

SEEC FORM 26—SHORT FORM
Independent Expenditure Statement for Persons

Revised August 2014



149013
 10/28/2014 4:42 PM

Original
 Amendment

Official Use Only

Page 1 of 8

1. NAME OF PERSON MAKING INDEPENDENT EXPENDITURE

Independence USA PAC

2. NAME OF INDIVIDUAL FILING INDEPENDENT EXPENDITURE STATEMENT

First Name Diane	MI	Last Name Gubelli	Suffix
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Title
Treasurer

3. TELEPHONE & EMAIL ADDRESS OF INDIVIDUAL FILING INDEPENDENT EXPENDITURE STATEMENT

(Include Area Code) 212-583-6000	Email Address info@independenceusapac.org
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4. DATE (Check One Box)

Primary _____ Election Nov. 4, 2014 Referendum _____

5. TYPE OF REPORT (Check One Box)

<input type="checkbox"/> January 10	<input type="checkbox"/> 7th day preceding primary	<input type="checkbox"/> 7th day preceding referendum	<input type="checkbox"/> 24 hour Independent Expenditure Statement for Primary
<input type="checkbox"/> April 10	<input type="checkbox"/> 30 days following primary	<input checked="" type="checkbox"/> 24 hour Independent Expenditure Statement for Election	
<input type="checkbox"/> July 10	<input type="checkbox"/> 7th day preceding election	<input type="checkbox"/> 90 days following referendum	<input type="checkbox"/> 24 hour Independent Expenditure Statement for Special Election
<input type="checkbox"/> October 10	<input type="checkbox"/> 7th day preceding special election		<input type="checkbox"/> Amendment to (Type of Report)
	<input type="checkbox"/> 45 days following special election		

6. PERIOD COVERED

Beginning Date	Ending Date
<u>October 27, 2014</u>	<u>October 27, 2014</u>

through

7. CERTIFICATION OF INDIVIDUAL FILING THE INDEPENDENT EXPENDITURE STATEMENT

I hereby certify and state, under penalties of false statement, that I have accepted my appointment as the individual authorized to file the Independent Expenditure Statement on behalf of the person. I further certify and state, under the penalties of false statement, that the information set forth on this Independent Expenditure Statement is a true, accurate and complete itemization of expenditures made or obligated to be made by the person, for the period covered, and that these expenditures and obligations were made independent of any other individual, political committee, party committee, or candidate committee, or agent thereof, and that the person has not been reimbursed.

	Diane Gubelli	10/28/2014
SIGNATURE	PRINT NAME OF SIGNER	DATE (mm/dd/yyyy)

INDEPENDENT EXPENDITURES

NAME OF PERSON MAKING THE INDEPENDENT EXPENDITURE <i>(As reported on Page 1, Line 1)</i>	TYPE OF REPORT
Independence USA PAC	24 Hour Election

SUMMARY		
	COLUMN A This Period	COLUMN B Aggregate
8. Expenditures Made by a Person <i>(Section A - Page 3)</i>	\$17,803.43	\$1,734,502.18
9. Expenditures Obligated by a Person This Period but Not Paid <i>(Section B - Page 4)</i>	\$0.00	
10. Total Outstanding Expenditures Obligated by a Person still Unpaid <i>(Section B - Page 4)</i>	\$0.00	

INDEPENDENT EXPENDITURES

NAME OF PERSON MAKING INDEPENDENT EXPENDITURE <i>(As reported on Page 1, Line 1)</i>		TYPE OF REPORT	
Independence USA PAC		24 Hour Election	
A. Independent Expenditures Made by Person			
Name of Payee			Date of Expenditure
SKD Knickerbocker			10/27/2014
Street Address		City	State Zip Code
1150 18th Street NW, Suite 800		Washington	DC 20036
Independent Expenditure on behalf of more than one candidate?	Description		
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <i>If yes, complete Section A. Addendum</i>	Gun safety ad		
Name of Candidate <i>(only complete if Independent Expenditure is on behalf of ONE candidate—if more than one, Complete Section A. Addendum)</i>		Office Sought	<input type="checkbox"/> Supported <input checked="" type="checkbox"/> Opposed
Thomas Foley		Governor	
Purpose of Expenditure <i>(by code)</i>	Expenditure Number <i>(if applicable)</i>	Associated with Referendum?	Amount
A-TV	0002	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	\$17,803.43
Name of Payee			Date of Expenditure
Street Address		City	State Zip Code
Independent Expenditure on behalf of more than one candidate?	Description		
<input type="checkbox"/> Yes <input type="checkbox"/> No <i>If yes, complete Section A. Addendum</i>			
Name of Candidate <i>(only complete if Independent Expenditure is on behalf of ONE candidate—if more than one, Complete Section A. Addendum)</i>		Office Sought	<input type="checkbox"/> Supported <input type="checkbox"/> Opposed
Purpose of Expenditure <i>(by code)</i>	Expenditure Number <i>(if applicable)</i>	Associated with Referendum?	Amount
		<input type="checkbox"/> Yes <input type="checkbox"/> No	
Name of Payee			Date of Expenditure
Street Address		City	State Zip Code
Independent Expenditure on behalf of more than one candidate?	Description		
<input type="checkbox"/> Yes <input type="checkbox"/> No <i>If yes, complete Section A. Addendum</i>			
Name of Candidate <i>(only complete if Independent Expenditure is on behalf of ONE candidate—if more than one, Complete Section A. Addendum)</i>		Office Sought	<input type="checkbox"/> Supported <input type="checkbox"/> Opposed
Purpose of Expenditure <i>(by code)</i>	Expenditure Number <i>(if applicable)</i>	Associated with Referendum?	Amount
		<input type="checkbox"/> Yes <input type="checkbox"/> No	
SUBTOTAL Section A. - This Page		\$17,803.43	
TOTAL of additional Section A. Pages		\$17,803.43	
TOTAL OF ALL INDEPENDENT EXPENDITURES MADE BY PERSON THIS PERIOD <i>(Enter total on Column A, Line 8)</i>		\$17,803.43	

INDEPENDENT EXPENDITURES

NAME OF PERSON MAKING INDEPENDENT EXPENDITURE <i>(As reported on Page 1, Line 1)</i>			TYPE OF REPORT	
B. Independent Expenditures Obligated by Person this Period but Not Paid				
Name of Creditor			Date Obligated	
Street Address		City	State	Zip Code
Independent Expenditure on behalf of more than one candidate? <input type="checkbox"/> Yes <input type="checkbox"/> No <i>If yes, complete Section B. Addendum</i>	Description			
Name of Candidate <i>(only complete if Independent Expenditure is on behalf of ONE candidate—if more than one, Complete Section B. Addendum)</i>			Office Sought	<input type="checkbox"/> Supported <input type="checkbox"/> Opposed
Purpose of Expenditure <i>(by code)</i>	Expenditure Number <i>(if applicable)</i>	Associated with Referendum? <input type="checkbox"/> Yes <input type="checkbox"/> No	Amount Obligated	
Name of Creditor			Date Obligated	
Street Address		City	State	Zip Code
Independent Expenditure on behalf of more than one candidate? <input type="checkbox"/> Yes <input type="checkbox"/> No <i>If yes, complete Section B. Addendum</i>	Description			
Name of Candidate <i>(only complete if Independent Expenditure is on behalf of ONE candidate—if more than one, Complete Section B. Addendum)</i>			Office Sought	<input type="checkbox"/> Supported <input type="checkbox"/> Opposed
Purpose of Expenditure <i>(by code)</i>	Expenditure Number <i>(if applicable)</i>	Associated with Referendum? <input type="checkbox"/> Yes <input type="checkbox"/> No	Amount Obligated	
Name of Creditor			Date Obligated	
Street Address		City	State	Zip Code
Independent Expenditure on behalf of more than one candidate? <input type="checkbox"/> Yes <input type="checkbox"/> No <i>If yes, complete Section B. Addendum</i>	Description			
Name of Candidate <i>(only complete if Independent Expenditure is on behalf of ONE candidate—if more than one, Complete Section B. Addendum)</i>			Office Sought	<input type="checkbox"/> Supported <input type="checkbox"/> Opposed
Purpose of Expenditure <i>(by code)</i>	Expenditure Number <i>(if applicable)</i>	Associated with Referendum? <input type="checkbox"/> Yes <input type="checkbox"/> No	Amount Obligated	
Name of Creditor			Date Obligated	
Street Address		City	State	Zip Code
Independent Expenditure on behalf of more than one candidate? <input type="checkbox"/> Yes <input type="checkbox"/> No <i>If yes, complete Section B. Addendum</i>	Description			
Name of Candidate <i>(only complete if Independent Expenditure is on behalf of ONE candidate—if more than one, Complete Section B. Addendum)</i>			Office Sought	<input type="checkbox"/> Supported <input type="checkbox"/> Opposed
Purpose of Expenditure <i>(by code)</i>	Expenditure Number <i>(if applicable)</i>	Associated with Referendum? <input type="checkbox"/> Yes <input type="checkbox"/> No	Amount Obligated	
SUBTOTAL Section B. - This Page				
TOTAL of additional Section B. Pages				
TOTAL OF ALL INDEPENDENT EXPENDITURES OBLIGATED BY PERSON DURING THIS PERIOD BUT NOT PAID <i>(Enter total on Column A, Line 9)</i>				
Previous Reported Independent Expenditures Unpaid and Still Outstanding				
TOTAL OF ALL INDEPENDENT EXPENDITURES OBLIGATED BUT NOT PAID <i>(Enter total on Column A, Line 10)</i>				

NAME OF PERSON MAKING INDEPENDENT EXPENDITURE <i>(As reported on Page 1, Line 1)</i>		TYPE OF REPORT	
C. Itemization of Reimbursements			
Name of Individual Reimbursed			
Name of Vendor, Person or Entity Paid by Individual			
Street Address of Vendor, Person or Entity		City	State Zip Code
Date of Payment to Vendor, Person or Entity	Purpose of Expenditure <i>(by code)</i>	Expenditure Number <i>(if applicable)</i>	
Description			Amount
Name of Individual Reimbursed			
Name of Vendor, Person or Entity Paid by Individual			
Street Address of Vendor, Person or Entity		City	State Zip Code
Date of Payment to Vendor, Person or Entity	Purpose of Expenditure <i>(by code)</i>	Expenditure Number <i>(if applicable)</i>	
Description			Amount
Name of Individual Reimbursed			
Name of Vendor, Person or Entity Paid by Individual			
Street Address of Vendor, Person or Entity		City	State Zip Code
Date of Payment to Vendor, Person or Entity	Purpose of Expenditure <i>(by code)</i>	Expenditure Number <i>(if applicable)</i>	
Description			Amount
Name of Individual Reimbursed			
Name of Vendor, Person or Entity Paid by Individual			
Street Address of Vendor, Person or Entity		City	State Zip Code
Date of Payment to Vendor, Person or Entity	Purpose of Expenditure <i>(by code)</i>	Expenditure Number <i>(if applicable)</i>	
Description			Amount
SUBTOTAL Section C. - This Page			
TOTAL of additional Section C. Pages			
TOTAL OF ALL REIMBURSEMENTS			

INDEPENDENT EXPENDITURES

NAME OF PERSON MAKING INDEPENDENT EXPENDITURE <i>(As reported on Page 1, Line 1)</i>	TYPE OF REPORT

D. Covered Transfers in Excess of \$5,000

If the independent expenditures reported in this form were made or obligated to be made on or after the date that is one hundred and eighty (180) days prior to the applicable primary or election, you must report any "covered transfers" received during the twelve month period prior to the applicable primary or election that are five thousand dollars or more in the aggregate.

One or more of the pertinent covered transfers have been reported to the Federal Election Commission (FEC) or Internal Revenue Service (IRS) and the person filing this form has submitted a copy of that previously filed report in lieu of reporting such covered transfers here.

If this box is checked please list the applicable FEC Filer ID Number or IRS Employer Identification Number here:

FEC Filer ID or IRS EIN # C00532705 (disclosed below)

Note: Any covered transfers occurring within the relevant time period and not reported on the attached FEC or IRS filings must be reported below.

Source of Covered Transfer—Name of Person Making Covered Transfer		
Michael R. Bloomberg		

Address of Person Making Covered Transfer—City	State	Zip Code
New York	NY	10022

Source of Covered Transfer—Name of Individual who Signed Check or Authorized Covered Transfer	Amount
Michael R. Bloomberg	\$10,384,422

Source of Covered Transfer—Name of Person Making Covered Transfer		

Address of Person Making Covered Transfer—City	State	Zip Code

Source of Covered Transfer—Name of Individual who Signed Check or Authorized Covered Transfer	Amount

Source of Covered Transfer—Name of Person Making Covered Transfer		

Address of Person Making Covered Transfer—City	State	Zip Code

Source of Covered Transfer—Name of Individual who Signed Check or Authorized Covered Transfer	Amount

Source of Covered Transfer—Name of Person Making Covered Transfer		

Address of Person Making Covered Transfer—City	State	Zip Code

Source of Covered Transfer—Name of Individual who Signed Check or Authorized Covered Transfer	Amount

See Additional Page(s)

INDEPENDENT EXPENDITURES

NAME OF PERSON MAKING INDEPENDENT EXPENDITURE <i>(As reported on Page 1, Line 1)</i>		TYPE OF REPORT	
Independence USA PAC		24 Hour Election	
E. Five Largest Covered Transfers Disclosed in Communication			
<p>If the independent expenditure reported in this form was for a communication made or obligated to be made on or after the date that is ninety (90) days immediately prior to the applicable primary or election, please report the five largest aggregate "covered transfers" received during the received during the twelve month period prior to the applicable primary or election.</p>			
Source of Covered Transfer—Name of Person Making Covered Transfer		Expenditure Number	
Michael R. Bloomberg		<i>Section</i>	<i>Number</i>
			0002
Address of Person Making Covered Transfer—City		State	Zip Code
New York		NY	10022
Source of Covered Transfer—Name of Individual who Signed Check or Authorized Covered Transfer		Amount	
Michael R. Bloomberg		\$10,384,422	
Source of Covered Transfer—Name of Person Making Covered Transfer		Expenditure Number	
		<i>Section</i>	<i>Number</i>
Address of Person Making Covered Transfer—City		State	Zip Code
Source of Covered Transfer—Name of Individual who Signed Check or Authorized Covered Transfer		Amount	
Source of Covered Transfer—Name of Person Making Covered Transfer		Expenditure Number	
		<i>Section</i>	<i>Number</i>
Address of Person Making Covered Transfer—City		State	Zip Code
Source of Covered Transfer—Name of Individual who Signed Check or Authorized Covered Transfer		Amount	
Source of Covered Transfer—Name of Person Making Covered Transfer		Expenditure Number	
		<i>Section</i>	<i>Number</i>
Address of Person Making Covered Transfer—City		State	Zip Code
Source of Covered Transfer—Name of Individual who Signed Check or Authorized Covered Transfer		Amount	
Source of Covered Transfer—Name of Person Making Covered Transfer		Expenditure Number	
		<i>Section</i>	<i>Number</i>
Address of Person Making Covered Transfer—City		State	Zip Code
Source of Covered Transfer—Name of Individual who Signed Check or Authorized Covered Transfer		Amount	

See Additional Page(s)

INDEPENDENT EXPENDITURES

NAME OF PERSON MAKING INDEPENDENT EXPENDITURE <i>(As reported on Page 1, Line 1)</i>		TYPE OF REPORT	
F. Nesting Dolls Provision for Top 5 Covered Transfers Disclosed in Communication			
Name of Person Making Covered Transfer to Person Reported in Section E.			
Address of Person Making Covered Transfer—City <i>(if known)</i>		State	Zip Code
Name of Person Receiving Covered Transfer as Reported in Section E.			Expenditure Number
Name of Person Making Covered Transfer to Person Reported in Section E.			
Address of Person Making Covered Transfer—City <i>(if known)</i>		State	Zip Code
Name of Person Receiving Covered Transfer as Reported in Section E.			Expenditure Number
Name of Person Making Covered Transfer to Person Reported in Section E.			
Address of Person Making Covered Transfer—City <i>(if known)</i>		State	Zip Code
Name of Person Receiving Covered Transfer as Reported in Section E.			Expenditure Number
Name of Person Making Covered Transfer to Person Reported in Section E.			
Address of Person Making Covered Transfer—City <i>(if known)</i>		State	Zip Code
Name of Person Receiving Covered Transfer as Reported in Section E.			Expenditure Number
Name of Person Making Covered Transfer to Person Reported in Section E.			
Address of Person Making Covered Transfer—City <i>(if known)</i>		State	Zip Code
Name of Person Receiving Covered Transfer as Reported in Section E.			Expenditure Number
Name of Person Making Covered Transfer to Person Reported in Section E.			
Address of Person Making Covered Transfer—City <i>(if known)</i>		State	Zip Code
Name of Person Receiving Covered Transfer as Reported in Section E.			Expenditure Number

See Additional Page(s)

CODED PURPOSES FOR EXPENDITURES

(For use with SEEC Form 26—SHORT)

(Note: Asterisk * adjacent to the left of an Expenditure Code indicates that Description Field is Mandatory)

Advertising: Each expenditure code beginning with "A-" is to be used to identify the delivery method for paid advertising, which includes advertising to solicit funds. Include the costs for *both* the **development** *and* the **delivery** of the message. A payment to a professional consultant to develop a message should be coded to the main advertising delivery method below. If a single advertising message is developed for several of the delivery mechanisms listed below, report all applicable codes for the cost of developing the message and then use the applicable code for the payments associated with the several delivery methods used.

A-DM: expenditure to advertise through direct mail.

A-MAG: expenditure to advertise through a magazine.

A-NEWS: expenditure to advertise through a newspaper.

A-ATM: expenditure to advertise using an automated telephone/fax message, or an automated telemarketing message.

A-PH-BNK: expenditure for the use of phone banks, where people are speaking as distinguished from pre-recorded messages (above) and polls and surveys (below).

A-RAD: expenditure to advertise on radio.

A-SIGN: expenditure for the cost of preparing, printing, producing or distributing lawn or billboard signs visible from any street or highway.

A-TV: expenditure to advertise on television.

A-WEB: expenditure to advertise on the World Wide Web. This includes webcasting (sending audio and/or video live over the Internet), or any other form of advertising on the web. See **WEB** for other web related expenditures.

A-OTH: any expenditure for any other advertising, not listed above, like the cost of (a) posters, stickers, streamers, banners, etc. for distribution on or in buildings or vehicles (i.e. cars, buses, boats, aircraft, etc.); (b) campaign paraphernalia, such as pins, hats, potholders, tee shirts and other campaign giveaway items; (c) audio messages and the cost of transmitting them by speakers from vehicles or buildings; (d) ad placed in ad books, in schools or civic organizations' pamphlets or bulletins, or (e) ad books for fundraising events held by other committees.

OFFICE: expenditures for office supplies such as paper, pens, printer cartridges, etc.

POLLS: expenditures associated with conducting polls and surveys. This category is to be distinguished from **A-PH-BNK** (phone banks) because the information isn't just delivered to the public but opinion is carefully being sought and collected from the public in some manner to produce a poll or survey result or report.

POST: expenditures for postage, such as stamps, bulk mail permits, post office boxes and envelopes, United Parcel Service, Federal Express, etc.

PRNT: expenditures associated with the costs of printing, photocopying or reproducing literature, stationery, invitations and the like.

RMB: expenditures to Reimburse Individuals. This is when the cost of payment for something needed by the person is advanced by the individual and reimbursement is sought and obtained from the person who authorized the payment. After making payment to the individual in Section A., report the name of each Vendor paid by the individual in Section C., "Itemization of Reimbursements."

WEB: Expenditures for accessing and having a presence on the WEB. This includes payments to develop or maintain: (a) a website and homepage; (b) an internet provider; (c) a domain name on the internet; and (d) similar costs relating to use of the internet. This is not to be used for any costs related to advertising on the web. See **A-WEB** above.

***MISC:** expenditures of Miscellaneous items that are not listed above. The text box of the **Description Field**, which is mandatory, must explain in narrative form, with sufficient clarity, the purpose of this expenditure. If more than one of the above codes applies to an expenditure, do not use **MISC** and instead report all applicable codes.