

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

IDF International Technologies, Inc.  
382 NE 191st St # 74906  
Miami, FL 33179  
786-220-4656  
info@idftech.com

November 20, 2019

Dear Counsel,

I'm an officer of a for-profit Florida corporation IDF International Technologies, Inc (IDF). On behalf of IDF, I request an advisory opinion regarding online advertising that mentions candidates, sitting elected officials or parties, but which is done not for the purposes of influencing the outcome of elections.

### **Background**

IDF runs online discussion forums in various markers.

One of such forums [www.OnePoliticalPlaza.com](http://www.OnePoliticalPlaza.com) is a political discussion forum.

As part of ordinary course of doing business IDF buys online advertising from technology companies such as Google (Google Ads) and similar. This advertising is in the form of Internet banner ads, pay-per-click ads, display ads, etc. All advertising is strictly on the Internet.

The purpose of buying advertising is to drive traffic and bring new users to our forums. Subsequently, once those new users become regulars on our forums their online activity allows us in turn to sell advertising to technology companies, such as Google (AdSense) and similar.

This is our business model for all our forums: buying advertising, providing a communications platform for the users, and selling advertising. With the value proposition for the users being a place where they can communicate with each other regarding some specific topic (the niche of the forum).

So a fishing forum (another project we run) would be attracting people who are interested in talking about fishing. And a political forum would be attracting people who are interested in talking about politics.

Being a political discussion forum this particular project raises some questions we would like clarified.

As a for-profit corporation we do not have a public position on any political issue, party, candidate. All content on our website is posted by our users without any political influence from our corporation. We are not affiliated with any party, candidate, political committee. We serve merely as a communications platform, and we buy and sell online advertising solely for the purpose of running our business.

In order to be successful, all advertising must be relevant to the target audience. So if our business goal is to attract people interested in discussing politics, then we need to appeal to the users by mentioning political candidates, sitting elected officials and parties.

On our political forum ([www.OnePoliticalPlaza.com](http://www.OnePoliticalPlaza.com)) we do not steer the conversation in any particular direction. All posts and opinions are of the users and generally represent all sides and views on any issue that is being debated. Most of it is discussion of political news and current events.

All advertising we buy is meant to invoke emotions and interest from people who want to read and/or discuss political content in hopes of them becoming users on our forum. Not to influence the outcome of any election.

Below, you'll find some examples of the text of the online ads that mention candidates and/or sitting elected officials to show the overall tone and angle of our advertising.

The idea of these ads is to act as a voice of our existing user who might "Love Trump" or "Hate Biden", or vice versa. And that user is reaching out to a new potential user who sees the ad calling them in to join the discussion with this existing user.

Examples of the text of the ads:

"Do You Hate Trump? Read it before it's taken down. This is what they aren't telling you."

"Do You Hate Biden? Read it before it's taken down. This is what they aren't telling you."

"Do You Love Trump? Did you know this? Unbelievable. Nobody is reporting this yet."

"Do You Love Biden? Did you know this? Unbelievable. Nobody is reporting this yet."

"Here is Why I Hate Trump. Read it before it's taken down. This is what they aren't telling you."

"Here is Why I Hate Biden. Read it before it's taken down. This is what they aren't telling you."

"Here is Why I Love Trump. Read it before it's taken down. This is what they aren't telling you."

"Here is Why I Love Biden. Read it before it's taken down. This is what they aren't telling you."

As mentioned above, the implicit persona of these ads is as if one of our existing users is reaching out to a prospective new user to engage them in a political conversation.

There are many different variations, and ads can reference Trump, Sanders, Biden, Warren, and other candidates, or sitting elected officials, or Democrat or Republican or any other party, or some current event or an issue. But regardless of the text of the ad all such ads lead to the same website (forum) with the same content. So it's never about giving preferential treatment to one candidate/party/issue over another.

The purpose of the ads is strictly to promote the participation on our forum by anybody who wants to join and become a user regardless of political affiliation.

Our ads never contain anything about voting. Never contain a call to action to vote or not to vote for any candidate or party. Ads contain a teaser like "read it before it's taken down" or "this is what they aren't telling you" or "nobody is reporting this yet", but on our website (forum) we never advocate for or against any candidate, party or issue. We only serve as a communications platform and retransmit

posts submitted by our users. And any person can register and post their own opinion, whatever that might be.

Generally, the idea of such ads is to trigger curiosity in a user enough for them to want to click on the ad to see "what it's all about". After that, read the content on our forum that was posted by other users. And then, join in to post their own replies. The intent is never to influence the outcome of elections but only to promote discussion and reflect on current events and news.

## Questions

Given the description of our business and ads please provide Advisory Opinion on the following:

- Are we required to register with the FEC in any capacity?
- Are we required to file reports on our ad spending with the FEC in connection with this forum?
- Is this considered by the FEC to be election or campaign advertising, expenditure or contribution?
- Is this considered by the FEC to be electioneer communications?
- Are we allowed to run such ads during primaries and elections or is there some kind of time period during which we must stop running ads promoting our forum?
- Do we qualify for the media or press or news exemption to the Federal Election Campaign Act's disclosure, disclaimer and reporting requirements given the fact that our forum's main function is to allow people to discuss news and events without any political influence from us?
- Are we required to add "paid for by IDF..." to our forum advertising in the same way as done by political committees running election advertising?

Thank you.

If necessary, IDF grants the Commission an extension on this Advisory Opinion request for 30 days following the date that the Commission holds its first open meeting at which a quorum of at least four Commissioners is present.

Sincerely,

Konstantin Goudkov  
IDF International Technologies, Inc.  
786-220-4656  
[info@idftech.com](mailto:info@idftech.com)

## Joanna Waldstreicher

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**From:** One Political Plaza <info@onepoliticalplaza.com>  
**Sent:** Friday, December 06, 2019 7:54 PM  
**To:** Joanna Waldstreicher  
**Subject:** Re: Advisory Opinion request

Hi Ms. Waldstreicher,

Yes. I confirm the accuracy of those statements.

Thanks.

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Konstantin Goudkov  
One Political Plaza,  
info@OnePoliticalPlaza.com  
<http://www.OnePoliticalPlaza.com>

> Dear Mr. Goudkov:

>

> Thank you for speaking with me yesterday to clarify some of the  
> information in the advisory opinion request you submitted on behalf of  
> IDF International Technologies, Inc. ("IDF"). As we discussed, below  
> is my understanding of certain relevant information that you provided  
> during that call. Please either confirm the accuracy of these  
> statements or correct them. We would appreciate your response by  
> email. Please note that your response may be considered part of IDF 's  
> advisory opinion request; if so, it will be posted as such on the Commission's website.

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> 1. IDF's only source of revenue is selling advertising space on  
> OnePoliticalPlaza.com and its other online forums. IDF does not  
> control the content of the ads that are displayed on its forums; IDF  
> sells its ad space through Google and other distributors of online advertising.

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> 2. IDF spends money only on operating expenses like server space and  
> webhosting, and buying ads to attract users. It does not make any  
> contributions to candidates, political parties, or other political  
> committees.

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> 3. IDF's only activities are hosting online forums. Its other forums  
> cover topics like fishing, photography, and other hobbies; none of the  
> other forums focus on political topics.

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> 4. IDF does not have any communication or interaction with any  
> candidates or political committees.

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- > 5. IDF does not solicit any contributions to candidates, political parties, or other political committees. It is possible that ads purchased by others to be displayed on OnePoliticalPlaza.com could solicit contributions, but IDF does not control the content of those ads.
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- > 6. None of IDF's ads include any references to voting or elections. They include the names of candidate and political parties, and may refer to political issues, but never use the words "election" or "vote" or refer to dates of elections.
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- > 7. IDF determines which candidates' and parties' names to use in its ads by means of tracking click-through rates and A/B testing, and those names that generate the most traffic are used. IDF does not use any other process to choose which candidates' or parties' names to use in its ads.
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