

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MAINE

NATIONAL ORGANIZATION FOR)
MARRIAGE and)
AMERICAN PRINCIPLES IN ACTION,)

Plaintiffs)

v.)

WALTER F. MCKEE, ET AL.)

Defendants.)

Civil No. 1:09-cv-00538

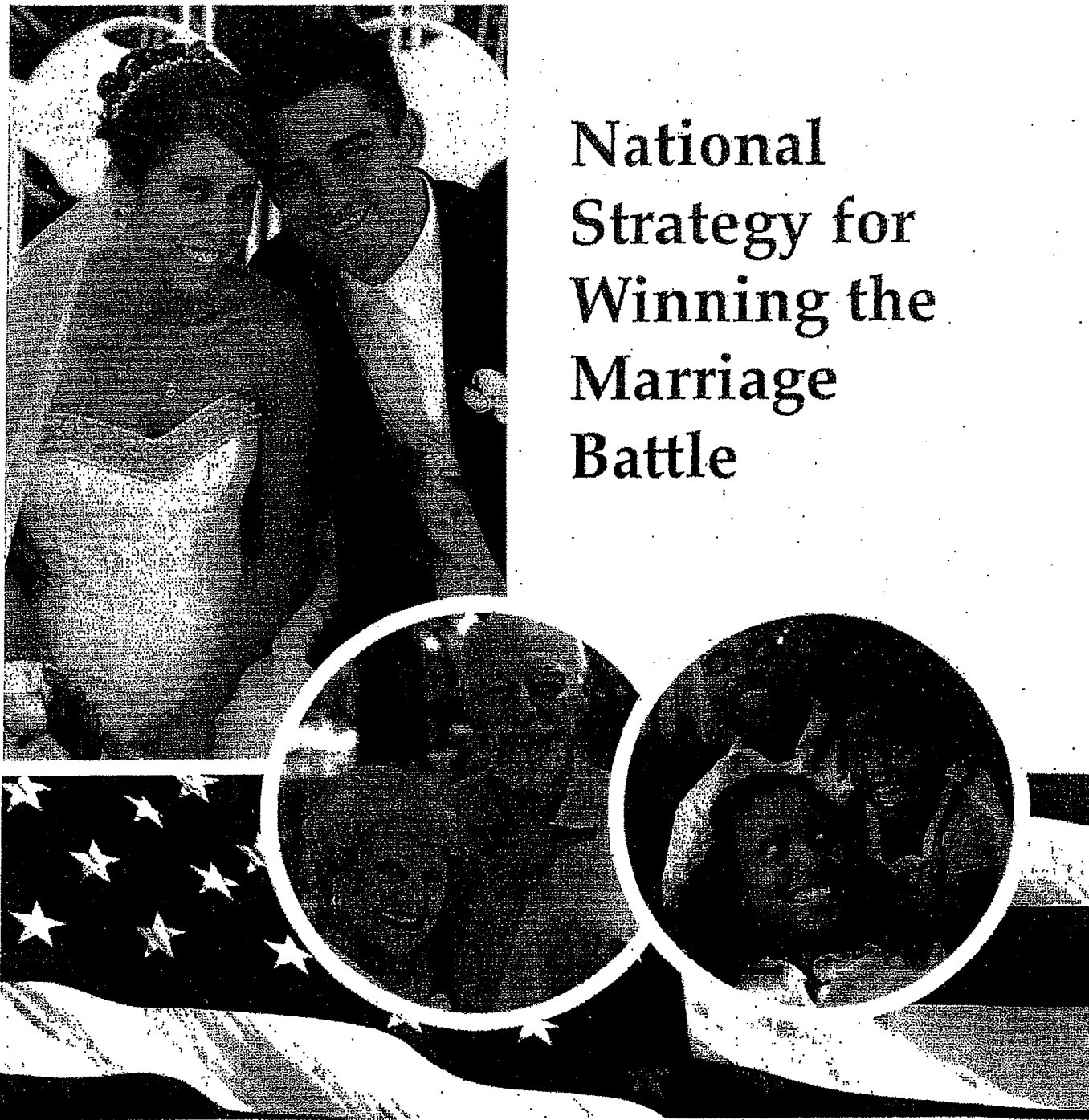
NOM Deposition Exhibit 3:
“National Strategy for Winning the Marriage Battle,” dated August 11, 2009

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NOM Deposition Exhibit 3:

**“National Strategy for Winning the Marriage Battle,”
dated August 11, 2009**



National Strategy for Winning the Marriage Battle

Prepared by the National Organization for Marriage

August 11, 2009

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TABLE OF CONTENTS

A National Strategy for Winning the Marriage Battle.....	3
The Stakes	3
Can We Win?	4
Marriage: A Strategy for Victory.....	6
1. Fall 2009: Stopping Gay Marriage in New Jersey and New York, and Beginning to Roll Back Gay Marriage Elsewhere.....	6
New Jersey.....	6
New York	7
Maine.....	7
Roll Back Judicial and Legislative Enactment of Gay Marriage	8
2. Going on Offense.....	9
The Pennsylvania and Beyond Project	9
Two Million for Marriage.....	10
3. Nationalize the Issue in the Context of the Next U.S. Presidential Election.....	10
Iowa, New Hampshire Projects, and the State Emergency Reserve Fund.....	11
Federal Marriage Political Action Committee.....	12
The American Principles Project	13
4. Cultural Strategies.....	14
The Latino Project: A Pan-American Strategy.....	16
The Next Generation Leaders Project.....	19
“Not A Civil Right” Project.....	20
Expert Witness Project.....	21
Catholic Clergy Project	22
Behind Enemy Lines: Document the Victims—Keeping Gay Marriage Controversial in Massachusetts, Vermont, and Connecticut	22
The Face of the Victims: Rapid Response Video Team and Archive	23
Gay Rights or Parents’ Rights? An Exploratory Project.....	24

National Strategy for Winning the Marriage Battle

Achieving NOM's \$20 Million Strategy for Victory	26
Fundraising Budget	27
\$20 Million for Marriage Fundraising Plan	28
Major Donors	29
Private Phases	30
Public Phase	30
How Can We Possibly Do All This? A Note to Donors.....	30
References	32
Appendix	
Maine Budget	
New Jersey Budget	

A NATIONAL STRATEGY FOR WINNING THE MARRIAGE BATTLE

Marriage will be won or lost in the United States in the next two to three years and victory or defeat in the United States will depend primarily on adequate resources. From a political angle, this strategy requires defeating the pro-gay Obama agenda: a pro-marriage President must be elected in 2012.¹

In less than two years since its creation, the National Organization for Marriage (NOM) has stopped New Jersey from enacting same-sex marriage (thus far), put Proposition 8 on the California ballot in 2008 and contributed to its passage, and invested substantial resources to stop gay marriage in New York. From January 1, 2009 to June 15, 2009, NOM has grown from a donor base of 8,000 to 30,000 and its active constituency has increased from 50,000 to 400,000 (The goal is 50,000 donors and 2,000,000 activists by the end of 2010.) During this time, NOM has raised \$3.5 million and the American Principles Project (APP) (described in more detail below), has raised \$500,000.

In the United States, we've demonstrated a key fact: with adequate resources, we can win the battle for hearts and minds on the marriage issue and then use what we've learned about winning this battle to launch a global movement to protect marriage.

To win marriage, NOM plans to raise an additional \$20 million between July 1, 2009 and the November 2010 elections.

THE STAKES

Marriage is a cornerstone of every known civilization. High rates of family fragmentation drive enormous public costs.² An antifamily culture affects economic performance, expands the regulatory and taxing powers of government, and threatens the family businesses that generate economic growth and prosperity.

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Gay marriage is the tip of the spear, the weapon that will be and is being used to marginalize and repress Christianity and the Church.³ What does the gay marriage idea mean once government adopts it? It means faith communities that promote traditional families should be treated in law and culture like racists. It means that the authority of parents to transmit moral values to children will be eroded.

CAN WE WIN?

The current state of despair over the future of marriage is manufactured, a weapon in our opponents' hand. Our U.S. experience is that victory is possible, even likely, provided we have the resources to fight this battle. (This is why gay marriage advocates have focused relentlessly on harassing and intimidating local donors, trying to cut off the debate by limiting resources,⁴ and why one key advantage we now have is the capacity to protect the identity of our donors.)

The National Organization for Marriage (NOM) and our allies have won key victories both in courts of law and at the ballot box.⁵

Gay marriage has lost 30 out of 30 times when put to voters—not only in culturally and politically conservative states like Louisiana (78 to 22 percent) and Alabama (81 to 19 percent) but also in progressive, liberal states like Wisconsin (59 to 41 percent) and Oregon (57 to 43 percent).

Just this past November in California, one of the most liberal states in the U.S., the majority again rejected gay marriage, as did voters in Florida (62 percent to 38 percent) and Arizona (56 to 44 percent).

The latest Gallup poll shows that, more than six years after gay marriage first became a national issue, most Americans continue to oppose gay marriage (57 percent to 40 percent). By a margin of four to one, more Americans believe gay marriage will hurt our society (48 percent) than make society better off (13 percent).⁶

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The latest CBS News/NYT poll shows a sharp drop in the proportion of Americans who support gay marriage, from 42 percent in April to 33 percent today.⁷

Despite several recent high-profile court victories, the majority of U.S. courts have rejected the idea that gay marriage is a constitutional right, including the high courts of New York (2006), Washington State (2006), New Jersey (2006) and Maryland (2007). We contributed by organizing highly respected scholars to sign onto amicus briefs supporting marriage in each of these cases.⁸ []

We have learned much about how to win the marriage battle. What we need now is to find the resources to prosecute and expand this strategy to win marriage in the U.S., and to expand it into a global movement.

MARRIAGE: A STRATEGY FOR VICTORY

Our goal is to use a victory in the U.S. to launch a global movement to reverse the tide on cultural and legal respect for core family values like marriage.

Our strategy for victory is four-pronged:

1. **Fall 2009: Stopping Gay Marriage in New York and New Jersey, and Beginning to Roll Back Gay Marriage Elsewhere**

Prevent gay marriage from being enacted in New Jersey and New York, nullify the legislature-enacted gay marriage bill in Maine, and begin to roll back gay marriage where it has been imposed by courts or legislatures.

New Jersey

Early polls for the November 2009 New Jersey gubernatorial race show the pro-marriage Republican candidate leading the pro-gay marriage Democratic incumbent by a wide margin (15% or more). It appears likely the incumbent will make marriage a top election issue, and a Republican victory is necessary but not sufficient for stopping gay marriage in New Jersey. Even if the Republican wins and more so, it is expected the Democrat-controlled legislature will attempt to pass gay marriage during the lame duck session (after the election and before the new governor takes office). Killing the bill in the Senate is our best hope for the defeat of SSM in New Jersey—and funding this fight immediately is urgent because a possible vote is only a few short months away. We will launch an integrated direct mail, automated calling, e-mail outreach and media effort focusing on ten key Senate districts. Schubert Flint Public Affairs will manage the New Jersey effort and create at least one New Jersey specific television and radio commercial for this effort.

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NOM Budget for New Jersey—501 (c)(4) \$1,600,000

New York

In June, when we learned of backdoor efforts to push gay marriage through the legislatures NOM quickly raised \$600,000, ran radio and TV ads, and also used robocall technology to generate more than 25,000 phone calls into 25 key state senate districts. NOM's efforts helped interrupt the plan to pass gay marriage quickly and quietly, before voters could object. The collapse of the leadership coalition (two Democrats switched briefly to the GOP, switching control of the chamber, before jumping back to the Democrat folds) ended hopes for passing gay marriage this summer.

We will keep the pressure on, focusing on building a reserve fund to generate phone calls when and as gay marriage comes up for a vote.

NOM has also pledged to raise \$500,000 for our state marriage PAC and use it to fund a primary challenge to any GOP senator who votes for gay marriage (holding GOP votes as Tim Gill's money flows into the state is key to success). We are developing our small donor lists. NOM's direct donations to our Marriage PAC are limited by state law to \$5000 so we are not requesting money for the PAC in this proposal. Local GOP leaders' decision to promote one of the few GOP assemblymen who voted for gay marriage to run in a special election for Congress in the 23rd District is also on the radar screen of our federal PAC.

NOM Budget for New York—501 (c)(4) \$400,000

Maine

Maine is strategically important because it presents the only opportunity in 2009 to use a ballot measure to nullify a legislatively-enacted same-sex marriage law passed this spring and thus demonstrate—contrary to what the national press

would have us believe—that once again, when the people are allowed to decide, they support traditional marriage (April 2009 polls showed 49.5 % of the people of Maine favor traditional marriage. This number is possibly now higher, as the polls were taken before the legislature passed the gay marriage law thus angering the people, and also, because polls have historically understated the traditional marriage position—some people just don't want to tell a pollster they are for traditional marriage). NOM has helped create and manage the StandforMarriageMaine.com referendum committee and is pleased to report that we have submitted nearly twice the signatures necessary to put the "people's veto" measure on the November 2009 ballot. Schubert Flint Public Affairs, who managed the successful Proposition 8 campaign, is managing the Maine campaign. We are working closely with the Catholic Church and Bishop Malone of Portland. NOM Executive Director Brian Brown serves on the Executive Committee of the Maine Campaign alongside Marc Mutty, the Catholic Church's Director of Public Affairs. The seed money that NOM initially provided has encouraged Bishop Malone to lead the fundraising effort—to date he has raised \$150,000 and more than matched our initial funding.

A victory in 2009 in Maine is critical to stopping the momentum of the same-sex marriage movement in the Northeast. The total budget for Maine is \$3.5 million. We cannot designate any money given to NOM to the Maine effort because of disclosure requirements. But we do plan to contribute a total of \$1 million to the campaign.

NOM Budget for Maine—501 (c)(4)	\$1,000,000
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Roll Back Judicial and Legislative Enactment of Gay Marriage

Beginning in 2009 and through 2012, roll back same-sex marriage where it has been imposed by courts or enacted by legislatures (Massachusetts, Connecticut, Vermont, New Hampshire, Maine and Iowa).

Of these six states, New Hampshire and Iowa are the two states that have direct implications for the 2012 presidential elections, and they also happen to be the

states with the greatest possibility of rolling back same-sex marriage. For these reasons, priority will be given to these two states; should opportunities develop in Connecticut, Vermont and Massachusetts as momentum builds in our favor, these will be explored. More on New Hampshire and Iowa below.

2. Going on Offense

The Pennsylvania and Beyond Project

One of the strategic challenges NOM has faced is that we are playing on our opponent's home turf: fighting back efforts to impose gay marriage and striving to protect religious liberty in blue states.

We have managed to expand donor and activists base rapidly in spite of the fact our core activities have been in liberal states. But a strategic goal of NOM is to break out of this cycle, building the organization, expanding our donor base, and energizing our grassroots by pushing for marriage amendments in red and purple states, including Pennsylvania, North Carolina and Indiana.

Local pro-marriage groups in states like Pennsylvania have relied on diffuse public opinion rather than sophisticated political organizing to push marriage amendments in these states. To add political muscle to our movement, NOM works with local groups while using sophisticated technology to reach out to voters, supplemented by persuasive radio, TV, and internet advertising to (a) identify the marriage voters for future electoral purposes, (b) generate phone calls to legislators from constituents, and (c) fundraise. In North Carolina, we will use a marriage amendment to identify our voters throughout the state, not only to push a marriage amendment, but to permit us to turn out our voters for the judicial elections there in 2010.

~~NOM Budget: Pennsylvania and Beyond Project — 501 (c)(4) — \$2,000,000~~

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Two Million for Marriage

The goal of the Two Million for Marriage effort is to use the Obama administration's priority of the repeal of DOMA to rally a nationwide donor and activist base, recruiting two million activists and 50,000 donors by the election of 2010. We have already launched a \$2 million e-mail, direct mail, and automated call campaign and have gained nearly 500,000 activists and roughly 15,000 new donors in our first few months of this effort. Senator Rick Santorum has served as the face of this effort through e-mail and direct mail. Senator Santorum has recently agreed to use his voice in a nationwide automated call effort to solicit activists and donations. An additional \$2 million will allow us to reach our goal of two million activists and an additional 25,000 donors by March of 2010—well before our own timetable of the election of 2010.

~~NOM Budget for Two Million for Marriage—501 (c)(4) \$2,000,000~~

3. Nationalize the Issue in the Context of the Next U.S. Presidential Election.

Marriage needs to be a national (and ultimately international) effort, not just a local or regional issue. If marriage is going to be preserved as between a man and a woman in the United States, two things must happen: the pro-gay agenda of President Obama must be defeated in 2012, and it must be replaced by one that expressly articulates a pro-marriage culture. For this to happen, we count on three things:

Iowa, New Hampshire Projects, and the State Emergency Reserve Fund

New Hampshire and Iowa are the two states that lead off the U.S. presidential primaries. Presidential campaigns are launched immediately after the mid-term (2010) elections. We expect the effort to take back these legislatures will take us beyond the 2010 election and into 2012. However, by making marriage an issue in the 2010 election in these states, we expect to force presidential contenders to deal with the issue, and since we know these are generally pro-marriage states, we anticipate pro-marriage candidates to do well and thus influence the U.S. presidential races in 2012.

Iowa. We are in the process of hiring a full-time political organizer to identify key races in Iowa, begin candidate recruitment, and to manage our overall efforts in Iowa. We know that there are key opportunities in Iowa, and have been working closely with Congressman Steve King to lay out a plan to flip the Iowa legislature. This money will be used to hire a full-time employee, set-up and administer an office, and to deal with the legal obligations in creating and administering a state political action committee.

NOW Budget for Iowa—501(c)(4) \$1,000,000

New Hampshire. Passage of same-sex marriage in New Hampshire has brought Democratic Governor John Lynch's election numbers down to the lowest point in his entire term. We are working with Republican Party chairman and former Governor John Sununu to implement a plan to defeat Governor Lynch and flip both houses of the legislature. We have already helped defeat one pro-same sex marriage candidate in a special election. We are targeting 100 House districts and 10 Senate districts. The overall budget for our part of this effort is \$2 million—\$1 million to defeat Lynch and \$1 million to flip the legislature. Most of this money will be spent in 2010, but we have budgeted \$300,000 to continue our successful "Lynch Lied" radio and television campaign

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targeting Lynch as well as our successful automated calling voter ID and donation program, through the rest of 2009.

NOM Budget for New Hampshire: 501(c)(4) \$2,000,000

State Emergency Reserve Fund. We have to be ready for a decisive, rapid and effective response in whatever states gay marriage advocates decide to act to push gay marriage. Such a state emergency fund will also act as a discouragement to politicians tempted by their base to push this divisive issue on their constituents.

Given the threats of intimidation to donors who support marriage in California and nationwide, we face a serious hurdle in getting state ballot initiatives and candidate campaigns funded because donors must be disclosed. However, if NOM makes a contribution from its own resources that are not specifically designated for one of these efforts donor identities are NOT disclosed. Given that a ballot initiative is likely to be on the ballot to overturn Proposition 8 in 2010, that Maine may require additional funding, that both Iowa and New Hampshire require disclosure of donors for political activity—it is critical that we have a reserve fund to give to these efforts to ensure victory and protect donor identity. Our goal is to raise \$300,000 for this reserve fund in 2009, and \$2.7 million in 2010 before the 2010 elections.

NOM Budget for State Emergency Reserve Fund: 501(c)(4) \$3,000,000

Federal Marriage Political Action Committee

As we build assets in specific states (identifying marriage voters, activists and small donors) we want to direct these assets to electing pro-marriage legislators in Congress. A Federal Marriage Political Action Committee (PAC) will help us block the repeal of the Defense of Marriage Act, influence Supreme Court

nominations, and promote a federal marriage amendment. We will be launching a federal PAC in the fall of 2009.

Building a network of regional political directors will help us identify and recruit candidates. Politically significant states (besides New Hampshire and Iowa) in Senate and presidential politics include: South Carolina, Florida, Ohio, Minnesota, Indiana, Pennsylvania, Nevada, Connecticut, New Mexico, Nevada, Colorado, and Michigan.

Because of NOM's unique structure, we can spend unlimited funds through our 501(c)(4) toward promoting the PAC to our current (nearly 30,000) financial supporters. Our 501(c)(4) can bear the costs of the electioneering, without identifying donors.

NOM Federal Marriage PAC 501(c)(4) \$1,000,000

The American Principles Project

Expose Obama as a social radical. Develop side issues to weaken pro-gay marriage political leaders and parties and develop an activist base of socially conservative voters. Raise such issues as pornography, protection of children, and the need to oppose all efforts to weaken religious liberty at the federal level. This is the mission of the American Principles Project (www.americanprinciplesproject.com).

The monthly operating budget for American Principles Project is approximately \$50,000. APP is currently developing a comprehensive blog to cover all issues that impinge on founding principles, is operating on Facebook and Twitter, and has several social networks for professors and students in the formative stages. In addition, APP has launched a project to contact Congress on keeping the Guantanamo prison open and in opposing the appointment of Kevin Jennings to the Safe Schools position at the Department of Education. We plan two comprehensive projects for the next six months that require separate funding.

The Preserve Innocence Project will monitor all administration initiatives from the White House, Department of Justice, Education Department, and the Health and Human Services Department that affect the welfare of children. We will put a special focus on exposing those administration programs that have the effect of sexualizing young children. We will provide a weekly update to Congress, to conservative leaders and to the national media on personnel or policy threats to childhood innocence. We will work with Congress to develop appropriate legislation to reverse current Department of Education policies that use the Safe Schools program to foist de facto sex education on children as young as kindergarten age. The cost for promoting this program is \$150,000.

There is an opportunity to develop a strong Hispanic voice for foundational American principles. Hispanics are socially conservative and economically entrepreneurial. The conservative movement has done little to forge close ties with a community that may soon become the single most pivotal voting bloc in national elections. The APP project will develop young Hispanic spokesmen for traditional values. We will establish an internet home for Hispanics who want to participate actively in developing arguments to their community on behalf of core principles. We anticipate this project to be self-funding from new financial sources within nine months of its inception. Personnel and start-up/operating costs will be \$150,000.

APP Budget 501(c)(3) and (c)(4) \$1,000,000

4. Cultural Strategies

Grassroots activism which can generate real political impact is an important "missing ingredient" among social conservatives generally and on the marriage issue particularly. Building such a capacity is a key part of NOM's strategy for victory.

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But to win the marriage debate will require more: innovative cultural strategies to hold and expand our base of committed marriage supporters—especially among influential elites and the next generation.

NOM's cultural strategy has a special focus on the next generation. We understand that the transmission of basic moral values across generations involves more than rational argument, especially in an age where the market, academia, media and Hollywood conspire to present intellectually shallow but emotionally appealing arguments and images for gay marriage.

Values and character are transmitted through the related processes of emotional engagement and identity formation, as well as rational argument. People ask not only, "What do I cognitively believe about right and wrong?", but also "Whom do I aspire to be like?" What and who makes me feel good about the Good?

Reason influences emotional commitments, but emotional commitments give rise to rationalizations as well. People avoid adopting views that strike them as painful and are attracted to adopting reasons for views that provide emotional satisfaction.

We also recognize that reason influences people not only directly (though the power of argument), but indirectly, through the social prestige attached to intelligence and to intellectual elites. The good and the true and the beautiful each have their power, and that power is greatest and most persuasive when they are made mutually reinforcing.

NOM's ambitious cultural strategies projects aims at influencing, sustaining, reinforcing and expanding these basic processes implicated in character formation, with special attention to identity and emotional impact. We are looking for a new set of messengers and a new, more emotionally powerful set of messages on the marriage issue: Whom will I hurt if I abandon marriage? For whom am I standing in standing for marriage?

Here's the bottom line: Hollywood with its cultural biases is far bigger than we can hope to be. We recognize this. But we also recognize the opportunity—the disproportionate potential impact of proactively seeking to gather and connect a

community of artists, athletes, writers, beauty queens and other glamorous non-cognitive elites across national boundaries. (This is applying the Witherspoon and IAV model to non-intellectual elites.) When people are isolated they are silent and ineffectual; in community they gather courage and also give courage (by being visible to others). Precisely because Hollywood is currently so massively biased, there is an opportunity for a small countercultural community to have a disproportionate cultural impact.

When Carrie Prejean first burst on the national scene, the Miss California USA organization responded by cutting an ad featuring beauty pageant queens who were for gay marriage. This effort fell completely flat: nobody noticed because no one was surprised. All the beautiful people are supposed to be for gay marriage. One Carrie Prejean had an enormous, disproportionate effect on the national debate (at least temporarily) because she interrupted Hollywood's monopoly, its false cultural assertion that youth + beauty = support for redefining marriage. See Maggie Gallagher, "The Carrie Effect" *National Review*, August 10, 2009.

The Latino Project: A Pan-American Strategy

The Latino vote in America is a key swing vote, and will be so even more so in the future because of demographic growth. Will the process of assimilation to the dominant Anglo culture lead Hispanics to abandon traditional family values? We can interrupt this process of assimilation by making support for marriage a key badge of Latino identity.

We aim to identify young Latino and Latina leaders, especially artists, actors, musicians, athletes, writers, and other celebrities willing to stand for marriage, regardless of national boundaries. (For example: Eduardo Verástegui, the young actor who starred in *Bella*, has come to us offering to be a major spokesperson on marriage; we have also met with a former Miss Mexico in preliminary work on this project.) Here's our insight: The number of "glamorous" people willing to buck the powerful forces to speak for marriage may be small in any one country.

But by searching for these leaders across national boundaries we will assemble a community of next generation Latino leaders that Hispanics and other next generation elites in this country can aspire to be like. (As "ethnic rebels" such spokespeople will also have an appeal across racial lines, especially to young urbans in America).

With the help of Schubert Flint Public Affairs, we will develop Spanish language radio and TV ads, as well as pamphlets, YouTube videos, and church handouts and popular songs. Our ultimate goal is to make opposition to gay marriage an identity marker, a badge of youth rebellion to conformist assimilation to the bad side of "Anglo" culture.

National Strategy for Winning the Marriage Battle

BUDGET: \$2.1 million	
Hispanic outreach coordinator [\$75k plus benefits (total \$90k/year) x 2 years]:	\$180,000
Travel budget for coordinator [\$35k/year x 2 years]:	\$70,000
Radio and TV ad development (Schubert Flint) [\$40k/year x 2 years]:	\$80,000
Radio and TV ad production [\$50k/year x 2 years]:	\$100,000
Spanish radio and TV ads [\$500k/year x 2 years]:	\$1,000,000
YouTube productions/viral marketing outreach [\$50k/year x 2 years]:	\$100,000
PR Outreach to Hispanic TV, radio, print and online publications [3-4 months/year @ \$10k/month = \$35,000/year x 2 years]	\$70,000
Hispanic outreach for Ruth Institute and Love and Fidelity next generation leaders conferences (scholarships to conference, travel by conference organizers to meet with leaders) [\$50k x 2 years]:	\$100,000
Phone outreach (robocalling) to Latino zip codes [\$100k x 2 years]:	\$200,000
Direct mail and email outreach [\$100k x 2 years]:	\$200,000
SUBTOTAL	\$2,100,000

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The Next Generation Leaders Project

By conducting student conferences, speakers and debates, we aim to find, train, and equip young leaders on the marriage issue at Ivy League and equivalent universities. NOM has launched the Ruth Institute for this purpose and is working with the Love and Fidelity Network to replicate the success of the Anscombe Model on the Princeton Campus at other Ivy League schools.

The Ruth Institute, an arm of NOM headed by Dr. Jennifer Roback Morse, will sponsor two to three next generation leaders training sessions on marriage each year. (The first such prototype conference was held August 6 in San Diego.)

Love and Fidelity Network, centered at Princeton, is building a network of chastity-supportive organizations at Ivy League colleges. The centerpiece of LFN's networks is an annual student conference that draws 200 to 300 leaders from Ivy League and equivalent universities. NOM will "piggyback" on these existing conferences (and search for other similar venues) to identify, train, and equip next generation leaders on marriage, including media training.

But in keeping with the aims of the Cultural Strategies Project we will not confine our mission to attract and cultivate a community of cognitive elites alone. Through the Love and Fidelity Film Festival and YouTube and Song contest, we will seek to identify a next generation of elites capable of creating pro-marriage culture more broadly construed.

BUDGET: \$500,000	
Two student conferences per year with Ruth Institute [\$35k each conference x 2 years]	\$140,000
Marriage and media training at Love and Fidelity Network conferences [\$25k x 2 years]	\$50,000
Love and Fidelity Ad contest (YouTube and poster) [\$20k x 2 years]	\$40,000
Love and Fidelity Youtube, Film and Song Festival and Contest	\$120,000
Website maintenance, email outreach to college students [\$30k x 2 years]	\$60,000
NOM youth coordinator [\$35k plus benefits (total \$45k) x 2 years]	\$90,000
SUBTOTAL	\$500,000

“Not A Civil Right” Project

The majority of African-Americans, like the majority of Americans, oppose gay marriage, but Democratic power bosses are increasingly inclined to privilege the concerns of gay rights groups over the values of African-Americans. A strategic goal of this project is to amplify the voice and the power of black Americans within the Democratic Party. We aim to find, equip, energize and connect African-American spokespeople for marriage; to develop a media campaign around their objections to gay marriage as a civil right. No politician wants to take up and push an issue that splits the base of the party.

National Strategy for Winning the Marriage Battle

BUDGET: \$1.5 million	
Radio and TV ad production:	\$100,000
Media buys / direct outreach (targeted radio/TV ads and robocalling in black neighborhoods in NJ, NY, North Carolina, and other key battlegrounds):	\$1,100,000
African-American outreach to next generation leaders conferences (scholarships to conference, travel by conference organizers to meet with leaders):	\$50,000
Black bloggers project: George Soros led the way in using small amounts of money to shape the discourse in the internet:	\$70,000
NOM African-American outreach coordinator/spokesperson [\$75k plus benefits (total \$90k) x 2 years]:	\$180,000
SUBTOTAL	\$1,500,000

Expert Witness Project

Identify and nurture a worldwide community of highly credentialed intellectuals and professional scholars, physicians, psychiatrists, social workers, and writers to credential our concerns and to interrupt the silencing that takes place in the academy around gay marriage and related family issues. Marriage as the union of husband and wife has deep grounding in human nature, and is supported by serious social science.

BUDGET	\$50,000
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Catholic Clergy Project

All clergy are key influencers on gay marriage, but Catholics are a key swing vote and Catholic clergy are notoriously difficult to personally reach. The Catholic Clergy Project aims to use NOM's close relationships with Catholic bishops to equip, energize and moralize Catholic priests on the marriage issue. NOM has provided this service to bishops in New York, New Jersey, Rhode Island, Iowa, and Kansas to date.

BUDGET: \$50,000	
5 clergy seminars each year for two years [Total 10 seminars @ \$5,000 each]	\$50,000
SUBTOTAL	\$50,000

Behind Enemy Lines: Document the Victims—Keeping Gay Marriage Controversial in Massachusetts, Vermont, and Connecticut

Document the consequences of gay marriage and develop an effective culture of resistance. Polling data in Massachusetts indicate that six years after courts imposed gay marriage, public opposition to gay marriage remains surprisingly strong. It is also, however, very quiet, in part because people fear retaliation and harassment if they speak up for traditional marriage ideas. (In a recent poll 36 percent of people who oppose gay marriage agreed that "if you speak out against gay marriage in Massachusetts you really have to watch your back because some people may try to hurt you."⁹)

Fund a low-cost media campaign (primarily billboards) to support the idea that children need mothers and fathers and to highlight threats and promise support to any citizens attacked for their pro-marriage views; commission polling and other studies to document consequences of gay marriage; and gather a rapid-response team of videographers and reporters to collect and record stories of

those who have been harassed, threatened or intimidated as a result of their support for traditional views on marriage and sexuality across the country and also in Europe and abroad.

BUDGET: \$350,000	
Polling for intimidation effect in gay marriage/civil union regimes [\$10k each poll x 6 polls]:	\$60,000
Study of what schools are teaching in gay marriage/civil union regimes [\$25k each x 4 states/regions]:	\$100,000
PR to maximize polling/studies impact [6 months x \$15k/month]:	\$90,000
Billboards and radio media campaign [\$50k/year x 2 years]:	\$100,000
SUBTOTAL	\$350,000

The Face of the Victims: Rapid Response Video Team and Archive

Who is hurt by gay marriage? The rapid response video project would aim to put an emotionally compelling face on the answer to this question.

When the government punishes some Methodists because they don't allow gay union ceremonies on their own property, we need to capture not only the facts, but the stories—the faces, the names, the emotions of the people threatened with litigation.

When a young Michigan grad students gets kicked out of her school program a few weeks before graduation (as happened this spring) because she won't personally counsel a gay couple on how they can keep their relationship together, we need more than her story—we need her face, her voice, her outrage and her suffering on camera.

When a young Hispanic mother discovers in New Jersey what her first grader is being taught about gay marriage, how does the school counselor respond to her concerns? We need to get her on camera, telling the story of what gay marriage really means.

NOM's rapid response team takes the "document the victims" project national, giving us the capacity to capture the oppression of people's rights, the disregard of their feelings and interests, on video, as it happens, in real time. NOM will contract with a firm (most likely Syndicate Pictures out of Philadelphia) to have a team on retainer ready to fly out at short notice when news stories like these (most of which never hit the national media) occur.

BUDGET: \$250,000	
10 videos each year for 2 years [total 20 videos @ \$5000 each]	\$100,000
Viral marketing of these videos for fundraising, activist and youth messaging purposes	\$60,000
Professional PR for print/media outreach [3 months/year @ \$15k/month x 2 years]	\$90,000
SUBTOTAL	\$250,000

Gay Rights or Parents' Rights? An Exploratory Project

Building on our "behind enemy lines" and "face of the victim" projects, NOM will inaugurate a special effort to focus on the consequences of gay marriage for parental rights.

National Strategy for Winning the Marriage Battle

BUDGET: \$200,000	
Study what schools are teaching on gay marriage in Mass, Vt. And Ct. [covered above – Behind Enemy Lines project]	\$0
Voices of parents with public school children [covered above – Face of the Victims project]	\$0
Polling on parents concerns [1 national poll and 4 state polls]	\$50,000
Children of same-sex couples and their concerns – outreach coordinator to identify children of gay parents willing to speak on camera [\$50k plus benefits (total \$60k/year x 2 years)	\$120,000
Professional PR for print/media outreach [1 month/year @ \$15k/month x 2 years)	\$30,000
SUBTOTAL	\$200,000

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ACHIEVING NOM'S \$20 MILLION STRATEGY FOR VICTORY

In the little over two years since NOM was founded, it has grown to nearly 30,000 members with an annual operating budget of over \$6 million dollars. We have leveraged our limited resources to win major victories—most importantly in California—but also in Arizona and Florida. We are the largest contributor to the “people’s veto” effort in Maine, working to overturn same-sex marriage through the referendum process. And on July 31st, we helped deliver more than 100,000 signatures to the Maine Secretary of State—nearly double the signatures required to put the referendum on the ballot. Yet in the legislative and cultural battles that confront us we are being heavily outspent—and without greater resources we risk losing marriage on these key battlefronts.

The disparity of resources is overwhelming and clear. The Human Rights Campaign alone, our leading national opposition group, has an annual budget of over \$40 million. The Gill Foundation, a 501 (c)(3) organization, has an annual budget approaching \$20 million, and the Gill Action Fund adds \$10-\$15 million more each year in (c)(4) money.

In addition, supporters of same-sex marriage have a multiplicity of smaller organizations funding their efforts on the political level, whereas NOM is the only pro-marriage organization creating and sustaining political action committees at the state level. We will be launching a federal political action committee in the fall of 2009.

Yet, the nearly \$40 million donated to the Proposition 8 effort last year clearly shows that our donors can be motivated to raise large sums of money if the proper plan is put in place.

BUDGET & FUNDRAISING

Project	Raised July 2009	July - December 2009	January - December 2010
NOM New Jersey 501(c)(4)	\$550,000	\$1,050,000	
NOM New York 501(c)(4)		400,000	
NOM Maine 501(c)(4)	100,000	900,000	
NOM Pennsylvania & Beyond 501(c)(4)			2,000,000
NOM 2 Million for Marriage 501(c)(4)	100,000	400,000	1,500,000
NOM Iowa 501(c)(4)		200,000	800,000
NOM New Hampshire 501(c)(4)		300,000	1,700,000
NOM State Emergency Fund 501(c)(4)		300,000	2,700,000
Federal Marriage PAC 501(c)(4)		200,000	800,000
APP 501(c)(3)	125,000	125,000	250,000
APP 501(c)(4)	125,000	125,000	250,000
Cultural Strategies			5,000,000
TOTAL	\$1,000,000	\$4,000,000	\$15,000,000
TOTAL CAMPAIGN			\$20,000,000

Amount raised or pledged to date: \$2 million.

(c)(4) National Organization for Marriage

(c)(3) American Principles Project

(c)(4) American Principles in Action

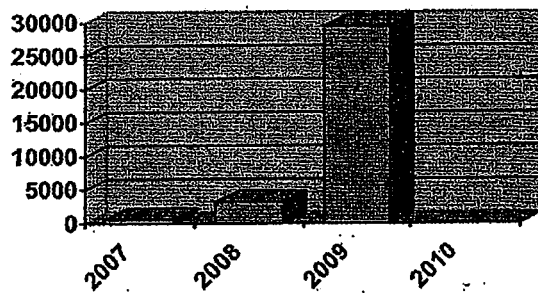
\$20 MILLION FOR MARRIAGE FUNDRAISING PLAN

We have hired Steve Linder, the Finance Director for the Proposition 8 effort, to help manage the fundraising for our \$20 million campaign.

Luis Tellez, Brian Brown, Maggie Gallagher, and Steve Linder will serve on the fundraising committee.

NOM's growth over just the past two years can be seen below:

NOM Donor Growth (2007-2009)



	2007 (July - Dec)	2008	2009 (Jan-July)
Total Donors (cumulative)	658	3,251	29,527

MAJOR DONORS

NOM currently has 66 major donors contributing more than \$5000, including 30 donors at the \$25,000 level, 11 donors at the \$100,000 level, and 3 donors at the \$1 million level.

	\$5000+	\$25,000+	\$100,000+	\$1,000,000+
NOM Major Donors	66	30	11	3

For the current campaign, we have a lead gift of \$1 million toward our goal of \$20 million by the end of 2010. This donor has also committed an additional \$1 million if we have raised or have received commitments for an additional \$3 million by the end of 2009.

Our plan to motivate and move our donors to increase their past giving is dependent upon us clearing the \$5 million hurdle. As with a traditional capital campaign, we have focused on our largest supporters to get us the seed money necessary to encourage our other major donors to step up to the plate.

When we cross the \$5 million threshold we will then focus on supporters whose past giving indicates that they can make a \$100,000 plus gift.

We have identified 36 such individuals or foundations. Some of these individuals may do significantly more or less than this goal, but conservatively, we believe we can raise at least \$3 million by year end from these larger donors.

We will also focus on the 65 donors we have identified as possibly giving \$50,000 or larger gift. We believe we can raise an additional \$2 million from this group by year end.

Once we hit the \$10 million mark we will go public with the fundraising for the effort at the end of March 2010. We will then focus our efforts on a major donor direct mail effort that announces us clearing the \$10 million hurdle and asks for larger gifts from our \$500-\$5000 donors.

PRIVATE PHASES

Phase 1 Goal: Five Million—Completion Date: January 1, 2010

Phase 2 Goal: Ten Million—Completion Date: April 1, 2010

PUBLIC PHASE

Phase 3 Goal: To 20 Million—Completion Date: December 31, 2010

HOW CAN WE POSSIBLY DO ALL THIS? A NOTE TO DONORS

At NOM, we quickly learned that we cannot in the course of just a few years match the network of organizations the gay rights movement has built up over 30 years brick for brick, employee for employee, or dollar for dollar. The top ten gay rights organizations have \$200 million in annual revenues—plus inestimable advantages in media and entertainment and academia.

To expand rapidly to meet the urgent need, NOM has adopted two complementary strategies: First, NOM is partnering with “sister organizations” with whom we have strong personal and mission relationships to extend the impact of what NOM can do directly. (The American Principles Project, Love and Fidelity Network and Ruth Institute are examples.)

Second, NOM has adopted an outsourcing model that allows us to use high-level talent from around the country as needed, rather than build a large, expensive, difficult to manage, “tank” in-house. We have developed ongoing relationships with some of the best contractors in the country who are committed to NOM’s mission to do many of the projects outlined, working under our leadership, mission focus, and accumulating messaging expertise. This allows us to expand

rapidly to meet mission objectives while "outsourcing" certain management headaches (like hiring junior staffers).

For example: Our PR needs are served by Creative Response Concepts, considered the premier conservative PR firm in the country. Their services can be expanded or shrunk on short notice to cope with mission needs.

Our television and radio ads are developed by the team of Schubert Flint Public Affairs, campaign managers for Prop 8. They also handle ad placement, and offer strategic and political insight and serve as our national campaign managers. We can use this team for direct political advocacy, for 501(c)(4) lobbying ads, and for 501(c)(3) public education media messaging.

Frank Cannon and Jeff Bell of Capital City Partners in Washington, D.C. help us coordinate our national strategy.

Gabe Joseph's firm, ccAdvertising, handles robocalling and also the live caller solicitation. He expands and manages staff to deliver for us on relatively short notice in different states, depending on the volume of calls we need placed.

At NOM, we have worked hard to find innovative ways to expand capacity while capitalizing on our core strategic asset: a brilliant, creative, in-house team of extremely mission-focused experts who can spot opportunity, develop innovative strategies to advance the mission, and create a "feedback" information loop that allows us to learn from failure as well as expand on our successes.

REFERENCES

¹ For more on Obama's intentions go to <http://www.americanprinciplesproject.org/blogs/tags/homosexual-lobby/>.

² See Benjamin Scafidi, *The Taxpayer Costs of Divorce and Unwed Childbearing* (New York: Institute for American Values, 2008).

³ See, e.g., Letter dated April 20, 2009 from Professor Thomas Berg (Univ. of St. Thomas Law), Professor Carl Esbeck (Univ. of Missouri Law), Professor Robin Fretwell Wilson (Washington & Lee Univ. School of Law), and Professor Richard W. Garnett (Notre Dame Law) to Speaker Christopher Donovan, Connecticut House of Representatives (available at <http://mirrorofjustice.blogspot.com/files/letter-to-rep.-donovan-re-bill-899-04-20-09.pdf>); Douglas Laycock, et al., eds., *Same-Sex Marriage and Religious Liberty: Emerging Conflicts* (New York: Rowman & Littlefield, 2008); Maggie Gallagher, Banned in Boston: The Coming Conflict Between Same-Sex Marriage and Religious Liberty, *The Weekly Standard*, May 16, 2006.

⁴ See, e.g., Rebecca Cathcart, Donation to Same-Sex Marriage Foes Brings Boycott Calls, *The New York Times*, July 17, 2008, at A15; Tami Abdollah & Cara Mia DiMassa, Prop 8 Foes Shift Attention; The Initiatives Backers Strongly Object to the New Focus on Boycotts, *Los Angeles Times*, November 14, 2008, at A1; Jesse McKinley, Theater Director Resigns Amid Gay-Rights Ire, *The New York Times*, November 13, 2008, at C1; Jennifer Garza, Prop 8 Opponents Target Supporters, *The Oregonian*, November 13, 2008; Valerie Richardson, California Prop 8 Donors Sue for Privacy; Harassment Cited in Case on Campaign Rules, *Washington Times*, March 23, 2009, at A1.

⁵ NOM's initial entry into state-level marriage debate was in the 2007 New Jersey state races, where NOM helped to elect two pro-marriage state legislators, and was credited with helping to make same-sex marriage too controversial to be taken up by the lame duck legislature. See NJ Lawmakers Urged to Move on Gay Marriage Bill, *365Gay.com*, January 10, 2008; Geoff Mulvihill, Gay Marriage Debate Intensifies as Conservatives Get Organized, *Associated Press*, Dec. 15, 2008.

NOM also played a key role in California's Prop. 8 campaign, initially helping to get the measure on the ballot and eventually becoming the largest single donor to the Prop 8 campaign. Geoff Mulvihill, NJ Group Makes Waves in Calif. Gay Marriage Debate, *Newsday*, July 27, 2008; Tasmin Shamima, Princeton-Based Nonprofit was the Top Donor to Fight Prop 8, *Daily Princetonian*, November 19, 2008.

This spring, NOM launched its 2009 Northeast Action Plan, aimed at organizing opposition to same-sex marriage throughout the Northeast U.S. Despite the recent entry onto the state political scene in these states, NOM has worked closely with state groups to fund robocalls, polling, and grassroots organizing activities. See, e.g., Jeremy W. Peters, Group Begins Ad Blitz Against Same-Sex Marriage, *The New York Times*, May 28, 2009, at A22.

Dovetailing with the state efforts is a \$1.5 million national media campaign aimed at drawing attention to the consequences of same-sex marriage, as people of faith are increasingly denounced as bigots simply because they stand up for marriage. Already, hundreds of thousands of people have seen our ads on YouTube, with millions more watching the national TV coverage generated by our ad campaign. See, e.g., NBC Today Show, Carrie Prejean Speaks About Same-Sex Marriage, April 30, 2009; CNN.com, Miss California USA to Appear in Conservative TV Ad, April 30, 2009; Valerie Richardson, Finding Her New Cause, Prejean Promotes Marriage, *Washington Times*, April 29, 2009, at A18.

⁶ See Jeffrey M. Jones, Majority of Americans Continue to Oppose Gay Marriage, Gallup Poll, May 27, 2009, available at <http://www.gallup.com/poll/118378/Majority-Americans-Continue-Oppose-Gay-Marriage.aspx>.

⁷ Poll: Support for Gay Marriage Dips, CBSNews.com Political Hotsheet, June 17, 2009, available at <http://www.cbsnews.com/blogs/2009/06/17/politics/politicalhotsheet/entry5094597.shtml>.

⁸ See Anemona Hartocollis, "New York's Highest Court to Rule on Gay Marriages," *The New York Times*, July 4, 2006 (discussing the friend of the court brief that we filed in New York on behalf of James Q. Wilson and thirteen other prominent scholars). Several of the briefs that we prepared and filed are available at www.doma-watch.org. See also, *Marriage and the Public Good: Ten Principles* (Princeton, NJ: The Witherspoon Institute, 2006), available at www.princetonprinciples.com.

⁹ 2009 NOM Massachusetts Marriage Survey, Five Years After Goodridge: Gay Marriage Divides Massachusetts Voters, May 17, 2009, available at www.nationformarriage.org

National Organization for Marriage New Jersey Budget
 2009 Election and Lame Duck Session
 Draft 2 -- August 1, 2009

BASE BUDGET	Budget			Total
	Phase One		Phase Two	
	September	October	November	
Office/Administration				
Phone/Fax/Misc.	500	500	500	1,500
Shipping/Printing/Copies	500	500	500	1,500
Travel	3,000	3,000	3,000	9,000
Subtotal, Office	\$4,000	\$4,000	\$4,000	\$12,000
Voter Research				
Baseline Survey	25,000			25,000
Subtotal, Research	\$25,000	\$0	\$0	\$25,000
Grassroots				
Robo Calls	40,000	30,000	30,000	100,000
Voter File Match/Enhancement	25,000			25,000
Website	20,000			20,000
Subtotal, Grassroots	\$85,000	\$30,000	\$30,000	\$145,000
Earned Media				
Conferences/Ed Boards				0
Subtotal, Earned Media	\$0	\$0	\$0	\$0
Legal	\$2,500	\$2,500	\$2,500	\$7,500
Accounting	\$2,500	\$5,000	\$5,000	\$12,500
Fundraising				
Consultant				0
Subtotal, Fundraising	\$0	\$0	\$0	\$0
Misc./Contingency	\$1,000	\$10,000	\$10,000	\$21,000
Total, Operations Budget	\$120,000	\$51,500	\$51,500	\$223,000
PAC Contributions/Indep. Expend				
Legislative races	50,000	0	0	50,000
Governor's race	150,000			150,000
Subtotal, PAC Contributions	\$200,000	\$0	\$0	\$200,000
Paid Media Budget				
Direct Mail				
Direct Mail	150,000	50,000	50,000	250,000
Subtotal, Mail	\$0	\$50,000	\$50,000	\$100,000
Campaign Media				
Television	0	0	0	0
Cable		325,000	325,000	650,000
Radio		100,000	100,000	200,000
Phone Banking		40,000	40,000	80,000
Online Advertising/Recruitment	35,000	35,000	35,000	105,000
Production		25,000	25,000	50,000
Subtotal, Campaign Media	\$0	\$525,000	\$525,000	\$1,085,000
Subtotal, Paid Media	\$200,000	\$575,000	\$575,000	\$1,385,000
Total Budget	\$320,000	\$626,500	\$626,500	\$1,608,000

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Maine Marriage Referendum Campaign Budget
November, 2009 Election
 Draft 6 - August 1, 2009
 Recommended Media Levels

BASE BUDGET	May	June	July	August	September	October	November	Total
1 Signature Gathering	\$50,000	\$135,000	\$100,000					\$285,000
Office/Administration								
2 Phone/Fax	250	2,000	2,000	2,000	2,000	2,000	1,000	11,250
3 Shipping/Printing/Copies	250	1,500	1,500	1,500	1,500	1,500	1,000	8,750
4 Travel - Consultants	3,000	3,000	3,000	3,000	3,000	3,000	1,500	19,500
5 Travel - In State		2,500	2,500	2,500	2,500	2,500	1,500	14,000
6 Campaign Office		3,500	1,750	1,750	1,750	1,750	1,000	11,500
7 Campaign Chair (Marc Muffy)		2,500	2,500	2,500	2,500	2,500	2,500	15,000
8 Deputy Director (Mary Conroy)		5,455	5,455	5,455	5,455	5,455	2,725	30,000
9 Evangelical Pastor Reimb. (Emrich)		2,500	2,500	2,500	2,500	2,500	2,500	15,000
10 Admin Staff (Chris)	0	1,200	1,200	1,200	1,200	1,200	600	6,600
Subtotal, Office	\$3,500	\$24,155	\$22,405	\$22,405	\$22,405	\$22,405	\$14,325	\$131,600
Voter Research								
11 Segmentation Study			55,670					55,670
12 Interactive Audience Response Tests (2)				38,350				38,350
13 Strategy Refinement Survey					26,500			26,500
14 Tracking Surveys					13,500	58,500	4,500	76,500
15 Gary Lawrence Consulting			6,000	6,000	6,000	6,000		24,000
Subtotal, Research	\$0	\$0	\$61,670	\$44,350	\$46,000	\$64,500	\$4,500	\$221,020
16 Issue Consulting	\$0	\$0	\$0	\$5,000	\$5,000	\$0	\$0	\$10,000
Grassroots								
17 Website		12,500	12,500	12,500	12,500	5,000	5,000	60,000
18 Collateral	0	0	75,000	50,000	50,000			175,000
19 Grassroots Director (Ryan Hamden)	0	0	3,000	3,000	3,000	3,000	1,000	13,000
20 Field Coordinators (2)				5,000	5,000	5,000	2,000	17,000
Subtotal, Grassroots	\$0	\$12,500	\$90,500	\$70,500	\$70,500	\$13,000	\$8,000	\$265,000
Earned Media								
21 Conferences/Events			1,500	0	1,500	100,000		103,000
22 Communications Director (Scott Fish)			6,000	6,000	6,000	6,000	1,000	25,000
Subtotal, Earned Media	\$0	\$0	\$7,500	\$6,000	\$7,500	\$106,000	\$1,000	\$128,000
Campaign Management								
23 SFPA	10,000	20,000	20,000	30,000	30,000	30,000	15,000	155,000
Subtotal, Campaign Management	\$10,000	\$20,000	\$20,000	\$30,000	\$30,000	\$30,000	\$15,000	\$145,000
24 Legal	\$0	\$3,500	\$3,500	\$3,500	\$3,500	\$3,500	\$3,500	\$21,000
25 Accounting	\$0	\$5,000	\$5,000	\$7,500	\$7,500	\$7,500	\$10,000	\$42,500
Fundraising								
26 Sterling Corporation	0	10,000	10,000	10,000	10,000	10,000	10,000	60,000
Subtotal, Fundraising	\$0	\$10,000	\$10,000	\$10,000	\$10,000	\$10,000	\$10,000	\$60,000
27 Misc./Contingency	\$1,000	\$10,000	\$10,000	\$10,000	\$20,000	\$20,000	\$20,000	\$91,000
Total, Operations Budget	\$64,500	\$220,155	\$330,575	\$209,255	\$222,405	\$276,905	\$86,325	\$1,400,120
Paid Media Budget								
Direct Mail								
28 Direct Mail					150,000	150,000		300,000
Subtotal, Mail	\$0	\$0	\$0	\$0	\$150,000	\$150,000	\$0	\$300,000
Campaign Media (recommended)								
29 Television (4120 TRPs)					240,785	361,177		601,962
30 Cable (2060 TRPs)					123,303	184,955		308,258
31 Radio (2425 TRPs)					210,000	316,000		525,000
32 Online Advertising				25,000	50,000	100,000		175,000
33 Production					130,000	130,000		260,000
Subtotal, Campaign Media	\$0	\$0	\$0	\$25,000	\$754,088	\$1,091,132	\$0	\$1,870,220
Subtotal, Paid Media	\$0	\$0	\$0	\$25,000	\$904,088	\$1,241,132	\$0	\$2,170,220
Total Budget	\$64,500	\$220,155	\$330,575	\$234,255	\$1,126,493	\$1,518,037	\$86,325	\$3,570,340

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