

Turning a Dark Money “_(ツ)_/” into Dark Money (-■_■)

A comprehensive, but not exhaustive, checklist

By Robert Maguire

Twitter: @RobertMaguire_

Email: robert@crp.org

Think of Dark Money research as a fractal equation. Your original, core set of information and the tools you know you have at your disposal are the equation. Each time you run the equation you are gathering a few more names, a few more addresses, and a few more vendors or associated groups, then, you plug all of those new pieces of information back into the equation, and gradually widen the network of stakeholders relevant to your research.

It goes something like this:

- Do you have an address? Any address. Particularly one that’s not a PO Box.
- Have you run that address through all data you can get your hands on? If you’re looking at a group that’s buying ads in a federal political race, check **FEC data** first (even if the group itself isn’t reporting their ads). Check all facets of the data – **expenditures, receipts, summary information**. Then move on to the next sets of data:
 - **IRS Business Master File**: Contains summary information for all 501(c) organizations that **have been recognized** by the IRS. If your group is in this data, it means (for now, at least¹) that you can go to the group and request that they provide their **1024 application materials** to you. They are required, under Section 6104 of the US Code to do so.
 - **IRS 527 search** (Google “political organization disclosure” and you’ll see it): Check expenditures, receipts and group locations. Again, you are looking to establish linkages to other organizations, not necessarily looking for 527s themselves. Pay attention to names of people involved with the groups, major vendors and their addresses, other contact information like phone numbers. Many outside groups are run by consultants – and some are simply scams for them to make money off of.
 - **State incorporation records**: Some organizations will list an address publicly that is not the address that they use for their actual business. And sometimes the public address is not even in the state in which the group is incorporated, usually, though, it is. The fastest way to find a state’s corporation records is usually to simply Google “[insert state] entity search.” You’ll quickly learn which states provide valuable information, and which ones don’t. Delaware, for example, is known for providing next to nothing, while states like Virginia and Arizona have a fair amount of information.

¹ The IRS has essentially just done away with 1024 applications, and it’s not clear how that will change what groups are input into the business master file, or how groups that haven’t officially had their status approved by the IRS will show up in the data.

- **State charitable registration records:** Some states require organizations raising money in their state to file certain paperwork – which can be as little as a simple statement of organization to a wider set of financial records, including annual tax returns.
- Have you begun constructing webs of linkages between locations and names that pop up? Do you know the vendors being paid by the group? Who else is paying them? Are the candidates paying those vendors **or vendors located at the same address or run by the same people?** Who works there? Are those people involved in other groups? What is the address of the vendor? Have you checked incorporation records in the state? Do they list another address? Is it the same as the group itself?

Internet Resources:

OpenSecrets.org (Center for Responsive Politics)

- Reporting; SIGN UP FOR OUR NEWSLETTER!
<https://www.opensecrets.org/resources/newsletter/>
- Comprehensive list of politically active nonprofits, and summary pages that meld IRS and FEC data over time for all known organizations active – as donors or political groups -- in federal elections
- Top Level financial information and trends for dark money organizations.
- Search tools allowing users to dive into IRS 990 Extracts – a data set released once a year comprising data from all recognized 501(c)s that filed a 990 in a given year
- COMING VERY SOON:
 - Additional search and customizable download functions that use CRP data and GuideStar.org’s fully digitized, structured data from annual 990 tax returns
 - Scaped, standardized Federal Communications Commission data going back to mid-2012 (for major networks) now expanded TKTKTK allowing users to quickly access filings for specific groups on a daily basis, and see how the FCC data matches up with FEC and IRS data.
- CONTACT US! We’re here to help.

Political Ad Tracker (Internet Archive)

- Provides detailed, real-time videos of ads run by all organizations active in 2016 elections, whether or not those organizations have reported their activity to the FEC. The Ad Tracker summary pages for these groups link to relevant CRP data for what the groups have reported to different oversight agencies.

Sunlight Foundation

- Ad Sleuth: The current market standard for FCC data, allowing for searchable, downloadable data going back to mid-2012
- Quick access to recently filed 24/48hr reports from the FEC
- A wide array of useful tools like Scout (tracking mentions of certain words in congressional speeches and judicial decisions)

CitizenAudit.org

- Hundreds of thousands of OCR’d annual tax returns. Great for additional research on known addresses, vendors, and people involved in particular groups.

OpenCorporates.com

- Find incorporation records for organizations, and find other companies/organizations run by people of interest from your research