

Scott Rose  
Minorities Anti-Defamation Professional  
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To the Entire California Fair Political Practices Commission:

Further to my prior communication to you -- (copied below in this e-mail) -- regarding the FPPC case against "Yes on 8"/The National Organization for Marriage (NOM), I wanted to specify that I believe NOM's admission of 18 counts of campaign finance law violations in California should be considered as "PIERCING THE VEIL" on this apparently corrupt organization's illegal schemes being carried out on a large scale, well beyond the California state borders.

Obviously, without Karger having filed his complaint against NOM with the CFPPC, NOM was not going to come forward and admit to 18 counts of campaign finance law violations.

The political ties between NOM at its inception and the LDS Church are documented. In 2010, the NOM-linked LDS Church -- as I'm sure you know -- had to pay fines in California:

Mormons Found Guilty on 13 Counts of Prop 8 Malfeasance, Fined by FPPC

<http://www.californiaprogessreport.com/site/mormons-found-guilty-13-counts-prop-8-malfeasance-fined-fppc>

If the FPPC is not aware of the documented connections between NOM and the LDS Church, I shall upon request provide such documentation.

In other jurisdictions where there is a strong appearance that NOM could be involved in illegal activities, the issue is that prompt, more thorough and professional investigations are needed. It appears evident that heretofore, NOM has been relying on the relatively slow pace of court calendars through appeals processes, to create for NOM an unwarranted public impression that it was not violating any laws.

With its cavalier disregard for campaign finance laws, NOM is subverting the letter and the intent of those laws, in state after state, and in the process, subverting democracy.

For that reason, above all other reasons, I urge the FPPC not to let NOM and its officials enjoy the "easy way out" of paying fines, instead of facing prosecution for their admitted violations of the laws. I also believe there is justification for considering how NOM might be in violation of RICO laws.

To read a warning that NOM received from the Iowa Ethics and Campaign Disclosure Board, go here:  
<http://blogs.desmoinesregister.com/dmr/wp-content/uploads/2009/08/nom.pdf>

Notice that an Iowa official said this:

"I'm not as much concerned with this particular race as I am that Iowa is not going to become a dumping ground for undisclosed campaign contributions," Smithson said in an interview.

The article at this next link -- about NOM's suspect actions in Rhode Island -- includes descriptions of some of NOM's patterns of suspicious behavior:

<http://iowaindependent.com/44089/national-organization-for-marriage-sues-again-to-shield-donors>

NOM's tactic — flaunt an individual state's campaign finance laws by failing to register as a PAC and to report its donors, then sue the state for interfering with free speech if its election board attempts to

force the group to comply — is pretty standard fare by now. The group is engaged in similar lawsuits in California and Maine, and it's currently refusing to register as PAC despite its political activity in the state of Minnesota as well.

Most independent observers predict NOM's challenges will eventually fail — the group has already lost a similar case in the Supreme Court regarding disclosure of its political activity in the state of Washington — but the group's plan, for now, seems to be to delay as long as possible. It's got deep enough pockets to fight these cases in the courts for months — or even years — allowing its political spending in state races, meanwhile, to go undisclosed until long after the elections in question have been decided.

At this next link, descriptions of how NOM's activities in Maine were geared towards subverting campaign finance laws:

<https://www.freespeech.org/text/nom-docs-show-ties-anti-gay-marriage-pac>

The new documents help illuminate NOM's strategy for intervening in anti-gay marriage ballot initiatives at the state level while circumventing campaign finance disclosure laws.

It has been widely reported that NOM President Brian Brown was on the executive committee of Stand for Marriage Maine PAC at the same time that he was heading NOM. Additionally, Stand for Marriage Maine used Schubert Flint Public Affairs, the same campaign public affairs firm used by NOM to support California's Proposition 8 amendment in 2008.

The PFFC should consider, additionally, that the violations of California campaign finance laws to which NOM has admitted involve some secret donations being made through PACs in Alabama. That fact emphasizes the need for NOM's law-breaking activities to be more thoroughly investigated, in order that the trust on which our democracy is based should not be undermined.

I am, believe me, extremely sensitive to freedom-of-speech issues. However, with NOM, there is a striking series of suspect activities creating a very strong appearance that its anti-gay hate mongering serves in part to shore up the Catholic Church of Rome's political goals of seeing no further lifting of statutes of limitations for the prosecution of child rape in the United States. My New York State Senator Thomas Duane's staff told me that if I think Cardinal Dolan fights dirty against gay rights measures, I haven't seen anything, in comparison to what he does behind-the-scenes, fighting Senator Duane's proposed New York State Senate Bill S.3333, which would lift the statutes of limitations in New York for the prosecution of child rape.

I understand that the FPPC must consider laws, and violations of laws, in a strictly non-partisan manner, yet, it is a fact: nationwide, Republicans in their aggregate keep the statutes of limitations for prosecution of child rape in place for the Church, while Democrats seek to lift the statutes of limitations, in order that victims of child sex abuse should be able to seek some form of justice in the courts.

In this context, it must be noted that the Knights of Columbus, allegedly a charitable organization affiliated with the Catholic Church, has given startling donations to NOM, donations that far outstrip the Knights of Columbus's donations to actual charities. In 2009, for example, the Knights of Columbus donated \$1.4 million to NOM.

I previously mentioned -- and am here re-iterating -- my concerns about an apparent IRS shell game that NOM appears to be playing, through some of its top leaders -- including Luis Tellez and Robert George -- who have authority over NOM's 501(c)3 and 501(c)4 branches, as well as over the 501(c)3 Witherspoon Institute.

As previously mentioned, Witherspoon gave a \$55,000 "planning grant" to the University of Texas at Austin's Mark Regnerus, ostensibly to plan a sociological study on gay parents' child outcomes. The plan Regnerus developed and carried out, features a cherry-picked control group of children of married heterosexual parents, in a booby-trapped set-up guaranteed to make gay parents come out looking bad, by means of a test group of children from broken homes whose parents are not actually known to be gay, yet whom Regnerus improperly labelled as gay. Witherspoon obviously had authority to accept or reject Regnerus's booby-trapped study plan before giving him his full \$785,000 in study funding. There is a very disturbing appearance that Witherspoon gave Regnerus the sky-high \$55,000 "planning grant" to make him understand that it was serious about getting him a jaw-dropping \$785,000 in full study funding, if his "study" plan met Witherspoon's requirements for the "study" to be booby-trapped against gay parents and finished on a deadline for pernicious exploitation during the 2012 elections. If reference is needed for what makes the study scientifically invalid, the article at this link is one very good such reference: <http://tinyurl.com/8bq5mfz> Note that that article in turn contains links to such documents as an American Medical Association amicus brief, defining the NOM-funded Regnerus "study" as scientifically invalid.

NOM's 501(c)4 arm would not legally have been able to spend \$785,000 on the study, and subsequently to have used it as a 2012 elections weapon against specific candidates including President Obama. The strong appearance is that NOM's Tellez and George, who also have positions of authority with the Witherspoon Institute, arranged for Regnerus's \$785,000 through Witherspoon even though the intent clearly was for the "study" to be used by NOM as a weapon in the 2012 elections. Mountainous documentation exists for NOM's weaponized political uses of the study; many of those uses include specific endorsements and/or negative endorsements of candidates for elected office, in violation of 501(c)3 (i.e. Witherspoon) tax exempt laws.

Meanwhile, at this stage, nobody knows who gave Witherspoon (and NOM's Robert George's Bradley Foundation, another Regnerus funder) all that money for the Regnerus "study." The University of Texas at Austin has asked the Texas AG for exemptions to multiple reporters' Freedom of Information Act requests, through which the Witherspoon donors for the Regnerus study could perhaps be made known to the public.

There is an unmistakable appearance that the \$785,000 for the Regnerus "study" could have gotten laundered through the Witherspoon Institute -- perhaps, and perhaps even likely from and/or by persons interested in seeing the statutes of limitations for the prosecution of child rape kept in place. NOM overwhelming pushes Republican candidates, and Republican office holders in their aggregate -- unlike Democrats -- keep the statutes of limitations for the prosecution of child rape in place.

I very much regret even having to mention any Democrat/Republican divide, when discussing strictly legal matter of violations of the laws, but, sometimes, it is necessary to have some comprehension of actors' possible motives.

However, as stated above, the chief concern is with upholding the nation's existing laws, such that the trust on which democracy is based should not be undermined.

For that reason, I urge the CFPPC not to allow NOM the "easy way out" of paying fines, and to instead proceed to prosecution of NOM, particularly in ways that would involve the obviously needed, wider investigative net to understand all of NOM's possible illegal activities, now that the "VEIL HAS BEEN PIERCED."

Sincerely,

Scott Rose

Received via email from:

Scott Rose  
Minorities Anti-Defamation Professional  
Phone number Redacted

To the Entire California Fair Political Practices Commission:

This regards your case against the anti-gay-rights group "Yes on 8," which is part of The National Organization for Marriage.

NOM is to American LGBTers what the KKK is to blacks and Jews.

NOM wants to settle your case against it, in order to evade full criminal justice accountability for its law-breaking ways.

Meanwhile, the organization is spending umpteen millions upon tens of millions around the country and the world, demonizing sexual minorities on the basis of known falsehoods (i.e. demonizing lies) hate-mongering and inspiring to violence against us.

In state after state, NOM has apparently violated election finance laws, and then tied up the courts bringing apparently frivolous challenges to the laws, not caring about the waste of tax payers' resources in pursuing those apparently frivolous cases through appeals. If all of these NOM election law violations-related cases had been brought in a single court system, instead of the court systems of many different states, a court almost surely would already have barred NOM from filing any such cases in the future.

NOM must now be given an effective deterrent penalty for having broken at least 18 of California's state campaign finance laws.

As stated above, NOM hate-mongers and incites to violence against sexual minorities.

NOM sponsors anti-gay hate rallies where its hand-selected speakers yell through megaphones that homosexuals are "worthy to death."

To see a video of one such NOM anti-gay hate rally, go here: <http://www.youtube.com/watch?v=LtOMYM-sUkk>

NOM also incites people to believe that gays are not human. For example, NOM's William Duncan led a symposium in an all-day anti-gay hate fest titled "Homosexuals or Homo Sapiens; Who Deserves Protected Class Status?" You can see documentation for NOM's William Duncan having done that, here: <http://tinyurl.com/7npfr2j>

To spell this out for you: NOM says that homosexuals are not human and deserve to die.

We are sick and tired of these arrogant, hateful heterosupremacists believing that they are above the law.

Many top NOM officials also are top officials with other anti-gay hate groups. NOM founder Robert George, for example, is a board member of the Family Research Council, a Southern Poverty Law Center-certified anti-gay hate group. The SPLC classifies groups as hate groups when they continually promulgate demonizing lies against a minority. The SPLC 2012 Intelligence Report on NOM is titled "National Organization for Marriage Continues to Spread Lies Against Gays." You can view that SPLC report here: <http://tinyurl.com/cynruvq>

NOM founder Robert George also is senior fellow of The Witherspoon Institute, whose president Luis Tellez is a NOM board member.

The Witherspoon Institute funded a sociological "study" from the University of Texas at Austin's Mark Regnerus, booby-trapped with malice aforethought to make gay parents look bad. First, Witherspoon/NOM gave Regnerus a \$55,000 "planning grant" for a study on gay parents' child outcomes. After seeing Regnerus's "plan," booby trapped to make gay parents look bad, Witherspoon/NOM arranged for Regnerus to have a known minimum total of \$785,000 in study funding; a jaw-dropping amount for a sociological study that only surveyed 2,988 total people, only 250 of which were labelled, inappropriately and unscientifically, as having been raised by "same sex parents."

Witherspoon/NOM have now fully weaponized that scientifically invalid study, and are deploying it pitilessly against gay people and their rights. You can read a letter signed by over 200 Ph.D.s and M.D.s, complaining about the study's lack of intellectual integrity as well as about the suspicious circumstances under which it got published, here: <http://tinyurl.com/7rk57yr>

To read about the circumstances of the corrupt peer review through which the Witherspoon/NOM commissioned anti-gay hate speech got published in a scientific journal, go here: <http://tinyurl.com/bp8ky88>

Whereas Witherspoon and NOM share top officials in common, NOM is a 501(c)4 while Witherspoon is a tax exempt 501(c)3. There is a strong appearance that in its funding of the Regnerus "study," Witherspoon and NOM were playing a tax laws shell game, paying for the Regnerus study through the 501(c)3 Witherspoon Institute, even though the study was conceived primarily for use as a NOM weapon to defeat President Obama. To read details about Witherspoon/NOM's possible violations of IRS tax laws, go here: <http://tinyurl.com/9g2fngx>

As you see, NOM knows no boundaries for its violations of human decency in attacking its LGBT victims.

NOM now wants to settle with the Fair Political Practices Commission on its 18 counts of campaign finance law violations, for only \$49,000, so it can move ahead as though nothing had happened, continuing to violate laws in its hateful and unwarranted attacks against gay human beings. As mentioned above, in state after state, NOM has apparently violated election finance laws, and then ties up the courts bringing apparently frivolous challenges to the laws, not caring about the waste of tax payers' resources in pursuing those apparently frivolous cases through appeals. If all of these NOM election law violations-related cases had been brought in a single court system, instead of the court systems of many different states, a court almost surely would already have barred NOM from filing any such cases in the future.

NOM must now be given an effective deterrent penalty for having broken at least 18 of California's state campaign finance laws.

A wrist-slap, easy-does-it settlement of \$49,000 does not faze the malicious anti-gay bigots of NOM one iota. The "planning grant" they gave for a weaponized, fraudulent study booby trapped against gay parents was \$55,000, leading to a full study grant of \$785,000. And as mentioned above, NOM meanwhile is spending umpteen millions upon tens of millions around the country and the world, demonizing sexual minorities on the basis of known falsehoods (i.e. demonizing lies) hate-mongering, and inspiring to violence against us.

NOM is laughing in advance at the California Fair Political Practices Commission, believing that the Commission will settle with NOM instead of referring NOM to appropriate authorities for criminal prosecution.

The California Fair Political Practices Commission absolutely must not allow NOM to have the last laugh in their 18 violations of state campaign finance laws.

Sincerely,

Scott Rose