



Tactical Intelligence Report



FBI Washington Field Office, Squad ID-█
 21 October 2020
 8041-WF-█-INTELPRODS

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(U//FOUO) Trump Campaign Funds Layered through Clearinghouse Firm Likely Misused by Campaign Digital Director

(U) Executive Summary

(U//FOUO) FBI Washington Field Office assesses the use of American Made Media Consultants (AMMC) as a clearinghouse for Donald J. Trump for President, Inc. (the Trump campaign) spending is likely^a vulnerable to campaign finance crimes by campaign-connected sub-vendors. FBI Washington Field Office further assesses █ for the Trump campaign and owner/operator of █, was likely an ultimate recipient of Trump campaign disbursements made through █ FBI Washington Field Office further assesses █ likely used Trump campaign funds disbursed through █ for personal or unauthorized use, specifically to gamble at casinos and to pay a former █ government official for unknown reasons.

(U//FOUO) These assessments are made with low confidence,^b based on Federal Election Commission (FEC) reports, other government agency (OGA) sensitive financial information, FBI records, and open source research, with varying degrees of corroboration and access. Additional sources of information – such as casino records, financial transaction supporting documents, and correspondence with FBI New York Field Office, Squad █ – may increase confidence levels or change the assessments.

^a (U) See Appendix A: Expressions of Likelihood.

^b (U) See Appendix B: Confidence in Assessments and Judgments Based on a Body of Information.

(U) Recommendations

(U//FOUO) FBI Washington Field Office recommends requesting voluntary information from MGM National Harbor regarding ██████████ gambling, requesting voluntary information from relevant financial institutions regarding payments to the former Senegalese government official, and corresponding with FBI New York Field Office, Squad ██████, regarding full investigation 205A-NY-████████. These steps may identify information to support the opening of a predicated investigation into Federal election crimes.

(U//FOUO) Campaign Likely Vulnerable to Campaign Finance Crimes by Campaign-Connected Sub-Vendors

(U//FOUO) FBI Washington Field Office assesses the use of AMMC as a clearinghouse for Trump campaign spending is likely vulnerable to campaign finance crimes by campaign-connected sub-vendors. This assessment is based on AMMC conducting work almost solely for the Trump campaign, having no website despite the receipt of over \$273 million in disbursements, obscuring the ultimate recipient of disbursements, and the dual role of ██████ ██████

- (U//FOUO) In March 2018, Brad Parscale became Campaign Manager for the Trump campaign, according to Brad Parscale’s publicly available LinkedIn page. Prior to his promotion, Brad Parscale was Digital & Media Advisor for the Trump campaign, since May 2016.¹
- (U) In April 2018, AMMC was created “to save the campaign money by acting as a clearinghouse for spending that would otherwise be done by outside vendors who typically take commissions on such purchases,” according to a *New York Times* article.²
- (U//FOUO) Two officials from the Trump campaign were directors of AMMC, according to advertising agreement forms filed with the Federal Communications Commission (FCC) in 2019. Sean Dollman was listed as AMMC’s “Director/President/Treasurer” and Alex Cannon was listed as AMMC’s “Vice President/Secretary.”³
 - (U//FOUO) Sean Dollman was at the same time on the Trump campaign payroll, with a monthly salary of \$7,500, according to FEC disbursement data.⁴ Sean Dollman’s position was Assistant Treasurer for the Trump campaign, according to an FEC Form 1 “Statement of Organization.”⁵
 - (U//FOUO) Alex Cannon was at the same time on the Trump campaign payroll, with a monthly salary of \$6,666.67, according to FEC disbursement data.⁶ Alex Cannon’s position was Special Counsel for the Trump campaign, according to a 25 March 2020 Trump campaign press release.⁷
- (U) With the exception of one disbursement, AMMC has only received political committee disbursements from the Trump campaign and the Trump Make America Great Again Committee. The Trump Make America Great Again Committee is a joint fundraising committee.^c

^c (U) A joint fundraising committee is election-related fundraising conducted jointly by a political committee and one or more other political committees or unregistered organizations. (Source: FEC “Joint fundraising with other candidates and political committees,” at <https://www.fec.gov/help-candidates-and-committees/making-disbursements-political-party/joint-fundraising-political-party-committees/>, accessed on 15 September 2020)

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- (U) From 23 May 2018 to 31 August 2020, AMMC reportedly received 357 disbursements totaling \$211,380,422.10 from the Trump campaign, according to FEC disbursement data.⁸
- (U) From 25 October 2018 to 30 June 2020, AMMC reportedly received 150 disbursements totaling \$61,684,954.20 from the Trump Make America Great Again Committee, according to FEC disbursement data.⁹
- (U) On 27 September 2019, AMMC reportedly received \$141,211.63 for “list acquisition” from the Republican National Committee, according to FEC disbursement data.¹⁰
- (U) According to FEC regulations published in Title 11 of the Code of Federal Regulations, “an account shall be kept of all disbursements made by or on behalf of the political committee,” including the “date, amount, and purpose of the disbursement;”¹¹ however, AMMC obscured the ultimate recipient of Trump campaign funds. FEC disbursement data did not go to the next level and provide date, amount, and purpose information on AMMC sub-vendors.
- (U//FOUO) On 1 February 2019, a Twitter user posted about AMMC being “completely opaque” and Brad Parscale replied, “I do NOT own American Made Media Consultants. I receive no percentage of any ad buys from the campaign. We spent millions paying for rallies all over America as well as millions on prospecting and ad buys to help the 2018 midterms. Get your facts straight. #FakeNews.”¹²
- (U) As of 8 October 2020, AMMC did not appear to have a website or active social media presence indicating regular business activity. On 27 April 2018, a publicly available Facebook page was created for “American Made Media Consultants;” however, the Facebook page’s affiliation to AMMC is unknown. As of 8 October 2020, the Facebook page contained no posts, photos, or “about” information.¹³
- (U//FOUO) ██████████ holds roles in both the Trump campaign itself and companies performing work on behalf of the Trump campaign, as discussed in subsequent sections.

(U//FOUO) Campaign Digital Director Was Likely an Ultimate Recipient of Campaign Funds

(U//FOUO) FBI Washington Field Office assesses ██████████ for the Trump campaign and owner/operator of ██████████, was likely an ultimate recipient of Trump campaign disbursements made through AMMC. This assessment is based on Realtime Media, LLC’s company name appearing alongside AMMC’s on advertising agreement forms filed with the FCC. This assessment is also based Trump campaign disbursements to AMMC for short message service (SMS) text messaging, a service provided by Opn Sesame.

- (U) From May 2016 to January 2019, ██████████ was Director of ██████████ ██████████ for the Trump campaign, according to ██████████ publicly available LinkedIn page. In January 2019, ██████████ became Digital Director for the Trump campaign.¹⁴ [*Analyst’s Note:* ██████████ salary is unknown. FEC disbursement data did not contain Trump campaign payroll information regarding ██████████.]
- (U) Since April 2017, ██████████ has been President of ██████████ according to his LinkedIn page.¹⁵ Realtime Media, LLC’s work on behalf of the Trump campaign related to advertisement buys, as the company’s name appeared alongside AMMC’s on

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advertising agreement forms filed with the FCC in 2019.¹⁶ Realtime Media, LLC has reportedly received zero disbursements directly from the Trump campaign, according to FEC disbursement data.¹⁷ [Analyst's Note: Any payments from the Trump campaign to AMMC and then to sub-vendor Realtime Media, LLC were not captured in FEC disbursement data, due to the nature of the reporting.]

- (U) Since May 2017, ██████████ has been CEO of ██████████ according to his LinkedIn page.¹⁸ Opn Sesame is a peer-to-peer texting company and the Trump campaign reportedly has focused on using text messages to directly communicate with supporters, according to a *POLITICO* article.¹⁹ In April 2020, Brad Parscale stated the Trump Campaign would send one billion text messages through election day, according to a *Tampa Bay Times* article.²⁰ Opn Sesame has reportedly received only one disbursement, \$3,061.05 for digital consulting, directly from the Trump campaign, according to FEC disbursement data.²¹ However, from 4 November 2019 to 6 July 2020, AMMC reportedly received 16 disbursements containing "SMS" in their description, totaling \$11,955,984.44, from the Trump campaign and the Trump Make America Great Again Committee, according to FEC disbursement data.²² [Analyst's Note: Any payments from the Trump campaign to AMMC and then to sub-vendor Opn Sesame were not captured in FEC disbursement data, due to the nature of the reporting.]
- (U) As of 9 October 2020, Realtime Media, LLC did not appear to have a website or active social media presence indicating regular business activity. Opn Sesame's website provided information about the company's work on peer-to-peer texting, but contained no information about the company's customers.²³

(U//FOUO) Campaign Digital Director Likely Used Campaign Funds to Gamble at Casinos

(U//FOUO) FBI Washington Field Office assesses ██████████ likely used Trump campaign funds disbursed through AMMC to gamble at casinos, including MGM National Harbor. This assessment is based on the timing of the formation of AMMC and the sudden increase in gambling at casinos by ██████████ that followed.

- (U) On 19 April 2018, AMMC formed as a limited liability corporation in the state of Delaware, according to the Delaware business entity database.²⁴
- (U//FOUO) Prior to 5 May 2018, ██████████ did not gamble at casinos in amounts over \$10,000, ██████████.²⁵
- (U//FOUO) On 5 May 2018, ██████████ sought to evade the Currency Transaction Report (CTR) reporting requirement^d when attempting to redeem \$10,520 in casino chips at MGM National Harbor. ██████████ presented the casino chips to three different cages

^d (U) Federal law requires financial institutions to report currency (cash or coin) transactions over \$10,000 conducted by, or on behalf of, one person, as well as multiple currency transactions that aggregate to be over \$10,000 in a single day. These transactions are reported on Currency Transaction Reports (CTRs). The federal law requiring these reports was passed to safeguard the financial industry from threats posed by money laundering and other financial crime. To comply with this law, financial institutions must obtain personal identification information about the individual conducting the transaction such as a Social Security number as well as a driver's license or other government issued document. (Source: Financial Crimes Enforcement Network "Notice to Customers: A CTR Reference Guide," at <https://www.fincen.gov/sites/default/files/shared/CTRPamphlet.pdf>, accessed on 11 September 2020)

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for redemption, seeking one that did not require him to provide his Social Security Number. After the third attempt, ██████████ informed cage personnel that he would distribute the casino chips among friends to redeem on his behalf. [Analyst's Note: ██████████

██████████
██████████
██████████
██████████²⁶

- (U) On 23 May 2018, AMMC reportedly received its first disbursement from the Trump campaign, \$14,861.66 for research consulting, according to FEC disbursements data.²⁷
- (U//FOUO) On 25 – 27 May 2018, ██████████ gambled at MGM National Harbor, for an aggregate total of \$15,200 in chip redemptions, according to sensitive financial information.²⁸
- (U) On 12 June 2018 and 14 June 2018, AMMC reportedly received an aggregate total of \$45,429.20 in disbursements from the Trump campaign for digital consulting and online advertising, according to FEC disbursements data.²⁹
- (U//FOUO) On 25 June 2018, ██████████ withdrew \$14,923 from an account at Gemini Trust Company, a virtual currency exchange, ██████████
██████████.³⁰

(U//FOUO) In 2018 and 2019, as AMMC continued to receive campaign funds, ██████████ continued to gamble at casinos.

- (U) From 26 June 2018 to 8 September 2019, AMMC reportedly received 126 disbursements totaling \$17,735,841.42 from the Trump campaign, according to FEC disbursement data.³¹
- (U) From 26 June 2018 to 8 September 2019, AMMC reportedly received 39 disbursements totaling \$892,301.72 from the Trump Make America Great Again Committee, according to FEC disbursement data.³²
- (U//FOUO) From 26 June 2018 to 8 September 2019, ██████████ gambled at a casino on at least five dates. [Analyst's Note: Any additional dates when ██████████ gambled at casinos in amounts less than \$10,000 would not have been captured, due to the nature of the reporting.]
 - (U//FOUO) On 8 September 2019, ██████████ gambled at Westgate Las Vegas Resort and Casino, where he received a \$12,300 payment on a wager, ██████████
██████████.³³
 - (U//FOUO) On 4 February 2019, ██████████ gambled at The Cosmopolitan of Las Vegas, where he redeemed \$19,000 in casino chips or other gaming instruments, ██████████.³⁴
 - (U//FOUO) On 29 January 2019, ██████████ gambled at MGM National Harbor, where he purchased \$10,100 in casino chips or other gaming instruments, ██████████.³⁵
 - (U//FOUO) On 29 December 2018, ██████████ gambled at Maryland Live Casino, where he purchased \$13,700 in casino chips or other gaming instruments and redeemed \$9,000 in casino chips or other gaming instruments, ██████████
██████████.³⁶

- (U//FOUO) On 31 July 2018, ██████████ gambled at The Cosmopolitan of Las Vegas, where he redeemed \$12,000 in casino chips or other gaming instruments, ██████████.³⁷

(U//FOUO) Campaign ██████████ Likely Used Campaign Funds to Pay a Former Senegalese Government Official for Unknown Reasons

(U//FOUO) FBI Washington Field Office assesses ██████████ likely used Trump campaign funds to pay ██████████, a former Senegalese government official, for unknown reasons. This assessment is based on the close timing of AMMC's receipt of campaign funds for SMS advertising and a large wire from ██████████ to ██████████. Additionally, ██████████ companies did not appear to be renting office space from ██████████, therefore monthly payments were for unknown reasons.

- (U//FOUO) From 4 November 2019 to 6 December 2019, AMMC reportedly received four disbursements containing "SMS" in their description, totaling \$3,080,943.64, from the Trump campaign and the Trump Make America Great Again Committee. Of note, the 4 November 2019 disbursement was the round dollar amount of \$1,000,000.³⁸ [*Analyst's Note:* In accordance with a prior assessment made by this Tactical Intelligence Report (TIR), ██████████ was likely the ultimate recipient of these four disbursements for SMS advertising. These four disbursements were flagged due to their close timing to the following wire.]
- (U//FOUO) On 5 December 2019, Realtime Media, LLC sent a \$474,311 wire to ██████████ ██████████. The originator's address was ██████████ home address in ██████████. Five days later the wire was recalled.³⁹
- (U//FOUO) From May 2019 to at least January 2020, Realtime Media, LLC sent a monthly \$5,701 direct deposit to ██████████, presumed to be rent, ██████████ ██████████.⁴⁰ However, ██████████ companies did not appear to be renting office space from ██████████
 - (U) The principal office address for both Realtime Media, LLC and Opn Sesame is 1300 17th ST N, Suite 540, Arlington, VA, 22209, according to the Virginia business entity database.^{41, 42} The building is owned by real estate company WashREIT, according to LexisNexis Accurint⁴³ and the company's website.⁴⁴
 - (U//FOUO) ██████████ has owned his ██████████ residence since 2009, according to LexisNexis Accurint.⁴⁵
- (U//FOUO) ██████████ is referenced in FBI New York Field Office full investigation 205A-NY ██████████, opened on 28 August 2019, regarding violations of the Foreign Corrupt Practices Act. ██████████, owner of several oil and gas companies, allegedly made payments to the brother of the Senegalese president and others in the Senegalese government related to the awarding and transferring of two natural gas fields off the coast of Senegal.⁴⁶ ██████████ served as Senegal's Mister of ██████████ ██████████ from 2014 to 2017 and then served as Senegal's Minister of ██████████ ██████████ from 2017 to 2019, according to a TIR for the FBI New York Field Office full

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investigation. Businesses affiliated with ██████████ made five wire transfers totaling \$312,857.28 to ██████████ from 2011 to 2014. ██████████ owns three properties in the Washington, DC area and periodically resides in Potomac, Maryland.⁴⁷

(U) Analysis of Alternatives

(U//FOUO) FBI Washington Field Office considered the alternative hypothesis that the use of AMMC as a clearinghouse for Trump campaign spending is unlikely vulnerable to campaign finance crimes by campaign-connected sub-vendors. Such an assessment could take into consideration that during the 2012 election cycle a similar in-house firm was used for advertising purchased by Romney for President Inc. FBI Washington Field Office discounted the alternative hypothesis because of the lack of transparency created by the layering of campaign spending through AMMC combined with ██████████ holding roles in both the Trump campaign itself and companies performing work on behalf of the Trump campaign.

(U//FOUO) FBI Washington Field Office also considered the alternative hypothesis that ██████████ ██████████ for the Trump campaign and owner/operator of ██████████ and ██████████, was unlikely an ultimate recipient of Trump campaign disbursements made through AMMC. Such an assessment could take into consideration that FEC disbursement data indicated Opn Sesame worked for several political committees other than the Trump campaign, suggesting the Trump campaign was not a customer. FBI Washington Field Office discounted the alternative hypothesis because of forms filed by AMMC with the FCC and a statement by the Trump campaign's manager on the utilization of text messages.

(U//FOUO) FBI Washington Field Office also considered the alternative hypothesis that ██████████ ██████████ unlikely used Trump campaign funds disbursed through AMMC for personal or unauthorized use, specifically to gamble at casinos and to pay a former Senegalese government official for unknown reasons. Such an assessment could take into consideration that ██████████ may have gambled with earned income. FBI Washington Field Office discounted the alternative hypothesis because ██████████ did not gamble in amounts reaching \$10,000 prior to the formation of AMMC. ██████████ sought to evade the CTR reporting requirement the first time he reached the threshold at a casino. Additionally, ██████████, through Realtime Media, paid ██████████ for unknown reasons that appear unrelated to office rent.

(U) Investigative/Intelligence Gaps

- (U//FOUO) Gap 1: How much has AMMC paid Realtime Media, LLC and Opn Sesame, and for what work?
- (U//FOUO) Gap 2: What is the complete picture of ██████████ gambling at casinos, including instances he gambled in amounts less than \$10,000?
- (U//FOUO) Gap 3: To what bank account(s) are the funds ██████████ gambled at casinos with traced back to?
- (U//FOUO) Gap 4: For what reason did ██████████, through Realtime Media, pay a monthly direct deposit to ██████████?
- (U//FOUO) Gap 5: For what reason did ██████████, through Realtime Media, send and then recall a \$474,311 wire to ██████████

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(U) Scope Note

(U) Information in this TIR was derived from OGA records, FBI records, and on-line services and resources, therefore additional investigative methods may increase confidence levels or change the assessments.

(U) Consumers: SSA [REDACTED]
SSA [REDACTED]
SA [REDACTED]
SA [REDACTED]
SA [REDACTED]
IA [REDACTED]
SOS [REDACTED]

(U) Approval: A/SIA [REDACTED]

(U) FBI Washington Field Office, Squad ID [REDACTED], prepared this TIR. Please address comments and queries to the FBI Washington Field Office Intelligence Program Coordinator at 1-202-278-2000.