,000 of compensation from the organization. Report compensation for the calendar year ending with or within the organization's tax year.

(A) Name and business address	(B) Description of services	(C) Compensation
TARGET ENTERPRISES 15260 VENTURA BLVD STE 1240 SHERMAN OAKS CA 91403	CONSULTING	1,399,123.
C5 CREATIVE CONSULTING 3290 NORTHSIDE PKWY STE 675 ATLANTA GA 30327	CONSULTING	256,512.
CAPITAL CORNERED 137 FAIRHAVEN ROAD CONCORD MA 01742	CONSULTING	119,500.

2 Total number of independent contractors (including but not limited to those listed above) who received more than \$100,000 of compensation from the organization

Part IX Statement of Functional Expenses

Section 501(c)(3) and 501(c)(4) organizations must complete all columns. All other organizations must complete column (A).
 Check if Schedule O contains a response or note to any line in this Part IX . . .

Do not include amounts reported on lines 6b, 7b, 8b, 9b, and 10b of Part VIII.	(A) Total expenses	(B) Program service expenses	(C) Management and general expenses	(D) Fundraising expenses
1 Grants and other assistance to domestic organizations and domestic governments. See Part IV, line 21	1,202,500.	1,202,500.		
2 Grants and other assistance to domestic individuals. See Part IV, line 22				
3 Grants and other assistance to foreign organizations, foreign governments, and foreign individuals. See Part IV, lines 15 and 16				
4 Benefits paid to or for members				
5 Compensation of current officers, directors, trustees, and key employees				
6 Compensation not included above, to disqualified persons (as defined under section 4958(f)(1)) and persons described in section 4958(c)(3)(B)				
7 Other salaries and wages				
8 Pension plan accruals and contributions (include section 401(k) and 403(b) employer contributions)				
9 Other employee benefits				
10 Payroll taxes				
11 Fees for services (non-employees):				
a Management	638,550.	638,550.	0.	0.
b Legal	54,075.	24,000.	30,075.	0.
c Accounting	10,619.	0.	10,619.	0.
d Lobbying				
e Professional fundraising services. See Part IV, line 17				
f Investment management fees				
g Other. (If line 11g amt exceeds 10% of line 25, column (A) amount, list line 11g expenses on Schedule O)				
12 Advertising and promotion				
13 Office expenses	3,844.	0.	3,844.	0.
14 Information technology	3,550.	0.	3,550.	0.
15 Royalties				
16 Occupancy	4,000.	0.	4,000.	0.
17 Travel	23,100.	0.	23,100.	0.
18 Payments of travel or entertainment expenses for any federal, state, or local public officials				
19 Conferences, conventions, and meetings				
20 Interest				
21 Payments to affiliates				
22 Depreciation, depletion, and amortization				
23 Insurance				
24 Other expenses. Itemize expenses not covered above (List miscellaneous expenses in line 24e. If line 24e amount exceeds 10% of line 25, column (A) amount, list line 24e expenses on Schedule O.)				
a SCHEDULE C EXPENSES	1,133,208.	0.	1,133,208.	0.
b MISCELLANEOUS	3,037.	0.	3,037.	0.
c TELEPHONE	1,068.	0.	1,068.	0.
d ISSUES COMMUNICATIONS	1,399,123.	1,399,123.	0.	0.
e All other expenses	735.	0.	735.	0.
25 Total functional expenses. Add lines 1 through 24e	4,477,409.	3,264,173.	1,213,236.	0.
26 Joint costs. Complete this line only if the organization reported in column (B) joint costs from a combined educational campaign and fundraising solicitation. Check here <input type="checkbox"/> if following SOP 98-2 (ASC 958-720)				

SCHEDULE C
(Form 990 or 990-EZ)

Political Campaign and Lobbying Activities

OMB No. 1545-0047

For Organizations Exempt From Income Tax Under section 501(c) and section 527

2014

Department of the Treasury
Internal Revenue Service

▶ **Complete if the organization is described below. ▶ Attach to Form 990 or Form 990-EZ.**
▶ Information about Schedule C (Form 990 or 990-EZ) and its instructions is at www.irs.gov/form990.

Open to Public Inspection

If the organization answered 'Yes,' to Form 990, Part IV, line 3, or Form 990-EZ, Part V, line 46 (Political Campaign Activities), then

- Section 501(c)(3) organizations: Complete Parts I-A and B. Do not complete Part I-C.
- Section 501(c) (other than section 501(c)(3)) organizations: Complete Parts I-A and C below. Do not complete Part I-B.
- Section 527 organizations: Complete Part I-A only.

If the organization answered 'Yes,' to Form 990, Part IV, line 4, or Form 990-EZ, Part VI, line 47 (Lobbying Activities), then

- Section 501(c)(3) organizations that have filed Form 5768 (election under section 501(h)): Complete Part II-A. Do not complete Part II-B.
- Section 501(c)(3) organizations that have NOT filed Form 5768 (election under section 501(h)): Complete Part II-B. Do not complete Part II-A.

If the organization answered 'Yes,' to Form 990, Part IV, line 5 (Proxy Tax) (see instructions) or Form 990-EZ, Part V, line 35c (Proxy Tax) (see instructions), then

- Section 501(c)(4), (5), or (6) organizations: Complete Part III.

Name of organization: **THE GOVERNMENT INTEGRITY FUND** Employer identification number: **45-2042274**

Part I-A Complete if the organization is exempt under section 501(c) or is a section 527 organization.

- 1 Provide a description of the organization's direct and indirect political campaign activities in Part IV.
- 2 Political expenditures ▶ \$ 1,133,208.
- 3 Volunteer hours 50

Part I-B Complete if the organization is exempt under section 501(c)(3).

- 1 Enter the amount of any excise tax incurred by the organization under section 4955 ▶ \$ _____
- 2 Enter the amount of any excise tax incurred by organization managers under section 4955 ▶ \$ _____
- 3 If the organization incurred a section 4955 tax, did it file Form 4720 for this year? Yes No
- 4a Was a correction made? Yes No
- b If 'Yes,' describe in Part IV.

Part I-C Complete if the organization is exempt under section 501(c), except section 501(c)(3).

- 1 Enter the amount directly expended by the filing organization for section 527 exempt function activities ▶ \$ 0.
- 2 Enter the amount of the filing organization's funds contributed to other organizations for section 527 exempt function activities ▶ \$ 1,133,208.
- 3 Total exempt function expenditures. Add lines 1 and 2. Enter here and on Form 1120-POL, line 17b ▶ \$ 1,133,208.
- 4 Did the filing organization file Form 1120-POL for this year? Yes No
- 5 Enter the names, addresses and employer identification number (EIN) of all section 527 political organizations to which the filing organization made payments. For each organization listed, enter the amount paid from the filing organization's funds. Also enter the amount of political contributions received that were promptly and directly delivered to a separate political organization, such as a separate segregated fund or a political action committee (PAC). If additional space is needed, provide information in Part IV.

(a) Name	(b) Address	(c) EIN	(d) Amount paid from filing organization's funds. If none, enter -0-	(e) Amount of political contributions received and promptly and directly delivered to a separate political organization. If none, enter -0-
(1) HOMETOWN FREEDOM ACTION NETWORK	PO BOX 75727 WASHINGTON DC 20013	46-0950894	165,000.	0.
(2) GOVERNMENT INTEGRITY FUND ACTION NETWORK	137 EAST STATE STREET COLUMBUS OH 43215	45-2042274	883,208.	0.
(3) CONCRETE AND PORTLAND CEMENT ACTION NETWORK	PO BOX 75650 WASHINGTON DC 20013	47-1788700	85,000.	0.
(4)				
(5)				
(6)				

Part II-A Complete if the organization is exempt under section 501(c)(3) and filed Form 5768 (election under section 501(h)).

- A Check if the filing organization belongs to an affiliated group (and list in Part IV each affiliated group member's name, address, EIN, expenses, and share of excess lobbying expenditures).
- B Check if the filing organization checked box A and 'limited control' provisions apply.

Limits on Lobbying Expenditures
(The term 'expenditures' means amounts paid or incurred.)

- 1 a Total lobbying expenditures to influence public opinion (grass roots lobbying)
- b Total lobbying expenditures to influence a legislative body (direct lobbying)
- c Total lobbying expenditures (add lines 1a and 1b)
- d Other exempt purpose expenditures
- e Total exempt purpose expenditures (add lines 1c and 1d)
- f Lobbying nontaxable amount. Enter the amount from the following table in both columns

If the amount on line 1e, column (a) or (b) is:	The lobbying nontaxable amount is:
Not over \$500,000	20% of the amount on line 1e
Over \$500,000 but not over \$1,000,000	\$100,000 plus 15% of the excess over \$500,000
Over \$1,000,000 but not over \$1,500,000	\$175,000 plus 10% of the excess over \$1,000,000.
Over \$1,500,000 but not over \$17,000,000	\$225,000 plus 5% of the excess over \$1,500,000
Over \$17,000,000	\$1,000,000

- g Grassroots nontaxable amount (enter 25% of line 1f)
- h Subtract line 1g from line 1a. If zero or less, enter -0-
- i Subtract line 1f from line 1c. If zero or less, enter -0-

j If there is an amount other than zero on either line 1h or line 1i, did the organization file Form 4720 reporting section 4911 tax for this year?

Yes No

4-Year Averaging Period Under Section 501(h)
(Some organizations that made a section 501(h) election do not have to complete all of the five columns below. See the instructions for lines 2a through 2f.)

Lobbying Expenditures During 4-Year Averaging Period

Calendar year (or fiscal year beginning in)	(a) 2011	(b) 2012	(c) 2013	(d) 2014	(e) Total
2 a Lobbying non-taxable amount					
b Lobbying ceiling amount (150% of line 2a, column (a))					
c Total lobbying expenditures					
d Grassroots nontaxable amount					
e Grassroots ceiling amount (150% of line 2d, column (a))					
f Grassroots lobbying expenditures					

BAA

Part II-B Complete if the organization is exempt under section 501(c)(3) and has NOT filed Form 5768 (election under section 501(h)).

For each 'Yes' response to lines 1a through 1i below, provide in Part IV a detailed description of the lobbying activity.

	(a)		(b)
	Yes	No	Amount
1 During the year, did the filing organization attempt to influence foreign, national, state or local legislation, including any attempt to influence public opinion on a legislative matter or referendum, through the use of:			
a Volunteers?			
b Paid staff or management (include compensation in expenses reported on lines 1c through 1i)?			
c Media advertisements?			
d Mailings to members, legislators, or the public?			
e Publications, or published or broadcast statements?			
f Grants to other organizations for lobbying purposes?			
g Direct contact with legislators, their staffs, government officials, or a legislative body?			
h Rallies, demonstrations, seminars, conventions, speeches, lectures, or any similar means?			
i Other activities?			
j Total. Add lines 1c through 1i			
2a Did the activities in line 1 cause the organization to be not described in section 501(c)(3)?			
b If 'Yes,' enter the amount of any tax incurred under section 4912			
c If 'Yes,' enter the amount of any tax incurred by organization managers under section 4912			
d If the filing organization incurred a section 4912 tax, did it file Form 4720 for this year?			

Part III-A Complete if the organization is exempt under section 501(c)(4), section 501(c)(5), or section 501(c)(6).

	Yes	No
1 Were substantially all (90% or more) dues received nondeductible by members?		X
2 Did the organization make only in-house lobbying expenditures of \$2,000 or less?	X	
3 Did the organization agree to carry over lobbying and political expenditures from the prior year?		X

Part III-B Complete if the organization is exempt under section 501(c)(4), section 501(c)(5), or section 501(c)(6) and if either (a) BOTH Part III-A, lines 1 and 2, are answered 'No,' OR (b) Part III-A, line 3, is answered 'Yes.'

1 Dues, assessments and similar amounts from members	1	
2 Section 162(e) nondeductible lobbying and political expenditures (do not include amounts of political expenses for which the section 527(f) tax was paid).		
a Current year	2 a	
b Carryover from last year	2 b	
c Total	2 c	
3 Aggregate amount reported in section 6033(e)(1)(A) notices of nondeductible section 162(e) dues	3	
4 If notices were sent and the amount on line 2c exceeds the amount on line 3, what portion of the excess does the organization agree to carryover to the reasonable estimate of nondeductible lobbying and political expenditure next year?	4	
5 Taxable amount of lobbying and political expenditures (see instructions)	5	

Part IV Supplemental Information

Provide the descriptions required for Part I-A, line 1; Part I-B, line 4; Part I-C, line 5; Part II-A (affiliated group list); Part II-A, lines 1 and 2 (see instructions); and Part II-B, line 1. Also, complete this part for any additional information.

Pt I-A Line 1 THE ORGANIZATION MADE CONTRIBUTIONS TO THREE INDEPENDENT EXPENDITURE ONLY POLITICAL ACTION COMMITTEES

SCHEDULE I
(Form 990)

Department of the Treasury
Internal Revenue Service

**Grants and Other Assistance to Organizations,
Governments, and Individuals in the United States**
Complete if the organization answered 'Yes' to Form 990, Part IV, line 21 or 22.
▶ Attach to Form 990.

OMB No 1545-0047

2014



▶ Information about Schedule I (Form 990) and its instructions is at www.irs.gov/form990.

Employer identification number

45-2042274

THE GOVERNMENT INTEGRITY FUND

General Information on Grants and Assistance

- 1 Does the organization maintain records to substantiate the amount of the grants or assistance, the grantees' eligibility for the grants or assistance, and the selection criteria used to award the grants or assistance?
 2 Describe in Part IV the organization's procedures for monitoring the use of grant funds in the United States.

..... Yes No

Part II Grants and Other Assistance to Domestic Organizations and Domestic Governments. Complete if the organization answered 'Yes' to Form 990, Part IV, line 21 for any recipient that received more than \$5,000. Part II can be duplicated if additional space is needed.

1 (a) Name and address of organization or government	(b) EIN	(c) IRC section if applicable	(d) Amount of cash grant	(e) Amount of non-cash assistance	(f) Method of valuation (book, FMV, appraisal, other)	(g) Description of non-cash assistance	(h) Purpose of grant or assistance
1) MID AMERICA FUND 44904 KACSMAR ESTATES DR ST. CLAIRSVILLE OH 43950	46-4509482	501 (C) (4)	775,000.				TO PROVIDE SUP
2) CITIZENS FOR A WORKING AM 429 N Saint ASAPH ST ALEXANDRIA VA 22314	27-0585219	501 (C) (4)	410,000.				TO PROVIDE SUP
3) CITIZENS FOR A SECURE COM PO BOX 341016 AUSTIN TX 78734	45-1582354	501 (C) (4)	12,500.				TO PROVIDE SUP
4)							
5)							
6)							
7)							
8)							

2 Enter total number of section 501(c)(3) and government organizations listed in the line 1 table

3 Enter total number of other organizations listed in the line 1 table

3
0

AA For Paperwork Reduction Act Notice, see the Instructions for Form 990.

TEEA3301 06/19/14

Schedule I (Form 990) (2014)

Part III Grants and Other Assistance to Domestic Individuals. Complete if the organization answered 'Yes' to Form 990, Part IV, line 22. Part III can be duplicated if additional space is needed.

(a) Type of grant or assistance	(b) Number of recipients	(c) Amount of cash grant	(d) Amount of non-cash assistance	(e) Method of valuation (book, FMV, appraisal, other)	(f) Description of non-cash assistance
1					
2					
3					
4					
5					
6					
7					

Part IV Supplemental Information. Provide the information required in Part I, line 2, Part III, column (b), and any other additional information.

EXHIBIT B

Form 990

Return of Organization Exempt From Income Tax

OMB No 1545-0047

Under section 501(c), 527, or 4947(a)(1) of the Internal Revenue Code (except private foundations)

2013

Department of the Treasury Internal Revenue Service

Do not enter Social Security numbers on this form as it may be made public. By law, the IRS generally cannot redact the information on the form. Information about Form 990 and its instructions is at www.irs.gov/form990

Open to Public Inspection

A For the 2013 calendar year, or tax year beginning 10-01-2013, 2013, and ending 09-30-2014

Form fields for organization details: B Check if applicable (Address change, Name change, etc.), C Name of organization (CITIZENS FOR A WORKING AMERICA INC), D Employer identification number (27-0585219), E Telephone number ((703) 310-6647), F Name and address of principal officer (JOEL RITER, 429 NORTH SAINT ASAPH ST, ALEXANDRIA, VA 22314), H(a) Is this a group return for subordinates? (No), H(b) Are all subordinates included? (No), H(c) Group exemption number, I Tax-exempt status (501(c)(4)), J Website (N/A), K Form of organization (Corporation), L Year of formation (2009), M State of legal domicile (DE)

Part I Summary

Table with 3 columns: Description, Prior Year, Current Year. Rows include: 1 Briefly describe the organization's mission... TO PROMOTE SOUND ECONOMIC POLICY...; 2 Check this box if the organization discontinued its operations...; 3-7 Summary statistics; 8-12 Revenue (Total revenue: 4,162,500); 13-19 Expenses (Total expenses: 4,201,348); 20-22 Net Assets or Fund Balances (Total assets: 47,851; Total liabilities: 0; Net assets: 47,851).

Part II Signature Block

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.

Sign Here: Signature of officer (JOEL RITER PRESIDENT), Date (2015-08-13)

Paid Preparer Use Only: Print/Type preparer's name (JOHN T LIND), Preparer's signature, Date (2015-08-13), Firm's name (CLARK SCHAEFER HACKETT & CO), Firm's address (ONE EAST FOURTH ST SUITE 1200, CINCINNATI, OH 45202), Firm's EIN (31-0800053), Phone no (513) 241-3111

May the IRS discuss this return with the preparer shown above? (see instructions) [X] Yes [] No

EXHIBIT C

EXTENDED TO NOVEMBER 16, 2015

Form **990**

Return of Organization Exempt From Income Tax
Under section 501(c), 527, or 4947(a)(1) of the Internal Revenue Code (except private foundations)

OMB No 1545-0047

2014
Open to Public Inspection

Department of the Treasury
Internal Revenue Service

Do not enter social security numbers on this form as it may be made public.
Information about Form 990 and its instructions is at www.irs.gov/form990

A For the 2014 calendar year, or tax year beginning **JAN 14, 2014** and ending **DEC 31, 2014**

B Check if applicable: <input type="checkbox"/> Address change <input type="checkbox"/> Name change <input checked="" type="checkbox"/> Initial return <input type="checkbox"/> Final return/terminated <input type="checkbox"/> Amended return <input checked="" type="checkbox"/> Application pending	C Name of organization MID AMERICA FUND, INC.	D Employer identification number 46-4509482
	Doing business as	E Telephone number 740-994-5077
	Number and street (or P.O. box if mail is not delivered to street address) Room/suite 44904 KACSMAR ESTATES DRIVE	G Gross receipts \$ 2,000,000.
	City or town, state or province, country, and ZIP or foreign postal code ST. CLAIRSVILLE, OH 43950	H(a) Is this a group return for subordinates? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No H(b) Are all subordinates included? <input type="checkbox"/> Yes <input type="checkbox"/> No If "No," attach a list. (see instructions) H(c) Group exemption number ▶
I Tax-exempt status: <input type="checkbox"/> 501(c)(3) <input checked="" type="checkbox"/> 501(c) (4) ◀ (insert no.) <input type="checkbox"/> 4947(a)(1) or <input type="checkbox"/> 527		
J Website: ▶ N/A		
K Form of organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Trust <input type="checkbox"/> Association <input type="checkbox"/> Other ▶		L Year of formation: 2014 M State of legal domicile: OH

Part I Summary		Prior Year	Current Year
Activities & Governance	1 Briefly describe the organization's mission or most significant activities: THE ORGANIZATION ENGAGED IN GRASSROOTS ADVOCACY EFFORTS ON TAXES, GOVERNMENT SPENDING, AND		
	2 Check this box <input type="checkbox"/> if the organization discontinued its operations or disposed of more than 25% of its net assets.		
	3 Number of voting members of the governing body (Part VI, line 1a)	3	2
	4 Number of independent voting members of the governing body (Part VI, line 1b)	4	2
	5 Total number of individuals employed in calendar year 2014 (Part V, line 2a)	5	0
	6 Total number of volunteers (estimate if necessary)	6	0
	7a Total unrelated business revenue from Part VIII, column (C), line 12	7a	0.
b Net unrelated business taxable income from Form 990-T, line 34	7b	0.	
Revenue	8 Contributions and grants (Part VIII, line 1h)		2,000,000.
	9 Program service revenue (Part VIII, line 2g)		0.
	10 Investment income (Part VIII, column (A), lines 3, 4, and 7d)		0.
	11 Other revenue (Part VIII, column (A), lines 5, 6d, 8c, 9c, 10c, and 11e)		0.
	12 Total revenue - add lines 8 through 11 (must equal Part VIII, column (A), line 12)		2,000,000.
Expenses	13 Grants and similar amounts paid (Part IX, column (A), lines 1-3)		0.
	14 Benefits paid to or for members (Part IX, column (A), line 4)		0.
	15 Salaries, other compensation, employee benefits (Part IX, column (A), lines 5-10)		0.
	16a Professional fundraising fees (Part IX, column (A), line 11e)		0.
	b Total fundraising expenses (Part IX, column (D), line 25) ▶ 14,250.		
	17 Other expenses (Part IX, column (A), lines 11a-11d, 11f-24e)		1,999,316.
18 Total expenses. Add lines 13-17 (must equal Part IX, column (A), line 25)		1,999,316.	
19 Revenue less expenses. Subtract line 18 from line 12		684.	
Net Assets or Fund Balances	20 Total assets (Part X, line 16)	Beginning of Current Year	End of Year
	21 Total liabilities (Part X, line 26)		684.
	22 Net assets or fund balances. Subtract line 21 from line 20		0.

Part II Signature Block

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.

Sign Here	Signature of officer <i>[Signature]</i>	Date 11/16/15
	DEXTER J. VAUGHN, PRESIDENT Type or print name and title	

Paid Preparer Use Only	Print/Type preparer's name JOHN T. LIND	Preparer's signature JOHN T. LIND	Date 11/14/15	Check <input type="checkbox"/> if self-employed	PTIN P00099011
	Firm's name ▶ CLARK, SCHAEFER, HACKETT & CO.	Firm's EIN ▶ 31-0800053	Phone no. 513-241-3111		
Firm's address ▶ ONE EAST FOURTH ST, SUITE 1200 CINCINNATI, OH 45202					

May the IRS discuss this return with the preparer shown above? (see instructions) Yes No

SEE SCHEDULE O FOR ORGANIZATION MISSION STATEMENT CONTINUATION

SCANNED DEC 14 2015

gib 9

SCHEDULE C
(Form 990 or 990-EZ)

Political Campaign and Lobbying Activities

OMB No 1545-0047

2014

Open to Public Inspection

Department of the Treasury
Internal Revenue Service

For Organizations Exempt From Income Tax Under section 501(c) and section 527
 ▶ Complete if the organization is described below. ▶ Attach to Form 990 or Form 990-EZ.
 ▶ Information about Schedule C (Form 990 or 990-EZ) and its instructions is at www.irs.gov/form990.

If the organization answered "Yes," to Form 990, Part IV, line 3, or Form 990-EZ, Part V, line 46 (Political Campaign Activities), then

- Section 501(c)(3) organizations: Complete Parts I-A and B. Do not complete Part I-C.
- Section 501(c) (other than section 501(c)(3)) organizations: Complete Parts I-A and C below. Do not complete Part I-B.
- Section 527 organizations: Complete Part I-A only.

If the organization answered "Yes," to Form 990, Part IV, line 4, or Form 990-EZ, Part VI, line 47 (Lobbying Activities), then

- Section 501(c)(3) organizations that have filed Form 5768 (election under section 501(h)): Complete Part II-A. Do not complete Part II-B.
- Section 501(c)(3) organizations that have NOT filed Form 5768 (election under section 501(h)): Complete Part II-B. Do not complete Part II-A.

If the organization answered "Yes," to Form 990, Part IV, line 5 (Proxy Tax) (see separate instructions) or Form 990-EZ, Part V, line 35c (Proxy Tax) (see separate instructions), then

- Section 501(c)(4), (5), or (6) organizations: Complete Part III.

Name of organization **MID AMERICA FUND, INC.** Employer identification number **46-4509482**

Part I-A Complete if the organization is exempt under section 501(c) or is a section 527 organization.

- 1 Provide a description of the organization's direct and indirect political campaign activities in Part IV.
- 2 Political expenditures ▶ \$ **874,920.**
- 3 Volunteer hours

Part I-B Complete if the organization is exempt under section 501(c)(3).

- 1 Enter the amount of any excise tax incurred by the organization under section 4955 ▶ \$
- 2 Enter the amount of any excise tax incurred by organization managers under section 4955 ▶ \$
- 3 If the organization incurred a section 4955 tax, did it file Form 4720 for this year? Yes No
- 4a Was a correction made? Yes No
- b If "Yes," describe in Part IV.

Part I-C Complete if the organization is exempt under section 501(c), except section 501(c)(3).

- 1 Enter the amount directly expended by the filing organization for section 527 exempt function activities ▶ \$ **859,920.**
- 2 Enter the amount of the filing organization's funds contributed to other organizations for section 527 exempt function activities ▶ \$ **15,000.**
- 3 Total exempt function expenditures. Add lines 1 and 2. Enter here and on Form 1120-POL, line 17b ▶ \$ **874,920.**
- 4 Did the filing organization file Form 1120-POL for this year? Yes No
- 5 Enter the names, addresses and employer identification number (EIN) of all section 527 political organizations to which the filing organization made payments. For each organization listed, enter the amount paid from the filing organization's funds. Also enter the amount of political contributions received that were promptly and directly delivered to a separate political organization, such as a separate segregated fund or a political action committee (PAC). If additional space is needed, provide information in Part IV.

(a) Name	(b) Address	(c) EIN	(d) Amount paid from filing organization's funds. If none, enter -0-	(e) Amount of political contributions received and promptly and directly delivered to a separate political organization. If none, enter -0-
MARLBOROUGH REPUBLICAN CITY COMM	MARLBOROUGH, MA 01752		15,000.	0.

For Paperwork Reduction Act Notice, see the Instructions for Form 990 or 990-EZ.

Schedule C (Form 990 or 990-EZ) 2014

SEE PART IV FOR CONTINUATION

LHA
432041
10-21-14

Part II-A Complete if the organization is exempt under section 501(c)(3) and filed Form 5768 (election under section 501(h)).

- A** Check if the filing organization belongs to an affiliated group (and list in Part IV each affiliated group member's name, address, EIN, expenses, and share of excess lobbying expenditures).
- B** Check if the filing organization checked box A and "limited control" provisions apply.

Limits on Lobbying Expenditures (The term "expenditures" means amounts paid or incurred.)		(a) Filing organization's totals	(b) Affiliated group totals												
1a Total lobbying expenditures to influence public opinion (grass roots lobbying)															
b Total lobbying expenditures to influence a legislative body (direct lobbying)															
c Total lobbying expenditures (add lines 1a and 1b)															
d Other exempt purpose expenditures															
e Total exempt purpose expenditures (add lines 1c and 1d)															
f Lobbying nontaxable amount. Enter the amount from the following table in both columns.															
<table border="1"> <thead> <tr> <th>If the amount on line 1e, column (a) or (b) is:</th> <th>The lobbying nontaxable amount is:</th> </tr> </thead> <tbody> <tr> <td>Not over \$500,000</td> <td>20% of the amount on line 1e.</td> </tr> <tr> <td>Over \$500,000 but not over \$1,000,000</td> <td>\$100,000 plus 15% of the excess over \$500,000.</td> </tr> <tr> <td>Over \$1,000,000 but not over \$1,500,000</td> <td>\$175,000 plus 10% of the excess over \$1,000,000.</td> </tr> <tr> <td>Over \$1,500,000 but not over \$17,000,000</td> <td>\$225,000 plus 5% of the excess over \$1,500,000.</td> </tr> <tr> <td>Over \$17,000,000</td> <td>\$1,000,000.</td> </tr> </tbody> </table>		If the amount on line 1e, column (a) or (b) is:	The lobbying nontaxable amount is:	Not over \$500,000	20% of the amount on line 1e.	Over \$500,000 but not over \$1,000,000	\$100,000 plus 15% of the excess over \$500,000.	Over \$1,000,000 but not over \$1,500,000	\$175,000 plus 10% of the excess over \$1,000,000.	Over \$1,500,000 but not over \$17,000,000	\$225,000 plus 5% of the excess over \$1,500,000.	Over \$17,000,000	\$1,000,000.		
If the amount on line 1e, column (a) or (b) is:	The lobbying nontaxable amount is:														
Not over \$500,000	20% of the amount on line 1e.														
Over \$500,000 but not over \$1,000,000	\$100,000 plus 15% of the excess over \$500,000.														
Over \$1,000,000 but not over \$1,500,000	\$175,000 plus 10% of the excess over \$1,000,000.														
Over \$1,500,000 but not over \$17,000,000	\$225,000 plus 5% of the excess over \$1,500,000.														
Over \$17,000,000	\$1,000,000.														
g Grassroots nontaxable amount (enter 25% of line 1f)															
h Subtract line 1g from line 1a. If zero or less, enter -0-															
i Subtract line 1f from line 1c. If zero or less, enter -0-															
j If there is an amount other than zero on either line 1h or line 1i, did the organization file Form 4720 reporting section 4911 tax for this year?		<input type="checkbox"/> Yes	<input type="checkbox"/> No												

4-Year Averaging Period Under section 501(h)
 (Some organizations that made a section 501(h) election do not have to complete all of the five columns below.
 See the separate instructions for lines 2a through 2f.)

Lobbying Expenditures During 4-Year Averaging Period					
Calendar year (or fiscal year beginning in)	(a) 2011	(b) 2012	(c) 2013	(d) 2014	(e) Total
2a Lobbying nontaxable amount					
b Lobbying ceiling amount (150% of line 2a, column(e))					
c Total lobbying expenditures					
d Grassroots nontaxable amount					
e Grassroots ceiling amount (150% of line 2d, column (e))					
f Grassroots lobbying expenditures					

Schedule C (Form 990 or 990-EZ) 2014

Part II-B Complete if the organization is exempt under section 501(c)(3) and has NOT filed Form 5768 (election under section 501(h)).

For each "Yes," response to lines 1a through 1j below, provide in Part IV a detailed description of the lobbying activity.	(a)		(b)
	Yes	No	Amount
1 During the year, did the filing organization attempt to influence foreign, national, state or local legislation, including any attempt to influence public opinion on a legislative matter or referendum, through the use of:			
a Volunteers?			
b Paid staff or management (include compensation in expenses reported on lines 1c through 1i)?			
c Media advertisements?			
d Mailings to members, legislators, or the public?			
e Publications, or published or broadcast statements?			
f Grants to other organizations for lobbying purposes?			
g Direct contact with legislators, their staffs, government officials, or a legislative body?			
h Rallies, demonstrations, seminars, conventions, speeches, lectures, or any similar means?			
i Other activities?			
j Total. Add lines 1c through 1i			
2a Did the activities in line 1 cause the organization to be not described in section 501(c)(3)?			
b If "Yes," enter the amount of any tax incurred under section 4912			
c If "Yes," enter the amount of any tax incurred by organization managers under section 4912			
d If the filing organization incurred a section 4912 tax, did it file Form 4720 for this year?			

Part III-A Complete if the organization is exempt under section 501(c)(4), section 501(c)(5), or section 501(c)(6).

	Yes	No
1 Were substantially all (90% or more) dues received nondeductible by members?		
2 Did the organization make only in-house lobbying expenditures of \$2,000 or less?		
3 Did the organization agree to carry over lobbying and political expenditures from the prior year?		

Part III-B Complete if the organization is exempt under section 501(c)(4), section 501(c)(5), or section 501(c)(6) and if either (a) BOTH Part III-A, lines 1 and 2, are answered "No," OR (b) Part III-A, line 3, is answered "Yes."

1 Dues, assessments and similar amounts from members	1	
2 Section 162(e) nondeductible lobbying and political expenditures (do not include amounts of political expenses for which the section 527(f) tax was paid).		
a Current year	2a	
b Carryover from last year	2b	
c Total	2c	
3 Aggregate amount reported in section 6033(e)(1)(A) notices of nondeductible section 162(e) dues	3	
4 If notices were sent and the amount on line 2c exceeds the amount on line 3, what portion of the excess does the organization agree to carryover to the reasonable estimate of nondeductible lobbying and political expenditure next year?	4	
5 Taxable amount of lobbying and political expenditures (see instructions)	5	

Part IV Supplemental Information

Provide the descriptions required for Part I-A, line 1; Part I-B, line 4; Part I-C, line 5; Part II-A (affiliated group list); Part II-A, lines 1 and 2 (see instructions); and Part II-B, line 1. Also, complete this part for any additional information.

PART I-C CONTINUATION FOR INCOMPLETE NAME/ADDRESS INFORMATION:

MARLBOROUGH REPUBLICAN CITY COMMITTEE

53 EDINBORO ST MARLBOROUGH, MA 01752

PART 1-C

THE ORGANIZATION MADE INDEPENDENT EXPENDITURES AND A CONTRIBUTION TO A

Part IV Supplemental Information (continued)

LOCAL POLITICAL COMMITTEE.

Lined area for supplemental information.

EXHIBIT D

Return of Organization Exempt From Income Tax

2012

Under section 501(c), 527, or 4947(a)(1) of the Internal Revenue Code (except black lung benefit trust or private foundation)

Open to Public Inspection

Department of the Treasury Internal Revenue Service

The organization may have to use a copy of this return to satisfy state reporting requirements

A For the 2012 calendar year, or tax year beginning, 2012, and ending

B Check if applicable: Address change, Name change, Initial return, Terminated, Amended return, Application pending. C Name of organization: THE GOVERNMENT INTEGRITY FUND. D Employer Identification Number: 45-2042274. E Telephone number: (614) 306-4690. F Name and address of principal officer: THOMAS NORRIS 6712 RIDPATH ROAD GROVE CITY OH 43123. G Gross receipts \$ 5,500,691. H(a) Is this a group return for affiliates? Yes No. H(b) Are all affiliates included? Yes No. I Tax-exempt status: 501(c)(3) 501(c) (4) (insert no) 4947(a)(1) or 527. J Website: N/A. K Form of organization: Corporation, Trust, Association, Other LLC. L Year of Formation: 2011. M State of legal domicile: OH.

Part I Summary

Table with columns for Activities & Governance, Revenue, Expenses, and Net Assets or Fund Balances. Rows include mission statement, membership counts, revenue breakdown, and expense breakdown. Includes a 'RECEIVED' stamp from OGDEN, UT.

Part II Signature Block

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.

Signature of officer: Thomas Norris, President, Date: 1/13/14. Preparer: BRAD ELGIN, Date: [Signature], PTIN: P01377405. Firm: TOTAL BUSINESS SOLUTIONS, PO BOX 645, GROVE CITY OH 43123. Firm's EIN: 30-0595434.

May the IRS discuss this return with the preparer shown above? (see instructions) Yes No. BAA For Paperwork Reduction Act Notice, see the separate instructions. TEEA0101 05/09/13 Form 990 (2012)

SCANNED JAN 29 2014

Handwritten initials and marks on the right side of the page.

EXHIBIT E

Form **990-EZ**

Short Form
Return of Organization Exempt From Income Tax
Under section 501(c), 527, or 4947(a)(1) of the Internal Revenue Code
(except private foundations)

OMB No 1545-1150

2013

▶ Do not enter Social Security numbers on this form as it may be made public.
▶ Information about Form 990-EZ and its instructions is at www.irs.gov/form990.

Department of the Treasury
Internal Revenue Service

Open to Public Inspection

A For the 2013 calendar year, or tax year beginning , 2013, and ending

B Check if applicable:
 Address change
 Name change
 Initial return
 Terminated
 Amended return
 Application pending

C Name of organization
THE GOVERNMENT INTEGRITY FUND
 Number and street (or P O box, if mail is not delivered to street address) Room/suite
PO Box 10181
 City or town, state or province, country, and ZIP or foreign postal code
COLUMBUS OH 43215

D Employer identification number
45-2042274

E Telephone number
(614) 306-4690

F Group Exemption Number

G Accounting Method Cash Accrual Other (specify) ▶

I Website: ▶ **N/A**

H Check if the organization is not required to attach Schedule B (Form 990, 990-EZ, or 990-PF)

J Tax-exempt status (check only one) — 501(c)(3) 501(c) (4) ◀(insert no) 4947(a)(1) or 527

K Form of organization Corporation Trust Association Other

L Add lines 5b, 6c, and 7b, to line 9 to determine gross receipts. If gross receipts are \$200,000 or more, or if total assets (Part II, column (B) below) are \$500,000 or more, file Form 990 instead of Form 990-EZ. ▶ \$ 25,000.

Part I Revenue, Expenses, and Changes in Net Assets or Fund Balances (see the instructions for Part I)
Check if the organization used Schedule O to respond to any question in this Part I

1	Contributions, gifts, grants, and similar amounts received	1	25,000.
2	Program service revenue including government fees and contracts	2	
3	Membership dues and assessments	3	
4	Investment income	4	
5 a	Gross amount from sale of assets other than inventory	5 a	
5 b	Less cost or other basis and sales expenses	5 b	
5 c	Gain or (loss) from sale of assets other than inventory (Subtract line 5b from line 5a).	5 c	
6	Gaming and fundraising events		
6 a	Gross income from gaming (attach Schedule G if greater than \$15,000)	6 a	
6 b	Gross income from fundraising events (not including \$ of contributions from fundraising events reported on line 1) (attach Schedule G if the sum of such gross income and contributions exceeds \$15,000)	6 b	
6 c	Less direct expenses from gaming and fundraising events	6 c	
6 d	Net income or (loss) from gaming and fundraising events (add lines 6a and 6b and subtract line 6c)	6 d	
7 a	Gross sales of inventory, less returns and allowances	7 a	
7 b	Less cost of goods sold	7 b	
7 c	Gross profit or (loss) from sales of inventory (Subtract line 7b from line 7a)	7 c	
8	Other revenue (describe in Schedule O)	8	
9	Total revenue. Add lines 1, 2, 3, 4, 5c, 6d, 7c, and 8. ▶	9	25,000.
10	Grants and similar amounts paid (list in Schedule O) See L-10 Stmt	10	25,280.
11	Benefits paid to or for members	11	
12	Salaries, other compensation, and employee benefits	12	
13	Professional fees and other payments to independent contractors	13	
14	Occupancy, rent, utilities, and maintenance	14	
15	Printing, publications, postage, and shipping	15	
16	Other expenses (describe in Schedule O) See Form 990-EZ, Part I, Line 16, Other Expenses	16	299,194.
17	Total expenses. Add lines 10 through 16 ▶	17	324,474.
18	Excess or (deficit) for the year (Subtract line 17 from line 9).	18	-299,474.
19	Net assets or fund balances at beginning of year (from line 27, column (A)) (must agree with end-of-year figure reported on prior year's return)	19	334,904.
20	Other changes in net assets or fund balances (explain in Schedule O)	20	
21	Net assets or fund balances at end of year. Combine lines 18 through 20. ▶	21	35,430.

BAA For Paperwork Reduction Act Notice, see the separate instructions. Form 990-EZ (2013)

SCANNED MAR 10 2015

90-5

46 Did the organization engage, directly or indirectly, in political campaign activities on behalf of or in opposition to candidates for public office? If 'Yes,' complete Schedule C, Part I

	Yes	No
46		X

Section 501(c)(3) organizations only

All section 501(c)(3) organizations must answer questions 47-49b and 52, and complete the tables for lines 50 and 51

Check if the organization used Schedule O to respond to any question in this Part VI

47 Did the organization engage in lobbying activities or have a section 501(h) election in effect during the tax year? If 'Yes,' complete Schedule C, Part II

	Yes	No
47		
48		
49 a		
49 b		

48 Is the organization a school as described in section 170(b)(1)(A)(ii)? If 'Yes,' complete Schedule E

49 a Did the organization make any transfers to an exempt non-charitable related organization?

b If 'Yes,' was the related organization a section 527 organization?

50 Complete this table for the organization's five highest compensated employees (other than officers, directors, trustees and key employees) who each received more than \$100,000 of compensation from the organization. If there is none, enter 'None'

(a) Name and title of each employee	(b) Average hours per week devoted to position	(c) Reportable compensation (Forms W-2/1099-MISC)	(d) Health benefits, contributions to employee benefit plans, and deferred compensation	e) Estimated amount of other compensation

f Total number of other employees paid over \$100,000.

51 Complete this table for the organization's five highest compensated independent contractors who each received more than \$100,000 of compensation from the organization. If there is none, enter 'None'

(a) Name and business address of each independent contractor	(b) Type of service	(c) Compensation

d Total number of other independent contractors each receiving over \$100,000.

52 Did the organization complete Schedule A? Note. All section 501(c)(3) organizations and 4947(a)(1) nonexempt charitable trusts must attach a completed Schedule A.

Yes No

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.

Sign Here: Signature of officer: Joel W. Riter Date: 2/19/2015
 Type or print name and title: Chairman

Paid Preparer Use Only: Preparer's name: BRAD J. ELGIN Preparer's signature: [Signature] Date: Check if self-employed PTIN: P01377405MO
 Firm's address: Firm's EIN: Phone no:

May the IRS discuss this return with the preparer shown above? See instructions Yes No