

OFFICE OF
GENERAL COUNSEL
BEFORE THE
FEDERAL ELECTION COMMISSION
2022 OCT 27 PM 12:12

Amanda Bogden
End Citizens United
PO Box 66005
Washington, DC 20035

MUR # 8083

Complainant,

v.

Thomas Patti
P.O. Box 730
Hilmar, CA 95324, and

Tom Patti for Congress and Kelly Lawler, Treasurer
P.O. Box 730
Hilmar, CA 95324
kellylawler@thekalgroup.com

Respondents.

COMPLAINT

This complaint is filed under 11 C.F.R. § 110.3(d) against Thomas Patti; Tom Patti for Congress, and Kelly Lawler, its Treasurer (collectively, “Respondents”), for violating the Federal Election Campaign Act of 1971, as amended (the “Act”) and Federal Election Commission (the “FEC” or “Commission”) regulations. There is compelling evidence that Respondents have violated FEC regulations by improperly using assets from Mr. Patti’s nonfederal campaign committee to support Mr. Patti’s federal campaign, in violation of the Act and Commission regulations. We urge the Commission to immediately investigate these violations and levy appropriate sanctions against Respondents for their failure to comply with basic requirements of the Act and Commission regulations.

FACTUAL BACKGROUND

Thomas Patti is a member of the San Joaquin County Board of Supervisors and a candidate for election to the U.S. House of Representatives from California's 9th Congressional District.¹ Patti formed his county candidate committee, Tom Patti for County Supervisor 2016 (later Tom Patti for County Supervisor 2020), for his 2016 supervisorial campaign for San Joaquin County's 3rd Supervisorial District, on February 4, 2014, and won election to the San Joaquin Board of Supervisors in 2016 and 2020.² On November 16, 2021, Patti publicly announced his congressional campaign³ and registered his principal campaign committee for his congressional campaign, Tom Patti for Congress, with the Commission.⁴ Patti filed his Statement of Candidacy with the Commission on November 20, 2021.⁵

This complaint pertains to several distinct actions taken by Respondents. The first is the involvement of Patti's county campaign committee, Tom Patti for County Supervisor 2020 ("nonfederal committee") in an advertisement campaign undertaken by Patti's principal congressional campaign committee ("federal committee"). On November 22 and 23, 2021, Patti's nonfederal committee ran a Facebook and Instagram video advertisement depicting Patti's congressional campaign announcement video.⁶ The announcement video featured Patti's declaration of his aspirations for Congress, contained a "Paid for by Tom Patti for Congress"

¹ Tom Patti for Congress, Statement of Candidacy (Nov. 16, 2021), available at <https://docquery.fec.gov/cgi-bin/forms/C00792168/1548375/>.

² See Exhibit A; Tom Patti for County Supervisor 2016, Recipient Committee Statement of Organization Form.

³ Twitter (Nov. 16, 2021), available at <https://twitter.com/SupeTomPatti/status/1460703788851859457>.

⁴ Tom Patti for Congress, Statement of Candidacy (Nov. 16, 2021), available at <https://docquery.fec.gov/cgi-bin/forms/C00792168/1548375/>.

⁵ *Id.*

⁶ See Exhibit B; Meta (November 22, 2021), available at https://www.facebook.com/ads/library/?active_status=all&ad_type=political_and_issue_ads&country=US&id=1491822131210857&view_all_page_id=723694947709649&search_type=page&media_type=all.

disclaimer on the video itself, and linked to Patti's congressional campaign website (TomPattiForCongress.com).⁷ The advertisement itself, however, was promoted through Patti's supervisorial Facebook account, paid for by Patti's nonfederal committee, and listed Patti's nonfederal committee identification number (1363871) under its advertisement information.⁸ The advertisement had an estimated audience of 1,000 to 5,0000 people, made approximately 1,000 impressions⁹, and cost over \$100.¹⁰ On April 22 and 23, 2022, Patti's nonfederal committee ran a second Facebook and Instagram pictorial advertisement encouraging viewers to attend one of Patti's congressional campaign events.¹¹ The advertisement was again promoted through Patti's supervisorial Facebook account, paid for by Patti's nonfederal committee, and provided Patti's nonfederal committee identification number.¹² This advertisement reached a larger audience of 10,000 to 50,000 people, cost an estimated \$400 to \$499, and made approximately 20,000 to 25,000 impressions.¹³

Second, Patti's nonfederal committee has openly paid for Patti's federal committee expenses on three separate occasions. Specifically, San Joaquin campaign finance filings identify that from July 1 to December 31, 2021, Patti's nonfederal committee paid \$765.03 to Creative Vision Printing, \$934.80 to Marriot, and \$700 to Mastro's.¹⁴ Each payment was to "[r]eimburse [] Tom Patti for Congress" and amounted to a total of \$2,399.83.¹⁵ On December 31, 2021, Patti's federal committee proceeded to pay his nonfederal committee a total of \$2,422.84 for

⁷ *Id.*

⁸ *Id.*

⁹ *Id.* (defining impressions as "the number of times an ad was on a screen")

¹⁰ *Id.*

¹¹ See Exhibit C; Meta (April 22, 2022), available at

https://www.facebook.com/ads/library/?active_status=all&ad_type=political_and_issue_ads&country=US&id=1916966295156917&view_all_page_id=723694947709649&search_type=page&media_type=all

¹² *Id.*

¹³ *Id.*

¹⁴ See Exhibit D; Tom Patti for County Supervisor 2020, FPPC 460 2/02/2022.

¹⁵ *Id.*

“Reimbursement For Travel, Printing, and Website.”¹⁶ Furthermore, San Joaquin campaign finance filings also illustrate that from January 1 to June 30, 2022, Patti’s nonfederal committee received a \$500 contribution from an individual for “Disc Jockey Services for Campaign Event.”¹⁷

The third violation arises from payments made by Patti’s nonfederal committee to three companies, The Kal Group (Kal), Rosales Johnson Agency (Rosales), and Gateway Media (Gateway). From July 1 to December 31, 2021 - the same time frame that Patti announced his congressional candidacy - Patti’s nonfederal committee made first time payments to Kal and Rosales.¹⁸ The nonfederal committee made similar payments to Gateway, albeit during a longer time frame of January 1 to December 31, 2021. Specifically, Patti’s nonfederal committee paid \$3,971.25 to Kal for accounting services, \$4,000 to Rosales for information technology costs, and \$39,886.66 to Gateway for information technology costs.¹⁹ The exact dates of these payments are uncertain, as campaign finance filings only establish that the payments occurred from July 1 (January 1 in the case of Gateway) to December 31, 2021.²⁰ Patti’s nonfederal committee had never paid any of these companies prior 2021.²¹

Notably, Patti’s federal committee began paying these companies for similar services during the same time frame. Patti’s federal committee paid Kal \$8,306.04 for bookkeeping on

¹⁶ Federal Election Commission, Disbursements, at https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00792168&recipient_name=patti&two_year_transaction_period=2022

¹⁷ See Exhibit E; Tom Patti for County Supervisor 2020, FPPC 460 8/01/2022.

¹⁸ See Exhibit D; Tom Patti for County Supervisor 2020, FPPC 460 2/02/2022.

¹⁹ *Id.*

²⁰ *Id.*

²¹ Tom Patti County Supervisor 2020, All Years, at <https://public.netfile.com/Pub2/AllFilingsByFiler.aspx?id=150313833>.

many occasions from August 26, 2021, to June 4, 2022,²² \$26,899.18 to Rosales for strategic consulting, fundraising consulting, and mileage from December 22, 2021 to June 15, 2022,²³ and \$139,707.70 to Gateway for digital advertising, emails, website services, TV ads, and mailers from December 31, 2021 to June 23, 2022.²⁴

Under California law, candidates for county office can accept contributions in excess of \$2,900²⁵ and contributions from federally prohibited sources, including corporations.²⁶ And, in fact, Patti's nonfederal committee filings indicate that he has received contributions in excess of the federal limits and from corporations.²⁷

LEGAL ANALYSIS

The Act and Commission regulations prohibit federal candidates from soliciting, receiving, directing, transferring or spending funds in connection with a federal election unless the funds are in amounts and from sources permitted by the Act, and are reported under the Act.²⁸ Specifically, to ensure that federal campaigns are funded with federally permissible funds, a federal candidate is prohibited from transferring funds or assets from the candidate's

²² Federal Election Commission, Disbursements, at https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00792168&recipient_name=the+kal+group

²³ Federal Election Commission, Disbursements, at https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00792168&recipient_name=rosales+johnson+agency

²⁴ Federal Election Commission, Disbursements, at https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00792168&recipient_name=gateway+media

²⁵ Cal. Code Regs. tit. 2, § 18545(a)(9) (setting limit for city and county offices at \$4,900 per election).

²⁶ Cal. Gov't Code § 82047 (defining "person" as including a corporation); *id.* § 85301 (establishing the contribution limits from "persons").

²⁷ See Exhibit D; Tom Patti for County Supervisor 2020, FPPC 460 2/02/2022 (accepting contribution of \$5,000 from Vanco Truck Stop, Inc.).

²⁸ 52 U.S.C. § 30125(e)(1); 11 C.F.R. § 300.61.

nonfederal campaign committee to their federal campaign committee.²⁹ The facts establish that Respondents engaged in three separate and distinct violations of 11 C.F.R. § 110.3(d) and 52 U.S.C. § 30125(e)(1).

I. Respondent's use of their nonfederal committee to pay for advertisements promoting Patti's congressional campaign constitutes an unlawful transfer of nonfederal committee funds to a federal committee in violation of 11 C.F.R. § 110.3(d) and 52 U.S.C. § 30125(e)(1).

Patti's nonfederal committee undisputedly used their funds to support Patti's congressional campaign, in clear violation of 11 C.F.R. § 110.3(d). First, Patti's nonfederal committee provided the funds and platform for the congressional advertisements. This blatantly occurred on two occasions, first on November 22 and 23, 2021, and again on April 22 and 23, 2022. Both advertisements were posted on Patti's supervisorial Facebook account, stated they were paid for by "Tom Patti for Supervisor," and specifically listed Patti's nonfederal committee's identification number (1363871) when providing their advertisement information.³⁰ Not only did Patti's nonfederal committee promote the advertisement on Patti's supervisorial Facebook account, but both ads were directly paid for by Patti's nonfederal committee, with the first costing approximately \$100, and the second costing an estimated \$400 to \$499.³¹

These advertisements resulted in a transfer of funds to Patti's principal federal committee in violation of 11 C.F.R. § 110.3(d), as both advertisements used nonfederal committee funds to promote messages and events associated with Patti's congressional election. Both advertisements

²⁹ 11 C.F.R. § 110.3(d).

³⁰ See Exhibit B and C.

³¹ *Id.*

linked to Patti's congressional campaign website (tompattiforcongress.com), and centrally and visibly emphasized Patti's congressional campaign.³² The November 22-23, 2021, video advertisement depicted a large central slogan of "Tom Patti for Congress 2022" while Patti's voiceover stated "I'm Tom Patti. I want to be your voice in Congress, and I approve this message."³³ The April 22-23, 2022 advertisement also contained a large slogan of "Tom Patti U.S. Congress," as well as a written statement of "Chat with Tom about his campaign for Congress and issues impacting our country" and the email associated with Patti's congressional campaign.³⁴ By using nonfederal committee funds to pay for congressional advertisements, Patti's nonfederal committee relieved Patti's federal committee of the fiscal burden of running these ads themselves, in violation of 11 C.F.R. § 110.3(d).³⁵ As the nonfederal committee has accepted funds in excess of the federal limits and from corporations, this violation also constitutes the use of excessive and federally impermissible funds in support of federal election activity in violation of the Act.³⁶

II. Respondent's use of Patti's nonfederal committee to pay for federal committee printing, travel, and website expenses constitutes a second unlawful transfer of nonfederal campaign committee funds to a federal committee in violation of 11 C.F.R. § 110.3(d) and 52 U.S.C. § 30125(e)(1).

Respondent's use of Patti's nonfederal committee to pay for printing, travel, and website expenses for Patti's congressional election violated 11 C.F.R. § 110.3(d) a second time. From July 1 to December 31, 2021 (San Joaquin campaign finance filings do not provide the exact

³² *Id.*

³³ See Exhibit B.

³⁴ See Exhibit C.

³⁵ 11 C.F.R. § 110.3(d).

³⁶ 52 U.S.C. § 30125(e)(1).

dates) Patti's nonfederal committee paid \$765.03 to Creative Vision Printing, \$934.80 to Marriot, and \$700 to Mastro's (for a total of \$2,399.83).³⁷ Each payment stated it was to "Reimburse from Tom Patti for Congress" clearly indicating that Patti's congressional printing and travel expenses were initially paid for by the nonfederal committee.³⁸ On December 31, 2021, Patti's federal committee attempted to remedy these violations by paying his nonfederal committee a total of \$2,422.84 on December 31, 2021, for "Reimbursement For Travel, Printing, and Website."³⁹ However, a "contribution" is defined as including any "advance" of funds made for the purpose of influencing a federal election.⁴⁰ By using nonfederal committee funds to pay for congressional campaign expenses, Patti's nonfederal committee again relieved (albeit temporarily) Patti's federal committee of the fiscal burden of significant congressional campaign expenses. Thus, this constituted another impermissible transfer of funds to Patti's federal committee in violation of 11 C.F.R. § 110.3(d). and 52 U.S.C. § 30125(e)(1).

Furthermore, Patti's nonfederal committee also received a contribution that appeared to be designated for federal congressional campaign purposes. Specifically, from January 1 to June 30, 2022, Patti's nonfederal committee received a \$500 contribution from an individual for "Disc Jockey Services for Campaign Event."⁴¹ Patti was actively campaigning for his congressional campaign during this time and did not face supervisorial reelection for another several years, indicating this contribution was meant to support a Patti federal committee event utilizing disc jockey services. Thus, not only did Patti's nonfederal committee use nonfederal committee funds for congressional campaign expenses, but possibly directly solicited funds for that purpose.

³⁷ See Exhibit D; Tom Patti for County Supervisor 2020, FPPC 460 2/02/2022.

³⁸ *Id.*

³⁹ Federal Election Commission, Disbursements, at https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00792168&recipient_name=patti&two_year_transaction_period=2022

⁴⁰ 11 C.F.R. § 100.52(a).

⁴¹ See Exhibit E; Tom Patti for County Supervisor 2020, FPPC 460 8/01/2022.

Thus, this constitutes yet another impermissible transfer of funds to Patti's federal committee in violation of 11 C.F.R. § 110.3(d) and 52 U.S.C. § 30125(e)(1).

III. Respondent's nonfederal committee payments to Kal, Rosales, and Gateway constituted a third impermissible transfer of nonfederal campaign committee funds to a federal committee in violation of 11 C.F.R. § 110.3(d) and 52 U.S.C. § 30125(e)(1)

Not only did Respondents explicitly violate 11 C.F.R. § 110.3(d) on two occasions as analyzed above, but there is significant evidence to suggest Patti's nonfederal committee payments to Kal, Rosales, and Gateway violated 11 C.F.R. Section 110.3(d) in a third set of transactions.

First, the lack of a prior existing relationship between Patti's nonfederal committee in conjunction with Patti's announcement of his congressional candidacy on November 16, 2021, creates a reasonable inference that these payments were for services for Patti's congressional campaign. Patti's nonfederal committee had never paid any of these companies prior to 2021 and had not paid Kal or Rosales prior to the period of July 1 to December 31, 2021,⁴² the same exact time frame that Patti announced his congressional campaign and registered his federal committee with the Commission.

Second, not only were the payments from Patti's nonfederal committee correlated with Patti announcing his congressional campaign, but with the contemporaneous use of Kal, Rosales, and Gateway by Patti's *federal* committee. Specifically, Patti's congressional committee began paying Kal and Rosales for services associated with his federal campaign *during the exact same*

⁴² See Exhibit D; Tom Patti for County Supervisor 2020, FPPC 460 2/02/2022.

period that payments were reported by Patti’s state committee. Specifically, Patti’s congressional committee paid Kal for bookkeeping on August 26, October 4, November 11, and December 15 of 2021⁴³ and paid Rosales for strategic consulting, fundraising consulting, and mileage on December 22, 2021⁴⁴. Furthermore, these three companies went on to play a significant and ongoing role in Patti’s congressional campaign, further indicating that the initial payments by Patti’s nonfederal committee were simply a guise for supporting Patti’s federal campaign. Patti’s congressional committee went on to pay Kal a total of \$8,306.04 from August 26, 2021 to June 4, 2022,⁴⁵ \$26,899.18 to Rosales from December 22, 2021 to June 15, 2022,⁴⁶ and \$139,707.70 to Gateway Media from December 31, 2021 to June 23, 2022.⁴⁷

Third, the timeline of Patti’s supervisorial election cycle suggests that significant county campaign expenditures during this time was highly out of the ordinary. Patti won his Board of Supervisor reelection campaign outright in a March 2020 primary and was not up for re-election until 2024.⁴⁸ Given that Patti did not face supervisorial reelection for another several years and had just announced his congressional campaign, it is odd that he would retain new vendors and pay them large sums (including \$39,886.66 for “information technology”) three years before his next nonfederal election. In summary, Patti’s first-time state committee payments to Kal,

⁴³ Federal Election Commission, Disbursements, at https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00792168&recipient_name=the+kal+group

⁴⁴ Federal Election Commission, Disbursements, at https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00792168&recipient_name=rosales+johnson+agency

⁴⁵ Federal Election Commission, Disbursements, at https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00792168&recipient_name=the+kal+group

⁴⁶ Federal Election Commission, Disbursements, at https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00792168&recipient_name=rosales+johnson+agency

⁴⁷ Federal Election Commission, Disbursements, at https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00792168&recipient_name=gateway+media

⁴⁸ Ballotpedia, Tom Patti, at https://ballotpedia.org/Tom_Patti.

Rosales, and Gateway, considered alongside his absence of county election, congressional candidacy announcement, and overlapping federal committee payments to these same companies, creates a powerful inference that Patti's nonfederal committee payments to these companies were in connection with his federal campaign.

In summary, not only did Respondents engage in explicit violations of 52 U.S.C. § 30125(e) by using Patti's county committee to pay for advertisements and expenses associated with Patti's congressional campaign, but Patti's nonfederal committee payments to Kal, Rosales, and Gateway were highly out of the ordinary and must be investigated to determine if such state committee payments were used to support Patti's congressional campaign.

REQUESTED ACTION

As shown, Respondents appear to have repeatedly violated the Act and Commission regulations by using his nonfederal committee to pay for advertisements, travel, printing, and possibly bookkeeping and information technology expenses for his federal congressional campaign. Accordingly, we respectfully request that the Commission immediately investigate these violations, fine Respondents the maximum amount permitted by law, and enjoin Respondents from further violations of the law.

Sincerely,



Amanda Bogden
End Citizens United
PO Box 66005
Washington, DC 20035

SUBSCRIBED AND SWORN to before me this 25th day of September 2022.



Notary Public

My Commission Expires:

MARK ANDREWS
NOTARY PUBLIC DISTRICT OF COLUMBIA
My Commission Expires July 14, 2024

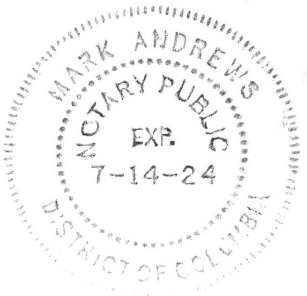


EXHIBIT A

1363871

Statement of Organization Recipient Committee

Statement Type Initial Amendment Termination - See Part 5

Not yet qualified or

List I.D. number: # _____ # _____

Date qualified as committee _____ Date qualified as committee (if applicable) _____ Date of Termination _____

Date Stamp
RECEIVED AND FILED
 in the office of the Secretary of State
 of the State of California
FEB 14 2014
 Hand Delivered, Sacramento

CALIFORNIA FORM 410
 For Official Use Only
 14 MAR 11 PM 1:50
 REGISTRAR OF VOTERS
 COUNTY

39

1. Committee Information

NAME OF COMMITTEE: TOM PATTI FOR COUNTY SUPERVISOR 2016

STREET ADDRESS (NO P.O. BOX): _____

CITY: _____ STATE: _____ ZIP CODE: _____ AREA CODE/PHONE: _____

MAILING ADDRESS (IF DIFFERENT): _____

FAX (IF APPLICABLE): _____

COUNTY OF DOMICILE: SAN JOAQUIN JURISDICTION WHERE COMMITTEE IS ACTIVE: SAN JOAQUIN, CALIF.

2. Treasurer and Other Principal Officers

NAME OF TREASURER: KIMM LOVELACE

STREET ADDRESS (NO P.O. BOX): _____

CITY: _____ STATE: _____ ZIP CODE: _____ AREA CODE/PHONE: _____

NAME OF ASSISTANT TREASURER, IF ANY: _____

STREET ADDRESS (NO P.O. BOX): _____

CITY: _____ STATE: _____ ZIP CODE: _____ AREA CODE/PHONE: _____

NAME OF PRINCIPAL OFFICER(S): TOM PATTI

STREET ADDRESS (NO P.O. BOX): _____

CITY: _____

Attach additional information on appropriately labeled continuation sheets.

3. Verification

I have used all reasonable diligence in preparing this statement and to the best of my knowledge the information contained herein is true and complete. I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on 2-6-14 By _____

Executed on 2-6-14 By _____

Executed on _____ By _____


Executed on _____ By _____


SIGNATURE OF CONTROLLING OFFICERHOLDER, CANDIDATE, OR STATE MEASURE PROPONENT

FPPC Form 410 (Dec/2012)
 FPPC Advice: advice@fppc.ca.gov (866/275-3772)
 www.fppc.ca.gov

EXHIBIT B

About the ad


 We took down this ad after it started running because the disclaimer doesn't follow our [Advertising Policies](#)




Tom Patti County Supervisor
Sponsored • Paid for by Tom Patti for Supervisor 2020
ID: 1491822131210857




We need to step away from the 'cancel culture' perpetuated by those in leadership right now and towards less divisive, common-sense solutions that put our community first.

So today, I am announcing that I am running for Congress - be one of the first to watch my announcement video.

 Ad removed




Data behind the ad

 Inactive  

Nov 22, 2021 - Nov 23, 2021
ID: 1491822131210857

Estimated Audience Size


Estimated Audience Size generally estimates how many **people** meet the targeting and ad placement criteria that advertisers select while creating an ad. [See more](#)

 Estimated Audience Size

1K - 5K people

Amount spent


The estimated total amount of money spent on an ad during its schedule. [Learn more](#)

 Amount spent

<\$100 (USD)

Impressions

The number of times an ad was on a screen. May include multiple views by the same people. [Learn more](#)

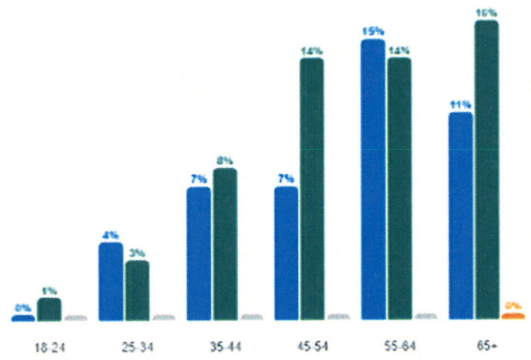
 Impressions

<1K

Who was shown this ad

The age and gender breakdowns of people who saw this ad


Men **Women** **Unknown**



| Age Group | Men (%) | Women (%) | Unknown (%) |
|-----------|---------|-----------|-------------|
| 18-24 | 0% | 1% | 0% |
| 25-34 | 4% | 3% | 0% |
| 35-44 | 7% | 8% | 0% |
| 45-54 | 7% | 14% | 0% |
| 55-64 | 15% | 14% | 0% |
| 65+ | 11% | 16% | 0% |

Where this ad was shown

The regions where people who saw this ad are located.








| Region | Percentage |
|------------|------------|
| California | 88% |
| Georgia | 1% |
| Oregon | 1% |

About the disclaimer

When an advertiser categorizes their ad as being about social issues, elections or politics, they are required to disclose who paid for the ad. [Learn more](#)

Information from the advertiser

This information was submitted by the advertiser.
Submitted Jul 4, 2021

-  **Disclaimer**
Tom Patti for Supervisor 2020
-  **Phone number**
+19169960217
-  **Email**
tab@votetompatti.com
-  **Website**
<http://votetompatti.com/>
-  **Address**
2229 Stewart Street, #A, Stockton, California 95205, US

Additional information • Not confirmed




-  **Director**
Tab Berg
-  **Point of contact**
Tab Berg
-  **Committee ID**
1363871

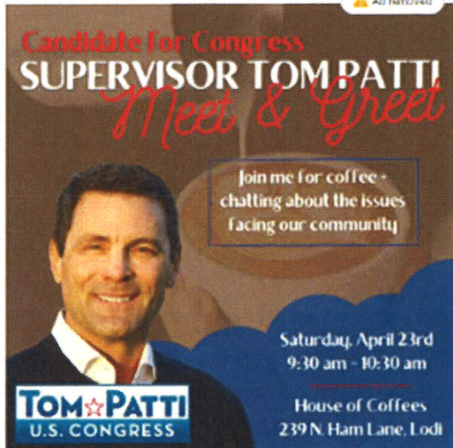
EXHIBIT C

About the ad

We took down this ad after it started running because the disclaimer doesn't follow our Advertising Policies

Tom Patti County Supervisor
Sponsored - Paid for by Tom Patti For Supervisor 2020
ID: 1916996295159217

Join San Joaquin County Supervisor this Saturday at House of Coffees. Chat with Tom about his campaign for Congress and issues impacting our county. For more information email Tom@TomPattiForCongress.com



About the disclaimer

When an advertiser categorizes their ads as being about social issues, elections or politics, they are required to disclose who paid for the ad. [Learn more](#)

Information from the advertiser

This information was submitted by the advertiser.
Submitted July 4, 2021

- Disclaimer**
Tom Patti for Supervisor 2020
- Phone number**
+19169962917
- Email**
tab@votetompatti.com
- Website**
http://votetompatti.com/
- Address**
2229 Stewart Street, #A, Stockton, California 95208, US

Additional Information - Not confirmed

- Director**
Tab Berg
- Point of contact**
Tab Berg
- Committee ID**
1263871

Data behind the ad

Inactive
Apr 23, 2022 - Apr 23, 2022
ID: 1916996295159217

Estimated Audience Size
Estimated Audience Size generally estimates how many people meet the targeting and ad placement criteria that advertisers select while creating an ad. [See more](#)

Estimated Audience Size
10K - 50K people

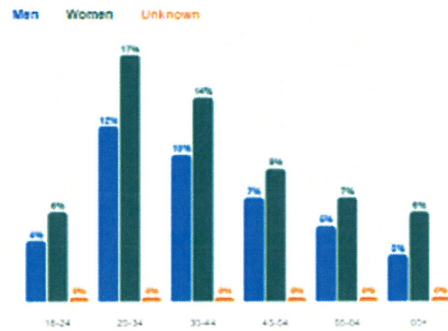
Amount spent
The estimated total amount of money spent on an ad during its schedule. [Learn more](#)

Amount spent
\$400 - \$499 (USD)

Impressions
The number of times an ad was on a screen. May include multiple views by the same people. [Learn more](#)

Impressions
20K - 25K

Who was shown this ad
The age and gender breakdowns of people who saw this ad.



Where this ad was shown
The regions where people who saw this ad are located.

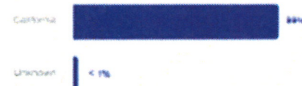


EXHIBIT D

11 of 23

Schedule E
Payments Made

Amounts may be rounded to whole dollars.

Statement covers period
from 07/01/2021
through 12/31/2021

SCHEDULE E
CALIFORNIA FORM 460
Page 11 of 23
I.D. NUMBER 1363871

SEE INSTRUCTIONS ON REVERSE

NAME OF FILER

Tom Patti County Supervisor 2020

CODES: If one of the following codes accurately describes the payment, you may enter the code. Otherwise, describe the payment.

- CMP campaign paraphernalia/misc.
- CNS campaign consultants
- CTB contribution (explain nonmonetary)*
- CVC civic division
- FL candidate filing/balot fees
- FND fundraising events
- IND independent expenditure supporting/opposing others (explain)*
- LEG legal defense
- LIT campaign literature and mailings
- MBR member communications
- MTG meetings and appearances
- OFC office expenses
- PET petition circulating
- PHO phone banks
- POL polling and survey research
- POS postage, delivery and messenger services
- PRO professional services (legal, accounting)
- PRT print ads
- RAD radio airtime and production costs
- RFD returned contributions
- SAL campaign workers' salaries
- TCL tv, or cable airtime and production costs
- TRC candidate travel, lodging, and meals
- TRM staff/expense travel, lodging, and meals
- TSP transfer between committees of the same candidate/sponsor
- VOT voter registration
- WEB information technology costs (internet, e-mail)

| NAME AND ADDRESS OF PAYEE (IF COMMITTEE, ALSO ENTER I.D. NUMBER) | CODE OR | DESCRIPTION OF PAYMENT | AMOUNT PAID |
|--|---------|------------------------|------------------|
| Capital One McLean, VA 22102 | WEB | | 6,573.96 |
| Capital One McLean, VA 22102 | WEB | | 9,216.61 |
| The KAL Group, Inc. Hilmar, CA 95324 | PHO | | 3,971.25 |
| SUBTOTAL \$ | | | 19,763.42 |

* Payments that are contributions or independent expenditures must also be summarized on Schedule D.

Powered by ES&P Political.com

FFPC Form 460 (Jan/2015)
FFPC Advice: advice@ffpc.ca.gov (916) 73-3773
www.ffpc.ca.gov

1/27/2022, 2:35

19 of 23

Schedule G
Payments Made by an Agent or Independent Contractor (on Behalf of This Committee)

Amounts may be rounded to whole dollars.

Statement covers period
from 07/01/2021
through 12/31/2021

SCHEDULE E.G
CALIFORNIA FORM 460
Page 18 of 23
I.D. NUMBER 1363871

SEE INSTRUCTIONS ON REVERSE

NAME OF FILER

Tom Patti County Supervisor 2020

NAME OF AGENT OR INDEPENDENT CONTRACTOR

Capital One

CODES: If one of the following codes accurately describes the payment, you may enter the code. Otherwise, describe the payment.

- CMP campaign paraphernalia/misc.
- CNS campaign consultants
- CTB contribution (explain nonmonetary)*
- CVC civic division
- FL candidate filing/balot fees
- FND fundraising events
- IND independent expenditure supporting/opposing others (explain)*
- LEG legal defense
- LIT campaign literature and mailings
- MBR member communications
- MTG meetings and appearances
- OFC office expenses
- PET petition circulating
- PHO phone banks
- POL polling and survey research
- POS postage, delivery and messenger services
- PRO professional services (legal, accounting)
- PRT print ads
- RAD radio airtime and production costs
- RFD returned contributions
- SAL campaign workers' salaries
- TCL tv, or cable airtime and production costs
- TRC candidate travel, lodging, and meals
- TRM staff/expense travel, lodging, and meals
- TSP transfer between committees of the same candidate/sponsor
- VOT voter registration
- WEB information technology costs (internet, e-mail)

| NAME AND ADDRESS OF PAYEE (IF COMMITTEE, ALSO ENTER I.D. NUMBER) | CODE OR | DESCRIPTION OF PAYMENT | AMOUNT PAID |
|--|---------|---------------------------------------|-----------------|
| Miridon Los Angeles, CA 90043 | | Reimburse from Tom Patti for Congress | 534.80 |
| Meador's Beverly Hills, CA 90210 | | Reimburse from Tom Patti for Congress | 700.00 |
| Reveler Johnson Agency Sacramento, CA 95814 | WFR | | 4,075.00 |
| Smart & Pinal Stockton, CA 95206 | OFC | | 150.26 |
| TOTAL \$ | | | 5,790.06 |

* Payments that are contributions or independent expenditures must also be summarized on Schedule D.

** Do not transfer to any other schedule on this Form. Money Paid. This total may not equal the amount paid to the agent or independent contractor as reported on Schedule F.

Powered by ES&P Political.com

FFPC Form 460 (Jan/2015)
FFPC Advice: advice@ffpc.ca.gov (916) 73-3773
www.ffpc.ca.gov

1/27/2022, 2:35 PM

2823

Schedule G
Payments Made by an Agent or Independent Contractor (on Behalf of This Committee)

Amounts may be rounded to whole dollars.

Statement covers period from 07/01/2021 through 12/31/2021 CALIFORNIA FORM 460 Page 17 of 23

SEE INSTRUCTIONS ON REVERSE
NAME OF FILER
Tom Patti County Supervisor 2020
NAME OF AGENT OR INDEPENDENT CONTRACTOR
Capital One

I.D. NUMBER
1363871

CODES: If one of the following codes accurately describes the payment, you may enter the code. Otherwise, describe the payment.

- CMP campaign paraphernalia/misc.
CNS campaign consultants
CTB contribution (explain non-monetary)*
CVC civic donations
FL candidate filing/ballot fees
FND fundraising events
IND independent expenditure supporting/opposing others (explain)**
LEG legal defense
LIT campaign literature and mailings
MBR member communications
MIG meetings and appearances
OFC office expenses
PET petition circulating
PHO phone banks
POL polling and survey research
POS postage, delivery and messenger services
PRO professional services (legal, accounting)
PRT print ads
RAD radio airtime and production costs
RFD returned contributions
SAL campaign workers' salaries
TEL tv, or cable airtime and production costs
TRC candidate travel, lodging, and meals
TRF staff/expense travel, lodging, and meals
TSF transfer between committees of the same candidate/sponsor
VOT voter registration
WEB information technology costs (internet, e-mail)

Table with 4 columns: NAME AND ADDRESS OF PAYEE, CODE OR, DESCRIPTION OF PAYMENT, AMOUNT PAID. Includes entries for Gateway Media in Sacramento, CA 95814 with amounts ranging from 1,274.47 to 4,170.00.

TOTAL * \$ 13,368.22

* Payments that are contributions or independent expenditures must also be summarized on Schedule D.

** Do not transfer to any other schedule or to the Summary Page. This total may not equal the amount paid to the agent or independent contractor as reported on Schedule E.

FPPC Form 460 (Jan/2016)
FPPC Advice: advice@fppc.ca.gov (866)275-3772
www.fppc.ca.gov

Powered by IPolitical.com

1/27/2022, 2:35 PM

16 of 23

Schedule G
Payments Made by an Agent or Independent Contractor (on Behalf of This Committee)

Amounts may be rounded to whole dollars.

Statement covers period from 07/01/2021 through 12/31/2021 CALIFORNIA FORM 460 Page 16 of 23

SEE INSTRUCTIONS ON REVERSE
NAME OF FILER
Tom Patti County Supervisor 2020
NAME OF AGENT OR INDEPENDENT CONTRACTOR
Capital One

I.D. NUMBER
1363871

CODES: If one of the following codes accurately describes the payment, you may enter the code. Otherwise, describe the payment.

- CMP campaign paraphernalia/misc.
CNS campaign consultants
CTB contribution (explain non-monetary)*
CVC civic donations
FL candidate filing/ballot fees
FND fundraising events
IND independent expenditure supporting/opposing others (explain)**
LEG legal defense
LIT campaign literature and mailings
MBR member communications
MIG meetings and appearances
OFC office expenses
PET petition circulating
PHO phone banks
POL polling and survey research
POS postage, delivery and messenger services
PRO professional services (legal, accounting)
PRT print ads
RAD radio airtime and production costs
RFD returned contributions
SAL campaign workers' salaries
TEL tv, or cable airtime and production costs
TRC candidate travel, lodging, and meals
TRF staff/expense travel, lodging, and meals
TSF transfer between committees of the same candidate/sponsor
VOT voter registration
WEB information technology costs (internet, e-mail)

Table with 4 columns: NAME AND ADDRESS OF PAYEE, CODE OR, DESCRIPTION OF PAYMENT, AMOUNT PAID. Includes entries for Gateway Media in Sacramento, CA 95814 with amounts ranging from 218.00 to 4,315.44.

TOTAL * \$ 13,039.72

* Payments that are contributions or independent expenditures must also be summarized on Schedule D.

** Do not transfer to any other schedule or to the Summary Page. This total may not equal the amount paid to the agent or independent contractor as reported on Schedule E.

FPPC Form 460 (Jan/2016)
FPPC Advice: advice@fppc.ca.gov (866)275-3772
www.fppc.ca.gov

Powered by IPolitical.com

1/27/2022, 2:35 PM

PATTTT_CA_460_2021_07_01_20211231-1.pdf

file:///C:/Users/DKlanu/AppData/Local/Temp/PATTTT_CA_460_2021...

Schedule G
Payments Made by an Agent or Independent Contractor (on Behalf of This Committee)

Amounts may be rounded to whole dollars.

| | |
|---------------------------|-----------------------------|
| Statement covers period | CALIFORNIA FORM 460 |
| from 01/01/2021 | Page 15 of 18 |
| through 06/30/2021 | I.D. NUMBER 1363871 |

SEE INSTRUCTIONS ON REVERSE

NAME OF FILER

Patti For Supervisor 2016

NAME OF AGENT OR INDEPENDENT CONTRACTOR

Capital One

CODES: If one of the following codes accurately describes the payment, you may enter the code. Otherwise, describe the payment.

- | | | |
|---|--|--|
| CMP* campaign paraphernalia/misc | MIR* member communications | RAD* radio airtime and production costs |
| CNS* campaign consultants | MTG* meetings and appearances | RFD* returned contributions |
| CTR* contribution (specify nonmonetary)** | OFF* office expenses | SAL* campaign workers' salaries |
| CVC* civic donations | PET* petition circulating | TEL* tv or cable airtime and production costs |
| FL* candidate filing/ballot fees | PHD* phone banks | TRC* candidate travel, lodging, and meals |
| FND* fundraising events | POL* polling and survey research | TRF* telephone travel, lodging, and meals |
| IND* independent expenditures supporting/opposing others (explain)* | POS* postage, delivery and messenger services | TSF* transfer between committees of the same candidate/sponsor |
| LEG* legal defense | PRO* professional services (legal, accounting) | VOT* voter registration |
| LIT* campaign literature and mailings | PRF* print ads | WEB* information technology costs (internet, e-mail) |

| NAME AND ADDRESS OF PAYEE (IF COMMITTEE, ALSO ENTER I.D. NUMBER) | CODE OR | DESCRIPTION OF PAYMENT | AMOUNT PAID |
|--|---------|------------------------|------------------|
| Capital One Stockton, CA 95206 | CMP | | 1,374.09 |
| Gateway Media Sacramento, CA 95814 | WEB | | 10,290.30 |
| Medina OSullivan Folsom, CA 95665 | CNS | | 1,000.00 |
| TAB Communications, Inc. Folsom, CA 95665 | CNS | | 1,000.00 |
| TOTAL * \$ | | | 13,664.39 |

* Payments that are contributions or independent expenditures must also be summarized on Schedule D.

** Do not transfer to any other schedule or to the Summary Page. This total may not equal the amount paid to the agent or independent contractor as reported on Schedule C.

PPPC Form 460 (Jan/2018)
 PPPC Advice: advice@pppc.ca.gov (866)275-3772
 www.pppc.ca.gov

Powered by IPollIt.com

Schedule E
Payments Made

Amounts may be rounded to whole dollars.

| | |
|---------------------------|-----------------------------|
| Statement covers period | CALIFORNIA FORM 460 |
| from 01/01/2021 | Page 11 of 18 |
| through 06/30/2021 | I.D. NUMBER 1363871 |

SEE INSTRUCTIONS ON REVERSE

NAME OF FILER

Patti For Supervisor 2016

CODES: If one of the following codes accurately describes the payment, you may enter the code. Otherwise, describe the payment.

- | | | |
|---|--|--|
| CMP* campaign paraphernalia/misc | MIR* member communications | RAD* radio airtime and production costs |
| CNS* campaign consultants | MTG* meetings and appearances | RFD* returned contributions |
| CTR* contribution (specify nonmonetary)** | OFF* office expenses | SAL* campaign workers' salaries |
| CVC* civic donations | PET* petition circulating | TEL* tv or cable airtime and production costs |
| FL* candidate filing/ballot fees | PHD* phone banks | TRC* candidate travel, lodging, and meals |
| FND* fundraising events | POL* polling and survey research | TRF* telephone travel, lodging, and meals |
| IND* independent expenditures supporting/opposing others (explain)* | POS* postage, delivery and messenger services | TSF* transfer between committees of the same candidate/sponsor |
| LEG* legal defense | PRO* professional services (legal, accounting) | VOT* voter registration |
| LIT* campaign literature and mailings | PRF* print ads | WEB* information technology costs (internet, e-mail) |

| NAME AND ADDRESS OF PAYEE (IF COMMITTEE, ALSO ENTER I.D. NUMBER) | CODE OR | DESCRIPTION OF PAYMENT | AMOUNT PAID |
|--|---------|------------------------|------------------|
| Capital One McLean, VA 22102 | CNS | | 1,000.00 |
| Capital One McLean, VA 22102 | WEB | | 10,200.30 |
| Gateway Media Sacramento, CA 95814 | WEB | | 3,188.42 |
| Medina OSullivan Stockton, CA 95205 | SAL | | 500.00 |
| SUBTOTAL \$ | | | 14,978.72 |

* Payments that are contributions or independent expenditures must also be summarized on Schedule D.

PPPC Form 460 (Jan/2018)
 PPPC Advice: advice@pppc.ca.gov (866)275-3772
 www.pppc.ca.gov

Powered by IPollIt.com

4 of 23

**Schedule A
Monetary Contributions Received**

Amounts may be rounded to whole dollars.

| | | | |
|-------------------------|------------|-----------------------------|--|
| Statement covers period | | SCHEDULE A | |
| from | 07/01/2021 | CALIFORNIA FORM 460 | |
| through | 12/31/2021 | Page 4 of 23 | |
| | | ID NUMBER 1363871 | |

SEE INSTRUCTIONS ON REVERSE SIDE OF FILE

Tom Patti County Supervisor 2020

| DATE RECEIVED | FULL NAME, STREET ADDRESS AND ZIP CODE OF CONTRIBUTOR (IF COMMITTEE, ALSO ENTER I.D. NUMBER) | CONTRIBUTION CODE | IF INDIVIDUAL, ENTER OCCUPATION AND EMPLOYER (IF SELF-EMPLOYED, ENTER NAME OF BUSINESS) | AMOUNT RECEIVED THIS PERIOD | CUMULATIVE TO DATE (JAN. 1 - DEC. 31) | PER ELECTION TO DATE (IF REQUIRED) |
|---------------|--|---|---|-----------------------------|---------------------------------------|------------------------------------|
| 05/19/2021 | Monte Singh Oil Tracy, CA 95377 | <input checked="" type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC | Businessman Mountain Mikes Pizza Robinhood | 500.00 | 500.00 | |
| 07/02/2021 | Republic Services, Inc. Phoenix, AZ 85054 | <input type="checkbox"/> IND <input checked="" type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC | | 1,000.00 | 1,000.00 | |
| 12/16/2021 | Vanco Truck Stop Inc. Stockton, CA 95206 | <input type="checkbox"/> IND <input checked="" type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC | | 4,500.00 | 5,000.00 | |
| 12/16/2021 | Vanco Truck Stop Inc. Stockton, CA 95206 | <input type="checkbox"/> IND <input checked="" type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC | | 100.00 | 5,000.00 | |
| | | <input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC | | | | |

SUBTOTAL \$ 6,500.00

FPPC Form 460 (Jan/2016)
FPPC Advice: advice@fppc.ca.gov (866)275-3772
www.fppc.ca.gov

Powered by RPollnet.com

1/27/2022, 2:35 PM

PATITE_CA_460_20210701-20211231-1.pdf

file:///C:/Users/DCKName/AppData/Local/Temp/PATITE_CA_460_202...

EXHIBIT E

5 of 8

**Schedule C
Nonmonetary Contributions Received**

Type or print in ink.
Amounts may be rounded
to whole dollars.

SCHEDULE C

| | |
|--|--------------------------------|
| Statement covers period From _____ through _____ | CALIFORNIA FORM 460 |
| | 5 / 8 |
| | I.D. Number 1363871 |

SEE INSTRUCTIONS ON REVERSE

NAME OF FILER

Tom Patti County Supervisor 2020

| DATE RECEIVED | FULL NAME, STREET ADDRESS AND ZIP CODE OF CONTRIBUTOR (IF CONTRIBUTOR ALSO ENTER ID NUMBER) | CONTRIBUTOR CODE * | IF AN INDIVIDUAL, ENTER OCCUPATION AND EMPLOYER (IF SELF-EMPLOYED, ENTER NAME OF BUSINESS) | DESCRIPTION OF GOODS OR SERVICES | AMOUNT/FAIR MARKET VALUE | CUMULATIVE TO DATE CALENDAR YEAR (JAN 1 - DEC 31) | PER ELECTION TO DATE (IF REQUIRED) |
|----------------------|---|---|--|---|--------------------------|---|------------------------------------|
| Rec'd On: 05/16/2022 | Karen Esgal Stockton CA 95219 | <input checked="" type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC | Administration Eagal Lakes Resort | Disc Jockey Services for Campaign Event | 500.00 | 500.00 | |

| | | |
|---|--------------------|--------|
| Attach additional information on appropriately labeled continuation sheets. | SUBTOTAL \$ | 500.00 |
|---|--------------------|--------|

Schedule C Summary

| | | |
|--|-----------------|--------|
| 1. Amount received this period - nonmonetary contributions of \$100 or more. (Include all Schedule C subtotals.) | \$ | 500.00 |
| 2. Amount received this period - unitemized nonmonetary contributions of less than \$100 | \$ | 0.00 |
| 3. Total nonmonetary contributions received this period. (Add Lines 1 and 2. Enter here and on the Summary Page, Column A, Lines 4 and 1D.) | TOTAL \$ | 500.00 |

| |
|---|
| *Contributor Codes IND - Individual COM - Recipient Committee (other than PTY or SCC) OTH - Other PTY - Political Party SCC - Small Contributor Committee |
|---|

FPPC Form 460 (JAN05)
FPPC Toll-Free Helpline: 866/ASK-FPPC

7/27/2022, 11:59 AM

PATTT_TCOS_460_2022.01.01-2022 - PATTT_TCOS_460_2022... File://C:/Users/Dan/Downloads/PATTT_TCOS_460_2022.06.30.pdf