Analysis by The Center For Political Accountability of Corporate Contributions to State Attorneys General, Directly or Through Third Party Groups in the 2016, 2018, & 2020 Election Cycles
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ACKNOWLEDGMENTS

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Climate change has rapidly transitioned into a stark reality today as its effects have become increasingly evident in the daily lives of many Americans. The recent acceleration of the Environmental, Social and Governance (ESG) movement has also pushed climate change to the forefront for investors and corporations, with many adapting their policies and strategies to recognize their responsibilities in the form of explicit targets reducing their greenhouse gas emissions through commitments to frameworks such as Net Zero.

It is often said that what gets measured gets managed, with all of the accordant risks with selecting a wrong or insufficient indicator of progress. It’s through this lens that the Center for Political Accountability’s analysis is so vital and timely. It highlights the impact of corporations’ political contributions in hampering the progress of policies designed to reduce the rate of emissions. As this report states, “climate change is an operational threat to corporations” and many well-known corporations operating across industry sectors are moving ahead with goals and policies to reduce their emissions footprint.

This report raises a business risk, as many of these same companies have not aligned their political spending policies and practices with their climate objectives. In addition to the private sector’s important role in modifying their operations to curtail contributions to global warming, the role of governments enacting climate legislation is widely recognized as among the most impactful levers for achieving the Paris Agreement’s 1.5 degree Celsius target for limiting global warming. “Hollow Policies”
As this report states, “climate change is an operational threat to corporations” and many well-known corporations operating across industry sectors are moving ahead with goals and policies to reduce their emissions footprint.

Kevin Brennan currently serves as Co-Head of the Investment Engine and Director of Investment Systems at Bridgewater Associates, having joined the firm in 2003. He has been a board member at the Center for Political Accountability since 2020 and on the Investment Advisory Board at the Leadership Now Project since 2018.
INTRODUCTION

The need for corporations to change their business practices to address climate change is quickly heating up, and shareholders are taking notice. In 2021, hedge fund Engine No. 1 successfully placed three new directors on the board of Exxon Mobil in order to push the company to create a new business plan that includes a transition towards clean energy.

Additionally, climate change is an operational threat to corporations trying to do business in the future. An analysis from Deloitte says that “[F]ailure to limit temperature rise to 1.5 C may result in a reduction of the world’s real GDP per capita by roughly 7% by 2100,” and domestically, “[S]tudies estimate a 1.2% decline in annual gross domestic product (GDP) for every 1 C increase in temperature.”

More immediately, climate change is here, and its effects will be felt through the rest of the century according to the Intergovernmental Panel on Climate Change’s 2021 report. While the effects of climate change directly and immediately threaten the global human population and the ecology, the report’s findings reinforce the need for businesses to transition to either negative, or neutral, carbon emissions.

Many public corporations recognize the threat of climate change and have implemented goals or policies to reduce their own emission footprints. Well-known companies including Walmart, Comcast, Coca-Cola, CVS Health, AT&T, Amazon, Pfizer, Uber, and Anthem all have implemented policies or set goals to reduce their emissions.

However, these same corporations’ treasury dollars have helped elect state attorneys general who have acted to prevent the reduction of emissions in nine separate court cases. Their actions potentially or effectively undermine these donor corporations’ emissions goals and policies.

In the 2016, 2018, and 2020 election cycles, 75 public companies contributed $772,547.32 directly to 16 attorneys general candidates. Fifty-eight public companies that gave $100,000 or more in each cycle to the Republican Attorneys General Association, a 527 political organization under the Internal Revenue Code, contributed a total of $16,521,441 to that organization during the same period.

Over the three election cycles, 22 attorneys general candidates received a total of $5,534,647.32 from
public companies and from RAGA, with $4,762,100 coming from the attorneys general group.

The corporate sums given directly to candidates and also to RAGA came from company treasury funds, not from corporate Political Action Committees (PACs). This means corporate officers decided to contribute directly to attorneys general candidates and to RAGA—placing their corporations at risk in the event of misalignment of their political spending and their stated emissions goals and policies.

Moreover, their contributions to RAGA assume a separate layer of risk on top of their direct contribution to attorneys general candidates. RAGA can receive and spend contributions without limits.

By giving to 527 groups, corporations may surgically maximize the impact of their contributions. Professors Jacob Hacker and Paul Pierson made such a point in CPA’s Conflicted Consequences report:

“For corporations pursuing agendas they do not want scrutinized, this type of spending has three big advantages over traditional political spending: it is less likely to attract attention than PAC contributions that go directly from firms to candidates; it is effectively ‘laundered’ by running through the 527 organization so the donor can duck accountability for specific uses of the money; and it allows resources of many companies to be pooled to achieve maximum impact.”
These corporations’ contributions to RAGA, along with their direct contributions to attorneys general candidates, conflict with company emissions policies and goals. This, in turn, creates risks for corporations’ bottom lines. Thomas P. Lyon, the Dow Professor of Sustainable Science, Technology and Commerce at the University of Michigan’s Ross School of Business, documents this risk in CPA’s 2021 Corporate Enablers report when discussing corporate commitments on climate change and other social issues:

“Listeners welcome these words from corporate leaders, but they remain wary of corporate hypocrisy. This wariness can lead to a backlash when people see companies giving money to politicians and interest groups who support policies that run counter to the vision corporate leaders espouse. This is a particular risk for companies that have not yet devised governance practices ensuring that their political activities are fully disclosed to the Board of Directors, and that government relations officers coordinate with officers in charge of sustainability [and other] efforts.”

This report examines the risk that corporations face when their policies regarding emissions and their political giving are not aligned.

Misalignment not only threatens corporate bottom lines if it leads to shareholder action or consumers taking their business elsewhere. It also hollows out corporations’ own efforts to curb emissions—imperiling their ability to do business in a future ravaged by climate change.

The corporate donations included in this report are only a portion of all corporate expenditures to influence elections, because many companies do not disclose their giving to 501(c)(4) groups, also known as “social welfare” organizations. Those groups are not required to disclose them.

CPA is an advocacy organization that is leading the effort to bring transparency and accountability to corporate political spending. It has documented and warned of the significant risks for companies of spending to influence elections, especially when this spending underwrites, directly or indirectly, outcomes that conflict with stated company values or positions.

For information on the Center for Political Accountability, visit https://www.politicalaccountability.net.
Public corporations that made contributions to national-level 527s or state-level elected officials, 527s, political parties, and political committees.

State-level 527s, political parties, independent expenditure groups, and political committees making contributions to elected officials at the state level.

Clarification Boxes.

Elected Officials who received money from public corporations.

National-level 527s making contributions to state-level elected officials, 527s, political parties, independent expenditure groups, and political committees.

Lawsuits, Amici Curiae, and Intervenor Defender filings.

Contributions from 527s, state-level 527s, political parties, independent expenditure groups, and political committees making contributions to elected officials at the state level.

Public corporations that made contributions to national-level 527s or state-level elected officials, 527s, political parties, independent expenditure groups, and political committees.
LOUISIANA v. BIDEN #2
MISSOURI v. BIDEN

Highlights

* In two cases, Republican state attorneys general sued to keep the Biden Administration from creating a metric to estimate the “social cost of greenhouse gases.”

* This proposed metric “combines climate science and economics to help Federal agencies and the public understand the benefits of reducing greenhouse emissions. The metric is a range of estimates, in dollars, of the long-term damage done by one ton of greenhouse emissions,” according to the White House.

* Academic researchers call this a pivotal first step in reducing emissions on a macro-scale. According to U.C. Santa Barbara Assistant Professor Tamma Carleton, “Increasing the social cost of carbon…will lead to policy choices that lower emissions, ultimately lowering the harm that Americans face from a warming and more variable climate.”

Case Filing Date and Status

* Louisiana v. Biden #2:
  * Case Status: In progress
  * Original Case Filing Date: April 22, 2021

* Missouri v. Biden:
  * Case Status: In progress
  * Original Case Filing Date: March 8, 2021

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1 For further information about the lawsuits cited in this report, see Columbia Law School’s U.S. Climate Change Litigation Database. Links to the individual lawsuit summaries are provided in the following flow charts.
**LOUISIANA v. BIDEN #2**

**25 companies with emissions reduction goal/policy that donated $100,000 or more to RAGA in the 2018 election cycle**

- **RAGA 2018**
  - $4,993,501
  - $2,423,200
  - Ken Paxton (TX): $650,000
  - Steve Marshall (AL): $823,000
  - Ashley Moody (FL): $1,161,500
  - Chris Carr (GA): $74,777

**45 companies with emissions reduction goal/policy that donated $100,000 or more to RAGA in the 2020 election cycle**

- **RAGA 2020**
  - $8,220,598
  - $155,600
  - *Lynn Fitch (MS): $156,250
  - *Jeff Landry (LA): $108,001.32

**Filed as plaintiffs in the case: Louisiana v. Biden #2**

- Ken Paxton (TX): $650,000
- Steve Marshall (AL): $823,000
- Ashley Moody (FL): $1,161,500
- Chris Carr (GA): $74,777
- *Lynn Fitch (MS): $156,250
- *Jeff Landry (LA): $108,001.32

**SOURCES**

**Contributions Totals to and from RAGA:**
Center For Political Accountability drawing on Get.Ante, RAGA contributions reported to IRS

**Direct Contributions to State AGs:**
Center for Political Accountability drawing on Get.Ante, contributions reported to 10 individual secretary of state offices

**Case Filing:**
Nine companies with emissions reduction goal/policy that donated to Doug Peterson in the 2018 election cycle

25 companies with emissions reduction goal/policy that donated $100,000 or more to RAGA in the 2018 election cycle

45 companies with emissions reduction goal/policy that donated $100,000 or more to RAGA in the 2020 election cycle

One company with emissions reduction goal/policy that donated to Austin Knudsen in the 2020 election cycle

Collectively filed as plaintiffs against the Biden Administration in the case: Missouri v. Biden

Doug Peterson (NE): $30,000

Alan Wilson (SC): $230,250

Mike Hunter (OK): $5,000

Mark Brnovich (AZ): $5,100

Leslie Rutledge (AR): $2,700

Derek Schmidt (KS): $40,500

Todd Rokita (IN): $836,600

Sean Reyes (UT): $265,000

Austin Knudsen (MT): $360

SOURCES

Contributions Totals to and from RAGA:
Center For Political Accountability drawing on Get.Ante, RAGA contributions reported to IRS

Direct Contributions to State AGs:
Center for Political Accountability drawing on Get.Ante, contributions reported to nine individual secretary of state offices

Case Filing:
Republican state attorneys generals sued the Biden Administration to stop its 60-day pause on new oil and gas leasing on federal lands and waters. The administration would use the pause to review “the legal and policy implications of the federal minerals leasing program.”

In a January 21, 2021 article titled “Biden administration pauses federal drilling program in climate push,” Reuters reported, “The order appeared to be a first step in delivering on newly sworn-in Biden’s campaign pledge to permanently ban new drilling on federal acreage.”

Resources for the Future’s Brian Prest published a working paper stating that a moratorium on new oil and gas drilling on federal lands could reduce “annual emissions by 80-139 million metric tons of CO₂.”
Nine companies with emissions reduction goal/policy that donated to Doug Peterson in the 2018 election cycle

25 companies with emissions reduction goal/policy that donated $100,000 or more to RAGA in the 2018 election cycle

45 companies with emissions reduction goal/policy that donated $100,000 or more to RAGA in the 2020 election cycle

One company with emissions reduction goal/policy that donated to Austin Knudsen in the 2020 election cycle

Sources:
Contributions to and from RAGA:
Center for Political Accountability drawing on Get.Ante, RAGA contributions reported to IRS

Direct Contributions to State AGs:
Center for Political Accountability drawing on Get.Ante, contributions reported to 10 individual secretary of state offices

Case Filing:
TEXAS v. BIDEN
U.S. ARMY CORP OF ENGINEERS v. NORTHERN PLAINS RESOURCE COUNCIL

Highlights

* In Texas v. Biden, Republican state attorneys general sued the Biden Administration to keep it from revoking the Keystone XL oil pipeline’s presidential permit.


* The Stockholm Environment Institute’s Peter Ericksen and Michael Lazarus showed how the Keystone XL Pipeline could add as much as 110 million tons of CO2 emissions annually if allowed to be completed.

* Additionally, the U.S. State Department said that the tar sands crude oil to be pumped through the Keystone XL pipeline would “emit an estimated 17 percent more GHGs on a lifecycle basis than the average barrel of crude oil refined in the United States.”

Case Filing Date and Status

* Texas v. Biden:
  * Case Status: In progress
  * Original Case Filing Date: March 17, 2021

* U.S. Army Corps of Engineers v. Northern Plains Resource Council:
  * Case Status: Settled
  * Original Case Filing Date: June 15, 2020
**TEXAS v. BIDEN**

Nine companies with emissions reduction goal/policy that donated to **Doug Peterson** in the 2018 election cycle.

25 companies with emissions reduction goal/policy that donated $100,000 or more to **RAGA** in the 2018 election cycle.

45 companies with emissions reduction goal/policy that donated $100,000 or more to **RAGA** in the 2020 election cycle.

One company with emissions reduction goal/policy that donated to **Austin Knudsen** in the 2020 election cycle.

**Filed as plaintiffs in the case:**  
**Texas v. Biden**

**Doug Peterson (NE):** $30,000  
**Ken Paxton (TX):** $650,000  
**Steve Marshall (AL):** $823,000  
**Alan Wilson (SC):** $230,250  
**Mike Hunter (OK):** $5,000  
**Mark Brnovich (AZ):** $5,100  
**Leslie Rutledge (AR):** $2,700  
**Derek Schmidt (KS):** $40,500  
**Wayne Stenehjem (ND):** $10,000  
**Jason Ravnsborg (SD):** $105,500  
**Chris Carr (GA):** $74,777  
**Todd Rokita (IN):** $836,600  
**Sean Reyes (UT):** $265,000  
**Lynn Fitch (MS):** $156,250  
**Jeff Landry (LA):** $108,001.32  
**Austin Knudsen (MT):** $360  

**SOURCES**  
Contributions Totals to and from **RAGA:**  
Center For Political Accountability drawing on Get.Ante, RAGA contributions reported to IRS  

Direct Contributions to **State AGs:**  
Center for Political Accountability drawing on Get.Ante, contributions reported to 16 individual secretary of state offices.  

Case Filing:  
**U.S. ARMY CORPS OF ENGINEERS v. NORTHERN PLAINS RESOURCE COUNCIL**

**SOURCES**

- **Contributions Totals to and from RAGA:**
  - Center for Political Accountability drawing on Get.Ante, RAGA contributions reported to IRS

- **Direct Contributions to State AGs:**
  - Center for Political Accountability drawing on Get.Ante, contributions reported to 12 individual secretary of state offices.

- **Case Filing:**

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**21 companies with emissions reduction goal/policy that donated $100,000 or more to RAGA in the 2016 election cycle**

- **RAGA 2016**
  - $3,307,342

**Nine companies with emissions reduction goal/policy that donated to Doug Peterson in the 2018 election cycle**

- **RAGA 2018**
  - $4,993,501
  - $1,686,400

**25 companies with emissions reduction goal/policy that donated $100,000 or more to RAGA in the 2018 election cycle**

**RAGA 2020**

- **$8,220,598**

**45 companies with emissions reduction goal/policy that donated $100,000 or more to RAGA in the 2020 election cycle**

**RAGA 2020**

- **$108,001.32**

**Filed Amici Curiae in support of the U.S. Corps of Engineers’ position in the case:**

- **U.S. Army Corps of Engineers v. Northern Plains Resource Council**

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*Denotes AG was elected in 2019*
Republican state attorneys generals filed as intervenor defenders and were successful in stopping the Bureau of Land Management’s (BLM) “Venting and Flaring Rule” from going in to effect.

In 2020, the Environmental Defense Fund said “the rule reduced the waste of methane…vented, leaked and flared from natural gas operations on public and tribal lands.”

According to the 2021 Global Methane Assessment, “Methane, a short-lived climate pollutant (SLCP) with an atmospheric lifetime of roughly a decade, is a potent greenhouse gas tens of times more powerful than carbon dioxide at warming the atmosphere.”

The International Energy Agency said global methane emissions were 76 Megatonne in 2020, and, importantly, the venting and flaring rule would have reduced methane from that overall number if it had been allowed to stay in place.

Wyoming v. U.S. Department of Interior:
- Case Status: Settled
- Original Case Filing Date: November 18, 2016
25 companies with emissions reduction goal/policy that donated $100,000 or more to RAGA in the 2018 election cycle

WYOMING v. DEPARTMENT OF INTERIOR

Filed Reply Brief as intervener defenders in support of the states of Wyoming and Montana’s position in the case:

Wyoming v. Department of Interior

$650,000

Wayne Stenehjem (ND): $10,000

Ken Paxton (TX): $650,000

$10,000

$650,000

$4,993,501

$660,000

SOURCES

Contributions Totals to and from RAGA:
Center For Political Accountability drawing on Get.Ante, RAGA contributions reported to IRS

Direct Contributions to State AGs:
Center for Political Accountability drawing on Get.Ante, contributions reported to two individual secretary of state offices

Case Filing:
In California v. Bernhardt and Center for Biological Diversity v. Bernhardt, Republican state attorneys general filed as intervenor defenders in support of then-Secretary of the Interior David Bernhardt. He had been sued for making changes to the Endangered Species Act.

According to the technology website The Verge, in a August 13, 2019 article titled “Weakening the Endangered Species Act could harm humans, too,” the changes to the Endangered Species Act would make “it easier to kick species off the list of officially endangered and threatened wildlife, land that was once off limits is likely to become fair game for digging up more fossil fuels that contribute to…climate change.”

Additionally, in a February 15, 2017 article titled “How the Endangered Species Act Helps Save Humans, Too,” Time reported, “[T]he greatest economic value of ecosystems is the role they play as greenhouse sinks that absorb climate change-causing pollutants like carbon dioxide.”
Two companies with emissions reduction goal/policy that donated to Tim Fox in the 2016 election cycle

21 companies with emissions reduction goal/policy that donated $100,000 or more to RAGA in the 2016 election cycle

Nine companies with emissions reduction goal/policy that donated to Doug Peterson in the 2018 election cycle

25 companies with emissions reduction goal/policy that donated $100,000 or more to RAGA in the 2018 election cycle

Collectively filed as intervenor defenders against California’s position in the case: Center for Biological Diversity v. Bernhardt


SOURCES
Contributions Totals to and from RAGA:
Center For Political Accountability drawing on Get Ante; RAGA contributions reported to IRS

Direct Contributions to State AGs:
Center for Political Accountability drawing on Get Ante; contributions reported to nine individual secretaries of state offices.

RAGA 2016

Tim Fox (MT): $1,320
Sean Reyes (UT): $300,209
Doug Peterson (NE): $30,000

Steve Marshall (AL): $823,000
Lawrence Wasden (ID): $17,000
Mark Brnovich (AZ): $5,100
Leslie Rutledge (AR): $2,700
Derek Schmidt (KS): $40,500
Wayne Stenehjem (ND): $10,000

RAGA 2018

$4,993,501
$772,800

$1,307,342
$245,000
$30,500

$3,307,342
$88,000
$10,000

$2,700
$10,000
$10,000

$3,307,342
$55,209
$30,000

$5,100
$10,000
$10,000
Two companies with emissions reduction goal/policy that donated to Tim Fox in the 2016 election cycle

21 companies with emissions reduction goal/policy that donated $100,000 or more to RAGA in the 2016 election cycle

Nine companies with emissions reduction goal/policy that donated to Doug Peterson in the 2018 election cycle

25 companies with emissions reduction goal/policy that donated $100,000 or more to RAGA in the 2018 election cycle

Collectively filed as intervenor defendants against California’s position in the case: California v. Bernhardt

SOURCES
Contributions Totals to and from RAGA:
Center For Political Accountability drawing on Get.Ante, RAGA contributions reported to IRS

Direct Contributions to State AGs:
Center for Political Accountability drawing on Get.Ante, contributions reported to nine individual secretary of state offices

Case Filing:
Republican state attorneys general filed an Amici Curiae in support of the American Fuel & Petrochemical Manufacturers’ (AFPM) position. AFPM had sued the members of the Oregon Environmental Quality Commission and the Oregon Department of Environmental Quality to stop the Oregon Clean Fuels Program from being implemented.

According to the Environmental Law Monitor, “In 2007, the Oregon legislature instituted a program designed to reduce the state’s greenhouse emissions to at least 10 percent lower than 2010 levels by 2025.”

Ultimately, the Supreme Court declined to hear the case, and program implementation was allowed based on a ruling in favor of Oregon by the United States Court of Appeals for the Ninth Circuit.
Four companies with emissions reduction goal/policy that donated to Jeff Landry in the 2015 election cycle.

21 companies with emissions reduction goal/policy that donated $100,000 or more to RAGA in the 2016 election cycle.

Two companies with emissions reduction goal/policy that donated to Tim Fox in the 2016 election cycle.

25 companies with emissions reduction goal/policy that donated $100,000 or more to RAGA in the 2018 election cycle.

Nine companies with emissions reduction goal/policy that donated to Doug Peterson in the 2018 election cycle.

SOURCES
Contributions Totals to and from RAGA:
Center For Political Accountability drawing on Get.Ante, RAGA contributions reported to IRS

Direct Contributions to State AGs:
Center for Political Accountability drawing on Get.Ante, contributions reported to nine individual secretary of state offices.

Case Filing:
APPENDIX A:
Companies with emissions reduction goals/policies that donated $100,000 or more to RAGA in at least one of the last three election cycles
Companies with emissions reduction goals/policies that donated $100,000 or more to RAGA in the 2016 election cycle

* Altria ...................................................... $355,000
* Reynolds American ............................... $327,950
* Pfizer ..................................................... $210,350
* Citigroup .............................................. $206,850
* Microsoft ............................................. $190,586
* Monsanto ............................................. $180,925
* Walmart .............................................. $180,325
* Comcast .............................................. $164,395
* The Home Depot ................................... $162,436
* eBay ...................................................... $160,000
* CVS Health: ........................................... $153,984
* PepsiCo ................................................ $105,438
* AT&T ..................................................... $105,350
* Caesars Entertainment ......................... $101,440
* Coca-Cola ........................................... $100,788
* Aetna ................................................... $100,725
* Alphabet ............................................. $100,400
* Eli Lilly & Co ......................................... $100,400
* Cigna ................................................... $100,000
* Exxon Mobil ......................................... $100,000
* Visa ...................................................... $100,000
Companies with emissions reduction goals/policies that donated $100,000 or more to RAGA in the 2018 election cycle

* Noble Energy.................................$1,020,000
* Altria...........................................$665,000
* Comcast........................................$250,250
* British American Tobacco...........$250,000
* Southern Co.................................$240,250
* Range Resources.........................$200,000
* Walmart......................................$182,750
* Cigna..........................................$175,650
* CVS Health.................................$157,910
* Coca-Cola.....................................$156,452
* Pinnacle West Capital...................$150,350
* Fresenius Medical Care...............$150,000
* Exxon Mobil.................................$125,375
* AT&T..........................................$125,000
* The Home Depot.........................$113,449
* Intuit..........................................$110,000
* Visa............................................$110,000
* Pfizer.........................................$106,555
* Caesars Entertainment..............$102,680
* Johnson & Johnson......................$100,905
* Peabody Energy Corporation.........$100,525
* Alphabet.....................................$100,400
* América Móvil...............................$100,000
* Capital One Financial Corp.........$100,000
* Newfield Exploration Company......$100,000
Companies with emissions reduction goals/policies that donated $100,000 or more to RAGA in the 2020 election cycle

* Altria......................................................$859,529*
* Comcast ................................................$390,315
* Mallinckrodt ......................................$325,000
* British American Tobacco .....................$295,000
* Walmart .................................................$270,100
* Anthem..................................................$260,000
* AT&T ......................................................$250,000
* Centene ...............................................$250,000
* Citigroup ................................................$225,000
* Entergy ..................................................$225,000
* CVS Health..............................................$213,407
* Pfizer ......................................................$211,980
* The Home Depot ......................................$205,579
* Anheuser-Busch InBev SA/NV ....................$200,525
* Cigna .....................................................$195,350
* Fresenius Medical Care ............................$180,800
* Capital One Financial Corp.....................$175,900
* Uber .......................................................$175,500
* IAC ........................................................$175,000
* NextEra Energy ........................................$175,000
* Bayer AG ...............................................$170,425
* Trinity Industries .......................................$155,750
* Lowe’s Companies...................................$150,750
* Caesars Entertainment ............................$150,350
* Amazon ..................................................$150,000

* Southern Co............................................$143,813
* Chevron.................................................$125,850
* Exxon Mobil ..........................................$125,000
* General Motors .......................................$125,000
* T-Mobile US .............................................$122,475
* Facebook ..............................................$115,350
* Intuit .....................................................$110,000
* 3M .........................................................$107,375
* Coca-Cola ..............................................$105,250
* Johnson & Johnson .................................$101,600
* News Corp .............................................$101,050
* UnitedHealth Group ................................$100,525
* Visa .......................................................$100,475
* Valero .....................................................$100,450
* PayPal .....................................................$100,100
* América Móvil ........................................$100,000
* Astellas Pharma ......................................$100,000
* Fox Corporation .......................................$100,000
* Eli Lilly & Co. ...........................................$100,000
* The Travelers Companies .......................$100,000

*Altria directly contributed $609,154 to RAGA. Juul, in which Altria owns a 35 percent stake, directly contributed $250,375 to RAGA. The $859,529 figure for Altria above is the combined contribution total of Altria and Juul.

Altria conveyed to CPA that it does not control Juul and does not have a controlling interest in Juul. Altria has no input in Juul’s operations, including Juul’s political giving. During the time period covered by this report, Altria did not hold a board seat at Juul, and Altria only voted its Juul shares as a passive investor.
APPENDIX B:

Companies with emissions reduction goals/policies that donated directly to Republican attorneys general candidates since 2015
Companies with emissions reduction goals/policies that donated directly to a Republican attorney general candidate in the 2015 election

**Jeff Landry – Louisiana:**

* Dow .......................................................... $10,000
* Pfizer ........................................................ $9,000
* Altria ......................................................... $1,000
* Bristol-Myers Squibb ............................... $1,000
Companies with emissions reduction goals/policies that donated directly to Republican attorneys general candidates in the 2016 elections

**Tim Fox – Montana:**

* Cigna ......................................................... $1,000  
* Comcast .................................................... $320

**Sean Reyes – Utah:**

* Comcast .................................................... $10,000  
* Altria .......................................................... $10,000  
* The Home Depot ........................................ $5,000  
* Pfizer ........................................................ $5,000  
* Microsoft ............................................... $4,209  
* eBay .......................................................... $3,000  
* American Express ................................ $3,000  
* Walmart ...................................................... $3,000  
* PepsiCo ...................................................... $2,500  
* Citigroup .................................................. $2,000  
* Capital One Financial Corp. ....................... $1,000  
* Caesars Entertainment ............................. $1,000  
* Coca-Cola ............................................... $1,000  
* McDonald’s .............................................. $1,000  
* Reynolds American .................................... $1,000
Companies with emissions reduction goals/policies that donated directly to Republican attorneys general candidates in the 2018 elections

<table>
<thead>
<tr>
<th>Steve Marshall – Alabama:</th>
<th>Chris Carr – Georgia:</th>
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<tbody>
<tr>
<td>* Regions Financial Corp. ................................ $21,000</td>
<td>* Altria .......................................................... $13,200</td>
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<td>* Pfizer .................................................. $18,000</td>
<td>* Comcast .................................................... $10,777</td>
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<td>* Comcast .................................................. $17,500</td>
<td>* Aflac ........................................................ $9,100</td>
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<td>* Altria ................................................... $15,000</td>
<td>* Pfizer ......................................................... $5,000</td>
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<td>* Eli Lilly &amp; Co. .......................................... $5,000</td>
<td>* RELX .......................................................... $4,000</td>
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<td>* AT&amp;T ...................................................... $3,000</td>
<td>* Alzheimer ................................................... $3,500</td>
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<tr>
<td>* Aflac ...................................................... $2,500</td>
<td>* British American Tobacco ........................ $2,500</td>
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<td>* Alkermes Plc ........................................... $2,500</td>
<td>* Cigna ........................................................ $2,500</td>
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<td>* Walmart .................................................. $2,500</td>
<td>* Norfolk Southern .......................................... $2,500</td>
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<tr>
<td>* Bayer AG .................................................. $2,000</td>
<td>* CVS Health .................................................. $2,000</td>
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<tr>
<td>* CenturyLink ............................................... $1,500</td>
<td>* 21st Century Fox ........................................... $1,000</td>
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<tr>
<td>* McDonald’s ............................................... $1,000</td>
<td>* Coca-Cola ................................................... $1,000</td>
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<tr>
<td>* British American Tobacco .............................. $1,000</td>
<td>* CSX .............................................................. $1,000</td>
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<td>* 3M ............................................................. $500</td>
<td>* McDonald’s ................................................... $1,000</td>
</tr>
<tr>
<td>* HomeServe ................................................ $500</td>
<td>* The Walt Disney Company ............................. $1,000</td>
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<tr>
<th>Ashley Moody – Florida:</th>
<th>* The Walt Disney Company ............................. $10,000</th>
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<tr>
<td>* Emera ........................................................ $30,000</td>
<td>* Anheuser-Busch InBev SA/NV ................................ $7,500</td>
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<tr>
<td>* Altria ........................................................ $25,000</td>
<td>* Allstate ....................................................... $7,000</td>
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<td>* Hilton Hotels .............................................. $15,000</td>
<td>* Visa ........................................................... $5,000</td>
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<tr>
<td>* PepsiCo ..................................................... $12,000</td>
<td>* Walgreens Boots Alliance ................................ $5,000</td>
</tr>
<tr>
<td>* Comcast .................................................... $10,000</td>
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</tbody>
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Lawrence Wasden – Idaho:
* Alphabet ................................................... $3,000
* Pfizer ........................................................ $2,500
* Comcast ................................................... $1,500

Derek Schmidt – Kansas:
* Walmart .................................................... $4,000
* CenturyLink .............................................. $3,000
* Comcast ................................................... $3,000
* Exxon Mobil ............................................. $3,000
* Union Pacific Railroad............................... $3,000
* Visa .......................................................... $3,000
* Anheuser-Busch InBev SA/NV ........................ $2,000
* Alphabet ................................................... $2,000
* AT&T ......................................................... $2,000
* Capital One Financial Corp. ........................ $2,000
* Accenture ............................................... $1,000
* Bayer AG ................................................ $1,000
* McDonald’s ............................................. $1,000
* Coca-Cola ............................................... $500

Doug Peterson – Nebraska:
* Bayer AG ................................................ $7,500
* Aflac ......................................................... $7,500
* Pfizer ........................................................ $5,500
* Microsoft ............................................... $3,000
* Citigroup ................................................ $2,000
* Union Pacific Railroad............................... $2,000
* Altria ......................................................... $1,000
* Walmart .................................................... $1,000
* CenturyLink ............................................. $500

Alan Wilson – South Carolina:
* Comcast .................................................. $10,500
* Anheuser-Busch InBev SA/NV ...................... $8,000
* Altria ......................................................... $7,000
* Las Vegas Sands Corp. ............................. $7,000
* Pfizer ......................................................... $7,000
* Aflac ......................................................... $4,500
* British American Tobacco ........................ $4,500
* AT&T ......................................................... $3,500
* Duke Energy ............................................ $3,500
* NortonLifeLock ........................................ $3,500
* Cigna ....................................................... $2,000
* The Home Depot ....................................... $2,000
* Coca-Cola ............................................... $1,500
* HomeServe ............................................. $1,500
* Allstate .................................................... $1,000
* Walmart .................................................... $1,000
* Unum Group ........................................... $750
* Norfolk Southern ..................................... $500
* Pitney Bowes ........................................... $500

Jason Ravnsborg – South Dakota:
* Las Vegas Sands Corp. ............................. $4,000
* Bayer AG ................................................ $1,500
Companies with emissions reduction goals/policies that donated directly to Republican attorneys general candidates in the 2019 elections

**Jeff Landry – Louisiana:**
* Anthem ..................................................... $5,000  
* Amazon .................................................... $5,000  
* AT&T ......................................................... $5,000  
* British American Tobacco ........................ $5,000  
* CenturyLink .............................................. $5,000  
* Chevron .................................................... $5,000  
* Cigna ........................................................ $5,000  
* Comcast ................................................... $5,000  
* Las Vegas Sands Corp. ........................... $5,000  
* Marathon Petroleum ................................ $5,000  
* Pfizer ......................................................... $5,000  
* QEP Resources ........................................ $5,000  
* Range Resources ....................................... $5,000  
* Union Pacific Railroad.............................. $4,500  
* Bayer AG .................................................. $4,500  
* American Electric Power .......................... $4,000  
* Mallinckrodt ............................................ $4,000  
* Phillips 66 .............................................. $3,501.32  
* Citigroup ................................................... $3,500  
* Alphabet .................................................. $2,500  
* ConocoPhillips .......................................... $2,500  
* Enbridge .................................................. $2,500  
* Fluor ......................................................... $2,500  

**Lynn Fitch – Mississippi:**
* Huntington Ingalls Industries ................... $2,000  
* Bayer AG .................................................. $1,000  
* Comcast .................................................. $1,000  
* Denbury ................................................... $1,000  
* Tyson Foods ............................................. $1,000  
* Norfolk Southern ...................................... $250  

* Altria ........................................................ $1,000  
* Capital One Financial Corp. .................... $1,000  
* Cheniere Energy ....................................... $1,000  
* Chubb Limited ......................................... $1,000
Companies with emissions reduction goals/policies that donated directly to Republican attorneys general candidates in the 2020 elections

**Todd Rokita – Indiana:**
* Aflac ......................................................... $1,000

**Austin Knudsen – Montana:**
* Denbury .................................................... $360

**Sean Reyes – Utah:**
* Altria .................................................................. $20,000
* Comcast ............................................................... $16,500
* Walmart ................................................................ $12,500
* Usana Health Sciences ........................................ $11,000
* Amazon ................................................................ $10,000
* Smiths Group ADR ............................................. $10,000
* Mallinckrodt ........................................................ $8,500
* Pfizer .................................................................. $8,500
* Fox Corporation ..................................................... $7,000
* Walgreens Boots Alliance .................................... $7,000
* The Home Depot ................................................... $5,000
* Las Vegas Sands Corp. ......................................... $5,000
* Aflac .................................................................. $5,000
* Lumen Technologies ............................................. $3,500
* News Corp. ........................................................... $2,500

* Eli Lilly & Co. ....................................................... $2,000
* NortonLifeLock .................................................. $2,000
* Citigroup ............................................................ $1,500
* Chevron ............................................................. $1,000
* Union Pacific Railroad ........................................ $1,000
* WH Group ........................................................ $500