

# DIGITAL POLITICAL AD ARCHIVES

Fair Political Practices Commission

Digital Transparency Task Force

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Campaign Legal Center

April 23, 2020



# Digital gaps in federal campaign finance law

- ▶ **Media-specific laws:** federal electioneering communication disclosure only applies to “broadcast, cable, or satellite communications;” FCC “political ad file” requirements only apply to broadcast.
- ▶ **Narrow content triggers for disclosure:** for non-political committees, only report digital ads that expressly advocate.
- ▶ **Regulatory inaction:** FEC has failed to clarify disclaimer requirements for digital ads.
- ▶ **Microtargeting & digital “dark” ads:** digital ads have often been visible only to targeted recipients.



# Digital disclosure has three elements

- ▶ **Disclaimers:** Clarify application of on-ad “paid for by” messages to digital ads.
- ▶ **Disclosure:** Extend existing disclosure requirements to digital ads.
- ▶ **Political ad archive:** Create publicly-available archive of digital political ads—but housed with platforms, or with a government agency? What information must be included in the archive?



# Post-2016 Federal Efforts Falter

- ▶ **Honest Ads Act: bipartisan bill, endorsed by major platforms**
  - ▶ First introduced in 2017, included in H.R. 1 in 2019
  - ▶ Addresses the most glaring loopholes for digital election ads; requires large platforms (50M+ unique monthly visitors) to themselves create publicly-available political ad archives
  - ▶ Passage seems unlikely anytime soon
- ▶ **Continued FEC inaction**
  - ▶ FEC reopened its rulemaking on digital ad disclaimers—pending since 2011!—and held hearings in June 2018
  - ▶ No FEC action since those hearings; FEC now lacks a quorum



# State Action on Digital Ads

- ▶ **Some states have moved to strengthen transparency around digital election ads after 2016**
- ▶ **Ensuring disclosure laws apply to digital election ads**
  - ▶ In 2018, Washington’s legislature amended state law to include “digital communications” in definitions of “electioneering communication” & “political advertising”
- ▶ **Addressing “dark” ads: public archives of digital election ads**
  - ▶ Publicly accessible & searchable databases of digital ad records
  - ▶ California, Maryland, & New York passed archive legislation in 2018
  - ▶ A few states & localities have longstanding public record & access requirements for election-related ads (e.g., Washington’s requirements for “commercial advertisers”)



# Who Maintains the Archive?

- ▶ **State election agency maintains (New York State, NYC, LA)**
  - ▶ Advertisers file digital ad copies & info with state election officials, who upload to government-hosted archive
  - ▶ Platforms must help advertisers comply but do not have to create their own ad archives
  - ▶ Centralizes location of information about digital election ads, and ensures public access to that info
- ▶ **Online platforms maintain (Honest Ads Act, Maryland)**
  - ▶ Each “online platform” creates & manages its own public archive of digital election ads sold by the platform
  - ▶ Platform collects & uploads info to its archive after ad is purchased
  - ▶ *Washington Post v. McManus* (4th Cir. 2019)

# Which Platforms Are Covered?

- ▶ **If state maintains the ad archive, “online platform” definition is less significant; applies primarily to platform recordkeeping requirements**
- ▶ **Qualification threshold is relevant if platforms maintain ad archives**
  - ▶ Common metric is average monthly U.S. visitors to website
  - ▶ Revenue generated from political ad sales is another option
- ▶ **Existing legislation uses different thresholds for “online platform”**
  - ▶ High: Honest Ads Act ( $\geq$  avg. 50,000,000 U.S. monthly visitors); NY ( $\geq$  70,000,000 monthly U.S. visitors)
  - ▶ Low: Maryland ( $\geq$  avg. 100,000 monthly U.S. visitors); California: any website or application that sells political ads “directly” to advertisers



# What Ads & Info Are in Archive?

- ▶ **Comprehensive availability of election-related ads in archive provides more info to public, aids in enforcement, & helps to prevent digital “dark” ads**
- ▶ **Who is the intended audience: how user-friendly must the archive be?**
- ▶ **Existing legislation varies in coverage of digital election ads**
  - ▶ Honest Ads Act: “qualified political advertisement” includes any digital ad relating to a candidate, federal election, or “national legislative issue of public importance”
  - ▶ NY’s 2018 law only applies to digital independent expenditures





# Platform-managed archives: what is a “political ad?”

- ▶ Facebook/Instagram: Ads that reference candidates, political parties, elections, ballot measures, or 10 broad “social issues”
- ▶ Google (YouTube, search ads, display ads): ads that reference federal or state candidates, officeholders, or political parties, or qualified state ballot measures. Exemption for media and commerce.
  - ▶ No ads from Washington, Maryland, New Jersey, Nevada, and New York.
- ▶ Snapchat: Ads about candidates or parties, ballot measures, or voting, Or “Issue or advocacy” i.e. “ads concerning issues or organizations that are the subject of debate on a local, national, or global level, or of public importance. They include ads about abortion, immigration, the environment, education, discrimination, and guns.”



# What Ads & Info Are in Archive?

- ▶ What information is available for each ad in the archive?
- ▶ Comprehensive record of each digital ad, including:
  - ▶ Copy of advertisement
  - ▶ Identity of advertiser
  - ▶ Amount paid
  - ▶ Dates of distribution
  - ▶ Target audience
  - ▶ Number of recipients
  - ▶ Info about candidate/ballot question/ election referenced by ad



🔍 All Ads

🏛️ Issue, Electoral or Political

🏠 Housing

donald



**Page name contains donald**



Donald J. Trump

📘 @DonaldTrump · 27.3M likes · Political Candidate ✓



McDonald's

📘 @McDonalds · 80.6M likes · Burger Restaurant ✓

📷 @mcdonalds · 3.8M followers ✓



McDonald's

📘 @McDonaldsBrasil · 80.6M likes · Burger Restaurant · Brazil ✓

📷 @mcdonalds\_br · 2.6M followers ✓




McDonald's

📘 @McThai · 80.6M likes · Burger Restaurant · Thailand ✓

📷 @mcdonaldsthailand · 66.7K followers ✓

[More results by Page →](#)

All Ads Donald J. Trump DESTINY



**Donald J. Trump**  
 @DonaldTrump  
 27,348,250 likes • Political Candidate

**Page transparency** [See More](#)

- Page created **Apr 7, 2009**
- Page name has not changed
- Primary country/region location for people who manage this Page includes: **United States (19), Bonaire, Sint Eustatius and Saba (1)**

**Total spent by Page on ads about social issues, elections or politics**

May 2018 - Apr 20, 2020  
United States

**\$36,595,191**  
[See spend details](#)

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**Recently spent by Page on ads about social issues, elections or politics**

7 days • Apr 14 - Apr 20, 2020  
United States

**\$810,548**  
[See spend details](#)


>50,000 results  
 Showing ads from Donald J. Trump.

View: [All Ads](#) [Issue, Electoral or Political](#)

Filter By: [United States](#) [Active and Inactive](#) [Impressions by Recency](#) [Platform](#) [Sort by](#)

Launched April 2020


188 Active  
 Started running on Apr 23, 2020  
 ID: 296763341307676

Special ad category: 


**Donald J. Trump**  
 Sponsored • Paid for by TRUMP MAKE AMERICA GREAT AGAIN COMMITTEE

Our First Lady has been nothing short of incredible, and we want to make sure she knows that President Trump's supporters are her supporters too.

This is the First Lady's ONLY Official Birthday Card, and when you sign your name, you can even leave a personal note for her to read. We know she'll love it....




376 Active  
 Started running on Apr 23, 2020  
 ID: 306141760354691

Special ad category: 


**Donald J. Trump**  
 Sponsored • Paid for by TRUMP MAKE AMERICA GREAT AGAIN COMMITTEE

Our First Lady has been nothing short of incredible, and we want to make sure she knows that President Trump's supporters are her supporters too.

This is the First Lady's ONLY Official Birthday Card, and when you sign your name, you can even leave a personal note for her to read. We know she'll love it....

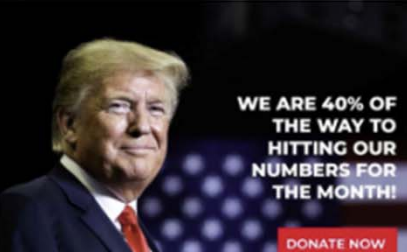


37 Active  
 Started running on Apr 23, 2020  
 ID: 288419075487371

Special ad category: 

**Donald J. Trump**  
 Sponsored • Paid for by DONALD J. TRUMP FOR PRESIDENT, INC.

Our campaign has set a HIGH fundraising goal for the month of April. I know with YOUR help we can rise to the challenge. Let's crush our goal!




Multiple versions of this ad 1 of 37

**Donald J. Trump**  
 Sponsored • Paid for by DONALD J. TRUMP FOR PRESIDENT, INC.  
 ID: 288419075487371

Our campaign has set a HIGH fundraising goal for the month of April. I know with YOUR help we can rise to the challenge. Let's crush our goal!

★ ★ ★ PAID FOR BY DONALD J. TRUMP FOR PRESIDENT, INC. ★ ★ ★

We are ONLY 40% of the way there!  
 DONATE NOW>>> Learn More

[WWW.DONALDJTRUMP.COM/DONATE](http://WWW.DONALDJTRUMP.COM/DONATE)

**About the disclaimer**  
 When an advertiser categorizes their ad as being about social issues, elections or politics, they are required to disclose who paid for the ad. [Learn More](#)

**Information from the advertiser**

**Data About This Ad**  
 This data only updates as long as the ad is active

- Active**  
 Started running on Apr 23, 2020  
 ID: 288419075487371
- Amount spent (USD): <\$100**
- Potential Reach: >1M people**
- Impressions: <1K**

**Who Was Shown This Ad**  
 These values are estimated.

**Age and Gender**

Age Group	Men	Women	Unknown
18-24	5%	2%	0%
25-34	22%	14%	0%
35-44	13%	15%	0%
45-54	6%	7%	0%
55-64	4%	6%	0%
65+	1%	4%	0%

**Where This Ad Was Shown**



# Facebook Ad Library Report

United States

Explore, filter and download data for ads about social issues, elections or politics. See overall spending totals, spending by specific advertisers and spend data by geographic location.

This publicly accessible report is part of Facebook's efforts to increase transparency in advertising.



## Ad Library totals

Includes ads about social issues, elections or politics (since May 2018)

Total number of ads in the Ad Library

7,608,682

Total amount spent

\$1,280,435,841



# Facebook's downloadable CSV:

AutoSave OFF | FacebookAdLibraryReport\_2020-04-20\_US\_yesterday\_advertisers

Home Insert Draw Page Layout Formulas Data Review View Tell me

G10

	A	B	C	D	E	F
	Page ID	Page Name	Disclaimer	Amount Spent (USD)	Number of Ads in Library	
2	2.0263E+11	U.S. Census Bureau	U.S. Census Bureau	260588	792	
3	1.5308E+11	Donald J. Trump	TRUMP MAKE AMERICA GREAT AGAIN COMMITTEE	67699	3462	
4	1.5697E+14	Stop Republicans	Stop Republicans	61750	196	
5	7860876103	Joe Biden	BIDEN FOR PRESIDENT	60182	661	
6	7976226799	The Daily Show	Comedy Central	44688	66	
7	1.0136E+14	Cost of Chaos	Priorities USA Action. 202-455-8428. Not authorized by any candidate or candidate's cor	41402	348	
8	6726182861	Mike Pence	TRUMP MAKE AMERICA GREAT AGAIN COMMITTEE	38114	263	
9	1.7115E+15	Nancy Pelosi	NANCY PELOSI FOR CONGRESS	36172	106	
10	1.0616E+14	Facts First	Priorities USA Action. 202-455-8428. Not authorized by any candidate or candidate's cor	31328	450	
11	9.6935E+10	Democratic Governors Association (DGA)	Democratic Governors Association	24427	353	
12	3.3111E+10	Doctors Without Borders/ Médecins Sans Frontières (MSF)	Doctors Without Borders/Médecins Sans Frontières (MSF)	23453	445	
13	1.5308E+11	Donald J. Trump	DONALD J. TRUMP FOR PRESIDENT, INC.	22173	700	
14	9.4999E+10	California Department of Public Health	California Department of Public Health	17906	38	
15	1.2139E+11	Goldman Sachs	Goldman Sachs & Co.	17541	24	
16	1.0461E+10	Ben & Jerry's	BEN & JERRY'S HOMEMADE, INC.	16617	20	
17	1.3164E+15	Alexandria Ocasio-Cortez	ALEXANDRIA OCASIO-CORTEZ FOR CONGRESS	15626	546	
18	2.1597E+11	AFT - American Federation of Teachers	American Federation of Teachers	15205	26	
19	1.0162E+14	Nancy Pelosi Elects Democrats	PAC TO THE FUTURE	14868	161	
20	9324910069	NRSC	NRSC	14078	120	
21	7.3971E+10	International Rescue Committee	International Rescue Committee	12006	51	
22	2.4208E+14	The Presidential Coalition	The Presidential Coalition	11966	90	
23	1.0118E+14	Four Is Enough	PACRONYM	11881	70	
24	2.0662E+14	NYC Department of Health and Mental Hygiene	New York City Department of Health and Mental Hygiene	11777	42	
25	1.4495E+15	4Patriots	4Patriots LLC	11774	48	
26	1.1131E+10	truth	TRUTH INITIATIVE FOUNDATION	11584	168	
27	1.7276E+14	PhRMA	PHARMACEUTICAL RESEARCH AND MANUFACTURERS OF AMERICA	11563	126	
28	1.1439E+14	AZ Census 2020	AZ Census 2020	11548	83	
29	1.0271E+14	Hablemos Claro USA	Priorities USA	10460	265	
30	1.2723E+14	PragerU	PragerU	10438	270	
31	2.2878E+10	Earth Day Network	EARTH DAY NETWORK INC	9816	184	



# Google's political ad archive

☰ Google Transparency Report

Overview EU and UK India United States

## Political advertising in the United States

Our goal is to provide greater transparency in political advertising on Google, YouTube, and partner properties. To run election ads, we require advertisers to be verified, and observe our policies and applicable laws. Election ads in this report feature a current officeholder or candidate for an elected federal or state office, federal or state political party, or state ballot measure, initiative, or proposition that qualifies for the ballot in a state. The report also includes all ads from advertisers that completed the express notification process related to California candidates for elected office or California ballot measures.

Updated Apr 23, 2020

Ads since May 31, 2018

307,266

Ad spend since May 31, 2018

\$241,343,200

CLC  
ADVANCING  
DEMOCRACY  
THROUGH LAW



## View ads

Search by candidate or advertiser



Start 5/31/2018

End 4/23/2020

Amount Spent **All** Impressions **Any** Format **All**

Sort **Most recent**

<p><b>Do You Rely On Obamac...</b>  <a href="http://therealcostofliving.org">therealcostofliving.org</a> As coronavirus threatens the c...</p>	<p><b>Do You Rely on Medicaid...</b>  <a href="http://therealcostofliving.org">therealcostofliving.org</a> Trump's budget calls for nearly ...</p>	<p><b>Max Rose for NY-11   Join...</b>  <a href="http://act.myngp.com/max_rose">act.myngp.com/max_rose</a> Max is running to continue serv...</p>	<p><b>Paying Too Much for Rx ...</b>  <a href="http://therealcostofliving.org">therealcostofliving.org</a> Some drug prices increased by ...</p>
<p>Paid for by <b>PRIORITIES USA ACTION</b> 4/19/20 - 4/19/20 (1 day)</p>	<p>Paid for by <b>PRIORITIES USA ACTION</b> 4/19/20 - 4/19/20 (1 day)</p>	<p>Paid for by <b>MAX ROSE FOR CONGRESS</b> 4/19/20 - 4/19/20 (1 day)</p>	<p>Paid for by <b>PRIORITIES USA ACTION</b> 4/19/20 - 4/19/20 (1 day)</p>
<p> ≤ 10k  ≤ \$100</p>	<p> ≤ 10k  ≤ \$100</p>	<p> ≤ 10k  ≤ \$100</p>	<p> ≤ 10k  ≤ \$100</p>



View ads

Start 5/31/2018

End 4/23/2020

Amount Spent All Impressions Any Format All

Sort Most recent

<p><b>Stand With Trump   Donat...</b>  secure.winred.com/contrib... President Donald Trump Needs...</p>	<p><b>Give To President Donald...</b>  secure.winred.com/contrib... President Donald Trump Needs...</p>	<p><b>Give To Team Trump   Su...</b>  secure.winred.com/contrib... Let's Keep America Great. Re...</p>	<p><b>Give To Team Trump   Su...</b>  secure.winred.com/contrib... Let's Keep America Great. Re...</p>
<p>Paid for by <b>DONALD J. TRUMP FOR PRESI...</b> 4/19/20 - 4/19/20 (1 day)</p>	<p>Paid for by <b>DONALD J. TRUMP FOR PRESI...</b> 4/19/20 - 4/19/20 (1 day)</p>	<p>Paid for by <b>DONALD J. TRUMP FOR PRESI...</b> 4/18/20 - 4/18/20 (1 day)</p>	<p>Paid for by <b>DONALD J. TRUMP FOR PRESI...</b> 4/18/20 - 4/18/20 (1 day)</p>
<p> ≤ 10k  ≤ \$100</p>	<p> ≤ 10k  ≤ \$100</p>	<p> ≤ 10k  ≤ \$100</p>	<p> ≤ 10k  ≤ \$100</p>
<p><b>Support President Donald...</b>  secure.winred.com/contrib... Help Keep America Great. Re...</p>	<p>Ad preview unavailable</p>	<p>Ad preview unavailable</p>	<p>Ad preview unavailable</p>
<p>Paid for by <b>DONALD J. TRUMP FOR PRESI...</b> 4/17/20 - 4/18/20 (2 days)</p>	<p>Paid for by <b>DONALD J. TRUMP FOR PRESI...</b> 4/16/20 - 4/19/20 (4 days)</p>	<p>Paid for by <b>DONALD J. TRUMP FOR PRESI...</b> 4/16/20 - 4/19/20 (4 days)</p>	<p>Paid for by <b>DONALD J. TRUMP FOR PRESI...</b> 4/16/20 - 4/19/20 (4 days)</p>
<p> ≤ 10k  ≤ \$100</p>	<p> 10k-100k  \$1k-\$50k</p>	<p> 10k-100k  \$100-\$1k</p>	<p> 10k-100k  \$100-\$1k</p>

# Ad by DONALD J. TRUMP FOR PRESIDENT, INC.

Ran for 4 days First served Apr 16, 2020, 5:00 PM EDT Last served Apr 20, 2020, 5:00 AM EDT

View more ads from [DONALD J. TRUMP FOR PRESIDENT, INC.](#)



Amount spent	Impressions	Format
\$1k-\$50k	10k-100k	Video

Data in the Political Advertising Transparency Report is cumulative based on the launch date for a country or region. This data is updated weekly.

[Download data \(CSV\)](#)

# Google's downloadable CSV:

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R
1	Advertiser_ID	Advertiser_N	Public_IDs_L	Regions	Elections	Total_Creati	Spend_USD	Spend_EUR	Spend_INR	Spend_BGN	Spend_HRK	Spend_CZK	Spend_DKK	Spend_HUF	Spend_PLN	Spend RON	Spend_SEK	Spend_GBP
2	AR10020729	FRIENDS OF	EIN ID 46-39	US	US-Federal	1	100	100	9000	200	800	3000	1000	37500	500	525	750	100
3	AR10029319	DYLAN BILLI	FEC ID C0071	US	US-Federal	1	100	50	3750	100	300	1000	500	15000	200	225	750	50
4	AR10057920	ARCHERD FC	FEC ID C0073	US	US-Federal	3	1400	1250	98000	2450	9300	31000	9500	420000	5300	6000	13500	1050
5	AR10060929	PS:Digital, s.r.o.		AT, CZ, EU, S	EU-Parliame	55	3300	3050	237250	5950	22700	77000	22500	1027500	13100	14625	32250	2550
6	AR10083896	SECURING LI	EIN ID 83-27	US	US-Federal	73	78800	69700	5563750	136350	516700	1790000	520500	22417500	299900	329925	731250	61750
7	AR10099674	FreedomWo	EIN ID 52-13	US	US-Federal	264	106100	94500	7516000	184825	702300	2426000	705500	31012500	406700	447525	1000500	82500
8	AR10112180	PETE FOR AN	FEC ID C0065	US	US-Federal	3926	7130100	6437800	505992250	12591250	47864100	163763000	48089500	2137440000	27567600	30684375	68319750	5545200
9	AR10114847	DOUG WAR	EIN ID 82-07	US	US-Federal	12	12400	10800	895500	21125	80300	279000	80500	3495000	46500	50400	111750	9550
10	AR10118310	Fianna Fv"il		DK, EU, GB, I	EU-Parliame	237	53500	48400	3802500	94625	360200	1221000	361500	16230000	207000	230775	513750	41200
11	AR10120963	VAN DREW F	FEC ID C0066	US	US-Federal	2	6200	5600	441250	10925	41600	142000	41500	1845000	23800	26625	58500	4750
12	AR10136947	CITIZENS FO	FEC ID C0067	US	US-Federal	11	1200	1050	87750	2050	7800	27000	8000	337500	4500	4875	11250	900
13	AR10142774	FINANCE CO	FEC ID C0066	US	US-Federal	4	1700	1500	125250	2975	11300	39000	11500	487500	6500	7050	15750	1350
14	AR10148725	MANUEL E L	LOSAS	US	US-Federal	2	300	250	18750	450	1700	6000	2000	75000	1000	1125	2250	200
15	AR10212263	MCCONNELL	FEC ID C0015	US	US-Federal	75	440300	399000	31789000	780400	2983000	10321000	2980000	134865000	1734400	1908300	4271250	349050
16	AR10263624	JESSICA TAYI	EIN ID 84-32	US	US-Federal	27	2600	2350	187500	4600	17600	60000	17500	787500	10100	11250	24750	2000
17	AR10263817	HILLARY O'G	FEC ID C0072	US	US-Federal	10	0	0	250	0	0	0	0	0	0	0	0	0
18	AR10309213	NEOS Rathausklub		AT, EU	EU-Parliame	31	20800	18650	1461000	36500	138200	478000	139500	6127500	80200	88575	198000	16600
19	AR10313281	MISSISSIPPI	FEC ID C0008	US	US-Federal	6	12200	10950	856500	21425	81300	281000	82000	3607500	47000	51975	117000	9650
20	AR10320112	LANDRIC A. ,	Registered ir	US	US-Federal	4	2700	2450	197250	4800	18300	62000	18500	825000	10600	11775	26250	2100
21	AR10337800	STUCK FOR (	EIN ID 84-22	US	US-Federal	9	400	400	31750	800	3000	10000	3000	135000	1700	1950	4500	350
22	AR10383911	ARNOLD FO	FEC ID C0070	US	US-Federal	24	10500	9450	747000	18500	70400	242000	70500	3127500	40500	45000	102000	8150
23	AR10392858	PACIFIC CAM	EIN ID 82-53	US	US-Federal	12	500	400	33500	825	3100	11000	3000	135000	1800	2025	4500	350
24	AR10402809	FRIENDS OF	FEC ID C0057	US	US-Federal	5	45200	39650	3315500	77525	294500	1024000	295500	12817500	170800	184800	410250	35000
25	AR10412966	FW Niederösterreich		AT, EU	EU-Parliame	9	200	150	12250	300	1200	4000	1000	52500	700	750	1500	150
26	AR10437443	KAMALA HAF	FEC ID C0057	US	US-Federal	28	6400	5500	454750	10800	41000	142000	41000	1785000	23700	25650	57000	4950
27	AR10476614	Vvšnssterpartiet		EU, SE	EU-Parliame	14	15200	13550	1057750	26550	100800	350000	101500	4425000	58400	64650	145500	11950
28	AR10550033	DONALD J. T	FEC ID C0058	US	US-Federal	6456	6068200	5448050	431809750	10655775	40518400	139910000	40684000	1800930000	23494400	25846800	57708750	4784600

# Snapchat's political ad archive:

snap.com/en-US/political-ads

## Snap Political Ads Library



### Trust. It's what makes it 'Real'

At Snap we strive to create a safe, transparent, and trusted platform for our users. Our Political and Advocacy Ads Library is one of the many efforts we've taken in doing that. This gives the public an opportunity to find out details about all political and advocacy advertising running on our platform.

### Archives

[2018](#)

[2019](#)

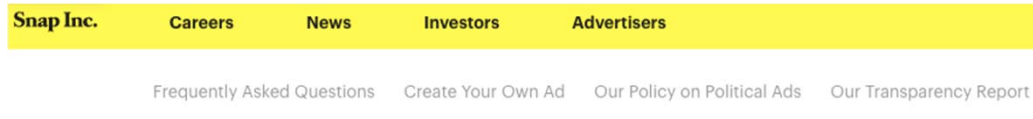
[2020](#)

# Snapchat's downloadable CSV:

	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P
1	CreativeUrl	Currency Cod Spend	Impressions	StartDate	EndDate	Organization	BillingAddr:	CandidateBa	PayingAdvert	Gender	AgeBracket	CountryCode:	Regions (Incl	Regions (Exc	
2	https://www.snap.com/political-ads/asset/d1bdf9f9	USD	162	37708	2020/01/30	2020/02/11	BCom Soluti	919 Central Ave,Auburn,6	Great Schools for Great Ki		18+	united states			
3	https://www.snap.com/political-ads/asset/060fa3c	USD	256	51173	2020/01/31	2020/02/04	Power Up for US		American Wind Energy Association			united states			
4	https://www.snap.com/political-ads/asset/2c8912f	USD	5	3160	2020/01/23	2020/02/04	Rising Tide for	1250 H St. N	Voto Latino		18-35	united states	Texas		
5	https://www.snap.com/political-ads/asset/d0788b	USD	0	451	2020/02/20	08:01:13Z	D-Squared Commerce		D-Squared Commerce, LLC		35-	united states			
6	https://www.snap.com/political-ads/asset/8ff5f23	USD	506	209772	2020/01/03	2020/02/12	Pete for America	202 S Michig	Pete for America		17+	united states	New Hampshire		
7	https://www.snap.com/political-ads/asset/7dcae8f	USD	207	85876	2020/01/28	2020/03/16	Media Link, Inc	1902 17th Street,Rock Isla	Rock Island County clerk		17+	united states			
8	https://www.snap.com/political-ads/asset/0357ae	USD	17886	1851920	2020/02/22	2020/03/03	Hawkfish LLC	909 Third Av	Mike Bloomberg 2020, Inc		24-38	united states	Alabama,California,Colora		
9	https://www.snap.com/political-ads/asset/01e4c4	USD	93	62018	2020/02/03	18:59:30Z	Warren for P	90 Cambridg	Warren for P	Warren for President	18+	united states		New Hampsh	
10	https://www.snap.com/political-ads/asset/677a5d	USD	6000	5902786	2020/02/11	2020/02/17	Chong and Ki	1640 Rhode Island Ave. N	National Wo	FEMALE	15-34	united states			
11	https://www.snap.com/political-ads/asset/5477ef	USD	15	16521	2020/01/19	2020/01/26	SADEARTH	US	SADEARTH			united states			
12	https://www.snap.com/political-ads/asset/a26f43	USD	4	4239	2020/04/08	2020/06/15	Blueprint Int	1730 Rhode Island Ave NV	NILC Immigrant Justice Fu		16-30	united states	Arizona,Color		
13	https://www.snap.com/political-ads/asset/d6f318	USD	15	25171	2020/03/02	17:05:55Z	Greater Half	US	Greater Half		20+	united states			
14	https://www.snap.com/political-ads/asset/c4a8ad	USD	274	190467	2020/02/01	2020/03/01	Ciceron Inc	126 N. 3rd Street,Minneap	Be the Match		18-39	united states			
15	https://www.snap.com/political-ads/asset/6fe443	EUR	50	10658	2020/04/07	2020/04/24	DCMN GmbH	Boxhagener	Together For	Together For Future	30+	germany			
16	https://www.snap.com/political-ads/asset/14110d	USD	77	30658	2020/04/21	2020/04/27	Precision [TE	1121 14th Street NW Suit	Resources Legacy Fund		18+	united states			
17	https://www.snap.com/political-ads/asset/26cf34	EUR	4	7665	2020/01/17	12:31:02Z	SpunOut.ie	Sean McBride House, 48 F	SpunOut.ie		16-25	ireland	Dublin		
18	https://www.snap.com/political-ads/asset/bbe671	USD	248	77358	2020/02/09	2020/02/12	BCom Soluti	919 Central Ave,Auburn,6	Great Schools for Great Ki		18+	united states			
19	https://www.snap.com/political-ads/asset/67ae51	USD	25	5779	2020/04/17	2020/04/24	LoudDoor, LL	1 MONCKTON BLVD,Colun	Protect the Promise		35+	united states			
20	https://www.snap.com/political-ads/asset/1541bd	GBP	1978	288474	2020/01/15	2020/01/28	Opticomm	31 Old Nicho	Greenpeace	Greenpeace UK	25+	united kingdom			
21	https://www.snap.com/political-ads/asset/bf3065c	CAD	242	146158	2020/03/04	2020/03/16	DSA Media	Suite 110 ,A	20091 91A A	Elections Saskatchewan	18+	canada	Saskatchewan		
22	https://www.snap.com/political-ads/asset/c2251e	USD	189	90225	2020/03/26	2020/05/01	Panowatch, I	1000 New Je	2020 Census	United We Dream	18-34	united states	Arizona,California,Colorad		
23	https://www.snap.com/political-ads/asset/d70458	EUR	0	1507	2020/01/17	12:31:03Z	SpunOut.ie	Sean McBride House, 48 F	SpunOut.ie		16-25	ireland	Clare,Cork,Kerry,Limerick		
24	https://www.snap.com/political-ads/asset/8fc99e	USD	125	13346	2020/02/06	2020/03/04	Lockwood St	US	PACRONYM		18+	united states	North Carolina		
25	https://www.snap.com/political-ads/asset/1300a3	USD	150	59456	2020/02/04	2020/02/11	BCom Soluti	919 Central Ave,Auburn,6	Great Schools for Great Ki		18+	united states			
26	https://www.snap.com/political-ads/asset/505e83	USD	195	79510	2020/03/19	2020/03/31	Realtime Me	P.O. Box 134	Republican N	Republican National Comr	18+	united states	Arizona		



# Report links to Snapchat ad:



# As well as the URL linked to from the ad:

## WARREN

**ADD YOUR NAME IF  
YOU SUPPORT  
CANCELING  
STUDENT LOAN DEBT  
AND MAKING  
COLLEGE FREE**

Elizabeth's plan for universal free college would give every American the opportunity to attend a two-year or four-year public college without paying a dime in tuition or fees. And would cancel up to \$50,000 in student loan debt for 42 million Americans.

Email\*

Zip Code\*

**SIGN THE PETITION**

\* denotes required field



# Comparison of Platforms' Political Advertising Policies

Last updated 1/30/2020



Platform Tables\_webupdate\_Feb12020

	Facebook (including Instagram)	Google Adwords (including YouTube, search, display, and video)	Reddit	Snapchat	Twitter <a href="http://www.citapdigitalpolitics.com">www.citapdigitalpolitics.com</a>
<b>Definition of political advertising</b>	Both election-related and broader issue ads.	Ads that reference candidates, government office holders, political parties, or state ballot issues.	Both election-related and broader issue ads.	Both election-related and broader issue ads.	Twitter distinguishes political ads between political content, for which is banned, and cause-based content, which is restricted.
<b>Reaction to State Laws</b>	FB prohibits specific political ads from running in WA. No other states are restricted, but advertisers must follow all applicable state laws.	State and local or ballot measure advertising banned in MD, NV, NJ, or WA. Such ads can run in CA and NY but require additional forms.	Reddit "does not accept ads related to ballot measures or candidates for US state or local elections."	Snapchat does not ban political advertisements in any state according to its political ads policies.	No state or local election or ballot-measure ads are allowed because these would fall under political content.
<b>Relevant advertising policies</b>	Advertisers cannot exclude audiences based on demographic characteristics for discriminatory purposes, call out personal attributes in ads, and make sales pitches based on political issues. Generic statement that advertisers must follow all laws.	Google's ad policies prohibit inappropriate/derogatory content and misrepresentation. Political advertisers may not target ads based on race, sexuality, or religion. Generic statement that advertisers must follow all laws.	Reddit accepts election ads for national US elections. Political ads on Reddit require human review. Reddit reserves the right to reject ads as it sees fit, regardless of policies. Generic statement that advertisers must follow all laws.	Snapchat does not allow hate speech, harassment and bullying and bans misleading and deceptive content. Snapchat says they fact check all political ads. Generic statement that advertisers must follow all laws.	Twitter prohibits promotion of political content but allows cause-based ads. Twitter also prohibits hateful content and inappropriate content, which includes personal attacks, sensitive topics, and misrepresentative content. Generic statement that advertisers must follow all laws.
<b>Relevant community guidelines</b>	Primary relevant Facebook community standard regarding institutional politics is under "Coordinating Harm" which prohibits election interference, threatening election integrity, and voter suppression.	Bans "hateful content," "harassment or cyberbullying," threats, and voter suppression.	Prohibits of threats, harassment, or bullying and the posting of personal information.	Snapchat prohibits "Harassment & bullying" as well as "Hate Speech & False Information," which only bans false information that causes harm.	Relevant rules include the bans on "hateful conduct" and "abusive behavior." On the more directly-political front, Twitter specifies that no election interference is allowed on the platform.
<b>Labeling and disclaimer requirements</b>	Political ads are required to include a "paid for by" statement.	Political ads are required to include a "paid for by" statement.	Political ads are required to include a "paid for by" statement.	Political ads are required to include a "paid for by" statement.	Previously, political ads required a "paid for by" statement. It is unclear if cause-based ads also require this statement, though these advertisers must verify their identity
<b>Targeting restrictions specific to politics</b>	Political ads cannot be targeted Messenger or the FB Audience Network (FAN). There are no other restrictions on political advertisers regarding targeting capabilities.	Google only allows political ads to be targeted by age, gender, and general location as well as with contextual targeting related to the content that the ad appears next to.	None.	None.	Cause-based advertising cannot use geo-targeting more specific than "the state, province, or region level" and cannot target "political content, prohibited advertisers, or political leanings or affiliations."
<b>Content restrictions specific to politics</b>	None.	None.	None, although Reddit prohibits "content that depicts intolerant or overly contentious political or cultural topics or view" in all advertising.	Snapchat prohibits attacks relating to a person's personal life in political ads.	Cause-based advertising can't have the "primary goal of driving political, judicial, legislative, or regulatory outcomes" as this would make them "political content" which is banned in paid ads.
<b>Verification and authorization</b>	Advertisers must confirm identities through gov issued ID and a US address. Ads on behalf of an organizations must be verified through gov resources such as EIN number.	Advertisers must verify identity through a government issued ID, SSN, and address. To run ads through an organization, a Federal Election Commission ID or a federal EIN.	Political advertisements on Reddit "are subject to preapproval" although Reddit does not specify what is required.	Political ads on Snapchat require human review.	Cause-based advertisers must verify their name and country with a government issued ID; organizations' registration requires tax info or other government-issued organizational identification.
<b>Political ads library</b>	Yes	Yes	None.	Yes	Yes
<b>Exceptions for political figures</b>	Political figures are exempt from fact checks. This allows misinformation in their ads.	None	None	None.	None, since all ads by candidates and government officials are now banned.

# Case Study: Big Tent Project

- ▶ Big Tent Project reported spending around \$4.4 million on digital independent expenditures to the FEC described as “online/digital advertising.”
- ▶ Only 4 percent of its FEC-reported digital spending appeared in the archives maintained by the big platforms.



# Case Study: Big Tent Project

Facebook Ad Library interface showing the Big Tent Project page. The page is for 'Big Tent Project Fund' with ID: 112739086975178, 85 likes, and is a Political Organization. The page transparency section shows it was created on Feb 17, 2020, and its name has not changed. The primary country/region location for people who manage this Page includes: United States (2). The total spent by Page on ads about social issues, elections or politics is \$164,673, spanning from May 2018 to Apr 20, 2020, in the United States. The recently spent amount is \$0, spanning from Apr 14 to Apr 20, 2020, in the United States.

Category	Value
Total spent by Page on ads about social issues, elections or politics	\$164,673
Recently spent by Page on ads about social issues, elections or politics	\$0

# Case Study: Big Tent Project



**The Washington Post**  
*Democracy Dies in Darkness*

**Tech Policy**

## Political ads are flooding Hulu, Roku and other streaming services, revealing loopholes in federal election laws

With more Americans cutting the cord, watchdogs worry that voters lack a full understanding of who's trying to influence them

Source: <https://www.washingtonpost.com/technology/2020/02/20/hulu-roku-political-ads-streaming/>



# New CLC Report Highlights Digital Transparency Loopholes in the 2020 Elections



BY **BRENDAN FISCHER**

APRIL 8, 2020

Source: <https://campaignlegal.org/update/new-clc-report-highlights-digital-transparency-loopholes-2020-elections>

Report: <https://campaignlegal.org/sites/default/files/2020-04/04-07-20%20Digital%20Loopholes%20515pm%20.pdf>



# New York BOE-hosted archive

- ▶ Political committees and independent expenditure committees must file a copy of certain digital independent expenditures that reach over 50 people with the Board of Elections.
  - ▶ NY has a broader definition of “independent expenditures” than on the federal level
- ▶ Platforms do not have a responsibility to create archives under New York law, however:
  - ▶ Platforms with over 70M unique monthly users, and "third-party advertising vendors" that buy or sell ad space on other websites with over 30M unique monthly visitors, must verify that an advertiser is properly registered with the BOE.



# New York's BOE-hosted archive

- ▶ Information provided (9 CRR-NY 6200.11):
  - ▶ (1) scripts for any paid internet or digital advertisement with an audio and/or video component which shall include a reasonable description of any visual elements;
  - ▶ (2) screenshots of any paid or digital advertisement without an audio and/or video component;
  - ▶ (3) for paid internet or digital advertisements without a video component that are dynamic, such as advertisements with animation, or interactive advertisements that change when a viewer views or interacts with the advertisement, each image in the advertisement.



# New York's BOE-hosted archive:



Services News Government Local

## Board of Elections

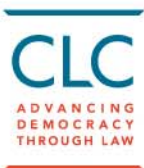
NYSBOE Home / Campaign Finance Home / Independent Expenditure Reporting / Independent Expenditure Committees

### Independent Expenditure Committees

Show 10 entries

Search:

Expand	Filer ID	Committee Name	Registration Information	Communication
	A01055	NEW YORK LEAGUE OF CONSERVATION VOTERS POLITICAL ACTION COMMITTEE	<a href="#">A01055 Registration (PDF 38.5 KB)</a>	
	A19567	WNY FREEDOM	<a href="#">A19567 Registration (PDF 37.2 KB)</a>	
	A22635	FIGHTING FOR OUR FUTURE	<a href="#">A22635 Registration (PDF 38.4 KB)</a>	<a href="#">A22635 Political Communication</a>
	A22646	FIGHT BACK BAY RIDGE	<a href="#">A22646 Registration (PDF 38.5 KB)</a>	
	A22665	NEW AMERICAN MAJORITY PROJECT, INC.	<a href="#">A22665 Registration (PDF 37.91 KB)</a>	
	A19729	CITIZENS UNION OF THE CITY OF NEW YORK	<a href="#">A19729 Registration (PDF 38.0 KB)</a>	
	A19813	NY2A VICTORY FUND	<a href="#">A19813 Registration (PDF 37.2 KB)</a>	
	A22676	NEW YORK HEALTH VOTERS	<a href="#">A22676 Registration (PDF 37.9 KB)</a>	







## Board of Elections

Independent Expenditure Committees / Political Communications for IE Committee

### Political Communications for A22635 - FIGHTING FOR OUR FUTURE

Show 10 entries

Search:

Action	Year	Office Type	County	Municipality	Election Type	Date Paid	Amount	Vendor/Payee Name
Communication	2018	State			General	09/28/2018	\$50000.00	Red Horse Strategies
Communication	2018	State			General	10/09/2018	\$50000.00	Red Horse Strategies
Communication	2018	State			General	09/28/2018	\$34081.33	Berlin Rosen, LTD
Communication	2018	State			General	10/11/2018	\$12991.71	Berlin Rosen, LTD
Communication	2018	State			General	10/26/2018	\$17500.00	Red Horse Strategies
Communication	2018	State			General	10/26/2018	\$14758.29	Berlin Rosen, LTD
Communication	2018	State			General	11/01/2018	\$15000.00	Red Horse Strategies
Communication	2018	State			General	11/01/2018	\$15000.00	Red Horse Strategies
Communication	2018	State			General	10/26/2018	\$47500.00	Red Horse Strategies
Communication	2018	State			General	11/01/2018	\$17500.00	Red Horse Strategies



**COPY:**

"John Mannion is one of us. He was born on the west side of Syracuse, he's raising his family here, and he wants to keep Central New York the kind of place that our kids and grandkids can stay and raise their families



**Fighting for our future**

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John Mannion is one of us. He was born on the west side of Syracuse, he's raising his family here, and he wants to keep Central New York the kind of place that our kids and grandkids can stay and raise their families.



Billie Hornick, Sue Nicholson Bingham and 4 others

Like

Comment

Share

# DIGITAL POLITICAL AD ARCHIVES

Fair Political Practices Commission

Digital Transparency Task Force

Brendan Fischer

Campaign Legal Center

April 23, 2020

