

**DR. ORLY TAITZ ESQ**

**PRESIDENT**

**DEFEND OUR FREEDOMS FOUNDATION**

**29839 SANTA MARGARITA, STE 100**

**RANCHO SANTA MARGARITA, CA 92688**

**PH 949-683-5411**

**FAX 949-766-7687**

**ORLY.TAITZ@HUSHMAIL.COM**

**Attention**

Federal Election Commission  
FOIA Requester Service Center  
Room 408  
999 E Street, NW  
Washington, DC 20463

Fax number:

(202) 219-1043

Electronic mail address:

[FOIA@fec.gov](mailto:FOIA@fec.gov)

**REQUEST FOR INFORMATION UNDER FREEDOM OF INFORMATION**

**ACT 5 USC 552, COMPLAINT AND REQUEST FOR INVESTIGATION IN**

**REGARDS TO POSSIBLE COORDINATION AND COMMINGLING OF**

**FUNDS BETWEEN KEEP THE PROMISE 1 SUPERPAC, MAKE**

**AMERICA AWESOME SUPERPAC AND THE PRESIDENTIAL**

**CAMPAIGNS OF SENATOR TED CRUZ AND MS. CARLY FIORINA**

1. Keep the promise SuperPAC was created to support Senator Ted Cruz in his bid for president in the 2016 election. The home page of this superPAC states:

### "About Us

Keep the Promise I is dedicated to the restoration of America's greatness, at home and abroad. Our federal government has become a bloated morass of dysfunctional, unresponsive elites.

Cronyism, back room deals, executive orders, and inept foreign policy have become business as usual. We are committed to stopping this broken system.

That is why Keep the Promise I proudly supports Ted Cruz, a seasoned and firm Constitutionalist.

As President, Ted Cruz will:

- Restore the faith in a smaller federal government
- Ensure equal opportunity for ALL Americans
- Unleash a dynamic free market
- Rebuild our national defense
- Restore our standing around the world

Join us." <http://www.keepthepromise1.com/about/>

Donors have given to this superPAC with a clear reliance on its mission statement that the donations will be used to assist Senator Cruz. However, according to recent FEC filing, \$500,000 was given to the campaign of Carly Fiorina. As such, information is hereby requested under 5USC 552 Freedom of Information Act of any and all documentation of actions taken by the FEC against this superPAC and the campaigns of Ted Cruz and Carly Fiorina in regards to this misappropriation of funds and fraud of the donors.

If no action was taken, a request is being made herein for investigation and action based on fraudulent diversion of this aforementioned half a million dollars of donations.

2. It was reported in a number of articles (Exhibit 2) that allegedly aforementioned half a million dollars was given to Fiorina campaign by Cruz superPAC to keep Fiorina quiet due to alleged affair and cooperation between Fiorina's deputy campaign manager Sarah Isgur Flores and Ted Cruz. Again, under 5 USC 552, it is hereby requested for the FEC to provide any and all documentation of any action taken on this matter. If no action was taken, it is hereby requested for FEC to investigate whether there was a coordination between Keep The Promise 1 superPAC and Cruz and Fiorina campaigns to improperly divert the donations to silence Fiorina.

3. After near zero showing in polls and primaries Fiorina suspended her campaign and is currently campaigning in support of Cruz and appearing with Cruz at his rallies, mostly as an opener, to warm up Cruz supporters prior to Cruz speeches. Fiorina's campaign employee, Liz Mayer, opened yet another superPAC, "Keep America Oweesome".

<http://makeamericaawesome.com/about/#sthash.peFTMhGP.dpbs>.

This superPAC has been circulating unflattering pictures of Melania Trump, wife of the leading presidential candidate, Donald Trump. Considering Liz Mayer's

work for Fiorina and current Fiorina's work for Cruz campaign, it appears that there is a collusion to create another bogus superPAC and impermissible coordination between this superPAC and Fiorina and Cruz campaigns. What makes this even more suspicious, is the fact that both Fiorina campaign and "Make America Oweome" superPAC provide the same address for donations: PO Box 26141, Alexandria, VA, 22313, which raises a presumption of comingling of funds (Exhibit 1). As such, it is hereby requested under 5USC 552 for any and all documentation in possession of FEC on this matter and for an investigation due to impermissible coordination between aforementioned campaigns and superPACs.

Respectfully,

/s/ Dr. Orly Taitz, ESQ

President

Defend Our Freedoms Foundation

03.26.2016

Exhibit 1

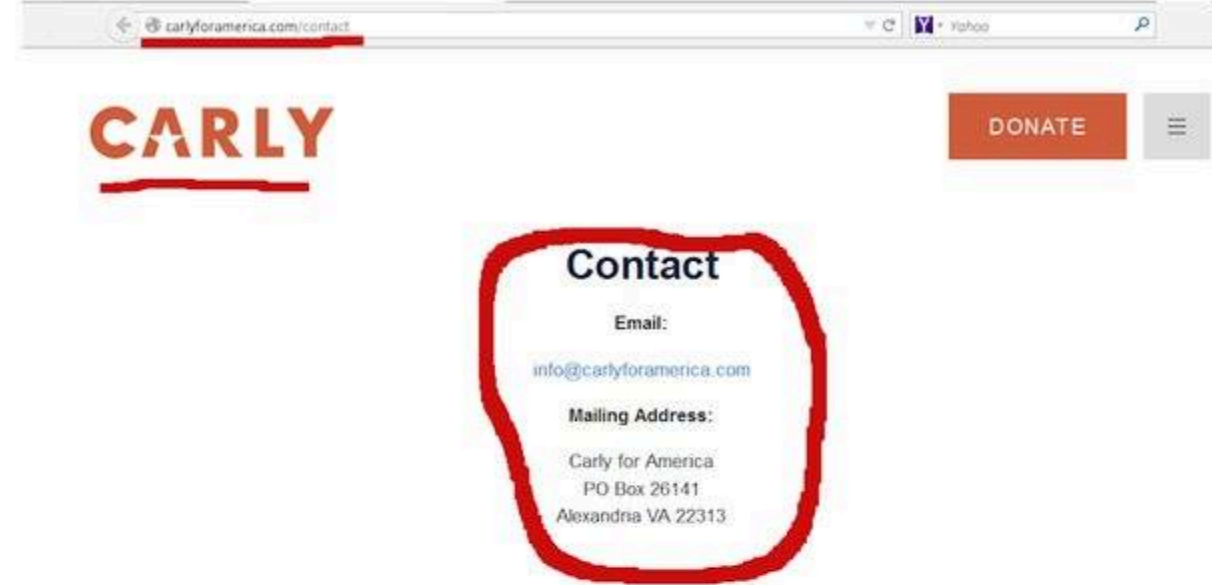
image: [http://dcwhispers.com/wp-content/uploads/2015/05/dc\\_whispers\\_header\\_logo1020x120.jpg](http://dcwhispers.com/wp-content/uploads/2015/05/dc_whispers_header_logo1020x120.jpg)

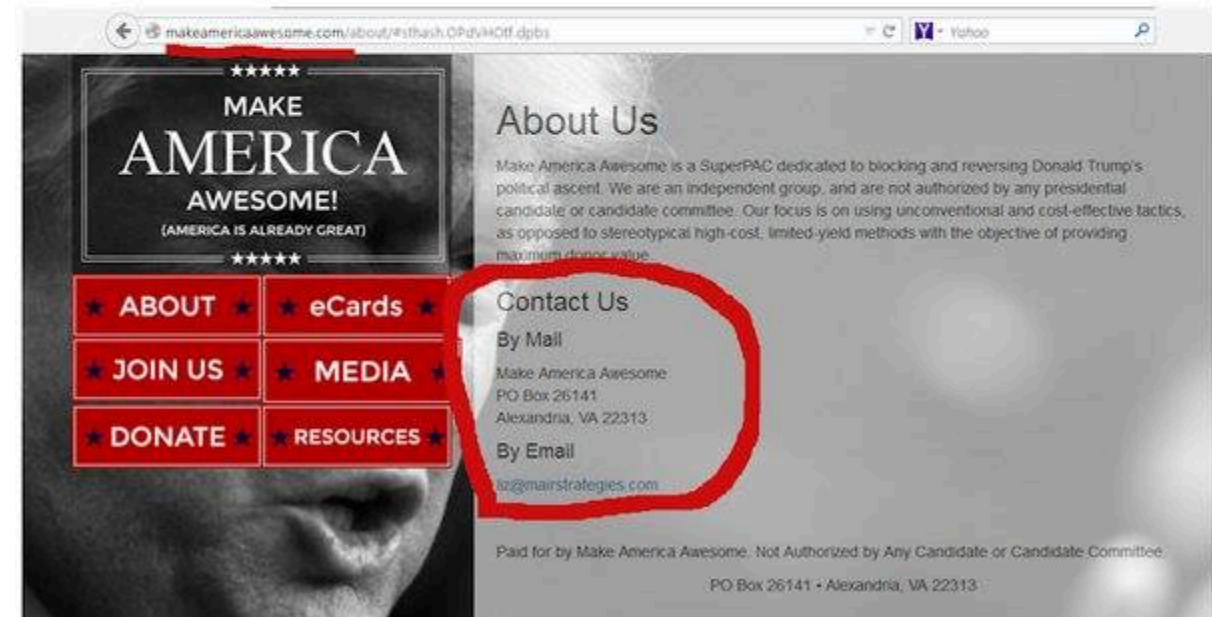
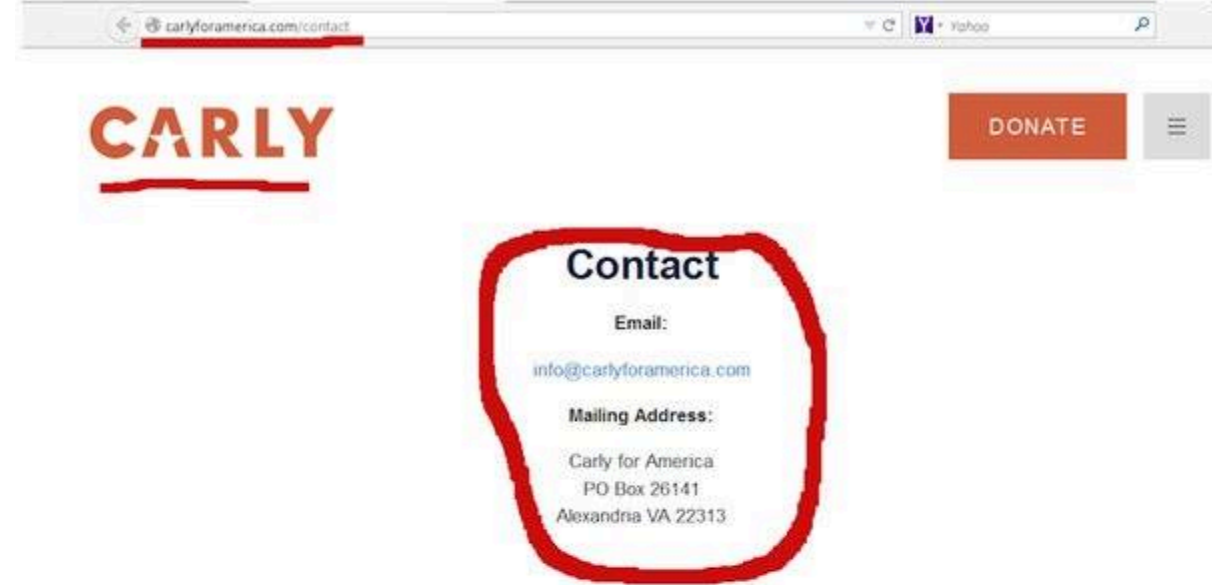


**BUSTED! TED CRUZ SUPER PAC HAS SAME ADDRESS AS FIORINA CAMPAIGN...**

Posted on [March 25, 2016](#), by [DCWhispers](#)  
34 [Tweet](#) 35 [Reddit](#) 0

Check out this bit of Internet information regarding the recently established MAKE AMERICA AWESOME Ted Cruz Super PAC that infamously used a sixteen year old GQ modeling photo of Donald Trump's wife to sway Mormon voters in Utah to not vote for Trump. (implying that Mrs. Trump is cheap/of questionable character.)

Make America Awesome was formed almost immediately after Carly Fiorina endorsed Ted Cruz. It is headed by a former Fiorina staffer. And now this:  




Add to the above information the fact that during the summer months a Ted Cruz Super PAC “donated” \$500,000 to a Carly Fiorina Super PAC – a donation that has yet to be explained by either campaign. That unexplained \$500,000 has received renewed interest following yesterday’s National Enquirer report alleging Senator Cruz has been involved in multiple extra-marital affairs. It should be noted that no proof of those affairs has yet been made public, though one of the women involved was working for Carly Fiorina at the time of the Cruz to Fiorina \$500,000 donation this past summer.

And now the same address used by the now-defunct Fiorina campaign is the address for the pro Tex Cruz, anti-Donald Trump Super PAC, MAKE AMERICA AWESOME.

It should also be noted that a benefit of Super PACs is the fact they are subject to far less stringent campaign finance oversight than are the individual candidate campaign operations.

Hmmmm...

Read more at <http://dcwhispers.com/busted-ted-cruz-super-pac-address-fiorina-campaign/#3oP2UOSK9vQ72GjW.99>

## Exhibit 2

[Post Politics](https://www.washingtonpost.com/news/post-politics/wp/2015/07/31/why-did-a-ted-cruz-super-pac-donate-to-carly-fiorina/) <https://www.washingtonpost.com/news/post-politics/wp/2015/07/31/why-did-a-ted-cruz-super-pac-donate-to-carly-fiorina/>

# Why did a Ted Cruz super PAC give \$500,000 to Carly Fiorina’s?

State of the 2016 race

By [Jose A. DelReal](#) July 31, 2015

Republican presidential candidate, former Hewlett-Packard CEO Carly Fiorina, left, greets potential voters at a campaign event at New Boston Central School, Tuesday, June 9, 2015, in New Boston, N.H. (AP Photo/Elise Amendola)

**A super PAC supporting former tech executive Carly Fiorina's run reported raising \$3.5 million -- with a half-million dollar lift from a super PAC supporting GOP presidential rival Sen. Ted Cruz (R-Tex.).**

The pro-Cruz PAC, Keep the Promise I, reported the disbursement Friday in a document filed with the Federal Election Commission. That is...unusual, to say the least.

# ITEMIZED DISBURSEMENTS

## Line #: 29

### Committee: KEEP THE PROMISE I

Disbursement To	Address	Election Type	Disb
BRACEWELL & GIULIANI LLP	PO BOX 848566 DALLAS, Texas 75284		06/1
CARLY FOR AMERICA	PO BOX 26141 ALEXANDRIA, Virginia 22313		06/1
THE POLLING COMPANY	400 NORTH CAPITOL STREET NW STE 790 WASHINGTON, DC 20001		06/1

Cruz has four allied super PACs, all named some variation of “Keep the Promise.” Together they raised an estimated \$38 million, according to FEC documents.

Jose A. DelReal covers national politics for The Washington Post.

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## Did Ted Cruz Pay ‘Hush Money’ to Carly Fiorina Over #CruzSexScandal?

Published 3:33 am EDT, March 25, 2016 Updated 5:37 pm EDT, March 25, 2016 23 Comments

By [Anthony Bennett](#)

48.9k

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Ted Cruz at a campaign event in Wisconsin. (Getty)

Did 2016 Republican Presidential contender [Ted Cruz](#) pay Carly Fiorina’s campaign to keep her quiet about an affair? It’s unlikely, but Twitter speculation abounds.



Chatter about the “scandal” stems entirely from a [National Enquirer story](#) that hit newsstands March 25, alleging Cruz had affairs with five women. The Enquirer ran pixelated headshots of five women that the tabloid claims had affairs with Cruz. One of the headshots appears to be of Carpenter, but there’s no evidence to back up the Enquirer’s report.

A Ted Cruz-affiliated Super PAC, Keep the Promise I, [donated \\$500,000](#) to rival Carly Fiorina’s presidential campaign in July 2015. The Washington Post noted that the donation was “unusual” at the time, but Twitter and the National Enquirer claim to have a key piece of context: Cruz was having an affair with Fiorina staffer Sarah Isgur Flores.

The Enquirer claims that Cruz cheated on his wife with [five different women](#) over the course of his campaign. While the Enquirer pixelated the photos it ran with the story, Twitter sleuths posting at [#CruzSexScandal](#) have claimed to unravel a few of the mysteries:

Sarah Isgur Flores, in the center of the supposed de-pixelated photos above, [worked for the Fiorina campaign](#) during the 2016 election. As goes the theory, when Fiorina found out about the affair, Cruz silenced her with a half-million-dollar donation.

It bears repeating that no one has proof of anything, and Fiorina has herself [endorsed and campaigned with](#) Cruz since ending her campaign. Moreover, a photo from Flores’s Twitter shows Fiorina and the Cruz family being quite friendly:



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[Sarah Isgur Flores](#) @whignewtons

FEC complaint and FOIA request for information

.@CarlyFiorina saying hi to Caroline before the debate. #CruzCrew

4:47 PM - 10 Mar 2016

<http://heavy.com/news/2016/03/ted-cruz-hush-money-carly-fiorina-sex-scandal-affair-sarah-isgur-flores/>